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

State of New York, Bureau of State Land Management

SCS-FM/COC-00104N

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Client Website	www.dec.ny.gov/lands/309.html

CERTIFIED	EXPIRATION
28 January 2018	27 January 2023

DATE OF FIELD EVALUATION
28-30 September 2021
DATE OF REPORT FINALIZATION
13 December 2021

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Foreword

Cycle in annual surveillance evaluations				
☐ 1st annual evaluation	☐ 2nd annual evaluation	☐ 3rd annual evaluation	☒ 4th annual evaluation	☐ Other (*expansion of scope, Major CAR audit, special audit, etc.*):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
New York State (NYS), Department of Environmental Conservation (DEC or NYSDEC), Bureau of Forest Resource Management (BFRM).				

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual evaluations to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database http://info.fsc.org/.

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

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual evaluation);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this evaluation; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the evaluation.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (http://info.fsc.org/) no less than 90 days after completion of the on-site evaluation. Section B contains more detailed results and information for required FSC record-keeping or the use by the FME.

Table of Contents

SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

Auditor name:	Evan Poirson	**Auditor role:**	Audit Team Leader
Qualifications:	Evan is the Senior Program Associate for the Forest Management program at SCS, and has worked in the program since 2015. He has been a Lead FSC Forest Management auditor since 2018, and a Lead FSC COC auditor since 2020. He has conducted Forest Management, COC, and Salvaged Wood audits in Argentina, Costa Rica, Dominican Republic, Ghana, Honduras, Mexico, Panama, Paraguay, Spain, South Korea, and in several regions of the United States. In addition to auditing, his duties include managing the administrative and quality-related aspects of forest management operations at SCS headquarters in California. He holds degrees in Biology (conservation emphasis) from Occidental College (B.A., 2009) and Environmental Management from Duke University (M.E.M., 2014). In 2010-12, he served as an environmental volunteer of the United States Peace Corps in the Dominican Republic.		
Auditor name:	Michelle Matteo	**Auditor role:**	Team Auditor
Qualifications:	Michelle L. Matteo is a senior lead auditor for NSF based in Southern New England. Michelle is a forester and arborist and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Arborist Certification. In addition to her role as an experienced lead auditor, Michelle serves as the manager of NSF's Forestry Program. Michelle has completed a 3-day ISO 19011 training designed & presented in relation to the FSC Standards. For over 13 years, she has completed thousands of SFI, PEFC, & FSC Chain of Custody and Certified Sourcing audits, certification audits of the Northeast Master Logger program, and is a senior lead auditor for SFI & FSC Forest Management, American Tree Farm System (ATFS), SFI Fiber Sourcing, and FSC Controlled Wood. Her auditing experience spans the continental US, Canada, and the UK. She earned an MS in Forestry and BS in Wildlife & Fisheries Biology, both from the University of Massachusetts.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation	2.5
B. Number of auditors participating in on-site evaluation	2
C. Number of days spent by any technical experts (in addition to amount in line A)	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up	2
E. Total number of person days used in evaluation	**7.0**

1.3 Applicable Standards

All applicable FSC standards are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS's Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft

Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS's COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements. "Applicable standards" are all FSC standards with which the certified entity must comply, not just the standards selected for evaluation this year.

Standards applicable *NOTE: Please include the full standard name and Version number and check all that apply based on type of certificate.*	☒ Forest Stewardship Standard(s), including version: FSC-US Forest Management, 2010
	☒ FSC Trademark Standard (FSC-STD-50-001 V2-0)
	☒ SCS COC indicators for FMEs, V8-0
	☐ FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	☒ Other: FSC Pesticides Policy (FSC-POL-30-001; 2019)

1.4 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	**To**	**multiply by**
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft.)	Meter (m)	0.3048
Yard (yd.)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	**To**	**multiply by**
Square foot (sq. ft.)	Square meter (m^2)	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	**To**	**multiply by**
Cubic foot (cu ft.)	Cubic meter (m^3)	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

Tuesday, 28 September 2021: **Region 9 (Dunkirk area)**	
FMU/ location/ sites visited	**Activities/ notes**
Dunkirk Regional Office 8 AM	Opening Meeting/Agenda Review • Introductions, Confirmation of Roles, Audit Objectives, and resources/facilities required by the audit team

	• Review Audit Procedures and Plan, including; timetable, audit objectives, including standards used and selected requirements to be assessed, methods and procedures, including sampling process, determine Interviewees, confirmation of matters relating to confidentiality • Formal communication channels between the audit team and auditee • Confirmation of relevant work safety, emergency and security procedures for the audit team • Discussion of corrective action requests / plans, including method of reporting audit findings / grading of CARs • Review of findings (CARs-OFIs) raised during previous audits • Conducting staff interviews in the absence of (line) management • Records of any complaints received by Company and Complaints/Appeals system on the conduct or conclusions of an Audit • Program overview by NYSDEC staff • Discuss field site visit provisions and other logistical issues • Final site selection and audit route review • Client questions
Chautauqua Gorge State Forest 9:00 – 11:00am	• Review of Sale X011967 (active sale during winter 2020-21) • Topics discussed: o Management adaptations due to nearby bat hibernacula o Road management and gravelling o Pesticide use and related PPE requirements o Invasive species (stiltgrass, knotweed, multiflora rose) vis-à-vis road management o Oil and gas exploration o Streamside/riparian management and buffer zones o Snag retention o Ash salvage harvesting o RTE species protection (Pieris virginiensis and family Cordulegastridae) o Monitoring (including pesticides management) o Recreational (camping use), including ADA trail matinenance
North Harmony State Forest 11:00am – 12:00pm	• Review of Sale X009768 • Topics discussed: o Pesticide application o Fluid leak management o Indigenous consultation o Stream crossings and culverts o Natural regeneration of former plantation areas

	○ Monitoring
Whalen Memorial State Forest 12:30 – 1:00pm	• Topics discussed: ○ Culverts and road management
Brokenstraw State Forest 1:00 – 3:00pm	• Review of Sale X012171 • Topics discussed: ○ Sales inspections ○ PPE requirements ○ Hemlock Woolly Adelgid management and hemlock management ○ Road close-out procedures and water bars ○ Landing areas ○ Larch plantation
4:30 - 9:30 PM	Daily Debrief & Transit to Hotel
Overnight at Fairfield Inn - Cortland	
Wednesday, 29 September 2021: **Region 7 (Cortland area)**	
Cortland Regional Office 8 AM	"Mini" opening Meeting/Agenda Review • Review of GIS on sale X010643
Fairfield State Forest 9:00am – 12:00pm	• Review of active site • Topics discussed: ○ PPE requirements, spill kits, and first-aid ○ Marking, flagging and boundaries ○ Equipment use ○ Culverts
Shindagin Hollow State Forest 12:00 – 2pm	• Topics discussed: ○ Road close-out procedures ○ Herbicide applications and contracts ○ Invasive treatments ○ UMP development and applicability
Hammond Hill State Forest 2:30 – 4:00pm	• Topics discussed: ○ Recreation and trail maintenance ○ TRPs • UMP development and applicability
4:30-5:00 PM	Daily Debrief & Transit to Hotel
Overnight at Hampton Inn & Suites Syracuse North Airport Area	
Thursday, 30 September 2021: **Albany (Central Office) – *done remotely***	
8:30am – Noon	Final staff interviews as follows: 8:30-9:00 am: Ecologist, NY Natural Heritage Program - This program is responsible for surveying, documenting and monitoring Rare Communities and Special Treatment Areas (HCVFs) 9:30-10:00 am: Environmental Program Specialist (GIS database manager, State Forest Inventory Database (SFID) manager) 10:30-11:00 am: Director, NYSDEC Division of Lands and Forests 11:30 am – 12:30 pm: Chief, Bureau of Forest Resources Management (BFRM), NYSDEC Division of Lands and Forests;

	Indian Affairs Coordinator, Office of Environmental Justice, NYSDEC Division of Lands and Forests
12:30pm	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm evaluation findings
2:00pm	Closing Meeting: Review preliminary findings (potential non-conformities and observations) and discuss next steps

2.2 Evaluation of Management Systems

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

3. Changes in Management Practices

☒ There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies.

☐ Significant changes occurred since the last evaluation that may affect the FME's conformance to FSC standards and policies (*describe*):

4. Results of Evaluation

4.1 Definitions of Major CARs, Minor CARs and Observations

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

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

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

4.2 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation 2017	1st Annual Evaluation 2018	2nd Annual Evaluation 2019	3rd Annual Evaluation 2020	4th Annual Evaluation 2021
No findings	☐	☐	☐	☐	☐
P1		Minor 1.5.a	Minor 1.1.b	Minor 1.1.b (Covid-19 extension)	
P2					
P3					
P4					
P5		Minor 5.1.a Obs 5.1.b Obs 5.6.c	Obs 5.6.c		
P6	Minor 6.5.b OBS 6.5.d				OBS 6.3.h
P7	OBS 7.1.b		Obs 7.2.a	Obs 7.2.a	
P8					
P9					
P10					
COC for FM					
Trademark					
Group	N/A				
Other					

4.3 Existing Corrective Action Requests and Observations

	Finding Number: Minor 2020.1
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
Deadline	☐ Pre-condition to certification/recertification ☐ 3 months from Issuance of Final Report ☒ 12 months or next regularly scheduled audit (surveillance or re-evaluation) ☐ Observation – response is optional ☐ Other deadline (specify):
FSC Indicator:	1.1.b To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.

Non-Conformity *(or Background/ Justification in the case of Observations)*:
2019: NY State is currently conducting a detailed and comprehensive analysis of the workflows associated with the TRP process. A multi-divisional team was assembled and the comprehensive review started in May 2019. The team assembled includes the support staff person who processes the TRPs and enters into databases; supervisors from Regions 3, 4, 5, 6; FW Supervisors from Region 5/8; Operations staff Region 5; Central Office operations staff (campgrounds); and facilitators for the Lean process being used as the framework for the review project work. The first "kick-off" meeting was June 13, 2019; The "pre-mapping" to identify high level process barriers was June 21, 2019; the team created a process map and identified opportunities for improvement, July 17, 2019; statistical summaries (baseline data) were started and are still underway, early results indicates thousands of TRPs are being done across divisions; workflow analyses are being done now by facilitators. Milestones for the revision process have been started by the team.
Milestones are being identified based on the following High Level Process Steps:
1. (Public) Make inquiry about activity on state land; fill out TRP application; 2. (RO) Receive application; 3. (RO & CO) Review application for completeness and appropriate fee request additional information as needed; 4. (RO) Draft permit and log in to State Forest Inventory Database (L& database); 5. (Regional Land/WL/Fisheries Mgr, NRS) Sign off on draft permit; 6. (RO) Send draft permit package to CO for processing; 7. (CO) Review draft permit package; 8. (CO) Sign off on final permit and return to RO; (RO) Issue permit (TRP).
While this process continues the DEC is using interim instructions and language under the "Special Instruction" section of the TRPs, as was confirmed in sampled TRPs during the audit (see Site Notes). The new Internal Audit being done by the DEC included TRPs in their discussions, and supervisors confirmed during interviews some awareness of the interim instructions. However, these was some confusion about how the new revisions would be communicated effectively to all staff involved with TRPs.

Corrective Action Request *(or Observation)*:
To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations, including application of Interim and any future revised TRP policies that apply to DEC lands under scope of the "green certification".

