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FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY ANNUAL AUDIT REPORT

V1-0

The Conservation Fund’s North Coast Forest Conservation Program

Mendocino County, California

Certificate Number: SCS-FM/COC-00102N

CERTIFIED	EXPIRATION
12/21/07	12/21/12

DATE OF FIELD AUDIT
09/27-28/2010
DATE OF LAST UPDATE
12/08/2010

Organization of the Report

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

FOREWARD

This report covers the 2nd annual audit of The Conservation Fund – North Coast Forest Conservation Program pursuant to the FSC guidelines for annual audits as well as the terms of the forest management certificate awarded in 2007 (SCS-FM/COC-00102N). All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing compliance with the requirements and standards of certification. A public summary of the initial evaluation is available on the SCS website www.scs-certified.com.

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

- A focused assessment of the status of any outstanding conditions or corrective action requests and observations
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior audit
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

At the time of the 2010 annual audit, there were no open Corrective Action Requests' however there were 5 open Observations, the status of The Conservation Fund – North Coast Forest Conservation Program's response to which was a major focus of the annual audit (see discussion in section 5.1 for a listing of those OBSs and their disposition as a result of this annual audit).

All items marked with an asterisk (*) are not required for FMUs that qualify as single SLIMFs.

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Section A – Public Summary

1.0 General Information

As The Conservation Fund (TCF) – North Coast Forest Conservation Program properties are located in the North Coast region of California, management of the forests is subject to a host of local, state and federal regulations. The principal regulations of greatest relevance to forest managers in the North Coast region are associated with the following statutes:

Pertinent Regulations at the Federal Level:

Endangered Species Act

Clean Water Act (Section 404 - wetland protection & Section 303d - impaired water bodies)

Occupational Safety and Health Act

National Historic Preservation Act

Archaeological and Historic Preservation Act

Americans with Disabilities Act

U.S. ratified treaties, including CITES

Pertinent Regulations at State and Local Level:

Z'Berg-Nejedly Forest Practice Act

California Environmental Quality Act

California Endangered Species Act and Fish & Game Code

Natural Communities Conservation Planning Act

Porter-Cologne Water Quality Act

California Coastal Act

The Conservation Fund is a national organization, with land holdings throughout the United States. The North Coast forests are the only properties owned by TCF in the Western states that support timber harvesting. TCF's other forested properties either: a) are not managed for timber, b) are set to be sold in the near future, or c) are in the process of becoming FSC-certified under a group certificate. Therefore only the Mendocino County FMUs are being included in the scope of this certification evaluation.

The economic downturn has had a significant impact on the harvest rates on the TCF forest holdings. Harvest rates have been considerably below the projected rates over the past three years. To help offset this TCF sought to market carbon credits for long-term carbon sequestration. The revenues generated from the sale of carbon offset credits have been an important economic source for Conservation Fund – North Coast Forest Conservation Program.

1.1 Annual Audit Team

For this annual surveillance audit, the team was comprised of Dr. Walter R. Mark, leading the FSC audit, and Mike Ferrucci, who lead the SFI assessment. Mike Ferrucci participated in the

2007 full evaluation as well as the 2008 annual surveillance audit, thus providing good continuity.

Dr. Walter R. Mark: FSC Lead Auditor and SFI Team Member

Dr. Mark is a professor emeritus of forestry at California Polytechnic State University, San Luis Obispo and former Director of Swanton Pacific Ranch, the University’s FSC Certified school forest. Dr. Mark specializes in forest health and silviculture. Dr. Mark is a consultant for SCS and is responsible for the audit. Dr. Mark is a registered professional forester in California (RPF No. 1250) with over 35 years of forestry experience in public and private forestry and higher education sectors. He has served as audit team member and leader for several certification, recertification, scoping, and annual audits over the past several years.

Mike Ferrucci, Master of Forestry - SFI Team Leader Scoping and Full Assessments, FSC Team Member

Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 25 years. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. Mr. Ferrucci’s primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies. Mr. Ferrucci has participated in forest management assessments in 27 states, and has conducted joint FSC-SFI Certification Assessments on over 14 million acres of forestland in the United States. For this project, Mr. Ferrucci functioned as an employee of NSF.

1.2 Total time spent on evaluation

A. Number of days spent on-site assessing the applicant:	2.0
B. Number of auditors participating in on-site evaluation:	2.0
C. Additional days spent on stakeholder consultation:	0.5
D. Total number of person days used in evaluation:	6.5
(Line D = (Total number of days in Line A x Total number of auditors from Line B) + additional days from Line C.	

1.3 Standards Employed

Box 1.3.1. – Applicable FSC-Accredited Standards		
Title	Version	Date of Finalization

FSC US Forest Management Standard	V1-0	08 – July – 2010
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Forest Conservation Program homepage (www.scs-certified.com/forestry). Standards are also available, upon request, from Scientific Certification Systems (www.scs-certified.com).		

2.0 Annual Audit Dates and Activities

Prior to the actual on site audit, numerous activities and extensive correspondence took place. The selection of the team by SCS took place in July 2010. Part of the early discussion for the audit evolved around what FSC standards would be utilized for the audit. TCF, after much consideration and dialogue with SCS, decided on September 17, 2010 to utilize the new US Standard, approved in July 2010. As a result this is the standard that was employed on the audit and some of the Observations made in this audit reflect the changes in the standards.

2.1 Annual Audit Itinerary and Activities

Date and Participants	FMU/Location/ sites visited*	Activities/ notes
Monday September 27, 2010 Walter Mark, Mike Ferrucci – Audit Team Evan Smith, Jenny Griffin, Holly Newberger, Jordan Golinkoff, Margery Hoppner - all from TCF	Opening Meeting at TCF Offices in Caspar, CA	Introductions, scope of audit, Principles covered, Observations, review of schedule, Setting of field itinerary
9/27 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish – all from TCF Lee Susan and Eric Hontou – Summit Forestry	Site 1 Big River Forest, Wheel Gulch Crossing on Big River Road	Revisited culverts seen 2009 SA during construction; working well
9/27 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff – all from TCF Lee Susan and Eric Hontou – Summit Forestry	Site 2 Big River Forest, Wheel Gulch THP, Active portion of yarder harvest interviewed Mark Robertson, Logging Supervisor, LTO, Philbrick Logging (California ProLogger Company, LTO training; spill kits; first aid kits)	Interviewed Mark Robertson, Logging Supervisor, LTO, Philbrick Logging (LTO training and certification; spill kits; first aid kits; harvest plan copy on site; load ticket check)
9/27 Walter Mark, Mike Ferrucci	Site 3 Big River Forest, Wheel Gulch THP, Completed portion of	Reviewed areas of tractor logging and skid trail location,

