

**New York State
Department of Environmental Conservation
Division of Lands and Forests**

625 Broadway, 5th Floor
Albany, NY 12233-4255

SFI 2015-2019 Standards and Rules®
Section 2: Forest Management Standard
Section 9, Appendix 1: Audits of Multi-Site Organizations

3rd Surveillance

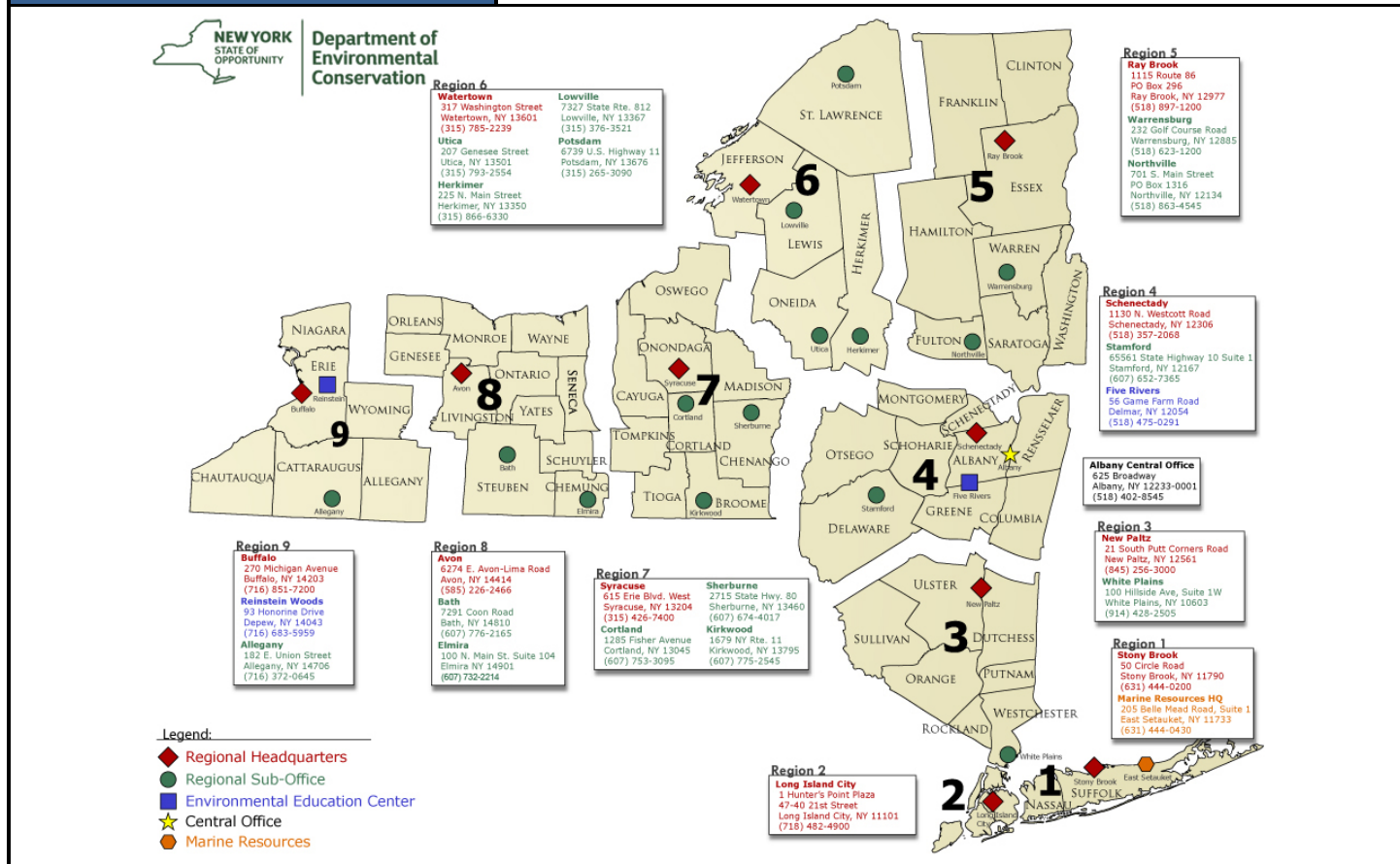




NSF Forestry Program Audit Report

A. Certificate Holder Information

Certificate Holder	NYDEC- Forest resources Management Division of Land and Forests
Customer Number	6L741
Contact Information (Name, title, phone & email)	Josh Borst, Forester 2 Forest Resource Management Division of Lands and Forests NY State Department of Environmental Conservation Broadway, 5th Floor, Albany, NY 12233-4255 P: (518) P: (518) 473-9209 F: (518) 402-9028 Email: joshua.borst@dec.ny.gov
Scope of Certification	The management of New York State Forests in Regions 3-9, including Reforestation Areas, Multiple Use Areas and Unique Areas and related activities in support of sustainable forestry. SFI Forest Management code: NSF-SFI-FM-6L741.
Locations Included in the Certification Note: may be listed as plain text or included in an appendix or a separate file.	The land management activities and forestry offices in NY State Forests in Region 3-9, 2019. See map below of all activities and offices in Regions 1 & 2 excluded from the Green Certification program.





Significant Changes to Operations or to the Standard(s)	<p>Personnel changes with the organization and improvements with staffing related to field technicians' status.</p> <p>EPA air emission regulations: NYDEC needs to report currently working with contractors on equipment and usage on the landscape into a spreadsheet still in process.</p> <p>Strategic Plan for State Forest Management is in process of being reviewed and updated.</p> <p>Newly implemented system of tracking reaching out to Indigenous people prior and during the UMP process.</p>
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B. Audit Team

Lead Auditor	Sr. Lead Auditor Keri Yankus
Audit Team Member(s)	None

C. Site Visits

Date and Location of Each Visit	<p>9/22/2020 Region 6 Potsdam office:6739 U.S. Highway 11, Potsdam, NY 13676</p> <p>9/23/2020 Region 5 Ray brook Office:1115 Route 86 Ray Brook, NY 12977</p> <p>9/24/2020 Central Office: Albany 625 Broadway, 5th Floor Albany, NY 12233-4255</p>
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D. Audit Results

Auditor Recommendation	<p><input type="checkbox"/> Grant, maintain or renew certification</p> <p><input checked="" type="checkbox"/> Grant, maintain or renew certification pending closure of CARs</p> <p><input type="checkbox"/> Grant, maintain or renew certification pending follow-up assessment</p> <p><input type="checkbox"/> Do not grant, maintain or renew certification (notify NSF office immediately)</p>
Number and Summary of Findings of "Exceeds the Requirements"	<p>1: 3.1.3. Monitoring of overall best management practices implementation.</p> <p>Notable: Significant improvements have been made by field foresters to document in their "sale diary" project files the status of each activity (field notes & photos). This documented evidence is kept at regional level.</p>
Number and Summary of Findings of "Opportunity for Improvement"	<p>2</p> <p>4.4.2 A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions. Statewide: Although the system is conforming, there may be an opportunity to improve and enhance the incorporation of research results into future forest management decisions.</p> <p>8.1.1 Reviewed Memorandum dated 11/15/2017 RE: UMP Development and Department Consultation with Indian Nations. "Communication between the Department and Indian Nations should be direct and involve two-way dialogue and feedback. Regional staff should contact the appropriate tribal representatives in the UMP planning area at the same time that a public scoping session is scheduled. When possible and where appropriate, staff should facilitate an in-person meeting with tribal representatives to involve them in the planning unit management planning process. Where an in-person meeting is not feasible, the preferred method of engaging the Indian Nations is via a phone call. Letters and emails are not preferred communication methods" Statewide: Although the system is conforming, there may be an opportunity to re-check current wording expectations as stated in the Memorandum to how organization is currently communicating with Indian Nations.</p>



<p>Number and Summary of Findings of “Minor Nonconformity”</p>	<p>1: 9.1.3. Demonstration of commitment to legal compliance through <i>available regulatory action information</i>. This process is not fully effective. Objective evidence: TRP document is shared with multi agencies and is in the very early stages of the lean process. NYDEC Lands Forests central office confirmed a draft memo was created however, it is unclear how the central office plans to deploy this memo to all field staff regarding changes to the TRP & changes made to the procedures. EXTENDED MINOR CAR: While a plan to address this is beginning, this has not been implemented. COVID-19 has limited work/travel that NYDEC employees have been able to accomplish, therefore this is not upgraded, and the Minor CAR is extended.</p>
<p>Number and Summary of Findings of “Major Nonconformity”</p>	<p>0</p>
<p>Summary of review of nonconformities from previous audit(s)</p>	<p>1: 9.1.3. Demonstration of commitment to legal compliance through <i>available regulatory action information</i>. This process is not fully effective. Objective evidence: TRP document is shared with multi agencies and is still in process of various stages of the lean process. NYDEC Lands Forests central office confirmed a draft memo was created however, it is unclear how the central office plans to deploy this memo to all field staff regarding changes to the TRP & changes made to the final procedures. EXTENDED MINOR CAR: While a plan to address this is beginning, this has not been implemented. COVID-19 has limited work/travel that NYDEC employees have not been able to accomplish, therefore this is not upgraded, and the Minor CAR is extended.</p>
<p>Notes from Opening and Closing Meetings</p>	<p>Opening and closing meetings were held remotely via Cisco WebEx during the regular scheduled audit times, due to COVID-19 concerns and State guidance regarding gatherings of people.</p>
<p>All logos and/or labels, including ANSI, ANAB, SFI, PEFC, ATFS, etc. are utilized correctly in accordance with NSF policies.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (a finding of nonconformity should be issued) <input type="checkbox"/> N/A (not using any labels or logos on any marketing materials, website, finished products, etc.)</p>

E. Surveillance Review

<p>Explain how the management system is capable of meeting the applicable requirements and expected outcomes of the audit</p>	
<p>Answer</p>	<p>Capability of the management system is demonstrated by the very low number of nonconformities identified during annual audits and the continued high performance during a time of changing markets and uncertainty caused by the Covid-19 Virus. The company continues to emphasize a strong commitment for the implementation of their SFI® Program.</p>

F. Recertification Review

<p>Auditors are required to review the reports from all audits in the current certification period, starting with the certification or recertification audit and including all surveillance or other audits. The auditor shall consider the performance of the program over the cycle through a review of internal audits, management reviews, corrective actions, continual improvement, and NSF audit findings, to determine if there is evidence of:</p> <ul style="list-style-type: none"> • An effective interaction between all parts of the program and its overall effectiveness? • An overall effectiveness of the system in its entirety in light of internal and external changes? • A demonstrated commitment by top management to maintain the effectiveness and improvement of the system to enhance overall performance? • Continual improvement over the cycle? • The program contributing to the achievement of the client’s policy and objectives, and the intended results? • Repeated audit findings during the audit cycle that would indicate systemic issues? 	
<p>Answer</p>	<p>N/A – Surveillance Audit</p>



G. Appendices

Appendix 1	Audit Notification Letter & Schedule
Appendix 2	SFI Forest Management and SFI Multi-Site Checklists and Field Notes
Appendix 3	SFI Forest Management Public Summary Report
Appendix 4	Meeting Attendance
Appendix 5	COVID -19 Appendix



Appendix 1

Audit Notification Letter

14-August 2020

Josh Borst, Forester 2
Bureau of Forest Resource Management, Division of Lands and Forests
New York State Department of Environmental Conservation
625 Broadway, 5th Floor, Albany, NY 12233-4255

RE: 3rd surveillance SFI 2015-2019 audit

Dear Mr. Borst,

As we discussed, I will be conducting your SFI 3rd surveillance audit and dates of September 22 & 23, 2020 on site and September 24, 2020 remotely as described in the attached itinerary. Please confirm that these dates are still appropriate for the audit of your program's continued conformance to the SFI 2015-2019 section 2 Forest Management and section 9 Multi site requirements.

