

The Conservation Fund

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Chapel Hill, NC 27514

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SFI® 2015-2019 Forest Management Standard

Surveillance Audit



NSF International

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NSF Forestry Program Audit Report

A. Certificate Holder

The Conservation Fund

NSF Customer Number

C0144679

Contact Information (Name, Title, Phone & Email)

David B. Whitehouse, CWB
 Forest Operations Manager, Working Forest Fund®
 Office number: 919-951-0118; Mobile number: 601-421-6934
dwhitehouse@conservationfund.org

B. Scope of Certification

The management of lands in The Conservation Fund's Working Forest Fund and related properties including SFI objectives 1-12, 14 and 15. The SFI Forest Management number is NSF-SFI-FM-C0144679.

Locations Included in the Certification

Dual-Certified Properties		
Property	State	Acres
Garcia	CA	24,000
Big River/Salmon Creek	CA	16,050
Gualala	CA	13,913
Buckeye	CA	19,650
East Grand Lake	ME	4,544
Success Pond	NH	8,910
Penfield	PA	2,041
McConnell Pond	VT	4,638
Cranberry Lake	NY	8,162
Reed	ME	32,431

SFI-Only Properties					
Property	State	Acres	Property	State	Acres
Little River Canyon Preserve	AL	58	Lower Devil's Swamp Little Biloxi Wolf River	MS	1,928
Mendocino National Forest	CA	280	Reeves Jackson	NC	1,276
Cleveland National Forest – New 2018	CA	306	Bunker Hill Covered Bridge – New 2018	NC	3
Okefenokee NWR	GA	9,376	Bald Cap	NH	1,227
Chattahoochee – New 2018	GA	215	Waccamaw NWR	SC	28
Pinhoti Trail	GA	1,511	Francis Marion	SC	10
Maritime Marine WMA	MD	100	Redtown	TX	908
Galestown Creek	MD	28	Big Thicket	TX	594
Chesapeake	VA	8,710	Brunswick	NC	3,670
Petersburg	VA	212	CFI	GA	14,225
Biddle/Bray	VT	290	Yankee (VT, NH)	VT	13,495
AT Bridgewater Barnard	VT	217		NH	8,421
Spruce Peak	VT	14	Twin Lakes	WI	13,732
Canaan Valley Refuge	WV	1	Logan	WV	16,229
Cleveland National Forest	CA	306			



New SFI 2018		
Property	State	Acres
Skinner Mountain	TN	14,770
Cowee (Bly Hollow)	NY,VT	22,563

C. Audit Team

Tucker Watts

Audit Date(s) (If multiple locations were audited, indicate the date of each site visit)

September 5-6, October 2-3, December 14, 2018

D. Significant Changes to Operations or to the Standard(s)

Purchase and sale of properties and acreage.

E. Audit Results

- No nonconformities or opportunities for improvement were identified.
- There was/were _____ opportunity(ies) for improvement identified. Summary:

There was/were _____ minor nonconformity(ies) identified. Summary:

There was/were _____ major nonconformity(ies) identified. Summary:

Issues identified at previous audits reviewed for continued conformance. Summary:

N/A

- Yes No N/A (not using) All logos and/or labels, including ANSI, ANAB, SFI, PEFC, ATFS, etc., are utilized correctly in accordance with NSF SOP 14680 and SOP 4876. If answering "No", a finding of nonconformity should be issued.

For Reassessment Audits:

Explain how the organization maintained and demonstrated the effectiveness and improvement of its system, including interactions between processes and locations, taking into consideration internal and external changes in order to enhance overall performance of policy and objectives.

Review the performance of the system over the period of certification (e.g., management review records, internal audit records, etc.), and the previous surveillance audit reports. Identify the records that were reviewed.

Answer: N/A - Surveillance

F. Appendices

[Appendix 1:](#) Audit Notification Letter and Audit Agenda

[Appendix 2:](#) SFI Forest Management Public Summary Report

[Appendix 3:](#) Audit Standard Checklist - SFI Forest Management Standard

[Appendix 4:](#) Meeting Attendance

**Appendix 1****Audit Notification Letter**

August 12, 2018

David Whitehouse, Forest Operations Manager, Working Forest Fund®
 The Conservation Fund
 77 Vilcom Center, Suite 340
 Chapel Hill, NC 27514

RE: 2018 SFI Surveillance Audit

Dear David,

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

Audit Scope

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

The current scope includes these properties:

Dual-Certified Properties		
Property	State	Acres
Garcia	CA	24,000
Big River/Salmon Creek	CA	16,050
Gualala	CA	13,913
Buckeye	CA	19,650
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Cleveland National Forest	CA	306			

New SFI 2018			
Property	State	Acres	
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Cowee (Bly Hollow)	NY,VT	22,563	

During the 2018 audit the following properties will be visited:

- Properties within existing scope (5 of 37): North Coast, California (4 of 4 properties), Reed Plantation in Maine;
- Associated with scope expansion (1 of 2):
- Cowee (Bly Hollow) 22,795 acres Active

Preparing for the Audit

I would like to review evidence of the following:

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

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

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

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

SFI Requirements Selected for 2018 Surveillance Audit

Objectives 1-15 Requirements for Forest Management Standard

2. Forest Health and Productivity
4. Conservation of Biological Diversity
6. Protection of Special Sites
8. Recognize and Respect Indigenous People' Rights
11. Training and Education
12. Community Involvement and Landowner Outreach
14. Communication and Public Reporting
15. Management Review and Continual Improvement

Please have this information available for me **during the audit**.

Scope of Certification: The management of lands in The Conservation Fund's Working Forest Fund and related properties including SFI objectives 1-12, 14 and 15. The SFI Forest Management number is NSF-SFI-FM-C0144679.



Role of SFI Inc. Office of Label Use and Licensing

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

Rachel Hamilton, Coordinator, Office of Statistics and Label Use
Sustainable Forestry Initiative, Inc.
343-803-0590
rachel.hamilton@sfiprogram.org

Agenda for Review

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

Thank you for selecting NSF to provide your audit services.

Sincerely,

Tucker Watts

Lead Auditor, NSF
601-622-6487
Jtwatts1@gmail.com



Audit Agenda

Type of Audit

- Readiness Review (Stage 1) Registration (Stage 2) Surveillance
 Reassessment Transfer Verification
 Other _____

Audit Objectives

Determine if certification should be maintained to SFI 2015-2019 Standards and Rules®, Section 2 – Forest Management.