<p>Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff – all from TCF Lee Susan and Eric Hontou – Summit Forestry</p>	<p>tractor harvest</p>	<p>closure, and residual stand damage.</p>
<p>9/27 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff – all from TCF Lee Susan and Eric Hontou – Summit Forestry</p>	<p>Site 4 Big River Forest, Wheel Gulch THP, Temporary Steel Bridge, Little North Fork of the Big River</p>	<p>Reviewed action planned to remove and rehabilitate temporary bridge site following end of THP. Also discussed potential LWD project proposed for funding by DFG</p>
<p>9/27 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff – all from TCF Lee Susan and Eric Hontou – Summit Forestry</p>	<p>Site 5 Big River Forest, Picolotti pending THP: proposed 448 acres mostly for selection for 2011</p>	<p>Discussion of THP planning and approval process, reviewed marking for single tree selection in stand previously logged with shelterwood removal cut</p>
<p>9/27 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff – all from TCF Lee Susan and Eric Hontou – Summit Forestry</p>	<p>Site 6 Big River Forest, Laguna Pass THP: completed day of audit</p>	<p>Observed final load of logs leaving site; reviewed completed section of flood plain harvest on Site I land, skid trail treatment, and issues in complying with regulations requiring leaving the 13 largest trees per acre</p>
<p>9/27 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff – all from TCF Lee Susan and Eric Hontou – Summit Forestry</p>	<p>Site 7 Big River Forest, Laguna Pass THP: Road Decommissioning Project appurtenant to Laguna Pass THP</p>	<p>Walked decommissioned road section to look at removal of several high-risk culverts, outsloped some parts of roads, but mostly used rolling dips</p>
<p>9/27 Walter Mark, Mike Ferrucci</p>	<p>Site 8 Big River Forest, Carbon Plot monumentation</p>	<p>Looked at the monumentation associated with carbon</p>

<p>Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff – all from TCF Lee Susan and Eric Hontou – Summit Forestry</p>		<p>sequestration monitoring associated with the sale of carbon credits</p>
<p>9/27 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Holly Newberger, Scott Kelley, Madison Thomson, Jordan Golinkoff – all from TCF</p>	<p>Working dinner</p>	
<p><u>Tuesday September 28, 2010</u> Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff, Scott Kelley, Madison Thomson – all from TCF Karyn Gear – Coastal Conservancy Jen Carah and Jason Pelletier - TNC</p>	<p>Site 1 Garcia River Forest, Jack (Wild) Fire 2008 Graphite Road</p>	<p>Travelled through and discussed 740 acre ground fire, no salvage, have since developed a fire plan</p>
<p>9/28 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff, Scott Kelley, Madison Thomson – all from TCF Karyn Gear – Coastal Conservancy Jen Carah and Jason Pelletier – TNC</p>	<p>Site 3 Garcia River Forest, Garcia River Bridge</p>	<p>Replacement of old bridge where abutments had rotted out using three 90-foot rail cars, two side-by-side, third cut in half and side-by-side</p>
<p>9/28 Walter Mark, Mike Ferrucci</p>	<p>Site 4 Garcia River Forest, Blue Water Hole Road</p>	<p>Examined storm-proofing of a mid-slope road designed to</p>

<p>Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff, Scott Kelley, Madison Thomson – all from TCF Karyn Gear – Coastal Conservancy Jen Carah and Jason Pelletier – TNC</p>		<p>withstand 100-year flood event; actions included smoothing berms, outsloping as needed, replacing culverts, and rolling dips; Project managed as a Supplemental Environmental Project, funded by Pulte Homes as environmental mitigation Plan to implement instream project next year to improve habitat now that sediment reduction is accomplished on road</p>
<p>9/28 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff, Scott Kelley, Madison Thomson – all from TCF Jen Carah – TNC</p>	<p>Site 5: Garcia River Forest, Inman Creek Large Wood Restoration Project, presented by Jen Carah - TNC</p>	<p>Large woody debris (LWD) in-stream restoration by placing large logs in the stream, mostly unanchored but wedged opportunistically; monitored 1 year later – most pieces moved but still in the stream, some moved out to the main stem, many good quality, multi-log log-jams formed; habitat quality for fish (assessed pools, riffles) improved</p>
<p>9/28 Walter Mark, Mike Ferrucci Audit Team Evan Smith, Jenny Griffin, Lizzy Gish, Jordan Golinkoff, Scott Kelley, Madison Thomson – all from TCF</p>	<p>Closing Meeting at Garcia River Forest, Graphite Road Gate</p>	<p>Presented preliminary findings of the results of the audit</p>

3.0 Changes in Management Practices

No significant changes have occurred in the management practices of The Conservation Fund, North Coast Forest Conservation Program.

4.0 Annual Summary of pesticide and other chemical use

Commercial name of pesticide/ herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year (ha or ac)	Reason for use
Imazapyr	Imazapyr	Data not available	275	Reduced competition from tanoak
Accord	Glyphosate	Data not available	182	Reduce competition
Tryclopor	Tryclopor	Data not available	182	Reduce competition

5.0 Open Corrective Action Requests (CARs)

There were no open corrective action requests at the time of the 2010 Annual Surveillance Audit.

5.1 Open Observations (OBSs)

There were five open Observations at the time of the 2010 Annual Surveillance Audit.

Background/Justification: During the 2009 surveillance audit, the audit team determined that TCF did not have a comprehensive plan regarding hazardous spills. At the time of the audit their independent contractor documents contained a section on spills; the wording was very vague; “take appropriate action to mitigate”.	
OBS 2009.1	TCF should develop a fuel spill policy that is clear and in conformance with FSC principles and local laws. Spill kits should also be available on site in case of a spill.
Reference	FSC Pacific Coast Standard Indicators 6.7b
FME response and SCS comment	The contract language has been modified to “In the event of a spill or release of oil or hazardous materials on the Contract Area, CONTRACTOR shall promptly comply with all federal, state, and local spill notification and response requirements, including, but not limited to, all federal and state health and safety requirements. The CONTRACTOR shall at a minimum: (1) prevent further spilling or release; (2) take appropriate corrective actions to mitigate the spill; and (3) notify COMPANY. Consultant (Contractor sic) shall maintain a 50 gallon spill kit on the Property with heavy equipment and/or with any oil of hazardous materials.” In addition TCF has purchased a “loaner” spill kit for use by

	any contractor who does not have or cannot afford to purchase such a kit. Spill kits were checked on site of operations during the audit and contractors had the required spill kits present.
Disposition of OBS	This observation is closed.