Preparing for the Audit

A key part of the audit is a review of selected evidence related to your program, which may include:

Field Site Selections:

Please provide a list of management activities for the forests being audited. The lists should be as comprehensive as possible, covering recently completed, ongoing, and planned harvests at a minimum. Please also include lists of other management activities (road building, site-preparation, planting, TSI or release for example) in cases where compiling such lists will not be unduly time-consuming. The lead auditor will make preliminary random selections from these lists. I will then ask your forest manager to prepare suggested itinerary which include our primary selections supplemented by sites which are proximate, or which combine into efficient travel routes.

We will need to complete the preliminary selections **at least week** before the start of the audits to allow you time to prepare travel route keeping in mind, we will be looking at the newly acquired land and adjacent forest management activities on NYDEC Lands.

A key part of the audit is a review of evidence related to your program, which may include:

Forest Management Plan for the lands to be audited to SFI

- Status of Inventory and growth and yield modeling
- Approval for logo usage (if used SFI and NSF)
- Internal Audit records
- Management Review records
- Training records (Internal and external)
- Documentation for operation of complaint procedure
- Herbicide and Pesticide listing of chemicals and acreage
- Policies regarding certification, health, and safety (Example Organizations HR Manual)
- Wildlife habitat plans and forestry prescriptions
- BMP monitoring documents
- Contracts with loggers/operators/truck drivers and road building operators
- Listing of State and Regulatory contacts including but not limited to (NY SIC)
- Invoice showing commitment to research and educational opportunities
- Educational Opportunities for Loggers/landowners/community outreach
- Any ILO (International Labor Organization) complaints
- Average sizes of clear cuts
- How many acres planted
- How many acres burned
- Cultural resources listed with SHPO (State Historic Preservation Office)



- Recreational Leases documents/records and monitoring program

Please have this information available for me prior to the audit. Documents may be uploaded in advance to the file sharing platform.

Scope of Certification

The management of New York State Forests in Regions 3-9, including Reforestation Areas, Multiple Use Areas and Unique Areas and related activities in support of sustainable forestry. SFI Forest Management code: NSF-SFI-FM-6L741. (Regions 1 & 2 excluded from the Green Certification program).

SFI Requirements Selected for 2020 Surveillance Audit

The audit will include a sampling of requirements within Objectives 1 through 8 (field-oriented requirements) to the extent they are relevant to the field sites inspected. In addition, the following SFI requirements will be audited (Note: The first number indicates the Objective: example, 8.1 is under Objective 8.):

1.1.1	Forest management planning at a level appropriate to the size and scale of the operation, including.
1.1.4	Periodic updates of <i>forest inventory</i> and recalculation of planned harvests to account for changes in growth due to <i>productivity</i> increases or decreases, including but not limited to: improved data, <i>long-term</i> drought, fertilization, <i>climate change</i> , changes in forest land ownership and tenure, or <i>forest health</i> .
2.3 (all)	Program Participants shall implement forest management practices to protect and maintain forest and soil productivity.
2.4 .1 & 2.4.3	Program to protect forests from damaging agents. Participation in, and support of, fire and pest prevention and control <i>programs</i> .
3.1.1	<i>Program</i> to implement federal, state or provincial water quality <i>best management practices</i> during all phases of management activities.
3.1.3	Monitoring of overall best management practices implementation.
3.2.1	<i>Program</i> addressing management and <i>protection</i> of rivers, streams, lakes, <i>wetlands</i> , other water bodies and <i>riparian areas</i> during all phases of management, including the layout and construction of roads and <i>skid trails</i> to maintain water reach, flow and quality
3.2.3	Document and implement plans to manage and protect rivers, streams, lakes, <i>wetlands</i> , other water bodies and <i>riparian areas</i> .
5.1.1 5.1.2.	Program to address visual quality management. Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.
5.4.1	Provide recreational opportunities for the public, where consistent with forest management <i>objectives</i> .
6.1.1	Use of information such as existing natural heritage data, expert advice or stakeholder consultation in identifying or selecting <i>special sites</i> for <i>protection</i> .
8.2.1	<i>Program</i> that includes communicating with affected <i>Indigenous Peoples</i> to enable <i>Program Participants</i> to: <ol style="list-style-type: none"> understands and respect traditional forest-related knowledge. identifies and protect spiritually, historically, or culturally important sites. addresses the use of non-timber forest products of value to <i>Indigenous Peoples</i> in areas where <i>Program Participants</i> have management responsibilities on public lands; and responds to <i>Indigenous Peoples'</i> inquiries and concerns received.
9.1.3 & 9.2.2	Demonstration of commitment to legal compliance through <i>available regulatory action information</i> . <i>Forestry enterprises</i> will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions.



10.1.1 11.1.3 11.1.4	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 <i>productivity</i> , water quality, biodiversity, community issues, or similar areas which build broader understanding of the benefits and impacts of forest management. Staff education and training sufficient to their roles and responsibilities & Contractor education and training sufficient to their roles and responsibilities.
12.2.1. 13.1	<i>Program Participants</i> shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management. <i>Program Participants</i> with forest <i>management responsibilities on public lands</i> shall participate in the development of <i>public land</i> planning and management processes.
14 & 15 All	Communications and Public Reporting Management Review and Continual Improvement
15.1 IAF=MDI	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. Multisite requirements

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:

Courtney P. Guillen
 Coordinator, Statistics and Label Use
 Sustainable Forestry Initiative
 Phone: 202.719.1391 ext. 338
 Email: Courtney.Guillen@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,
Keri Yankus

Keri Yankus, CF
 NSF Sr. Lead Auditor
 603-340-1304
kyankus@nsf.org

Copy: SCS Evan Poirson, FSC Lead Auditor



Audit Agenda

Type of Audit

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

Audit Objectives

Determine if certification should be maintained SFI 2015-2019 Standards and Rules®, Section 2, Forest Management, and section 9 of multi-site requirements.

Schedule

Day/Date	Time	Activity/Process and Location to be Audited	Auditor(s)
Tuesday, 22 September 2020- Onsite in the field			
	9:00-9:15 am	Opening Meeting: Region 6: See regional map attached for address Brief Opening Meeting <i>Processes:</i> Review changes to the Facility Record Sheet (contact information, billing information, etc.) Discuss changes/improvements to the SFI Program, changes in operations, or changes in scope since the Re-certification audit Review NSF SFI Audit Procedures Discuss field site visit provisions and other logistical issues Verify effective implementation of any corrective action plans from the previous audit (1 minor non-conformance Identified 9.1.3 Demonstrate of commitment to legal compliance through available regulatory action information). Check status 2 OFI issued: 4.4.2 incorporate research results and field applications of biodiversity 1.1.3 forest inventory Review SFI Survey forms and confirm public report is available to public Review minutes of Management meetings Review Logo or Label use issues Head to the field to see field sites	KY
	9:15- am	Interviews: Review key documents that address SFI standard 2015-2019 Standard changes; SFI Program Review – (SFI 2015-2019 Standard): Process of checking on Obj. 1-15 Requirements for the Standard, field review focus <ol style="list-style-type: none"> 1. Management Planning 2. Forest Health and Productivity 3. Protection and Maintenance of Water Resources 4. Conservation and biological diversity 5. <i>Management of Visual Quality</i> and Recreational Benefits 6. Protection of Special Sites 7. Efficient Use of Fiber Resources 8. Recognize and Respect Indigenous Peoples' Rights 9. Legal and Regulatory Compliance 10. Forestry Research, Science and Technology 11. Training and Education 12. Community Involvement & Landowner Outreach 13. Public Land Management Responsibilities 	KY



		14 Communications & Public Reporting 15 Management Review & Continual Improvement Multi -site requirements (All)	
	12:00 – 12:30 pm	Lunch in the field	KY
	1-4:30 pm	Region 6 Continued field visits - NSF auditor with NYDEC Region 3 staff Possible Process SFI topics: (forest management activities, wildlife issues, invasive plants, road building/dozer operator interviews, inventory, forest health issues, recreation, and fire management if any, logger (active harvest site=interviews) TRP, tree planting (local/native), BMP, unique flora or fauna, and spray sites).	KY
Wednesday, 23 September 2020- On site in the field			
	8:00 am-8:30 am	Brief Opening meeting with NYDEC staff Review and finalize field sites Regions 5 <u>FRS #6L741</u> (See Regional Map attached for addresses)	KY
	8:30 am	Head to the field sites for Regions and 5 NSF auditors both in field with NYDEC Possible Process SFI topics: (forest management activities, wildlife issues, invasive plants, road building/Logger operator interviews, inventory, forest health issues, recreation, and fire management if any, logger (active harvest site=interviews) TRP, tree planting (local/native), BMP, unique flora or fauna, and spray sites). Obj. 1-15 Requirements for the Standard, field review focus 1 Management Planning 2. Forest Health and Productivity 3. Protection and Maintenance of Water Resources 4. Conservation and biological diversity 5. Management of Visual Quality and Recreational Benefits 7. Efficient Use of Fiber Resources 8. Recognize and Respect Indigenous Peoples' Rights 10. Forestry Research, Science and Technology 11. Training and Education 12 Community Involvement & Landowner Outreach 13 Public Land Management Responsibilities 14 Communications & Public Reporting 15 Management Review & Continual Improvement Multi -site requirements	KY
	12:00-12:30pm	Lunch in the field - all	ALL
	12:30 – 4:00pm	Field sites for Regions and 5 continues– Main Albany office staff will participate and will be in the field with Auditors and other field NYDEC foresters. Possible SFI processes: 8. Recognize and Respect Indigenous Peoples' Rights 10. Forestry Research, Science and Technology 12 Community Involvement & Landowner Outreach 13 Public Land Management Responsibilities 14 Communications & Public Reporting 15 Management Review & Continual Improvement	KY
	4:30 pm	Daily debrief with Regions 5	KY
Thursday, 24 September 2020 (Remotely through ITC Method Cisco WebEx)			
	8:00 am	Brief Opening meeting with Albany Office: FRS #6L741 Main Office 625 Broadway, 5th Floor Albany, NY 12233-4255	KY



	8:30 am	<p>NSF auditor Office interviews and documentation reviews at the Albany NYDEC. Possible Process SFI topics: (forest management activities, wildlife issues, invasive plants, road building/Logger operator interviews, inventory, forest health issues, recreation, and fire management if any, logger (active harvest site=interviews) PCT, tree planting (local/native), BMP, unique flora or fauna, and spray sites).</p> <p>Obj. 1-15 Requirements for the Standard, field review focus</p> <ol style="list-style-type: none"> 1. Management Planning 2. Forest Health and Productivity 3. Protection and Maintenance of Water Resources 4. Conservation and biological diversity 5. Management of Visual Quality and Recreational Benefits 7. Efficient Use of Fiber Resources 8. Recognize and Respect Indigenous Peoples' Rights 10. Forestry Research, Science and Technology 11. Training and Education 12. Community Involvement & Landowner Outreach 13. Public Land Management Responsibilities 14. Communications & Public Reporting 15. Management Review & Continual Improvement <p>Multi -site requirements.</p>	KY
	12-12:30 pm	Auditors caucus and follow up any audit trails. Prepare for closing meeting	
	1 pm	Closing meeting with Albany staff and Regions 6 & 5 via conference call in	