General Schedule

Audit Type	Location	Tract	Date	Day	Travel Day	Auditor	TCF Rep
FSC	New York	Cranberry Lake	9/5/18	Wednesday	Tuesday, Friday	Watts	Whitehouse
SFI	New York, Vermont	Cowee (Bly Hollow)	9/6/18	Thursday	Tuesday, Friday	Watts	Whitehouse
SFI/FSC	Maine	Reed	12/14/18	Friday	Thursday, Friday	Watts	Whitehouse
SFI/FSC	California	4 properties	10/2-3/18	Tuesday, Wednesday	Monday, Thursday	Watts, Bergmann	Whitehouse, Newberger

Detailed Schedule

Day/Date	Time	Activity/Process and Location to be Audited
September 4		Arrive Albany – Watts 11:40 AM; Whitehouse 1:47 PM
September 5	8 am	FSC only - Cranberry Lake FMU: Field Audit
September 6	8 am	SFI only - Cowee (Bly Hollow) FMU: Field Audit
September 7	Morning	Return home
December 13	6 pm	Arrive Bangor – Watts 3:26 PM; Whitehouse 3:49 PM
December 14	8 am	FSC/SFI – Reed FMU: Field Audit Return home
October 1	Afternoon	Meet in San Francisco
October 2	8:00 am	FSC/SFI – Big River, Salmon Creek FMUs: Field Audit
October 3	8:00 AM	FSC/SFI – Garcia, Gualala River FMUs: Field Audit Return to San Francisco
October 4		Return home

Appendix 2

The Conservation Fund 2018 SFI Forest Management Public Summary Report

Introduction

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

NSF International initially certified The Conservation Fund on July 1, 2007 and recertified the program in 2012 and in 2015, when organization was re-certified to the new SFI 2015-2019 Forest Management Standard requirements. In 2017 Audit the audit was designed to review all of the requirements in order to recertify the program and align it with another certification. This report describes the 2018 Surveillance Audit designed to review the operation of their program against a sample of SFI 2015-2019 Standard and Rules, Section 2 – Forest Management Standard requirements. The audit team also reviewed changes in the standard, changes in operations, the management review system, and efforts at continuous improvement, all of which were subject to detailed review. The audit included a review of lands in Vermont, Maine, and New York, and North Coast California properties, comprising 5 of the 41 named properties making up the program.

Program Background

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

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

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

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

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

The Conservation Fund acquired the 23,785-acre Garcia River Forest in February, 2004. In October 2006, The Conservation Fund acquired an additional 16,100 acres in two tracts – the 11,707-acre Big River Forest and the 4,204-acre Salmon Creek Forest. In December 2011, The Fund acquired the 13,537-acre Gualala River Forest. The Fund acquired the 177-acre Hardell property, adjacent to Salmon Creek, in September of 2012. The Hardell property will be managed as part of the Salmon Creek tract. In 2013, the Fund acquired the 18,120-acre Buckeye Forest in Sonoma County. The Conservation Fund and its partners developed an Integrated Resource Management Plan (IRMP) for each acquisition to guide the management and restoration plan for these properties. Partners include the State Coastal Conservancy, Wildlife Conservation Board, State Water Board, North Coast Regional Water Quality Control Board, David and Lucile Packard Foundation, Nature Conservancy, and National Fish and Wildlife

Foundation and Sonoma County Agricultural Preservation and Open Space District. These properties represent a collective capital investment of approximately \$120 million.

By acquiring these properties, the Fund and its partners hope to demonstrate that these large tracts of intensively managed coastal forest can gradually be returned to sustainable timber production and ecological vitality through the use of innovative financing and patient management by a nonprofit organization in partnership with private and public agencies and community stakeholders.

Source: North Coast Policy Digest 8/14/2015

The management objectives are summarized in this paragraph from one representative Timber Harvest Plan:

Objectives: The long-term objective is to maintain the ownership as a working forest while harvesting less than growth in order to increase timber stocks and average tree size across the landscape. TCF strives to use uneven aged regeneration methods that promote and maintain structural and compositional forest diversity and provide habitat for a variety of terrestrial and aquatic species while still allowing for sustainable timber harvest. Individual tree and group selection harvests as well as tanoak reduction treatments will be used to restore conifer site occupancy by providing growing space for new conifer age classes and vigorous established conifers. TCF will continue long-term investments in the road infrastructure in order to reduce the potential for sediment delivery.

Source: Timber Harvest Plan summary, Ironing Board THP, Big River Forest

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

The Conservation Fund’s SFI Program is managed by David Whitehouse, Forest Operations Manager.

The audit was performed by NSF in September, October, and December by an audit team headed by Tucker Watts, NSF Lead Auditor. Audit team members fulfill the qualification criteria for conducting audits contained in SFI 2015-2019 Standards and Rules, Section 9 - Procedures and Auditor Qualifications and Accreditation.

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

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

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

Audit Process

NSF initiated the audit process with a series of planning phone calls to confirm the scope of the audit, review the SFI Indicators and evidence to be used to assess conformance, verify that the Company was prepared to proceed to the Surveillance Audit, and to prepare a detailed audit plan. NSF then conducted the Surveillance Audit of conformance to the SFI 2015-2019 Standards and Rules®, Section 2. A report was prepared and final approval was done by an independent Certification Board member assigned by NSF. Follow-up or Surveillance Audits are required by SFI, Section 9. The next Surveillance Audit is scheduled for the fall of 2018.

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

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

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

Overview of Audit Findings

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

The next Surveillance Audit will be scheduled for September – October, 2019.

General Description of Evidence of Conformity

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

Objective 1 Forest Management Planning

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

Summary of Evidence: Not reviewed during 2018 Surveillance Audit.

Objective 2 Forest Health and Productivity

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

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

Objective 3 Protection and Maintenance of Water Resources

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

Summary of Evidence: Not reviewed during 2018 Surveillance Audit.

Objective 4 Conservation of Biological Diversity

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

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

Objective 5 Management of Visual Quality and Recreational Benefits

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

Summary of Evidence: Not reviewed during 2018 Surveillance Audit.