Background/Justification: During the 2009 annual surveillance audit it was determined that TCF currently used a 20 year rolling time period to determine average harvest rates. The Pacific Coast Standard speaks to rolling periods of no more than 10 years for computing average annual harvest levels. Were TCF's harvest levels near to annual growth levels (thus making the calculation of harvest versus growth more than a mere formality), this would be a CAR rather than an OBS.	
OBS 2009.2	TCF should calculate and determine allowable timber harvest by using rolling periods of no more than 10 years
Reference	FSC Pacific Coast Standard Indicator 5.6.b.
FME response and SCS comment	Since the 2009 audit, TCF has changed its policy on the time frame utilized for determining average annual harvests to a 10-year rolling average. This is clearly stated in the 2010 Policy Digest posted on their website http://www.conservationfund.org/sites/default/files/North_Coast_Forest_%20Conservation_Program_Policy_Digest_August_2010_FINAL.pdf " In the GRF IRMP, we committed to harvesting not more than 35% of growth on the working forest (non-reserve) portion of the Garcia River Forest (GRF) for each of the first two decades (measured on a rolling ten-year basis)."
Disposition of OBS	This Observation is closed.

Background/Justification: During the 2009 annual surveillance audit the audit team determined that although monitoring results that address the subject areas listed in Criterion 8.2. are available to the public, monitoring results are not summarized in a central location.	
OBS 2009.3	TCF should develop a comprehensive summary of monitoring results and incorporate in one annual report for the public
Reference	FSC Criteria 8.5 and 8.2, Indicator 8.5.a
FME response and SCS comment	Since the 2009 audit, TCF has prepared an annual report that includes a very innovative approach to providing a summary of monitoring activities,

	called the Caspar Index. This document has been printed and distributed.
Disposition of OBS	This Observation is closed.

Background/Justification: During the 2009 annual surveillance audit the audit team found that TCF presently lacks a unifying umbrella management plan that provides a cohesion or linkage between the management plans developed for Garcia River and separately for Big River/ Salmon Creek.	
OBS 2009.4	TCF should make publically available a single umbrella management plan summary that presents a unified management plan of the entire North Coast Forest Conservation Program forest units.
Reference	FSC Pacific Coast Standard Criteria 7.1 and 7.4
FME response and SCS comment	The IRMPs developed for the Garcia and the Big River/Salmon Creek Forests are very comprehensive and exemplary in nature. Since the 2009 audit TCF has developed and posted to their website a comprehensive umbrella Policy Digest for the tree forest holdings. This document is available to the public at http://www.conservationfund.org/north_coast_forests/documents .
Disposition of OBS	This Observation is closed.

Background/Justification: During the 2009 annual surveillance audit the audit team concluded TCF would benefit from better training protocols (including maintenance of training records) aimed at assuring that all forest workers and natural resource professionals engaged in the management of the North Coast Forest Conservation Program are adequately informed about and qualified to contribute to the implementation of the management plan.	
OBS 2009.5	TCF should develop a training manual and process for all employees to adequately inform them on the implementation of the management plan. Maintenance of training records should also be improved upon.
Reference	FSC Pacific Coast Standard Indicator 7.3
FME response and SCS comment	Since the 2009 audit, TCF has developed and maintains a TCF Staff Training Log. This was provided to the audit team during the 2010 audit. In addition TCF has implemented a policy of annual safety training for all

	persons working on the forest holdings, if that training is not already a part of their licensing or certification requirements. All persons operating an ATV or other off road vehicle shall have received proper training from a certified ASI Rider Course Instructor. TCF has identified a staff member, the Senior North Coast Forester, as the Safety Officer. In the 2010 Policy Digest the policy statement on training is as follows: "All employees will receive an overview of the IIPP during their initial orientation and can review a copy provided by their supervisor. Additional training, such as First Aid and Interagency Wildland Fire Certification, will be made available on an as needed basis. Employees and contractors that desire additional training should notify their supervisor or the Safety Officer."
Disposition of OBS	This Observation is closed.

6.0 New Corrective Action Requests (CARs)

Nonconformity: The management plans for the Big River and Garcia River/Salmon Creek Forests do not include how the species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6. Indicator 5.6.a states, "In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest levels for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan."	
CAR 2010.1	By the 2011 recertification audit, TCF must provide a public summary of how the species selection and harvest rate calculations were developed.
Reference	FSC 7.1.m

Nonconformity: TCF was not able to provide information required for the annual summary of chemical and pesticide use. They were able to provide the chemicals utilized and the acreage treated, but not the amount of active ingredient utilized in the treatments. This data was requested from TCF by the audit team following the field audit but was not provided.	
CAR 2010.2	By the 2011 recertification audit, TCF must provide the audit team with a summary of pesticide and chemical use since the original certification audit in 2007.
Reference	FSC 7.1.h

Nonconformity: While TCF has done a commendable job of identifying HCVF's on the forest and setting up guidelines for management, enhancement and protection of the HCVF's, they have not provided a breakdown of the area represented in the HCVF's identified. This is required for the audit team to verify that the area represented in all categories of HCVF is not diminishing due to	
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management activities.	
CAR 2010.3	By the 2011 recertification audit, TCF must provide acreages for each type of HCVF represented on the FMU (see Appendix 5 of this report).
Reference	FSC 9.1.a.

6.1 Observations (OBS)

Background/ justification: The TCF has a brief strategy to deal with invasive exotics in both the Big River and Garcia/Salmon Creek management plans. In addition they have prepared an extensive invasive management plan for the Salmon Creek Forest. Some evidence of activity to control and reduce invasive exotic plants was seen on day one of the audit field site visits on the Big River Forest. In light of the extensive distribution of invasive exotic plants such as jubata grass observed in the audit, more effort is needed in this area to develop more extensive plans for invasive exotic species on the Garcia and Big River forests. Following development of the plans implementation of those plans will be observed in future audits. This finding is only at the Observation level, due to the past and current efforts and the recognition of the extent of the problems with invasive exotics by TCF.	
OBS 2010.1	By the 2011 Recertification audit, the TCF should develop an invasive exotic management plan for the whole FMU.
Reference	FSC 7.1.f

Background/ justification: The current plans for TCF may not have adequately addressed the assessment of Representative Sample Areas for the forest holdings. While there is a regional document “Conservation Prospects for the North Coast”, this may not be adequate for an FMU the size and scope of TCF. A large FMU is expected to establish RSAs of purpose 2 and 3 within the FMU. These RSAs are generally in addition to the areas protected in RMZs, HCVs or for RTE species. They may represent areas that are early successional stages or are for reference conditions, in the case of Purpose 1 RSAs.	
OBS 2010.2	Following clarification of the assessment techniques for assessing RSAs, TCF should evaluate the completeness of their assessment of RSAs within and outside of the FMU and identify and designate RSAs as appropriate. According to the guidance for assessment, “assessment for adequacy of representation should generally be in writing.”
Reference	FSC 6.4.a and 6.4.b

Background/ justification: While the management plans do describe the history of land use and past management activities, current forest types and associated development, size class and/or successional stages, the natural disturbance regimes that affect the FMU are only addressed with regard to the impact on salmonid habitat. In FSC 6.1.a an assessment of condition on the FMU is completed and includes “Forest community types and development, size class and/or successional stages and associated natural disturbance regimes ”.	
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OBS 2010.3	By the time of the 2011 recertification audit, TCF should analyze the impact of natural disturbance regimes on the FMU and incorporate the findings into the management plan desired future desired conditions of the forest.
Reference	FSC 7.1.b and 7.1.c

Background/ justification: TCF has recorded some types of stakeholder response to management activities. The record of these is located in several places and sources and was not very complete with regard to email or telephone contacts from stakeholders. Advisory group comments are well documented.