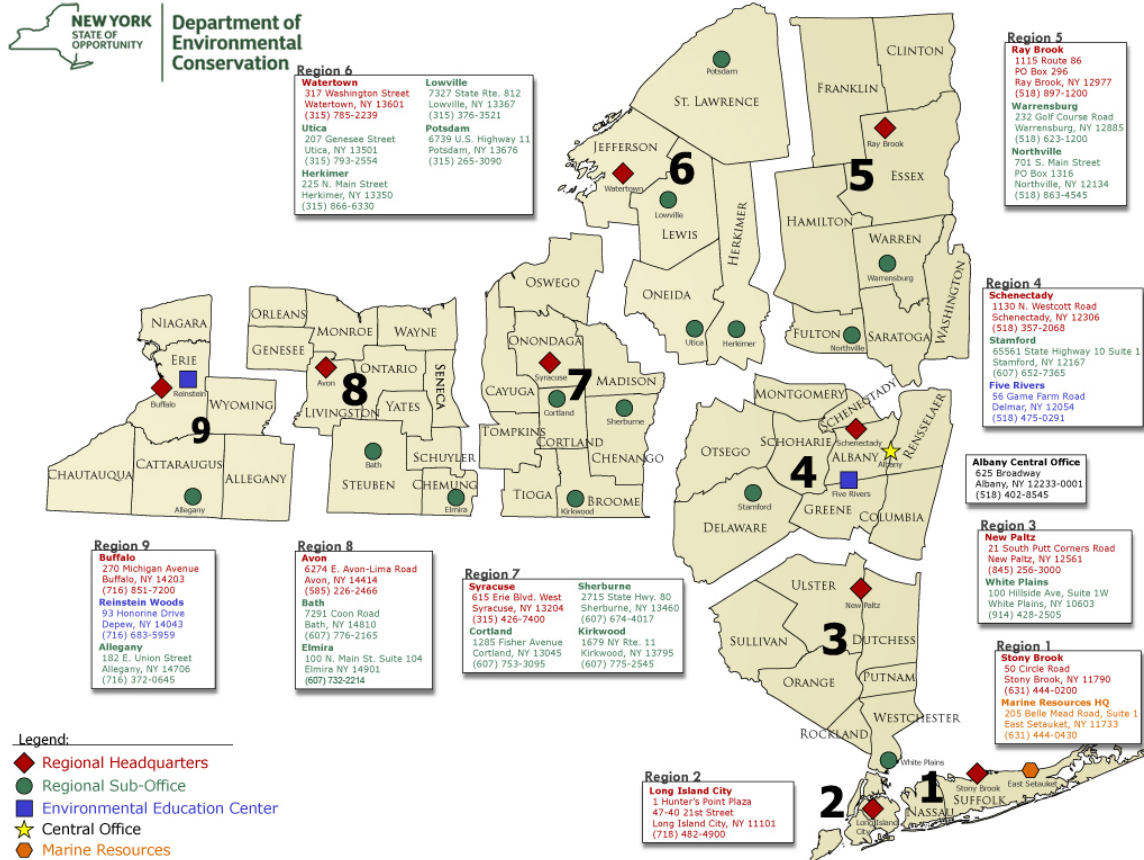
**Audit times approximate and may vary also. Not all SFI indicators will be covered as this is 3rd surveillance audit.

Audit logistics

- **Travel:** Auditors travel to hotel Monday 21 September, and meeting in the morning in the parking lot of hotel 22-September Tues Travel home the afternoon of Wed 23 September 2020.
- **Rental Car:** SCS to have a rental car for travel to audit start and end locations. NSF auditor has own personal vehicle to travel in. Both Auditors will not travel in State employee vehicles due to COVID-19 concerns; daily auditor travel will also be in the auditor's rental vehicle or personal vehicle.
- **Lodging:** Auditors to book lodging in coordination with NYDEC staff.
- **Meals:** Auditor and State employees will be limiting shared meals together, using takeout/prepared meals/delivery service. Daily lunches in the field will either be prepared lunches or purchased directly by auditors in the morning's curbside by designated locations by NYDEC staff.
- **Meetings & Conference Rooms:** Meetings will be held outside where possible; No meetings held indoors. Separate COVID-19 detailed guidance will be sent via email, as part of NSF's Health and Safety Process. Auditors have been notified that the NYDEC- COVID-19 policy and provided a copy to NSF staff and auditor.

Locations Included in the Certification

The land management activities and forestry offices in NY State Forests in Region 3-9, 2019. See map inserted below all activities and offices in Regions 1 & 2 excluded from the Green Certification program.





Appendix 2

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

6L741, NYDEC

Date of audit(s): Sept.22-23, 2020 (On site) Sept. 24, 2020 (Remote)

One Auditor on Project: Lead Auditor, Keri Yankus (KY)

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.

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

Audit Notes: NYDEC doesn't operate a 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*.

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

Audit Notes: Forest Management Plan (State Unit Management Plans=UMPs) are in place and most are up to date and one identified as behind schedule.

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).

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

Audit Notes: Reviewed management plans (Regions 6 & 5). Management plans for NYDEC include extensive sections a. thru i. Reviewed the "Strategic Plan for State Forest Management."

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

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

Audit Notes: An internal process, SFID, uses a 15-year rotation which is documented and used in UMP planning.



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

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

Audit Notes: September 10, 2015 SUNY College of Environmental Science and Forestry, Department of Forest and Natural Resource Management Report- "Difference between tree size, volume or any other forest characteristics is divided by the number of years involved between two measurements to get the periodic annual increment (PAI) (Avery and Burkhart, 2002)." "Periodic annual increment (PAI) was calculated for each of the forest stands selected for the final analysis (i.e. stands with at least two measurements excluding the ones with zero measurements for both measurements). Saw timber MBF yield increment over the years was used in PAI estimation using following equation:

$$PAI_{hi} = \frac{(Y_{hi2} - Y_{hi1})}{(t_{hi2} - t_{hi1})}$$

where

PAI_{hi} is PAI for stand i in stratum h , and

Y_{hi1} and Y_{hi2} are the yields for stand i in stratum h for years t_{hi1} and t_{hi2} .

A total of 1813 stands were subdivided into two or more smaller stands between first and second measurements. These stands are represented as split stands (table1) for this analysis. Weighted mean (weight = acreage) of the smaller subparts were calculated as an estimate of second measurement for these split stands which was then used as a second measurement in the PAI equation."

However, modeling results from the last Periodic Annual Increment (PAI) from 2015 in Region 3 shows stands with negative growth rates. This reflects stands declining in growth rate which may be attributable to mortality events, senescing stands, or other factors that contribute to apparent reductions in productivity. In follow-up interviews with modeling contractors it was determined that methods used to account for ingrowth and mortality in estimated periodic annual increments of stand volume growth or loss are not fully clear. Further, methods to validate quality of forest inventory, which serve as data source for growth, yield, and sustainability modeling are also not fully clear.

OFI: The system's prediction for growth levels is estimated to be well above actual and projected harvest volumes are conforming. Auditors therefore concluded that there is low- to no- risk of over-harvesting on a state-wide or Regional basis. However, it is unclear how DEC is accounting for potential impacts of growth and mortality which may affect desired stocking levels & how forest inventory data is being validated for modeling current and future efforts statewide.

2020: NYDEC examined the FIA data with USFS and how they analyze their inventory data at a 68% confidence interval (CI) and with a sampling intensity of 1 plot per ~ 6,000 acres. The total number of FIA plots on NYDEC certified acreage is 126 on ~ 797,000 acres, or 1 plot per ~ 6,300 acres. Roughly the same intensity as FIA sampling. NYDEC asked Eddie Bevilacqua Professor and Undergraduate Coordinator ESF SUNY Sustainable Resources Management University to develop a 90% CI for NYDEC data and found that the data was not statistically significant at that interval. NYDEC went back to professor & graduate students and asked them to develop a 68% CI for our growth-to-removal data to follow the national standards used by the USFS. Reviewed NYDEC e-mail correspondents with Eddie Bevilacqua Professor and Undergraduate Coordinator ESF SUNY Sustainable Resources Management, regarding analysis of NYDEC state's FIA data. Confirmed that the NYDEC is planning on updating the PAI calculation to further supplement the FIA data. A live Interview with Eddie Bevilacqua Professor and Undergraduate Coordinator ESF SUNY Sustainable Resources Management, confirmed that a dedicated student was assigned to continually work with the NYDEC however due COVID-19 which has limited work/travel for both NYDEC employees and Graduate students prevented continual work on being able to fully accomplish the project. It was determined process continues to be made which demonstrates that the NYDEC 2019 OFI is being addressed.



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

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

Audit Notes: Inventory is completed prior to the development of the unit management plan. Managers and field staff discussed the emphasis placed on inventory work. An internal process, SFID, uses a 15-year rotation. 2020: NYDEC examined the FIA data with USFS and how they analyze their inventory data at a 68% confidence interval (CI) and with a sampling intensity of 1 plot per ~ 6,000 acres. The total number of FIA plots on NYDEC certified acreage is 126 on ~ 797,000 acres, or 1 plot per ~ 6,300 acres. Roughly the same intensity as FIA sampling. NYDEC asked Eddie Bevilacqua Professor and Undergraduate Coordinator ESF SUNY Sustainable Resources Management University to develop a 90% CI for NYDEC data and found that the data was not statistically significant at that interval. NYDEC went back to professor & graduate students and asked them to develop a 68% CI for our growth-to-removal data to follow the national standards used by the USFS. Reviewed NYDEC e-mail correspondents with Eddie Bevilacqua Professor and Undergraduate Coordinator ESF SUNY Sustainable Resources Management, regarding analysis of NYDEC state's FIA data. Confirmed that the NYDEC is planning on updating the PAI calculation to further supplement the FIA data. A live Interview with Eddie Bevilacqua Professor and Undergraduate Coordinator ESF SUNY Sustainable Resources Management, confirmed that a dedicated student was assigned to continually work with the NYDEC however due COVID-19 which has limited work/travel for both NYDEC employees and Graduate students prevented continual work on being able to fully accomplish the project.

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

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

Audit Notes: Timber sale contract planting, reported numbers of acres tracked. Individual stand prescriptions reviewed.

Performance Measure 1.2

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

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

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

Audit Notes: Not evaluated this audit year.

- 1.2.2. Where a *Program Participant* intends to convert another *forest cover type*, an assessment considers:
- a. *Productivity* and *stand* quality conditions and impacts which may include social and economic values;
 - b. Specific ecosystem issues related to the site such as invasive species, insect or disease issues, riparian *protection* needs and others as appropriate to site including regeneration challenges; and
 - c. Ecological impacts of the conversion including a review at the site and *landscape* scale as well as consideration for any appropriate mitigation measures.

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

Audit Notes: Not evaluated this audit year.



Performance Measure 1.3

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

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

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

Audit Notes: NYDEC forest lands are not converted to other land uses.



