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

The Conservation Fund

Working Forest Fund and Related Properties

United States

SCS-FM/COC-00102N

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21 December 2017

EXPIRATION 20 December 2022

DATE OF FIELD AUDIT 4 – 5 October 2017

DATE OF LAST UPDATE

20 December 2017

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Foreword

SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as "well managed," thereby permitting the FME's use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<u>http://info.fsc.org/</u>) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Certificate Registration Information

1.1.1.a Name and Contact Information

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

1.1.1.b FSC Sales Information

X FSC Sales contact information same as above.				
FSC salesperson				
Address		Telephone		
		Fax		
		e-mail		
		Website		

1.1.2 Scope of Certificate

Certificate Type	Single FMU	X Multiple FMU	
	Group		
SLIMF (if applicable)	Small SLIMF	Low intensity SLIMF	
	certificate	certificate	
	Group SLIMF cert	ificate	
# Group Members (if applicable)			
Number of FMUs in scope of certificate			
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude:		
Forest zone	Boreal	X Temperate	
	Subtropical	Tropical	
Total forest area in scope of certificate which is:		Units: 🗌 ha or 🗴 ac	
privately managed	132,863		
state managed			
community managed			

Number of FMUs in scope	e that are:			
less than 100 ha in area		100 -	1000 ha in area	1
1000 - 10 000 ha in area	8 more than 10 000 ha in area			1
Total forest area in scope	of certificate which is in	cluded	in FMUs that:	Units: 🗌 ha or 🗶 ac
are less than 100 ha in are	ea			
are between 100 ha and 1	1000 ha in area		2,041	
meet the eligibility criteria	a as <i>low intensity</i> SLIMF F	MUs		
Division of FMUs into ma	<u> </u>			
Divided among the follow	ing 10 properties.			
<u>California</u> Garcia River Forest – 24,0 Gualala Forest – 14,000 ad Big River and Salmon Cree Buckeye Forest – 18,120 a <u>Vermont</u> McConnell Pond – 4,665 a <u>Maine</u> East Grand Lake – 4,544 a Reed Plantation – 32,431 <u>Pennsylvania</u> Penfield Forest – 2,041 ac <u>New Hampshire</u> Success Pond – 8,900 acree	cres ek – 16,000 acres acre acres cres acres			
<u>New York</u> Cranberry Lake – 8,162 ac	res			

1.2 FSC Data Request

1.2.1 Production Forests

Timber Forest Products	Units: ha or X ac
Total area of production forest (i.e. forest from which timber may be	<mark>116,087</mark>
harvested)	
Area of production forest classified as 'plantation'	<mark>0</mark>
Area of production forest regenerated primarily by replanting or by a	<mark>0</mark>
combination of replanting and coppicing of the planted stems	_
Area of production forest regenerated primarily by natural regeneration,	<mark>116,087</mark>
or by a combination of natural regeneration and coppicing of the naturally	
regenerated stems	
Silvicultural system(s)	Area under type of

	management	
Even-aged management	0	
Clearcut (clearcut size range)		
Shelterwood		
Other:		
Uneven-aged management	116,087	
Individual tree selection		
Group selection		
Other:		
Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-		
pastoral system, agro-forestry system, etc.)		
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH		
where available) of commercial timber (m3 of round wood)		
Garcia River Forest, CA	1.5 MBF	
Gualala Forest, CA	1.5 MBF	
Salmon Creek Forest, CA	1 MBF	
Big River Forest, CA	4 MBF	
Buckeye, CA	5 MBF	
Penfield Forest, PA	1,480 tons	
Success Pond, NH	7,073 tons	
McConnell Pond, VT	3,600 tons	
East Grand Lake, ME	4,528 tons	
Cranberry Lake, NY	2,339 cords	
Reed Plantation, ME	5,500 cords	
Non-timber Forest Products (NTFPs)	· ·	
Area of forest protected from commercial harvesting of timber and	0	
managed primarily for the production of NTFPs or services		
Other areas managed for NTFPs or services	0	
Approximate annual commercial production of non-timber forest		
products included in the scope of the certificate, by product type		
Explanation of the assumptions and reference to the data source upon wl	nich AAH and NTFP harvest	
rates estimates are based:		
Management plans include discussion or documentation with model outpu	ts or other rationale	
explaining assumptions for Annual Allowable Harvest rates.		
Species in scope of joint FM/COC certificate: (Scientific / Latin Name and C	common / Trade Name)	
Abies balsamea, Abies concolor, Acer rubrum, Acer saccharum, Alnus rubra,	.	
Betula nigra, Betula papyrifera, Carya spp., Fagus grandifolia, Fraxinus americana, Fraxinus nigra, Larix		
laricina, Liquidambar styraciflua, Liriodendron tulipifera, Notholithocarpus densiflorus, Picea glauca,		
Pinus lambertiana, Picea mariana, Picea rubens, Pinus strobus, Pinus taeda,		
Populus grandidentata, Populus tremuloides, Prunus serotina, Pseudotsuga		
Quercus rubra, Quercus spp., Sequoia sempervirens, Thuja occidentalis, Tilic	a americana, Tsuga	
canadensis		

1.2.2 FSC Product Classification

Timber products

	Product Level 1	Product Level 2	Species	
\Box	W1 Rough Wood	W1.1 Roundwood (logs)	All	
		W1.2 Fuel Wood		
		W1.3 Twigs		
	W2 Wood charcoal			
	W3 Wood in chips or particles	W3.1 Wood chips	Abies balsamea, Acer rubrum, Acer saccharum, Betula alleghaniensis, Betula nigra, Betula papyrifera, Carya spp., Fagus grandifolia, Fraxinus americana, Fraxinus nigra, Larix laricina, Picea glauca, Picea mariana, Picea rubens, Pinus strobus, Populus balsamifera, Populus grandidentata, Populus tremuloides, Prunus serotina, Quercus alba, Quercus rubra, Quercus spp., Thuja occidentalis, Tilia americana, Tsuga canadensis	
	Other*	Please List:		
Note: If your operation produces processed wood products such as wood pellets, planks, beams, poles etc. please discuss with SCS staff as you may need a separate CoC certificate.				

Non-	Non-Timber Forest Products			
	Product Level 1	Product Level 2	Product Level 3 and Species	
	N1 Bark			
	N4 Straw, wicker, rattan and similar	N4.1 Rattan cane (rough form)		
		N4.2 Rattan taper (clean, peeled and spitted)		
		N4.3 Decorative objects and wickerwork		
		N4.4 Rattan furniture		
		N4.5 Rattan furniture		
		components		
	N6 Plants and parts of plants	N6.1 Flowers		
		N6.2 Grasses, ferns,		
		mosses and lichens		
		N6.3 Whole trees or	N6.3.1 Christmas trees	
		plants		
		N6.4 Pine cones		
	N7 Natural gums, resins, oils and derivatives	N7.1 Rubber/latex		
		N7.2 Gum resin		

	N7.3 Resin and	
	manufactured resin	
	products	
	N7.4 Tannin	
	N7.5 Essential oils	
N9 Food	N9.1 Nuts	
	N9.2 Tea	
	N9.3 Palm-hearts	
	N9.4 Mushrooms, truffles	
	N9.5 Fruits	
	N9.6 sap-based foods	
	N9.7 Game	
	N9.8 Honey	

1.2.3 Conservation Areas

	Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives				
	High Conservation Value Forest/ Areas				
High	High Conservation Values present and respective areas: Units: 🗌 ha or				
	Code	НСУ Туре	Description & Location	Area	
X	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	North Coast, CA; Northern Spotted Owl habitat	2,737	
	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.			
X	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	North Coast, CA; Oak woodlands and grasslands.	1,195	
X	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Class I Streams North Coast, CA Forested wetlands, NH Forested wetlands, ME	3,172	
	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).			

	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	
Total Area of forest classified as 'High Conservation Value Forest/ Area'			<mark>7,104</mark>

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

N/A – All forestland owned or managed by the applicant is included in the scope.			
X Applicant owns and/or manages other FMUs not under evaluation.			
Applicant wishes to excise port	ions of the FMU(s) under evaluation	n from the scope of certification.	
Explanation for exclusion of	The Conservation Fund is a nation	nal organization, with land holdings	
FMUs and/or excision:	throughout the United States. So	me of the organization's properties	
	are FSC-certified, some SFI-certified	ed, and some are dual FSC- and	
	SFI-certified. The certified lands a	re the properties that support	
	timber harvesting. TCF's other for	rested properties are either not	
	managed for timber or are set to	be sold in the near future.	
Control measures to prevent	All properties where harvesting o	All properties where harvesting occurs use an invoicing system that	
mixing of certified and non-	must state the property of origin.		
certified product (C8.3):			
Description of FMUs excluded from	m or forested area excised from the	e scope of certification:	
Name of FMU or Stand	Location (city, state, country)	Size (ha or 🗴 ac)	
4 State Forest	VT, NH	24,675	
Twin Lakes	Iron County, WI	13,732	
Brunswick	Brunswick, NC	3,670	
Sansavilla	Wayne & Glynn, GA	12,002	
Logan	Logan, Mingo, Lincoln, WV	21,012	
CFI	Bulloch, Bryan, Jeff Davis,	14,225	
	Appling, GA		
Chesapeake Forest	Eastern Shore, VA	8,600	

1.4 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate
(differentiated by gender):116 male workers14 female workers

1.5 Pesticide and Other Chemical Use

FME does not use pesticides.

Commercial name of pesticide / herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated annually (ha or ac)	Reason for use
Roundup PRO	Glyphosate	2 quarts	50 acres	Reduce vegetative competition to enhance golden winged warbler habitat
Oust XP	Solfometuron Methyl	2 oz	50 acres	Reduce vegetative competition to enhance golden winged warbler habitat
lmazapyr	Glyphosate	3 gallons	69 acres	Foliar roadside spray to inhibit invasive plants

1.6 Standards Used

1.6.1 Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC FSC-US Forest Management Standard	1.0	July 2010
SCS COC indicators for FMEs	6.0	December 2016
FSC Trademark Standard (FSC-STD-50-001 V1-2)	1.2	November 2010
All standards employed are available on the websites of FSC International (<u>www.fsc.org</u>), the FSC-US (<u>www.fscus.org</u>) or the SCS Standards page (<u>www.scsglobalservices.com/certification-standards-and-program-documents</u>). Standards are also available, upon request, from SCS Global Services (<u>www.SCSglobalServices.com</u>).		

1.6.2 SCS Interim FSC Standards

Title	Version	Date of Finalization
This SCS Interim Standard was developed by modifying SC management in the region and by incorporating relevant and comments from stakeholders. More than one month Interim Standard for the country / region was sent out fo International, SCS, the forest managers under evaluation, available at <u>www.scsglobalservices.com/certification-star</u> SCS Global Services (<u>www.SCSglobalServices.com</u>).	components of the l prior to the start of r comment to stakel , and the National In	Draft Regional / National Standard the field evaluation, the SCS Draft nolders identified by FSC itiative. A copy of the standard is

1.7 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	То	multiply by
Mile (US Statute)	Kilometer (km)	1.609347

Foot (ft)	Meter (m)	0.3048
Yard (yd)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	То	multiply by
Square foot (sq ft)	Square meter (m ²)	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	То	multiply by
Cubic foot (cu ft)	Cubic meter (m ³)	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

2. Description of Forest Management

2.1 Management Context

2.1.1 Regulatory Context

Doutinent Degulations at the National Louis	Endangered Species Act
Pertinent Regulations at the National Level	Endangered Species Act
	Clean Water Act (Section 404 wetland protection)
	Occupational Safety and Health Act
	National Historic Preservation Act
	Archaeological and Historic Preservation Act
	Americans with Disabilities Act
	U.S. ratified treaties, including CITES
	Lacey Act
	Forest Resources Conservation and Shortage Relief Act
	National Resource Protection Act
	National Environmental Protection Act
	National Wild and Scenic River Act
	Native American Grave Protection & Repatriation Act
	Rehabilitation Act
	Architectural Barriers Act
Pertinent Regulations at the State / Local	California
Level	Z'Berg-Nejedly State Forest Practices Act of 1973
	California Endangered Species Act
	California Environmental Quality Act
	California Civil Code Section 1008
	Native Plant Protection Act
	Porter-Cologne Water Quality Control Act
	The California Forest Practice Regulations (FPR)
	Williamson Act
	Timberland Productivity Act
	Mendocino Co standing dead tree ordinance (June '16)
	Vermont
	See Department of Forests, Parks and Recreation
	publication, Timber Harvesting in Vermont:
	Summary of Laws and Regulations, available
	on the department's website.
	on the department's website.
	Maine
	Maine Revised Statute Annotated (M.R.S.A.), Title 12
	Maine Forest Practices Act
	Maine Forest Service Rules, Chapters 20, 21
	Maine Endangered Species Act
	Maine Natural Resources Protection Act
	Shoreland Zoning Act
	Erosion and Sedimentation Control Act

	Protection and Improvement of Water Act
	Fish and Wildlife Management Laws Great Ponds Act
	The Land Use Regulation Act
	DEP, Resource Conservation and Recovery Act
	Maine Human Rights Act
	Pennsylvania
	Private lands forestry is managed by the Division of
	Forests and Lands. See its website and that of
	University of New Hampshire Cooperative
	Extension for pertinent state laws.
	New Hampshire
	Private lands forestry is managed by the Department
	of Conservation and Natural Resources. See its
	website for pertinent state laws.
	New York
	6 NYCRR Part 190
	Article XIV, §3 of the New York State Constitution
	Articles 8 and 9 of the Environmental Conservation
	Law
	Article 8 - (8-0101 - 8-0117) ENVIRONMENTAL QUALITY
	REVIEW
	Article 9 - LANDS AND FORESTS
	Title 1 - (9-0101 - 9-0113) GENERAL PROVISIONS
	Title 3 - (9-0301 - 9-0307) USE OF LANDS AND
	FORESTS
	Title 5 - (9-0501 - 9-0509) REFORESTATION
	AREAS
	Title 7 - (9-0701 - 9-0717) COOPERATIVE FOREST
	MANAGEMENT PROGRAM
	Title 8 - (9-0801 - 9-0815) FOREST RESOURCES
	PLANNING
	Title 9 - (9-0901 - 9-0903) RECREATION
	Title 11 - (9-1101 - 9-1123) FOREST FIRE
	CONTROL
	Title 13 - (9-1301 - 9-1303) FOREST INSECT AND
	DISEASE CONTROL
	Title 15 - (9-1501 - 9-1503) REMOVAL OF TREES
	AND PROTECTED PLANTS
Regulatory Context Description	North Coast Timberlands
	California has some of the most rigorous forest

	practice regulations in the United States. These
	regulations are developed by a governor-appointed
	Board of Forestry and based on the Z'Berg-Nejedly
	Forest Practices Act of 1973. Additionally, the Federal
	Endangered Species Act, the California State
	Endangered Species Act, and EPA Clean Water Act also
	play a significant role in regulating forestry activities in
	California.
ľ	

A Timber Harvest Plan (THP) must be prepared for every timber harvest project. The THP is considered the functional equivalent of an environmental impact report (EIR) under the California Environmental Quality Act (CEQA). The lead agencies for overseeing THP process are the California Department of Forestry and Fire Protection (CalFIRE) and California Regional Water Quality Control Board (CRWQCB). The California Department of Fish and Game (CDFG), and the California Department of Mines and Geology (CDM&G) also provide significant input into the THP process. As a group, the agencies review the written THP and evaluate the company's compliance with the FPA by making onsite visits before, during, and after harvest. Moreover, the THP process is a public process. The project proponent files their long-term plan and THP with the state and the public is given opportunity to provide written or verbal comment to the agencies. The agencies are required to respond to each comment in writing. Additionally, the National Marine Fisheries Service monitors each project's protection of RTE anadromous fish (chinook and coho salmon and steelhead trout). The California Department of Fish and Game monitors other RTE species on behalf of the National Fish and Wildlife Service. The state also regulates the protection of historical and archaeological sites. Native American Tribes are given significant opportunities to protect sites of cultural importance. Archaeological, cultural, and historical resources have added protections that the FME must address.

New Hampshire

New Hampshire has state laws and regulations that encourage active forest management while reducing the environmental impact. Central to this regulatory environment is the notion of *current use*, which is a longstanding open space property taxation program

that encourages landowners to keep their land as
undeveloped. "Rather than a property being taxed at
its real estate market value, the land is taxed on
its income producing capability. For example, through
current use, land may be taxed as a woodlot
or a farm, not as a potential site for houses." ¹
Since 1989, the state legislature has formally
recognized in statute the importance of working
forests to the economy, ecology, and quality of life in
the state. This social license to practice forestry
contributes to a healthy forest-based manufacturing
industry that contributes \$1.15 billion supporting
8,160 jobs; forest-based recreation and tourism is
worth \$1.12 billion supporting 11,401 jobs. ²
In addition to legislative backing for maintaining
working forests on the landscape and a social license
for forest management, the state has a number of
additional laws and regulations that directly influence
forestry. Highlights include laws pertaining to timber
tax, forest management, wetlands management,
timber harvesting, harvest taxes, and a variety of other
-
legal requirements. See <i>Guide to New Hampshire</i>
<i>Timber Harvesting Laws</i> for a comprehensive list.

2.1.2 Environmental Context

Environmental safeguards:

North Coast Timberlands

Site level conditions are assessed as part of THP process, including forest community types, RTE species, soil resources, botanical resources, and other requirements of the standard. At a larger landscape level, the Integrated Resource Management Plans assesses these factors on the level of the individual tracts.

Review of THPs and their implementation on the ground showed numerous examples of management approaches designed to reduce negative impacts, including using low impact logging techniques, altering harvest plans to accommodate threatened species, use of streamside management zones and the focus on uneven aged management.

The California Forest Practice Rules have strict requirements for road construction and maintenance, stream crossings, equipment, and other BMPs.

¹ *Guide to New Hampshire Timber Harvesting Laws,* University of New Hampshire Cooperative Extension. Revised April 2014. Available at <u>https://extension.unh.edu/resources/files/Resource000253_Rep274.pdf</u>.

² *New Hampshire Forest Action Plan*, National Association of State Foresters. Accessed 12 December 2017. Available at <u>http://stateforesters.org/forest-action-plans/new-hampshire</u>.

New Hampshire

See Regulatory Context in 2.1.1 above. New Hampshire's various state laws and regulations, combined with TCF's light-touch conservation forestry approach, provide strict environmental safeguards for the management of the Success Pond FME.

Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:

North Coast Timberlands

State natural heritage database is reviewed as part of the planning process, and listed species are assumed to be present. Species requiring the most attention is the northern spotted owl. Trained members of the staff conduct owl surveys prior to harvest, and identify owl activity centers ("circles") in harvest plans. Salmonid streams receive additional protection measures mandated by the California Forest Practice Rules.

New Hampshire

"The New Hampshire Natural Heritage Bureau has identified the following species as threatened or endangered on the Success Pond property: American Martin, Common Loon, Osprey, Pink Winter green, and Sweet Coltsfoot. If state or federal listings and species databases indicate the likely presence of a rare, threatened, and endangered species or plant community type, either a survey will be conducted prior to management activities being carried out (to verify the species' presence or absence) or WFF will manage as though the species is present. If an applicable species and plant community type is determined to be present, its location will be reported to the manager of the applicable database. When a rare, threatened, or endangered species or plant community type is present or assumed to be present; the necessary modifications will be made to the harvest prescription and included as an addendum to the harvest plan. Conservation zones will be created and/or maintained for existing rare, threatened, or endangered species and plant community types to enhance the viability of populations and their habitats, including their connectivity within the landscape. When rare, threatened, or endangered species or plant community types are present or assumed to be present, control of hunting, fishing, trapping and collecting is adequate to protect species and/or plant communities" (from FMP, ³ p. 37).

2.1.3 Socioeconomic Context

North Coast Timberlands

North Coast Region Land Ownership

"Roughly 80 percent of timber land is privately owned – divided about equally between industrial timber ownerships and non-industrial ownerships – totaling 2.8 million acres. Nearly three-fourths of this private timber land is within designated Timber Production Zones.

³ The Conservation Fund, 2017. *Multiple Resource Management Plan: Success Pond Tract.* Success, New Hampshire.

The public forest land in the region is largely in National Park and U.S. Forest Service ownership, primarily in Humboldt and Mendocino counties. The California Department of Forestry and Fire Protection also manages the 46,000-acre Jackson State Demonstration Forest in Mendocino County, the largest state forest in California."⁴

One of the current threats to the ecological viability of the region, and a major cause of concern, is the increasing trend of land subdivision and fragmentation. Landholders have found that selling off portions of their holdings for conversion to rural residential subdivisions or 'hobby' vineyards yields a greater financial return than keeping their forests in timber production. This phenomenon was one of the drivers behind TCF's North Coast Forest Conservation Initiative to establish large, contiguous, working forests as a conservation tool.

Regional Economy

The timber industry, at one time the most robust in the region, has undergone a major downsizing in recent decades due primarily to the "liquidation of timber inventories, associated with decades of industrial timber management of private lands, and the increased cost of permitting and environmental regulation of the industry (TCF 2005)."

"The decline in timber production, the increase in operating costs, and the increased efficiency of production methods has also caused many mill closures in the region. In 2000, there were 26 mills operating in the North Coast counties of Del Norte, Humboldt, Mendocino, and Sonoma. Between 2000 and 2003, eight timber mills were closed in the region, leaving 18 currently in operation. As recent closures at Pacific Lumber have shown, these mills remain precariously balanced, and other closures are possible.

Despite these significant declines in harvest volumes, and the attendant ripples through the regional economy, the North Coast still accounts for a third of California's timber production. Half of California's annual timber revenue comes from Mendocino and Humboldt counties, where the value of redwood harvest in 2000 was \$390 million, 43% of the total value for the state. The forest products industry is "extremely important" to many local economies in the Northern California "timber counties," generating about 13% of the personal income and 16% of the jobs."⁵

Located near the FMUs are the towns of Fort Bragg (2000 census population 7,026) and Mendocino (2000 census population 824). The small coastal communities of Mendocino County, particularly Mendocino itself, are popular destinations for vacationers from the San Francisco Bay Area. Accordingly, the county has seen an increase in jobs related to leisure and hospitality. Government is the largest employer in the region, providing 23% of all jobs.

⁴ The Conservation Fund, 2005. *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.* Page 106. ⁵ The Conservation Fund, 2005. *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.* Pages 120-121.

Native American Presence

"The northern counties of the North Coast region – Del Norte, Humboldt, and Mendocino – have relatively large populations of Native Americans. Compared to the state average, where Native Americans make up just one percent of the state population, Native Americans represent roughly five to six percent of the population in those three counties, and represent a number of tribal affiliations, including: Tolowa, Karuk, Yurok, Hupa, Whilkut, Wiyot, Nongati, Bear River, Mattole, Sinkyone, Lassik, Wailaki, Yuki, Cahto, Coast Yuki, and Pomo. There are at least 23 rancherias and reservation in the North Coast, which encompass over 170,000 acres."⁶

The Garcia River Integrated Resource Management Plan (GRF IRMP) describes in more detail the history of Native American presence on the Property: "The Garcia watershed lies within the Pomo ethnographic province and was inhabited by a native people known as Bokeya, or Central Pomo. The ancestral lands of this tribe extended along the coast from just north of the Navarro River southward about 35 miles to near the mouth of the Gualala River. A permanent village was located on the Garcia River not far from the present Rancheria; known as 'pdahaw' (translated as 'at the stream mouth'), the population was estimated at around 200. These factors and various previously recorded sites indicate that the prehistoric resources most likely to be encountered on the Property are lithic scatters with groundstone present, reflecting generalized use of the area. Native American sites are commonly situated along trending ridgelines or spurs, broad mid-slope terraces, and areas adjacent to seasonal and perennial watercourses, including springs."⁷

New Hampshire

The following excerpts are from the forest management plan for Success Pond.⁸

Surrounding Landscape

"The Success Pond tract is one contiguous parcel of land situated in an area of mountains, wetlands, lakes, streams. The surrounding landscape is comprised large blocks of former paper company lands that have had a wide range forest management activities implemented. The property is relatively close to the Appalachian Trail, White Mountain National Forest, and other conserved properties" (FPM, p. 2).