Objective 6 Protection of Special Sites

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

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

Objective 7 Efficient Use of Fiber Resources

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

Summary of Evidence: Not reviewed during 2018 Surveillance Audit.

Objective 8 Recognize and Respect Indigenous Peoples' Rights

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

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

Objective 9 Legal and Regulatory Compliance

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

Summary of Evidence: Not reviewed during 2018 Surveillance Audit.

Objective 10 Forestry Research, Science and Technology

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

Summary of Evidence: Not reviewed during 2018 Surveillance Audit.

Objective 11 Training and Education

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

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

Objective 12 Community Involvement and Landowner Outreach

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

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

Objective 13 Public Land Management Responsibilities

To participate and implement sustainable forest management on public lands.

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

Objective 14 Communications and Public Reporting

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

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

Objective 15 Management Review and Continual Improvement

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

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

Relevance of Forestry Certification

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

1. Sustainable Forestry

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

2. Forest Productivity and Health

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

3. Protection of Water Resources

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

4. Protection of Biological Diversity

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

5. Aesthetics and Recreation

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

6. Protection of Special Sites

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

7. Responsible Fiber Sourcing Practices in North America

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

8. Legal Compliance

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

9. Research

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

10. Training and Education

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

11. Community Involvement and Social Responsibility

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

12. Transparency

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

13. Continual Improvement

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

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

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

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

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



For Additional Information Contact:

Daniel Freeman
NSF Project Manager
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Ann Arbor, MI 48105
734-214-6228
dfreeman@nsf.org

David Whitehouse, Forest Operations Manager
Working Forest Fund®, The Conservation Fund
77 Vilcom Center, Suite 340
Chapel Hill, NC 27514
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Appendix 3

SFI 2015-2019, Section 2: Forest Management Standard Audit Checklist

C0144679 – The Conservation Fund

Date of audits: September 9; October 2-3; December 14, 2018

1.2 Additional Requirements

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

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

Inputs: N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Audit Notes: No Fiber Sourcing program.

Objective 1 Forest Management Planning

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

Performance Measure 1.1

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

Inputs: N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Audit Notes: Not evaluated during 2018 Surveillance Audit.

1.1.1 Forest management planning at a level appropriate to the size and scale of the operation, including:

- a. a long-term resources analysis;
b. a periodic or ongoing forest inventory;
c. a land classification system;
d. biodiversity at landscape scales;
e. soils inventory and maps, where available;
f. access to growth-and-yield modeling capabilities;
g. up-to-date maps or a geographic information system (GIS);
h. recommended sustainable harvest levels for areas available for harvest; and
i. a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation, or to address climate-induced ecosystem change).

Inputs: N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

Inputs: N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

Inputs: N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

1.1.5 Documentation of forest practices (e.g., *planting*, fertilization and thinning) consistent with assumptions in harvest plans.

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 1.2

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

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 1.3

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Objective 2 Forest Health and Productivity

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

Performance Measure 2.1

Program Participants shall promptly reforest after final harvest. Indicators:

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

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

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

Bly Hollow/Reed Plantation: Natural regeneration is used.

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

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

Audit Notes: State forest practices acts for California and Maine provide stocking levels for adequate regeneration. Guidelines are also provided in the Guidelines Digest.

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

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

Audit Notes: Exotic species are not planted at any time on The Conservation Fund's lands. Interview – David Whitehouse, Field Service Providers.

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

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

Audit Notes: North Coast California: Redwood seedlings and saplings are intentionally released via non-commercial treatments and where feasible as part of commercial harvests.

Bly Hollow/Reed Plantation: Field observations of completed harvests confirmed minimal impacts on residual trees, including regeneration.

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

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

Audit Notes: Afforestation is not conducted on the audited properties. Properties are already forested.

Performance Measure 2.2

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

2.2.1 *Minimized* chemical use required to achieve management *objectives*.

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

Audit Notes: North Coast California: "Herbicide Policy Updated 10.31.16", including this information describing the reason for the reduced use of hack-and-squirt herbicide (Imazapyr) application for controlling Tanoak: "In 2016 Measure V was passed by the Mendocino County voters, which reads: "trees taller than five (5) meters, which have been intentionally killed and left standing for longer than ninety (90) days (except those that are left for the benefit of wildlife habitat) be considered a public nuisance."

Bly Hollow/Reed Plantation: No chemical use identified.



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

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

Audit Notes: North Coast California: Very limited use of Imazapyr for invasive and hardwood control.
Bly Hollow/Reed Plantation: Treatments for invasive control only.

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

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

Audit Notes: Prescriptions and use reports indicate chemicals used for intended use and below label requirements.

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

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

Audit Notes: Chemicals used are not on prohibited list.

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

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

Audit Notes: Chemicals used are not on prohibited list.

2.2.6 Use of *integrated pest management* where feasible.

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

Audit Notes: North Coast California: Policies, pesticide application records, observations of mechanical release/Tanoak cutting.
Bly Hollow/Reed Plantation: Treatments solely for invasive control.

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

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

Audit Notes: North Coast California: Vasquez Reforestation LLC – Wilbur Ellis and David R Gallagher licensed applicators.
Witnessed license and application report.
Cranberry Lake: The Nature Conservancy – Applicators # included in application log.

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

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

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

Audit Notes: North Coast California: Visual monitoring confirm requirements met.
Reed Plantation: Interview David Adams, DASCO. Requirements are met.

Performance Measure 2.3

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

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

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

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

Bly Hollow/Reed Plantation: Foresters walk and assess the proposed harvest site as part of pre-harvest planning before developing timber harvest prescriptions. Implementation including regular, documented inspections during sale administration supports a finding of an effective program to protect soils from excessive disturbance. Depth of Water layer in GIS provides data for scheduling and matching equipment to site.

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

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

Audit Notes: North Coast Forest Conservation Program: Numerous effective water bars per BMPs were observed in all locations where they would be needed.

Bly Hollow/Reed Plantation: No erosion was observed, effective use of water bars observed and erosion control measures using debris were in place.

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

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

Audit Notes: North Coast California: Observed post-harvest conditions support strong conformance. All water bars accepted, closed units were acceptable.

Bly Hollow/Reed Plantation: Observed extensive use of logging slash spread on roads as well as piled into water bars, water bars, and minimal rutting.

