



December 27, 2007

Dave Forness
Division of Lands and Forests
Environmental Conservation, NYS Dept. of
625 Broadway, 5th Floor
Albany, NY 12233-4255

Dear Mr. Forness

The NSF Certification Board has approved the Audit Team's recommendation and the New York State Forest System of the Division of Lands and Forests is now certified to the SFI Standard. Your SFI certificate will arrive separately.

It has been a pleasure serving you and your organization in providing you with Sustainable Forestry Initiative® certification services.

Sincerely,

A handwritten signature in black ink that reads "Michael Ferrucci". The signature is written in a cursive, flowing style.

Michael Ferrucci, NSF

Copy: Justin Perry

SFI CERTIFICATION AUDIT REPORT

**Sustainable Forestry Initiative® Standard
2005-2009 Edition**



for

New York Division of Lands and Forests

December 7, 2007

**Mike Ferrucci
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SFI Public Audit Report

The Green Certification Program of the New York State Department of Environmental Conservation (DEC); Division of Lands and Forests, Bureau of State Land Management (BSLM) has achieved conformance with the SFI Standard®, 2005-2009 Edition, according to the NSF-ISR SFIS Certification Audit Process.

Program Description:

The DEC Division of Lands and Forests is responsible for New York's extensive system of forest preserves, support for good management of private lands, real property services including handling property conveyances for varied categories of lands (fee and easement), and the management of State Forests. The DEC Green Certification Program is managed by Justin Perry, Green Certification Coordinator.

The Division and Bureau are incorporated within the DEC, run by an appointed DEC Commissioner. Appointees with direct line authority over the implementation of land management programs also include a Deputy Commissioner, Assistant Commissioner and 9 Regional Directors.

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

- 1) Office of Natural Resources – Christopher Amato, Assistant Commissioner
 - a. Division of Lands and Forests – Robert Davies, Director
 - i. Bureau of State Land Management – Dave Forness, Chief
 1. State Forest Section – Robert Messenger, Section Chief
 - a. Green Certification Coordinator – Justin Perry, Forester 2

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

- 2) Office of Natural Resources – Christopher Amato, Assistant Commissioner
 - a. Division of Lands and Forests – Robert Davies, Director
 - i. Bureau of Real Property – John Keating, Chief
(Responsible for land acquisition program and conducting land surveys)
 - b. Division of Fish, Wildlife & Marine Resources – Patricia Riexinger, Director
(State Land Foresters rely on this Divisions expertise when developing policy and management decisions on State Forests)
- 3) Office of Regional Affairs & Permitting – Michael Lenane, Deputy Commissioner
 - a. Region 3-9 – Regional Directors
 - i. Natural Resources 3-9 – Natural Resource Supervisors
 1. Forestry 3-9 – Regional Forester
 - a. State Land Foresters
(Regional supervision of State Land Foresters)
- 4) Office of Public Protection – Henry Hamilton, Assistant Commissioner
 - a. Division of Forest Protection & Fire Management – Tom Rinaldi, Director
 - i. Forest Rangers by Region

(Responsible for enforcement of the Environmental Conservation Law on State Forests)

5) Office of Administration – Jack McKeon, Deputy Commissioner

a. Division of Operations – Mark Malinoski, Director

i. Bureau of Maintenance & Technical Services – Roland Ozols, Chief

(Perform construction and maintenance on State Forests as requested by the State Land Foresters and develop policy/technical specifications for bridges, and dams.)

* *“The Division’s other three bureaus manage and protect the 2.7 million acre Adirondack Forest Preserve and the 288,000 acre Catskill Forest Preserve; promote good forest stewardship practices among private landowners, communities and the forest industry; and handle all land conveyance transactions for the Department.”* Source: DEC Web site

The BSLM has primary responsibility for the management of the resources on State Forests, including the harvesting and sale of State-owned timber. The BSLM manages close to two million acres of land. Certification pertains to approximately 750,000 acres of State Forests in Regions 3-9. An additional 7,000 acres of state forests in Regions 1 and 2 were excluded because these lands are not subject to timber harvesting. The management focus for these “out of scope” lands is on restoration of grasslands (Region 2 in New York City) or maintenance of the Pitch Pine/scrub oak type (Region 1 within Long Island’s Nassau and Suffolk Counties).