FME response *(including any evidence submitted)*	**2020:** The multi-divisional review process started in June 2019 has been stalled, at this point, due to the COVID pandemic. The review team has met and has developed a number of recommendations that need to be presented to Executive staff for approval, but no definitive time frame has been set yet. A final guidance document was sent to staff in August 2020 specifying under what circumstances 48-hour notification is required prior to a permitted activity taking place. See the attached guidance.
SCS review	**2020**: According to a memorandum issued by Division Director on 20 August 2020, the TRP Process is currently undergoing a "mini" lean evaluation to determine where improvements can be made to the TRP process to improve overall efficiency. Until the lean assessment is complete, the memo will serve as interim guidance and identifies a list of six activities that require 48-hour notification prior to commencement: ○ Vegetation management ○ Herbicide application ○ Firearms usage ○ Animal eradication

	○ Heavy equipment operation ○ Activities which may be of concern to the public (at the professional discretion of regional staff) The 2020 audit team was satisfied to see that progress toward closing this Corrective Action Request has been undertaken. However, due to the 2020 COVID pandemic and the ensuing suspension of the TRP review process, this finding due date was extended as **Minor CAR 2020.1** and will be reevaluated during the 2021 annual surveillance audit. **2021**: Since the 2020 audit, NYSDEC reviewed its TRP issuance process and decided to remove boilerplate language requiring at least 48 hours' notice for any activity requiring a TRP. Notification periods will still be required for certain activities requiring a TRP, but for many other activities, no formal notification will be required prior to commencement of the permitted activity. This change reduces the risk that a permit holder be out of conformance with the language of the permit, and that NYSDEC fail to ensure that all deadlines required by the permit be met. A recently issued TRP was reviewed during the audit, and it was confirmed that the clause requiring advance notification was removed. The audit team judged that this finding may be closed.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: OBS 2020.2
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification/recertification ☐ 3 months from Issuance of Final Report ☐ 12 months or next regularly scheduled audit (surveillance or re-evaluation) ☒ Observation – response is optional ☐ Other deadline (specify):
FSC Indicator:	7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.
Non-Conformity *(or Background/ Justification in the case of Observations)*: The DEC has 7 State Forest Regions which work collaboratively with multiple Divisions. Overall, the DEC is in conformance with this indicator. However, interviews during the 2019 audit identified some inconsistencies about how frequently such scientific/technical reviews are done and incorporated into forestry work for implementing forest management plan (SF UMPs).	
Corrective Action Request *(or Observation)*: When incorporating new scientific and technical information into technical implementation of new	

scientific and technical information, the DEC could improve consistency across all SF Regions.	
FME response *(including any evidence submitted)*	The NYS Natural Heritage Program (NYNHP) currently monitors all of our Special Treatment Areas and Rare Communities located on our certified acreage. In 2017 the Division of Lands and Forests (DLF) entered into an agreement with the NYNHP to monitor all 287 STAs and 50 RCs over a 5-year period as outlined in the attached proposal. Monitoring data and associated information for these areas are entered into NYNHP databases and then summarized and made available via NYNHP data layers using the DEC GIS Data Selector tool. Additionally, quarterly reports are provided to DLF detailing the NYNHP's actions and findings and are distributed to all regional staff as well as posted on the DLF intranet site. These sites are monitored on a schedule in advance of Unit Management Plans (UMPs) being written to make the most recent data available to staff to incorporate into each UMP. Regional staff are aware of these results and are encouraged to reach out to NYNHP staff directly with any specific inquires related to their particular geographic areas of responsibility. The NYNHP staff also routinely reach out to regional staff when conducting this monitoring to offer an opportunity to ask questions and/or accompany them on site visits. DLF staff review the monitoring results and any management recommendations provided to ensure they are consistent with State Land management policies and compatible with our Forest Certification program prior to finalizing any recommendations.
SCS review	**2020:** As confirmed via interviews with Chief of BFRM and other FME staff on 24 September 2020, the NYSDEC is soon to publish a new version of its Forest Action Plan by 2021. The draft version of the Plan is available for public review at https://www.dec.ny.gov/docs/lands_forests_pdf/nysfap.pdf, and had originally been previewed for publication during 2020. However, due to the 2020 COVID pandemic and the ensuing prolongation of the Plan updates, this finding is maintained as **Observation 2020.2** and will be reevaluated during the 2021 annual surveillance audit. **2021:** The Strategic Plan for SF Management (2021 draft) was shared with the audit team during this year's surveillance audit. It is awaiting final peer review and is on track to be finalized by early 2022, if not by the end of the 2021. Given the highly advanced state of progress of the Plan, the auditor analyzed conformance based on strategic plan and concluded closure is warranted.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

4.4 New Corrective Action Requests and Observations

	Finding Number: 2021.1
Finding and Deadline	

☐ **Major CAR**: Pre-condition to certification/recertification ☐ **Major CAR**: 3 months from Issuance of Final Report ☐ **Minor CAR**: 12 months or next regularly scheduled audit, whichever comes first (*surveillance or re-evaluation*) ☒ **Observation** – response is optional ☐ **Other** and deadline (specify):	
FMU CAR/OBS issued to (when more than one FMU): N/A	
Standard and Indicator	FSC Forest Management Standard, 6.3.h
☐ **Non-Conformity Evidence** ☒ **Observation Justification and/or Explanation** Invasive species were discussed at length during each site visit during the 2021 surveillance audit. NYSDEC contends with a number of invasive species, including knotweed, stiltgrass, swallow-wort, honeysuckle, and many others. Given the intractable nature of invasives within the state, and the extent to which they are already established, the efficacy of NYSDEC's actions in limiting these species' spread is limited. NYSDEC personnel routinely monitor invasives' spread during pre- and post-harvest operations and thereby demonstrate conformance with the requirements of this indicator. However, the audit team concludes that there are opportunities to enhance BFRM's invasive management strategies, including but not limited to implementing a consistent monitoring protocol across all regions of the state and communicating the importance of these efforts to contracted forest workers.	
☐ **Non-Conformity Corrective Action Request** ☒ **Observation; no Corrective Action is required** The audit team concludes that there are opportunities to enhance BFRM's invasive management strategies, including but not limited to implementing a consistent monitoring protocol across all regions of the state and communicating the importance of these efforts to contracted forest workers.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

5. Stakeholder Comments

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

- To solicit input from affected parties as to the strengths and weaknesses of the FME's management, relative to the standard, and the nature of the interaction between the FME and the surrounding communities.

- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used.

5.1 Stakeholder Groups Consulted

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the comments falling within scope of the standard received from stakeholders and the assessment team's response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

☒ *FME has not received any stakeholder comments from interested parties (who are not members of the enterprise under evaluation) as a result of stakeholder outreach activities during this annual evaluation.*
Summary of Outreach Activities Conducted (Check all that apply): ☒ Face to face meetings ☐ Phone calls ☒ Email, or letter ☐ Notice published in the national and/or local press ☐ Notice published on relevant websites ☐ Local radio announcements ☐ Local customary notice boards ☐ Social media broadcast

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME's response to any open CARs.	**Yes** ☒ **No** ☐

Comments: N/A

7. Annual Data Update

☐ No changes since previous evaluation.	
☒ Information in the following sections has changed since previous evaluation.	
☐ Name and Contact Information ☐ FSC Sales Information ☒ Scope of Certificate ☐ Non-SLIMF FMUs ☐ Social Information	☐ Pesticide and Other Chemical Use ☒ Production Forests ☐ FSC Product Classification ☐ Conservation & High Conservation Value Areas ☐ Areas Outside of the Scope of Certification

Name and Contact Information

Organization name	State of New York, DEC, Bureau of Forest Resource Management		
Contact person	Josh Borst, Forester 2, Bureau of Forest Resource Management, Division of Lands and Forests		
Address	625 Broadway, 5th Floor Albany, NY 12233-4255	**Telephone**	518-473-9209
		Fax	518-402-9028
		e-mail	joshua.borst@dec.ny.gov
		Website	www.dec.ny.gov

FSC Sales Information

☒ *FSC Sales contact information same as above.*

Scope of Certificate

Certificate Type	☒ Single FMU	☐ Multiple FMU
	☐ Group	
SLIMF (*if applicable)*	☐ Small SLIMF certificate	☐ Low intensity SLIMF certificate
	☐ Group SLIMF certificate	
# Group Members (*if applicable)*	N/A	
Number of FMUs in scope of certificate		
Geographic location of non-SLIMF FMU(s)	*Latitude & Longitude: 42.6529/-73.7491*	
Forest zone	☐ Boreal	☒ Temperate
	☐ Subtropical	☐ Tropical
Area in scope of certificate which is:	**Units: ☐ ha or ☒ ac**	
privately managed		
state managed	788,222	
community managed		

Total forest area in scope of certificate *(Is also equal to [productive area] + [conservation area)*	788,222
Prior year total forest area in scope of certificate *(from prior year report)*	782,854
Has Total forest area changed from prior year?	☐ No Change from prior year ☒ Yes, there was a change from prior year. Explain change: Some acquisitions this year, plus adjustments to acreage as survey data is received, new surveys are conducted, and boundary lines are adjusted. This results in small changes every year when acreage is recalculated ahead of audits. Regarding the ca. 20,000-acre increase in productive forest area: the 2020 figure did not include the Management Classes "Experimental", "Inspections" or "Recreation" (approx. 14,000 ac). NYSDEC has determined that it is appropriate to include these stands as production forest as these lands are open to timber harvesting, though harvesting may not be the primary management purpose. This re-calculation of those stands that should be included as production forests, along with acquisitions and adjustments made by our Real Property department, account for the differences.

Number of FMUs in scope that are:			
less than 100 ha in area		100 - 1000 ha in area	
1000 - 10 000 ha in area		more than 10 000 ha in area	1

Total forest area in scope of certificate which is included in FMUs that:	**Units: ☐ ha or ☐ ac**
are less than 100 ha in area	0
are between 100 ha and 1000 ha in area	0
meet the eligibility criteria as *low intensity* SLIMF FMUs	0

Division of FMUs into manageable units:

This FME maintains 9 regional offices located throughout the state of which 7 regional areas are certified. Within each region, the Division of Operations supports the Bureau of Forest Resource Management, BFRM, by providing technical services, facilities management, and maintenance of physical assets. The Bureau of Fish and Wildlife assists with developing management decisions to protect species and habitat. The Divisions of Law Enforcement and Forest Protection provide support through law enforcement, education and public outreach. Personnel from each Division are assigned to regional offices and collaborate to manage the Reforestation Areas, Multiple Use Areas, Unique Areas, and State Nature and Historic Preserves within the scope of this assessment.

Land within each region is grouped into planning units. A Unit Management Plan is written for each unit and includes objectives and activities that are designed to accomplish specific management goals. This FME maintains 74 planning units.

Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
male workers: 58	female workers: 14	
Number of accidents in forest work since previous evaluation:	Serious: 0	Fatal: 0

Pesticide and Other Chemical Use

☐ *FME does not use pesticides.*

Commercial name of pesticide / herbicide	**Active ingredient**	**Quantity applied since previous evaluation (gallons)**	**Total area treated since previous evaluation (ac)**	**Reason for use**
Ranger Pro	Glyphosate	1.25	42.6	Control interfering/invasive vegetation
Accord II	Glyphosate	2	10.7	Control interfering/invasive vegetation
Accord XRT II	Glyphosate	32.43	278.15	Control interfering/invasive vegetation
Oust	Sulfometuron methyl	8.149 lbs	29	Control interfering/invasive vegetation
Oust	Sulfometuron methyl	0.04	42	Control interfering/invasive vegetation
Roundup Promax	Glyphosate	0.823	2.2	Control interfering/invasive vegetation
Rodeo	Glyphosate	263.85	1396.9	Control interfering/invasive vegetation
Round-Up Power Max	Glyphosate	0.65	53	Control interfering/invasive vegetation
Vastlan 2%, Milestone 0.25% (32 oz/100 gal), Escort 4 oz./100 equivalent	triclopyr choride, trilisopropanolammonium, metsulfuron-methyl	1491	27	Control interfering/invasive vegetation
Vastlan 2.5%,	triclopyr choride	34.6	18	Control interfering/invasive vegetation
Rodeo w/ SFM Extra	Glyphosate, Sulfometuron-methyl	0.57	44	Control interfering/invasive vegetation
OUST XP	Sulfometuron-methyl	1.42	108	Control interfering/invasive vegetation
OUST XP	Sulfometuron-methyl	14.32 lbs	153	Control interfering/invasive vegetation
ACCORD XRT	Glyphosate	7.8	122	Control interfering/invasive vegetation
ALLIGARE SFMX	Sulfometuron-methyl	0.8	121	Control interfering/invasive vegetation

SFM Extra	Sulfometuron-methyl	0.48	32	Control interfering/invasive vegetation
Tank mix of 8% Rodeo and 1% Polaris carried in Thinvert RTU	glyphosate / isopropylamine salt of imazapyr	16.75	1.344	Control interfering/invasive vegetation
Mad Dog & Garlon 4 Ultra mixed in water	glyphosate & triclopyr	2	0.068	Control interfering/invasive vegetation
Crossbow	2-4-d & triclopyr	7.56	2.2	Control interfering/invasive vegetation
Mad Dog	glyphosate	12.46	29.6	Control interfering/invasive vegetation
Garlon 4 Ultra	triclopyr	0.38	26	Control interfering/invasive vegetation
Safari & Quali-Pro	Dinotefuran & Imidacloprid 2F	98	25	Control interfering/invasive vegetation
Garlon 3a/basal oil	Triclopyr	2.5	16	Control interfering/invasive vegetation
Pathfinder II	triclopyr	5.29	122	Control interfering/invasive vegetation
Garlon 3A	triclopyr	17.38	94	Control interfering/invasive vegetation

Production Forests

Timber Forest Products	**Units: ☐ ha or ☒ ac**
Total area of production forest (i.e. forest from which timber may be harvested)	696,444
Area of production forest classified as 'plantation'	-
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	20,000
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	676,444
Silvicultural system(s)	**Area under type of management**
Even-aged management	
Clearcut (clearcut size range 12-35)	189
Shelterwood	131
Other:	3107
Uneven-aged management	
Individual tree selection	1901
Group selection	
Other:	
☐ Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
Non-timber Forest Products (NTFPs)	

Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	-
Other areas managed for NTFPs or services	-
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	-
Species in scope of joint FM/COC certificate: *Scientific/ Latin Name* (Common/ Trade Name)	
Acer rubrum, Red Maple; Acer saccharum, Sugar Maple; Prunus serotina, Black Cherry; Quercus rubra, Red Oak; Quercus alba, White Oak; Fraxinus americana, White Ash; Tsuga canadensis, Eastern Hemlock; Abies balsamea, Balsam Fir; Larix laricina, Eastern Larch; Picea abies Norway Spruce; Pinus strobus, White Pine; Pinus resinosa, Red Pine; Picea rubens, Red Spruce	

FSC Product Classification*

Timber products		
Product Level 1	**Product Level 2**	**Species**
Logs W1	W1.1	Refers to species list above
Fuelwood W1	W1.2	Refers to species list above
Non-Timber Forest Products		
Product Level 1	**Product Level 2**	**Product Level 3 and Species**
Food N9	N9.6	N9.6.1 Sugar Maple (Acer saccharum)

**Note: W1, W2, and W3 product groups usually do not require a separate evaluation to FSC-STD-40-004 (COC) if processing occurs in the field for FM/COC and CW/FM certificate types. N1-N10 (NTFPs) are eligible to be sold with FSC claims under FM/COC certification if reported here. Bamboo and NTFPs derived from trees (e.g. cork, resin, bark) may be eligible for FM/COC and CW/FM certification. NTFPs used for food and medicinal purposes are not eligible for CW/FM certification. Check with SCS if you have any products intended to be sold with an FSC claim outside of any of these categories.*

Conservation and High Conservation Value Areas

Conservation Area	**Units: ☐ ha or ☒ ac**
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	91,778

**Note: Total conservation and HCV areas may differ since these may serve different functions in the FME's management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.*

High Conservation Value Forest / Areas			**Units: ☐ ha or ☒ ac**
Code	**HCV Type**	**Description & Location**	**Area**
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Special Treatment: New York Natural Heritage Element Occurrences (non-community type only) with survey dates between 1990-2013 with a state "rarity" rank of S1, S2, and S1S2. Clipped to State Forests	18,625

HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		0
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Rare Community: New York Natural Heritage Element Occurrences (community type only) with survey dates between 1990-2013 with a state “rarity” rank of S1, S2, and S1S2. Clipped to State Forests	11,329
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Watershed: Portions of State Forests that overlay Sole and Primary Source Aquifers, have public water supply intakes downstream within the Hydrologic Unit Code (HUC) 12 watershed or are within the Department of Health Source Water Assessment Program Plan (DOH SWAPP) delineated buffers (zone of influence) around public ground water wells that are surface water influenced.	124,336
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	Cultural Heritage: Currently over 825 point locations that are delineated on the ground by forestry/field staff representing any number of culturally significant/historic sites in our state land assets data set.	N/A
HCV6	Forests or areas critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	Cultural Heritage: Currently over 825 point locations that are delineated on the ground by forestry/field staff representing any number of culturally significant/historic sites in our state land assets data set.	N/A

Total area of forest classified as 'High Conservation Value Forest / Area'	154,290

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

☐ N/A – All forestland owned or managed by the applicant is included in the scope.	
☒ Applicant owns and/or manages other FMUs not under evaluation.	
☐ Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.	
Explanation for exclusion of FMUs and/or excision:	New York State owns and manages 2,800,000 acres of Forever Wild Forests within the Adirondack Forest Preserve and 300,000 acres within the Catskill Forest Preserve. These acreages are part of a preserve system where harvesting is not allowed and excluded from this certificate. Additional acreages located on Long Island are not harvested and are not included within this certificate. Lower Salmon River SF is managed by the Division of Fish and Wildlife. Timber harvesting will not take place here. Stewart SF has 384.5 ac under a long-term agricultural leases. Timber harvesting does not take place on these acres. There are 1,236 ac of transmission lines occurring on certified lands statewide. These acres are evident on the ground as well as delineated in a GIS layer. Timber harvesting does not take place on these acres.
Control measures to prevent mixing of certified and non-certified product (C8.3):	Harvesting does not take place in the excluded acreage.

Description of FMUs excluded from or forested area excised from the scope of certification:

Name of FMU or Stand	Location (city, state, country)	Size (☐ ha or ☒ ac)
Adirondack Forest Preserve	NY, USA	2,800,000
Catskill Forest Preserve	NY, USA	300,000
NY DEC Region 1	Suffolk County, NY, USA	16,218
NY DEC Region 2	Bronx, Richmond and Queens Counties (Long Island), NY, USA	770
NY DEC Region 7	Lower Salmon River State Forest	1726
NY DEC Region 3	Stewart State Forest	384.5
Transmission line ROWs	Statewide	1,236

SECTION B – APPENDICES (CONFIDENTIAL)

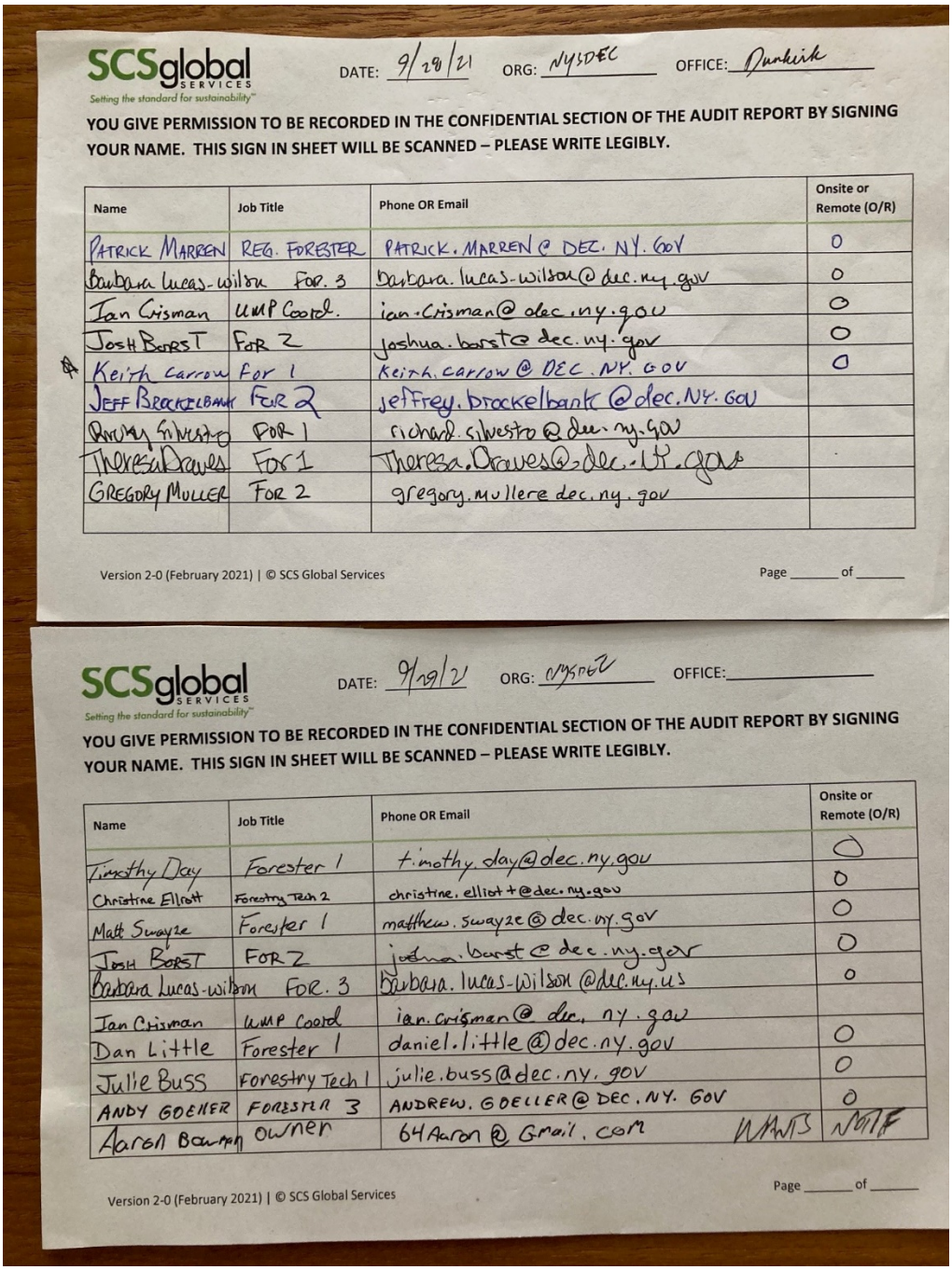
Appendix 1 – List of FMUs Selected for Evaluation

☒ FME consists of a single FMU

☐ FME consists of multiple FMUs or is a Group

List of FME Staff Consulted

To protect privacy, only FME staff who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**