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

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

Audit Notes: North Coast Forest Conservation Program: The single tree and group selection harvests to manage for Redwood and Douglas Fir are the most commonly used silvicultural treatments on the forests. Active and completed harvests reviewed showed that these prescriptions were appropriate for the sites and forests and were consistently applied well, and that vigorous trees were retained. A very low percentage of residual trees were damaged during harvests, particularly considering the steep slopes, the nature of the sprout redwood clumps being thinned, and the somewhat high residual stocking in portions of the harvested stands.

Bly Hollow/Reed Plantation: Marked stands recently harvested demonstrated conformance. The first priority of harvesting hardwood stands is the removal of poor quality trees. During site visits witnessed appropriate silviculture and removal of least-vigorous or older trees.

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

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

Audit Notes: North Coast Forest Conservation Program: California's Forest Practice rules and the North Coast Policy Digest 8/14/2015 specify the criteria. In addition, all Timber Harvest Plans written for The Conservation Fund include provisions 14CCR916.9(k) Year-Round Logging Road and 14CCR916.9(l) Extended Wet Weather Period.

Bly Hollow/Reed Plantation TCF has developed a robust policy to address rutting during timber harvests with length and depth of rutting defined. Policy 2.4 Timber Harvesting which was developed by a service provider defines criteria to protect soil productivity.

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

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

Audit Notes: Bly Hollow/Reed Plantation: All harvests are planned by foresters who are trained and experienced with sale layout. They assess each site to determine the location of the landing and the layout of main skid trails to minimize impacts. Foresters encourage loggers to maintain wide trail spacing. Many roads and yard were established during previous harvests and operations.

North Coast California: "Maintaining the road infrastructure is also critical to our ability to move through the forests for log hauling, stream restoration projects, botanical surveys and northern spotted owl surveys. A significant portion of the money we make through timber and carbon sales is re-invested in road infrastructure improvements." Careful road planning, construction, and maintenance were evident.

Performance Measure 2.4

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

2.4.1 Program to protect forests from damaging agents.

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

Audit Notes: Bly Hollow/Reed Plantation Limited herbicide use for invasive species removal, done by The Nature Conservancy under contract, to control Phragmites and knotweed. Witnessed chemical use log.

North Coast California: Foresters are aware of major pests. Control of forest stocking and removal of least-vigorous trees are the main methods used to manage forest health. Redwood forests of California are quite resilient, although some mortality of Sugar pine from drought followed by bark beetles.

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

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

Audit Notes: Active forest management and monitoring of forest conditions are used to promote healthy forests. Control of forest stocking and removal of least-vigorous trees are the main methods used to manage forest health. Inventory information and practices described in management plans, supported by interviews and observations indicate that stands which are (the most) overstocked are prioritized for treatment.

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

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

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

Audit Notes: North Coast Forest Conservation Program: "Annual update of Fire Plan submitted to CalFire and coordination with local Volunteer Fire Departments." Planning and activities are reviewed each year in a meeting that includes all of the large landowners in Mendocino County and CalFire. Scott Kelly chairs the Mendocino County Cooperative Aerial Fire Patrol, a privately-funded fire patrol used by several local landowners. TCF pays an annual fee to support this effort.

Bly Hollow/Reed Plantation: Foresters are aware of pest problems and use information from state pest programs. TCF and field service providers are well connected to state agencies and other industrial contacts for fire and pest prevention. Confirmed during interviews.



Performance Measure 2.5

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

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

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

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

Bly Hollow/Reed Plantation: N/A. No artificial regeneration.

Objective 3 **Protection and Maintenance of Water Resources**

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

Performance Measure 3.1

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

Indicators:

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

3.1.3 Monitoring of overall *best management practices* implementation.

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 3.2

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

Indicators:

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Objective 4 Conservation of Biological Diversity

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

Performance Measure 4.1

Program Participants shall conserve biological diversity. Indicators:

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

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

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

The Conservation Fund has been a leader in efforts to permanently protect key properties identified through a sophisticated analysis. All management activities on key tracts are planned with biodiversity conservation as the highest priority. Other tracts do not receive as much biodiversity planning or analysis. The program relies on its "Guidelines Digest" in general and on SFI Forest Management Program, The Conservation Fund (TCF) and Subsidiaries, TCF-SFI-04 in particular, for most aspects of biodiversity protection during management of its Working Forest Fund properties.

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

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

Audit Notes: During site visits witnessed the retention of stand-level wildlife habitat. On most occasions the trees are marked with a "W" for retention.

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

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

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

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

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

Audit Notes: North Coast California: During planning, including development of Timber Harvesting Plans and special habitat projects, planners/managers/biologists/foresters consult the California Natural Diversity Database to ensure protection of rare, threatened, and endangered species and their habitats.

Bly Hollow/Reed Plantation: Harvest plans consider and note both Lynx and Marten habitat.

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

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

Audit Notes: The Conservation Fund's efforts to manage special sites and significant species of concern are exemplary. During planning, including development of Timber Harvesting Plans and special habitat projects, planners/managers/biologists/foresters consult the California Natural Diversity Database or NatureServe database to ensure protection of rare, threatened, and endangered species and their habitats. The Conservation Fund has implemented several major in-stream habitat restoration/protection projects and other habitat enhancement and restoration projects.

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

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

Audit Notes: Non-forested wetlands are identified and mapped in the GIS. Site maps for operation visited include buffers for protection during activities.

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

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

Audit Notes: Site visits and interviews confirm foresters are aware of invasive species and implement control measures when warranted and feasible.

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

Cranberry Lake (Site visited for FSC compliance only): Adirondack Park requested to investigate closed Olde Town Dump. During review Japanese Knot Weed were found on property. The Nature Conservancy notified for chemical control of invasive species. Observed site. Witnessed chemical log.

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

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

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

Bly Hollow/Reed Plantation: The silvicultural approach described in the management plan and implemented in the harvests is based on disturbance ecology, with a combination of single-tree and group-selection harvests used to emulate single-tree death/blowdown and more substantial wind-damage.

Performance Measure 4.2

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

4.2.1 Program to protect threatened and endangered species.

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

Audit Notes: North Coast Forest Conservation Program: Identification and protection of T&E species is part of the planning approval process for forest operations. Other projects have been implemented for the restoration or enhancement of habitat.