"[It] is located in the northeastern region of New Hampshire. The property is bordered on the north by the Cambridge town line and lands owned by Bayroot, on the south by lands owned by Thomas Dillon, a large Maine logging contractor, on the east by the Maine State line and lands owned by Bayroot and Maine Bureau of Public Lands, and on the west by the Milan town line and lands owned by The Conservation Fund, Bayroot, and smaller private landowners and investors. The tract is one contiguous

⁶ The Conservation Fund, 2005. *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.* Page 112. ⁷ The Conservation Fund, 2006. *Garcia River Forest Integrated Resource Management Plan.* Larkspur, California. Page 38.

block of timberland, with a single large inholding comprised of Success Pond itself and the recreational camps that surround it. These recreational camps were former leases that were divested, in mass, by Hancock Timber Resource Group" (FMP, p. 6).

Access to Markets

"The primary subject's economic area is comprised of towns to the north and south in Coos County. The property is generally located in the northeastern portion of New Hampshire and more specifically along the western boundary of Grafton TWP Oxford County, Maine" (FMP, p. 5).

"The Success Pond sits in a largely rural area with several forest products companies nearby. Significant land ownership patterns have included agriculture and timber production. The timberlands that surround the property are all former industrial parcels. As the industrial owners divested their land holdings these parcels were sold into private ownership. The pool of owners that own the timberlands surrounding Success is made up of TIMOs, logging contractors, and individual investors." (FMP, p. 6).

"The parcel is well located to reach most timber markets found in the northeast US and southern Quebec. State and Town roads are strategically located to provide good public access routes to all areas of the property. New Hampshire State Routes 2, 16, and 26 forms the backbone of the transportation system" (FMP, p. 5).

Native American Presence

"Currently, there are no federally recognized tribes in New Hampshire. After checking with the Bureau of Indian Affairs directory of Tribal Leaders and BIA Representatives it was determined that there were five potential communities of indigenous people that could be within 120 miles of the Success Pond property. The Abenaki tribe together with the Maliseet, Passamquoddy, Mi'kmag, and Penobscot were members of the Wabanaki Confederacy" (page 8). Non-recognized tribes and communities in New Hampshire include the Abenaki Nation (northern part of the state) and Pennacook (southern part of the state).

Most Native Americans were forced to leave New Hampshire during the 1600's, when eastern tribes were being displaced by colonial expansion. These tribes are not extinct, but except for the descendants of New Hampshire Native Americans who hid or assimilated in to white society, they do not live in New Hampshire anymore. Most tribes that were once native in New Hampshire ended up on reservations in Canada" (FMP, p. 8).

"The forest management activities implemented on the property will follow the silvicultural guidelines currently accepted in the industry. Should evidence of indigenous people be identified and verified on the property, management activities will be modified so not to threaten or diminish, either directly or indirectly, the resources, tenure rights, sites of special cultural, ecological, economic, or religious significant" (FMP, p. 10).

2.1.4 Land use, Ownership, and Land Tenure

North Coast Timberlands

TCF manages the FMU for timber production and ecosystem services to finance the long-term protection and restoration of coastal forest ecosystems. The FMU consists of four properties (Garcia River Forest, Gualala Forest, Salmon Creek Forest, Big River Forest) that were formerly managed under the management of industrial timber companies. All properties are held in fee simple by TCF. Ownership records, easements, and other land use agreements are maintained in TCF offices and available to the competent authorities. The Nature Conservancy (TNC) holds a conservation easement on Garcia River Forest and the Gualala River Forest. Permanent conservation restrictions on the Big River and Salmon Creek tracts are in the form of a recorded Offer to Dedicate held by the State Coastal Conservancy and the Wildlife Conservation Board.

New Hampshire

"The Town of Success is made up of two parcels. For approximately 100 years the Brown Company owned both parcels. The Brown Company was the sole owner of south Success. In the north Success (which is currently owned by TCF) the ownership was different. The Brown Company was the majority owner with the remaining ownership divided among private individuals and smaller companies.

In the 1980's the Brown Company went out of business. James River Corporation purchased the Brown Company pulp mills in Berlin and Gorham, New Hampshire as well as the timberland in Success. In 1995 James River sold the Success timberlands to the Hancock Timber Resource Group (HTRG). HTRG in turn hired Wagner Forest Management to manage the Success timberlands.

Heartwood Forestland Fund IV (HFFIV), managed by the TIMO The Forestland Group, LLC acquired the Success Pond property in 2004. HFFIV actively managed the property for seven years.

The property was purchased by The Conservation Fund's Working Forest Fund[®] in fall of 2012. TCF's WFF currently has a five to ten-year ownership horizon for the Success Pond property and plans to convey a conservation easement for the property to the State of New Hampshire. Once the easement has been conveyed, timing for the disposition of the property will be evaluated" (FMP, p. 5).

2.2 Forest Management Plan

North Coast Timberlands

Management Objectives:

There are site-specific objectives for each property that makes up the FMU. However, the objectives stated in the plan for the Garcia River Forest capture the intent of TCF for all of the FMU:

The Garcia River Forest project was initiated in February 2004 by The Conservation Fund in partnership with The Nature Conservancy (TNC), the State Coastal Conservancy and the Wildlife Conservation Board. The overarching goals for this project are perhaps best stated in the conservation easement granted to TNC:

- Restore and protect a productive and relatively natural coastal California forest ecosystem.
- Protect fish and wildlife habitat associated with this ecosystem, in particular the oak woodlands, serpentine grasslands, and redwood/-Douglas-fir, forest, and spawning habitat for coho salmon and steelhead trout.
- Protect significant water resources, springs and the water quality thereof.
- Maintain the capacity of the Property for productive forest management, including the long-term sustainable harvest of high quality forest products, contributing to the economic vitality of the state and region in a manner that does not impair the Conservation Values or the other purposes of this Easement Purposes.
- Maintain the use of the Property for outdoor recreation.
- Maintain at least 35 percent of the Property as a permanent ecological reserve network (the "Ecological Reserve Network"), which shall include oak woodlands, grasslands, riparian areas and other areas with high value conservation features.
- Prohibit any use of the Property that will impair, degrade or damage the Conservation Values of the Property.

The project seeks to test the hypothesis that a large tract of coastal forest can be returned to sustainable timber production and ecological vitality through patient management by a non-profit organization in partnership with private and public agencies and community stakeholders. Whether this hypothesis can be proved on the Garcia River Forest (the Forest) is not a foregone conclusion – there are many challenges to be overcome, including low current timber volumes, a predominance of hardwoods in many stands, the burden of maintaining and improving an extensive road system, as well as the uncertain economic, regulatory and political environment affecting the timber industry as a whole.

Forest Composition and Rationale for Species Selection:

The TCF FMUs primarily comprise second- and third-growth coastal redwood/Douglas-fir dominated stands. The forests were extensively cutover in the 1950s and 1960s by the previous landowners, and as a result now contain an unnaturally high density of hardwoods, particularly tanoak (*Lithocarpus densiflora*), compared to pre-settlement conditions. Other commercial species occurring on the properties are grand fir (*Abies grandis*), sugar pine (*Pinus lambertiana*), and Western hemlock (*Tsuga heterophylla*).

General Description of Land Management System(s):

In general, TCF plans to employ high-retention, single-tree selection silviculture with a 10-20 year reentry period. Due to past harvesting practices, the majority of the stands are younger and relatively simplified in terms of habitat structure. In well-stocked stands the first harvest entries will be individual tree selection and thinning from below to release the growth potential of high-quality the residual trees. These harvests will produce many stems but there will be relatively low volume due to the smaller average piece size; TCF feels this is a necessary step to achieving the long-term goal of increasing growth and recruiting vigorous future crop trees. Because of low conifer occupancy or quality, many stands will require a one-time "rehabilitation" treatment to increase future occupancy and productivity. In these situations, TCF will also reduce tanoak competition in stands that were historically conifer-dominant by using variable retention harvests, and by mechanical or chemical treatment.

Harvest Methods and Equipment used:	Felling is done primarily with chainsaws, although
	feller bunchers may be used on where slope
	permits. Skidders and yarders are the primary
	pieces of equipment used for hauling felled timber
	to landing areas.

Explanation of the management structures:

Overall project leadership falls with Evan Smith, VP Conservation Ventures (based in Portland, OR) and Scott Kelly, Timberlands Operations Manager. The Conservation Fund has opened a local office in Caspar, California, which is managed by the North Coast Program Coordinator, Holly Newberger. Additionally, area RPFs have been hired to write THPs, oversee subcontractors, and assist with other program activities. A suite of contractors has been retained for the diverse requirements of the program, including GIS, accounting, ecology/biology, roads, logging, watershed, inventory and modeling, and security, among others. TCF also works in close collaboration with TNC due to the Garcia River and Gualala River conservation easements.

New Hampshire

Management Objectives:

Forest management goal for the period of 2017-2027 is to manage the property as a yield oriented investment with an investment period of 10 years for the current fund. To reach this goal, the FME has established the following 10 objectives:

- 1. Generate a sufficient dividend from the stumpage flow to meet annual fiscal objectives.
- 2. Utilize management practices that will increase the sawtimber component of the forest on the whole.
- 3. Capture current timber value from stands where decline or maturity put the value of the current overstory at risk, especially where suitable advanced regeneration is present.
- 4. Maintain the value of the internal road system.
- 5. Meet investment goals while maintaining compliance with State regulations.
- 6. Provide for continued use of the ownership by the general public for outdoor recreation activities.
- 7. Manage in accordance with the FSC and SFI Principles and Criteria.
- 8. Place a conservation easement on the ownership to conserve the property as a working forest.
- 9. Remain compliant with the terms of the conservation easement at all times once the conservation easement is place.
- 10. Manage the use of ATVs and snowmobiles on the ownership through active trail maintenance to prevent sediment movement.

Forest Composition and Rationale for Species Selection:

<u>Hardwoods</u>: "The hardwood forest type (particularly Northern Hardwoods SAF cover types 31and 60) is the dominant stand type on the property. Hardwood stand types represent 5,336 acres of the total tract commercial acreages. The Northern Hardwood type occurs in various stages of development..." (FMP, p. 14). Species present include yellow birch, sugar maple, and beech, with the presence of each species strongly influenced by the site condition.

<u>Mixed Wood</u>: "There are two types of mixed wood forest types that occur on Success. Mixed wood represents 1,844 acres of the total tract commercial acreages. Most mixed wood stands are dominated by softwood...Past harvest activities under the HTRG ownership appear to have targeted spruce and the better quality Hardwood. Present stands are somewhat heavily stocked with balsam fir with scattered individuals and small groups of Spruce. The hardwood in these stands is comprised of scattered large over mature yellow birch as well as poorly formed younger individuals, red maple of fair quality, and suppressed white birch that was released during past harvests. The white birch is either standing dead or almost dead. The understory in the softwood dominated mixed wood stands (HS1BC - HS2C) consists of yellow birch, striped maple, red maple, balsam fir,

and scattered spruce...The second mixed wood type is dominated by hardwood (SAF cover type 35) 908 acres, with HS3B and HS2A B the most prevalent. It appears these stands became established as a result of past clearcuts. In this type, depending on the stand, white birch, yellow birch, and red maple are dominant" (FMP, p. 14).

General Description of Land Management System(s):

A combination of even-aged and irregular even-aged silviculture are used on the FMU. Silvicultural objectives on the FMU vary depending on the forest type:

(1) <u>Northern Hardwood</u> - Even-aged management to produce high quality sawlogs and veneer with treatments to maintain the vigor of overstory trees while enhancing sawtimber volume and value, and reducing the proportion of beech over the long-term. Seed tree and shelterwood are the preferred methods of regeneration.

B) <u>Softwood</u> - Even-aged management to produce sawlogs and increase the vigor of the stands. A secondary goal is to maintain retention patches with a continual overstory to provide winter cover for moose and white-tailed deer. Small groups, patch clearcuts, and strip cuts are used to establish and release balsam fir regeneration. Over the long-term an attempt will be made to culture white pine and increase the number of stems in the stand on upland sites.

C) <u>Softwood</u> - Even-aged management to produce sawlogs and increase the vigor of the stands. A secondary goal is to maintain retention patches with a continual overstory to provide winter cover for moose and deer. Over the long-term, the proportion of tamarack and balsam fir will aim to be reduced and attempts will be made to culture white pine and increase the number of stems in the stand. Small groups, patch clearcuts, and strip cuts are the preferred methods to release and establish spruce/white pine regeneration.

D) <u>Softwood</u> - Even-aged management to produce sawlogs and increase the vigor of the stands. A secondary goal is to maintain retention patches with a continual overstory to provide winter cover for moose and white-tailed deer. Long-term, it is desirable to reduce the proportion of balsam fir, and attempts will be made to culture white pine and increase the number of stems in the stand. Small groups, patch clearcuts, and strip cuts are the preferred methods to release and establish red spruce regeneration.

E) <u>Mixedwood Hardwood Dominated</u> - Even-aged management to produce fiber and quality sawlogs. Silvicultural treatments are designed to maintain the vigor of overstory trees while favoring yellow birch, red maple, and red spruce. Over the long-term, the proportion of paper birch and balsam fir will be reduced. Seed tree and patch cuts is the preferred method to release and establish regeneration of yellow birch, red maple and red spruce.

F) <u>Mixedwood Softwood Dominant</u> - Even-aged management to produce fiber and quality sawlogs. Silvicultural treatments are designed to maintain the vigor of overstory trees while favoring red spruce, yellow birch, and red maple. Over the long-term, the proportion of paper birch and balsam fir will be reduced. Seed tree and patch cuts are the preferred methods to release and establish regeneration of favored species.

G) <u>Mixedwood Softwood Dominant</u> - Even-aged management to produce fiber and quality sawlogs. Silvicultural treatments are be designed to maintain the vigor of overstory trees while favoring red spruce and red maple. Over the long-term, the proportion of paper birch and balsam fir will be reduced. To encourage yellow birch, the better-quality individuals in the stand are maintained to provide a sufficient seed source. Seed tree and patch cuts are the preferred methods to release and establish regeneration of yellow birch.

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Harvest Methods and Equipment used:	There are three harvest methods typically used in
	northern New England: Chainsaw and Skidder;
	Mechanical Harvester; and Cut to Length. Each

method has its advantages and disadvantages and
has its place on the FMU.

Explanation of the management structures:

TCF uses LandVest, Inc., a timberland management and transaction firm, to oversee and implement management activities on the FMU. The project manager is David DeGruttola, LandVest district forester New Hampshire/Maine. The field forester is Patrick Smerczynski, LandVest staff forester. All fieldwork is approved by the project manager prior to the start of any work in the field. Field work is completed by both the project manager and the staff forester. The field forester makes weekly reports to the project manager for all active projects on the property. LandVest, Inc. and David DeGruttola have handled the on-the-ground management of the Success Pond property for seven years under The Forestland Group Heartwood Forestland Fund IV ownership and the last five years under The Conservation Fund.

2.3 Monitoring System

North Coast Timberlands

Growth and Yield of all forest products harvested.

TCF collects data on species, volumes, general stand composition, regeneration, brush species, snags and down material, timber quality.

Forest dynamics and changes in composition of flora and fauna

Monitoring of RTE species occurs prior to harvest when they have been identified on state databases, i.e. owl calling when NSO are present. Botanical surveys occur with THPs as part of planning process. HCVF areas receive specific monitoring in some cases, such as EMAP monitoring of salmonid watercourses.

Environmental Impacts

Post-harvest review of all THPs is conducted by the forester administering the sale. TCF has a road inventory of all forests (Gualala completed but not compiled), all road projects need 1600 permit and general discharge waiver. THPs have mandatory 3 year monitoring requirement.

Social Impacts

TCF maintains a log of its outreach and communication with the larger community. Social impacts are monitored informally through day-to-day contact with adjacent landowners and formally as reported in the North Coast Forest Conservation Initiative Annual Reports available on TCF's website.

Costs, Productivity, and Efficiency

All costs and revenues are tracked as part of normal business operations, as well as for annual reports that must be made available publicly by law.

New Hampshire

Growth and Yield of all forest products harvested.

"During timber harvesting, the yield of all forest products harvested is monitored during weekly site inspections. During the site visit time is spent on the landing and in the harvest area monitoring utilization of harvested trees" (FMP, p. 44). Weekly harvest inspection notes viewed for each of the sites visited, completed by the forester during active harvest through closeout, note utilization, as well as site conditions.

Forest dynamics and changes in composition of flora and fauna

Flora and fauna changes captured in pre- and post-harvest harvest cruises, and noted in the company GIS & stand level data.

Environmental Impacts

Environmental impacts captured during pre- and post-harvest harvest visits and cruises, and noted in the company GIS & stand level data.

Social Impacts

Social impacts are noted in company management plan.

Costs, Productivity, and Efficiency

Tracked during harvest and with completion of other management activities.

3. Certification Evaluation Process

3.1 Evaluation Schedule and Team

3.1.1 Evaluation Itinerary and Activities

	4 October 2017 North Coast Timberlands, California: Big River Forest FMU			
Site #	Name	Feature of interest	Audit team notes	
	Caspar Office	Opening Meeting	Discuss changes in past year. Review of evidence. Overview of North Coast Timberlands, including Big River Forest, the parcel to be visited that day. Select field sites and review itinerary for day.	
1	Two Log Haul Road	Road maintenance	Road from Highway 20 gate to Spur Road to Mendocino Redwood Company (MRC) bridge over Two Log Creek is in good condition with drainage structures functioning. Segment was graded earlier this year using "Green Grading" technique, which aims to minimize disturbance. Applied magnesium chloride for dust abatement, in part to reduce the need for taking stream water to retain water levels for salmon.	
2	Two Log Creek	Protections for Class 1 (fish-bearing) stream; in-stream habitat	Confirmed compliance with California Forest Practices Act (FPA) rules, which require on each side of Class 1 stream a 35-foot no cut buffer and maintenance of 80% canopy cover the next 70 feet. Observed some intentionally-placed large woody-debris (pairs of 25-foot long logs, each tagged and located with GPS) which are improving in-stream habitat (pool scouring had occurred) as part of a Fisheries Restoration Grant Program.	
3	Spur road and bridge over Two Log	Condition of inactive spur road and of bridge over Class 1 stream	Road and bridge were last used for the Jarvis Camp THP in 2007. Bridge consists of wooden deck over an old rail car supported by old, large	

Г Т	Creek		redwood logs serving as abutments. Structure is
	CIEEK		
			well above stream and not impacting stream
			flow or function. Spur road is stable and
			vegetated.
4	Two Log Haul	Spot-graveling	Spot-graveling operation using rock from pit on
	Road	operation; interview	FMU. Five dump trucks tailgate-spreading coarse
	maintenance	LTO	gravely mix (angular rock) and then Robert Piper,
	project		LTO for and the owner of logging company with
			the crew working on Ironing Board THP, using
			bulldozer to spread, tamp, and shape
			road. Excellent results for road profile for
			drainage and increased ditch volume.
			Interviewed Mr. Piper regarding training,
			oversight by FME foresters, safety, spill
			provisions, and economic issues.
5	Rabbit Ears	Marking and sale set-	Individual tree selection in a young (30-year old)
	2015 THP	up	third-growth redwood-dominated stand with
			many multi-stemmed sprout clumps. Trees
			marked for removal were from all diameter
			classes, with least-desirable stem form/quality or
			issues with crowns and/or heavy to white fir, to
			promote a multi-age stand. 197 acres total, with
			63 acres designated as selection cut and 134
			lightly-stocked acres designated as transition, a
			variant of the selection method to facilitate
			increased volumes and stocking when stands
			don't meet the criteria for selection
			prescriptions. Four trees per acre on average
			were left as "escapement trees" (i.e., wildlife
			trees). FME forester indicated that in future, they
			may create gaps through small patch cuts in the
			stand.
6, 7, 8, 9,	Ironing Board	Active timber harvest;	Underway by Robert Piper Logging (job is 25%
10, 11	THP	new road construction	complete). To date, 317 truckloads hauled
		to facilitate cable	representing 1,334.67MBF gross and
		yarding; 3,100 feet of	1,247.20MBF net.
		abandoned near-	
		stream roads; tractor	Harvest unit is 437 acres total with 404 acres of
		logging on steep	single tree selection regeneration method and
		slopes; two listed plant	33 acres of group selection regeneration

C	Lucit D 1		
6	Ironing Board	Newly constructed spur	Previous entry here created extensive system of
	THP: spur	road	bladed tractor roads including 3,100 feet of near-
	road between		stream roads that were then abandoned. New
	Stands 2 & 4		roads constructed allow for uphill cable yarding,
			protecting streams from sediment and other
			possible impacts. Most side-hill roads are
			partially-benched, one section full-benched; all
			observed have appropriate profile for drainage.
7	Ironing Board	Interview of yarder	Interviewed the contracted loader operator,
	THP: yarder	crew	yarder operator, and landing man. First two had
	site		much experience and on-the-job training.
			Regular tailgate safety training meetings. Regular
			oversight by FME forester with in-person visits by
			forester 1-2 times per week. Confirmed PPE use,
			presence of first aid kit, and spill kit. All receive
			health insurance through their employer, Robert
			Piper Logging.
8	Ironing Board	Marking in Stand 10	This unit had received hardwood removal
	THP: Stand 10		treatment about 20 years ago. Marked to
			remove 1/4 to 1/3 standing volume and is
			consistent with California FPA rules and
			silviculture to improve growth and quality.
9	Ironing Board	Marking in Stand 8	This unit had not had hardwood removal
	THP: Stand 8		treatment. Auditors walked into unit extensively,
			seeing marked but not cut portions, portions
			with felled trees, and portion with trees yarded,
			as well as Class 3 stream within unit, which had
			proper riparian buffer.
10	Ironing Board	Completed harvest and	The harvest of marked trees in this 60-acre unit is
	THP: Stand 11	on-going hardwood	complete. Crews are felling marked undesirable
		control	hardwoods, primarily tanoak, where young
			redwood trees can be effectively released. Many
			hardwoods remain. Minor residual damage.
11	Ironing Board	Closed out, residual	The residual trees in most portions of this unit
	THP: Stand 5	stand following cable-	have little or no residual damage, but significant
		yarding harvest	bark damage observed along a cable-yarding
			corridor (off of Old Growth Road near milepost
			4). Staff explained that this resulted from
			insufficient deflection to keep the logs off of the
			ground by the logging contractor. See OBS
			2017.1 .
			2017.1.

12	Area of	Provisions for	Map showed the location of NSO activity center
	northern	protection of NSO and	based on location of nest tree for 2016.
	spotted owl	its habitat	Reviewed protections, including 100-acre core
	(NSO)		no-cut area and seasonal operating restrictions
	management		within 0.7-mile radius.

5 Octobe	5 October 2017			
North Co	North Coast Timberlands, California: Garcia River Forest FMU			
Site #	Name	Feature of interest	Audit team notes	
	Caspar Office	Logistics for day and district briefing	FME staff provided overview and orientation to Garcia River Forest. The district is 23,740 acres in size with 1/3 designated as ecological reserve. Review of selected field sites, possible changes to include active harvests. Review itinerary for day.	
13	Olsen Gulch Road	Road conditions on main haul road, including many culvert crossings	In 2009-2010, this road received significant road upgrade funded by an EPA mitigation settlement (Pulte Homes), including rolling dips, out-sloped road profile with limited use of inside ditches, critical dips paired with culverts, and all culverts sized for 100-year flood. Road drainage provisions functioning well, with very limited areas with tire-track depressions. Re-grading is scheduled for 2018.	
14	Culvert, Olsen Gulch Road	Culvert design and function	Culverted crossing of Class 2 stream. Bolted-on full-round downspout. Some "bed load" sediment build-up behind the trash racks at the upstream inlets. Water passage through the culvert was not significantly impeded; however, the build-up of material presents a potential source of sediment discharge into the streams and further contributes to the ability for the culvers to efficiently move water, particularly in high-volume storm events. See OBS 2017.2 .	
15	Water Tank	Design and maintenance to avoid damage to fish	Large plastic water tank for road watering. One- inch screened intake pipe is located far upstream	
16	Culvert, Olsen Gulch Road	Culvert design and function	Culverted crossing placed at grade below voluminous fill, which will increase impact to stream when it must be replaced in 30-40 years.	