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

Source: <http://www.dec.ny.gov/lands/4982.html>

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

In practice the management of all three categories of land is integrated into a single program that recognizes the distinct but related legislative mandates described above. The program’s main activities are as follows:

- Timber sales (revenue sales and local sales)
- Non-Commercial forest stand improvement / TSI
- Tree planting
- Habitat management
- Recreation trail development or rehabilitation
- Infrastructure development or improvement
- Accessibility projects
- Temporary Revocable Permit activity (land-use permits)
- Adopt-A-Natural-Resource activities (volunteers)
- Unit Management Planning Efforts

The primary timber types managed include northern hardwoods, oak, lowland conifer, and planted conifers, either pure or in mixture with hardwood trees. Many of the planted stands of conifers, once the dominant feature of the reforestation lands, are being allowed to gradually transition to native hardwood species, with sugar maple, oaks, red maple, birches, beech, cherry and associated other species most commonly found. Selection silviculture is favored for the maple-birch-beech type, and various forms of shelterwood systems favored for oak-dominated stands. Stands containing cherry component are treated with both systems according to local practices and site-specific conditions. Norway spruce stands are the most stable of the planted types; many such stands are in superb condition, having undergone periodic, timely thinning. Most of the remaining planted stands, which can include pure or mixed areas of Scotch pine, white pine, white spruce, larch, and some hardwoods, are in fair to poor condition. Lack of markets (in the past) and lack of personnel (currently) for requisite partial harvests are the main reason these other stands have declined in health and vigor. Most planted stands, regardless of past management attention and/or health and vigor status, are on course to develop a more natural composition and structure.

The BSLM, working in cooperation with other agencies and with volunteers (groups and individuals) has established a remarkable infrastructure for recreational use of State Forests. This includes day use and overnight camping areas, varied and extensive trails for many uses, interpretive areas (nature trails, informational kiosks), and accompanying maps and brochures. Effective use of volunteer efforts through the “Adopt-a-Natural-Area” (AANR) program has contributed to the management of recreation resources and in other ways. Many accessibility projects that emphasize making State Forests available to all citizens and visitors are particularly noteworthy, comprising a national model for other states to emulate. Management of recreational use and related infrastructure has taken much time away from basic land management.

Over the past decade New York State has protected over 1,000,000 additional acres of forestland, mostly through the use of working forest conservation easements. This remarkable program has come at a cost; many staff responsible for managing State Forests in an era of rapidly increasing recreational use have also been tapped to help assess potential forestland acquisitions.

Audit Scope and Requirements

The audit was performed by NSF-ISR on May 14 through May 21 by an audit team headed by Mike Ferrucci, NSF-ISR Lead Auditor. The other members of the audit team were Mr. Sterling Griffin, Forester; Dr. Dave deCalesta, Wildlife Biologist; and Ms. Kathryn Fernholz, Social Scientist, Audit team members fulfill the qualification criteria for conducting SFIS Certification Audits contained in the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) 2005–2009 Edition.

The scope of the SFIS Audit included land management operations; procurement-related requirements under Objective 8 were excluded because New York does not procure wood for a mill. Forest practices that were the focus of field inspections included those that have been under active management since January 1, 2006. Practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example). In addition, SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were within the scope of the audit.

The objective of the audit was to assess conformance of the BSLM Green Certification Program to the requirements of the Sustainable Forestry Initiative® Standard, 2005-2009 Edition

(<http://www.sfiprogram.org/sfistandard.cfm>). The standard set of indicators was utilized; none of the indicators were modified.

Several of the SFI requirements were outside of the scope of the BSLM Green Certification program and were excluded from the scope of the SFI Certification Audit as follows:

- Indicator 3.2.5, because New York has published Best Management Practices (BMPs).
- Indicator 11.1.4: “Adherence to all applicable federal, state, & provincial regulations and international protocols for research & deployment of trees derived from improved planting stock & biotechnology.” Because trees planted are not from improved planting stock; and
- Indicators 12.6.1: “Prompt response to the SFI annual progress report” and “12.6.3: “Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI Standard”, because this is a new program and thus there are no past reports to submit or to file.

SFIS Audit Process

NSF-ISR initiated the SFIS audit process with a Readiness Review to confirm the scope of the audit, review the SFI Indicators and evidence to be used to assess conformance, verify that New York Division of Lands and Forests was prepared to proceed to the SFIS Certification Audit, and to prepare a detailed audit plan. NSF-ISR then conducted the SFIS Certification Audit of conformance to the SFI Standard. A report was prepared and final approval was done by an independent Certification Board Member assigned by NSF. Follow-up or Surveillance Audits are required by the 2005-2009 Sustainable Forestry Initiative Standard ®. The initial Surveillance Audit is scheduled for late spring or early summer, 2008.