OBS 2010.4	By the 2011 recertification audit, TCF should establish a log of stakeholder responses to management activities. This should include a monitoring mechanism to determine what the follow-up was to the response and who handled the response.
Reference	FSC 8.2.d.4

Background/ justification: FSC-STD-20-001 V3-0, section 22 is a new requirement that cross references well with two criteria of the FSC US standards (4.5.b. and 8.2.d.4).

OBS 2010.5	TCF should create a stakeholder consultation/ grievance procedure that contemplates FSC's interpretation of ISO 65: a) keep a record of all complaints made known to them relating to a product's compliance with FSC requirements (see indicator 8.2.d.4); b) make these records available to SCS upon request; c) take appropriate action with respect to such complaints and any deficiencies found in products or services that affect compliance with the requirements for certification; and d) document the actions taken.
Reference	FSC-STD-20-001 V3-0, section 22

7.0 Stakeholder Comment*

SCS conducts stakeholder outreach as part of annual audits in order to assess on-going conformance to the applicable FSC standards. Stakeholder consultation activities can include telephone calls, written letters, emails or consultation in the field. The results of stakeholder consultation activities are summarized below. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS have been noted.

Box 7.1 – Summary of Stakeholder Comments and Responses from the Team Where Applicable

SCS did not receive any comments from interested parties as a result of stakeholder outreach activities during this annual audit.	<input checked="" type="checkbox"/>
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8.0 Certification Decision

Box 8.1 Surveillance Decision	
The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME's response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: TCF overall does an exemplary job of meeting the FSC standards and promoting sustainable forestry to the general public. The commitment of the staff to an educational component and the overall mission of The Conservation Fund fit well with the FSC objectives. In many areas TCF is a very high achiever when compared to FSC standards. The overall planning efforts and the stakeholder involvement in the forest management activities are exceptional.	

9.0 Current list of Non-SLIMF FMUs (multiple FMU and group certificates only)

Not applicable

Section B - Appendices

Appendix 1 – List of FMUs selected for evaluation (CONFIDENTIAL)

<input checked="" type="checkbox"/> FME consists of a single FMU – <i>No further action required</i>
<input type="checkbox"/> FME consists of multiple FMUs – <i>See table below, which applies to multiple FMU and group evaluations, but is inapplicable if the scope of the evaluation is a single FMU.</i>

Appendix 2 – Evaluation of Management Systems (CONFIDENTIAL)*

The annual surveillance audit consisted of review of documents provided by TCF prior to the site visit of the audit. These consisted of a summary of activities since the last audit, summary of major accomplishments since last audit, website access, previous audit documents, and maps. The field audit consisted of a morning visit to the offices of TCF in Caspar, with review of the scope of the audit, timetable, itinerary review and access to further documents and records. Following the office visit the remainder of the audit consisted of field site visits at two of the three forest planning units, Big River and Garcia River. Salmon Creek was not visited in this audit, partially due to time constraints and the fact that no activities had occurred in that forest since the 2009 audit.

North Coast Forest Conservation Program

Annual Activity Description, September 2010

Timber Harvesting Plans

Please see attached summary table of all plans and individual public THP summaries.

Management Planning

- Final agency approvals of the “*Big River and Salmon Creek Forests Integrated Resource Management Plan*” were received in August and October of 2010. A link to the plan may be found among reference documents on our website at:
http://www.conservationfund.org/north_coast_forests.
- A Spotted Owl Management Plan for the Big River and Salmon Creek properties that incorporates landscape scale habitat planning was prepared at the suggestion of USFWS to streamline agency review in connection with THPs and restoration projects. The Plan, dated 2/25/10, was submitted to the USFWS for review on March 9, 2010, and was approved on March 17, 2010. The Plan and USFWS approval letter were first submitted to Cal Fire in connection with THP 1-09-097.
- At our request consulting botanist Geri Hulse-Stephens prepared “Invasive Plant Management Plan for the Salmon Creek Forest” (July 2010, attached). The plan was the basis for a successful proposal to the CCCs for implementation in December 2010, and will be used as a model for a similar plan for the Big River Forest. For the Garcia River Forest, draft elements of an invasive plant management plan were received from TNC in February 2010. These will be refined over the coming winter and implementation is targeted for 2011.
- Annual update of Fire Plan submitted to Cal Fire and coordination with local Volunteer Fire Departments.
- The historic range of the California red-legged frog (federally threatened) was expanded in 2008/2009 into southwest Mendocino County, which necessitates habitat assessments on the Garcia River Forest in advance of management activities; these commenced last winter (by USFWS staff and contract biologists). To date no suitable habitat has been identified.
- Bird surveys on portions of the Big River Forest are continuing by Mendocino Land Trust. Informal surveys are being conducted on Big Salmon Creek, including by an Audubon guide this fall.
- Forest management policies for the Big River, Salmon Creek, and Garcia River forests have been combined into a single stand-alone document dated August 2010 (attached).
- Peer/field reviews of THPs since the previous audit were conducted on 12/8/09 (Piccolotti) and November 2009 (North Navarro Ridge).
- An annual program review was conducted on January 12, 2009 (internal) and January 13, 2010 (external) (notes available on request).
- Dust-off has been added to the list of chemical applications we track (it was not used in 2010).
- Due to increasing sightings of marijuana gardens on the Garcia River Forest in particular, helicopter surveys of all properties were flown in August 2010 and locations were relayed to the Sheriff’s Department. CAMP staged a helicopter raid July 22 between the Garcia River Forest and adjacent MRC property, seizing from seven sites over 21,000 plants (less than ½ of what

they saw from the air, which they estimate is less than ½ of what's on the ground). Appropriate cautions were relayed to staff and contractors.

Resource Planning & Carbon Certification

- Initiated 10-meter destructive sampling on Big River in August 2010 as a potential new method of determining site quality and calibrating growth rates.
- Initiated property-wide forest inventory in May 2010 on Garcia River Forest as ground-truthing for recent LIDAR imagery (anticipated completion mid-October 2010).
- Post-2009 harvest cruising was completed in November/December 2009 by Madison Thomson; the inventory was updated at the end of 2009 and verified as part of Climate Action Reserve (CAR) audit. Additional field plots will be completed on Big River in October and November 2010 to provide an updated year-end inventory report.
- 2009 CAR verifications were completed in April 2010.
- Field audit for CAR 2010 re-verification for Garcia and Big River/Salmon Creek is scheduled for the first week of February 2011.
- Multiple carbon offset transactions have been completed, involving past vintages and forward-looking contracts.