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Name	Job Title	Phone OR Email	Onsite or Remote (O/R)
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Barbara Lucas-Wilson	FOR. 3	Barbara.lucas-wilson@dec.ny.gov	O
Ian Crisman	UMP Coord.	ian.crisman@dec.ny.gov	O
Josh Borst	For 2	joshua.borst@dec.ny.gov	O
Keith Carrow	For 1	Keith.carrow@DEC.NY.GOV	O
Jeff Brockelbank	For 2	jeffrey.brockelbank@dec.NY.GOV	
Richard Silvestro	FOR 1	richard.silvestro@dec.ny.gov	
Theresa Draves	For 1	Theresa.Draves@dec.NY.gov	
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Name	Job Title	Phone OR Email	Onsite or Remote (O/R)
Timothy Day	Forester 1	timothy.day@dec.ny.gov	O
Christine Elliott	Forestry Tech 2	christine.elliot+@dec.ny.gov	O
Matt Swayze	Forester 1	matthew.swayze@dec.ny.gov	O
Josh Borst	FOR 2	joshua.borst@dec.ny.gov	O
Barbara Lucas-Wilson	FOR. 3	Barbara.lucas-Wilson@dec.ny.us	O
Ian Crisman	UMP Coord	ian.crisman@dec.ny.gov	
Dan Little	Forester 1	daniel.little@dec.ny.gov	O
Julie Buss	Forestry Tech 1	julie.buss@dec.ny.gov	O
ANDY GOELLER	FORESTER 3	ANDREW.GOELLER@DEC.NY.GOV	O
Aaron Bauman	Owner	64Aaron@Gmail.com WANTS	NOTE

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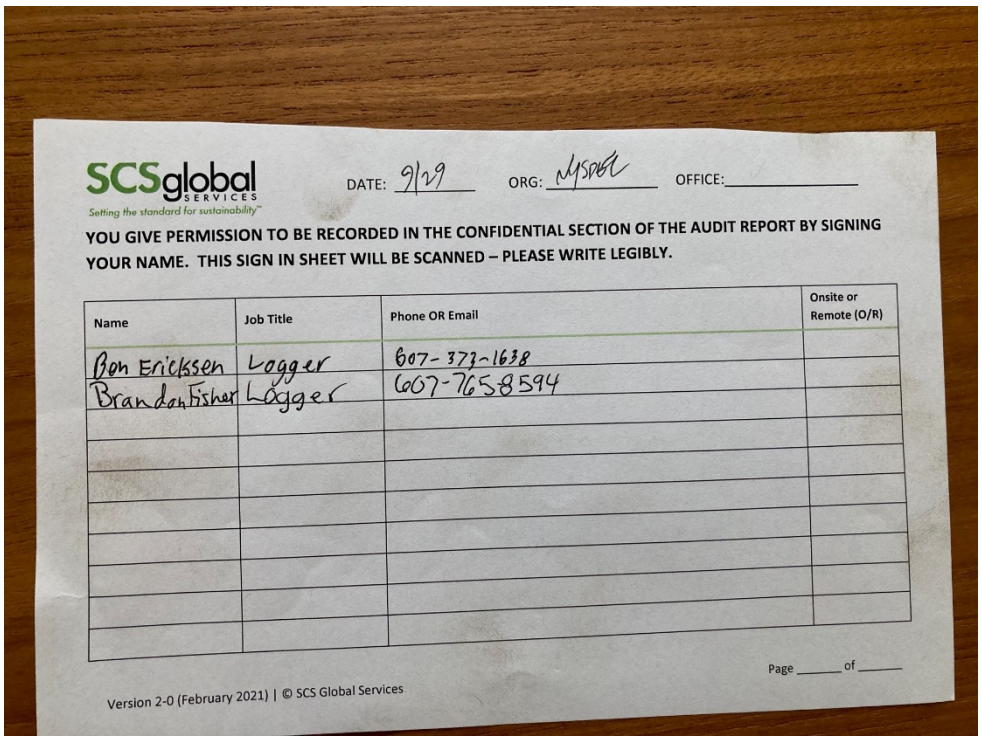
To protect privacy, only stakeholders who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**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Name	Job Title	Phone OR Email	Onsite or Remote (O/R)
Ben Ericksen	Logger	607-373-1638	
Brandon Fisher	Logger	607-7658594	

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Page ____ of ____

Name	Title	Contact Information	Consultation method	Requests Stakeholder Notification? (Y/N)
Aaron Bowman	Owner, Bowman Lumber	64aaron@gmail.com	Face-to-face	Y
Ben Ericksen	Logger	(see above)	Face-to-face	N
Brandon Fisher	Logger	(see above)	Face-to-face	N

** Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities, such communications are retained by SCS subject to FSC and ASI examination.*

Appendix 3 – Additional Evaluation Techniques Employed

☒ None.

☐ Additional techniques employed (*describe*):

Appendix 4 – Required Tracking

Pesticide Derogations

☒ There are no active pesticide derogations for this FME.

Progressive HCVF Assessments

☒ FME does not use partial or progressive HCVF assessments.*

**Note: In the case the FME is not operating in the entire management unit, it is permissible to only complete an HCVF assessment for the portion of the unit in which they are operating under special conditions. In such cases, the HCVF assessment must be extended if new areas are entered without an existing, appropriate HCVF assessment having been completed. An example includes a large forest concession where harvesting is initially limited to a smaller geographic scope.*

Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

☒	Not applicable; no significant issues identified that may impact the next audit.

**Note: information audit team leaders wish to remain confidential may be communicated directly to SCS.*

Appendix 5 – Forest Management Standard Conformance Table

Criteria required by FSC at every surveillance evaluation (*check all situations that apply*)	☐ NA – all FMUs are exempt from these requirements. ☐ Plantations > 10,000 ha (24,710 ac): 2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, and 10.8 ☒ Natural forests > 50,000 ha (123,553 ac) ('low intensity' SLIMFs exempt): 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, and 9.4 ☒ FMUs containing High Conservation Values ('small forest' SLIMFs exempt): 6.2, 6.3, 6.9 and 9.4
Documents and records reviewed for FMUs/ sites sampled	☒ All applicable documents and records as required in section 7 of audit plan were reviewed; or ☐ The following documents and records as required in section 7 of the audit plan were NOT reviewed (*provide explanation*):

Requirements Reviewed in Annual Evaluation

Evaluation Year	**Requirements Reviewed** (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.)
2017	All – (Re)certification Evaluation
2018	P5, P8, and mandatory criteria above.
2019	P1, P2, and P9; mandatory criteria
2020	P3, P4; mandatory criteria
2021	P6, P7; mandatory criteria

C= Conformance with Criterion or Indicator
NC= Nonconformance with Criterion or Indicator
NA = Not Applicable
NE = Not Evaluated

REQUIREMENT	**C/NC**	**COMMENT/CAR**
Principle #1: Compliance with Laws and FSC Principles **Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.**		

1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the ***Forest Management Unit*** (FMU).	C	UMPs present known cases of disputes over property ownership and/or property rights and efforts to resolve them. Boundary lines are maintained (inspected in the field on several occasions), and appropriate signs are posted and maintained. Gated roads and trails are common as confirmed by all site visits conducted in 2021. Gates and signs are used effectively to prevent unauthorized activities. Gates and signs were observed during on-site visits to regions visited in 2021. This FME maintains support from conservation officers and rangers who patrol the FME and from legal counsel.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	Environmental Conservation Officers (ECOs) and Forest Rangers are available for enforcement and are well-staffed. DEC maintains a robust staff of attorneys in Central Office and Regional Offices to pursue illegal actions and conflicts. The FME devotes considerable resources to the control of unauthorized access and activities on state forests. Despite some instances of small-scale dumping and unauthorized ATV use, no egregious examples of misuse of state forestlands were viewed during the 2021 surveillance audit.
Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	C	

2.3.a If ***disputes*** arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.	C	At the 2021 audit, NYSDEC staff confirmed that there are no current, active disputes related to tenure claims or use rights. Most tenure claims relate to property boundaries, but significant boundaries have all been surveyed and marked, so disputes usually are settled within the regions where the properties occur. If necessary, DEC has adequate legal staff to address more serious disputes; no disputes of this kind have occurred in recent years. Bureau Chief related several examples of ongoing trespass disputes and their resolution. Although not formal disputes, the UMP system includes Current Management Issues or otherwise sections of the plan to treat stakeholder issues.
2.3.b The forest owner or manager documents any significant disputes over tenure and use rights.	C	Files that document past disputes are available in regional offices were visited during the audit.
Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	C	
3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	Auditors interviewed State Forests UMP Coordinator in consulting and facilitations with Indian Affairs Coordinator, Office of Environmental Justice. Among other initiatives, the DEC conducts annual meetings with Indian Nations done by the Chief of the Bureau of Forest Resource Management. Overall, the NYSDEC maintains an exemplary system of tribal consultation. As confirmed via interviews with the abovementioned Coordinator, specific UMPs determine the targets and level of indigenous community outreach. Maps containing significant archeological sites, historical sites, and geographic point locations are located as layers on GIS and cross-referenced during harvest planning period. During the timber marking process, if areas within specific sales are contained within the timber sale, any additional follow-up work is determined.

		No significant alterations to management plans were recorded this year based on Indian Nations input.
3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	Commissioner Policy-42 outlines the Department's obligations and responsibilities as they relate to Indian Nation consultations and involvement in the UMP planning process. Annual meetings are held with the Indian Nations, during which the UMPs are addressed. UMP authors are meant to reach out to Ian Crisman (see staff listing in Appendix 1, above) prior to UMP creation. Consultation letters regarding the Tug Hill East UMP were reviewed by the 2021 audit team; no significant feedback was received.
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	C	
4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	NY State has a well-developed administration that establishes appropriate laws and regulations for safety, with conformance observed throughout the 2021 audit by BFRM employees. The BFRM has a health and safety system with policies and procedures that are well developed and largely understood by staff, as observed and confirmed through interviews during the audit. Several types of safety training are offered and completed by staff as confirmed by review of training records during the 2021 surveillance audit.
4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	C	Timber sale contracts and employee handbooks were examined during the audit to confirm that expectations for safety were specified. Auditors found consistency in the Notice of Sale requirements and compliance by the one contractor interviewed on site (see site notes). PPE is required per sales contracts, as is obeying all OSHA requirements. Workers' Comp and General Liability are also required of all contractors. Contractors interviewed displayed

		sufficient knowledge of safety requirements and duly practiced them, including all required PPE use. See also 4.2.a., above.
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	Logging contractors are the most common service providers. They are selected through well-established bidding processes with detailed contract provisions. Trained Logger Certification is a requirement in Timber Sale Contracts, required by NY state law. Interviews on-site and separate confirmations with logger training programs confirmed.
4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.	C	
4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: • Archeological sites and sites of cultural, historical and community significance (on and off the FMU; • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities;	C	This FME completed a Summary Report of the New York State Social Impact Assessment of State Land Management in 2012 that was based on a survey of user groups. As confirmed during the 2021 surveillance audit, this FME also maintains a system for notifying the public, receiving comments and incorporating comments into management plans and proposed activities. • Social impacts associated with archeological sites are minimized through consultation with tribal groups and consultation with Historic Preservation Officer for the Division of Lands and Forests, which maintains a database of known cultural sites and provides this information to staff during the Unit Management Planning process. This information is also incorporated into a GIS data layer as confirmed during a demonstration of the GIS system. The draft Strategic Plan for SF Management (beginning p. 157) includes sections on archeological, cultural, historical and community resources. • The draft Strategic Plan for SF Management includes sections on air, water and subsistence resources. UMPs incorporate further, local details into the text. • The draft Strategic Plan for SF Management (p. 146) and each unit management plan include a section on recreational, visual and aesthetic resources. Several