The actual NSF-ISR SFI Certification Audit was governed by a detailed Audit Plan designed to enable the audit team to determine conformance with the applicable SFI requirements. The plan included detailed provisions for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

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

The possible findings of the audit included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the SFIS. Major Non-conformances had to be closed, and plans developed for Minor Non-conformances, before a recommendation could be made for certification. These tasks were completed by November 28, 2007 through exchange of documents and phone calls.

Overview of Audit Findings

The BSLM Green Certification Program was found to be in conformance with the SFIS Standard. The NSF-ISR SFI Certification Audit Process determined that there were two Major Non-conformances and seven Minor Non-conformances. The Major Non-conformances, which were addressed and closed, involved the formal commitment to the SFI Program and management review that includes direct line

managers responsible for implementation of the forestry program. Management review remains the subject of a new minor non-conformance (NYSLM- SFI-2007-09).

The Division of Lands and Forests has prepared corrective action plans for the seven Minor Non-conformances. The non-conformances are described below, including the closed Majors.

Minor Non-conformance NYSLM- SFI- 2007-01

SFI Indicator 1.1.1: “A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including: ...f. recommended sustainable harvest levels; and g. a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).”

Description: Although most required topics are covered by other types of analysis, Management Plans are not complete and there was not a schedule with resources identified to complete these plans in a timely manner. New plans are used to update the allowable harvest levels consistent with the current ecosystem management approach. Considering areas lacking Unit Management Plans, evidence was not presented that the 1991 Annual Allowable Cut determination is still reliable.

Major Non-conformance NYSLM- SFI-2007-02 (Closed)

SFI Indicator 10.1.1: “Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters.”

Description: No formal statement of commitment had been circulated throughout the organization. This was remedied with a formal memo from the DOC Commissioner providing the commitment to both SFI and FSC. The SFI Licensee agreement was completed as well. Note: formerly NYSLM-2007-03 Minor CAR Readiness Review, Albany

Major Non-conformance NYSLM- SFI-2007-03 (Closed)

SFI Indicator 13.1.3: “Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.”

Also Indicator 10.1.2: “Assignment and understanding of roles and responsibilities for achieving SFI Standard objectives.”

Description: An SFI management review had not been documented, and had not included management with direct line authority to determine changes and improvements. Evidence was ultimately provided that the managers with direct line authority to implement corrective actions have been included within the SFI program. Note: formerly NYSLM-2007-02 Minor CAR Readiness Review, Albany

Minor Non-conformance NYSLM- SFI-2007-04

SFI Indicator 10.1.4: “Contractor education and training sufficient to their roles and responsibilities.”

Description: There were no formal training requirements for loggers.

Minor Non-conformance NYSLM- SFI-2007-05

SFI Indicator 2.3.4 “Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, ...)”;

SFI Indicator 2.3.2 “Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.” and

SFI Indicator 2.3.6 “Criteria that address harvesting and site preparation to protect soil productivity”

Description: Deep rutting and extensive soil compaction were observed at five sites visited by the team. Modest to severe rutting was found on sites in nearly every office (sub-region) visited. Rutting criteria (see Indicator 2.3.6) either are not clear, are not enforced consistently, or are not accepted by field foresters. Processes to identify soils vulnerable to compaction and use of avoidance methods (see Indicator 2.3.2) may be inadequate.

Minor Non-conformance NYSLM- SFI-2007-06

SFI Indicator 3.1.1: “Program to implement state or provincial equivalent BMPs during all phases of management.”

SFI Indicator 3.1.4: “Monitoring of overall BMP implementation.”

Description: At a recently repaired stream crossing on the Public Forest Access Road in Broome Tioga 2 (Beaverdam Forest) the outlet of the repaired culvert crossing of the first and largest stream is perched above the pond below the road forming a barrier to the passage of aquatic organisms. NY State Best Management Practices for Water Quality state “avoid disrupting migration or movement of aquatic organisms” (page 38) and “culverts should not cause damming or pooling” (page 43). BMP monitoring does not cover roads or local sales.

Minor Non-conformance NYSLM- SFI-2007-07

SFI Indicator 2.4.2: “Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.”