17	Culvert,	Culvert design and	Culverted crossing of Class 2 spring-fed stream
	Olsen Gulch	function	with a bolted-on half-round downspout. Some
	Road		"bed load" sediment build-up behind the trash
			racks at the upstream inlets. FME staff
			acknowledged that trash racks had not been
			installed correctly. Water passage through the
			culvert was not significantly impeded; however,
			the build-up of material presents a potential
			source of sediment discharge into the streams
			and further contributes to the ability for the
			culvers to efficiently move water, particularly in
			high-volume storm events. See OBS 2017.2 .
18	Culvert,	Culvert design and	Large culvert crossing paired with a nearby small
	Olsen Gulch	function	culvert that is moving water from a small spring
	Road		seep at the base of a legacy landslide that had
			buried the stream channel long ago.
19	Bridge, Olsen	Bridge design and	Bridge design is railcar stringer with a newer
	Gulch Road	function	wooden deck. When this bridge was rebuilt in
			the mid-90s the work included in-stream habitat
			improvement in the Class 1 stream, including
			installation of redwood cross-log weirs to create
			pools and alder log placement that sprouted to
			create stream habitat and shade. Streambank at
			bridge is well armored with boulders and
			vegetation.
20	Garcia River	Ecological Reserve	One of three reserve areas of the forest's ERN.
	Ecological	Network (ERN)	Composed of riparian buffer along Class 1
	Reserve	protection in Garcia	stream, this area is in the Conservation
		River Forest	Easement. Timber harvest and other intensive
			forest management activities only occur in ERN
			lands to further ecological objectives.
21, 22	Olsen Gulch	Active selection harvest	263 acres of second and third-growth redwood
	THP, general	by tractor logging and	forest were selectively marked, removing about
	description	cable skyline logging;	15% of the volume. Portions are inside of the
		NSO activity center;	ERN. As part of THP, company upgraded haul
		road dust	road and selected crossings. There is one NSO
			activity center (MD492) within the plan
			boundary and six others within 1.3 miles. Plan
			states that there is no need to control
			hardwoods in the THP area. This harvest was also
			inspected during the 2016 audit.

			The roads appurtenant to the active harvest on the Olsen Gulch THP had a deep layer of fine, dusty silt powder that was being stirred up by trucks using the road. Water availability limited the extent of the road that could be watered each evening, but dust levels were at problematic levels. The Timberlands Manager for the FME was concerned enough to be exploring options with the LTO to remedy the problem. Dust conditions on the Olsen Gulch THP roads being actively used by the LTO may be at risk of approaching these legal limits. See OBS 2017.4 .
21	Olean Culub	Internieuro utili ITO	
21	Olsen Gulch	Interviews with LTO	Auditors interviewed Darrell Rogers, owner of
	THP, active	and several crew	Rogers and Sons Forest Products, and five crew
	logging site	members	members. Owner is involved in Associated
			California Loggers and used to have ProLogger Certification, but have been unable to keep up
			with the training requirements because of difficulty in getting to training events. Holds
			tailgate safety meetings regularly with crew.
			Confirmed that owner had CPR training, but not
			all members of crew have the training. First aid
			kits, fire extinguishers, fire boxes, and spill kits
			were onsite. Company does not provide health
			insurance to its 20 employees.
22	Olsen Gulch	Residual stand	FME forester inspected water bars on several
~~	THP, active	conditions, close-out	tractor trails that he determined to be
	unit	measures	substandard. He told the crew leader that the
		measures	water bars must be reconstructed to
			standard. There was very minimal residual
			damage. Light selection appropriate to
			silvicultural goals. One wildlife tree marked with
			"W" and other retained trees having good
			wildlife features. WLPZ Class 2 flagged and Class
			3 flagged; both types were protected per FPA
23	Olsen Gulch	Property boundary and	rules. Special Treatment Zone was flagged out.
23	THP, flagged	cutting boundary along	Confirmed that trees along property boundary with neighboring Redwood Empire ownership
	unit	WLPZ buffer	are marked with 2-3 blazes and yellow paint.
			Cutting boundary along WLPZ buffer for Class 2

		stream is clearly flagged.
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	4 October 2017 Success Pond FMU, New Hampshire			
Site #	Name	Feature of interest	Audit team notes	
	Working Forest Fund office	Opening Meeting	Discuss changes in the past year. Review of evidence. Reviewed Success Pond easement language, Working Forest Fund (WFF) Guidelines Digest, and forest management plan. Management plan for Success Pond is currently under review by the State of New Hampshire and will be approved as part of the legal easement. Discussion of how the WFF works with The Conservation Fund and the LandVest Forester to achieve the goals noted in the management plan. Selected field sites and reviewed the itinerary for the day.	
1	Marshall Sale, site 1	Closed harvest (6521- ST-06); large stream crossing removed on edge of main landing	Field review of closed-out 88-acre patch cut with large aspen component, declining aspen and fir removed, irregular boundaries, some retention, including snags and super canopy pines viewed. Full stand not cut due to steep terrain in eastern edge. Osprey in vicinity, noted on harvest documents, property boundary clearly marked. Good use of slash on trails, yellow birch retained on edges and in cut, extensive browse viewed. Coarse woody debris retained with the goal of keeping a wet microsite for natural regeneration and protection from browse. Large stream crossing on edge of main landing – impressive scale of the crossing. Stream is of a relatively small size, however the topography of the crossing included fairly long steep banks, with excellent protection of the water resource and banks. Timber mats were used to cross along with poles, and crossing was heavily brushed in. After crossing was removed, banks were hayed and good natural regeneration was viewed both from the hay seed and natural seed. Harvest completed in spring 2017, landing close- out delayed until July-August due to wet conditions on site and roads. Forester site closeout paperwork not yet completed.	

2	Success Pond Trail, Four Plus Road, and Chicawallopee Road	Infrastructure cost share for road upgrade and maintenance	Road into and out of Marshall Sale, viewed documentation for road and culvert improvement work along this stretch. Reviewed NH Natural Heritage letter from 09/15/17, referencing NHB17-2872 with permit from NH Department of Environmental Services.
3	Marshall Sale, site 2	Overstory removal and free thinning, with additional improvement thinning using a mark-to-cut in select areas	Mechanical crew, good slashing in of roads and protection of retained stems. Operator stayed out of certain areas and protected pulp and pole trees in young stands, bump trees left trailside to protect spruce/fir regeneration. Hemlock is not a prevalent species on the property and was retained where present. Excellent retention of representative species and green tree retention. Boundaries well marked, balsam wood adelgid (BWA) removal – not specifically noted in initial prescription as harvest plan cruise was completed before BWA was identified as the reason for the drop, BWA information noted in GIS. Maintained enough canopy to limit white and yellow birch epicormic sprouting.
4	Marshall Sale – site 3	Critical wetland habitat protection district (PS3B); Stearns Brook; patch cuts	Viewed the 400-foot buffer on the PD3 stream. Differing prescriptions noted within a 10-year period from the stream edge out to 200 feet and in the 201-foot to 400-foot buffer area. Harvest parameters can be exceeded with permission from the State of NH. At this site, the normal regulated prescription was used in consultation with the NH Fish and Game (F&G) Department's wildlife biologist; in an adjacent harvest, permission was sought to exceed the NH F&G Department's parameters for a protection district and was approved due to declining balsam fir present. Viewed old retained patches that were left for habitat variety. Retention patches within the 400-foot protected area.
5	Grande Marie	Closed harvest (6521- ST-04); adjacent to Marshall Sale, protection district –	Field review of 269-acre closed-out harvest: OSR and combined group and individual tree selection, as well as free thinning. Mechanical crew, winter sale needed frozen conditions due to wet soils. Log landings showed good

[
		deer wintering area	utilization, low residual stem damage, and with regeneration protected.
			Marten habitat at north side of sale noted on maps. Retained large white pines for osprey habitat.
			Larger patch cuts in an area of declining softwood. Patch cuts are beneficial to wildlife habitat; this stand type may be used by lynx.
			Protection district – deer wintering yard: balsam fir is collapsing. Deer wintering area protection district respected, with exception granted for stand 1422 by NH F&G Department for some additional thinning to remove fir due to forest health problem with BWA. NH F&G Department's wildlife biologist visited the site and approved silvicultural prescription edits to exceed regulated opening size in the Protection District due to balsam decline and the need for patches of early successional habitat in protection district. Excellent written communication with the wildlife Biologist.
			Stream crossing viewed. Permitted by state – metal stringers with wooden deck in good condition.
			Viewed landowner letter asking permission to train bird dogs on FME's property.
6	Leavitt Stream	Closed harvest (6521- ST-02); stream crossing, legal right-of-way on	Field review of 443-acre closed-out harvest. Feller buncher and grapple skidder, winter sale with frozen conditions.
		private woods road	Legal right of way on private road used to access the sale. Boundary line clearly viewed on edge of property. Stream crossing permitted 02/20/14 and well completed. Moose trail evident at stream.
			Inspection forms viewed from multiple dates between January to March 2016, including one from 03/14/16 with note to pull bridge after all wood is trucked.

3.1.2 Total Time Spent on Evaluation

Α.	Number of person-days days spent on-site assessing the applicant:	5
В.	Number of auditors participating in on-site evaluation:	3
С.	Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	6.5
D.	Total number of person days used in evaluation:	11.5

3.1.3 Evaluation Team

Auditor Name:	Stefan A. Bergmann	Auditor role:	Lead Auditor, FSC	
Qualifications:	Mr. Bergmann has been in the forestry and wood products field for 15 years, working			
	across the US in forest policy, landowner extension, executive leadership, and forest			
	certification. Prior to joining SCS in July 2017, he previously worked for Rainforest			
	Alliance, overseeing the Forest Stewardship Council™ (FSC®) forest management			
	auditing program in the US. He has successfully completed Lead Auditor Training for			
	FSC forest management and chain-of-custody, and he has participated as an auditor			
	on several forest management audits. He holds a BS in Wildlife Science and an MS in			
	Forest Resources, both from Oregon State University, Corvallis, Oregon, USA, and is presently pursuing an MBA at the University of California Davis.			
Auditor Name:	Michelle L. Matteo	Auditor role:		
			Audit Team Member, FSC & SFI	
Qualifications:	Michelle L. Matteo is a senior lead auditor for SCS based in Southern New England.			
	Michelle is a forester and arborist and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Arborist Certification.			
	Michelle has completed a 3-day ISO 19011 training designed & presented in relation			
	to the FSC Standards, completed hundreds of CoC and FM audits, certification audits			
	of the Northeast Master Logger program, and is a lead auditor for Forest			
	Management audits. She earned an MS in Forestry and BS in Wildlife & Fisheries			
	Biology, both from the University of Massachusetts.			
Auditor Name:	Mike Ferucci	Auditor role:	Lead Auditor, SFI	
Qualifications:	Mike is a founding partner and Pres	ident of Interfor	est, LLC where he is responsible	
	for the assembly and management of	•	•	
	managers to solve complex forestry problems. He is also responsible for the firm's			
	forest certification program, which includes SFI and FSC certification and preparation			
	services. Mike is also the SFI Program Manager for NSF – International Strategic			
	Registrations and is responsible for all aspects of the firm's SFI Certification programs.			
	He has a B.Sc. degree in forestry from the University of Maine and a Master of			
	Forestry degree from the Yale School of Forestry and Environmental Studies. Mike			
	has 27 years of forest management experience. He has conducted or participated in			
	assessments of forest management on more than 14 million acres of forestland in 27			
	states.			

3.2 Evaluation of Management System

3.2.1 Methodology and Strategies Employed

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

3.2.2 Pre-evaluation

X A pre-evaluation of the FME *was not* required by FSC norms.

A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

3.3 Stakeholder Consultation Process

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

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

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

FME Management and staff	Pertinent Tribal members and/or representatives
Consulting foresters	Members of the FSC National Initiative
Contractors	Members of the regional FSC working group
Lease holders	FSC International
Adjacent property owners	Local and regionally-based environmental
	organizations and conservationists
Local and regionally-based social interest and civic	Forest industry groups and organizations
organizations	
Purchasers of logs harvested on FME forestlands	Local, state, and federal regulatory agency
	personnel
Recreational user groups	Other relevant groups

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments. The table below summarizes the major comments received from stakeholders and the assessment team's response. Where a stakeholder

comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

Stakeholder Comments	SCS Response
Economic	
TCF pays its contractors well. They also pay like clockwork, which is critical for a business owner and unusual for many area companies.	This feedback is consistent with other evidence gathered confirming that TCF pays contractors at competitive rates and makes payments promptly.
There have been some delays in implementation of grant- funded projects on its property, but these delays were mostly unforeseeable and not caused by The Conservation Fund. Disagree that TCF purchased equipment for one logger who	Since these delays were not caused by TCF, the auditors see no cause for alarm. TCF has demonstrated a commitment to seeing this grant-funded work to fruition. While SCS is unaware of all the factors
does a lot of work for the FME. It would have been better (more fair) if more loggers had been involved. Social	that went into this business decision, it is not in violation of the FSC standard.
They reach out to the surrounding community for feedback and lead planned logging operations and watershed walks 2 or 3 times a year so we the public can see what's happening there and give our feedback, which The Conservation Fund staff accepts and take seriously.	The pre-harvest walks with community members help TCF head off potential issues and also bring local stakeholders on board. This practice contributes to TCF's conformance to the FSC standard.
TCF is a posterchild of how a company should operate in the community and on the land. They grow and harvest trees in an environmentally-sensitive manner, improve the health of the forest, and treat their employees and contractors well.	This comment is consistent with others that the audit team heard about TCF's sensitivity to local community concerns and the equality with which it treats its staff.
TCF staff are always available if contractors have questions or if issues come up. Scott Kelly (North Coast Timberlands forester) knows what he wants and works effectively with contractors in a fair way to achieve those goals.	Effective communication of FME staff was a common theme among interviewed contractors and external stakeholders and was apparent though interactions with the audit team.
Everyone who works at TCF is great! They're really bright and care about what they are doing. They are also committed to the local community. TCF staff is responsive to concerns and are willing to listen to and consider all perspectives.	This linkage with the local community and their responsiveness were evident during the audit team's interactions with TCF staff.
For the most part, the local community is unaware that The Conservation Fund is in the area. However, the FME does make an effort to reach out to the community, e.g., they walk people in the woods before THPs are implemented. They are doing all the right things to engage with locals.	Engaging with the local community is an important goal for TCF. Staff make a concerted effort to record and respond to issues that arise, buy local and use local contractors, and be present at educational events in the community (such as school presentations).
TCF is very transparent with their decisions, planning, and data. This helps the organization to gain the trust of locals.	TCF's transparency is impressive. Forest management plans, monitoring results,

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

It also sets itself apart from other forestry organizations and companies in the area.	and other documents associated with its forest management activities are posted on its website and made available to anyone who asks.
Environmental	
I'm very impressed with the Conservation Fund's management of their Salmon Creek forestland. I was critical of the previous owner's mismanagement there but have no criticism of this new owner's actionsThey have also done many things to repair environmental damage inflicted by previous timber corporations. I can't think of a better steward of my watershed's forestland.	The improvement in TCF's management compared with previous landowners was a common thread that emerged in stakeholder interviews. Interviews with FME staff also helped the auditors understand the differences between TCF's management style and that of previous owners.
Depending on the project, TCF ensures that contractors are properly trained—e.g., on RTE protections.	Training records and observations of contractors working on active harvests confirmed this training, which is essential to properly implementing TCF's management activities.
Very happy with the progressive forest management that The Conservation Fund has been conducting on its property. The Conservation Fund is easy to work with and conservation minded. I do not have any concerns with the way The Conservation Fund manages its property.	This comment reflects others that the auditors heard from stakeholders.
The Conservation Fund is doing good things. I don't know any problems with them.	This comment reflects others that the auditors heard from stakeholders.
The tanoak issue and the hack-and-squirt management practice is a tough one. Tanoak should not be viewed as a liability; non-chemical methods of control should be explored.	TCF has responded to community concerns about the use of herbicides by limiting its use on the properties on the California North Coast. They have experimented with non-chemical means of control, too.

4. Results of The Evaluation

Table 4.1 below, contains the evaluation team's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

Principle / Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the	
		Standard	
P1: FSC Commitment	No violations, complaints or	Dust levels on actively-used logging	
and Legal Compliance	investigations have been received	road at problematic levels and at risk	
	since the last annual audit.	of approaching legal limits at site in	
		North Coast Timberlands. See OBS	
	On North Coast Timberlands, TCF	2017.4.	

	provides protection from illegal and	
	unauthorized activities on the forest	
	by gating most access avenues and	
	keeping the gates locked. They also	
	hire a patrol person to look for illegal	
	access and activities, as well as fly	
	the property annually to search for	
	illegal marijuana grows.	
	On both North Coast and Success	
	Pond parcels, TCF foresters or	
	contracted foresters conduct	
	standard pre-operation meeting with	
	each contractor is conducted to	
	cover the specifics of the project,	
	including reviewing applicable	
	forestry laws and regulations. They	
	also conduct site visits at least once	
	or twice a week during active	
	operations.	
P2: Tenure & Use	Boundaries clearly marked both on	none
Rights &	the ground and on maps. Titles,	none
Responsibilities	deeds, easements—including	
Responsibilities		
	conservation easements—are all	
	clearly defined and in line with	
	standard legal practices. Records of	
	disputes are kept on file along with	
	what actions were implemented to	
	address the dispute or issue.	
P3: Indigenous Peoples'	For all THPs in North Coast	Opportunity at Success Pond to
Rights	Timberlands, consultation with	improve outreach to locally-
	Native American tribes, per state	recognized indigenous groups for
	law, is conducted. Protection	referenced in the FMP. See OBS
	measures for archeological sites are	2017.6.
	implemented during harvest.	
P4: Community	Contractors report that TCF is	none
Relations & Workers'	excellent to work with—staff are	
Rights	communicative and the organization	
	pays competitive rates. Local	
	contractors and suppliers are utilized	
	whenever there are qualified local	
	contractors and suppliers available.	
	Employees report that they enjoy	
	their jobs, believe that TCF is a	
	health place to work, they are	
	provided with job advancement and	
	professional development	
	opportunities, and the organization	
	providences, and the organization	

	offers competitive wages and	
	benefits.	
P5: Benefits from the	Utilization standards are very high.	Residual damage at site in North
Forest	TCF staff are close to the local	Coast Timberlands along cable-
FUIESL	communities and aware of the	yarding corridor. See OBS 2017.1 .
	organization's impact on the local	
	economy. TCF is clearly focused on	
	supporting and contributing to the	
	local economy through its hiring of	
	local contractors and supplying local	
	mills and markets.	
	For North Coast Timberlands, TCF	
	annually calculates their estimated	
	local economic impact (taxes, wages,	
	contractors, local suppliers, etc.). The	
	annual report includes the Caspar	
	Index, which is a measure of the	
	cultural, environmental, economic,	
	and social activities of TCF locally.	
P6: Environmental	Auditors found numerous examples	Culverted crossings with bed load
Impact	of management activities designed	sediment at sites in North Coast
	to reduce negative impacts, including	Timberlands build up an incorrectly
	using low impact logging techniques,	installed trash racks. See OBS 2017.2 .
	altering harvest plans to	
	accommodate RTE and other species	Re-evaluation of RSA policy overdue
	of concern, use of streamside	for North Coast Timberlands. See
	management zones, and the focus	Minor CAR 2017.3.
	on uneven aged management. Any	
	RTE species listed on state natural	Dust levels on actively-used logging
	heritage databases for active harvest	road at problematic levels and at risk
	units are assumed to be present, and	of approaching legal limits at site in
	sensitive practices are implemented	North Coast Timberlands. See OBS
	with this in mind.	2017.4 .
		2017.4.
	North Coast Timberlands	
	management modifications for RTE	
	and sensitive species includes NSO	
	protection, fisheries habitat	
	enhancement projects, road	
	improvement projects, HCV	
	management and monitoring, and	
	species composition management.	
	Management at Success Pond was	
	modified to address RTE species, too.	
	These included road improvement	
	projects, HCV management and	
	projects, nev management and	

	monitoring, and streamside buffer	
	protection measures.	
D7: Management Dian	-	nono
P7: Management Plan	The management plans for these parcels incorporate the results of	none
	various evaluations of social impacts	
	of the ownerships on local	
	communities, include detailed	
	harvest rate projections with a	
	description of how the underlying calculations were made, and	
	monitoring procedures for yield of all	
	forest products, growth and	
	regeneration rates, composition and	
	changes to flora and fauna,	
	environmental and social impacts,	
	and cost, productivity, and efficiency	
	of forest management	
P8: Monitoring &	Inventory plots are established as	none
Assessment	part of TCF's forest carbon	
	assessment. Additionally, an	
	inventory of timber is conducted	
	approximately every 10 years,	
	including permanent plots on some	
	forests that are re-measured to	
	assess forest growth. Pre- and post-	
	harvest cruises are conducted for	
	harvest sites.	
	Monitoring of RTE species occurs	
	prior to harvest when such species	
	have been identified on state	
	database.	
	Security personnel and foresters	
	continuously monitor the road	
	system conditions on the forests.	
	, After the first big rain even of the	
	wet season or after major storms,	
	FME personnel drive the roads to	
	assess any damage needing repairs.	
	TCF is very open about the results of	
	monitoring. A summary is produced	
	in its annual reports and made	
	available online and to interested	
	stakeholders.	
P9: High Conservation	TCF has conducted HCVF and RSA	none
Value Forests	analyses for are sampled FMUs.	
value rulests	analyses for are sattified fivios.	

	Consultation with TCF's Advisory	
	Council (North Coast Timberlands)	
	and conservation biology and	
	ecology experts was conducted as	
	part of the HCVF and RSA	
	assessments. All ecologically-	
	significant natural community	
	features are described and mapped	
	in the management plans and policy	
	digest.	
P10: Plantations	NA	NA
Chain of custody	TCF's control system includes	none
	labeling trip tickets with the FSC	
	claim and code, which accompany	
	each log load from the forest to its	
	destination.	
Group Management	NA	NA
Trademark Standard		On website and in Garcia River IRMP,
		the acronym "FSC" if missing a
		trademark symbol. Also, no record of
		approval of the use of trademarks for
		the Garcia River IRMP in the North
		Coast Timberlands. See Minor CAR
		2017.5.

4.2 Process of Determining Conformance

4.2.1 Structure of Standard and Degrees of Nonconformance

FSC-accredited forest stewardship standards consist of a three-level hierarchy: principle, the criteria that correspond to that principle, and the performance indicators that elaborate each criterion. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each nonconformance must be evaluated to determine whether it constitutes a major or minor nonconformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in nonconformance. The team therefore must use their collective judgment to assess each criterion and determine if the FME is in conformance. If the FME is determined to be in nonconformance at the criterion level, then at least one of the applicable indicators must be in major nonconformance.

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

4.2.1 Interpretations of Major CARs, Minor CARs and Observations

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

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

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

4.2.2 Major Nonconformances

x	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.