• Other people who may be affected by management operations. A summary is available to the CB.		complementary examples of these values were viewed during the 2021 surveillance. • The draft Strategic Plan for SF Management (p. 259) includes sections on supporting local communities. Each UMP incorporates additional, local details into the text (e.g., hunting and/or recreational access). • Providing Economic Benefits to the People of the State is Goal 4 of the Statewide Management Goals and is described on pp. 33-34 of the draft Strategic Plan. References to community economic opportunities are included in myriad sections of the Plan. A variety of timber harvest project sizes are designed to provide local opportunities including for example smaller ("local") sales, some of which were visited during the 2021 audit. • The Strategic Plan for SF Management includes sections on public/permitted uses, including for example universal access, motorized access for people with disabilities, formal and informal partnerships. The Summary Report of the New York State Social Impact Assessment of State Land Management was presented and reviewed and includes a review of the likely social benefits and concerns of management activities. As a state agency, BFRM relies on input from the public and to assess social impacts of resource management. Social impacts are addressed in the draft *Strategic Plan*, and in detail as UMPs are revised. A summary can be found on public DEC web pages.
4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.	C	NYSDEC maintains a system for notifying the public of proposed management activities and planning documents in conformance with the requirements of 4.4a and 4.4b. This step is completed during the draft planning process and again in each final plan. Written comments and FME responses are incorporated into Unit Management Plan documents. Throughout the 2021 site visits, FME responses were reviewed and reflected well on the agency's ability to consider input effectively. BFRM seeks input from the public at all levels of planning, especially in development of Unit Management Plans (public process discussed during audit in Regions 9 and 7). Stakeholder comments and responses are found in sections or appendices of each UMP.
4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they	C	During the past several years, no notable conflicts have occurred between NYSDEC and stakeholders. This FME maintains a system for notifying the public for example of proposed management activities. The DEC maintains a general stakeholder list for this purpose, which was shared with SCS during the 2021 audit. This step is completed during the draft

may express concern.		planning process and again in each final plan. Written comments and FME responses are incorporated into Unit Management Plan documents for example. FME responses were reviewed and confirmed the agency's ability to consider input effectively. Foresters interviewed on site visits indicated that they use judgment in determining the level of contact with nearby landowners prior to any harvesting activities. Most commonly, landowners observe activities of foresters during sale layout and take the initiative to inquire about planned management. Several examples were reviewed in folders for harvests examined during the 2021 audit.
4.4.d For ***public forests,*** consultation shall include the following components: 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.	C	1. This FME maintains a system for notifying the public for example of proposed management activities and planning documents. This step is completed during the draft planning process and again in each final plan. A draft schedule of harvest plans is included within each draft and final unit management plan. Kiosks are also used in some SFs and provide an opportunity for users to provide a response directly to SF staff. SFs offices are also open to the public and provide another accessible location for comment. 2. NYSDEC generally uses a 30-day public comment period. 3. NYSDEC's appeals processes are transparent and affordable. For example, the agency website includes a section for public involvement including several links that allow the public express opinions and concerns. 4. The DEC website (https://www.dec.ny.gov/lands/309.html) includes a pop-up that allows viewers to sign up for routine DEC updates. Written comments and FME responses are incorporated into Unit Management Plans, as reviewed during the 2021 surveillance audit. See 4.4a-c: BFRM staff are aware of the importance of consulting with the public. The DEC has clearly defined processes for appeals from the public. If applicable, UMPs include summary of public comments and responses to them, as reviewed during site visits this year.
Principle #5: Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
5.6. The rate of harvest of forest products shall not exceed levels	C	

which can be permanently sustained.		
5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan. The sustained yield harvest level calculation for each planning unit is based on: • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.	C	This FME is harvesting at a conservative rate as confirmed through review of AAC calculations and harvest data from 2015 (see 5.6.c for further information). This FME's harvest level is determined as part of the unit management plan process. The sustained yield calculation is based on inventory data that include: • As confirmed on p. 266 in The Strategic Plan for SF Management (2021 draft) and Estimating Periodic Annual Increment on SF Lands in New York (2010) and through interviews itemized elsewhere in this report, calculations were based on documented growth rates for acreages of each forest type/age class and species distribution. • As confirmed on p. 266 in The Strategic Plan for SF Management (2021 draft) and interviews itemized elsewhere in this report, calculations include mortality and decay. • As confirmed on p. 251 in The Strategic Plan for SF Management (2021 draft) and Estimating Periodic Annual Increment on SF Lands in New York (2010) and through interviews itemized elsewhere in this report, all forest acres were used to complete this growth and sustained yield harvest calculation. • Annual harvest levels are based on silvicultural practices on areas subject to harvests as described in each UMP. • Annual harvest levels accurately but conservatively reflect the management objectives and desired future conditions as described by each UMP, which include text and tables describing Management Objectives and Actions. The harvest level is conservative as confirmed through review of AAC calculations and harvest data from the past 10 years and p. 266 in The Strategic Plan for SF Management (2021 draft). Current harvests average around 43 million bf per year. Management units are defined by each region, and harvest schedules are planned for these units based on conditions in each stand and appropriate silviculture and desired future conditions. These plans do not set a sustained harvest level per se. As public lands, there is a history of harvesting less than the annual increment of growth in order to meet other management objectives. Periodically, DEC analyzes inventory data and confirms that harvest is well below annual growth. DEC had

		hoped to undertake a new analysis of PAI data in 2020, but this was not financially or logistically possible due to the COVID-19 pandemic. This analysis is now likely to occur in 2022 or shortly thereafter.
5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	C	This FME is harvesting at a conservative rate as confirmed through review of AAC calculations and harvest data from the past 10 years and p. 266 in the draft Strategic Plan for State Forest Management (2010). DEC has contracted analysis of Periodic Annual Increment (PAI) to researchers at SUNY-ESF, the first in 2010 and a follow-up in 2015. In both studies, the finding was that DEC is cutting considerably less than what is being grown. Current estimate is 25-30% of growth. See *Updating of Periodic Annual Increment on State Forest Lands in New York*, September, 2015. Auditors were presented with actual harvest data for the past year, confirming that harvesting has been conservative with regard to a sustained yield harvest level. NYSDEC had planned to undertake a five-year update to the PAI, but this was not logistically or fiscally possible, due to the COVID-19 pandemic. The FME plans to update the PAI in the near future (see also 5.6.a, above).
5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	C	NYSDEC's desired future condition includes the creation and maintenance of a variety of age and size classes within healthy high-quality stands. Significant early-successional habitat has been created through a variety of silvicultural treatments such as patch cuts and salvage operations.
5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary	C	NYSDEC's sole NTFP is maple syrup, harvesting levels of which demonstrably avoid depletion of its growing stock or other adverse effects to the forest ecosystem.

use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.		
Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.		
6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	C	
6.1.a Using the results of ***credible scientific analysis, best available information*** (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes: 1) Forest community types and development, size class and/or successional stages, and associated ***natural disturbance regimes***; 2) ***Rare, Threatened and Endangered (RTE) species*** and ***rare ecological communities*** (including plant communities);	C	Based on information from a variety of sources: 1. The Strategic Plan for SF Management (2021 draft) and each revised unit management plan includes descriptions of forest community types, size class and natural disturbance regimes. 2. Each revised unit management plan includes a list of RTE species and rare communities (Appendix B). 3. Each revised unit management plan includes a list of other habitats and species of management concern. 4. Each revised unit management plan includes a list of water resources, associated riparian habitat and hydrologic functions and maps (Appendix M). 5. Each revised unit management plan includes a description of the soils and maps (Appendix M). Each revised unit management plan includes a description of the historic conditions related to forest types, site class within the

3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) ***Soil resources***; and 6) ***Historic conditions*** on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.		introduction. The Strategic Plan For SF Management (2021 draft) includes a broad comparison of historic and current conditions.
6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a. The assessment must incorporate the ***best available information***, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.	C	The Strategic Plan for SF Management (2021 draft) states that the DEC Division of Mineral Resources is responsible for managing surface impacts from oil and gas exploration and development on SFs (p. 241). New surface disturbance has not occurred during at least the past 5 years. The Strategic Plan for SF Management (2021 draft) and each revised unit management plan includes an assessment of the short and long-term impacts of management activities. For example, each UMP reviewed at this year's site visits included a summary of proposed goals, objectives and management actions as well as the State Environmental Quality Review and negative determination. Draft UMPs currently open for public review are located at: https://www.dec.ny.gov/lands/4979.html#Public . The Strategic Plan for SF Management, each unit management plan and each SEQR cite policies, standards, plans, handbooks, management zones and each of these documents cite literature and experts. These assessments identify resources that will be impacted by management activities.
6.1.c Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and	C	Management prescriptions appropriately incorporate the impact assessment findings. Numerous sites examined during the 2021 audit were found to be in conformance with this indicator. For example, ash salvage sales are being planned and designed prior to, and during mortality events with specific regeneration plans in mind in order to maintain ecological viability of wetlands

long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.		containing ecologically appropriate species in replacement. See site notes.
6.1.d On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.	C	As confirmed via discussions with relevant NYSDEC personnel, the *Strategic Plan For SF Management* (2021 draft) and unit management plans are available to the public for comment on-line, on disk or as paper copies.
6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its	C	Natural Heritage Surveys have been completed in all regions. It is required for foresters to consult the GIS database of RTE species when planning a harvest; discussions with the Environmental Program Specialist (GIS database manager, State Forest Inventory Database (SFID) manager) during the 2021 surveillance audit confirmed that this had been done. A second database, Predicted Richness Overlay (PRO) has been developed by the Natural Heritage Program to predict sites that may include rare species and communities.

location should be reported to the manager of the appropriate database.		
6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. ***Conservation zones*** and/or ***protected areas*** are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.	C	In Regions 9 and 7, several examples were presented and discussed where measures were taken in planning and implementation of harvest to protect unique habitats and rare species. Personnel from the Natural Heritage Program and Bureau of Wildlife consulted on appropriate conservation measures to protect RTE species and communities. Timber harvesting is the only significant activity that may occur within or near protected areas. Implementation of BMPs, adequate buffers and monitoring occur when conducting inventory, writing prescriptions and designing harvests. Significant oversight of harvesting activities is adhered to for protecting these sensitive areas, as confirmed via interviews with FME personnel and staff foresters.
6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.	C	The Strategic Plan for SF Management (2021 draft) contains landscape-level, statewide habitat assessments that include historical and existing conditions, as well as stressors (where applicable) and trends, which in turn informs the Statewide Gap Assessment (p. 62) and the Ecoregional Landscape Assessment (p. 71). These two assessments will guide NYSDEC management and operational plans over the next decades. Some of these feature the recovery of rare species. BFRM and Bureau of Wildlife collaborate frequently on biodiversity goals and monitoring, so it should be expected that recovery efforts would be coordinated.
6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and	C	DEC's Conservation Officers are well equipped to enforce the many state and federal regulations pertinent to this indicator. Gated roads are maintained to restrict vehicle access in many places, as observed on numerous occasions during the 2021 surveillance audit. Collecting materials from state forests is

communities (See Criterion 1.5).		regulated through Part 190 of the Environmental Conservation Law and the Temporary Revocable Permitting process. No serious threats to ecosystems due to illicit hunting, fishing, trapping, etc. have been identified by the NYSDEC.
6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	
6.3.a. Landscape-scale indicators	C	
6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented ***successional*** stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	Ecoregional Landscape Assessments, in the draft *Strategic Plan*, present summaries of landscape assessments for seven ecoregions in the state. Land cover and age-class distributions were examined. UMPs build on the *Strategic Plan* and provide details of current and planned distributions of forest types and age classes. According to the *Strategic Plan*, early successional forest types tend to be the most under-represented stages on State Forests and have declined appreciable since approx. 1980. NYSDEC intends to integrate this knowledge into its site-specific management plans in order to meet early successional habitat needs, including by creating clearings for desired species and age diversity.
6.3.a.2 When a ***rare ecological community*** is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, ***conservation zones*** and/or ***protected areas*** are established where warranted.	C	Rare communities are part of the Natural Heritage database and are treated in the same manner as rare species during harvest planning and management.