Description: Overstocking due to delayed thinning has led to diminished vigor of planted conifers and some subsequent insect problems.

Minor Non-conformance NYSLM- SFI-2007-08

SFI Indicator 10.1.3: “Staff education and training sufficient to their roles and responsibilities.”

Description: Foresters are quite competent and many have maintained current with science and practice, which are rapidly expanding. However foresters are not consistently trained in or knowledgeable about topics within their full scope of roles and responsibilities under the ecosystem management approach adopted by the Bureau of State Land Management. Further, there is no BMP training for road construction/ road grading staff.

Minor Non-conformance NYSLM- SFI-2007-09

SFI Indicator 13.1.3: “Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.”

Description: The management review system has not been in place long enough to ensure that all SFI issues are covered in the review.

The Bureau of State Land Management has developed plans to address these issues. Implementation of the corrective action plans for the Minor Non-conformances is expected within one year of the field audit, or May 2008. Implementation of the corrective action plans for the Minor Non-conformances will be reviewed during the first surveillance audit. Continued progress in these areas will be reviewed in subsequent surveillance audits, generally scheduled at one-year intervals.

Opportunities for Improvement

Seven opportunities for improvement were also identified, and included:

SFI# “Indicator” / Finding

- 1.1.3 “A forest inventory system and a method to calculate growth.”
 There is an opportunity to improve the methods for estimating growth.
- 2.3.5 “Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area.”
 There is an opportunity to improve in the area of residual stand damage.
- 3.2.4 “Identification and protection of nonforested wetlands, including bogs, fens, vernal pools and marshes of significant size.”
 There is an opportunity to improve methods to identify wet areas within harvest blocks and prevent avoidable damage caused by logging equipment.
- 4.1.3 “Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies.”
 There is an opportunity to improve the consistent use of the heritage database. (Note: This also relates to Indicator 4.2.1.)
- 4.1.5 “Assessment, conducted individually or collaboratively, of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities, where practical and when consistent with management objectives.”
 There is an opportunity to improve habitat evaluation/enhancement, including small scale and landscape level assessments, by consistently implementing the most successful approaches to comprehensive landscape analysis across regions.
- 13.1.1 “System to review commitments, programs, and procedures to evaluate effectiveness.”
 There is an opportunity to improve the system for reviewing programs.
- 13.1.2 “System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures.”
 There is an opportunity to improve the system for reporting information to management specific to achieving certification objectives and performance measures.

These findings do not indicate a current deficiency, but served to alert the Bureau of State Land Management to areas that could be strengthened or which could merit future attention.

Exceptional Practices

As described above, forest certification highlights the issues requiring additional attention to ensure long-term sustainable forest management. The audit team obtained evidence, including documentation and interviews with internal and external stakeholders, of persistent understaffing leading to challenges in fully implementing its forest management program. These are best summarized in Report 2006-S-9 by the Office of the New York State Comptroller, Division of State Services “State Forest Timber Sales”:

As of May 2006 three additional foresters were hired by the Bureau. While these additional staff should help the Bureau in its efforts to meet its various forest management goals, the new staffing level (36 foresters) is still short of what it was in 2001 (46 foresters).”

Despite these challenges, NSF-ISR also identified many areas where forestry practices and operations on New York Division of Lands and Forests’ lands exceed the basic requirements of the SFI Standard. These are listed below, with the requirement shown first, and then the exceptional practice or result:

4.1.6 “Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership.”

The NY DEC Division of Lands and Forest does an exceptional job of supporting and participating in plans and programs for the identification, conservation, maintenance, and development of old-growth forests.

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

The NY DEC Division of Lands and Forests provides training and other aides (brochures, pamphlets) for its staff and publics regarding identification, location, spread, and treatment of exotic plants and animals in an effort to limit introduction, impact and spread of invasive plants and animals. The DEC SLM participates in experimental programs designed to identify best practices for controlling spread of invasive exotic plants and animals and supports research designed to identify, survey, and control exotic invasive plants and animals. Where necessary, spot treatment of invasive exotic plants is conducted using integrated pest management. These activities exceed the SFI requirement for working to control exotic invasive species.

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

4.2.1 “Collection of information on critically imperiled and imperiled species and communities and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.”

The NY DEC Division of Lands and Forests has in place a comprehensive program to identify and locate critically imperiled and imperiled species, their habitats, and significant natural communities through collection of requisite field data, interviews with local experts, and information provided by its field staff.