Objective 2 Forest Health and Productivity

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

Performance Measure 2.1

Program Participants shall promptly reforest after final harvest. Indicators:

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Confirmed in 2020 that the organization didn't plant an exotic tree species.

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

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

Audit Notes: Observed on several active harvest in regions Region 6 that contractor and NYDEC foresters protected desirable or planned natural hardwood regeneration during the active harvests.

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

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

Audit Notes: No afforestation is being conducted.

Performance Measure 2.2

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

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.



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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Region 6 observed where field forester sprayed for Knotweed. Reviewed the Herbicide Application Plan – Knotweed patch in sale to be cut in Brasher State Forest (St. Lawrence- Region 6) Herbicide selected for use - Roundup Promax (EPA Reg No.524-579).

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

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

Audit Notes: Confirmed NYDEC foresters' current certifications as certified applicator in Region 6. Confirmed documented paperwork in forester field files. Confirmed foresters' state licensure is current.

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. of water quality or safeguards to ensure proper equipment use and *protection* of streams, lakes and other water bodies.
- h. appropriate transportation and storage of chemicals;
- i. filing of required state or provincial reports; and/or
- j. use of methods to ensure *protection of threatened and endangered species*.

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

Audit Notes: Not evaluated this audit year.

Performance Measure 2.3

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

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

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

Audit Notes: GIS data layer is checked with NRCS published soils maps and used in forest management activities.

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

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

Audit Notes: Active field sites visited. Confirmed that various levels of erosion control measures were used- water bars, cross drains, bridge installment, or corduroy of wet areas to minimize loss of soil and site productivity. See notes.



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

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

Audit Notes: Confirmed by field observations that post-harvest conditions reflect efforts to maintain site productivity.

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

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

Audit Notes: Confirmed by field observations that vigorous trees during various harvesting regimes were being retained.

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

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

Audit Notes: Confirmed by field observations at various active site visited that soil productivity was being protected in site preparation. Appropriate skid trail layout and buffers used to protect keys areas that identified different soil characteristics.

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

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

Audit Notes: Confirmed by field observations that road construction and skidding layout by foresters and contractors minimize impacts to soil productivity on several field sites visited. See notes.

Performance Measure 2.4

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

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

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

Audit Notes: Emerald Ash Borer are currently being monitored and there are concerns with EAB ash cover type. Observed in field site Region 6. Forest Field files capture information on status of EAB.

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

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

Audit Notes: Confirmed by field observations that forester is managing for forest condition and looking to minimize susceptibility to damaging agents. See 2.4.1.

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

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

Audit Notes: Pest Control - NYDEC foresters are monitoring for the following:

[Emerald Ash Borer \(EAB\)](#) - The Emerald Ash Borer (EAB) is a non-native insect that attacks all native species of ash trees.

[Gypsy Moth](#) - A non-native insect that, as a caterpillar, eats many different species of tree leaves.

[Hemlock Woolly Adelgid](#) - The Hemlock Woolly Adelgid is an invasive insect species from Asia that preys on hemlock trees by depriving the tree of vital nutrients.

[Spotted Lanternfly](#) - An invasive insect from Asia that feeds on 70 different plant species.

[Tent Caterpillars](#) - Forest Tent Caterpillar (*Malacosoma disstria*) and Eastern Tent Caterpillar (*Malacosoma americanum*).



Performance Measure 2.5

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

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

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

Audit Notes: State tree nursery provides the seedlings.



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

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

Performance Measure 3.1

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

Indicators:

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

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

Audit Notes: Foresters and contactors followed legal requirements and, in most instances, they implement BMPs during all phases of management operations.

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

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

Audit Notes: Observed during the audit that contract and BMP topics such as stump heights were being met or other BMP topics including water bars, contracts required NY trained logger for the life of active contact. Verified that the BMP field inspection forms were modified to capture status of NY Logger training for the loggers and contact provision language has been modified and is reviewed at Albany. Foresters' field files did have this documented information showing status of logger training or that they rechecked during the active period of the contact. BMPs were also being checked per the contract provisions in Region 6.

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

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

Audit Notes: Verified that the BMP field inspection forms were modified to capture status not only of NY Logger training for the loggers but other BMP attributes. Reviewed several revised BMP inspection forms. Observed good monitoring of overall BMPs in active and recently closed sales visited in the field in Region 6. Exceeds: Significant improvements have been made by field foresters to document in their "sale diary" projects file the status of each activity (Field notes & photos). This documented evidence is kept at regional level.

Performance Measure 3.2

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

Indicators:

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

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

Audit Notes: Observed during field site visits that stream side management zones are used to protect rivers, wetlands and other key water bodies. Region 6: 2 field sites visited great lengths with protection of known wetlands where an extended delineated buffer zones for the contractor. See notes.

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

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

Audit Notes: Observed during field visits in Region 6 water bodies clearly identified on the ground; harvest plans include mapped water bodies.



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

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

Audit Notes: Harvest plans incorporate protection of various water bodies. Observed where wetland was protected Region 6.

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

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

Audit Notes: NYDEC has plans to address wet weather events (Northeaster and Microburst). Foresters have identified wet weather tracts in each region visited.



Objective 4 Conservation of Biological Diversity

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

Performance Measure 4.1

Program Participants shall conserve biological diversity. Indicators:

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: A database that predicts sites that may include rare species and communities (PRO) is being used during the planning process. DEC staff described training they received in using the natural heritage and PROs layers. Foresters described process for investigating occurrences:

- Checked for and found occurrence on GIS Pros layer.
- Look up guidance and descriptions.
- Analyzed and evaluated site potential for actual occurrences.
- Field technicians communicated in the field they had field training to help with visually identification of significant species of concern.



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

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

Audit Notes: NYDEC foresters identify non-forested areas including bogs, fens of ecological significance in the field. This information is noted in the Pro's GIS data layers. Some field information is also captured in the field file folders which is a significant improvement.

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

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

Audit Notes: Demonstrated management of an invasive species such as EAB.

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

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

Audit Notes: Not evaluated this audit year.

Performance Measure 4.2

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

4.2.1. Program to protect threatened and endangered species.

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

Audit Notes: UMPs. NYDEC Foresters check the Natural Heritage database and protect threatened and endangered species. Confirmed in field site visit. Documented information: Classification and Management of High Conservation Value Forests (HCVF) and Representative Sample Areas (RSA) On State Forests Regions 6 & 5.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.



Performance Measure 4.3

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

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

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

Audit Notes: Foresters interviewed reported the systematic use of the heritage database and consultation with Natural Heritage staff. Natural Heritage staff in the central office also confirmed that foresters will submit possible field observations for consideration. Foresters interviewed confirmed previous field training and future scheduled trainings.

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

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

Audit Notes: Field visit confirmed that the forester identified and took GIS data points of the ecologically important site. Observed in the field it was protected and was mapped Region 5.

Performance Measure 4.4

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

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

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

Audit Notes: FECV and biodiversity are now itemized in an inventory system by different categories in a natural heritage data base. Staff is now providing field input. The HCVF types (Rare Community, Special Treatment Area and Watershed Protection Areas). This symbolized is defined by the individual user and be changed.

Rare Community is in red.

Special Treatment Area is in purple.

Watershed Protection Areas are in blue hatched pattern.

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

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

Audit Notes: **OFI**: Although the system is conforming, there may be an opportunity to improve and enhance the incorporation of research results into future forest management (UMP) decisions. Department's Conservationist publication (June 2019) pertaining to staff research & monitoring efforts on Eastern white pine decline; White Pine Needle Damage (WPND) & EAB.



Objective 5 *Management of Visual Quality and Recreational Benefits*

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

Performance Measure 5.1

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

5.1.1. Program to address visual quality management.

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

Audit Notes: Field observation confirmed that visual quality considered in the field management. Region 6 field foresters painted trees with brown paint to visually remove graffiti that was identified by Ranger at recreation site. Increase of visitor activities due to Covid 19 has presented challenges with field foresters and Rangers. Visited field sites in Region 6 visual aesthetics was considered in the harvesting planning.

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

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

Audit Notes: Field observations confirmed that there are aesthetic considerations in harvesting, road and landing design. Recreational management includes visual considerations associated with access to cemeteries and unique features.

Performance Measure 5.2

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

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

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

Audit Notes: Not evaluated this audit year.

5.2.2. Documentation through internal records of clear-cut size and the process for calculating average size.

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

Audit Notes: All sales are entered into SFID. Clear cut acreage and size figures are compiled and calculated by querying the data from SFID in Central Office. Reviewed the spreadsheet for FY 2019-2020.

Performance Measure 5.3

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

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.



Performance Measure 5.4

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

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

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

Audit Notes: Recreational sites visited during the audit- Observed an informational Kiosk at recreational trail head in Region 6 Potsdam. These recreational opportunities for the public continue to play a key role to help increase of public awareness. Field foresters and Ranger communicated to the auditors that this year was significant high use by the public driven by Covid 19 pandemic.



Objective 6 Protection of Special Sites

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

Performance Measure 6.1

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

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

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

Audit Notes: Received documented email information from the state archeologist and confirmed through SHPO – required database information mapped and stakeholder consultation in identifying or selecting special sites for protection is noted in the on-line data base. Field visit of 2 historical foundations in Region 5.

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

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

Audit Notes: Archaeological inventories maintained by the New York State Museum and Office of Parks, Recreation, and Historic Preservation are searched prior to site altering activities for identification/location of protected cultural resources on or near management units. “The term cultural resources encompass a number of categories of human-created resources including structures, archaeological sites and related resources. The Department is required by New York State Historic Preservation Act (SHPA) (PRHPL Article 14) and SEQRA (ECL Article 8) as well as Article 9 of Environmental Conservation Law, 6NYCRR Section 190.8 (g) and Section 233 of Education Law to include such resources in the range of environmental values that are managed on public lands.”
UMPs also identify known locations. Checked this process in the field.



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 Conformance Exceeds O.F.I. Major NC Minor NC

Audit Notes: Not evaluated this audit year.



Objective 8 Recognize and Respect *Indigenous Peoples'* Rights

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

Performance Measure 8.1

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

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

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

Audit Notes: Reviewed the written documented policy CP-42 "Contact, Cooperation, and consultation with Indian Nations". Commissioner Policy-42 outlines the Departments obligations and responsibilities as they relate to Indian Nation consultations and involvement in the UMP planning process and this policy is available on NYDEC internal website called In-Site.

Reviewed Memorandum dated 11/15/2017 RE: UMP Development and Department Consultation with Indian Nations. "Communication between the Department and Indian Nations should be direct and involve two-way dialogue and feedback. Regional staff should contact the appropriate tribal representatives in the UMP planning area at the same time that a public scoping session is scheduled. When possible and where appropriate, staff should facilitate an in-person meeting with tribal representatives to involve them in the planning unit management planning process. Where an in-person meeting is not feasible, the preferred method of engaging the Indian Nations is via a phone call. **Letters and emails are not preferred communication methods"**

OFI: Statewide: Although the system is conforming, there may be an opportunity to re-check current wording expectations as stated in the Memorandum to how organization is currently communicating with Indian Nations.

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:

- understand and respect traditional forest-related knowledge;
- identify and protect spiritually, historically, or culturally important sites;
- 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
- respond to Indigenous Peoples' inquiries and concerns received.