Assessment and Restoration

- Tree plantings: none required in 2009. Approximately 30 acres in UNF GRF will be planted 1-2 winters following completed harvest.
- Volunteer tree planting: 200 redwood seedlings planted by volunteers in Salmon Creek.
- Three proposals for cost-share funding of road upgrade and/or in-stream large wood placement were submitted to CDFG in May 2010 for Big River, Salmon Creek, and Garcia properties.
- The TNC-led in-stream large wood placement project in Inman Creek on Garcia was completed in fall 2010. A similar project in Signal Creek has been amended into an existing DFG-funded restoration project and will commence in 2011.
- Herbicide treatments: none since last audit for either tanoak or invasive plants.
- Road upgrading projects
 - DFG Fisheries Restoration Grants Program funded projects:
 - Garcia road-based sediment source assessment phase II (remainder of property): fieldwork completed 2009, reporting completed March 2010.
 - Signal Creek (Garcia) Implementation Phase I: approximately 50% complete - remainder will be completed in 2010. LWD component amended into project, to be completed summer 2011.
 - Salmon Creek road-based sediment source assessment: fieldwork completed 2009, final reporting complete March 2010.
 - Salmon Creek Implementation Phase I: not selected for funding by DFG. Prioritized upgrades will be completed in connection with THPs and as funding sources are identified.

- Pulte Holmes Inc on Garcia River Forest: project is complete in Blue Waterhole and hopefully will be completed in Olsen Gulch/North Fork in 2010, weather depending.
- Road-based sediment source assessment on Big River is over 50% complete with cost-share funding from private foundations and RCD. Anticipated completion: 2011.
- Winter road monitoring was conducted on all tracts over the rainy season. Enrollment periods for the Regional Water Board's required monitoring of Erosion Control Plans for all THPs previously under the General Waste Discharge Requirement Program have been completed and terminated.
- Routine road maintenance was conducted on all properties, 2009-2010.
- NSO monitoring was completed for the entire ownership.
- Instream temperature monitoring (Hobo probes) for all properties was completed for 2009 and is in progress for 2010.
- Historic air and instream temperature monitoring in Unit C of Salmon Creek was completed for 2009 and is in progress for 2010.
- Environmental Monitoring and Assessment Program (EMAP) at Garcia was completed in 2009 and 2010 by TNC and the Regional Water Board.
- DFG's fall/winter salmonid spawning surveys continued 2009-2010 on all properties and were expanded in 2010 to include limited stream habitat typing on the Garcia and Big River forests.
- Invertebrate monitoring was continued at Garcia by TNC.
- A bridge across the mainstem of the Garcia River is being replaced. Expected completion: October, 2010. Estimated cost: \$500,000.

Public Outreach

- Advisory Group met in October 2009 and July 2010.
- Offered public tours for each THP prior to submission.
- Conducted public tours of post-harvest THPs on Big River & Salmon Creek.
- Continued partnership with Pacific Community Charter School (65 students, grades 1-8): onsite tour of Inman Creek LWD project (October); all-school presentation by Evan Smith (December); onsite tour cancelled due to rain (June); ongoing coordination for additional presentations, tours, and potential projects.
- Evan Smith gave presentations to the Mendocino Coast Botanical Gardens, Oregon State Land Board, Yale School of Forestry & Oregon Forest Resources Institute.
- Conducted a community meeting and update on TCF activities in the Caspar Community Center on January 13, 2010. Several dozen stakeholders attended and very positive feedback was received during and after the event.
- Volunteers planted 200 redwood seedlings on Salmon Creek, January 2010.
- Second year implementing Stewardship Equestrian Permit Program for Salmon Creek.
- Launched Pilot Stewardship Pedestrian Access Program on Big River and Salmon Creek forests in March 2010.

- Accomplished volunteer-led hand-removal of invasive pampas grass on Salmon Creek. Cost of backhoe removal of pampas (\$700) was split with the local community group. Hand removal of plumes continues.
- Offered community walk in June 2010 to view spring azalea bloom on Salmon Creek.
- Conducted private onsite tours on Big River for CalEPA (May), the Packard Foundation (May) & UC Santa Cruz Professor Tim Duane (June).
- Conducted a public tour in partnership with TNC of the Inman Creek LWD project in August 2010.
- Participated in CA-SIC and local Aerial Fire Patrol Co-op.
- Collaborating with the UDSA Office of Environmental Markets to develop a case study based on the Big River and Salmon Creek forests for the “Farms, Ranches, and Forests of the Future” project to document how markets for ecosystem services are working in selected landscapes.

Administration

- Contractor Jordan Golinkoff became TCF’s staff Forest Carbon Analyst in September 2009.
- Intern Liz Forward joined us as a forestry technician from 11/9/2009 to 11/20/09. Two additional forestry technician interns joined us for the summer: Allison Chambers from UCB and Shelby Semmes from Yale. An associate of Shelby’s who recently moved to the Fort Bragg area, Elizabeth Gish, is currently a volunteer intern working on our economic impact assessment.
- Security and Patrol Volunteer Contractor Rick Cooper retired for health reasons June 28, 2010; an interim contract patrolman has been retained and discussions are in-progress for a long-term contract with Lieutenant Don Miller, retired Mendocino County Sheriff-Coroner office.
- Staff training: TCF sponsored an ATV safety class (May 2010) attended by 2 staff, 2 interns, and 1 TNC staff-member, and TCF also sponsored a First Aid Training (June 2010) attended by 4 staff and 2 interns. Other trainings since the last audit include, for Holly Newberger, a Sudden Oak Death Workshop (UC Extension, May 2010), for Evan Smith, a New Market Tax Credits Workshop by Coastal Enterprises and two one-day TCF workshops on Media Relations and Major Donor Fundraising, and for Madison Thomson a Cal Fire Archeology Training and a Red-legged Frog Survey Training by USFWS.

Appendix 3 – Stakeholder analysis (CONFIDENTIAL)*

3.1 Stakeholder list (confidential)

Name/ Title	Organization	Contact	Consultation method
Jen Carah	The Nature Conservancy		Field
Jason Pelletier	The Nature Conservancy		Field
Lee Susan/Consulting Forester	Summit Forestry		Field
Eric Hontou/Forest Technician	Summit Forestry		Field

Matt Robertson	Philbrick Logging		Field
Karyn Gear	Coastal Conservancy		Field

3.2 Stakeholder review, complaints, and resolution

Box 3.2.1 – Summary of Stakeholder Comments and Responses from the Team Where Applicable	
FME has not received any stakeholder complaints and the annual audit uncovered no known disputes since the previous evaluation. SCS has not received any complaints from stakeholders regarding its performance or treatment of FME's management system.	<input checked="" type="checkbox"/>

Appendix 4 – Additional Audit Techniques Employed (CONFIDENTIAL)*

The audit team did not employ any additional audit techniques for this annual surveillance audit.