4.2.3 Existing Corrective Action Requests and Observations

			Finding Number: 2015.3
Select one: 🗌 Ma	lajor CAR 🛛 🗌 Minor CAR	X Observation	
FMU CAR/OBS issue	FMU CAR/OBS issued to (when more than one FMU): North Coast (California)		
Deadline	 Pre-condition to certification 3 months from Issuance of Fina Next audit (surveillance or re-event) Other deadline (specify): none 		
FSC Indicator:	FSC-US Forest Management Standa	rd v1.0, 7.1	

Non-Conformity (or Background/ Justification in the case of Observations):

The Buckeye FMU was acquired in 2013 and a 2ND draft of the management plan has been prepared by TCF and has undergone a first round of review and modification. The draft management plan is in the final review process with the Advisory Committee and Sonoma County. The timeline for the completion of the review is beyond the control of TCF, therefore this item is issued as an observation. While review and final adoption is underway, TCF adopted a policy of no action on the Buckeye FMU. This provides protection to any resources present on the FMU. The resources on the Buckeye FMU are also protected under the general management guidelines in place for all of the TCF WFF FMUs.

Corrective Action Request (or Observation): TCF should expedite the process of adoption of the management plan for the Buckeye FMU.

FME response	2016 FME Response
(including any	TCF staff have been working with both the advisory committee and Sonoma
evidence submitted)	County in an attempt to get final approval of the IRMP for the Buckeye FMU.
enachee submittedy	Chronology of events since October 2015 regarding the Buckeye Integrated
	Resource Management Plan to the easement holder; the Sonoma County
	Agricultural Preservation and Open Space District.
	September 24, 2015: Second draft of the IRMP submitted by TCF to the County.
	November 6, 2015: TCF received a response letter from the County with additional
	items to be inserted in IRMP.
	December 10, 2015: TCF sent a response letter and updated IRMP.
	January 26, 2016: The County asked for additional clarification on items and TCF
	responded.
	February 2, 2016: TCF and the County have an in-person meeting to come to an
	agreement regarding the Public Access portion of the IRMP, which is the only
	outstanding issue.
	March 11, 2016: Scott Kelly sent an email to the County requesting an update on
	the status of IRMP approval.
	April 19, 2016: The County sent a letter to TCF regarding the public access issues.
	The letter contains the following text regarding approval of the IRMP: This letter
	follows up on our meeting of February 1, 2016, and your latest version of the draft
	Buckeye Forest Integrated Resource Management Plan ("IRMP"), which is dated
	January 26, 2016, and which appendices are dated February 1, 2016. Except in
	regard to the Recreational Use Plan, we are satisfied that the IRMP meets the
	requirements of the District's conservation easement ("Easement").
	April 22, 2016: TCF responded to the letter with an email requesting that TCF and
	the County enter into a Memorandum of Understanding as a way to move forward
	with approval of the IRMP while committing to work together on public access.
	May 9, 2016: TCF sent an email to the County requesting that we move forward on
	the MOU before TCF has our FSC & SFI certification audits in October.
	May-August 2016: Negotiations were ongoing with TCF and the County on the
	language in the MOU.
	August 19, 2016: A MOU is agreed upon by TCF, the County staff and the CA
	Coastal Conservancy (a major funder of the purchase of the property).
	September 1, 2016: TCF received an email that the County: It looks like we'll be
	bringing the MOU to our Board for its initial consideration in closed session on Oct
	18. Final approval of the MOU will need to occur in an open session board action
	to follow, likely in early November. The reason for this delay is that we need to
	first meet with department heads from County General Services, Regional Parks,
	and Transportation & Public Works to discuss Kelly Road as it relates to Soda
	Springs Reserve.
	Springs reserve.
	2017 FME Response
	The Buckeye IRMP was approved March 6, 2017, per the attached letter.
	The buckeye main was approved march 0, 2017, per the attached letter.

SCS review	2016 SCS Review Since the final approval of the Buckeye FMP is dependent upon outside entities and TCF staff have been diligently working to obtain that final approval, Observation 2015.3 will be extended for up to another year awaiting action by the outside entities that must approve the IRMP. TCF should report the final approval to the CB as soon as that is obtained.
	2017 SCS Review The FME's activities in 2016 (outlined above) demonstrate that FME staff were diligently seeking adoption of the Buckeye IRMP in response to the CAR. In a letter dated March 6, 2017 from the Sonoma County Agricultural Preservation and Open Space District, which was provided to the auditors this year, the Buckeye IRMP is described as being consistent with the easement and therefore approved.
	This fully addresses OBS 2015.3.
Status of CAR:	X Closed Upgraded to Major
	U Other decision (refer to description above)

	Finding Number: 2016.1	
Select one: 🗌 Maje	or CAR X Minor CAR Observation	
FMU CAR/OBS issued	to (when more than one FMU): North Coast (California)	
Deadline	 Pre-condition to certification 3 months from Issuance of Final Report 	
	X Next audit (surveillance or re-evaluation)	
	Other deadline (specify): none	
FSC Indicator:	FSC-US Forest Management Standard v1.0, 7.2.a	
Non-Conformity (or B	ackground/ Justification in the case of Observations):	
The Garcia River FMU	Management Plan was approved in August 2006. According to the GR-IRMP on	
page 121 there is a re	quirement that the plan be updated at least once every ten years. The FSC	
	he management plan undergo a "full revision" at least every ten years. Since the	
	August 2006, more than 10 years have elapsed and there is no full revision in place.	
Corrective Action Rec	uest (or Observation):	
TCF must complete and obtain approval for a full revision of the GR-IRMP and submit it for approval. The		
timing for revision of the other FMU FM Plans should be reviewed and plans made to maintain currency		
of the management plans.		
FME response	IRMP update planning document attached.	
(including any	Garcia River IRMP was submitted to the easement holder, The Nature	
evidence submitted)	Conservancy, and the primary funder, California State Coastal Conservancy on	
	August 7, 2017. Comments were received from SCC on September 18, 2017 and	
	from TNC on September 20, 2017. TCF will respond ASAP with an updated version	
	for approval. Please see attached email exchange regarding IRMP updates. A web link to the draft updated IRMP is included in the email.	

SCS review	The FME undertook a complete revision of the Garcia River IRMP, which led to a longer than anticipated delay in approval. Auditors confirmed that the FME has received comments from The Nature Conservancy and California State Coastal Conservancy. A draft plan with comments from the conservation easement holder was provided to the auditors. Staff are in the process of reviewing the feedback of these partners. No significant issues are envisioned in finalizing the IRMP, and final approval of the IRMP is expected by the end December 2017.
	This addresses CAR 2016.1.
Status of CAR:	X Closed Upgraded to Major
	U Other decision (refer to description above)

	Finding Number: 2016.2
Select one: 🗌 Maj	or CAR Minor CAR X Observation
FMU CAR/OBS issued	l to (when more than one FMU): North Coast (California)
Deadline	 Pre-condition to certification 3 months from Issuance of Final Report
	X Next audit (surveillance or re-evaluation)
	U Other deadline (specify): none
FSC Indicator:	FSC-US Forest Management Standard v1.0, 7.4.a
• •	ackground/ Justification in the case of Observations):
	o provide the management plan summaries and monitoring result summaries which
	ublic. The monitoring results have a link on TCF's website for obtaining monitoring
	roved IRMP's are available on TCF's website, although navigating to them is not an
Fire website.	e SYP Option A is not available on TCF's website, although it is available on the Cal
	weet (o) () TCE should any ide a many divest with after institution to the
	quest (or Observation): TCF should provide a more direct path of navigation to the
summary to fulfill this	ption A plan on the Cal Fire website for the public or provide another public
FME response	Each project page now has link to the related IRMP and a link to the reference
(including any	documents page, which contains a link to SYP Option A
evidence submitted)	https://www.conservationfund.org/projects/north-coast-forest-conservation-
evidence submittedy	initiative/north-coast-reference-documents
	https://www.conservationfund.org/projects/buckeye-forest
	https://www.conservationfund.org/projects/big-river-and-salmon-creek-forests
	https://www.conservationfund.org/projects/garcia-river-forest
	https://www.conservationfund.org/projects/gualala-river-forest
SCS review	The current website for the FME is easy to navigate and contains each IRMP and
	the Sustained Yield Plan Option A in accessible locations.
	This fully addresses OBS 2016.2.

Status of CAR:	X Closed
	Upgraded to Major
	Other decision (refer to description above)

	Finding Number: 2016.3
Select one: 🗌 Maj	or CAR X Minor CAR Observation
FMU CAR/OBS issued	to (when more than one FMU): North Coast (California)
Deadline	Pre-condition to certification
	3 months from Issuance of Final Report
	X Next audit (surveillance or re-evaluation)
	Other deadline (specify): none
FSC Indicator:	FSC-US Forest Management Standard v1.0, 7.3.a and SCS FSC Chain of Custody
	Indicators for Forest Management Enterprises, Ver. 5-1: 12/03/12, 5.1 and 5.2
•	ackground/ Justification in the case of Observations):
	that all forest workers are provided with sufficient guidance and supervision to
	t their respective components of the plan. During discussions on training provided
	determined that the COC training provided to the LTO's is not formally organized,
	In addition, since the sales of logs are delivered log sales and the COC must be
	l gate, the trucking contractor must also receive COC training. The trucking
	ses is a subcontractor of the LTO.
Corrective Action Rec	•
-	C training for the LTO and assure that the subcontractors are also provided the
	ne FME shall maintain up-to-date records of its COC training and/or communications
	t of trained employees, completed COC trainings, the intended frequency of COC
• • • • •	plan), and related program materials (e.g., presentations, memos, contracts,
employee handbooks	
FME response	In the attached COC policy, Section 7 contains the training plan. This policy is
(including any evidence submitted)	provided to LTO's when they sign a logging contract. Scott Kelly provided a COC
evidence submitted)	training to Robert Piper Logging on April 5, 2017 and McFarland Trucking on Saturday, May 6, 2017. Please see attached documentation.
SCS review	The FME has held several COC training session for its LTOs about the procedures
	for the COC/FM system. Auditors reviewed training sign-in sheets. Interviewed
	LTOs demonstrated sufficient knowledgeable about the FME's system for
	maintaining the FSC chain of custody of harvested forest products.
Status of CAR:	X Closed
	Upgraded to Major
	Other decision (refer to description above)

4.2.4 New Corrective Action Requests and Observations

	Finding Number: 2017.1
Select one: 🗌 Maj	or CAR Minor CAR X Observation
FMU CAR/OBS issued	l to (when more than one FMU): North Coast (California)
Deadline	 Pre-condition to certification 3 months from Issuance of Final Report Next audit (surveillance or re-evaluation) Other deadline (specify): none
FSC Indicator:	FSC-US Forest Management Standard v1.0, Indicator 5.3.b
Non-Conformity (or Background/ Justification in the case of Observations): Residual damage was observed by auditors in Stand 5 of the Ironing Board THP, a closed-out harvest on the Big River Forest, near milepost 4 (Site 11). The damage was greatest along a cable-yarding corridor. Staff explained that this resulted from insufficient deflection to keep the logs off of the ground by the logging contractor. Bark damage was significant to the extent that the health and growth of damaged trees was noticeably affected. Since this condition was detected at only one location and therefore appears to be an isolated event, an OBS and not a CAR is appropriate.	
Corrective Action Request <i>(or Observation)</i> : The FME should ensure that harvest practices are managed to protect residual trees and other forest resources, including residual trees not being significantly damaged to the extent that health, growth, or values are noticeably affected.	
FME response (including any evidence submitted) SCS review Status of CAR:	Closed Upgraded to Major Other decision (refer to description above)

		Finding Number: 2017.2
Select one: 🗌 Maj	or CAR Minor CAR X Observation	
FMU CAR/OBS issued	to (when more than one FMU): North Coast (California)	
Deadline	 Pre-condition to certification 3 months from Issuance of Final Report Next audit (surveillance or re-evaluation) Other deadline (specify): none 	
FSC Indicator:	FSC-US Forest Management Standard v1.0, Indicator 6.5	i.d

Non-Conformity (or Background/ Justification in the case of Observations):

Two of three culverted crossings examined along Olsen Gulch Road in the Garcia River Forest had "bed load" sediment build-up behind the trash racks at the upstream inlets. Additionally, staff acknowledged that trash racks had not been installed correctly. Water passage through the culverts was not significantly impeded; however, the build-up of material presents a potential source of sediment discharge into the streams and further contributes to the ability for the culvers to efficiently move water, particularly in high-volume storm events.

Corrective Action Request (or Observation):

The FME's transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, should be designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, soil and water disturbance and cumulative adverse effects and include measures to minimize sediment discharge to streams.

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

		Finding Number: 2017.3
Select one: 🗌 Maj	or CAR X Minor CAR Observation	
FMU CAR/OBS issued to (when more than one FMU): North Coast (California)		
Deadline	 Pre-condition to certification 3 months from Issuance of Final Report Next audit (surveillance or re-evaluation) Other deadline (specify): none 	
FSC Indicator:	FSC-US Forest Management Standard v1.0, Indicator 6.4.	d

Non-Conformity (or Background/ Justification in the case of Observations):

The FME 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,* prepared by the FME in August 2005, provides a collection and synthesis of conservation plans in the North Coast.

Based on this and other work, the FME has concluded that because of the widespread protected nature of lands in the region, the regulatory system restricting land use change and harvest practices, and the existing pattern of habitat conditions and ecological processes present on the landscape, designating RSAs on their property is unnecessary and would not be ecologically beneficial (see policy document, *The Conservation Fund North Coast Forest Conservation Program Policy Digest*; July 2017 version). The FME further concludes that HCVFs on their properties protect the ecological values that RSAs supply.

In the North Coast Forest Conservation Program Policy Digest, the FME commits to re-evaluating its decision on RSAs at least every 10 years, with stakeholder input, as part of planned updates to its management policies. The FME's forestry staff confirmed that no such re-evaluation of its RSA policy has been conducted since the August 2005 collection and synthesis of all of North Coast conservation plans, and thus the re-evaluation is overdue.

Corrective Action Request (or Observation):

The FME shall ensure that the RSA assessment is reviewed at a minimum once every 10 years in order to determine if the need for RSAs has changed. Designation of RSAs must be revised as a result of this review, as necessary.

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

			Finding Number: 2017.4
Select one: 🗌 Maje	or CAR 🛛 Minor CAR	X Observation	
FMU CAR/OBS issued	to (when more than one FMU):	North Coast (California)	
Deadline	Pre-condition to certification 3 months from Issuance of X Next audit (surveillance or	Final Report	
	Other deadline (specify): no	one	
FSC Indicator:	FSC-US Forest Management Sta	andard v1.0, Indicators 6.5	.d
Non-Conformity (or Background/ Justification in the case of Observations):			
The roads appurtenant to the active harvest on the Olsen Gulch THP in the Garcia River Forest on the day			
the auditors reviewed them had a deep layer of fine, dusty silt powder that was being stirred up by trucks			
using the road (see notes for Sites 21 and 22). Water availability limited the extent of the road that could			
be watered each evening, but dust levels were at problematic levels. The Timberlands Manager for the			

FME was concerned enough to be exploring options with the LTO to remedy the problem.

Corrective Action Rec	uest (or Observation):	
The FME's transportation system, including design and placement of permanent and temporary haul		
roads, skid trails, recr	eational trails, water crossings and landings, should be designed, constructed,	
maintained, and/or re	econstructed to reduce short and long-term environmental impacts, soil and water	
disturbance and cumulative adverse effects and include measures to minimize ecological impacts,		
erosion, and sedimen	t discharge into streams.	
FME response		
(including any		
evidence submitted)		
SCS review		
Status of CAR:	Closed	
	Upgraded to Major	
	U Other decision (refer to description above)	

	Finding Number: 2017.5	
Select one: 🗌 Maj	or CAR X Minor CAR Observation	
FMU CAR/OBS issued	l to (when more than one FMU): North Coast (California)	
Deadline	Pre-condition to certification	
	3 months from Issuance of Final Report	
	X Next audit (surveillance or re-evaluation)	
	Other deadline (specify): none	
FSC Indicator:	SCS FSC COC Indicators for FMEs, Version 5-0, Indicators 3.1, 3.2, and 3.3 FSC Trademark Standard (FSC-STD-50-001), Indicators 1.15 and 1.16	
Non-Conformity (or B	ackground/ Justification in the case of Observations):	
The FME is using the FSC trademark in publicly-facing materials, including on its website, annual reports, and IRMPs. It has approval for use of the trademark on the website and their annual reports. However, on the website for the Working Forest Fund (<u>https://www.conservationfund.org/our-work/working-</u>		
	on), the acronym "FSC" is missing a trademark symbol. Additionally, FSC trademarks	
in the Garcia River IRMP lack the trademark symbols; there is also no record of approval of the use of		
trademarks for the Garcia River IRMP. Corrective Action Request (or Observation):		
The use of the trademark symbol [®] (in superscript font) must accompany the first use of "FSC" and		
"Forest Stewardship Council" in any text (Indicator 1.15). All FSC trademark uses must be been submitted		
to SCS for approval (Ir		
FME response		
(including any		
evidence submitted)		
SCS review		
Status of CAR:	Closed	
	Upgraded to Major	
	Other decision (refer to description above)	
<u></u>		

Finding Number: 2017.6

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Select one: 🗌 M	ajor CAR	Minor CAR	X Observation		
FMU CAR/OBS issued to (when more than one FMU): Success Pond (New Hampshire)					
Deadline	Pre-cond	Pre-condition to certification			
	3 month	s from Issuance of	Final Report		
	X Next audit (surveillance or re-evaluation)				
		adline (specify): n			
FSC Indicator:			andard v1.0, Indicator 3.3.a		
		~	ase of Observations):		
• •	-	-	s Pond Tract identifies four communities of		
indigenous people i	n the Success Po	nd area. TCF has c	conducted outreach to two of the communities of		
indigenous people (currently, there	are no federally-re	ecognized tribes in New Hampshire), however there		
is an opportunity to	improve outrea	ch to other locally	recognized indigenous groups referenced in the		
management plan.					
Corrective Action R	equest (or Obse	rvation):			
-			nunities of indigenous people in their consultation		
	to identify sites of current or traditional cultural, archeological, ecological, economic, or religious				
significance.					
FME response					
(including any					
evidence submitted,)				
SCS review					
Status of CAR:	Closed				
	Upgrade	d to Major			
	🗌 🗌 Other de	cision (refer to des	scription above)		

5. Certification Decision

Certification Recommendation				
FME be awarded FSC certification as a "Well-				
Managed Forest" subject to the minor corrective	Yes 🗴 No 🗌			
action requests stated in Section 4.2.				
The SCS evaluation team makes the above recomme	ndation for certification based	on the full and		
proper execution of the SCS Forest Conservation Pro	gram evaluation protocols. If a	certification is		
recommended, the FME has satisfactorily demonstrated the following without exception:				
FME has addressed any Major CAR(s) assigned during the evaluation. Yes X No				
FME has demonstrated that their system of manage	Yes X No			
that all of the requirements of the applicable standards (see Section 1.6 of this				
report) are met over the forest area covered by the scope of the evaluation.				
FME has demonstrated that the described system of	Yes X No			
implemented consistently over the forest area covered by the scope of the				
certificate.				
Comments:				

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – Current and Projected Annual Harvest for Main Commercial Species

Per Section 1.2.1 of report, below is the AAC for each FSC-certified FMU. Actual harvest figures far well below the ACC allowed for in forest management growth and yield planning models.

<u>FMU</u>	AAC
Garcia River Forest, CA	1.5 MBF
Gualala Forest, CA	1.5 MBF
Salmon Creek Forest, CA	1 MBF
Big River Forest, CA	4 MBF
Buckeye, CA	5 MBF
Penfield Forest, PA	1,480 tons
Success Pond, NH	7,073 tons
McConnell Pond, VT	3,600 tons
East Grand Lake, ME	4,528 tons
Cranberry Lake, NY	2,339 cords
Reed Plantation, ME	5,500 cords

Appendix 2 – List of FMUs Selected for Evaluation

FME consists of a single FMU

X FME consists of multiple FMUs or is a Group

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

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other – please describe
Big River Forest	rest non-SLIMF: 11,770 ac		FMU is actively managed
Garcia River Forest	non-SLIMF: 24,000 ac	natural forest	FMU is actively managed
Success Pond non-SLIMF: 8,9		natural forest	due for evaluation

Appendix 3 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation
			method

David Whitehouse	Forest Operations	dwhitehouse@conservationfund.org	in person
	Manager, Working Forest	Phone: 919-951-0118	
	Fund	North Carolina Office	
Scott Kelly	Timberlands Manager	skelly@conservationfund.org	in person
		707-272-4497	
		Ukiah Office, CA	
Holly Newberger	North Coast Program	hnewberger@conservationfund.org	in person
	Coordinator	Phone: 707-962-0712	
		Casper Office, CA	
Lauren Fety	Forest Analyst	lfety@conservationfund.org	in person
		541-727-2094	
		Ukiah Office, CA	
Madison Thomson	Registered Professional	mthomson@conservationfund.org	in person
	Forester	707-272-4497	
		Ukiah Office, CA	
Parker Jean	Forestry Technician	pjean@conservationfund.org	in person
		972-322-2778	
		Caspar Office, CA	
Trevor Cutsinger	Business Manager	803-295-2598;	email and
	Working Forest Fund	tcutsinger@conservationfund.org	phone
Sally Manikian	VT/NH Rep TCF	603-233-2980	in person
		smanikian@conservationfund.org	
Bethany Olmstead	Conservation Manager,	(919) 951-0120	in person
	Working Forest Fund	bolmstead@conservationfund.org	

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Tom Wodetzki	Albion River Watershed Protection Association, Redwood Coast Watershed Alliance, the Sierra Club and Mendocino Land Trust.	31901 Middle Ridge Road, Albion CA 95410; 707- 937-1113; tw@mcn.org	email	Yes
Jasen Stoc	New Hampshire Timberland Owners Association and NH SFI SIC	jstock@nhtoa.org; 802-224-9699	email and phone	No
William Staats	New Hampshire Fish and Game Department	11 Hazen Drive, Concord, NH 03301- 6500; 603-271-3421	letter	No
Brian Hurt	Wylatti Resource Management Inc.	707-489-1463	phone	No
Chris Ramsey	California Department of Fish and Wildlife	Chris.Ramsey@wildlif e.ca.gov	email	No

Steve Agius	Silvio O. Conte National Fish and Wildlife Refuge	steve_agius@fws.gov	email	Yes
Darcie Mahoney	Forester (retired), former TCF contractor	707-877-3435; dmahoney@mcn.org	phone	No

Appendix 4 – Additional Evaluation Techniques Employed

X None.

Additional techniques employed (*describe*):

Appendix 5 – Certification Standard Conformance Table

C= *Conformance with Criterion or Indicator*

C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances NC= Nonconformance with Criterion or Indicator NA= Not Applicable

REQUIREMENT	C/NC	COMMENT/CAR
		As of the country in which they occur, and international natory, and comply with all FSC Principles and Criteria. North Coast Timberlands No violations, complaints or investigations have been received since the last annual audit.
administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <i>Certifying Body</i> (CB) during the annual audit.		Mendocino County has passed a new regulation related to the creation of standing dead trees on private property. The ordinance indicates a level of liability related to future fires and fuel availability. This could impact the application of herbicide using the hack-and- squirt method to tanoaks on the property, although it is not clear that this would constitute a violation. The FME has utilized this method to control tanoak as part of its ecological objectives to increase or maintain conifer stocking levels on the property. The California FPA Rules require that species composition related to Type A species is not decreased through management. Tanoak might be reduced by other more labor-intensive methods, but these are much more costly.