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

Audit Notes: NYDEC policy, *Contact, Cooperation, and Consultation with Indian Nations (CP-42)*, requires that the NY DEC undertake good faith efforts to consult with Indigenous Peoples on any Department decision or action which could foreseeably have Indigenous Peoples' implications. Auditors reviewed the documents provided. Interviews with staff confirmed new procedures were understood and being implemented at the field level. Interviewed new UMP coordinator who serves as initial point of contact for field staff (POC) for pursuing Indigenous Peoples' consultations. Confirmed several examples of contacts already made by local UMP planners for this purpose. POC then confirms with NYDEC staff Native American Tribe Coordinator for additional guidance, as needed. Evidence for full implementation was given for 2 UMPs during the 2018 audit, the Salmon River and Draft Onondaga UMP. Although the NYDEC is still working out details for a simple checklist to assist UMP planners, the new procedures were distributed, and the immediate implementation of the new procedures is enough. FY 19 Auditor checked newly implemented tracking mechanism where communication occurs prior to and during the UMP process. NYDEC attended a training with local indigenous People to better understand and respect traditional forest-related knowledge. Confirmed through interviews.

2020: Interviewed & reviewed email 10/2/2020 from Indian National Affairs Coordinator, Office of Environmental Justice- NYDEC located in Buffalo NY. Confirmed Saint Regis Mohawk Tribe (SRMT) UMP letters were disturbed. The Native Tribe contact confirmed that they have been getting the NYDEC UMP outreach letters and appreciate the efforts, but they are overworked and short staffed to respond. NYDEC regional staff communicate by letters being sent out to tribes in their regions 6 & 5. Reviewed the UMP outreach files.



Performance Measure 8.3

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

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

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

Audit Notes: NYDEC is a state land agency and doesn't own or manage private lands.

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

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

Audit Notes: David E. Witt, Ph.D., Indian Nations Affairs Coordinator, Office of Environmental Justice manages, responds to inquiries and concerns received. This was confirmed through email.



Objective 9 Legal and Regulatory Compliance

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

Performance Measure 9.1

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

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: FY 20 Field visits on active harvests confirmed necessary permits. NYDEC Albany office in process of meeting the required EPA air requirements by communicating and tracking contractor vehicle use on state lands project has been impacted with Covid 19 work restrictions.

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

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

Audit Notes: FY2020: **EXTENDED MINOR CAR:** While a plan to address this is beginning, this has not been implemented. COVID-19 has limited work/travel that NYDEC employees have been able to accomplish, therefore this is not upgraded, and the Minor CAR is extended from FY 2019 audit report to the 2020 audit report.

FY 2020: Site visit- Moon Pond State Forest, Sharrett Road - Auditor reviewed several emails that detail the issue related to the Sharrett Road, in the Town of Ellensburg. NSF auditor visited this on site where recent road work was done without required permits and multiple issues were identified by NYDEC staff. NYDEC staff communicated they are in process working with the town of Ellensburg to try and bring them into compliance regarding this recent road. Reviewed emails with documents that involves the Senior Project Manager NY District Corps of Engineers, Regulatory Branch 1 Buffington St, Bldg. 10, 3rd Fl. North, Watervliet, NY 12189.

Reviewed document: "New York State Department of Environmental Conservation Notice of Incomplete Application - This is NOT a Permit Application ID: 5-0936-00128/00001 Batch Number: 863418 Facility: Sharrett Road Work Sharrett Rd 0.5 M S of McCoy Rd Ellensburg, NY Applicant: ELLENBURG- T Owner ID: 30305 BOX 93 ELLENBURG DEPOT, NY 12935-0093 Permit(s) Applied for: 1 - Section 401 - Clean Water Act Water Quality Certification Project Location: in ELLENBURG in CLINTON COUNTY".

Reviewed documented letter: "DEPARTMENT OF THE ARMY US Army Corps of Engineers, ATTN: CENAN-OP-RU Upstate Regulatory Field Office 1 Buffington St., Building 10, 3rd Fl. North Watervliet, New York 12189-4000 PLEASE USE THE ABOVE 18-CHARACTER FILE NUMBER ON ALL CORRESPONDENCE WITH THIS OFFICE VIA ELECTRONIC MAIL ONLY Upstate New York Section SUBJECT: Permit Application Number NAN-2020-00858-UCO by Ellensburg, Town" dated August 27, 2020.

NYDEC Supervising Forester, Division of Lands and Forests participating in the audit communicated to NSF auditor that they had a timber trespass on Jefferson7, Gould Corners State Forest.

FY 2019: Confirmed through field visits that organization is committed to legal compliance and voluntary BMPs and wetland permit through multiple TRP field visits. Confirmed in the field that the TRP document is shared with multi agencies and is in the very early stages of the lean process. NYDEC Lands and Forests central office confirmed a draft memo was created however, it's unclear how the central office plans to deploy this memo to all field staff regarding changes to the TRP & changes made to the procedures. Minor NC issued.

Illegal ATV activity on Chenango RA #15 in the Town of Afton, Chenango County. This issue was observed during NSF audit. L&F Foresters started to install cameras as an immediate correction during the audit to collect date/time data of activities and will share this information with NYDEC Rangers who deal with legal compliance.

"Consent Order by our Region 3 Regional Attorney to address illegal activities the neighbor was involved with on State Forest lands including dumping and illegal pesticide use. Potential causes include lack of knowledge on part of the perpetrator of existing Environmental Conservation Laws regarding: 1) permitted uses of NYSDEC State Forest lands; 2) pesticide use, registration and appropriate licensing needed to apply restricted use pesticides



legally in NYS, and 3) disposal of solid waste. The case was referred to our regional Office of General Counsel with numerous infractions of Environmental Conservation Laws related to State Forest Lands, Pesticides and Solid Waste. A meeting to discuss a Consent Order crafted to resolve the violations was held with the neighbor and his lawyers on 12/10/18. A consent order was signed on 12/11/18 outlining the penalties the perpetrator is responsible for. Communication with regional staff on 9/6/19 confirm that fines have been paid and illegal dumping has been removed.”

Performance Measure 9.2

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

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Confirmed there were no ILO-related complaints via Emails from NYDEC Aug 2018, Sept. 2019 & July 23, 2020.



Objective 10 Forestry Research, Science and Technology

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

Performance Measure 10.1

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

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

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

Audit Notes: Confirmed involved in the State SIC.

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

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

Audit Notes: Not evaluated this audit year.

Performance Measure 10.2

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

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

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

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

Audit Notes: Not evaluated this audit year.

Performance Measure 10.3

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

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

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

Audit Notes: NYDEC is involved in the SFI State Implementation Committee.

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

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

Audit Notes: Not evaluated this audit year.



Objective 11 Training and Education

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

Performance Measure 11.1

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

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Personnel and contractors are required to be appropriately trained: foresters have college degrees (associate degree or BS degree in forestry); harvest contractors have NY Logger Training. FY18 Confirmed in an email that the Central office sent out webinar notices and other emails that were forwarded to regional staff over the past year letting them know about education/training opportunities. FY 2018 Field interviews confirmed several foresters actively took the field classes with the NE Silviculture Institute. FY 2019 Region 3 confirmed training of a forester. FY 2020 Regions 6 & 5 confirmed training of foresters.

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

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

Audit Notes: Contractors on active sale. Information was documented in the project files and they were current with NY logger training.

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

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

Audit Notes: Region 6: Revenue and local sales agreements include this requirement.



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:
- awareness of sustainable forestry principles and the SFI program;
 - best management practices, including streamside management and road construction, maintenance and retirement;
 - reforestation, invasive exotic plants and animals, forest resource conservation, aesthetics and special sites;
 - 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);
 - awareness of rare forested natural communities as identified by provincial or state agencies, or by credible organizations such as NatureServe, The Nature Conservancy, etc.
 - logging safety;
 - 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;
 - transportation issues;
 - business management;
 - public policy and outreach; and
 - awareness of emerging technologies.

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

Audit Notes: Confirmed involvement in the New York SFI Implementation Committee.

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

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

Audit Notes: NYLT TLC requirements in Notice of Sale. Confirmed language change FY 2018, FY 2019, & FY 2020.

- 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:
- completion of *SFI Implementation Committee* recognized logger training programs and meeting continuing education requirements of the training program;
 - independent in-the-forest verification of conformance with the logger certification program standards;
 - 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*;
 - use of *best management practices* to protect water quality;
 - logging safety;
 - compliance with acceptable *silviculture* and utilization standards;
 - aesthetic management techniques employed where applicable; and
 - adherence to a management or harvest plan that is site specific and agreed to by the forest landowner.

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

Audit Notes: NYDEC participates in the New York SFI Implementation Committee meetings that are generally held quarterly.



Objective 12 Community Involvement and Landowner Outreach

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

Performance Measure 12.1

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

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

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

Audit Notes: Confirmed active and financial support in the SFI implantation committee.

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

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

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

Audit Notes: Not evaluated this audit year.

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

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

Audit Notes: Not evaluated this audit year.

Performance Measure 12.2

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

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

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

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

Audit Notes: Different Forestry staff cover a) b) and d) throughout the year. C) visited self-guided trail head kiosk during the audit. Intra agency collaboration on kiosks is with the office of communications central office outreach which encourages to check website of each state forest which is linked to the Unit Management Plan (UMP).



Performance Measure 12.3

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

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

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

Audit Notes: Checked and no known 1-800 complaints on the NYDEC. Confirmed support of the NY SIC.

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

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

Audit Notes: This support is provided through the NY SFI Implementation Committee.



Objective 13 *Public Land Management Responsibilities*

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

Performance Measure 13.1

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

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

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

Audit Notes: The UMP process includes opportunities for the public to comment.

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

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

Audit Notes: 2020: Visited TRP in Region 5 see field notes. Appropriate contact and implementation of the TRPs with independent collaborators needs to occur in order to prevent unauthorized activities occurring on the Forest Management Units.

2018 NC: It was discovered that the permit terms requiring 48 hours' notice to designated NYDEC staff is not always followed, nor is the failure to notify enforced by staff. At the site "R5: Peck Hill State Forest Willie Marsh and UNH Beech Research TRP", it was found that a cooperating educational institution, for whom a TRP had been issued for research purposes, failed to notify the NYDEC forester before commencing activities which resulted in incorrect trees being impacted, essentially an unauthorized activity occurring on the site. During follow-up interviews with staff, it was determined to be relatively common for this notification requirement to be omitted by permittees, and that there was no enforcement by NYDEC staff when such omissions occur. As a documented requirement within the TRP, lack of compliance with the 48-hour notification constitutes a lack of authorization to conduct work or proceed with activities as specified by the TRP. This requirement for 48 hours' notice was described as supporting public safety goals and ensuring any specific permit conditions that may apply towards preventing unauthorized activities. This does not result in a fundamental failure of forest protection activities which justifies the grading of this finding as a Minor NC. **Resolved:**

Slow progress has been made addressing TRP. Reviewed the documented email from the region 5: The policy allows staff to take necessary action, at their discretion, when the terms of a TRP are not complied with. In this case, staff did not require corrective actions or site restorations because they did not feel it was necessary as there were no real impacts to resources warranting remediation (the TRP holder killed the "wrong" beech trees). DEC Policy ONR-3 (Temporary Revocable Permits for State Lands and Conservation Easements) states "Routine and Non-Routine TRP permittees shall be directed to notify the Regional Manager at least one (1) week prior to commencing an activity permitted under a TRP and upon completion of such activity, except for those activities scheduled to occur on a specific date." After some discussions, NYDEC concluded that there are some activities that require TRPs but may not require prior notification before the activity takes place. NYDEC Division of Forest and Lands decided to remove this term from the "Standard Terms and Conditions" boilerplate language. If regional staff feel it is necessary, at their professional discretion, to require notification they may put that term in the "Special Terms and Conditions". A draft memo confirmed that it's in process and has not been communicated out to the staffing in all the regions. Reviewed the drafted final Internal audit did cover TRPs. Interviewed Forest Preserves Forester. This interview and documented evidence confirmed that State is in process of Lean project since multiple departments use this process beyond the Division. Example (Forest Preserves which is not in scope of certification). Closed CAR; however, NSF auditor opened a new CAR. See audit report.