Appendix 5 – Changes in Certification Scope

There were no changes in the scope of the certification during the previous year.

Conservation Areas				
<input checked="" type="checkbox"/>	Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives			<i>ha or ac</i>
High Conservation Value Forest/ Areas				
High Conservation Values present and respective areas				
	Code	HCV Type ¹	Description & Location	Area
<input type="checkbox"/>	HCV1	Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		
<input type="checkbox"/>	HCV2	Forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		

¹ High conservation values should be classified following the numbering system given in the ProForest High Conservation Value Forest Toolkit (2003) available at www.ProForest.net or at www.wwf.org

<input type="checkbox"/>	HCV3	Forest areas that are in or contain rare, threatened or endangered ecosystems.		
<input type="checkbox"/>	HCV4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
<input type="checkbox"/>	HCV5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
<input type="checkbox"/>	HCV6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
<input type="checkbox"/>	Total Area of forest classified as 'High Conservation Value Forest'			<i>ha or ac</i>
<i>ANY REDUCTION IN HCVF AREA OR CHANGES IN HCVF/HCVA CLASSIFICATION MUST BE REVIEWED BY SCS TO ENSURE COMPLIANCE WITH FSC CONVERSION POLICIES AND THAT ANY REDUCTION IS THE RESULT OF THE SALE OF LANDS TO OTHER FORESTRY COMPANIES, CONSERVATION GROUPS, STATE AGENCIES, ETC.</i>				

Appendix 6 – Pesticide derogations

Name of pesticide/ herbicide	Date derogation received	Condition(s) imposed by FSC	Annual progress on conditions
None			
See the following FSC documents for more information on pesticide derogations:			
Processing pesticide derogation applications , FSC-PRO-01-004	FSC Fee Structure For Processing Pesticide Derogations , FSC-ADV-30-002		
Approved derogations for use of pesticides, FSC-GUI-30-001a	FSC Forest Managers Checklist For Developing Derogation Applications , FSC-PRO-01-004a		

Appendix 7 – Detailed observations (CONFIDENTIAL)

FMUs containing high conservation value attributes, unless the whole area meets the requirements for classification as a “small forest” (see FSC-STD- 01-003 SLIMF eligibility criteria) require Criteria 6.2, 6.3, 6.9 and 9.4 to be covered each year.

Evaluation year	FSC P&C Reviewed
2010	P1, P4, P7
2011	Recertification, All
2012	
2013	
2014	
2015	

FSC 6.2 – TCF does a commendable job protecting RTE species. They have conducted extensive surveys by qualified professionals for both flora and fauna. Prior to any operations the biologists are contacted to determine the likelihood of finding any species of concern in the sale or operations areas. If any species are discovered during the THP preparation or sale preparation or operations, the appropriate agency, generally DFG, is contacted along with the biologist who would deal with the species. There are special mitigations developed and submitted to DFG for approval and the find is reported to the CNDDB. Hunting and fishing are not allowed on TCF lands.

FSC 6.3 – TCF has identified HCVs on the forest holdings and prepared management guidelines and monitoring protocols for those HCVs. There is no Type I or Type II old growth that has been identified on the forest holdings. There have not been any areas of the forest that have been identified to enhance or restore old growth characteristics; however, the WLPZ protection of Class I streams requires that the 13 largest trees per acre be retained in any harvest operations. In addition trees over 48 inches are permanently retained, as specified in the management plans. The WLPZ that are established on TCF lands exceed the requirements under the FPR and those established in the FSC Standards. Planting that is done, although limited is done utilizing seed sources matched to the site. Planting may increase in the future due to a planned increase in the utilization of group selection as a silvicultural alternative. At the present time group selection has been utilized only on a limited basis and the largest opening has been approximately 2 acres. There are some problems with invasive species, especially on the Big

River Forest. TCF has developed an invasive species management plan for the Salmon Creek Forest and is preparing plans of a similar nature for the Garcia and Big River Forests. **OBS 2010.1**

FSC 6.9 – TCF does not utilize exotic species on the FMU.

FSC 8.2.d.4 – TCF maintains a partial record of stakeholder responses to management activities on the three forests. There is no one person identified to record neither these responses nor the actions taking as follow-up to the stakeholder response. The current log contains both stakeholder responses and other types of incidents, such as broken locks, broken gates, and trespasses. **OBS 2010.4**

FSC 9.4 – TCF monitors HCVs when there are operations that could impact the values identified. Two categories of monitoring will occur: 1) biophysical—related to the distribution and condition of the HCVF features, and 2) programmatic—related to the effectiveness of the protection measures. Biophysical monitoring will consist of:

- Ongoing vegetation mapping as part of forest inventory updates and Timber Harvest Plan preparation, with an updated forest stratification approximately every ten years.
- Ongoing rare plant surveys in the areas within and adjoining planned Timber Harvest Plans.
- Ongoing annual evaluations of Sudden Oak Death distribution and mortality on Garcia River Forest by The Nature Conservancy.
- Aquatic habitat typing by California Department of Fish and Game completed on Garcia and Salmon Creek, to be completed on Big River in 2009-2010, and re-assessed approximately every ten years.
- EMAP aquatic monitoring on Garcia River Forest by The Nature Conservancy and the North Coast Regional Water Quality Control Board—initial assessments completed, re-assessments in approximately ten years.
- Annual summer season stream temperature monitoring at multiple sites on all properties (multiple partners). As a general rule the entire holdings are not monitored on an annual basis for HCVs, since there is little risk of disturbance or loss of the values when no operations are planned.

Programmatic monitoring will consist of 1) an annual evaluation of whether the HCVF features are being sufficiently protected and if there are any new threats to consider and 2) a long-term evaluation of the water quality and stream habitat condition response to TCF forest management and watershed restoration practices. The former will occur as part of the January Program Review; the latter will be developed over the next decade based on observations in the habitat assessment and EMAP measurements (see the GRF Aquatic Monitoring Plan in the IRMP).