4.2.2 “A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.”

The use of research regarding biodiversity and ecosystem protection exceeds the standard.

5.1 “Program Participants shall manage the impact of harvesting on visual quality.”

5.1.1 “Program to address visual quality management.”

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

Plans and implementation of projects result in superb visual quality results.

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

The NY DEC Division of Lands and Forests identifies and protects known special sites, and makes efforts to find new sites for protection.

12.1.4 “Participation in efforts to support or promote conservation of working forests through voluntary market-based incentive programs.”

New York State’s efforts to protect working forests from development through the use of working forest conservation easements are outstanding. The NY DEC Division of Lands and Forest has lead responsibility for the monitoring of the extensive network of such protected lands.

12.2.3 “Recreation opportunities for the public, where consistent with forest management objectives.”

New York State’s efforts to provide recreational opportunities within the working forests, including reforestation areas and multiple use areas exceed the requirements of SFI.

The NSF-ISR audit team commends the dedicated staff of the BSLM in their efforts to manage these remarkable forest resources.

Relevance of Forestry Certification

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

1. Sustainable Forestry

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

2. Responsible Practices

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

3. Reforestation and Productive Capacity

To provide for regeneration after harvest and maintain the productive capacity of the forestland base.

4. Forest Health and Productivity

To protect forests from uncharacteristic and economically or environmentally undesirable wildfire, pests, diseases, and other damaging agents and thus maintain and improve long-term forest health and productivity.

5. Long-Term Forest and Soil Productivity

To protect and maintain long-term forest and soil productivity.

6. Protection of Water Resources

To protect water bodies and riparian zones.

7. Protection of Special Sites and Biological Diversity

To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that takes into account their unique qualities and to promote a diversity of wildlife habitats, forest types, and ecological or natural community types.

8. Legal Compliance

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

9. Continual Improvement

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

Source: Sustainable Forestry Initiative® (SFI) Standard, 2005–2009 Edition

For Additional Information Contact:

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END OF PUBLIC REPORT

Other Required Information

Note: The remaining portions of this SFI Audit Report are not part of the Public Report and may be kept confidential at the discretion of the SFI Program Participant. This additional information is required by SFI protocols.

Audit Team

The audit team is fully qualified to conduct the SFI Certification Audit, with an understanding of the forest industry, certification requirements of the SFI Standard, and of sustainable forestry practices within your region. Qualifications of audit team members are described in the Audit Plan (attached as Section A).

Confidentiality

NSF requires all auditors to adhere to strict agreements regarding confidentiality and prohibiting consulting during audits. A copy of this agreement is available from NSF-ISR on request.

Scope of Audit

The scope statement to appear on the certificate is as follows:

Forest management for State Forests managed by the Bureau of State Land Management in Regions 3-9, including Reforestation Areas, Multiple Use Areas, and Unique Areas, and related activities in support of sustainable forestry.

NSF-ISR SFI Audit Process and Reporting

The NSF-ISR Audit Report consists of all documents used in the audit process, including the Readiness Review, the Tentative Audit Plan, and the Certification Audit documents. The findings of the Readiness Review Report including the Document Review were provided previously.

The actual NSF-ISR SFI Certification Audit was governed by a detailed Audit Plan that was prepared specifically for your SFI Audit. The Audit Plan is included here as Section A (with various Attachments). The Audit Plan was focused on helping the audit team determine whether there were any deficiencies and inconsistencies between your SFI Program and the SFIS requirements that apply to your organization.

As described in the Audit Plan, the objective of the audit was to assess conformance of your SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2005-2009 Edition. The possible findings of the audit included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the SFIS. The detailed spreadsheets addressing the above findings are contained in the SFI Certification Audit Matrix (Section B). Any non-conformances were fully documented and reported using the NSF-ISR Corrective Action Request forms (Section C).

NSF-ISR also identified a number of forest practices and operations that exceed the basic requirements of the SFI Standard. These practices are documented in the SFI Certification Audit Matrix and summarized in the Public Report section. Your organization is to be commended for performance above and beyond the basic requirements of the SFIS in the areas specified.

Certification Process

The following paragraphs, excerpted from NSF-ISR's SFI Certification Procedures Document, provide Definitions / Process Related to Non-conformances.