6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all ***Type 1*** and ***Type 2 old growth***. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate). Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g). On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to	C	Old-growth stands are found almost exclusively within the Forest Preserve system which is owned and managed by this FME but is not part of this FME's certified land base. As part of the Forest Preserve system, these old growth stands are protected from harvesting and other timber management activities. Where other old-growth stands are found, they are classified as HCVF and protected from harvest. Late successional forests are either managed to maintain their character or protected from negative impacts from harvesting, weather, pests and pathogens.

maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate). On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where: 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected.		
6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.	C	Habitat for wildlife is a major objective for BFRM, as confirmed by examining both the draft *Strategic Plan* and various UMPs. Wildlife biologists from Bureau of Wildlife are often housed with BFRM personnel and participate in UMP development. Conversations with an ecologist from the NY Natural Heritage Program confirmed that restoration of habitat conditions is a major initiative of the Bureau, and that implementation continues to be successful. Most recently, the “young forest initiative” of the Wildlife Bureau addresses the relative paucity of early-successional habitat on the landscape, the rectification of which is a stated management objective in several UMPs.

		FME staff have implemented treatments for the establishment of early successional habitat to benefit grouse by releasing aspen. Staff have also worked with Division of Fish and Wildlife to enhance New England cottontail habitat and have buffered nesting sites for Goshawk and other known raptors found on State Forests, as viewed and discussed during the 2021 surveillance audit.
6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent ***aquatic habitats***; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.	C	RMZs are addressed in DEC's *Rules for Special Management Zones*. Guidelines are clear, but there is an often-used exemption for intrusions into buffer zones in cases where existing or former trails or roads still exist. Exemptions are addressed in each stand prescription and are approved at a regional level. Several examples of aquatic habitat provisions within harvested stands were observed in both regions visited during the 2021 surveillance audit. See *DEC Division of Lands and Forests Management Rules for Establishment of Special Management Zones on State Forests* (SMZ Rules), published December 2015.
Stand-scale Indicators **6.3.d** Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.	C	Management plans and harvest prescriptions address plant species composition. Site conditions are routinely used to determine appropriate species. This FME's clear-cut policy and plantation policy provide direction toward natural species distributions. As existing plantations mature and are converted to a mix of native species UMPs and the draft *Strategic Plan* emphasize the importance of using an analysis of site conditions to determine management goals and objectives for forest types. Field visits confirmed efforts to promote natural regeneration.
6.3.e When planting is required, a local source of known provenance is used when available and when	C	The state nursery provides planting materials from local sources (e.g., NYS DEC Saratoga Tree Nursery) when supplemental

the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. ***Native species*** suited to the site are normally selected for regeneration.		planting is used, though this is uncommon. Some planting of Norway spruce (*Picea abies*) continues and has been documented to be non-invasive in this region. See also Policy *ONR-DLF-1 Plantation Management on State Forests.*
6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, ***snags***, and well-distributed coarse down and dead woody material. ***Legacy trees*** where present are not harvested; and b) vertical and horizontal complexity. Trees selected for ***retention*** are generally representative of the dominant species found on the site.	C	The 2021 draft *Strategic Plan for State Forest Management* and this FME's retention policy include guidelines for these habitat features. These guidelines have also been integrated into revisions of each unit management plan. Importance of these habitat elements has been described at length in the draft *Strategic Plan* and is covered in UMPs. Field foresters interviewed during the audit are aware of these habitat elements are able to demonstrate trees marked for retention to protect such habitat components. Examples were evident in most field sites visited. See also Policy ONR-DLF-2 Retention on State Forests. NYSDEC's policy is to leave ca. 4 snags or legacy trees per acre. These trees are marked with a "W" (for "Wildlife") as observed in various examples throughout the 2021 surveillance. More than adequate DWD also observed, thanks to whole-tree skidding methods viewed throughout audit.
6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when ***even-aged systems*** are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.	C	More than half of the harvesting on state forests is even-aged, and a number of examples were provided during site visits. See site notes. The FME has addressed this topic in detail and developed two relevant policies: ONR-DLF-2, Retention on State Forests and ONR-DLF-3, Clearcutting on State Forests (both policies issued in 2011).

In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.		
6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan: 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the ***best available information*** including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal	C	Departures from opening sizes have not been requested.

opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.		
6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control ***invasive species***, including: 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.	C w/ OBS	Risks of invasive species are articulated in both the *Strategic Plan* and in recently prepared UMPs. The DEC has *Bureau of Invasive Species & Ecosystem Health* which continues to monitor and control the establishment and spread of exotic and invasive species, including EAB. Timber sales occurring within the EAB Quarantine zone are subject to additional contractual requirements regarding movement of ash products, as reviewed during the 2021 surveillance audit. Invasive species were discussed at length during each site visit during the 2021 surveillance audit. NYSDEC contends with a number of invasive species, including knotweed, stiltgrass, swallow-wort, honeysuckle, and many others. Given the intractable nature of invasives within the state, and the extent to which they are already established, the efficacy of NYSDEC's actions in limiting these species' spread is limited. NYSDEC personnel routinely monitor invasives' spread during pre- and post-harvest operations and thereby demonstrate conformance with the requirements of this indicator. However, the audit team feels that there are opportunities to enhance BFRM's invasive management strategies, including but not limited to implementing a consistent monitoring protocol across all regions of the state and communicating the importance of these efforts to contracted forest workers. **See also OBS 2021.1.**
6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	Prescribed burning is used occasionally on state forests, most often to maintain openings for wildlife. A burn permit is required. Wildfires are very rare, but when they do occur BFRM is equipped to participate in suppression. The most recent example of a large wildfire occurred in 2015; the fire burned mostly in a pitch pine-chestnut oak forest, a fire-dependent community. No prescribed burns were visited during the 2021 surveillance audit.

6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.	C	
6.4.a The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the ***landscape*** (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) ***GAP analyses***; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups. For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.	C	The NYSDEC draft *Strategic Plan*, scheduled for finalization by the beginning of 2022, contains extensive landscape analyses that in turn inform the UMPs. Examples of draft UMPs containing direct references were reviewed during the 2021 audit, including the Niagara Frontier UMP and the Fulton County State Forests UMP.
6.4.b Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.	C	Many RSAs are in the Forest Preserve, wildlands in the Adirondack and Catskill Mountains. Although the 2.8 million acres+ in these preserves identified as HCVF are not part of the certified database, they are managed by DEC and partners and contributed to goals for representation.

Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.		
6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.	C	Many of the communities identified as RSAs are in Forest Preserves, so management activities are minimal, mostly directed toward recreation, protection against pathogens, etc. Upon questioning by auditors, no examples of RSAs being managed for harvest were provided, and also no examples of road construction within RSAs. Guidance for staff is found on internal DEC web pages and was viewed by auditors.
6.4.d The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.	C	RSA delineation is clear within the draft *Strategic Plan*, scheduled for finalization by early 2022; see section titled "Landscape Assessment Process" (p. 47).
6.4.e Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	C	NYSDEC maintains the largest Forest Preserve system in the country, protected by an 1894 amendment to the state constitution.
6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road	C	

construction, and all other mechanical disturbances; and to protect water resources.		
6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	Written evidence was reviewed during the audit, including contract language found in sections VI, VII, and VIII; Streamside *Management Zone* (SMZ) *buffer* management guidelines; Forest Retention Guidelines; Rutting Guidelines for Timber Harvests, and New York State Forestry Best Management Practices.
6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	C	As confirmed during field site visits described elsewhere in this report, harvest operations in general meet or exceed BMPs including wetland crossings observed at several sites. See site notes.
6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when	C	• Slash was uniformly distributed throughout as confirmed at nearly all sites visited in 2021. See site notes. • Topsoil disturbance was minimal as confirmed at sites described elsewhere in this report. Timing restrictions were used effectively in some of these examples. • The Rutting Guidelines for Timber Harvests • Best management practices are used effectively to minimize soil erosion as demonstrated at sites visited during this audit program and described elsewhere in this report. Timing restrictions and other BMP tools are used effectively. Evidence of accelerated soil erosion was checked and not found. • The use of fire as a management tool is uncommon in this region. • Natural ground cover was maintained and observed in completed operations as confirmed at sites visited during this audit program and described elsewhere in this report. Timing restrictions were used effectively in at least some of these examples. • Whole tree harvesting is not common in this region and was not observed during this audit. • Low-impact equipment options are not widely available in this region. Other methods including for example timing restrictions are used to mitigate impacts.

consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate.		
6.5.d The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes: • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms;	C	The existing transportation system is adequate for most management needs. Transportation is addressed in each UMP revision process, but a review of several UMPs shows and emphasis on maintenance and not new construction. No newly constructed haul roads or skid roads were observed during the 2021 surveillance audit. One recreational trail enhancement project was viewed, at Hammond Hill SF, at which broad based dips were noted for being well constructed and appropriately spaced. BMPs are routinely followed, as determined by field observation. Gates and signs are widely used to prevent unwanted vehicle access.

• impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated.		
6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written ***Streamside Management Zone*** (SMZ) ***buffer*** management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers. In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.	C	NYSDEC has written guidelines for *Special Management Zone* (SMZ) buffers and BMPs that include vegetative buffer widths and protection measures. These guidelines include specific measures to protect for example water quality, wetlands, vernal pools, seeps and springs, lake and pond shorelines and including explicit limitations associated with activities that can and cannot occur within each SMZ. For example, main skid trails are not allowed within 100’ of a vernal pool and construction of main haul roads are avoided within 250’ of a vernal pool. In association with vernal pools, crown cover retention has been developed. Numerous examples of successful SMZ techniques were viewed throughout the 2021 surveillance audit (see site notes).
6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments,	C	Minor variations from stated minimum SMZ widths have not been implemented.

wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.		
6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of ***aquatic habitat.*** Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.	C	As confirmed during field observations the number of stream and wetland crossings have been minimized and avoided in other cases. This FME's SMZ policy refers to the New York State Forestry BMPs for Water Quality Field Guide as well as stream crossing permit procedures. Several examples were observed during 2021 site visits that included installation of culverts, bridges, or temporary site crossings. See site notes.
6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	C	Gates and signs are used effectively to prevent unauthorized activities, despite a background level of illicit activity particularly from ATV use. This FME maintains support from conservation officers and rangers.
6.5.h Grazing by domesticated animals is controlled to protect in-	C	This FME does not allow grazing.

stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.		
6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.	C	
6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).	C	Prior to the audit, BSLM submitted a full listing of chemicals used on the FMU since the last audit. NYSDEC has adapted national-level ESRAs for Glyphosate, Imidacloprid, Imazapyr, Triclopyr, Metsulfuron-methyl, and Sulfometuron-methyl, in accordance with the requirements of the FSC-POL-30-001.
6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling	C	a-d) Herbicides are used to control undesirable competing vegetation and non-native invasive plants; other effective methods are not available. Management actions are required to conform to this indicator and plans for chemical use must undergo a SEQR review. For example, the SEQR alternative analysis and thresholds for invasive species are described in the draft Strategic Plan for State Forest Management (p. 313) and includes the application of all components of an integrated pest management system including the use of chemicals when all other options have been exhausted (item a and item c). The draft Strategic Plan for State Forest Management includes a written strategy with alternative options to the use of chemicals.

invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.		Pages 311-313 of the Plan includes a description of 5 alternatives to the use of chemicals to control interfering vegetation (do nothing, hand pulling, chainsaw removal, mechanical removal and fire). When herbicide treatments for silvicultural operations are used, contract language specifies licensed applicators and a SEQR review is required. The policy on clearcutting addresses management designed to reduce dependence on chemical treatment.
6.6.c Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.	C	Where herbicides are used, ground application is the most common method of application, and licensed applicators are required. A number of BSLM foresters and technicians hold pesticide application licenses (several examples of this were reviewed during the 2021 surveillance audit). Overall, pesticide use is small-scale and designed to combat invasive species.
6.6.d Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks,	C	The draft *Strategic Plan* (section Invasive Species Control Methods, p. 309) details the DEC's IPM protocols and specifies that chemical application will be conducted according to and approved Pesticide or Herbicide Application Plan written for each specific instance of application. Written prescriptions are part of each unit management plan; examples were viewed at each harvest site. Herbicide

and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.		treatments are applied by New York State Certified Pesticide Applicators using the most conservative application methods; licenses were reviewed from a sample of applicator personnel. Only ground applications are used by this FME. The management system is designed to conform to this indicator and plans for chemical use undergo a SEQR review; plans include maps and are approved and monitored at the regional offices.
6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.	C	Monitoring occurs during inventory and at periodic intervals following. Records of pest occurrences, control measures and worker exposure to chemicals are maintained in unit management plans and at the regional offices. Control measures are generally described in the draft Strategic Plan for State Forest Management (2010) pp. 304-305. See also discussion under **6.3.h.**
6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C	
6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	C	Timber sales contracts (*Notice of Sale* Section XIV) specify that contractors will be responsible for control and collection of any fluids leaking from equipment on site. Spill kits are required of all operators and must be on site; adequate spill kits were observed at the one active site visited during the 2021 surveillance. TLC training includes procedures for preventing and containing spills.
6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	See above. No spills observed during visits to field sites in 2021 audit.