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 Conformance Exceeds O.F.I. Major NC Minor NC

Audit Notes: Included in the template for NSF's audit report; NSF provides the summary report within the audit report; report must be sent to SFI, Inc.

Performance Measure 14.2

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

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

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

Audit Notes: Confirmed that the SFI progress report survey was completed for 2020.

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

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

Audit Notes: Most of the information for the categories of information needed for SFI annual progress reports is contained in the NYDEC GIS and spreadsheets.

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

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

Audit Notes: Reviewed the SFI 2017, 2018, 2019& 2020 SFI annual progress report.



Objective 15 Management Review and Continual Improvement

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

Performance Measure 15.1

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

Indicators:

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

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

Audit Notes: The system consists of day-to-day work by the Certification Coordinator, monthly reports to the Bureau Chief, discussions during conference calls with the regions, annual reports, and various meetings with managers.

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

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

Audit Notes: 2020: Drafted Memo report for Central Office, 2020 Drafted Audit results Central Office.
2020 Drafted Cortland Internal Audit Report, 2020 Draft Lowville Internal Audit Report.

Collecting, reviewing and reporting information to management did take place in the 2020 Statewide Internal Audit Report. Reviewed the detailed internal management review and outcomes of the audits listed above.

2019: The 2019 Bureau of Forest Resource Management Internal Audit (IA) occurred between July 9 - 11, in the Region 6 Herkimer sub-office (Crew 1) and July 16 - 18, in the Region 4 Stamford sub-office (Crew 2). Several OBS were noted and 1 minor nonconformance.

The 2018 Bureau of Forest Resource Management Internal Audit (IA) occurred between July 9 - 11, in the Region 7 Sherburne sub-office (Crew 2) and July 16 - 18, in the Region 9 Dunkirk sub-office (Crew 1). IA Crew 1 and Crew 2 audited each Region.

NYDEC Internally audited the Potsdam and Schenectady offices 2017 year.

The past internal audits from 2013 -2016 are:

Year	Internal Audit Locations
2016	R3 (New Paltz), R5 (Warrensburg)
2015	R7 (Altmar), R8 (Bath)
2014	R7 (Cortland), R9 (W. Almond)
2013	R4 (Stamford), R6 (Lowville)

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

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

Audit Notes: Annual review of progress by management and determination of changes and improvements was completed in the 2017-2018-2019-2020 statewide internal review.

(End)



Checklist for Section 9, Appendix 1: Audits of Multi-Site Organizations

3. Terms and Definitions

- 3.1 Organization:** The term organization is used to designate any company or other organization owning a management system subject to audit and certification.
- 3.2 Site:** A site is a permanent location where an organization carries out work or a service.
- 3.3 Multi-Site Organization:** An organization having an identified central function (hereafter referred to as a central office – but not necessarily the headquarters of the organization) at which certain activities are planned, controlled or managed and a network of local offices or branches (sites) at which such activities are fully or partially carried out.
- 3.4 Group Certification Organization:** A specific type of multi-site organization where forest owners, forest owners' organizations, forest managers, forest products manufacturers or forest products distributors without a pre-existing legal or contractual link can form a group for the purposes of achieving certification and gaining eligibility for a sampling approach to certification audits.

For audits of conformance with SFI Section 4 in the SFI 2015-2019 Standards and Rules document, multi-site organizations using either IAF-MD1 or alternate approaches to sampling shall ensure that all the relevant sites (including the central function) are subject to the organization's internal audit program and shall have been audited in accordance with that program prior to the certification body starting its assessment. (Section 9, Requirement 4.1.5 Audit Procedures)

Note: Communicate with NSF Project Manager to confirm.

Yes No N/A

Audit Notes: Confirmed with the NSF Project Manager that this is a multi-site client.

4.1 Eligibility Criteria / Method of Sampling (choose 1)

- Eligibility criteria established in IAF-MD1: **Use Sub-Checklist 9-1-A** below.
- Alternative Approaches to sampling provided for in Section 9, Subsection 5.2 of the Audit Procedures and Auditor Qualifications and Accreditation document: **Use Sub-Checklist 9-1-B** below.
-



Sub-Checklist 9-1-A: Eligibility Criteria Established in IAF-MD1

Applicable Not Applicable

4.1.1 Multi-site organizations using IAF-MD1 as the basis for sampling shall meet the eligibility criteria established in IAF-MD1, including, but not limited to, the following:

a. The processes at all sites have to be substantially of the same kind and have to be operated to similar methods and procedures.

Yes No N/A

Audit Notes: All sites are wholly owned by NYDEC which is a state agency. All the sites operated to similar methods and procedures.

b. The organization's management system shall be under a centrally controlled and administered plan and be subject to central management review and all relative sites (including the central administration function) shall be subject to the organization's internal audit program.

Yes No N/A

Audit Notes: Albany office oversees the Green Certification Program. This central office conducts an annual management review of all relative sites. Reviewed the recent drafted internal audits for FY 2020. This year the Albany office was included in the sampling for multisite requirements.

c. It shall be demonstrated that the central office of the organization has established a management system in accordance with the SFI 2015-2019 Standards and that the whole organization meets the requirements of the standard.

Yes No N/A

Audit Notes: NYDEC demonstrated that the central office (Albany) has established a management system to meet the requirements of the SFI Standard. The regions visited in the sampling (Regions 3 & 5 for 2017) and (Regions 7 & 9 for 2018) (Regions 3, 4 & 7 for 2019) meet the requirements of the Standard.2020:(Central Office- Albany, Region- 7 Cortland and Region 6- Lowville).

d. The organization should demonstrate its ability to collect and analyze data (including, but not limited to, the items listed below) from all sites including the central office and its authority and also demonstrate its authority and ability to initiate organizational change if required:

- i. System documentation and system changes;
- ii. Management review;
- iii. Complaints;
- iv. Evaluation of corrective actions;
- v. Internal audit planning and evaluation of the results;
- vi. Changes to aspects and associated impacts for environmental management systems and
- vii. Different legal requirements.

Yes No N/A

Audit Notes: Multi-site criteria IAF=MDI 4.4.1 d) IV as it relates to "Internal Audit Team Charter and Internal Audit report". Confirmed that the organization now considers previous topics and includes in current year review.

5.1 Sampling Approaches

5.1.1 Certification bodies auditing multi-site organizations using IAF -MD1 as the basis for sampling shall meet the sample selection and intensity criteria established in IAF -MD1. (Note: The Sampling requirements under IAF-MD1 are provided below in italics and using the numbering system from IAF-MD1)

Yes No N/A

Audit Notes: Based on a review of the applicable Sampling Requirements under IAF-MD1 as detailed below, the organization meets the sample selection and intensity criteria for MD1. Albany (central office) and various regions are audited each year.

(END Sub-Checklist 9-1-A: Eligibility Criteria Established in IAF-MD1)



NYDEC 2019 Audit Field Notes

22 September 2020 Region 6

Opening Meeting (brief meeting held outside -recreation site) Region 6

(Total number of field sites to visit has been reduced due to COVID-19 health and travel considerations, reducing the interactions between staff and auditors on-site and allowing sufficient time to conduct remote (interviews (phone/Cisco WebEx/etc.) with staff and stakeholders while on-site for the audit.)

Field Sites

1. Greenwood Creek State Forest TX11714 (Active Sale)

91 acres- UMP: St. Lawrence Rock Ridge- Forest Ranger communicated to the group adjacent is 5 camp sites. NYDEC Foresters and Rangers are dealing with an increase of trash, graffiti on trees and illegal ATV usage increased due to Covid 19 Pandemic. Observed painted trees where the NYDEC field foresters covered up graffiti. Walked on an old skid trail- harvest adjacent to designated trout stream- arch culvert. Beech trees were hacked and squirt with Rodeo chemicals for beech management completed by a trained licensed contractor. A 100-foot buffer to the RSA- Maple and Basswood, Ash and Sugar Maple. 12 acres were harvested for Beech. Natural Heritage data base identified: Southern Twayblade, Maple-Basswood rich mesic forest. SF PRO: Eastern Pearl shell. Observed snags and cavity trees left to help deal with CWD deficiencies.

2. Brasher State Forest X01860 (Tree Planting Site)

Approximately 120 acres. Foresters had extra seedlings for the state nursery. They planted 110 Red Oaks which were flagged in the field. The seedlings were planted in a random pattern based on the canopy opening from the harvest. Foresters will continue to monitor seedling health and note in forester diary. Observed that it was a seed tree harvest natural regeneration was observed in woods. Fabric and corduroy were used on the skid trail to protect soil disturbance and help with BMP management. Observed the marked boundary of the sale for the state which is adjacent to private property.

3. Brasher State Forest X01860 (Completed/closed out)

Approximately 46 acres. Field foresters discussed how they increased the no cut buffer zone to help wildlife habitat for Blanding's Turtle at the site. Significant wetland observed in the field. This species is NY State Threatened. Species to be harvested: WP, RP, WA, BC, SM and HM, sawtimber species was Hemlock pulpwood, Pine Pulp, and hardwood pulpwood. Skid trails and landings appropriately sized- this is in a multiple use area for recreation- Foresters had the contractor install significant berms to discourage any ATV usage onto the closed-out sale. No issues.

4. Brasher State Forest TX11421 (Completed/closed out)

Revenue Sale St. Lawrence UMP RA#6 D-6,9.1,9.2.10.1 and 10.2 Observed stone walls on the recently closed out harvest. Stone walls were protected and not breach by the logging equipment. Scotch Pine overstory removal. Plan for natural regeneration per the prescription. Also, intermediate commercial thinning. Recreation Multiple Use trail through harvest. This sale is with the Federal Emerald Ash Borer EAB quarantine. Buckthorn 1" to 6 "DBH shall be cut as part of the sale. Reviewed the Sand Diagnosis and prescription. Special resource noted Federal Wetland. Observed in the field that the foresters had it marked and significant buffer was left. Observed rutting in the skid trail however field forester noted in field notes and already had addressed it with the contractor. Water bars installed per NY BMP- no issues noted.

5. Brasher State Forest Scarlet Indian Paintbrush (HCVF)

Designated Endangered in NY and ranked S1 by the NY Natural Heritage Program. Located on a mowed right of way. Discussion occurred in the field on how foresters manage the HCVF. The HCVF is monitored with annual checks visually and noted in forester files. This species was also confirmed by the Natural Heritage Staff out of the Albany office.