Major Non-conformance

8.2.2 Pending SFIS Certification may also be recommended where there are one to nine outstanding major non-conformances. The Program Participant will generally be allowed 60 days within which to develop a corrective action plan to address deficiencies identified in the Corrective Action Request(s).

8.2.2.1 The corrective action plan(s) shall be sent to the lead auditor and will be immediately reviewed to determine if the proposed corrective action is appropriate. The lead auditor will notify the Program Participant that the proposed plan is appropriate, or indicate the deficiencies in the plan. When the plan has been approved by the lead auditor, the Program Participant will implement the plan and notify the lead auditor that it has been implemented.

Note: Major Non-conformances must be closed or downgraded to Minor Non-conformances prior to certification.

Minor Non-conformance

8.2.1 Pending SFIS Certification may be recommended where there are outstanding minor non-conformances, but corrective action plans have not been developed by the Program Participant and approved by the lead auditor during the SFIS Certification Audit.

8.2.1.1 The Program Participant will generally be allowed 60 days within which to develop corrective action plans for outstanding minor non-conformances to address the deficiency identified in the Corrective Action Request. These corrective action plans shall be sent to the lead auditor and will be immediately reviewed to determine if the proposed corrective action is appropriate.

Note: Minor Non-conformances must be closed at the time of the first annual surveillance audit. The corrective action plan can take more than 1 year to implement provided there is a clear plan and timeline for resolution, implementation is clearly underway, with resources identified to implement the corrective action plan.

Completing the Certification

After the process steps outlined above are followed, and assuming that the audit team's recommendation for certification is approved by NSF-ISR's Certification Board, a final report and certificate will be issued. The complete Final Report is the sole property of your organization and will be treated with the utmost confidentiality and privacy. The report is intended for use by your organization in understanding your conformance with the SFI Standard and for purposes of improving your SFI Program. NSF-ISR may provide copies of the report to audit team members.

The Public Audit Report section is intended for public disclosure. The 2005–2009 Edition Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) require you to provide the public summary to SFI, Inc. two weeks prior to making any public claims regarding successful independent certification of conformance with the SFI Standard. The public report will be posted on the SFI website and available for public review. The Lead Auditor may, at your direction, provide a copy of the final SFI Audit Summary to SFI.

NSF-ISR will issue a formal Certificate of Conformance to the SFI Standard to your organization. The Certificate includes the NSF-ISR Logo, your organization's name, the standard certified to, the date of the certification, and signatures of responsible authorities.

Follow-up or Surveillance Audits are required by the 2005-2009 Sustainable Forestry Initiative Standard ®. The Surveillance Audits can be conducted in the continuous or standard format. The initial Surveillance Audit is scheduled for late spring or early summer, 2008. The assigned lead auditor will contact you 2 months prior to this date to reconfirm and begin preparations.

Certification Report Sections:

- Section A Readiness Review Report and Audit Plan
- Section B SFI Certification Audit Matrix
- Section C Audit Itinerary
- Section D NSF-ISR Corrective Action Request (CAR) forms



Section A
Readiness Review Report and Audit Plan



April 30, 2007

Thomas Wolfe, Forester 4
Division of Lands and Forests
NYS Dept. of Environmental Conservation,
625 Broadway, 5th Floor
Albany, NY 12233-4255

Re: SFI Readiness Review Report

Dear Mr. Wolfe:

NSF-ISR, supported by our joint audit partner firm Scientific Certification Services, has completed the Readiness Review of New York State Department of Environmental Conservation's SFI program. Despite some evidence gaps and 4 Minor Non-conformances I believe that your program is sufficiently prepared to proceed with the SFIS Certification Audit. If you have any questions regarding the results of the Readiness Review or the process for developing corrective action plans to resolve non-conformances, please feel free to call me at 203-887-9248.

During our Readiness Review visit we made plans for the SFIS Certification Audit tentatively scheduled for May 14 through May 21. Please confirm that these dates are still appropriate.

A draft version of the Tentative Audit Plan for the upcoming audit is enclosed as Attachment 3 of the Readiness Review Report. This plan details the tentative schedule and conduct of the SFIS Certification Audit. Please review and confirm the details contained in the Tentative Audit Plan and contact me if you would like to recommend any changes. I'll work closely with the SCS Lead Auditor on the FSC side to ensure that the needs of both evaluations are met using this single audit plan.

Once again, thank you for selecting NSF-ISR to provide high quality SFIS certification services.