6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	A chemical storage cabinet was observed at the Dunkirk (Region 9) office. Chemicals are stored in leak-proof containers; evidence of leaks was checked and not found. Sites visited during the 2021 audit were not close to any ecologically sensitive sites; hazardous materials were stored in a supply trailer on one site and in the operator's truck on another site. No significant hazardous material leaks were observed.
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	NA	
6.8.a Use of ***biological control agents*** are used only as part of a pest management strategy for the control of invasive plants, ***pathogens***, insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.	NA	This FME does not currently use biological control agents.
6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.	NA	This FME does not currently use biological control agents.
6.8.c If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and	NA	This FME does not currently use biological control agents.

internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.		
6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose	NA	This FME does not use GMOs.
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a The use of ***exotic species*** is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	Norway spruce, Scotch pine, and Larch are the only exotic species deliberately established on NYSDEC lands. Planting is not widely used for regeneration. The state nursery provides planting materials that are from local sources when supplemental planting is the preferred option. Norway spruce is planted in limited, but declining quantities. Managers have determined through experience and document review that this species is considered non-invasive in this landscape.
6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	Planting stock is acquired from the state nursery, including provenance. Success of planting and any evidence of invasion are monitored during the inventory process.
6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	BFRM's Plantation Policy (*Strategic Plan*) is to move away from planting for regeneration, but Norway spruce has been successful on some sites where natural regeneration is not adequate for successful restocking. Monitoring is conducted on a case-by-case basis with staff assigned to State Forest Management. State-wide monitoring

		and control of invasive, exotic species is conducted by the newly formed Bureau of Invasive Species & Ecosystem Health.
6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.	C	
6.10.a Forest *conversion* to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	There is no conversion of natural forest to plantations. To the contrary, an estimated 60% of plantation harvests are being converted to natural forest.
6.10.b Forest *conversion* to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	No conversion has occurred on HCVF.
6.10.c Forest *conversion* to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be	C	There has been no recent mineral development; very few new roads; and a few landings that have become openings.

conformed with for conversion to be allowed).		
6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.	C	BFRM has a written policy (ONR-DLF-1) not to convert natural forest stands to plantations. No such conversion was witnessed during the 2021 surveillance audit.
6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)	C	UMPs reviewed during the 2021 audit did not include any plans for land-use conversion. Stand-type conversions are done mostly to meet requirements of biodiversity and natural stand dynamics.
6.10.f Areas converted to *non-forest use* for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.	C	Mineral exploration and leases have not occurred on State Forest lands since FSC certification. This subject has been thoroughly addressed in recent years, however, and is clearly addressed in the draft Strategic Plan (see "Mineral Resources" section).
Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.		
7.1. The management plan and supporting documents shall provide:	C	

a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands. **b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.** **b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.** **i) Description and justification of harvesting techniques and equipment to be used.**		
7.1.a The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.	C	The legal status of each parcel of state forest land is maintained by the Bureau of Real Property, but UMPs provide detailed maps of each parcel and an appendix that lists any easements, boundary disputes, etc. UMPs are easily searchable, publicly available on the NYSDEC website, and contain the information that demonstrates conformance to this indicator.
7.1.b The management plan describes the history of land use and past management, current forest types and associated	C	As confirmed by review of applicable UMPs during the 2021 surveillance audit, comprehensive descriptions of land use, history, and current state of the landscape are found in UMPs.

development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).		More general discussions of natural disturbance regimes are found in the *Strategic Plan*.
7.1.c The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.	C	Review of several UMPs confirms that each addresses current and desired future conditions, historical conditions, and management objectives and plans. The *Strategic Plan* also contains this information on a higher-level, statewide basis.
7.1.d The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.	C	The draft *Strategic Plan* includes a landscape assessment (page 44) as well as a table of ecoregional habitat assessments. UMPs present more detailed data on landscape condition.
7.1.e The management plan includes a description of the following resources and outlines activities to conserve and/or protect: • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9);	C	UMPs include lists of RTE species and natural communities and proposed management for those species and habitats, where appropriate. Likewise, soil and water resources are detailed in each plan (e.g., pages 10-11 of the Rapid Water Unit UMP) as are other types of special management areas. See Criterion 6.4 and Principle 9, respectively, for discussion of RSAs and HCVFs. The *Strategic Plan* also addresses at-risk species, natural communities, and blocks of matrix forest.

• Other special management areas.		
7.1.f If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).	C	The *Strategic Plan* provides policies and guidelines for managing invasive species (see *Invasive Species* section). UMPs also include information regarding control of invasive species, as confirmed in UMPs applicable to sites visited in 2021. See also discussion under **6.3.h.**
7.1.g The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).	C	Similar to invasive plants, the *Strategic Plan* has general guidelines, with more specific mention of insects and diseases in the UMPs, as appropriate.
7.1.h If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.	C	The *Strategic Plan* has detailed policies and guidelines for use of chemicals. These are further addressed in some UMPs (e.g., Rapid Water UMP). Chemical treatments are covered more comprehensively in the ESRA documents developed in order to show conformance with FSC-POL-30-001. See also discussion under Criterion 6.6.
7.1.i If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.	C	The draft *Strategic Plan* addresses Forest Health and includes guidelines for integrated pest management and biological controls under the Sections "Active Management Guidelines" and "Forest and Ecosystem Health." At this time, no biological controls are being used on NYSDEC lands.
7.1.j The management plan incorporates the results of the evaluation of social impacts, including: • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial,	C	NYSDEC has an extensive staff of public affairs personnel, in the central office and in regional offices. Solicitation of input from the public and analyses of public comments is a major effort in development of UMPs. Special efforts are made to solicit participation by Indian Nations, as confirmed via interviews with NYSDEC personnel during the 2021 audit. Responses to comments submitted by the public are included in appendices of UMPs.

archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g).		
7.1.k The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).	C	UMPs routinely address issues of access, both for vegetation management and public use. Appendices list details about easements and rights-of-way and tables present needed maintenance and new construction, usually with a timetable for each project. The transportation system is well documents in the agency's GIS system.
7.1.l The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.	C	The Strategic Plan for SF Management (2021 draft) describes silvicultural systems used on state forests and their purposes (pages 93-97). UMPs vary in the detail presented, but usually provide tables of stands scheduled for harvest and the system to be employed.
7.1.m The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.	C	The Strategic Plan for SF Management (2021 draft) (beginning page 266) describes harvest rate calculations and references the analysis of periodic annual increment. UMPs generally do not address harvest rate calculations in detail because management is oriented toward achieving desired future conditions and not desired levels of harvest.
7.1.n The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	C	Monitoring of various forest qualities is mentioned throughout the Strategic Plan for SF Management (2021 draft). At the tract level, UMPs address monitoring in different sections of the plans, as well. The inventory and monitoring handbook is

		a guide for forest-stand monitoring. Forest health is monitored in cooperation with the Bureau of Invasive Species and Ecosystem Health.
7.1.o The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.	C	As reviewed during the 2021 surveillance audit, maps are included as Appendices of all unit management plans and are a key part of soliciting public comments on draft UMPs.
7.1.p The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.	C	Any specifications relating to harvest machinery and technique would be found at the level of a stand prescription and/or the advertised Request for Bids. Due to the variable nature of equipment needed at the state and regional levels, specific stand prescriptions describe precautions that need to be employed and allow logging contractors to determine their bids and equipment accordingly.
7.1.q Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.	C	Harvest plans are routinely prepared to address site conditions, biodiversity concerns, cultural considerations, safety, etc. Files of such plans were reviewed as auditors visited sites in regions 7 and 9 at the 2021 surveillance audit.
7.1.r The management plan describes the stakeholder consultation process.	C	The stakeholder consultation process is described in each unit management plan, confirmed by inspection of two plans selected for this audit.
7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	C	
7.2.a The management plan is kept up to date. It is reviewed on an	C	The Strategic Plan for SF Management (2021 draft), which was made available for auditor review during the 2021 surveillance

ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.		audit, is set for imminent release pending final peer review (this process was somewhat delayed due to the COVID-19 pandemic). This will replace the current Strategic Plan for State Forest Management (2010) and includes up-to-date scientific and technical information. The task of writing and updating unit management plans is assigned on the basis of a schedule and this FME's management plans are current and in conformance with the FME's own schedule for plan completion.
7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	Foresters hold professional degrees and have been provided with a variety of guidance documents and further trained for example in HCVF protection, BMPs, Rutting Guidelines and a variety of publications in relation to silvicultural prescriptions as confirmed through interviews and document review. During the 2021 surveillance audit, forestry staff in regions 7 and 9 demonstrated exceptional knowledge of elements contained within the Strategic Plan, the UMPs, and the state BMPs.
7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	Unit management plans are available free of charge on the FME's website and in either paper or electronic form at regional offices and at public meetings. The Strategic Plan for SF Management (2021 draft) is currently under development and will be made widely publicly available as soon as it is published – likely at the end of 2021 or beginning of 2022.
7.4.b Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for	C	The Strategic Plan for SF Management, unit management plans, revisions and supporting documentation are available free of charge on the FME's website and in either paper or electronic form at regional offices and at public meetings. Public comments

public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.		and plan modifications are noted within The Strategic Plan for SF Management (2021 draft) beginning on p. 362. Additionally, such modifications were included in the UMPs examined during the audit.
Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts. *Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.*		
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	As confirmed through review of the SFID database and interviews itemized elsewhere in this report, this FME's inventory includes items a-f.
8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	Monitoring is carried out for several exotic insect pests and diseases. Intensive monitoring is being done for Emerald Ash Borer with pre-salvage and salvage harvests resulting, which has begun severely affecting ash populations in the western portion of the state.