Bly Hollow/Reed Plantation: 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 "Guideline Digest" in general and on SFI Forest Management Program, The Conservation Fund (TCF) and Subsidiaries, TCF-SFI-04 in particular, for most aspects of biodiversity protection during management of its Working Forest Fund properties.

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

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

Audit Notes: North Coast Forest Conservation: During planning, including development of Timber Harvesting Plans and special habitat projects, planners/managers/biologists/foresters consult the California Natural Diversity Database to ensure protection of rare, threatened, and endangered species and their habitats.

Bly Hollow/Reed Plantation: During acquisition the NatureServe database and other sources are used to verify the occurrence of FECV on the property. Conservation easement for the property provided for additional review.

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

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

Audit Notes: North Coast Forest Conservation Program: Interviews and documents reviewed, including the North Coast Policy Digest, indicated that all old-growth forests and legacy tress are protected. Major portions of the forests are being managed to mimic late successional stage forests or are being left uncut to allow stands to develop into older growth stages on their own.

Bly Hollow/Reed Plantation: Property historically has been in forest management. No old-growth forests exist on the property. Witnessed during site visits.

Performance Measure 4.3

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

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

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

Audit Notes: The Conservation Fund conducts comprehensive on-site surveys to select ecologically important sites for protection.

North Coast Forest Conservation Program: TCF contracts with botanists to conduct botanical surveys, and conducts other surveys using contractors and/or trained employees. TCF also works with partner organizations to obtain data and scientific information that supports efforts to conserve biodiversity.

Reed Plantation: Maine Natural Areas Program surveyed property during 2005-2007. Although prior to TCF ownership, this information is used for identifying and protecting ecologically important sites.

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

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

Audit Notes: Witnessed mapping in GIS database for properties visited.

Performance Measure 4.4

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

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

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

Audit Notes: North Coast California: During planning, including development of THPs and special habitat projects, planners/managers/biologists/foresters consult the California Natural Diversity Database to ensure protection of rare, threatened, and endangered species and their habitats.

Bly Hollow/Reed Plantation: TCF staff and consulting foresters use data from the Natural Heritage Programs to determine presence of FECVs and RTE species and communities.

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

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

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

Bly Hollow/Reed Plantation: In partnership with state agencies, conservation groups, and others, TCF has implemented an array of monitoring and formal research efforts designed to learn, over time, the best ways to restore and/ or manage for biodiversity concurrent with other social and economic objectives on these lands.



Objective 5 Management of Visual Quality and Recreational Benefits

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

Performance Measure 5.1

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

5.1.1 Program to address visual quality management.

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 5.2

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 5.3

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 5.4

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.



Objective 6 Protection of Special Sites

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

Performance Measure 6.1

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

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

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

Audit Notes: North Coast California: Timber Harvest Plans include archeological reviews.
Cultural features maps are on file for Reed Plantation and Bly Hollow.

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

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

Audit Notes: Conformance was demonstrated for all sites audited. Maps and plans depict all special sites, and often the organization hires specialists to augment information normally available in exiting state-managed databases of ecological, cultural/historic sites.
North Coast California: Property-wide botanical surveys have been completed for all parcels.



Objective 7 Efficient Use of Fiber Resources

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

Performance Measure 7.1

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

7.1.1 *Program* or monitoring system to ensure efficient utilization, which may include provisions to ensure:

- a. management of harvest residue (e.g., slash, limbs, tops) considers economic, social and environmental factors (e.g., organic and nutrient value to future forests and the potential of increased fuels build-up) and other utilization needs;
- b. training or incentives to encourage loggers to enhance utilization;
- c. exploration of markets for underutilized species and low-grade wood and alternative markets (e.g., bioenergy markets); or
- d. periodic inspections and reports noting utilization and product separation.

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Objective 8 Recognize and Respect *Indigenous Peoples'* Rights

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

Performance Measure 8.1

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

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

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

Audit Notes: Sustainable Forestry Commitment contains a provision to recognize and respect Indigenous Peoples' rights.

Performance Measure 8.2

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

8.2.1 *Program* that includes communicating with affected *Indigenous Peoples* to enable *Program Participants* to:

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

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

Audit Notes:

Performance Measure 8.3

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

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

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

Audit Notes: The forest manager has sent letters to communicate with communities of indigenous people in their area to identify sites of current or traditional cultural, archeological, ecological, economic or religious significance. Witnessed letters and responses for properties visited. Interview with David Whitehouse confirmed there are no such tribes near any of the WFF properties.

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

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

Audit Notes: Public Inquiries & Official Complaint Procedure (TCF-SFI-12) has been established for receiving and responding to complaints. No feedback or response has been received from indigenous peoples on TCF properties.

Objective 9 Legal and Regulatory Compliance

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

Performance Measure 9.1

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

9.1.1 Access to relevant laws and regulations in appropriate locations.

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 9.2

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Objective 10 Forestry Research, Science and Technology

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

Performance Measure 10.1

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 10.2

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

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

Performance Measure 10.3

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

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.

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

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

Audit Notes: Not evaluated during 2018 Surveillance Audit.



Objective 11 Training and Education

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

Performance Measure 11.1

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

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

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

Audit Notes: Sustainable Forestry Commitment sent to all staff and contractors on 7/25/18 by Scott Tison. Witnessed memo and distribution.

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

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

Audit Notes: The SFI Forest Management Program designates responsibilities (1.1,1,a). Staff Training Matrix (TCF-SFI-10) indicate training by position.

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

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

Audit Notes: Listing of employee training witnessed in the following:
• Working Forest Fund Staff Training and Public Service 2018
• North Coast Forest Conservation Initiative Programmatic Activities 2018

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

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

Audit Notes: Required contractor training is defined in Contractor Training Matrix (TCF-SFI-10). Logging contractors for sites visited have completed state logger training programs. Chemical applicators are licensed applicators for the states in which they work. Field service providers are registered foresters. Witnessed CEUs and certificates.

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

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

Audit Notes: Witnessed in Harvest and Delivery Contracts for sites visited.

Performance Measure 11.2

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

Indicators:

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

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

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

Audit Notes: The Conservation Fund currently participates in SFI Implementation Committees in Georgia, California and New Hampshire, with either TCF staff or consultants attending meetings. SIC Committees work to provide logger training workshops with the required content.

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

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

Audit Notes: Verified CEU is required for logger training in Georgia, California and New Hampshire.