Sincerely yours,

A handwritten signature in black ink that reads "Michael Ferrucci". The signature is written in a cursive, flowing style.

Michael Ferrucci, Lead Auditor

Enclosures:

cc: NSF CB Reviewer; Sterling Griffin, SCS Lead Auditor, Dave Wager, SCS



Readiness Review Report

Sustainable Forestry Initiative® Standard

April 30, 2007

A. New York DEC Division of Lands and Forests FRS #: 6L741

B. NSF Audit Team: Lead Auditor: Michael Ferrucci; SCS Co-Lead Auditor Sterling Griffin

C. Audit Dates: April 25-27, 2007

D. Corrective Action Requests (CARs) Issued During the RR: Major: 0 Minor: 4

The CARs are provided in Attachment 3. The Program Participant must take appropriate corrective action prior to the Certification Audit.

NYSLM-2007-01; NYSLM-2007-02; NYSLM-2007-03; NYSLM-2007-04;

E. Audit Team Recommendation:

Continue SFIS Certification Process.

The SFIS Certification Audit has been tentatively scheduled for May 14-21, 2007

Program Participant has major non-conformances that will be resolved prior to the SFIS Certification Audit. The following CARs require proof of corrective action implementation:

Program Participant has major non-conformance(s) that will not be resolved prior to the SFI Certification Audit. Client is advised to correct the deficiencies and submit a Corrective Action Plan to the lead auditor for approval prior to initiation of the SFIS Certification Audit.

Corrective Action Plans should be forwarded to: (Lead Auditor Name and Address)

E. Scope of the SFIS Certification:

The scope of the organization includes:

Forest Management Only Wood Procurement Only Forest Management and Procurement.

The specific SFIS Performance Measures and Indicators that are outside the scope of the Program Participant’s SFI Program are described in Attachment 1 “Readiness Review Summary Sheet”.

The wording of the scope of the SFIS Certification as described on the NSF Facility Record Sheet (FRS) has been reviewed with a representative of the Program Participant. The proposed scope (select)

Is correctly listed on the FRS form

Has been modified as follows:

Forest management for New York State Forests in Regions 3-9, including Reforestation Areas, Multiple Use Areas, and Unique Areas, and related activities in support of sustainable forestry.

F. Proprietary Issues: Are there any proprietary issues? (e.g., restricted access to areas of the site; restricted access to information such as attorney-client privileged compliance documents, etc.)

Yes No If Yes, please explain:

G. Agreement Not to Disclose and Consult:

All findings and reports generated as a result of the RR visit are confidential as described in the NSF-ISR Policies for Confidentiality and the Agreement to Not Disclose and to Not Consult.

H. Readiness Review Summary:

The SFIS Readiness Review (RR) visit was performed at the organization’s Albany office. Participants included the SFI management representative and SFI team. The primary objectives of the review were to define the audit scope, define audit criteria, determine if the Program Participant is ready to continue with the NSF-ISR SFIS Certification process, and develop an audit plan.

1. During the RR visit the lead auditor reviewed the following items with the Program Participant’s management representative:

- NSF SFI Procedures The SFIS Certification Audit Matrix
- Safety Awareness Issues Population of Field Sites for Inspection
- Provided Corrective Action Requests Identified Interviewees
- The Composition of the Audit Team and the need for any Special Expertise
- Reviewed the Program Participant’s SFI Program and supporting documentation
- Drafted the Audit Plan Completed the Audit Plan

2. The review conducted by the lead auditor confirms the following items:

- Program Participant (PP) has customized indicators to demonstrate conformance with the SFI Standard? If checked, attach SFIS indicators documents to the SFIS Audit Plan.
- PP has sufficient documentation of SFIS Conformance to proceed with the Audit.
- PP’s SFI Program appears to address each of the SFIS Performance Measures and Indicators that apply, with exceptions noted in Appendices 1 and 2.
- PP has notified the Sustainable Forestry Board that it is initiating independent certification. No License as yet; informal notification only.
- At least one BMP Monitoring and Management Review cycle has been completed, in part (CAR 2).
- Other Issues or Comments: Bureau of State Land Management must document SFI Management Review to avoid a Major Non-conformance. Further, the indicators listed in Appendix 1 as “Objective Evidence Incomplete” should receive attention prior to the audit.