8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	BFRM maintains records of harvest volume, product, species and acreage. Summary reports are generated each quarter and were inspected during the audit as verified with SFID coordinator.
8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: 1) Rare, threatened and endangered species and/or their ***habitats***; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4).	C	Data associated with RTEs is primarily completed by Natural Heritage Program staff with assistance from foresters and are supplemented by Natural Heritage Program's existing data. This data provides one method to identify historic locations of RTE species. Secondly, workshops have been designed and implemented to train forest management staff to supplement these inventories with the aid of predictive species overlays. Evidence that these methods of data acquisition have been implemented include: 1. RTE lists are contained in Appendix B of each Unit Management Plan. 2. Common and rare plant communities are described in included in draft Strategic Plan for SF Management (p. 55) and in a sample of UMPs examined during the 2021 audit. 3. Resource maps that include HCVF delineations have been distributed to each region and observed in regions 7 and 9 during the 2021 surveillance audit. 4. Foresters and NHP maintain a list of sites and visit sites classified as HCVF to monitor changes (see Criterion 9.4, below). Data associated with RTEs is primarily gathered by Natural Heritage Program staff with assistance from foresters who have received training in recent workshops. Interview with Natural Heritage staff confirmed trainings. Trainings also confirmed by documentation of agendas with dates and topics covered. The Bureau of Wildlife conducts assessments of vertebrate species, with emphasis on RTE and game species. Rare plant communities are monitored by NHP; forest types by BFRM. Invasive species are monitored, as needed, on a regional basis, mostly as a product of the extensive field work done by foresters. See also Criterion 9.4.
8.2.d.1 Monitoring is conducted to ensure that site specific plans and	C	Foresters normally visit harvesting sites weekly to monitor compliance with harvest plans and conditions of the Notice of

operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.		Sale, and monitoring records are maintained for 1-, 3-, and 5-years post-harvest. Records were reviewed during the 2021 surveillance audit for all sites visited.
8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	Per interviews during the 2021 annual surveillance audit, the Operations Division of DEC maintains most roads on state forests and keeps records in a GIS data layer. UMPs provide an accounting of roads, needs for improvements, and plans for additional roads. Many roads in State Forests are town or county roads and therefore beyond the jurisdiction of the NYSDEC.
8.2.d.3 The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	NYSDEC completed studies related to socio-economic values of forests including the Department published the Statewide Forest Resources Assessment & Strategy (2010) and "New York State Industrial Timber Harvest Production and Consumption Report-2011". BFRM periodically contracts for studies of socio-economic impacts and has utilization and marketing specialists on staff. As a public agency, numerous branches of government monitor some elements of this indicator.
8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.	C	BFRM conducts formal outreach to stakeholders as UMPs and *Strategic Plans* are prepared and revised. They also do so when new policies, e.g., extraction for natural gas, are developed and debated. Stakeholders are invited to attend open houses, visit regional offices, telephone, or send email messages in order to make their opinions known.
8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	Sites of tribal significance are not known to occur on state forests (interview with David Witt and Ian Crisman), although tribal representatives are regularly invited to comment on management plans and their revisions.
8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	As confirmed through the review of quarterly reports and the annual total harvest.xls spreadsheet and individual contracts itemized elsewhere in this report, this FME maintains records including for example harvest volume, product, species and acreage. The cost of management is monitored as described during interviews with Chief of BFRM during the final day of the 2021 surveillance audit. The information that has been collected is sufficient and has been used to assess productivity and

		efficiency of harvest projects. As a public agency, costs and revenues are carefully monitored, and summary statistics are found on the DEC web pages. As confirmed through the review of quarterly reports and the annual total harvest.xls spreadsheet and individual contracts itemized elsewhere in this report, the information that has been collected is sufficient and has been used to assess productivity and efficiency of harvest projects.

Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

High Conservation Value Forests are those that possess one or more of the following attributes:

- **a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance**
- **b) Forest areas that are in or contain rare, threatened or endangered ecosystems**
- **c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)**
- **d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).**

Examples of forest areas that *may have* high conservation value attributes include, but are not limited to:
Central Hardwoods:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >160 years old (a)
- Municipal watersheds –headwaters, reservoirs (c)
- Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)
- Intact forest blocks in an agriculturally dominated landscape (refugia) (a)
- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)

• Hemlock-dominated forests (b) • Pine stands of natural origin (b) • Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a) • Fens, particularly calcareous fens (c) • Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c) • Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern (b) *Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.* *In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.* *Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.* *Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.* *Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.*		
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	Interviews with NYSDEC staff and visual examination of GIS databases confirmed that regular monitoring of HCV attributes occurs by the FME and other DEC bureaus. Results are documented and recorded in relevant GIS HCVF data layers. The GIS data layers and recent relational database records of monitoring were demonstrated for the audit team during this audit program.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or	C	Management actions related to HCV attributes were reviewed. None were associated with increasing risk.

enhance that attribute, and adjusts the management measures in an effort to reverse the trend.		
Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.		

Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table

☒ Chain of Custody indicators were not evaluated during this evaluation.

Appendix 7 – Trademark Standard Conformance Table

1. General Requirements for Use of the FSC Trademarks (FSC "checkmark-and-tree" logo, initials "FSC," and/or name "Forest Stewardship Council")	

Trademark uses reviewed:

Trademark Application (on-product/promotional)	Case Approval #, or Email (include approver name & date), or other appropriate documentation	Are all elements correct? (e.g., trademark symbol, color scheme, size, etc.) If not, describe in Nonconformities below.
(see table below)		Y ☒ N ☐
		Y ☐ N ☐
		Y ☐ N ☐
		Y ☐ N ☐

Customer Request History

Case#	Submitted Date	Status	RequestType	Job#	Job Name	Site Name	Created By	Approver
224354	02/14/2018	Approved	Off-Product					Jogreet Chadha
223878	02/05/2018	Approved	Off-Product			Central office		Jogreet Chadha
221386	12/18/2017	Approved	Off-Product					Jogreet Chadha
160484	04/06/2016	Approved	Off-Product			Central Office		Henry Alvarez

☒ All known uses reviewed.

☐ Sample reviewed. Rationale that sample choice is sufficient to confirm requirements are met:

☐ Trademark uses detected include those grandfathered in under prior FSC trademark rules (e.g., FSC-TMK-50-201). Place the initials "GF" by the specific Trademark Applications above. *Note: This only applies to printed items or physical promotional materials (e.g., hats, load tickets) in stock. New*

printings, items, and websites must be updated per FSC-STD-50-001 requirements. If the organization only has GF uses and no new uses, the rest of this checklist is NA.	
1.2 Trademark License Agreement and valid certificate In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. *Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.*	Maintained on file by SCS Main Office
Evidence 1.2: Maintained on file by SCS Main Office.	
1.6 Product Group List The products intended to be labeled or promoted as FSC certified have been included in the organization's certified product group list.	☒ C ☐ NC ☐ C w/ OBS
Evidence 1.6: ☒ Refer to Product Groups List in Public Summary Report; ☐ The following nonconformance(s) were detected in Product Groups: ; or ☐ Refer to OBS related to Product Groups:	
1.3 Trademark License Code The FSC trademark license code assigned by FSC to the organization accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.	☒ C ☐ NC ☐ C w/ OBS
1.4 Trademark Symbol The FSC logo and the 'Forests For All Forever' marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to 'FSC' and 'Forest Steward-ship Council' at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). *NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.*	☒ C ☐ NC ☐ C w/ OBS ☐ NA, one or more of noted exceptions applies
2.1 Restrictions on using FSC trademarks The organization **has not used** the FSC trademarks in the following ways: a) in a way that could cause confusion, misinterpretation, or loss	☒ C ☐ NC ☐ C w/ OBS

of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the organization, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as 'FSC Golden Timber' or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.	
2.2 Translations The name 'Forest Stewardship Council' has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)	☐ C ☐ NC ☐ C w/ OBS ☒ NA, no translations
Evidence 1.3, 1.4, 2.1, and 2.2: ☒ Refer to Trademark uses reviewed above; ☐ The following nonconformance(s) were detected ; or ☐ Refer to OBS:	
Sections 8 and 9 Graphic Rules The organization has only used FSC logos that conform to the standard requirements governing: • color and font (8.1-8.3); • format and size (8.4-8.9); • label placement (8.10); and • 'Forests For All Forever' marks (9.1-9.7).	☒ C ☐ NC ☐ C w/ OBS
1.5 Trademark Use Approval The organization has submitted all intended uses of the FSC trademarks to SCS for approval. OR The organization has **an approved trademark use management system** in place. (If the organization has a trademark use management system, complete Annex A.)	☒ C ☐ NC ☐ C w/ OBS
4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.	☐ C ☐ NC ☐ C w/ OBS ☒ NA, trademarks no used for segregation marks
Evidence Graphic Rules, 1.5, and 4.6: ☒ Refer to Trademark uses reviewed above; ☐ The following nonconformance(s) were detected ; or ☐ Refer to OBS:	

2. On-Product Use of FSC Trademarks
☒ NA, no use of on-product trademarks (*on-product checklist may be deleted*)

3. Promotional Use of FSC Trademarks
☐ NA, no use of promotional trademarks (*promotional checklist may be deleted*)

6.1 Catalogues, Brochures, and Websites When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply: • It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc. • If both FSC-certified and uncertified products are listed then a text such as "Look for our FSC®-certified products" shall be used next to the promotional elements and the FSC-certified products shall be clearly identified. • If some or all of the products are available as FSC certified on request only, this is be clearly stated.	☒ C ☐ NC ☐ C w/ OBS ☐ NA, not using trademarks in catalogues/ brochures/websites
6.2 Sales and Delivery Documents When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: "Only the products that are identified as such on this document are FSC certified". *NOTE: Use of the FSC claim and certificate code on the invoices does not qualify as FSC trademark use.*	☐ C ☐ NC ☐ C w/ OBS ☒ NA, not using trademarks on templates for FSC & non-FSC products
6.3 Promotional Items All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.	☐ C ☐ NC ☐ C w/ OBS ☒ NA, not labeling promotional items
6.5 Trade Fairs When the FSC trademarks are used for promotion at trade fairs, the organization has: a) clearly marked which products are FSC certified, or b) add a visible disclaimer stating "Ask for our FSC®-certified products" or similar if no FSC-certified products are displayed. *NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.*	☐ C ☐ NC ☐ C w/ OBS ☒ NA, not using trademarks at trade fairs
Section 6.6 and 6.7 Investment/Financial Claims 6.6 When investment companies or others are making financial claims based on the organization's FSC certified operations, the organization has taken full responsibility for the use of the FSC trademarks.	☐ C ☐ NC ☐ C w/ OBS ☒ NA, not making financial claims about FSC status

6.7 Any such claims have been accompanied by the disclaimer, "FSC is not responsible for and does not endorse any financial claims on returns on investments."	
7.1 and 7.2 Other Forestry Certification Scheme Logos The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.	☒ C ☐ NC ☐ C w/ OBS ☐ NA, not using other scheme logos
7.3 Business Cards The FSC trademarks have not used on business cards to promote the organization's certification. The FSC logo or 'Forests For All Forever' marks are not used on business cards for promotion. A text reference to the organization's FSC certification, with license code, is allowed, for example "We are FSC® certified (FSC® C######)" or "We sell FSC®-certified products (FSC® C######)".	☐ C ☐ NC ☐ C w/ OBS ☒ NA, approval granted prior to July 1, 2011
7.4 Promotion with CB Logo FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.	☒ C ☐ NC ☐ C w/ OBS
Evidence 6.1-6.3, 6.5-6.7, 7.1-7.4: ☒ Refer to Trademark uses reviewed above; ☐ The following nonconformance(s) were detected ; or ☐ Refer to OBS:	

Annex A: Trademark use management system
☒ NA, not using a trademark management system (*Annex A checklist may be deleted*)

Annex B, Additional trademark rules for group FM certificate holders
☒ NA, not a group FM certificate or group does not use FSC trademarks (*Annex B checklist may be deleted*)

Appendix 8 – Group Management Program

☒ This is not a group certificate, so this appendix is not applicable.