No acreages of HCVF's by type are available for the TCF FMU. This is required in order to assess that the areas are not delining through time. **CAR 2010.3**

C= Conformance with Criterion

C/NC= Overall Conformance with Criterion, but there are Indicator non-conformances

NC= Non-Conformance with Criterion

REQUIREMENT	C/NC	COMMENT/CAR
P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
C1.1 Forest management shall respect all national and local	C	TCF had no FPR violations since the last audit. There do not appear

laws and administrative requirements.		to be any issues or concerns with this indicator
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	TCF chooses to pay property taxes, even though they do have tax exempt status. The current yield tax payment documents and canceled check for the 3 rd quarter of 2010 were reviewed in the office and all was in order and up to date.
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	TCF has great concern for these issues and ILO and CITES and the Convention of Biological Diversity are observed.
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.	C	There have been no conflicts that have arisen between the FSC Principles and Criteria and laws and regulations that apply.
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	There has been an ongoing problem of trespass for illegal cultivation of marijuana on TCF properties. The managers have been working with the Sheriff's Department to deal with illegal gardens when they are discovered. There is some lack of cooperation from the Sheriff's Department, but progress has been made with the removal of some sites. There is also a potential health and safety issue from these trespass activities, since individuals sometimes resort to violent acts to protect the plants. TCF needs to train personnel well on how to deal with these findings and continue to work with local authorities to try to reduce the problem.
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	C	TCF has inserted the following statement about FSC certification in the July 2010 Policy Digest. "The Conservation Fund has committed to seeking dual certification under the Forest Stewardship Council and Sustainable Forestry Initiative programs. All properties are to be managed in compliance with the 2005-2009 SFI Standard and the FSC Pacific Coast Regional Standard, version 9.0." In addition there is a conservation easement on the Garcia River Forest that requires maintenance of FSC certification.
P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	C	TCF utilizes local contractors and services whenever it is possible. The forestry services are from a local consulting firm, Summit Forestry. Logging contractors and pesticide contractors have been local in the past and preference is given to local contractors. A section of the economic impact analysis states; "In selecting contractors, TCF strives to hire local individuals and small businesses. In addition, program activities indirectly support a number of local jobs by purchasing services from a total of 72 vendors that have supplied the Caspar office since 2006."

<p>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	<p>C</p>	<p>TCF is in compliance with applicable laws and regulations. They have an employee manual adopted in January 2009 which covers most personnel policies and health and safety requirements for employees.</p>
<p>C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p>	<p>C</p>	<p>TCF is in compliance with California labor laws, which provide these rights of the ILO 87 and 98 Conventions.</p>
<p>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.</p>	<p>C</p>	<p>TCF has just completed an economic analysis of the impact of operations on the local communities in terms of employment and economics. "Since 2006, the direct and indirect economic impacts of TCF's North Coast Forest Conservation Program have totaled over \$7.2 million."</p>
<p>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	<p>C</p>	<p>The Employee Manual from January 2009 covers personnel procedures for resolving grievances, whistleblower policies, TCF has in place an ombudsman who is designated a neutral or impartial dispute resolution resource whose major function is to provide independent, confidential and informal assistance to all employees of the organization. The ombudsman provides a means of protecting against abuse, bias and other improper treatment or unfairness.</p>
<p>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>C7.1. The management plan and supporting documents shall provide:</p> <p>a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</p> <p>i) Description and justification of harvesting techniques and equipment to be used.</p>	<p>C</p>	<p>The suite of TCF management planning documents includes, but is not limited to, <i>North Coast Forest Conservation Program Policy Digest</i> August 2010, <i>Conservation Prospects for the North Coast</i>, <i>Garcia River Forest Integrative Resource Management Plan</i>, <i>Big River and Salmon Creek Forest Integrative Resource Management Plan</i>, Timber Harvest Plans, the GRF TNC conservation easement, and the BR/SC MOU.</p> <p>Collectively these documents contain all the essential elements for planning including sections on current and historical conditions, management goals and objectives, and community and community use and involvement.</p> <p>TCF has an extensive mapping system utilizing GIS. Several types of maps were included in the audit review and field site materials for the audit team.</p> <p>Extensive surveys have been conducted by qualified biologists for RTE species on the forests.</p>

<p>7.1.a. . The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	<p>C</p>	<p>The management plan includes a legal description of ownership and its resources. The rights of TCF and the conservation easements that are in place are included as well. For properties that include an MOU covering management expectations and guidelines, those are included in the appendices of the IRMP.</p>
<p>7.1.b. . The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</p>	<p>C</p>	<p>A brief description of the past management activities and the resulting forest is contained in the IRMP. “A 150-year history of forest harvesting has resulted in the current forest conditions, which can be characterized as a young redwood/Douglas-fir forest with a high component of tanoak. Compared to pre-settlement conditions, the Forest is very young, relatively simplified and characterized by an unnaturally high density of hardwoods.”</p> <p>Because of past harvesting practices, very few stands are currently in a desirable condition (because of low stocking, small diameters and/or poor-quality trees). Most stands will take several decades to reach this steady-state condition with multiple intermediate harvest entries to guide this development. Until we reach the ideal steady-state condition, the silviculture focus will be on creating and/or building stands of higher quality and better growth potential. Many stands (especially on Big River) are young and even-aged, from clearcuts or aggressive selection harvests in the last thirty years. These types of stands are, for the most part, growing quickly and with good-quality stems—but they are small in diameter (average 12” or less) and lack structure from a habitat perspective. C stands will receive thinnings to accelerate stand development and concentrate growth on high-quality stems. These selective harvests will occur every 10-20 years with the long-term objective of moving the stands into the desired future condition. These thinnings will yield low harvest volumes and small average piece sizes so they will need to be carefully-designed to be economically-viable.</p> <p>The natural disturbance regimes are not covered extensively in the IRMP, except for the impacts on salmonid habitat. These are not included in the desired future conditions discussion or goals and objectives. OBS 2010.3</p>
<p>7.1.c The management plan describes:</p> <p>a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.</p>	<p>C</p>	<p>Management objectives and long-term goals for the forests are described in the IRMP for the various forests. In addition there are MOUs that exist that dictate some long-term management objectives and goals for the forests. As covered in Indicator 7.1.b the discussion and inclusion of the natural disturbance regime in the future desired conditions is not adequate. OBS 2010.3</p> <p>The silviculture has a general description in the various IRMPs; however, the detailed silvicultural prescriptions are included in the THPs prepared for the specific timber harvests. According to the Garcia River/Salmon Creek Forest IRMP, “Our silviculture will be primarily uneven-aged, to develop and maintain a range of tree sizes</p>

		and ages within a stand, with the goal of producing valuable sawtimber and utilizing natural regeneration. The primary methods are selection, both single tree and group, and transition silviculture. Transition silviculture is a prescription utilized when stand conditions do not lend themselves to single tree or group selection due to stand structure or composition resulting from past harvest practices. See additional discussion of forest conditions under 7.1.b.
7.1.d The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.	NC	The rate of harvest selection and species selection for harvest is covered in a timber assessment and the MOUs for the forests. The IRMP and other public documents do not contain a discussion on the methodology or the rationale for the rates of harvest. CAR 2010.1
7.1.e. The management plan includes a description of the following resources and outlines activities to conserve and/or protect: <ul style="list-style-type: none"> • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9); Other special management areas.	C	The IRMP addresses monitoring in general with a more specific monitoring plan also developed. According to the Garcia River/Salmon Creek Forest IRMP: “To evaluate our success and improve our management we are developing a comprehensive monitoring program. Monitoring of conservation targets will include regular assessment and tracking of indicators of their long-term viability. A number of other Property attributes also will be monitored, including erosion and water quality, forest inventory and growth, carbon accumulation, rare plants and northern spotted owls. See additional discussion of monitoring protocols under 9.4. The IRMP includes very comprehensive assessments of the aquatic, floral, geological/soils, and northern spotted owl. From these HCVs and RSAs have been identified on the Forests.
7.1.f. . If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.h).	C	TCF has developed an extensive invasive species management plan for the Salmon Creek Forest. There is some discussion of invasive species management in the IRMPs for Big River and Garcia River; however, in light of the extensive distribution of invasive plant species in the Big River Forest, more management planning and action is warranted. TCF has plans to develop invasive species management plans, like the one for Salmon Creek, for both Big River and Garcia River Forests. OBS 2010.1
7.1.g The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).	C	There is a basic coverage of some of the more pervasive insect and diseases that are present or likely to occur on the Forests included in the IRMPs. A broader coverage of insects and diseases might be warranted in the future. The impacts of climate change on the likelihood of insect and disease problems increasing might be considered in a renewed look at this indicator.