		Success Pond
		No violations, complaints or investigations have been received since the last annual audit.
1.1.b. To facilitate legal compliance, the	С	North Coast Timberlands
forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.		THPs are designed to facilitate legal compliance. Thus, operating in compliance with the THP ensures legal compliance. Violation would result in citation against THP from CalFIRE. All contractors are required by contract (samples reviewed by audit team) to operate in compliance with the specifications of the THP. All operators are licensed by the State of California. Standard pre-operation meeting between one of FME's two RPFs and each contractor is conducted to cover the specifics of the project, including reviewing applicable forestry laws and regulations.
		Success Pond
		All contractors are required by contract (samples reviewed by audit team) to operate in compliance with applicable state law. Standard pre-operation meeting with each contractor is conducted to cover the specifics of the project, including reviewing applicable forestry laws and regulations.
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	С	
1.2.a. The forest owner or manager	С	North Coast Timberlands and Success Pond
provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.		Document review and interviews with FME staff confirm that all required property taxes and yield taxes have been paid in a timely manner. The FME makes payments on time (quarterly) and has no outstanding payments due.
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	С	
1.3.a. Forest management plans and	С	North Coast Timberlands and Success Pond
operations comply with relevant provisions of all applicable binding international agreements.		No evidence of non-compliance with international requirements. The FME has a list of applicable treaties, the requirements of which are incorporated into federal law.
		The FME does not harvest nor sell any products covered under CITES, and labor conventions on the FMU comply

		with ILO Conventions. The management of the FMUs includes many projects with the objective of maintaining diversity of species and habitats in accordance with the Convention on Biological Diversity.
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	С	
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	С	North Coast Timberlands and Success Pond No areas of conflicts with compliance to the FSC P&C were found with laws or regulations pertaining to the forest or its management.
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	С	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).	C	North Coast Timberlands TCF provides protection from illegal and unauthorized activities on the forest by gating most access avenues and keeping the gates locked. They also hire a patrol person to look for illegal access and activities. Some activities, such as hiking, are allowed with a written permit. FMEA staff and contractors also provide security through their day-to-day activities on the FMUs. In addition, due to the pervasive nature of illegal marijuana plantations in the region, each year (approximately in June) the FME flies the properties to look for marijuana grows. GPS coordinates for any discovered marijuana grows are provided to the sheriff. Have not had severe water diversion or land clearance related to marijuana grows in recent years. Success Pond TCF provides protection from illegal and unauthorized activities on the forest by gating most access avenues and keeping the gates locked or by rock barriers. Local law enforcement is used if issues arise.
1.5.b. If illegal or unauthorized activities	С	North Coast Timberlands
occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration		The main types of illegal activities include unpermitted access and illegal marijuana growing. Unauthorized trespass is most often handled by requiring the people to fill out a permit for access. Illegal marijuana growing is handled by reporting and cooperating with the appropriate law

of available resources.		enforcement. Sheriff won't take enforcement on anything under 200 plants, but it will eradicate it sometime in the following summer. No instances of timber theft. If timber theft was discovered, then it would be referred to CalFIRE. Success Pond No such issues at this time.
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	C	
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	C	North Coast Timberlands and Success Pond Publically-available commitment can be found in management planning documents available on TCF's website. The following statement appears on TCF's website: "The Conservation Fund recognizes that forest certification is a critical component of objective, sustainable forest management and commits to third-party certification of its working forests. When ownership of our Working Forest Fund (WFF) properties is planned to exceed one year, we will seek independent certification under the standards of Sustainable Forestry Initiative® (SFI) and/or Forest Stewardship Council® (FSC)." <u>http://www.conservationfund.org/what-we-do/working-forest-fund/certification</u>
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL- 20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	C	North Coast Timberlands and Success Pond The FME does not certify all of its holdings. The Conservation Fund is a national organization, with land holdings throughout the United States. FME staff and written document explain why many of TCF's holdings are not certified. In most cases, the organization functions as a short-term owner before transferring the property to a government land management agency or non-profit entity in the form of a conservation easement. TCF's holdings outside of this certificate are in conformance with the partial estate rules (e.g., no conversion, no use of GMOs, etc.).
1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	С	 North Coast Timberlands and Success Pond No changes in ownership and/or changes in management planning for either parcel. Other FMUs The FME notified SCS of several change in of scope this year. The changes to the certificate are as follows: (1) remove the

parcel; (3) add 8,162-acre Cranberry Lake, NY parcel; (4) add 32,43-acre Reed Plantation, ME parcel; and (5) reduce the East Grand Lake, ME parcel to 4,543 acres and change the location to the Weston township. SCS has processed these changes, which are reflected in this audit report and on the FSC website and database.

P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.

C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	C	
2.1.a. The forest owner or manager provides clear evidence of <i>long-term</i> rights to use and manage the FMU for the purposes described in the management plan.	С	North Coast Timberlands Parcels are held in fee simple by TCF. Forest management activities allowed in conservation easement areas provide long-term rights to use and manage the FMU for the purposes described in the FMP. Success Pond
		Parcel is owned in fee by TCF. Titles are clear, and there are no restrictive easements or encumbrances that might interfere with management of the property. As explained in the FMP, the Success Pond parcel was purchased in 2012.
2.1.b. The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.	C	 North Coast Timberlands All deeds are held in the North Carolina office and in TCF's central office in Arlington, VA. Digital copies are available at the Caspar Office in CA. Reciprocal right-of-way agreements exists with some adjacent properties. Conservation easements held on Garcia and Gualala; the easements require management in order to facilitate long-term late seral growth and prohibits subdivision, essentially limiting land management forestry activities. TCF owns mineral rights. Success Pond Deeds are held in North Carolina office and in TCF's central office in Arlington, VA. Deed for Success Pond is filed in Coos County, NH.
2.1.c. Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing	С	North Coast Timberlands Excellent maps were available for field visits to both parcels. Property lines are clearly marked on the ground. At Site 23

management activities in the vicinity of the boundaries.		 (Olsen Gulch THP, flagged unit) auditors confirmed that trees along property boundary with neighboring Redwood Empire ownership are marked with 2-3 blazes and yellow paint near unit boundary. Success Pond Excellent maps were available for field visits. Boundaries are well marked on the ground and were inspected in several places.
C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.	С	
2.2.a. The forest owner or manager allows the exercise of <i>tenure</i> and <i>use rights</i> allowable by law or regulation.	С	North Coast Timberlands Although they are not legal use rights, TCF allows
		recreational access and collecting on their forests by permit. Success Pond
		Longstanding, 5-party crossing rights to access nearby parcels of forest land. Snowmobile trail is a permanent easement access right, while ATVs only have annual access rights. Camps on pond are owned in fee, with deeded access.
2.2.b. In FMUs where tenure or use rights	С	North Coast Timberlands
held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities		The FME actively consults with TNC as easement holder. TNC monitors the conservation easements.
do not significantly impact the uses or		Success Pond Consultation is done where needed, e.g., annual lease
benefits of such rights.		agreements are negotiated with camp owners, ATV groups, snowmobile organizations, etc. TCF carries liability insurance on camps on leased lands
C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	C	

2.3.a. If <i>disputes</i> arise regarding tenure	С	North Coast Timberlands and Success Pond
claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes. 2.3.b. The forest owner or manager	C	No disputes have arisen over tenure rights. FME staff explain that if a dispute were to arise, the organization would make a good-faith effort to resolve the issue outside of court through open communication, negotiation, and/or mediation.
documents any significant disputes over tenure and use rights.		Records of disputes are kept on file along with an explanation of the course of action that was implemented to address the issue. Issues have been minor and not over tenure or use rights.
P3 The legal and customary rights of indigence resources shall be recognized and respected.		es to own, use and manage their lands, territories, and
C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	NA	TCF property does not include any lands owned or claimed by Native Americans, so this criterion and associated indicators is not applicable.
3.1.a. Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.	-	
3.1.b. The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.	-	
C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	С	
3.2.a. During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	North Coast Timberlands A list of Mendocino County Native American contacts is maintained and updated regularly by CalFIRE. As part of the state-required THP process for private lands forest management, the FME utilizes the agency's database to identity tribal representatives to which letters requesting input on planned activities are mailed in order to confirm that no harm will come to their resources or rights.

		Success Pond
		The "Multiple Resource Management Plan" for Success Pond Tract identifies four communities of indigenous people in the Success Pond area. TCF has conducted outreach to two of the communities of indigenous people. The auditors believe that there is an opportunity to improve outreach to other locally-recognized indigenous groups referenced in the FMP (see OBS 2017.6).
3.2.b. Demonstrable actions are taken so	С	North Coast Timberlands
that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.		Most rights of Native Americans related to protection of archaeological sites. Per California Forest Practice Rules, these sites must be protected and their protection must take input from tribes into account. Protection measures for tribal resources are incorporated into the THP prior to approval. Consultation with the appropriate tribal groups is required and the state archeologist reviews protection measures.
		Success Pond
		Tribal resources have not been identified on site, however, foresters are aware of the need to protect these resources if found.
C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
3.3.a. The forest owner or manager invites	С	North Coast Timberlands
consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.		Per comments in 3.2.a., consultation with tribal representatives is required as a part of the THP approval process. CalFIRE provides a search capability for significant cultural or historical sites, and this search is part of the process for planning of THP's.
		Success Pond
		Per comments in 3.2.a., consultation with tribal representatives is required as a part of the THP approval process. Letters have been sent to two local communities of indigenous people in the Success Pond area inviting consultation.
3.3.b. In consultation with tribal	С	North Coast Timberlands
representatives, the forest owner or manager develops measures to protect or		Per comments in 3.2.b., most rights of Native Americans relate to protection of archaeological sites, and these sites

enhance areas of special significance (see also Criterion 9.1).		must be protected based on input from tribes. Protection measures for tribal resources are incorporated into the THP prior to approval. Consultation with the appropriate tribal groups is required and the state archeologist reviews protection measures. Success Pond No response has been received from the two local communities of indigenous people in the Success Pond area. If areas of special significance are found, they will be protected, per interview with area forester.
C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NA	Forest management activities on TCF properties does not use traditional knowledge of indigenous peoples, so this criterion and associated indicators is not applicable.
3.4.a. The forest owner or manager identifies whether <i>traditional knowledge</i> in forest management is being used.	-	
3.4.b When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.	-	
3.4.c. The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.	-	
P4 Forest management operations shall mair forest workers and local communities.	ntain or e	nhance the long-term social and economic well-being of
C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	С	
4.1.a. Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry.	с	North Coast Timberlands and Success Pond Compensation packages, including salary levels and benefits packages, for TCF field employees is competitive with local forest industry and non-profit organization norms.
4.1.b. Forest work is offered in ways that create high quality job opportunities for	с	North Coast Timberlands and Success Pond Interviews with FME staff confirmed that employees enjoy

employees.		their jobs and believe that the culture of the organization is healthy. There are opportunities for professional development and growth within the organization. Interviews with loggers and other contracted forest workers confirmed that the FME pays at competitive rates and the field staff are good to work with—they are communicative, responsive, and flexible. In addition, contractors say they appreciate that TCF pays them in a timely manner.
4.1.c. Forest workers are provided with fair wages.	С	North Coast Timberlands and Success Pond As described in 4.1.a. and 4.1.b., wages for both the FME's employees and its contractors are paid competitive wages.
4.1.d. Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.	С	North Coast Timberlands and Success Pond TCF is an equal opportunity employer, and all the required labor postings are posted in a prominent place in the Casper, CA office and regional office for the Working Forest Fund Success Pond tract in Gorham, NH. In 2014, TCF received an award from Minorities and Success for their human resource practices.
4.1.e. The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.	C	North Coast Timberlands and Success Pond Local contractors and suppliers are utilized whenever there are qualified local contractors and suppliers available. This includes everything from loggers and to coffee for the office. The fact that TCF hires locally contributes to why local communities support the organization and its atypical "conservation forestry" practices, especially when there are limited in-woods job opportunities.
4.1.f. Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.	C	 North Coast Timberlands TCF conducts tours of their properties and logging operations on a regular basis throughout the year. They send out e-mail invitations to various members of the local community and are open to inviting people on the tour who contact them with an interest in their operations. TCF has an advisory committee for the North Coast Program. The advisory committee, which functions as a way to seek local input and involvement, are provided an opportunity for participation in a field trip to review all planned timber harvests. TCF has identified social elements as integral to the program, and as such, the local TCF staff considers how they can enhance the beneficial social impacts of having TCF in the region. Examples of TCF's involvement in the local community include: (1) supporting creative arts, e.g.,

		College of the Redwoods and Mendocino Art Center photography and painting workshops, elementary school writing and art projects, etc.; (2) promoting recreation, e.g., interpretive walks, passive recreational access, Boy Scouts and Sierra Club hikes, Audubon trips, etc.; and (3) supporting science education and research, e.g., EMAP project, UC Davis research, Humboldt State University and other surveys, SONAR projects, PWA workshops, stakeholder tours. Success Pond
		TCF supports learning opportunities to improve public understanding of forests and forest management on their properties, including Success Pond.
4.1.g. The forest owner or manager	С	North Coast Timberlands and Success Pond
participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.		TCF donates to causes in the local community. Additionally, TCF has an annual firewood cutting program in which the public is allowed to collect free firewood from the property. This is a valuable community service given than many people locally use wood-powered stoves to heat their homes.
		TCF are members of the local community as are their contractors and participate in local development and activities. A good example is their current participation in the Educational Tall Ship program and the donation of logs to support the construction of the ship.
C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	С	
4.2.a. The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	North Coast Timberlands and Success Pond TCF has a <i>Commitment to Safety and Health</i> document that details their approach to maintaining a safe working environment. Specific company safety policies include: (1) frequent tailgate safety meetings—at least a half hour per month of safety training; (2) wearing personal protective equipment, including on all active harvest sites; (3) reporting all injuries, near-accidents, and hazardous conditions; and (4) holding employees accountable for poor safety performance by re-training and taking disciplinary action. Based on observations and interviews with FME staff and
		contractors, TCF appears to meet all applicable laws and regulations covering the health and safety of employees and

		their families. This is also true for contractors hired by TCF. All appropriate documents related to health and safety and worker's rights are prominently displayed in the Caspar, CA and Gorham, NH offices.
4.2.b. The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	с	 North Coast Timberlands and Success Pond Based on field observations, TCF's employees and contractors demonstrate a safe work environment. Appropriate PPE was utilized by employees and provided to the audit team, logging crews were seen wearing appropriate PPE on active sites, and FME staff were cognizant of the need to wear seat belts and drive safely. Interviews with contractors and review of FME documents indicates that both the FME and its contracted workers have a good safety track record. Contracts require that the contractors provide all the required PPE for the forest work being done. Minimal expectations are listed, but the contract specifies that the specific safety requirements be met by the contractors.
4.2.c. The forest owner or manager hires well-qualified service providers to safely implement the management plan.	c	North Coast TimberlandsBased on interviews with FME staff and observations of in- woods work, the service providers contracted by the FME are well-qualified. For example, all logging in CA is carried out by a CA LTO, herbicide contractors are licensed PCAs in CA, and the botanical surveys are carried out by trained botanists. When pesticide application is handled by TCF staff, a forester who is certified as QAL is utilized. Interviews with contracts confirm that they are knowledgeable of safety requirements. As discussed in 4.2.a., service providers safely implement the FMP.Success Pond Loggers confirmed to be trained, foresters maintain SAF certified forester certification and/or State license.
C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).	С	
4.3.a. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.	с	North Coast Timberlands and Success Pond Based on interviews with TCF employees and contractors, the FME respects the rights of workers. These rights are also protected by state and federal law. While they are free to organize as labor unions, neither employees or contractors

		have decided to do so.
4.3.b. The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.	C	North Coast Timberlands and Success Pond The employee manual for TCF includes culturally-sensitive mechanisms for resolving disputes. The manual was updated in 2016.
C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.	C	
 4.4.a. The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: Archeological sites and sites of cultural, historical and community significance (on and off the FMU; Public resources, including air, water and food (hunting, fishing, collecting); Aesthetics; Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; Community economic opportunities; Other people who may be affected by management operations. A summary is available to the CB. 	С	North Coast Timberlands TCF is highly aware of and considers carefully the potential social impacts of its management impacts on the resources and local community. The FME has a local advisory committee actively engaged in planning and review of planned activities. The FME annually publishes and makes available to the public an annual report about the North Coast Forest Conservation Initiative. The latest edition from 2016 was reviewed during the audit. Included in this is the Caspar Index, which includes a number of environmental, economic, and social metrics. North Coast Timberlands and Success Pond TCF maintains a list of stakeholders in the community that they use to invite people to their tours and for other consultation purposes. They have actively sought out the engagement of community members who may be affected by their forest management activities and those who have an interest in their forest management activities.
4.4.b. The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.	С	North Coast Timberlands As described in 4.4.a, TCF takes effort to seek and considers the input from people who would most likely be affected by management activities. The THP review process in CA includes a mandatory contact of adjacent landowners and downstream landowners. Public access to the SYP and each THP is provided by CalFIRE. Public notices of activities such as herbicide use are posted at least 30 days prior to planned activities and are filed with the county agriculture commissioner.

		Success Pond
		TCF considers input in management planning from local people when it undertakes forest management planning.
4.4.c. People who are subject to direct	С	North Coast Timberlands
adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.		Following the California Forest Practice Act Rules, each proposed THP is announced to all relevant parties with a request for input. Relevant parties include neighbors, tribes, and other members of the local community prior to cutting. This announcement is critical to the stakeholder consultation process for THPs.
		Success Pond
		TCF notifies adjacent landowners when needed, confirmed per interview.
4.4.d. For <i>public forests,</i> consultation shall	NA	North Coast Timberlands and Success Pond
 include the following components: Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public. 		TCF is not a public forest, so this criterion and associated indicators is not applicable.
C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.	С	
4.5.a. The forest owner or manager does	С	North Coast Timberlands and Success Pond
not engage in negligent activities that cause damage to other people.		Interviews with staff and contractors and review of dispute records confirms TCF's diligence and attention to safe and

4.5.b. The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.	C	environmentally-appropriate timber harvesting activities in order to prevent instances of negligence and damage to other people. North Coast Timberlands and Success Pond TCF staff maintain a log of their communications and stakeholder outreach efforts, as well as any grievances or complaints. The FME provides contact information on its website for anyone who is interested in voicing grievances or disputes. TCF maintains a log of all such grievances or disputes and the resolution of those. Disputes examined by auditors verified that the issues were minor and resolved relatively quickly without having to provide compensation to the complainant.	
4.5.c. Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.	С	North Coast Timberlands and Success Pond No cases of substantiated damage or loss of income caused by TCF were discovered during the course of the 2017 audit.	
P5 Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.			
C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	С		
5.1.a. The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.	С	North Coast Timberlands and Success Pond Observations of site conditions and conversations with FME staff and in-woods contractors demonstrate that TCF has funding necessary to carry out its core management objectives. All signs point to a financially healthy, well- funded organization that is able to maintain investments in conservation and restoration activities. For example, TCF has implemented many habitat improvement projects beyond the normal scope of certification as well as road upgrades to reduce the overall impact of the road systems on stream habitat and fisheries.	

		The WFF has significant assets for acquisition, and revenue from investments and management can be used to support forest management activities.
5.1.b. Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	С	North Coast Timberlands and Success Pond Resources are available for any short-term needs to conform to the Standard.
C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	С	
5.2.a. Where forest products are harvested	С	North Coast Timberlands
or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.		All recent sales have gone to local California-based logging contractors and log buyers. Much of the material harvested goes to the Mendocino Forest Products sawmill in Ukiah, CA and other local mills. Little opportunity exists for markets other than the traditional log and chip markets.
		Success Pond
		Harvest operations on Success Pond are conducted by local logging companies. Products—pulp logs, chips, and sawlogs—are sold to local processing facilities.
5.2.b. The forest owner or manager takes	C	North Coast Timberlands
measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.		Utilization standards are very high and strictly enforced under contract language. Little opportunity exists for product diversification at this time, although TCF has explored alternate uses of forest products, such as the pole market.
		Success Pond
		TCF contracts with LandVest Inc. for management the parcel. LandVest has a separate timber marketing company that pools products from multiple ownerships, creating efficiencies in product diversification and cost.
5.2.c. On public lands where forest	NA	North Coast Timberlands and Success Pond
products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.		TCF is not a public forest, so this indicator is not applicable.
C5.3. Forest management should minimize waste associated with harvesting and on- site processing operations and avoid damage to other forest resources.	С	
5.3.a. Management practices are	С	North Coast Timberlands and Success Pond
	1	

employed to minimize the loss and/or		Harvested units inspected during the audit showed good
waste of harvested forest products.		utilization of merchantable material.
5.3.b. Harvest practices are managed to protect residual trees and other forest resources, including: soil compaction, <i>rutting</i> and erosion are minimized; residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; damage to NTFPs is minimized during management activities; and techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.	С	 North Coast Timberlands Overall, site visits demonstrated that TCF foresters and contractors take great care to protect residual trees and other forest resources when harvesting. However, residual damage was observed by auditors in at Site 11 in the Ironing Board THP in the Big River Forest. The damage was greatest along a cable-yarding corridor. Staff explained that this resulted from insufficient deflection to keep the logs off of the ground by the logging contractor. Bark damage was significant to the extent that the health and growth of damaged trees was noticeably affected. See OBS 2017.1. Success Pond LandVest foresters, and especially the forester who manages the properties inspected, are known for practices that protect the forest, soil, and water. They routinely to select operators who can carry out operations in a careful manner. Inspections during the audit confirmed the
C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	С	protection of residual trees, soils, and water.
5.4.a. The forest owner or manager demonstrates knowledge of their operation's effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.	C	North Coast Timberlands TCF staff are close to the local communities and aware of the organization's impact on the local economy. This is central to the land conservation work that TCF does in the region. TCF is clearly focused on supporting and contributing to the local economy through its hiring of local contractors and supplying local mills and markets. As part of their annual review, TCF calculates their estimated local economic impact (taxes, wages, contractors, local suppliers, etc.). The North Coast Forest Conservation Initiative annual report includes the Caspar Index, which is a measure of the cultural, environmental, economic, and social activities of TCF locally. Interviews with 7 employees and/or contractors support TCF commitment to supporting a strong local economy. Success Pond Confirmed per interview with local forester.