6. Brasher State Forest Whorled Mountain-Mint (HCVF)

Observed roadside- was identified by a previous forester in the region. It was confirmed by the Natural Heritage staff out of Albany office. This is an Endangered species in NY. State Conservation rank S1S2 and Global Conservation Status Rank of G5T5. A management strategy is mowing, and clearing done after the growing season. NYDEC works with the road crew to ensure proper management occurs. Leaf strong mint fragrance.



7. Brasher State Forest TX11965 (Inactive Sale)

St. Lawrence UMP -RA#6(Stands C25, C26, C27, C39.1, C39.2) about 98 Acres with about estimated 166.7MBF Sawtimber and estimate of 579 cords of pulpwood. This is a Revenue sale recently to sold to Way Timber Harvesting NY Logger trained. Red Pine and White Pine regeneration. Overstory removal prescription. Observed that Sale tree and Skid road marked in Blue Paint. Sale Boundaries observed in the field were marked 3 blue stripes. Wetland Boundaries marked by 2 blue stripes. No cut buffer established for the Blanding Turtle Habitat that was identified in the forester project files. Observed trash at the landing- tires. Forest Ranger was notified as they conduct the investigation and enforcement. Field foresters identified Knotweed at the landing and did a chemical injection Roundup Promax (EPA Reg. No. 524-579). NYDEC field forester will continue to monitor the kill rate and based on field observations determine future applications if needed.

23 September 2020 Region 5

1. The Gulf Unique Area CP-3 Access, Trailhead and Civil War Veteran Home Site

The Gulf Unique Area is named for the steep rocky gorge, or "gulf", cut by ice age flooding. The area is especially popular for hiking and bird watching. NYDEC explained there are three miles of marked hiking trails. Main attraction is birding/wildlife viewing because it so remote and is a destination for non-motorized recreation. Walking to the historical/cultural site was almost on the US/Canada border. Observed 2 historically and culturally significant stone foundations. They are appropriately protected in the management area. Limited forest management occurs due to its remoteness. No issues noted.

2. Moon Pond SF Road maintenance

NYDEC foresters described to auditors the status of the road at Moon Pond State Forest. In the spring of 2020, the Town of Ellensburg undertook numerous improvements to the Sharrett Road on both State and private land. The work was done following a court decision that the road was a Town road, and it was to be maintained by the Town. The work was completed without any permits. At a minimum, the Town was required to acquire APA wetland permitting, ACOE permitting and a TRP from NYDEC Lands and Forest. NYDEC tried numerous times to communicate with Town and is documented in the Moon Pond SF Sharrett Road Inspection Report which was reviewed by NSF auditor. Inspection Report states the following: "June 25th, 2020, a site inspection was performed by L&F and APA in response to a previous Forest Ranger inspection. The June 25th inspection revealed five locations along the Sharrett Road that need possible remediation. Four of these sites are culvert installations and one is the development of a parking area, on private land, in APA delineated wetlands. In addition to the remediation needs, numerous trees on State land were cut, stumps removed, and debris (steel reinforced concrete) deposited on State lands". Foresters also documented evidence by taking photos and placing in inspection report. Auditors observed numerous issues in the field however it was also observed the organizations is working on trying to resolve numerous issues and deal with

3. Chazy Highland SF Wilfred King Road access and camping (Bicknell Thrush Habitat, remote viewing)

Hiked into the site Wilfred King Road access and camping and heard the history of how this site was established by the prison system

4. Terry Mt. SF Access Road TRP #2788 Essex Co. Emergency Services (WPTZ Tower Access)

April 23, 2020 letter to Essex County Emergency Services NY State Dept. of Environmental Conservation's (Department) Temporary Revocable Permit Policy (ONR-3), Region 5 issues a Temporary Revocable Permit. This permit allows the organization to grade and fix the access road to the Essex County Tower Site. Discussion while visiting this site was the following: replacing gravel to fix washouts, repairing, and replacing existing water bars at locations designated on the map. Terms and Conditions and legal requirements such as "certificate of liability insurance".

6. Terry Mt SF Mud Pond VSA Mastic Family Farm VSA, Mud Pond Trail and Campsite

Stewardship Agreement Number: 19-05-RB-05- Project: Mud Pond Road Maintenance- DEC Land unit: Terry Mountain State Forest. Agreement runs from June21, 2019 thru June 20, 2020. 1-year renewal up to 5 years. Activities that can occur are the following: Removal of fallen trees or tree limbs from the Mud Pond Road b) other maintenance of the Mud Pond Road in the Terry Mountain State Forest. All work must be approved in writing by the Regional Forester or their designee. Agreement Signed by the Regional Director-Family member stopped to ask the NYDEC what was happening- NYDEC field reminded them that the NYDEC was going through 3rd party audit. Family member was happy to observe the process from a social distanced on an ATV. Discussion occurred that this was an active snowmobile trail -Observed the state gate and signage to the forest. Recreation site off the maintained access road and parking area. Confirmed nearby 2 confirmed cases of EAB. No issues noted.



24 September 2020

Discussed the following topics Albany Office:

Dave Witt, DEC Indian Affairs Coordinator.

Eric Kasza, DEC Forester 3, involved with the LEAN process regarding our Temporary Revocable Permit (TRP) program.

Rob Davies, DEC Division of Lands and Forests Director & Peter Innes Assistant Division Director. Topics discussed changes in organization, legal issues, & restrictions of travel with Covid 19 and staffing/budgets.

Eddie Bevilacqua, SUNY ESF Professor, involve with calculating the NYSDEC Periodic Annual Increment (PAI) as well as analyzing NY's USFS-FIA data.

Audit trail documents from the 2 Regions visited.

Closing meeting.



Appendix 3

New York State Department of Environmental Conservation (NYDEC) 2020 SFI Forest Management Public Summary Report

Introduction

The Green Certification Program of the New York State Department of Environmental Conservation (DEC), Division of Lands and Forests, Bureau of State Land Management (BSLM) has demonstrated conformance with the SFI 2015-2019 Standard and Rules, Section 2 – Forest Management Standard, and multi-site requirements in IAF-MD1 according to the NSF Certification Process.

The DEC Division of Lands and Forests is responsible for New York's extensive system of forest preserves, support for good management of private lands, real property services including handling property conveyances for varied categories of lands (fee and easement), and the management of State Forests. The DEC Green Certification Program is managed by Josh Borst, Green Certification Coordinator. The Division and Bureau are incorporated within the DEC, run by an appointed DEC Commissioner. Appointees with direct line authority over the implementation of land management programs also include two Deputy Commissioners and 7 Regional Directors.

Under the New York State Department of Environmental Conservation (DEC) Commissioner Basil Seggos, the main offices with decision making responsibility, planning and direction for the management of State Forests within the scope of this review are outlined below:

- 1) Office of Natural Resources – Vacant, Deputy Commissioner
 - a. Division of Lands and Forests – Robert Davies, Director
 - i. Bureau of Forest Resource Management – Robert Messenger, Chief
 1. State Forest Section – Barbara Lucas-Wilson, Section Chief
 - a. Green Certification Coordinator – Josh Borst

Additional resources and administrative assistance for State Forest management may also come from the following Offices, Divisions and Bureaus as listed and explained below:

- 2) Office of Natural Resources – Katie Petronis, Deputy Commissioner
 - a. Division of Lands and Forests – Robert Davies, Director
 - i. Bureau of Real Property – Robert A. Burgher, Superintendent
(Responsible for land acquisition program and conducting land surveys)
 - a. Natural Resources 3-9 – Natural Resource Supervisors
 - i. Bureau of Forest Resource Management
 1. Forestry 3-9 – Regional Forester
 - a) State Land Foresters
(Regional supervision of State Land Foresters)
 - b. Division of Fish and Wildlife – Tony Wilkinson, Director
(State Foresters rely on this Divisions expertise when developing policy and management decisions)
- 3) Regional Affairs – Christian Ballantyne, Assistant Commissioner
 - a. Region 3-9 – Regional Directors
 - i. Natural Resources 3-9 – Natural Resource Supervisors
 1. Forestry 3-9 – Regional Forester
 - a. State Land Foresters
(Regional supervision of State Land Foresters)
 - b. Division of Forest Protection – John Solan, Acting Director
 - i. Forest Rangers by Region
(Responsible for enforcement of the Environmental Conservation Law on State Forests)
- 4) Office of Administration – Jeffrey Stefanko, Deputy Commissioner
 - a. Division of Operations – Doug Bernhard Director
 - i. Bureau of Maintenance & Technical Services – Andrew Niles, Chief
(Perform construction and maintenance on State Forests as requested by the State Land Foresters and develop policy/technical specifications for bridges, and dams.)

“The Division’s other three bureaus manage and protect the 2.7 million acre Adirondack Forest Preserve and the 288,000-acre Catskill Forest Preserve; monitor the ecological health and function of forestland statewide; provide expertise, assistance and action where invasive species are a threat; and handle all land conveyance transactions for the Department.” Source: DEC Web site.



The BSLM has primary responsibility for the management of the resources on State Forests, including the harvesting and sale of State-owned timber. The BSLM manages approximately 797,800 acres of land. Certification pertains to 780,812 acres of State Forests in Regions 3-9.

Lands classified as State Forests include lands purchased under legislative authority that set up three broad programs: reforestation lands, multiple-use lands, and unique areas. Reforestation lands make up most of the state forest system. They are described as “properties are to be forever devoted to ‘reforestation and the establishment and maintenance thereon of forests for watershed protection, the production of timber, and for recreation and kindred purposes.’ This broad program is authorized under Article 9, Title 5 of the Environmental Conservation Law.” Source: <http://www.dec.ny.gov/lands/4982.html>

Multiple-use lands were purchased for conservation and development of natural resources, including preservation of scenic areas, watershed protection, forestry, and recreation under authority of the “Park and Recreation Land Acquisition Act of 1960” and the “Environmental Quality Bond Acts” of 1972 and 1986. Unique areas were purchased under the same authority, but are designated for management to preserve their special features, and not likely to receive timber management beyond measures to preserve important vegetation communities

The audit was performed by NSF on September 22-24, 2020 by an audit team headed by Keri Yankus, SFI Lead Auditor. The audit was conducted in conjunction with an FSC FM audit and the FSC audit team members included Evan Poirson, FSC 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 NYDEC Green Certification Coordinator is Josh Borst.

Audit Process

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 year. 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.

Several of the SFI Section 2 requirements were outside of the scope of NYDEC SFI program and were excluded from the scope of the SFI Certification Audit as follows: Performance Measures Excluded: 1.2, 2.1.5, and 8.3. No indicators were modified.

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. NSF used a formal planning process to confirm the scope of the audit, review the SFI Indicators and evidence to be used to assess conformance, verify that NYDEC was prepared to proceed to Surveillance Audit, and to prepare a detailed audit plan. NSF then conducted the Certification Audit of conformance to the SFI, 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 fourth Surveillance Audit is scheduled for week of September 27-30, 2021.