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

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

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

Audit Notes: Logger certification programs do not exist in California, New Hampshire, or Georgia.

Objective 12 Community Involvement and Landowner Outreach

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

Performance Measure 12.1

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

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

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

Audit Notes: Witnessed minutes and financial support of SIC in CA, GA, and NH. CA does not charge annual dues, but raises money as needed.

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

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

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

Audit Notes: Website of The Conservation Fund provides information to landowners and documentation of their programs. Witnessed brochures and website of management guidance.

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

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

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

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

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

Witnessed operation of conservation easement on Reed Plantation. Interviewed Jake Metzler, Director of Forestland Conservation, Forest Society of Maine. Discussed process for development of conservation easement for other properties.

Performance Measure 12.2

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

12.2.1 Periodic educational opportunities promoting *sustainable forestry*, such as

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

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

Audit Notes: The Conservation Fund provides an exceptional level of public education and involvement related to sustainable forest management. Listing of activities witnessed in the following:

- Working Forest Fund Staff Training and Public Service 2018
- North Coast Forest Conservation Initiative Programmatic Activities 2018

Performance Measure 12.3

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

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

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

Audit Notes: Witnessed minutes and financial support of SIC in CA, GA, and NH. CA does not charge annual dues, but raises money as needed.

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

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

Audit Notes: Witnessed Complaint Log of calls received and actions taken. When concerns are voiced, The Conservation Fund responds rapidly to the concern with communication with the caller and other parties. All complaints resolved. Witnessed annual submission of SIC Annual Progress Report to SFI, Inc. for GA and NH.



Objective 13 Public Land Management Responsibilities

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

Performance Measure 13.1

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

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

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

Audit Notes:

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

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

Audit Notes:

Objective 14 Communications and Public Reporting

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

Performance Measure 14.1

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

- 14.1.1 The summary audit report submitted by the *Program Participant* (one copy must be in English), shall include, at a minimum,
- a description of the audit process, *objectives* and scope;
 - a description of substitute *indicators*, if any, used in the audit and a rationale for each;
 - the name of *Program Participant* that was audited, including its *SFI* representative;
 - a general description of the *Program Participant's* forestland included in the audit;
 - the name of the *certification body* and *lead auditor* (names of the *audit team* members, including *technical experts* may be included at the discretion of the *audit team* and *Program Participant*);
 - the dates the audit was conducted and completed;
 - a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and
 - the certification decision.

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

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

Audit Notes: Witnessed Surveillance Audit Report of 12/16 and Re-certification Audit Report of 11/17 on SFI website.

Performance Measure 14.2

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

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

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

Audit Notes: SFI Annual Progress Report Survey submitted on 1/22/18.

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

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

Audit Notes: Witnessed reports and documents for the completion of report. No issues identified.

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

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

Audit Notes: The Forest Operations Manager maintains past reports electronically. Witnessed reports.

Objective 15 Management Review and Continual Improvement

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

Performance Measure 15.1

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

Indicators:

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

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

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

- The Monitoring Checklist and State BMP Inspection Reports;
- Any Environmental Incidents and corrective action results;
- External audit and corrective action results (i.e. third party SFI audits);
- Staff and contracting training accomplishments documented in the Training Matrices; and
- Suggested changes to policies or procedures.

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

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

By implementing the above Programs, Plans, Systems and Processes, TCF will continually improve its performance and achieve its objective of broadening the practice of sustainable forest management, consistent with the SFI Standard and requirements.

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

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

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

- Quarterly Reports
- Annual Report
- Annual Budget
- Annual Management Plan

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

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

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

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

Audit Notes: Reviewed the agenda and minutes for the Annual SFI Management Review that was held on August 13, 2018. Annual SFI Management Review Agenda is included in the SFI Document Directory (TCF-SFI-16)

(End SFI Forest Management Checklist)

Site Notes

Client: The Conservation Fund

Engagement: 2018 Annual Surveillance

Date: 6 September 2018 - Cowee (Bly Hollow)	
FMU / location / sites visited	Activities / notes
Audit Opening Meeting FME Office	Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection for Bly Hollow, LLC portion of audit.
RT Again	<p>284 Acres – Marked Shelterwood. Harvesting by A Johnson Company. Witnessed Harvest and Delivery Contract, Contractor Conference Checklist, and Timber Sale Administration Inspection Report. Findings corrected and closed with no issues. 3 product sorts. Hunting lease. Lessees notified prior to harvesting activity.</p> <p>Wooden bridges used for crossings. Smooth skid trails with turnouts, water bars, and hay bales to stabilize and control water. Brook crossing includes turnouts, water bars, and hay bales to stabilize area around brook crossing. SMZ flagged. Turnouts have dirt at end for catching sediment. Well-stocked stand. Goal is to release younger stems to create diversity of species and age classes. Minimal skinning of residual stand. Large trees cut to create seed bed. Wildlife trees marked with “W” to retain nest, and cavity trees and trees with bear marks. Buffer along brook well marked. No entrance. If trees are marked for cut, they must be cabled form the buffer. Shag bark hickory retained for Northern Long Eared Bats. Slash along main skid trail to protect brook. Work with hunting clubs to maintain water bars. Closed area and debris used to protect vegetation. Old wall saved and protected. If damaged will be re-established. Hunting clubs and neighbors have been notified. Property has 3 hunting clubs with camp sites.</p>
Historical site – Shays Settlement Project	MOU with Cambridge Central School for 200 Acre archeology site. Steve Butz is high school teacher working with project. Each summer students spend 2 weeks at a field camp on site. 12 cellar holes have been identified. Location and boundary of barn or fort have been defined and preserved. No habitation since late 1700’s. Historical place where Daniel Slay hid for treason for fighting US taxes after revolution. State will purchase and continue and maintain area when sold. Area will be listed as a State Historic Preservation and on the National Register as a National Historic site. Book has been written and website at Shays Settlement .com. Area documented in GIS. 1 hunting club with camp site have been notified.
On The Way to Shay’s	7 Acre Clearcut with retention marked. Brook buffered. Protection of Butternut Trees. All 1” brush has been cut to ground to protect regeneration from browsing. Deck converted to food plot. Harvesting operation matched to conditions. 2 small cable skidders, hand cut, and 1 truck. 2 sorts – logs, firewood. Chuck Towslee, Towslee Logging, current with required logger training. Witnessed Harvest and Delivery Contract, Contractor Conference Checklist, Timber Sale Administration Inspection Report, and Monitoring Checklist. Findings corrected and closed with no issues.
	Beaver damage causing road to flood and impact Shay’s Settlement Project. Beavers have been trapped and road repaired. Water diverted around cellar site in Shay’s Settlement.
Pluggin’ Away	156 Acre Improvement Thinning. Harvesting by James A. Winn A Corporation. Witnessed Harvest and Delivery Contract, Contractor Conference Checklist, and Timber Sale Administration Inspection Report. Findings corrected and closed with no issues. Remove understory and release crop trees. Water bars and natural vegetation used to stabilize skid trails and roads. 2 crossings have been remediated. Panels for crossings have been removed.