5.4.b The forest owner or manager strives	С	North Coast Timberlands
to diversify the economic use of the forest		TCF has actively pursued alternate revenue streams on the
according to Indicator 5.4.a.		forest, including most notably forest carbon.
		Success Pond
		In addition to the harvest of forest products, TCF works in close cooperation with snowmobile and ATV clubs who use trails on its property. This region is a mecca for motorized outdoor recreation, and this is an essential element of the local economy.
C5.5. Forest management operations shall	С	
recognize, maintain, and, where		
appropriate, enhance the value of forest services and resources such as watersheds		
and fisheries.		
5.5.a. In developing and implementing	С	North Coast Timberlands
activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.		TCF implements measures to maintain and/or enhance forest services that serve public values, including fisheries, recreation, and climate change mitigation through carbon sequestration. The properties are certified under the Climate Action Reserve for carbon sequestration. A few years ago, the FME obtained a grant from the Bechtel Foundation to help cover the cost of upgrading stream crossings that were not up to the current 100-year storm standard and which were not scheduled for upgrading in the near future as part of a THP; TCF covered the additional funding required to accomplish the needed work. Not long ago, a major large woody debris placement stream habitat improvement project was implemented on the North Fork of the Garcia River in cooperation with The Nature Conservancy and California Department of Fish and Wildlife.
		Success Pond
		The conservation ethos that drives the work of TCF is clearly linked to protection and enhancement of the resources that serve public values. The management plan for Success Pond discusses the social and economic impacts of TCF ownership and management. Site visits in 2017 confirm that on-the- ground management reflect this commitment.
5.5.b The forest owner or manager uses the	С	North Coast Timberlands and Success Pond
information from Indicator 5.5.a to implement appropriate measures for		See discussion in 5.5.a.
maintaining and/or enhancing these		
services and resources.		
	1	

C5.6. The rate of harvest of forest products	С	
shall not exceed levels which can be		
permanently sustained.		
5.6.a. In FMUs where products are being	С	North Coast Timberlands
harvested, the landowner or manager		TCF utilizes inventory data to model sustainable growth
calculates the sustained yield harvest level		levels into the future. The Option A document approved by
for each sustained yield planning unit, and		CalFIRE includes the sustainability calculations for Garcia
provides clear rationale for determining the		River, Gualala, Big River, and Salmon Creek. Option A under
size and layout of the planning unit. The		California Forest Practice Rules requires accurate inventory
sustained yield harvest level calculation is		data and growth and harvest projection over the next 100-
documented in the Management Plan.		year planning period. This information is produced by a
		growth and yield model with inventory and management
		inputs and is reviewed by CalFIRE as part of the approval
The sustained yield harvest level calculation		process. The annual harvests from the four parcels on the
for each planning unit is based on:		North Coast are below the AAC calculated in the Option A
documented growth rates for particular		document.
sites, and/or acreage of forest types, age-		
classes and species distributions;		TCF maintains a through inventory system with permanent
mortality and decay and other factors that		plots, driven in part by its need to calculate carbon storage.
affect net growth;		A standard inventory is completed, and then growth is
		projected using CRYPTOS (the standard software for
areas reserved from harvest or subject to		projecting conifer growth in the redwood region). Growth
harvest restrictions to meet other		and yield projections rely on the established site classes for
management goals;		the forest area. Areas excluded from harvesting are not
silvicultural practices that will be employed		included in the calculation.
on the FMU;		Success Pond
management objectives and desired future		Recent inventories have been used to conduct growth
conditions.		simulations. Growth is estimated as 0.33 cords per acre, and
The calculation is made by considering the		an allowable cut is calculated to be 2,600-3,000 cords per
effects of repeated prescribed harvests on		year. Each property has a 10-year harvest schedule that is
the product/species and its ecosystem, as		consistent with the AAC and with objectives of the plan and
well as planned management treatments		appropriate silvicultural practices. TCF seeks to move
and projections of subsequent regrowth		forests on the parcel toward older age classes and improved
beyond single rotation and multiple re-		quality of large trees. As such, most harvests are designed
entries.		to improve stand conditions.
5.6.b. Average annual harvest levels, over	С	North Coast Timberlands
rolling periods of no more than 10 years,		Harvest levels provided to the audit team and published in
do not exceed the calculated sustained		the annual report are far below the AAC calculated in the
yield harvest level.		approved Option A document.
		Looking at harvest levels over time, it is clear that the
		harvest volumes in 2009-2011 were relatively low. This was
		due to the poor wood product markets during the Great
		Recession, allowing the forests to build up stocking and now

		support higher harvest levels. More recently, harvest levels have remained under AAC. Success Pond Calculated AAC is 2.2% of standing stock. Although there is a 10-year cutting plan in the management plan, TCF has only owned the parcel for a few years, and harvest by recent owners was conservative, thus the property is well stocked. Each year, the AAC is reviewed in light of operational needs.	
5.6.c. Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	C	North Coast Timberlands Previous owners of the TCF properties typically overharvested as part of intensive industrial forest management practices. TCF's light touch and low harvest levels are designed to increase standing stocks and accelerate the transition to a late seral forest. Using a combination of single tree selection and group selection, the restoration of depleted or overstocked stands is addressed. Examples of these stand treatments were observed during site visits and while touring the properties. Success Pond The forest management plan emphasizes the importance of employing harvest strategies to address the desires of TCF to improve value of the standing timber, both financially and ecologically.	
5.6.d. For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	C	North Coast Timberlands Other than forest carbon, there is no commercial enterprise for NTFPs on the property. As described in 4.1.g., firewood is provided to the local community for free. Success Pond There are no commercial NTFPs.	
P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.			
C6.1. Assessments of environmental	С		

C6.1. Assessments of environmental	С
impacts shall be completed appropriate	
to the scale, intensity of forest	
management and the uniqueness of the	

	1	
affected resources and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on- site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations. 6.1.a. Using the results of <i>credible scientific</i> <i>analysis, best available information</i>	C	North Coast Timberlands Site level conditions are assessed as part of THP process,
(including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:		including forest community types, RTE species, soil resources, botanical resources, and other requirements in this indicator.
1) Forest community types and development, size class and/or successional		At a larger landscape level, the Integrated Resource Management Plans assesses these factors on the level of the individual tracts.
 stages, and associated natural disturbance regimes; 2) Rare, Threatened and Endangered (RTE) species and rare ecological communities (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) Soil resources; and 6) Historic conditions on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions. 		Success Pond Environmental impact analyses meeting these requirements are contained as part of the forest management plan.
6.1.b. Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.	C	North Coast Timberlands The state-required THP process requires assessment and extensive documentation of the short and long-term impacts to RTE species and rare ecological communities, other habitats and species of concern, and soil and water resources, among other values.
The assessment must incorporate the <i>best</i> <i>available information</i> , drawing from scientific literature and experts. The impact assessment will at minimum include		 THPs reviewed for Olsen Gulch (Big River Forest) and Ironing Board (Big River Forest). Success Pond The FME is in compliance with this indicator.

identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.		
6.1.c. Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long- term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.	С	North Coast Timberlands and Success Pond Review of THP documentation and observing on-the-ground management activities showed numerous examples of management approaches designed to reduce negative impacts, including using low impact logging techniques, altering harvest plans to accommodate RTE and other species of concern, use of streamside management zones, and the focus on uneven aged management.
6.1.d. On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.	NA	North Coast Timberlands and Success Pond TCF is not a public forest so this indicator is not applicable.
C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	С	
6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with	C	North Coast Timberlands State natural heritage database is reviewed as part of the THP process, and listed species are assumed to be present. Prior to the commencement of any planned site disturbing activity surveys are conducted to determine the presence of any RTE species. Botanical surveys are conducted by trained local botanist working as contractors. Northern spotted owl (NSO) surveys are conducted prior to commencement of site disturbing activities by trained survey crews.

the appropriate expertise in the species of		Success Pond
interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.		TCF recently hired a field ecologist to conduct detailed biological surveys. These surveys have been useful to TCF in identifying rare species and communities that enhance justifications for cooperative funds to purchase properties in the region. The information also is used to protect habitats for and locations of RTE elements. These surveys are used in conjunction with natural heritage data from the State of
		New Hampshire, as well as other conservation plans such as State Wildlife Action Plans.
6.2.b. When RTE species are present or	С	North Coast Timberlands
assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. <i>Conservation zones</i> and/or <i>protected areas</i> are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long- term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary		Several examples of modifications in management to protect or enhance RTE species were observed during the course of the field audit. These included NSO protection, fisheries habitat enhancement projects, road improvement projects, HCV management and monitoring, and species composition management.
		One RTE species requiring the attention is the northern spotted owl. Based on the results of NSO surveys described in 6.2.a. discovered nesting sites and activity centers are mapped and protected spatially and temporally. NSO activity centers were observed on maps, and one such area was verified on the ground in the Big River Forest (see notes for Site 11).
to achieve the conservation goal of the Indicator.		Field visits confirmed protection for other detected RTE species during timber harvesting, such salmonid streamside buffer protection measures mandated by the California FPA Rules.
		Success Pond
		Several examples of modifications in management to protect or enhance RTE species were observed during the course of the field audit. These included road improvement projects, HCV management and monitoring, and harvest boundary adjustments. Field visits confirmed protection for other detected or nearby RTE species during timber harvesting, such as aquatic streamside buffer protection measures.
6.2.c. For medium and large public forests	NA	North Coast Timberlands and Success Pond
(e.g. state forests), forest management plans and operations are designed to meet		TCF is not a public forest so this indicator is not applicable.
species' recovery goals, as well as		
landscape level biodiversity conservation		

goals.		
6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	 North Coast Timberlands Public access to and use of the TCF properties is limited to hiking by permit only and occasionally woodcutting. The FME has one dedicated patrol staff to provide security on the forest. CA Department of Fish & Wildlife is the regulatory agency charged with control of wildlife and plant species to avoid the risk to vulnerable species and communities, and TCF works closely with the agency to achieve this goal. Success Pond The most convenient access point to Success Pond is controlled with a private gate (TCF employees have keys). Other access points are not controlled. State and local law enforcement personnel can be expected to respond to any calls related to illegal activities that threaten people on the forest or RTE species.
C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	С	
6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	North Coast Timberlands One of the goals of TCF's management is to accelerate a late seral successional stage, which is underrepresented on the landscape. This is accomplished through their focus on selection silviculture. In order to create late seral stages, a number of areas on the properties have restrictions on harvests, including in the Ecological Reserve on the Garcia River parcel with a conservation easement held by TNC. Upper diameter limits for harvest are in place, too. Current cut restrictions are no- cuts on redwood over 48 inches, Douglas-fir over 38 inches, and old growth. Other forest communities that receive special considerations include oak trees, red alder trees, grasslands and riparian communities, among others.
		Success Pond The management plan emphasizes the importance of the surrounding landscape in setting goals. The parcel is in a

		matrix of lands with a long history of active forest harvesting; TCF's goal is to enhance the abundance and quality of older-aged stands.
6.3.a.2. When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <i>conservation zones</i> and/or <i>protected areas</i> are established where warranted.	C	North Coast Timberlands The properties include numerous examples of rare ecological community management to maintain, restore, or enhance the viability of forest communities. Among others, these include oak retention, red alder retention, grasslands, ecological reserves, riparian buffers along fish and non-fish bearing streams (buffers in the ecological reserve are larger than required by state regulation or FSC), road improvements to reduce impacts, stream restoration to provide additional spawning areas, in-stream large woody debris installments, and NSO habitat protections. Rare ecological communities identified on the forest have typically been categorized as HCVFs (pygmy forest, oak woodlands, etc.). These areas are not managed except as needed to maintain the HCV values. Success Pond Natural resource inventory report has been conducted for Success Pond, including identifying and protecting significant natural communities, primarily wetlands. Many acres of quality wetlands and riparian zones are found on the property; these areas are described in the management plans and are protected on the ground. TCF retains wider buffers in riparian zones than required by the State of New Hampshire.
6.3.a.3. When they are present,	NA	North Coast Timberlands
management maintains the area, structure, composition, and processes of all <i>Type 1</i> and <i>Type 2 old growth</i> . Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.		No type 1 or type 2 old growth stands are present on the forest. Individual scattered old growth trees are not harvested. TCF has a no-cut policy on all old growth stands and trees on the North Coast properties. Success Pond There are no old growth stands on the property, as confirmed in interviews with staff and contractors and a review of inventory information.
Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old		

growth attributes (e.g., remove exotic	
species, conduct controlled burning, and	
thinning from below in dry forest types	
when and where restoration is	
appropriate).	
Type 2 Old Growth is protected from	
harvesting to the extent necessary to	
maintain the area, structures, and	
functions of the stand. Timber harvest in	
Type 2 old growth must maintain old	
growth structures, functions, and	
components including individual trees that	
function as refugia (see Indicator 6.3.g).	
On public lands, old growth is protected	
On public lands, old growth is protected	
from harvesting, as well as from other	
timber management activities, except if	
needed to maintain the values associated	
with the stand (e.g., remove exotic species,	
conduct controlled burning, and thinning	
from below in forest types when and where	
restoration is appropriate).	
On American Indian lands, timber harvest	
may be permitted in Type 1 and Type 2 old	
growth in recognition of their sovereignty	
and unique ownership. Timber harvest is	
permitted in situations where:	
Old growth forests comprise a significant	
portion of the tribal ownership.	
A history of forest stewardship by the tribe	
exists.	
High Conservation Value Forest attributes	
High Conservation Value Forest attributes	
are maintained.	
Old-growth structures are maintained.	
Conservation zones representative of old	
growth stands are established.	
Landscape level considerations are	
addressed.	
Rare species are protected.	

6.3.b. To the extent feasible within the size	С	North Coast Timberlands
of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.		TCF's management focus is aimed at restoring habitat conditions associated with late seral species, and their efforts to maintain, enhance, and restore such habitat conditions is exemplary. Success Pond Although the parcel is too small to contribute substantially to landscape-levels goals for habitat, the property was purchased by TCF as part of a larger effort to establish appropriate ownership, protection, and management of an entire landscape.
6.3.c. Management maintains, enhances	С	North Coast Timberlands
and/or restores the plant and wildlife habitat of <i>Riparian Management Zones</i> (<i>RMZs</i>) to provide: habitat for aquatic species that breed in		TCF actively manages riparian areas to enhance habitat features. Examples include active placement of large woody debris in streams in order to increase diversity in stream flow.
surrounding uplands; habitat for predominantly terrestrial species that breed in adjacent <i>aquatic</i> <i>habitats</i> ; habitat for species that use riparian areas for feeding, cover, and travel; habitat for plant species associated with riparian areas; and, stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.		Several examples of projects to maintain, enhance and/or restore the riparian vegetation and the fish and wildlife habitat of riparian areas were reviewed during the field audit. Examples visited included buffers and maintenance of canopy cover on streams, large woody-debris installment, new road construction uphill of riparian areas (unlike historic road system), bridge rebuilding and installation of redwood cross-weirs and alder log sprouts, and Ecological Reserve Network protections for riparian areas. Success Pond Riparian zones are in place surrounding wetland areas in Success Pond (note the "pond" itself is within the property but not owned by TCF). Site visits confirmed presence of RMZs at multiple locations. Buffers were respected on RMZs with boundaries flagged and/or painted prior to harvesting.
Stand-scale Indicators	С	North Coast Timberlands
6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.		TCF's management goals include maintaining and enhancing the natural distribution of plant species. Uneven-aged management is consistent with the natural disturbance regimes for the coastal redwood region as described in TCF's forest management plan. Tanoak is controlled only as much as necessary to reestablish conifer dominance on sites that were historically conifer-dominated.
		Success Pond
		Management goals detailed in management plans include maintaining the natural distribution of plant species on the

		site. Field sites visited demonstrate that these goals are being met.
6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. <i>Native species</i> suited to the site are normally selected for regeneration.	С	North Coast Timberlands Limited amount of planting is done when natural regeneration is insufficient. Planting stock is from appropriate local seed zones. Success Pond Planting is not done; all regeneration is natural as observed in the field.
 6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, <i>snags</i>, and well-distributed coarse down and dead woody material. <i>Legacy trees</i> where present are not harvested; and b) vertical and horizontal complexity. Trees selected for <i>retention</i> are generally representative of the dominant species found on the site. 	C	 North Coast Timberlands The use of single-tree selection and group selection on no more than 20% of the area provides habitat components and stand structures that could be expected from naturally-occurring processes. Large live trees, legacy trees, and snags are maintained across the landscape. These are generally marked with a "W" in the field to provide retention during harvest. Structural diversity is maintained by retaining trees with wildlife habitat features, such as large limbed trees. Legacy trees, as defined by the FSC, are not harvested. Success Pond Large live trees, legacy trees, and snags are maintained across the landscape. These are generally marked with a "W" in the field to provide retention during trees, as defined by the FSC, are not harvested.
 6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when <i>even-aged</i> <i>systems</i> are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region. In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are	NA	North Coast Timberlands Even-aged management is limited to 1-acre group selection cuts in planted areas in existence when the property was acquired by TCF. Currently, the age of these requires pre- commercial thinning as the management technique. Even-aged methods such as clearcutting, seed tree removal, and shelterwood removal are not modeled for the approved Option A. However, these eve-aged systems may be used in the event of severe damage resulting from natural causes such as fire or wind to capture mortality and regenerate the site.

employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.		Success Pond The management plan emphasizes the importance of retention in even-aged silviculture. Only small areas were observed to be even-aged management. Success Pond primarily uses uneven aged management.
 6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan: 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the <i>best available information</i> including peerreviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 	NA	North Coast Timberlands and Success Pond TCF is not pursuing this option for any of its FSC-certified FMUs.
 6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <i>invasive species</i>, including: a method to determine the extent of invasive species and the degree of threat to 	C	North Coast Timberlands TCF has an invasive species management plan that includes detection, control and monitoring. Invasive species management is done primarily through herbicide use, focused on areas where invasives can be contained. The main invasives targeted are Jubata grass, French broom, bull thistle, and Italian thistle. On the Salmon Creek Forest, no

native species and ecosystems;		herbicides are utilized.
implementation of management practices		Success Pond
that minimize the risk of invasive		A management goal for the parcel is to combat invasive
establishment, growth, and spread;		species. Fortunately, only a few instances of invasive plants
eradication or control of established		have been documented on or near the ownership.
invasive populations when feasible: and,		
monitoring of control measures and		
management practices to assess their		
effectiveness in preventing or controlling		
invasive species.		
6.3.i. In applicable situations, the forest	с	North Coast Timberlands
owner or manager identifies and applies	C	
site-specific fuels management practices,		Fuels management practices are generally limited to
based on: (1) natural fire regimes, (2) risk of		treatment of slash following logging. Wildfires are
wildfire, (3) potential economic losses, (4)		uncommon in the redwood belt of Northern California because of the wet conditions, although they do occur
public safety, and (5) applicable laws and		occasionally, especially during extreme drought periods.
regulations.		
		As explained in discussion of 1.1.a., Mendocino County has
		passed a new regulation related to the creation of standing
		dead trees on private property. The ordinance indicates a
		level of liability related to future fires and fuel availability.
		This could impact the application of herbicide using the
		hack-and- squirt method to tanoaks on the property, although it is not clear that this would constitute a violation.
		Success Pond
		Fires are uncommon and fuel management is rarely
		addressed in northern New England.
C6.4. Representative samples of existing	С	
ecosystems within the landscape shall be		
protected in their natural state and		
recorded on maps, appropriate to the scale		
and intensity of operations and the		
uniqueness of the affected resources.		
6.4.a. The forest owner or manager	С	North Coast Timberlands
documents the ecosystems that would		The FME has developed most of its North Coast program on
naturally exist on the FMU, and assesses		the basis of regional ecologically-focused assessments and
the adequacy of their representation and		plans. Conservation Prospects for the North Coast: A
protection in the <i>landscape</i> (see Criterion		Review and Analysis of Existing Conservation Plans, Land
7.1). The assessment for medium and large		Use Trends and Strategies for Conservation on the North
forests include some or all of the following:		Coast of California, prepared by the FME in August 2005,
a) GAP analyses; b) collaboration with state		provides a collection and synthesis of conservation plans in
natural heritage programs and other public		the North Coast.
agencies; c) regional, landscape, and		Success Pond
watershed planning efforts; d)		

collaboration with universities and/or local conservation groups. For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.		Management planning has included the landscape context of the forest ecosystem, including communities that would naturally exist on the FMU.
 6.4.b. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes. Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU. 	C	North Coast Timberlands Based on 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 (see discussion in 6.4.a) and other work, the FME has concluded that because of the widespread protected nature of lands in the region, the regulatory system restricting land use change and harvest practices, and the existing pattern of habitat conditions and ecological processes present on the landscape, designating RSAs on their property is unnecessary and would not be ecologically beneficial (see policy document, The Conservation Fund North Coast Forest Conservation Program Policy Digest; July 2017 version). The FME further concludes that HCVFs on their properties protect the ecological values that RSAs supply. This decision was made in consultation with TCF's Advisory Council, which comprises outside stakeholders representing a diversity of local perspectives. Success Pond No RSA have been identified on the property.
 6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA 	NA	North Coast Timberlands and Success Pond No RSAs are designated, so this indicator is not applicable.

was designated.		
6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.	С	North Coast Timberlands In the North Coast Forest Conservation Program Policy Digest (see discussion in 6.4.b.), the FME commits to re- evaluating its decision on RSAs at least every 10 years, with stakeholder input, as part of planned updates to its management policies. The FME's forestry staff confirmed that no such re-evaluation of its RSA policy has been conducted since the August 2005 collection and synthesis of all of North Coast conservation plans, and thus the re- evaluation is overdue. See Minor CAR 2017.3 .
6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	NA	North Coast Timberlands and Success Pond TCF is not a public forest, so this indicator is not applicable.
C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	С	
6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	North Coast Timberlands TCF has written road management policies contained in its policy digest for the North Coast properties. Success Pond Noted in forest management plan.
6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	С	North Coast Timberlands Field inspections overall showed compliance with best management practices. Indeed, when during a site visit to Olsen Gulch THP (Site 22) with the auditors it was discovered that water bars had been installed incorrectly on several tractor trails, the FME immediately told the contracted crew leader that the water bars must be reconstructed to standard. This demonstrated a thorough knowledge of proper BMP installation by TCF staff and a commitment to ensuring that forest operations meet or exceed BMPs. Success Pond
		Field inspections overall showed compliance with best management practices.

6.5.c. Management activities including site	С	North Coast Timberlands
preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. Rutting and compaction is minimized. Soil erosion is not accelerated. Burning is only done when consistent with natural disturbance regimes. Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not		Field inspections showed overall compliance with this indicator. Slash was often lopped and scattered onsite to protect from soil erosion. No rutting or compaction was observed at field sites. Cable yarding is used on steeper slopes, which reduces soil impacts associated with logging. No prescribed fire is used. Success Pond Field inspections showed overall compliance with this indicator.
be harmed. Low impact equipment and technologies is used where appropriate.		
6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:	С	North Coast Timberlands On the whole, TCF's transportation network was in excellent shape. TCF works on minimizing road density, and closes unnecessary roads with the goal of making them "hyrdologically invisible," meaning that the fill is pulled up to make them impassable, crossings are removed, and tree planting is done. The organization is also making a strong push to locate new roads in upland areas rather than in sensitive riparian zones as previous owners had done. All roads are gated in order to control off-road vehicle use and damage to the road network.

access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; road density is minimized; erosion is minimized; sediment discharge to streams is minimized; there is free upstream and downstream passage for aquatic organisms; impacts of transportation systems on wildlife habitat and migration corridors are minimized; area converted to roads, landings and skid trails is minimized; habitat fragmentation is minimized; unneeded roads are closed and rehabilitated.		In evaluating compliance with this indicator, however, two problems were identified: 1. Two of three culverted crossings examined along Olsen Gulch Road in the Garcia River Forest had "bed load" sediment build-up behind the trash racks at the upstream inlets (see notes for Site 14). Additionally, staff acknowledged that trash racks had not been installed correctly. Water passage through the culverts was not significantly impeded; however, the build-up of material presents a potential source of sediment discharge into the streams and further contributes to the ability for the culvers to efficiently move water, particularly in high-volume storm events. See OBS 2017.2 . 2. At Sites 21 and 22, auditors noted that the roads appurtenant to the active harvest on the Olsen Gulch THP in the Garcia River Forest had a deep layer of fine, dusty silt powder that was being stirred up by trucks using the road. Water availability limited the extent of the road that could be watered each evening, but dust levels were at problematic levels. The Timberlands Manager for the FME was concerned enough to be exploring options with the LTO to remedy the problem. The California Practice Rules (version 2017) requires in that use and maintenance of logging roads occur in a manner that avoids or substantially lessens significant adverse impacts to water quality and the beneficial uses of water, soil resources, and air quality. Dust conditions on the Olsen Gulch THP roads being actively used by the LTO may be at risk of approaching these legal limits. See OBS 2017.4 . Success Pond
		Site visits confirmed that TCF's transportation network met the requirements in this indicator.
6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written <i>Streamside</i> <i>Management Zone</i> (SMZ) <i>buffer</i> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include	C	North Coast Timberlands The California FPA Rules include explicit requirements for designation and protection of SMZs, and TCF's internal requirements are generally even more restrictive. SMZ buffers are delineated and implemented through consultation with CalFIRE, fisheries biologists, and other experts as required. Field visits confirm implementation of proper SMZ buffers in harvested units. Success Pond SMZs were sufficient per site vists.

vegetative buffer widths and protection measures that are acceptable within those buffers. In the Appalachia, Ozark-Ouachita,		
Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.		
6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.	NA	North Coast Timberlands and Success Pond No variations have been requested for any of TCF's FMUs, so this indicator is not applicable.
6.5.f. Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of <i>aquatic</i> <i>habitat.</i> Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.	С	 North Coast Timberlands Stream crossings were inspected and found to be in overall compliance with BMPs. At Site 14, auditors identified "bed load" sediment build-up behind the trash racks at the upstream inlets for two culverts, and OBS 2017.2 has been issued under 6.5.d. Success Pond Stream crossings were inspected and found to be in overall compliance with BMPs.