<p>7.1.h. . If chemicals are used, the plan describes what is being used, applications, and how the management system conforms to Criterion 6.6.</p>	<p>NC</p>	<p>Chemical use is very limited on the forest and most uses are for the control of invasive plant species or for competition control. The competition control is mainly for tanoak, a species which has an increased presence on the forest due to past management activities.</p> <p>CAR 2010.2</p>
<p>7.1.i. . If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms to Criterion 6.8.</p>	<p>C</p>	<p>No biological control agents are used on the Forests.</p>
<p>7.1.j. The management plan incorporates the results of the evaluation of social impact, including:</p> <ul style="list-style-type: none"> • Traditional resources and rights of use (see Criterion 2.1); • Potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • Management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • Management of aesthetic values (see Indicator 4.4.a); • Public access to and use of the forest, and other recreational issues; • Local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicator 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g) 	<p>C</p>	<p>TCF has completed an evaluation of social impact of the management activities on the local community. This includes employment, direct and indirect impacts.</p> <p>The evaluation of the impact of management activities on traditional resources, customary uses and rights, ceremonial, archeological, and historic sites, aesthetic values, and public access and use of the forest are covered under the IRMPs and THPs.</p> <p>TCF generally does not open the forests to public access, but states in its documents: “It is our goal to provide a variety of public access opportunities that can be reasonably managed and that are consistent with the protection of natural resources, long-term restoration and enhancement, and active forest management. These opportunities range from research, education, and demonstrations to citizen participation in restoration to unsupervised pedestrian trail access.”</p>
<p>7.1.k The management plan describes the general purpose, condition and maintenance needs of the transportation network.</p>	<p>C</p>	<p>Each of the IRMPs has an extensive road management plan.</p>
<p>7.1.l The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.</p>	<p>C</p>	<p>In general single tree or group selection silviculture is stated as the preferred silviculture by TCF. The actual site specific prescriptions are included in the THPs. TCF further states that, “Forests are highly variable so it is impossible and unwise to prescribe “one-size fits all.” Further, each of the forests reflects a management legacy that limits our silvicultural options. For example, prior management of the Garcia River Forest has left very young stands with limited commercial volumes. For the most part, these stands are growing well—they just have limited silvicultural options in the short-term. On Big River and Salmon Creek, a history of clear-cuts will force difficult choices between the remaining well stocked stands and stand classes that are several years away from supporting our preferred silvicultural methods. Additionally many of the partial harvests of the past did not always leave the high-quality trees we desire. Finally, we are learning more every day about how to manage forests for both economic and environmental objectives and our</p>

		approaches will change with future scientific research and operational realizations.”
7.1.m The management plan describes how the species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.		The management plan contains only a cursory coverage of this important indicator. There are documents that explain the how the species selection and harvest rate calculations were derived, but these are not included in the <i>Garcia River Forest Integrative Resource Management Plan</i> or the <i>Big River and Salmon Creek Forest Integrative Resource Management Plan</i> . These are the main planning documents utilized and would generally constitute the planning documents where these calculations would occur. The calculations are included in some of the other documents listed in the comments related to C.7.1, however, some of these documents; particularly the documents containing the calculations are not readily available to the public. OBS 2010.5
7.1.n The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	C	The monitoring procedure is described in the discussion under 8.2.d. and 9.4. OBS 2010.4
7.1.o The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.	C	TCF utilizes GIS to produce maps for use in management planning. This system is extensive and provides for relatively easy production of maps for nearly any consideration or need. Several examples are included in the IRMPs. Cal Fire requires GIS based maps for all THPs. Other management activities are able to utilized maps from this system as well. During the audit we observed the use of such maps for a stream restoration project and THP summaries.
7.1.p The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.	C	Specifics of harvesting machinery and techniques are included in the THP documentation prepared for all timber harvests on the Forest. These undergo extensive agency review and are available for public review and comment. Cal Fire is required to only approve alternatives in a THP with minimize or limit impacts to the resource.
7.1.q Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, and necessary environmental safeguards, health and safety measures, and include maps of adequate detail.	C	This is required by Cal Fire. The THP documentation is extensive and a pre-harvest inspection is done on the ground with multiple agency representation. As part of this inspection special mitigation activities are normally reviewed and discussed. Review of THP documents during the audit demonstrated the review, comment, and modifications that result from the process. Also as part of this process, if there are water crossings to be installed or reworked a Stream Alteration Permit is required from DFG.
7.1.r The management plan describes the stakeholder consultation process.	C	Advisory groups have been established by TCF to provide for an avenue of stakeholder consultation. All THPs undergo a period of public review and comment through the Cal Fire required process.
C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing	C	The IRMPs are all relatively new and have not undergone revision at this time.

environmental, social and economic circumstances.		
7.2.a. The management plan shall be reviewed on an ongoing basis and updated whenever necessary, at a minimum of every 10 years, to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	C	TCF has been handling this need through the use of additional documents, such as <i>the North Coast Forest Conservation Program Policy Digest, August 2010</i> . The yield calculations are revised on a 10-year cycle.
C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	TCF has training records available for all staff. These were reviewed during the audit. An employee manual, <i>The Conservation Fund Employee Manual, January 2009</i> , includes information on required training for staff. Contracts for services such as forestry, logging, and pesticide application specific training and certification levels required by contractors.
7.3.a. Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	TCF staff and contracted foresters provide guidance and supervision on implementation of various plan components, such as logging and rehabilitation projects. Foresters are RPFs in California or are forestry technicians working under the direct supervision of an RPF. Other staff have various management skills required to implement the plan.
C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	The IRMPs, THPs, and other documents are all public documents and TCF operates in a very open and communicative style.
7.4.a. While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	Since the entire IRMP documentation is posted on the website and all the required items in 7.1 are included, the public can access all the elements of the plan free of charge. The web information is: http://www.conservationfund.org/
7.4.b. Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.	NA	