	Straw used for stabilization. No issues. Minor skinning of residual stand. Chestnut Oak buffered. Walls on site protect from damage during harvesting.
Atwater Tract	70 Acre Marked Thinning. Logging job inactive due to wet ground conditions. Brook crossing active. Logs on side to stabilize. No issues. Native vegetation used to stabilize around brook. Minimal skinning. Steep rocky soil. Atwater Cemetery protected by red reflectors and flagged. Documented in GIS.
Closing Meeting, New York	Review preliminary findings for New York portion of audit (potential non-conformities and observations) and discuss next steps.
Date: 2 October 2018 - California properties(Big River, Salmon Creek)	
FMU / location / sites visited	Activities / notes
Opening Meeting, California Caspar Field Office	Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection for California portion of audit.
Site 11 (Big River FMU): Two Log Creek Restoration	2013 LWD stream restoration project with neighboring owner, Mendocino Redwood Company (MRC). Logs placed in stream with rubber-tired skidder to promote formation of pools for a 2.5-mile length of the creek; downstream of each log, pools had been created in the stream substrate. Some logs were intentionally wedged, while others placed to allow for movement with the streamflow. Each log is tagged, and the GPS location, species, size, and movement of each log were monitored by FME annually for the first few years. The project was funded by grants from the California Dept. of Fish & Wildlife (CADFW) and Trout Unlimited to benefit the Coho salmon and steelhead trout. Two Log Creek flows into Big River, which contains salmonid populations of Coho salmon (<i>Oncorhynchus kisutch</i>), chinook salmon (<i>O. tshawytscha</i>), and steelhead trout (<i>O. mykiss</i>)—all listed as endangered or threatened under the federal Endangered Species Act (ESA).
Site 12 (Big River FMU): Two Log Creek Bridge	56-foot bridge crossing creek constructed of railroad bed with untreated wood. Bridge is owned by MRC, and FME has an easement to allow for passage to access property. Well-constructed and maintained. No sign of erosion.
Site 13 (Big River FMU): Ironing Board THP, Tanoak Control	10-acre tanoak removal. Trees had been felled and stumps sprayed with imazapyr. Spraying occurred on 13 September 2018, and signage remained onsite indicating the area had been treated as observed by auditors. The operation was a 2-person crew with one felling the trees with a chainsaw and the other spraying. Several snags were observed, which had been designated for retention. The primary goal of the treatment was to release fir, but the Forest Practices Act (FPA) requires the ratio of hardwood to softwood remain constant post-harvest. There was discussion about the potential fuel issue of leaving the tanoak on the forest floor.
Site 14 (Big River FMU): Ironing Board THP, Selection Harvest	Selection harvest included partial removal of tanoak (as opposed to complete removal at Site 13). Treatment focused on removing hardwoods competing with conifers and reducing the amount of hardwoods relative to that of conifers. Merchantable logs had been cable yarded, and corridors were evident. No residual damage noted. Tanoak stumps were treated with herbicide. There was discussion about the benefits to wildlife of the tanoak slash, as well as how chemical treatment is more effective and economical than other means of potentially controlling tanoak.
Site 15 (Big River FMU): Ironing Board THP, Harvest Road	Access road for THP developed in 2017 for harvesting. The ridgetop road contains rolling dips, water bars, and wide turnouts. Substrate is dirt (no gravel) and too soft to drive on. Minor erosion observed.
Site 16 (Big River FMU): Ironing Board THP, Selective Cut	Completed commercial thin. Steepness of slope necessitated use of yarding system. Corridors observed; residual trees showed minimal debarking. Goal of harvest was to improve forest health and reduce competition among species by removing white fir, defected, and diseased trees. All redwood was retained. The slope had been planted by the previous landowner, and