6.5.g. Recreation use on the FMU is	С	North Coast Timberlands
managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.		Recreation is managed through a permit system. A dedicated patrol officer helps to enforce the limited recreation and ensure that recreation does not negatively impact soils, water, plants, wildlife and wildlife habitats. Success Pond The parcel generally open to recreation throughout the year, with restricted motorized access.
6.5.h. Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.	NA	North Coast Timberlands and Success Pond No domestic grazing occurs on any of TCF's properties, so this indicator is not applicable.
C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.	C	
6.6.a. No products on the FSC list of Highly Hazardous Pesticides are used (see FSC- POL-30-001 EN FSC Pesticides policy 2005 and associated documents).	C	North Coast Timberlands No highly hazardous chemicals as defined by FSC are used. Success Pond No chemicals are used.
 6.6.b. All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling 	C	North Coast Timberlands Herbicides are the primary method of control for invasive species and undesirable tanoak. Alternate methods have been investigated and used, such mechanical control, although these options are usually prohibitively expensive. TCF is committed to reducing pesticide use through a targeted approach that only focuses on individual tanoaks that would shade out competing conifers, not the broad

invasive and exotic species; or d) result in less environmental damage than non- chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.		scale application to all hardwoods that past managers of the land used. Justification of herbicide use and application is in <i>Herbicide</i> <i>Application and Hardwood Management Policy</i> . Success Pond No chemicals are used.
6.6.c. Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non- target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.	С	North Coast Timberlands No aerial spraying is used. Herbicide application is typically done through frilling – hand application where the chemical is inserted into the tree (i.e., hack and squirt method of application). Success Pond No chemicals are used.
 6.6.d. Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites. 	C	North Coast Timberlands Written prescriptions are prepared, including maps and hazard areas. Applications done by licensed state applicators. Success Pond No chemicals are used.
6.6.e. If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and	С	North Coast Timberlands Records are kept of pest occurrences and application of chemicals.

incidences of worker exposure to		Success Pond
chemicals.		No chemicals are used.
C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	С	
6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	C	North Coast Timberlands Contractors are required to carry spill kits and be trained in their use. Onsite inspections of active harvest sites and interviews with contractors confirmed that these requirements are met. Success Pond The FME requires contractors to carry spill kits and be trained in their use.
6.7.b. In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	С	North Coast Timberlands and Success Pond Spills are promptly contained when they occur. Spills above the reporting threshold are reported to the state regulators.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	С	North Coast Timberlands and Success Pond No evidence of hazardous materials or equipment near RMZs or sensitive areas. All RMZs include equipment exclusion zones as a standard protection measure.
C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	NA	North Coast Timberlands and Success Pond No biological control agents nor GMOs are used by the FME, so this criterion and associated indicators are not applicable.
6.8.a. Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i> , insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use	-	

is contingent upon peer-reviewed scientific		
evidence that the agents in question are		
non-invasive and are safe for native		
species.		
6.8.b. If biological control agents are used,	-	
they are applied by trained workers using		
proper equipment.		
6.8.c. If biological control agents are used,	-	
their use shall be documented, monitored		
and strictly controlled in accordance with		
state and national laws and internationally		
accepted scientific protocols. A written		
plan will be developed and implemented		
justifying such use, describing the risks,		
specifying the precautions workers will		
employ to avoid or minimize such risks, and		
describing how potential impacts will be		
monitored.		
6.8.d. Genetically Modified Organisms	-	
(GMOs) are not used for any purpose		
C6.9. The use of exotic species shall be	NA	North Coast Timberlands and Success Pond
carefully controlled and actively monitored		No exotic species are used by the FME, so this criterion and
to avoid adverse ecological impacts.		associated indicators are not applicable.
6.9.a. The use of <i>exotic species</i> is	-	
contingent on the availability of credible		
scientific data indicating that any such		
species is non-invasive and its application		
does not pose a risk to native biodiversity.		
6.9.b. If exotic species are used, their	-	
provenance and the location of their use		
are documented, and their ecological		
effects are actively monitored.		
6.9.c The forest owner or manager shall	-	
take timely action to curtail or significantly		
reduce any adverse impacts resulting from		
their use of exotic species		
C6.10. Forest conversion to plantations or	С	
non-forest land uses shall not occur, except		
in		
circumstances where conversion:		
a) Entails a very limited portion of the		
forest management unit; and b) Does not		
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occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit. 6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators	C	North Coast Timberlands and Success Pond No conversion of forest to non-forest use occurs by the FME. TCF's management goals are to preserving working forests as forests.
6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).		
 6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed). 	C	North Coast Timberlands and Success Pond No conversion of forest to non-forest use occurs by the FME. TCF's management goals are to preserving working forests as forests.
6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	С	North Coast Timberlands and Success Pond No conversion of forest to non-forest use occurs by the FME. TCF's management goals are to preserving working forests as forests.
6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.	с	North Coast Timberlands and Success Pond No conversion of natural or semi-natural stands to plantations occurs by the FME. TCF's management goals include restoring landscapes to naturally-occurring forest ecosystems.
6.10.e Justification for land-use and stand- type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.1)	NA	North Coast Timberlands and Success Pond No land-use or stand-type conversions occur by the FME.
6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are	NA	North Coast Timberlands and Success Pond No conversion of forest to non-forest use occurs by the FME. TCF's management goals are to preserving working forests as forests.

identified on maps. The forest owner or		
manager consults with the CB to determine		
if removal of these areas from the scope of		
the certificate is warranted. To the extent		
allowed by these transferred rights, the		
forest owner or manager exercises control		
over the location of surface disturbances in		
a manner that minimizes adverse		
environmental and social impacts. If the		
certificate holder at one point held these		
rights, and then sold them, then		
subsequent conversion of forest to non-		
forest use would be subject to Indicator		
6.10.a-d.		
D7 A management plan - and rearists to the		intensity of the energy intensity of the energy of the
		I intensity of the operations shall be written, implemented,
	s or mana	agement, and the means of achieving them, shall be clearly
stated.		
C7.1. The management plan and	С	
supporting documents shall provide:		
a) Management objectives. b) description		
of the forest resources to be managed,		
environmental limitations, land use and		
ownership status, socio-economic		
conditions, and a profile of adjacent lands.		
c) Description of silvicultural and/or other		
management system, based on the ecology		
of the forest in question and information		
gathered through resource inventories. d)		
Rationale for rate of annual harvest and		
species selection. e) Provisions for		
monitoring of forest growth and dynamics.		
f) Environmental safeguards based on		
environmental assessments. g) Plans for		
the identification and protection of rare,		
threatened and endangered species.		
h) Maps describing the forest resource base		
including protected areas, planned		
management activities and land ownership.		
i) Description and justification of harvesting		
techniques and equipment to be used.		
7.1.a. The management plan identifies the	С	North Coast Timberlands and Success Pond
ownership and legal status of the FMU and		TCF has a range of management planning documents. At a
I ownership and regaristatus of the rivio allu	1	

its resources, including rights held by the owner and rights held by others.		harvest level, state THPs are permits that function as management plans. Individual forest tracts are covered by IRMPs. Finally, a policy digest has been compiled, containing overarching policies and guidance applicable to the entire system. These management planning documents contain parcel assessors and deed information, detailing the ownership and legal status of the FMU and its resources and rights held by the owner and others (e.g., easements).
7.1.b. The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).	C	North Coast Timberlands and Success Pond These elements are contained in the California IRMPs and the Success Pond plan.
 7.1.c. The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions. 	С	North Coast Timberlands and Success Pond Responses to findings from back in 2011 and 2012 have ensured that the management planning documents now contain these elements in TCF's properties. Auditors confirmed that compliance with this indicator continues in 2017.
7.1.d. The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.	C	North Coast Timberlands The policy digest describes landscape features and the general landscape as part of the RSA analysis. The FME has also created <i>Conservation Prospects</i> —a synthesis of conservation plans for the North Coast by watershed unit that describes conditions and watershed priorities. Success Pond The elements in this indicator are also contained in the Success Pond plan.
 7.1.e. The management plan includes a description of the following resources and outlines activities to conserve and/or protect: rare, threatened, or endangered species and natural communities (see Criterion 6.2); plant species and community diversity and wildlife habitats (see Criterion 6.3); water resources (see Criterion 6.5); 	C	North Coast Timberlands Special policy sections in the policy digest are devoted to (1) RSA and HCVF analysis, including discussion of underrepresented successional stages of old growth, pygmy, and oak woodlands; (2) description of salmon streams and management; (2) rare ecological communities, including ecological zones descriptions and protections; and (3) management of rare plant communities and habitats. Success Pond The elements in this indicator are also contained in the

soil resources (see Criterion 6.3);		Success Pond plan.
Representative Sample Areas (see Criterion 6.4);		
High Conservation Value Forests (see Principle 9);		
Other special management areas.		
7.1.f. If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).	C	North Coast Timberlands Invasive species management plans are developed for each forest on the North Coast. Invasives are also included in the policy digest and in individual management plans. Success Pond The elements in this indicator are also contained in the Success Pond plan.
7.1.g. The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).	C	North Coast Timberlands and Success Pond Description of diseases and insects are described in the individual management plans, depending on the region, (e.g., sudden oak death, southern pine beetle, beech bark disease, sugar maple borer).
7.1.h. If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.	C	North Coast Timberlands Justification of herbicide use and application is in <i>Herbicide</i> <i>Application and Hardwood Management Policy</i> , as well as in individual management plans as needed. Success Pond No chemicals are used.
7.1.i. If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.	NA	North Coast Timberlands and Success Pond No biological control agents are used on TCF properties, so this indicator is not applicable.
 7.1.j. The management plan incorporates the results of the evaluation of social impacts, including: traditional cultural resources and rights of use (see Criterion 2.1); potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); management of aesthetic values (see 	C	North Coast Timberlands and Success Pond The management plans for these parcels incorporate the results of various evaluations of social impacts of the ownerships on local communities.

Indicator 4.4.a); public access to and use of the forest, and other recreation issues; local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator		
 4.1.g). 7.1.k. The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e). 	C	North Coast Timberlands and Success Pond The management plans for these parcels describe the transportation networks on the ownerships, including purpose, condition, and maintenance.
7.1.1. The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.	с	North Coast Timberlands and Success Pond Management polices describes silvicultural objectives and decision points. Silivicultural objectives are to grow large high-quality trees through the use of selective harvests.
7.1.m. The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.	С	North Coast Timberlands and Success Pond Management plans include detailed harvest rate projections, including a description of how the underlying calculations were made. See discussion for indicators in Criterion 5.6.
7.1.n. The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	С	North Coast Timberlands and Success Pond Management plans include monitoring procedures for yield of all forest products, growth and regeneration rates, composition and changes to flora and fauna, environmental and social impacts, and cost, productivity, and efficiency of forest management (per Criterion 8.2).
7.1.o. The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.	C	North Coast Timberlands and Success Pond Maps are included of all management areas with multiple GIS layers depending on the required use. Maps provided to auditors for site visits were impressive, containing all required data to facilitate a comprehensive evaluation of the forest conditions and harvest planning.
7.1.p. The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the	С	North Coast Timberlands and Success Pond Management plans describes and justifies the types of harvesting machinery to be used on the parcels. These

resource.		include tractor/ground-based and cable/skyline systems.
7.1.q. Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.	С	North Coast Timberlands THPs are prepared and reviewed by CalFIRE before any on- the-ground implementation occurs. The plans describe the forest management activity and the its objectives, outcomes, environmental safeguards, and health and safety measures. They also include detailed maps of the harvest sites, samples of which were ground-truthed by auditors in the field. Success Pond Forest management activities on the parcel are implemented in accordance with the management plan.
7.1.r. The management plan describes the stakeholder consultation process.	С	North Coast Timberlands The stakeholder consultation process is described in the management plan. The process includes public tours as part of THP development and input by the Advisory Council, as well as distribution of letters to tribes that may be affected per state law. Success Pond The forest management plan does not describe the stakeholder consultation process.
C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	C	
7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.	С	North Coast Timberlands The policy digest shows routine updates, and the IRMPs are less than 10 years old. All management plan documentation is up to date as of the date of this report. During the audit last year, it was determined that the management plan for the Garcia River Forest had not been updated since 2006, and a Minor CAR 2016.1 was issued. Likewise, in 2015 there was a delay in getting final approval of the Buckeye IRMP and OBS 2015.3 was issued. The audit team for 2017 confirmed that the FME's actions in addressing these two findings justify closure of the CAR and OBS (see Section 4.1, Existing Corrective Action Requests and Observations). The FME now has a schedule for conducting the 10-year full revisions, which should help to avoid these issues in the

C7.3. Forest workers shall receive adequate	C	future, although the audit team fully recognizes the challenge of working with other partner, which is required as part of the conservation easements. Success Pond The management plan has recently been revised and includes a conservation easement for the entire property This is in the final stages of approval by the State of New Hampshire. Full easement provided for review.
training and supervision to ensure proper implementation of the management plans.	C	
7.3.a. Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	North Coast Timberlands TCF does direct training of new forestry staff, including extensive one-on-one time with the timberlands manager. Opportunities for professional development are also provided to staff. Training log was reviewed. Interviews with operators confirmed that TCF foresters provide regular oversight, including visiting active harvests at least once or twice a week. Additionally, the high-quality of the in-woods work by contractors is an indication that operators are well qualified. Success Pond TCF does direct training of new forestry staff and opportunities for professional development are also provided to staff, confirmed per interview. Foresters
		responsible for the Success tract maintain an SAF certified Forester certificate. Active sites are visited regularly by foresters and qualified operators work in the field, confirmed by on-the-ground observations during site visits and by review of logger training records.
C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	С	
7.4.a. While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	С	North Coast Timberlands Complete management plans (not just summaries) and associated documents are made public on TCF's website. This is in keeping with TCF's commitment to public transparency. Success Pond
		Management plan summary and summary of the

7.4.b. Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address	NA	monitoring program is available at: www.conservationfund/our-work/working-forest- fund/certification North Coast Timberlands and Success Pond TCF is not a public lands manager, so this indicator is not applicable.
		e scale and intensity of forest management to assess the n of custody, management activities and their social and
C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	C	
8.1.a. Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.	С	North Coast Timberlands and Success Pond All monitoring occurs following regular written protocols, as confirmed through an examination of procedures and records.
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c)	С	North Coast Timberlands Inventory plots are established as part of TCF's forest carbon assessment. Data is collected on species, volume, general stand composition, regeneration, brush species,

stocking, d) regeneration, and e) stand and		snags and course woody material, and timber quality.
forest composition and structure; and f)		
timber quality.		Additionally, an inventory of timber is conducted approximately every 10 years when Option A, the primary harvest planning document, is updated. There are permanent plots on some forests that are re-measured every 10 years to assess forest growth.
		Pre- and post-harvest cruises are conducted for harvest sites. Inventory is updated at that time for the harvested areas.
		Success Pond
		Pre- and post-harvest cruises are conducted for harvest sites. Inventory is updated at that time for the harvested areas.
8.2.a.2. Significant, unanticipated removal	С	North Coast Timberlands
or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.		Unanticipated removal is accounted for in the forest inventory system and is monitored. In 2012, there was a 700-acre wildfire that resulted in removal of timber (the area was re-inventoried), but there have been no significant unanticipated removals since. TCF staff have a regular presence on the ground, so they are able to quickly detect, record, and monitor such losses.
		Success Pond
		No such losses have occurred.
8.2.b The forest owner or manager	С	North Coast Timberlands
maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.		The FME keeps records of all harvested timber, including volume, product, and grade. For forest carbon (the only commercial NTFP on the parcels), meticulous records are kept of numerous metrics.
		Success Pond
		The FME keeps records of all harvested timber, including volume, product, and grade.
8.2.c. The forest owner or manager	С	North Coast Timberlands
periodically obtains data needed to monitor presence on the FMU of: Rare, threatened and endangered species and/or their <i>habitats</i> ;		Monitoring of RTE species occurs prior to harvest when such species have been identified on state databases as part of the THP process. The FME also has spotted owl surveys conducted on each forest every year. Botanists are also
Common and rare plant communities and/or habitat; Location, presence and abundance of		contracted to conduct annual surveys related to locations of rare plant communities. Invasive species and control measures are monitored as part of the THP process. The Garcia River ERN is monitored by TNC. HCVF monitoring
invasive species;		recorded as part of annual review.

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

8.2.d.4. Stakeholder responses to	с	North Coast Timberlands and Success Pond
management activities are monitored and recorded as necessary.		TCF staff maintain a log of outreach and communication with the local public, as well as documents any complaints or conflicts that arise. Based on interviews with stakeholders, TCF is well regarded in the local community as a good forest steward and an important contributor to the local economy.
8.2.d.5. Where sites of cultural significance	С	North Coast Timberlands
exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).		No sites of cultural significance have yet been found. However, while planning a THP, the organization's foresters consult with tribes who historically occupied the area; this is a requirement of the California FPA Rules if an archeological site is found.
		Success Pond
		No sites of cultural significance have yet been found; if discovered, foresters will communicate with tribal representatives.
8.2.e. The forest owner or manager	С	North Coast Timberlands and Success Pond
monitors the costs and revenues of management in order to assess		All costs and revenues, including those for each harvest unit and other management activities, are tracked as part of
productivity and efficiency.		normal business operations.
C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	C	
8.3.a. When forest products are being sold	С	North Coast Timberlands and Success Pond
as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.		TCF's control system includes labeling trip tickets with the FSC claim and code, which accompany each log load from the forest to its destination. All of TCF's North Coast properties and all of Success Pond are FSC-certified, so there is no chance of mixing prior to log trucks leaving the properties. For more information, see audit report's Appendix 3: Tracking, Tracing and Identification of Certified Products.
9.2 h The ferret owner or receiver	6	
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	С	North Coast Timberlands and Success Pond TCF has a documented control system covering its stump to gate chain of custody. Trip tickets and sales documentation from recent sales were reviewed. For more information, see audit report's Appendix 3:
	1	

		Tracking, Tracing and Identification of Certified Products.
C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.		
8.4.a. The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	С	North Coast Timberlands and Success Pond The degree to which objectives have been met are considered in the annual management review.
8.4.b. Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.	C	North Coast Timberlands and Success Pond Revisions to management plans over the years demonstrate how TCF is using its monitoring efforts to adjust its management. Examples include adjusting inventory projections in response to an unexpected loss and modifying silviculture prescriptions based on past results.
C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	С	
8.5.a. While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	C	North Coast Timberlands TCF is very open about the results of monitoring. A summary is produced in its annual reports and made available online and to interested stakeholders. In response to OBS 2016.2, TCF updated its website to include each forest's IRMP and the Sustained Yield Plan Option A in easily-accessible locations. The 2017 audit team has closed this observation (see report Section 4.1, Existing Corrective Action Requests and Observations). Success Pond Summary of monitoring information is publically available at: https://www.conservationfund.org/images/The Conservati on Fund Public Monitoring Summary for Website 2015.

		<u>pdf</u>	
P9 Management activities in high conservation	on value f	orests shall maintain or enhance the attributes which define	
such forests. Decisions regarding high conservation value forests shall always be considered in the context of a			
precautionary approach.			
High Conservation Value Forests are those th	at posses	ss one or more of the following attributes:	
Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance			
Forest areas that are in or contain rare, threa	tened or	endangered ecosystems	
Forest areas that provide basic services of na	ture in cr	itical situations (e.g., watershed protection, erosion control)	
Forest areas fundamental to meeting basic ne	eeds of lo	ocal communities (e.g., subsistence, health) and/or critical to	
		of cultural, ecological, economic or religious significance	
identified in cooperation with such local com	munities)).	
C9.1. Assessment to determine the	С		
presence of the attributes consistent with			
High Conservation Value Forests will be			
completed, appropriate to scale and			
intensity of forest management.			
9.1.a. The forest owner or manager	С	North Coast Timberlands	
identifies and maps the presence of High	-	TCF conducted an HCVF analysis based on their firsthand	
Conservation Value Forests (HCVF) within		knowledge of the forest and relying on external	
the FMU and, to the extent that data are		conservation planning efforts. Four forest features were	
available, adjacent to their FMU, in a		identified: (1) oak woodlands and grasslands; (2) pygmy	
manner consistent with the assessment		cypress forest; (3) old growth coniferous forest, and (4)	
process, definitions, data sources, and		salmonid spawning streams. All features are described and	
other guidance described in Appendix F.		mapped in the management plans and policy digest.	
		Bobcat Ridge's HCVF analysis led to the designation of the	
Given the relative rarity of old growth		bottomland hardwood area along the Neches river.	
forests in the contiguous United States,		Success Pond	
these areas are normally designated as		Success Pond HCVF and RSA assessments are detailed in	
HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and		their management plan and in Appendix 2 of the plan. While	
requirements for legacy trees in Indicator		no true HCVFs have been delineated, there are ecologically	
6.3.f.		significant natural community complexes, primarily	
0.5.1.		wetlands totaling 106 acres, that are protected through the	
		conservation easement and through other current	
		management protections, such as wetland and riparian	
		buffers and are therefore noted as HCVs in Appendix 2.	
9.1.b. In developing the assessment, the	С	North Coast Timberlands	

forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.		In its process of designating HCVFs, TCF consulted its local Advisory Council and relied on external efforts in conservation biology planning and consultation done by adjoining FSC-certified landowners. Success Pond TCF consulted with a regional ecologist and botanist from Marshfield, VT and is detailed in Appendix 2 of the management plan.
9.1.c. A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	North Coast Timberlands Assessment results are made public on TCF's website. Success Pond Summary of monitoring information is publically available at: https://www.conservationfund.org/images/The_Conservati on Fund Public Monitoring Summary for Website 2015. pdf
C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	С	
9.2.a. The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.	C	North Coast Timberlands and Success Pond See discussion in 9.1.b.
9.2.b. On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	NA	North Coast Timberlands and Success Pond TCF is not a public forest, so this indicator is not applicable.
C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures	С	

available management plan summary.		
9.3.a. The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.	С	North Coast Timberlands and Success Pond Protection measures for HCVF areas are described in the policy index. No management generally occurs in areas designated as HCVF.
9.3.b. All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	С	North Coast Timberlands and Success Pond Management would only occur in an HCVF in a way that would preserve or maintain the HCV.
9.3.c. If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	С	North Coast Timberlands Cross-boundary HCVF issues are most relevant in aquatic systems. Examples of collaboration include the working with local stakeholders on the Big River and cooperation with neighboring FSC-certified landowners such as Mendocino Redwood Company.
C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	С	
9.4.a. The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	North Coast Timberlands and Success Pond TCF conducts extensive monitoring to assure that HCVs are maintained and that the management program for HCVFs is effective. For example, TCF has some specific monitoring programs associated with HCVF features, such as EMAP aquatic monitoring on Class 1 streams. The results of HCVF monitoring is recorded in as part of the annual program meeting review.
9.4.b. When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to	NA	North Coast Timberlands and Success Pond No observed threats have occurred in relation to TCF's HCVF areas so far, so this indicator is not applicable.

the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.

Principle 10 is not applicable since TCF is not practicing plantation forest management, as defined by FSC.