The multi-site certificate covers 7 different regions: 9, 8, 7, 6, 5, 4 & 3, including the central office located in downtown Albany, NY. The 2020 audit included office reviews in the following regions 6 (Potsdam), Region 5 (Ray brook), and the central office located in Albany, NY. Field visits were conducted in 2 out of a total of 7 regions due to Covid 19 travel restrictions. This sample size was determined using the guidelines set forth in IAF-MD1. The regions were selected based on a date rotation of total 7 regions. Approximately half of the field sites visited were randomly sampled. Within the 2 selected regions NSF’s lead auditor selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in NSF’s protocols and procedures. 2 field offices, 1 central office and 13 field sites were visited. The 13 field sites consisting of the 1 active timber harvests (hardwood thinning, hardwood even aged, Spruce Red Pine Mixed stand), 1 over story removal, 3 recently closed sale with wildlife considerations, 2 with herbicide application with invasive species, 1 natural regeneration, 1 recreation sites, 2 inactive harvest, 2 cultural resources, 1 TRP and 1 VSA. There were also several roads, several smaller road-trail/stream crossings with cross drains and BMPs being applied. The Strategic Plan and UMP for NYDEC associated inventory and growth data as well as harvest-related planning documents are used to ensure that plans (Unit Management Plans) include long term harvest level and consistent with the growth and yield model generated (Sept 2015) PAI report from SUNY ESF.

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of conformance. 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.



2020 Audit Findings

NYDEC was found to be in conformance with the standard, as NSF determined that there was one non-conformance extended. Two opportunities for improvement. This finding does not indicate a current deficiency but served to alert New York DEC to an area that could be strengthened, or which could merit future attention.

Minor nonconformance(s)

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

This process is not fully effective.

Objective evidence: TRP document is shared with multi agencies and is in the early stages of the lean process. NYDEC Lands Forests central office confirmed a draft memo was created however, it is unclear how the central office plans to deploy this memo to all field staff regarding changes to the TRP & changes made to the procedures. **EXTENDED MINOR CAR:** While a plan to address this is beginning, this has not been implemented. COVID-19 has limited work/travel that NYDEC employees have not been able to accomplish, therefore this is not upgraded, and the Minor CAR is extended.9.1

Opportunity for Improvement(s)

Indicator 4.4.2: A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions. Although the system is conforming, there may be an opportunity to improve and enhance the incorporation of research results into future forest management (UMP) decisions.

Indicator 8.1.1: Reviewed Memorandum dated 11/15/2017 RE: UMP Development and Department Consultation with Indian Nations. "Communication between the Department and Indian Nations should be direct and involve two-way dialogue and feedback. Regional staff should contact the appropriate tribal representatives in the UMP planning area while a public scoping session is scheduled. When possible and where appropriate, staff should facilitate an in-person meeting with tribal representatives to involve them in the planning unit management planning process. Where an in-person meeting is not feasible, the preferred method of engaging the Indian Nations is via a phone call. **Letters and emails are not preferred communication methods"** Statewide: Although the system is conforming, there may be an opportunity to re-check current wording expectations as stated in the Memorandum to how organization is currently communicating with Indian Nations.

Exceeds the Requirements

3.1.3: Monitoring of overall best management practices implementation. Notable: Significant improvements have been made by field foresters to document in their "sale diary" project files the status of each activity (field notes & photos). This documented evidence is kept at regional level.

2019 Audit Findings and Resolution

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

Objective evidence: TRP document is shared with multi agencies and is in the early stages of the lean process. NYDEC Lands Forests central office confirmed a draft memo was created however, it is unclear how the central office plans to deploy this memo to all field staff regarding changes to the TRP & changes made to the procedures. **EXTENDED MINOR CAR:** While a plan to address this is beginning, this has not been implemented. COVID-19 has limited work/travel that NYDEC employees have not been able to accomplish, therefore this is not upgraded, and the Minor CAR is extended.9.1

General Description of Evidence of Conformity

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

Objective 1 Forest Management Planning

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

Summary of Evidence: *The Strategic Plan and UMP for NYDEC and supporting documentation and the associated inventory and growth data as well as harvest-related planning documents were the key evidence of conformance.*



Objective 2 Forest Health and Productivity

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

Summary of Evidence: Field observations and associated records were used to confirm practices. NYDEC has programs for reforestation, for protection against common insects and diseases and wildfire, and for careful management of activities which could potentially impact soil and long-term productivity. Harvests are carefully planned, with winter logging or processor systems used on sensitive soils.

Objective 3 Protection and Maintenance of Water Resources

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

Summary of Evidence: Field observations of a range of sites were the key evidence. During inspections of completed harvests auditors reviewed measures implemented to protect water resources. Compliance with NY BMPs for the protection of these features provided additional evidence.

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, and regular staff involvement in conferences and workshops that cover scientific advances were the evidence used to assess the requirements involved biodiversity conservation.

Objective 5 Management of Visual Quality and Recreational Benefits

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

Summary of Evidence: Field observations of completed operations and policies/procedures for visual quality were assessed during the evaluation. Further involvement with the multi user recreational groups helped confirm a strong recreation program.

Objective 6 Protection of Special Sites

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

Summary of Evidence: Records of special sites and management and harvest plans were all assessed during the evaluation.

Objective 7 Efficient Use of Fiber Resources

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

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

Objective 8 Recognize and Respect Indigenous Peoples' Rights

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

Summary of Evidence: Field review and ongoing updated documents for operations.

Objective 9 Legal and Regulatory Compliance

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

Summary of Evidence: Field reviews of ongoing and completed operations were the most critical evidence.

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: Financial support was confirmed by contacting the recipients of research support or via websites listing supporting members.



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 selected personnel, records associated with harvest sites audited, and interviews were the key evidence for this objective.

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: Records provided by the audited organization and interviews were used to confirm the requirements.

Objective 13 Public Land Management Responsibilities

To participate and implement sustainable forest management on public lands.

Summary of Evidence: Unit Management Planning (UMP) process confirms the involvement with the public inputs.

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: Most of this objective relates to actions to be taken after certification; NYDEC is prepared to complete the required public reporting activities.

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 from all involved levels in the organization 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

Michelle Matteo	Daniel Freeman	Josh Borst - Forest Cert. Coordinator
NSF Forestry Program Manager	NSF Project Manager	NYDEC- Division of Lands and Forests
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Appendix 4

NSF Sustainability Audit Attendance Sheet

Company Name NYDEC

Location Region 6 Ray Brook, Region 5 Potsdam, and Central office Albany NY

Type of Audit Joint FSC/SCS FM & SFI 1015-2019 FM 3 rd surveillance audit

Opening Meeting Date 9/22/2020 Closing Meeting Date 9/24/2020

Name	Position	Attended Opening Meeting?	Attended Closing Meeting?
<i>9/22/20 Potsdam</i>			
Keri Yankus	NSF Sr. SFI Lead Auditor	X	✓
Evan Poirson	SCS FSC Lead Auditor	X	✓
Josh Borst	Forest Cert. Coordinator	✓	✓
Barb Lucas-Wilson	FORESTER 3	✓	✓
Keith Rivers	FOR 2	✓	
Henry Dedrick	FOR 2	✓	✓
Andrea Mercurio	FOR 1	✓	
Tony Sparacino	FOR 1	✓	✓
Scott Glenn	FOR TECH 3	✓	
Greg Rutley	FOR TECH 3	✓	✓
Tyler Richardson	FOR TECH 1	✓	✓
PATRICK LEE	FOREST RANGER	✓	



Sustainability Audit Attendance Sheet

Company Name NYDEC

Location Region 6 Ray Brook, Region 5 Potsdam, and Central office Albany NY

Type of Audit Joint FSC/SCS FM & SFI 1015-2019 FM 3 rd surveillance audit

Opening Meeting Date 9/22/2020 Closing Meeting Date 9/24/2020

Name	Position	Attended Opening Meeting?	Attended Closing Meeting?
9/23/20			
Keri Yankus	NSF Sr. SFI Lead Auditor	X	✓
Evan Poirson	SCS FSC Lead Auditor	X	✓
Kris Alberga	Nat. Resources Supervisor	✓	✓
Rob Daley	Regional Forester (FOR)	✓	✓
Dan Levy	FOR 1	✓	✓
Josh Borst	FOR 2	✓	✓
Barb Lucas-Wilson	FOR 3	✓	✓



Sustainability Audit Attendance Sheet

Company Name NYDEC

Location Region 6 Ray Brook, Region 5 Potsdam, and Central office Albany NY

Type of Audit Joint FSC/SCS FM & SFI 1015-2019 FM 3 rd surveillance audit

Opening Meeting Date 9/22/2020

Closing Meeting Date 9/24/2020

Name	Position	Attended Opening Meeting?	Attended Closing Meeting?
<u>9/24/20</u> Keri Yankus	NSF Sr. SFI Lead Auditor	X	✓
Evan Poirson	SCS FSC Lead Auditor	X	✓
<u>Just Borst</u>	<u>FOR 2</u>	✓	✓
<u>Barb Lucas-Wilson</u>	<u>FOR 3</u>	✓	✓
<u>Rob Messenger</u>	<u>FOR 4</u>	✓	✓
<u>Jan Crisman</u>	<u>Natural Resources Planner</u>	✓	✓
<u>Keith Rivers</u>	<u>FOR 2</u>	✓	✓
<u>Rolo Daley</u>	<u>FOR 3</u>	✓	✓
<u>Kris Albergen</u>	<u>Nat. Resources Supervisor</u>	✓	✓
<u>Dan Levy</u>	<u>FOR 1</u>	✓	✓
<u>Henry Dedrick</u>	<u>FOR 2</u>	✓	✓
<u>Rob Davies</u>	<u>Division Director</u>	✓	✓
<u>Peter Innes</u>	<u>Asst. Division Director</u>	✓	✓
<u>Tony</u>	<u>FOR 1</u>	✓	✓
<u>Tyler</u>	<u>FOR Tech 1</u>	✓	✓
<u>Greg</u>	<u>FOR TECH 3</u>	✓	✓

* FOR 2 = Supervising Forester

FOR 3 = Regional FORESTER



Appendix 5

Forestry Program COVID-19 Report Appendix

Client Name: NYDEC

FRS: 6L741

Is this a fully remote special audit?

YES NO
[] [x]

Justification:

Field visits were conducted from 22-23 September, in-person meetings are avoided at this time due to Covid-19. Remote opening and closing meetings were held on 22 & 24 September, respectively.

Is a remote special audit for certificate extension needed?

YES NO
[] [x]

Justification:

N/A

Approximate date of the future on-site special surveillance or re-evaluation audit to be completed within the allowed extension period.

N/A

Was this remote audit able to be effectively completed using remote audit methods?

YES NO
[x] []

If no, why?

State reason if "no" is selected:

Are there specific portions of the audit that could not be effectively evaluated?

YES NO
[] [x]

Portion of the audit that could not be audited:

N/A

Are there are follow-up items needed from the remote event?

YES NO
[] [x]

Does additional time need be added to the next audit based on these follow-up items?

State follow-up items needed if "yes" is selected:

Remote audit methods used:

Remote method/tool

Used for

On-line conference call and video

Cisco WebEx

Interview with NYDEC staff and partners
Opening and closing meetings



Additional questions

When is it expected that the organization will be able to function normally?

Unknown. State employees are not back to full working schedules.

Is the organization able to ship products or perform the service defined within the current scope of certification? If not, when is it expected to be able to do so?

Yes

Does the organization need to use alternative manufacturing and/or distribution sites? If so, are these currently covered under the current certification or will they need to be evaluated?

No.

Will some of the processes and/or services performed, or products shipped be subcontracted to other organizations? If so, how will the other organizations' activities be controlled by the certified organization?

No.

To what extent has operation of the management system been affected?

Management systems are not currently affected.

Has the certified organization conducted an impact assessment regarding COVID-19?

Yes, at the State of NY level & NYDEC State Agency.