	FME is in the process of converting the stand from an even to an uneven age. This process will take several entries a number of years. There was discussion about management needed to move the stand to an uneven-age structure.
Site 17 (Salmon Creek FMU): Relic Clearcut	30-year old clearcut from previous landowner. Site was replanted in 2017 with redwood and D-fir; survival has been moderate. The regeneration is informally monitored, as stocking levels are not required by the state for planting a on old opening like this. The site has a southerly exposure with little water, so the trees had been planted in the shade of brush. FME plants approximately 60 acres/year of similar open areas. Planting stock for FME is produced from seed collected on the FMU; the Jackson State Demonstration Forest nursery grows the seeds and provides FME with containerized stock for planting.
Site 18 (Salmon Creek FMU): Salmon Creek Road	On the main haul road, auditors observed culverted crossing which had been replaced on a deeply-incised stream. The incision occurred several years ago during heavy rains. The original metal culvert was replaced with a double-walled 3-foot diameter black plastic culvert. Outside of culvert is corrugated; inside is smooth. Culvert was installed correctly with the pitch aligned with the streambed angle. Large piles of metal culverts have accumulated long the roadside; as markets allow, the metal will be removed for salvage. The Salmon Creek watershed had recently had 5 stream crossings removed and sediment control implemented; the local group, Friends of Salmon Creek, was supportive.
Site 19 (Salmon Creek FMU): Dump Site	FMU is gated to control access. At one gate, 3 junk cars had been dumped along with numerous tires. Reports from law enforcement were attached to the vehicles. The process for dealing with illegal activity involves notifying law enforcement. There are 2 security officers that are employed by FME; they will work with law enforcement on any issues that come up, including dump sites like this one. Employees are knowledgeable of the process for handling dumping and other illegal activities and work well with security employees and law enforcement.
Site 20 (Salmon Creek FMU): Carbon Plot	1/10-acre fixed point carbon plot next to Salmon Creek. Permanent plots have been established for development of carbon credits. The center of each plot is identified by a permanent tag (observed in field by auditors) with GIS location, date, and identification number. Inventory is conducted on a 10-year cycle. 1,500 to 2,000 plots have been established across the FME properties on the North Coast. During carbon inventories, woody material is counted in three consecutive rings around the plot center in accordance with the California Air Resources Board (CARB) protocol.
Site 21 (Salmon Creek FMU): WLPZ area	Second growth redwood forest stand in WLPZ area along stream. Overstory comprised of very large redwood. Forest floor contains several large stumps from the removal of the primary forest during historic logging; a nearby old railroad bed, now overgrown, had been used historically to log the stand. This WLPZ is protected from any harvest by FME.
Site 22 (Salmon Creek FMU): Pygmy Forest	4-acre example of pygmy forest; the ecotype is designated as HCV by FME. Tree growth is stunted due to poor site and growing conditions; soil is rocky and thin. Area is protected from active management.
Date: 3 October 2018 - California properties (Garcia)	
FMU / location / sites visited	Activities / notes
Site 23 (Garcia FMU): Fish Rock THP, Group Selection Active Operation	Witnessed and discussed active timber harvesting operation and guidelines along Fish Rock Road. In NSO area, group selection areas are no more than 1-acre in size. Twenty percent of the total harvest area can be up to 2.5 acres in size with 200 feet between each group opening. Single tree selection along road in unit. Tanoak is removed to promote conifer regeneration. Group openings will be planted with D-fir and redwood containerized seedlings. Slash and debris used to stabilize slopes, retain moisture for regeneration, protect against deer browsing of seedlings, and reduce establishment of grasses. Interviewed supervisor of active operation, who is a faller; he is an employee of the LTO (not a contractor, as is typically the case). Crew is well trained and wore appropriate PPE.

Site 24 (Garcia FMU): Fish Rock THP, Group Selection Active Operation, Rare Plant Protected Area	Approximately 25-foot in diameter protected area flagged by RPF for the rare white flowered rein orchid (<i>Piperia candida</i>). No harvesting is to occur in the protection area, which occurs along the haul road. The plant is designated as rare by the California Native Plant Society.
Site 25 (Garcia FMU): Fish Rock THP, Group Selection Active Operation, WLPZ Area	Class 2 WLPZ buffered with flagging. Some trees marked inside zone. Per state law, 50% of canopy must be retained for harvesting in a Class 2 WLPZ. Trees must be directionally felled away from creek. The goal is to retain adequate shading and not alter of hydrology.
Site 26 (Gualala River FMU): New Water Crossing	Along Fish Creek Road, FME is in final stages of improving a water crossing. The crossing occurs at the junction of a Class 2 stream and Class 3 stream. For the Class 2 stream, a ditch on the hillside of the road was constructed, draining to a galvanized metal culvert. A downspout will be installed at the outlet of the culvert to minimize erosion in the stream. Steep banks below the road and culvert have been armored with rock. For the Class 3 stream, a low water crossing was constructed with larger substrate below road level capped with gravel. Road in the vicinity is rocked with various sizes of rock and gravel. No evidence of erosion.
Site 27 (Gualala River FMU): Pond	Small spring-fed pond located roadside. Biologist who was conducting surveys for FME stated that the pond is ideal habitat for the California red-legged frog (<i>Rana draytonii</i>), although the species has not been seen there. The species is listed as threatened under the federal ESA. Water from the spring feeding the pond is diverted for drafting as needed.
Closing Meeting, California	Review preliminary findings for California portion of audit (potential non-conformities and observations) and discuss next steps.
Date: 14 December 2018 – Reed Plantation	
FMU / location / sites visited	Activities / notes
Opening Meeting, Maine Office – Prentiss & Carlisle	Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection for Maine portion of audit.
Site 28: FME Office	Discussed organization and operation of Reed Plantation <ul style="list-style-type: none"> • Existing supply agreement for Spruce/Fir and AAC Identification and protection of special sites, HCVF, T&E species • Reviewed maps and GIS • Discussed public recreation use of area • Monitor for invasive species. Log and applicator license witnessed. • Operation of conservation easement • Witnessed contracts for harvesting, and road maintenance • Markets • Communication with contractors • Installation of fish passage culverts • Planning for Spruce Budworm
Site 29: Timber Sale	125 Acres Shelterwood harvest. Equipment is on site to plow roads for winter harvest. Plan includes wildlife considerations, HCVF (N/A), and LUPC Zones for Prouty Brook. Witnessed flagging of SMZ with no entrance. Witnessed Pre-Harvest Conference Checklist for 7 tracts. Skid trails parallel to roads for aesthetics. Buffer around adjacent houses. Debris will be scattered on skid trails.
Closing Meeting, Maine	Review preliminary findings for Maine portion of audit (potential non-conformities and observations) and discuss next steps.



Appendix 4

NSF Audit Attendance Sheet

Company Name The Conservation Fund

Location Cranberry Lake (FSC); Cowee (SFI); Reed (SFI/FSC); Big River (SFI/FSC);
Salmon Creek (SFI/FSC); Garcia (SFI/FSC); Gualala (SFI/FSC)

Type of Audit Surveillance Audit for SFI/FSC

Opening Meeting Date September 4, 2018 Closing Meeting Date December 14, 2018

Name	Position	Attended Opening Meeting?	Attended Closing Meeting?
David Whitehouse	Forest Operations Manager, The Conservation Fund	y	y
Tucker Watts	NSF Lead Auditor	y	y
Sally Manikian	Vermont/New Hampshire State Representative		
Bob Bradbury	LandVest Timberland Regional Manager		
David Dow	Prentiss & Carlisle, Chief Forester		
Bob Chandler	Prentiss & Carlisle, Forester		
Jake Metzler	Forest Society of Maine (Manages Conservation Easement)		
Scott Tison	Real Estate Legal Manager		
Holly Newberger	Program Coordinator		
Trevor Cutsinger	WFF Business Manager		
Scott Kelly	Timberland Manager		
Stefan Bergman	SCS Lead Auditor		
Tom Gilman	F & W, Regional Manager		
P J Kavanaugh	F & W, Forester		