APPENDICES

APPENDIX C: REGIONAL LIMITS AND OTHER GUIDELINES ON

OPENING SIZES

This Appendix contains regional Indicators and guidance pertinent to maximum opening sizes and other guidelines for determining size openings and retention. These Indicators are requirements based on FSC-US regional delineations

Indicator 6.3.g.1		
PACIFIC COAST REGION		
Indicator 6.3.g.1.a: Within harvest openings larger than 6 acres, 10-30% of pre-harvest basal area is retained. The levels of green- tree retention depend on such factors as: opening size, legacy trees, adjacent riparian zones, slope stability, upslope management, presence of critical refugia, and extent and intensity of harvesting across the FMU. Retention is distributed as clumps and dispersed individuals, appropriate to site conditions. Retained trees comprise a diversity of species and size classes, which includes large and old trees. Regeneration harvest blocks in even- aged stands average 40 acres or less. No individual block is larger than 60 acres.	NA	North Coast Timberlands No harvest openings of this size occur. Largest gaps are limited to 1 acre as part of group selections. Therefore, this indicator is not applicable.
Indicator 6.3.g.1.b Even-aged silviculture may be employed where: 1) native species require openings for regeneration or vigorous young-stand development, or 2) it restores the native species composition, or 3) it is needed to restore structural diversity in a landscape lacking openings while maintaining connectivity of older intact forests. <i>Guidance: In some dry regions, retaining</i> <i>approximately 10 tons of debris per acre</i> <i>may be sufficient. In wetter regions,</i>	NA	North Coast Timberlands Even aged siliviculture is not used (openings are limited to 1 acre, which are essentially group selection cuts), so this indicator is not applicable.

retaining 20 tons of debris per acre may be sufficient. Debris is well distributed spatially and by size and decay class, with a goal of at least 4 large pieces (approximately 20" diameter x 15' length) per acre. Three to 10 snags per acre (averaged over 10 acres) are maintained or recruited. Snags are well represented by size, species, and decay class.		
Indicator 6.3.g.1.c Where necessary to protect against wind throw and to maintain microclimate, green trees and other vegetation are retained around snags, down woody debris, and other retention components.	C	North Coast Timberlands Snags are protected. TCF's limited group openings are unlikely to result in windthrow effects, and no such damage was seen during site visits.
Indicator 6.3.g.1.d Native hardwoods and understory vegetation are retained as needed to maintain and/or restore the natural mix of species and forest structure.	С	North Coast Timberlands TCF protects and encourages the presence of native hardwoods for wildlife purposes. Evidence includes a targeted approach to pesticide use that maintains most competing hardwood species.
Indicator 6.3.g.1.e If regeneration harvest ages do not approach <i>culmination of mean</i> <i>annual increment</i> (CMAI), retention approaches the upper end of the range required in Indicator 6.3.h.1.a (above).	NA	North Coast Timberlands This indicator pertains more so to even-aged management than to the individual tree and small group selection cuts that occur on TCF's properties, so this indicator is not applicable.
Indicator 6.3.g.1.f No logical logging unit adjacent to a logged even-aged regeneration unit may be harvested using an even-aged regeneration method unless/until the prior even-aged regeneration unit is adequately stocked by a stand of trees in which the dominant and co-dominant trees average at least five feet tall and three years of age from the time of establishment on the site, either by planting or by natural regeneration. If the requirement to achieve adequate stocking is to be met with trees that were present at the time of harvest, there shall be a period not less than five years following the completion of operations before an adjacent even-aged regeneration harvest	NA	North Coast Timberlands This indicator pertains more so to large, even-aged cuts than to the individual tree and small group selection cuts that occur on TCF's properties, so this indicator is not applicable.

may occur.				
APPENDIX E: STREAMSIDE MANAGEMENT ZONE (SMZ) REGIONAL REQUIREMENTS				
Indicator 6.5.e				
This Appendix addresses regionally explicit re	quireme	nts for Indicator 6.5.e and includes SMZ widths and activity		
limits within those SMZs for the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest,				
Rocky Mountain, and Pacific Coast regions. The forest owner or manager will be evaluated based on the sub-				
indicators within their specific region, below.				
PACIFIC COAST REGION				
PC Applicability note: The following water qua	ality requ	irements of this Standard are superseded when and where		
state or federal laws, regulations, or other co	ntractua	l requirements are more stringent.		

PC Guidance: This section uses the following definitions:

Category A stream: A stream that supports or can support populations of native fish and/or provides a domestic water supply.

Category B stream: Perennial streams that do not support native fish and are not used as a domestic water supply.

Category C stream: An intermittent stream that never the less has sufficient water to host populations of non-fish aquatic species

Category D stream: A stream that flows only after rainstorms or melting snow and does not support populations of aquatic species

6.5.e.1.a (PC only) For Category A streams,	С	North Coast Timberlands
and for lakes and wetlands larger than one acre, an inner buffer zone is maintained. The inner buffer is at least 50 feet wide (slope distance) from the active high water mark (on both sides) of the stream channel and increases depending on forest type, slope stability, steepness, and terrain. Management activities in the inner buffer:		TCF has a 50-foot no harvest buffer on Class 1 watercourses (equivalent to Category A).
maintains or restore the native vegetation are limited to single-tree selection silviculture		
retain and allows for recruitment of large live and dead trees for shade and stream structure		
retain canopy cover and shading sufficient to moderate fluctuations in water temperature, to provide habitat for the full complement of aquatic and terrestrial species native to the site, and maintain or		

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

 A 75-foot (slope distance) outer buffer (for a total buffer of 100 feet) is created and managed according to provisions for outer buffer for Category A. 6.5.e.1.d (PC only) For Category C streams, and for lakes and wetlands smaller than one acre, a buffer zone 75 feet wide (on both sides of the stream) is established that constrains management activities to those that are allowed in outer buffer zones of 	C	North Coast Timberlands For Category C streams, buffer requirements are met through use of single tree selection.
Category A streams. 6.5.e.1.e (PC only) For Category D streams, management: maintains root strength and stream bank and channel stability	С	North Coast Timberlands For Category D streams, buffer are requirements met through use of single tree selection.
recruits coarse wood to the stream system minimizes management-related sediment transport to the stream system.		
Streams, vernal pools, lakes, wetlands, seeps, springs, and associated riparian areas are managed to maintain and/or restore hydrologic processes, water quality, and habitat characteristics (see NMFS (1996); state water quality standards; Karr (1981) which may include: the capacity for water to infiltrate the soil; habitat for riparian species; moderating water temperature; controlling sedimentation; clean gravel for spawning; physical structures to protect the integrity of the stream channel; including pools used by anadromous fish.		
Forest owners or managers retain and recruit sufficient large, green trees; snags; understory vegetation; down logs; and other woody debris in riparian zones to provide shade, erosion control, and in- channel structures.		
Southeast Region 6.5.e.1 (SE only) Streamside or special management zones (SMZs) are specifically described and/or referenced in the	NE	No parcels in the Southeast Region were evaluated this year.

management plan, included in a map of the	
forest management area, and designed to	
protect and/or restore water quality and	
aquatic and riparian populations and their	
habitats (includingriver and stream	
corridors, steep slopes, fragile soils,	
wetlands, vernal pools, seeps and springs,	
lake and pond shorelines, and other	
hydrologically sensitive areas).	
At a minimum, management of SMZs has	
the following characteristics:	
Management meets or exceeds state	
BMPs.	
SMZ width reflects changes in forest	
condition, stream width, slope, erodibility	
of soil, and potential hazard from	
windthrow along the length of the	
watercourse.	
SMZs provide sufficient vegetation and	
canopy cover to filter sediment, limit	
nutrient inputs and chemical pollution, moderate fluctuations in water	
temperature, stabilize stream banks, and	
provide habitat for riparian and aquatic	
flora and fauna.	
Characteristic diameter-class distributions,	
species composition, and structures are	
adequately maintained within the SMZs.	

Appendix 6 – Tracking, Tracing and Identification of Certified Products

SCS FSC Chain of Custody Indicators for Forest Management Enterprises

REQUIREMENT	c/NC	COMMENT/CAR
1. Quality Management		<u></u>
 1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization's compliance with all applicable requirements of this standard. 1.2 The FME shall maintain complete 	C	North Coast Timberlands and Success Pond TCF has appointed such a management representative in its procedures. North Coast Timberlands and Success Pond
records of all FSC-related COC activities, including sales and training, for at least 5 years.		Auditors confirmed that COC-related records are kept on file for at least 5 years.
1.3 The FME shall define its forest gate(s) (check all that apply): The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.	C	 North Coast Timberlands and Success Pond: Stump Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest. On-site concentration yard Transfer of ownership of certified-product occurs at concentration yard under control of FME. Off-site Mill/Log Yard X Transfer of ownership occurs when certified-product sunloaded at purchaser's facility. Auction house/ Brokerage Transfer of ownership occurs at a government-run or private auction house/ brokerage. Lump-sum sale/ Per Unit/ Pre-Paid Agreement A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale. Log landing Transfer of ownership of certified-product occurs at landing/yarding areas. Other (Please describe):

1.4 The FME shall have sufficient control	С	North Coast Timberlands and Success Pond
over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest		TCF sells delivered logs to the mill, not to individual
products covered by the scope of the		loggers, which reduces the risk of a logger mixing a load
FM/COC certificate with forest products		of certified and non-certified material from separate
from outside of the scope prior to the		sites. Trip ticket system is used to maintain
transfer of ownership.		documentation during transport.
1.5 The FME and its contractors shall not	С	North Coast Timberlands and Success Pond
process FSC-certified material prior to		TCF does not process material prior to the transfer of
transfer of ownership at the forest gate		ownership.
without conforming to applicable chain of		
custody requirements.		
NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or		
on-site processing of chips/biomass		
originating from the FMU under evaluation.		
2. Product Control, Sales and Delivery		
2.1. Products from the certified forest area	С	North Coast Timberlands
shall be identifiable as certified at the		All logs cut from the FMUs are marked on the end with a
forest gate(s).		green dot painted on.
		North Coast Timberlands and Success Pond
		Each load of logs includes a trip ticket with the
		certification code and claim. This stays with the trucker,
		with a copy going to the scaler at the mill and another
		copy going to the logger.
2.2 The FME shall maintain records of	С	North Coast Timberlands and Success Pond
quantities/volumes of FSC-certified		TCF's procedures describe measures for maintaining
product(s).		records and volumes for FSC and financial auditing. TCF
		maintains records of all sold material.
2.3. The FME shall ensure that all sales	С	North Coast Timberlands and Success Pond
documents issued for outputs sold with		
FSC claims include the following		TCF's trip ticket include all of this information, as do
information:		other sales documents.
a) name and contact details of the		
organization;		
b) name and address of the customer;		
c) date when the document was		
issued;		
d) description of the product;e) quantity of the products sold;		
 e) quantity of the products sold; 		

6.1.2			
	D-40-004 V2-1 Clause 6.1.1 and		
	.3 and 2.4 above are based on		
	e shipment of the product.		applicable.
	delivery documentation, if the sales ent (or copy of it) is not included		same information as 2.3, so this indicator is not
	ation as required in 2.3 in the		Trip tickets accompany all timber sales and include the
-	FME shall include the same	NA	North Coast Timberlands and Success Pond
	to each other.		
	related transport documentation		
	to link the sales document and		
	are issued, information sufficient		
h)	If separate transport documents		
	product groups.		
	FSC Controlled Wood		
	Wood" for products from		
	ii. the claim "FSC Controlled		
	product groups;		
	products from FSC 100%		
	i. the claim "FSC 100%" for		
	products as follows:		
0/	each product item or the total		
g)	clear indication of the FSC claim for		
	Controlled Wood (CW/FM) code;		
.,	Management (FM/COC) or FSC		
f)	the organization's FSC Forest		

 2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in 	NA	North Coast Timberlands and Success Pond The FME includes the required claim, so this indicator is not applicable.
the supplementary evidence.		
FSC-ADVICE-40-004-05		
3. Labeling and Promotion		n/a
3.1 Describe where/how the organization	NC	North Coast Timberlands and Success Pond
uses the SCS and FSC trademarks for promotion.		The FME is using the FSC trademark in publicly-facing materials, including on its website, annual reports, and IRMPs. It has approval for use of the trademark on the website and their annual reports. However, on the website for the Working Forest Fund, the acronym "FSC" is missing a trademark symbol. Additionally, FSC trademarks in the Garcia River IRMP lack the trademark symbols. See Minor CAR 2017.5 .
3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.	NC	North Coast Timberlands and Success Pond There is no record of approval of the use of trademarks for the Garcia River IRMP. See Minor CAR 2017.5.

3.3 Records of SCS and/or FSC trademark	NC	North Coast Timberlands and Success Pond
use authorizations shall be made available		There is no record of approval of the use of trademarks
upon request.		for the Garcia River IRMP. See Minor CAR 2017.5
4. Outsourcing		n/a
4.1 The FME shall provide the names and	С	North Coast Timberlands and Success Pond
contact details of all outsourced service providers.		Outsourced activities include logging, transport, road construction, spraying, and planting. These are considered low-risk activities under COC rules. The FME has provided the names and contact information for loggers and other contractors.
4.2 The FME shall have a control system for	С	North Coast Timberlands and Success Pond
 the outsourced process which ensures that: a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for 		Risk of mixing of material could only occur in transport and is very low. TCF issues the final invoice to the mill, not the loggers. Outsource providers do not use the FSC logo.
promotional use.		
5. Training and/or Communication Strategie	25	
5.1 All relevant FME staff and outsourcers	С	North Coast Timberlands and Success Pond
shall be trained in the FME's COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME's COC control system.		TCF's procedures address training of staff and/or applicable contractors, including frequency of training. COC training agendas and sign-in forms were reviewed.

5.2 The FME shall maintain up-to-date	С	North Coast Timberlands and Success Pond
records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).		TCF's COC procedures are the primary method of communication. Trainings be tracked via a database and include a list of trained staff and contractors.

SCS Trademark Annex for FMEs: FSC Trademarks, FSC-STD-50-001 V1-2

N/A, does not use/intend to use FSC trademarks for any purposes (finished with this section); or

N/A, is fully integrated and all trademark uses are treated under the COC Annex to this report that includes a full review of FSC-STD-40-004 and FSC-STD-50-001.

NOTE: This section is applicable for all organizations that use or *intend* to use any FSC trademarks for *promotional and/or on-product purposes*. For evaluation audits, it is acceptable to mark C if the client demonstrates an adequate awareness of the requirements through interviews and other applicable evidence. A requirement should be marked NC and a corresponding CAR should be issued for any nonconformance identified, such as use of FSC trademarks prior to granting of certification.

Description of how the organization currently uses, or intends to use, FSC trademarks and/or labels, including but not limited to printed materials, Internet applications, on-product labeling, and other public- facing media:	The FME currently uses the FSC trademark on its website and in sales documents.
FSC-STD-50-001 V1-2, 1.9	

Products intended to be labeled or promoted as FSC certified are included in the organization's certified product group list.

X C NC C w/Obs

Evidence: Products are identified by species as raw logs of species identified and confirmed during the 2017 audit.

 FSC-STD-50-001 V1-2, 1.4, 1.6 - 1.8, 1.13 - 1.14 The organization does <u>not</u> use the FSC trademarks in the following ways: in connection with the sale or promotion of FSC Controlled Wood (§1.4) in any way that could cause confusion, misinterpretation or loss of credibility to the FSC certification scheme (§1.6) to imply any FSC endorsement or responsibility of the organization's activities outside of the certificate scope (§1.7) to imply any FSC responsibility for the production of products, documents or promotional materials (§1.8) in product brand names, company names or website domain names (§1.13) translated to another language with no English included (§1.14) 	X C NC C w/Obs	
FSC-STD-50-001 V1-2, 7.2 The FSC trademarks are not used together with the marks of other forest certification schemes in a way which implies equivalence or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.	X C NC C w/Obs	
Sections 1.4, 1.6 – 1.8, 1.13, 1.14, and 7.2 Evidence: Auditor reviewed documents associated with FSC claims and verified conformance with these indicators.		
FSC-STD-50-001 V1-2, 1.11 Any information about FSC that is in addition to FSC trademarks and labels included in any material has been given prior approval by SCS.	C NC C w/Obs x N/A, no additional FSC information	
FSC-STD-50-001 V1-2, 1.15 The use of the FSC "checkmark-and-tree" logo is directly accompanied by the appropriate trademark symbols [®] or [™] (in superscript font). The appropriate symbol also accompanies the first use of "FSC" and "Forest Stewardship Council" in any text.		
 NOTES: The use of trademark registration symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer/ statement specified in requirement 7.5 of FSC-STD-50-001 V1-2. The registration symbol is required for any other use of initials "FSC" on documents; however, the omission of the use of trademark registration symbol in promotional texts related to FSC on invoice templates, delivery notes and similar documents is possible if the software used to produce these documents does not support trademark registration symbols. This exception only applies to the use of the trademark registration symbol for the initials "FSC" and the name "Forest Stewardship Council". In January 2014, in Hong Kong, FSC changed the trademark symbol from [®] back to TM. Companies affected by this change which have approved artwork with the [®] registered trademark symbol for distribution in Hong Kong may continue to produce, distribute and sell into the market product using the registered trademark symbol on the FSC trademarks until 1 September 2015, with an additional liquidation period of six months, which expires 1 March 2016. All new artwork must use the TM trademark symbol. Where the FSC initials are used vertically in the traditional way of writing for Asian 	C X NC C w/Obs N/A, one or more of the noted exceptions apply	

nations, the registration status symbol may be used in superscript font in either the top right corner (alongside F), or the bottom right corner (alongside C) as preferred. In this instance, mark "C".	
FSC-STD-50-001 V1-2, 1.16 All FSC trademark uses have been submitted to SCS for approval.	C X NC C w/Obs
Sections 1.11, 1.15 and 1.16 Evidence: See Minor CAR 2017.5.	
FSC-STD-50-001 V1-2, 1.10 All (previously approved) FSC labels only use the FSC label artwork provided on the label generator or otherwise issued or approved by SCS or FSC.	C NC C w/Obs X N/A, no approved FSC labels
FSC-STD-50-001 V1-2, Sections 10, 11 and 12 All (previously approved) FSC labels and logos conform to the standard requirements for color and font (§10.1-10.3, 11.5, 11.7, 11.9), format and size (§10.4 - 10.7, 11.2, 11.3, 11.8), trademark symbol (§10.8, 11.4), FSC trademark license code (§10.9), label text (§10.10 - 10.15) and/or mini label requirements (§10.16 - 10.18). The label or logo is not being misused in any manner described in section 12.2.	C NC C w/Obs X N/A, no approved FSC labels
Sections 1.10, 10, 11 and 12.2 Evidence:	
Promotional use of the FSC trademarks N/A, does not use/intend to use FSC trademarks for promotional purposes	(Skip Promotional section)
NOTE: This section is applicable for all organizations that use or <i>intend</i> to use FSC trademarks for promotional purposes. For evaluation audits, it is acceptable to mark C if the client demonstrates an adequate awareness of the requirements through interviews and other applicable evidence. A requirement should be marked NC and a corresponding CAR should be issued for any nonconformance identified, such as use of FSC trademarks prior to granting of certification.	
FSC-STD-50-001 V1-2, 1.12, 4.4 The FSC trademarks are not used to promote product quality aspects not covered by FSC certification (§ 1.12). Any claims regarding qualities outside the control of FSC, such as other environmental attributes of the product, are separated from text about FSC (§ 4.4).	X C NC C w/Obs N/A, no additional quality claims
FSC-STD-50-001 V1-2, 6.1 Catalogues, brochures, and websites meet the following requirements: a) The promotional panel, or at least the FSC trademark license code, is in a	X C NC C w/Obs

 prominent place. b) When the products are not all on the same page, a link or text such as "Look for FSC certified products" is included next to the panel / code. c) FSC certified products are indicated by using the logo or with "FSC certified" in the product description. 	N/A, do not use trademarks in these items
FSC-STD-50-001 V1-2, 4.1	C
For labeled stationery and brochures printed on FSC-certified paper, the label is	NC
not in such a prominent position as to make it appear that any organization (or its	C w/Obs
products) represented in the publication is endorsed by FSC. (E.g. the FSC label is	X
not placed on the front cover of the brochure or next to images of forest-based	N/A, no such
products which are not FSC certified.)	labeled items
FSC-STD-50-001 V1-2, 6.2	X C
FSC certified products are not promoted using only the SCS Kingfisher and/or SCS	NC
Global Services logo.	C w/Obs
FSC-STD-50-001 V1-2, 7.3	X C
FSC trademarks are not used at the top of document templates such as	NC
letterheads, sales documents and emails.	C w/Obs
FSC-STD-50-001 V1-2, 7.4	X C
The FSC trademarks are not used on business cards to promote the organization's	NC
certification.	C w/Obs
NOTE: If authorization was duly received under the previous trademark standard, the	N/A, approval
organization may use the existing supply until it is depleted. In this case, the approval	granted prior to
must be available and must have been granted prior to July 1, 2011.	July 1, 2011
FSC-STD-50-001 V1-2, 4.2 If a business card is printed on FSC-certified paper, the mini label with product type is used at minimum size. The use of the mini label does not imply that the organization is affiliated with FSC.	C NC C w/Obs X N/A, no labeled business cards
FSC-STD-50-001 V1-2, 8.1, 8.2	C
All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.)	NC
display, at minimum, the FSC logo and FSC trademark license code (§8.1). Any	C w/Obs
promotional items made wholly or partly of wood (e.g., pencils, memory sticks,	N/A, no FSC labels
etc.) meet the applicable labeling requirements specified by FSC-STD-40-004	X on promotional
(§8.2).	items
FSC-STD-50-001 V1-2, 8.3	

For FSC trademarks used for promotion at trade fairs the organization has clearly marked which products are FSC certified and the products carry an FSC label; or if no products are displayed, a visible disclaimer stating, "Ask for our FSC certified products," or, "We can provide FSC certified products upon request," is present. NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.	C NC C w/Obs N/A, no FSC trademarks used for promotion at trade fairs	
FSC-STD-50-001 V1-2, 9.1, 9.2 The organization takes full responsibility for the use of FSC trademarks by investment companies and others making financial claims based on their FSC certified operations (§9.1). Any such claims are accompanied by the disclaimer, "FSC is not responsible for and does not endorse any financial claims on returns on investments" (§9.2).	C NC C w/Obs N/A, no investment claims about FSC operations	
Promotional Trademarks Section Evidence: Most of these materials are not being used for any FSC trademarks or claims. Such use is limited to the company's website and sales documents.		
Number and variety of promotional trademarks and associated approval records reviewed: A limited sample of items were reviewed. The FME's website, sales document, brochures, staff business cards, signs, and miscellaneous documents were reviewed. Only the website and sales documents contained the FSC trademark (see Minor CAR 2017.3).		
Rationale that sample choice is sufficient to confirm system is functioning effectively and as described: Since the FME only uses the FSC trademark on its website and in its sales documents, only a limited sample of items were reviewed.		
Using the FSC labels on products		
X N/A, does not use/intend to use FSC on-product/packa	aging labels (Skip section 11)	
NOTE: This section is applicable for all organizations that use or <i>intend</i> to use FSC trademarks for on-product purposes. For		

evaluation audits, it is acceptable to mark C if the client demonstrates an adequate awareness of the requirements through interviews and other applicable evidence. A requirement should be marked NC and a corresponding CAR should be issued for any nonconformance identified, such as use of FSC trademarks prior to granting of certification.

Appendix 7 – Peer Review and SCS Evaluation Team Response to Peer Review

No peer review was conducted as part of this reassessment.

Appendix 8 – SLIMF Eligibility Criteria

An FMU qualifies as a 'SLIMF' if it is either a 'small' FMU OR managed as a 'low intensity' FMU. Any SLIMF FMU under the scope of the FME under evaluation must meet at least one of the following criteria:

N/A – none of the FMU(s) under evaluation qualify as a SLIMF according to the criteria below.	
X 'Small' FMU(s)	The scope of the certificate includes FMU(s) of 100 ha (247 acres) or less.
	X The scope of the certificate includes FMU(s) located in a country for which the definition for maximum size of "small" is larger than 100 ha (247 acres), but does not exceed 1,000 ha (2, 471 acres).
	The scope of the certificate includes FMU(s) of 1000 ha (2,471 acres) or less where there is no FSC-accredited national initiative and the national stakeholders support the larger size-limit proposed by the certification body.
'Low intensity' FMU(s) – The scope of the certificate	The annual harvest from the total production forest area is less than 5000 cubic meters (2.1 million board feet).
includes FMU(s) in which the rate of harvest is less than 20% of the mean annual increment (MAI) AND these FMUs meet one of the following additional criteria:	The average annual harvest from the total production forest is less than 5000 m3 / year (2.1 million board feet / year) during the period of validity of the certificate as verified by harvest reports and surveillance audits.

Appendix 9 – Group Management Programs

This is not a group certificate.