Appendices:

- Appendix 1 Readiness Review Summary Sheet
- Appendix 2 Corrective Action Requests (CARs)
- Appendix 3 Tentative SFI Audit Plan
 - Appendix 3-1 Qualifications of Auditors
 - Appendix 3-2 Potential Field Sites
 - Appendix 3-3 Potential Interviewees

Appendix 1



NSF-ISR SFI Readiness Review Summary Sheet 2005-2009 Sustainable Forestry Initiative Standard ®

Reviewed by: Michael Ferrucci

Date of Review: April 27, 2007

Program Participant Name and Location: NY Bureau of State Land Management, New York State

Clause	Performance Measure Description	Indicators Which Do Not Apply	*Evidence Sufficient to Proceed	**Objective Evidence Incomplete
Objectives 1 to 7	Requirements for Land Management			
1.1	Sustainable Long-Term Harvest Levels		All	
2.1	Reforestation		All other	2.1.3
2.2	Minimize Use of Chemicals		All	
2.3	Forest & Soil Productivity		All	
2.4	Forest Protection		All	
2.5	Genetically Improved Planting Stock		All	
3.1	Best Management Practices		All	
3.2	Riparian Protection Measures	3.2.5	All other	
4.1	Conservation of Native Biodiversity		All	
4.2	Application of Research & Science		All	
5.1	Visual Quality of Harvests		All	
5.2	Clear-cut Size, Shape, Placement		All	
5.3	“Green Up” or Alternative Methods		All	
6.1	Identification & Management of Special Sites		All	
7.1	Efficient Utilization		All	
Objective 8	Requirements for Procurement	N.A.		

Clause	Performance Measure Description	Indicators Which Do Not Apply	*Evidence Sufficient to Proceed	**Objective Evidence Incomplete
	Requirements for All Program Participants (unless out of scope)			
Objective 9	Requirements for Research, Science, & Technology			
9.1	Funding for Research		All	
9.2	Analysis of Regeneration, Cut/Drain, BMP Implementation, & Biodiversity Information		All	
Objective 10	Requirements for Training and Education			
10.1	Training of Contractors and Personnel		All other	10.1.1, 10.1.2
10.2	Improved Wood Producer Professionalism		All	
Objective 11	Requirements for Legal & Regulatory Compliance			
11.1	Forestry Law/Reg. Compliance System	11.1.4	All other	
11.2	Social Law Compliance		All	
Objective 12	Requirements for Public & Landowner Involvement			
12.1	Cooperative Efforts for Sustainable Forestry		All	
12.2	Outreach, Education, Involvement		All	
12.3	Public Lands Planning Involvement		All	
12.4	Public Lands Conferring with Native Peoples		All other	12.4.1
12.5	Inconsistent Practices or Concerns		All	
12.6	Annual Reporting	12.6.1, 12.6.3	12.6.2	
Objective 13	Requirements for Management Review and Continual Improvement			
13.1	Management Review System			All

* Does not indicate conformance.

** Auditor and Program Participant must discuss the process for compiling sufficient evidence prior to audit.

Appendix 2



Corrective Action Requests (CARs)

Note: The following CARs are listed as of the date of the readiness review. Revisions and additions were made during the audit. The full list of CARs appears at the end of the report.

Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Readiness Review, Albany</u> Discussed with: <u>Central Office Staff</u>	Date: <u>April 27, 2007</u> FRS # <u>6L741</u> CAR Number: <u>NYSLM-2007-01</u> Previous CAR Number/Date: _____ Nonconformance Type (underline): Major <u>Minor</u>
---	--

AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 1.1.1

Description: “A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including: ...f. recommended sustainable harvest levels; and g. a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).”

Minor Non-conformance: Although most of the required issues are covered by other types of analysis, Unit Management Plans are not complete, but these plans are an important part of meeting sub-indicators f. and g. There is not a clear timeline with resources identified to complete these plans. Note: Based on additional information during the audit, the team may change this to an “Opportunity for Improvement” OFI.

IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

1) ROOT CAUSE ANALYSIS BY COMPANY—Include potential causes & assurance problem does not exist in other areas.

2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

AUDITOR REVIEW OF COMPANY’S PLAN:

STATUS: _____ AUDITOR/DATE: _____

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

STATUS LEGEND:
Plan or Implementation rejected

OPEN = CA Plan Accepted

CLOSED = CA implemented, verified & accepted

REJECTED = C/A

Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Readiness Review, Albany</u> Discussed with: <u>Central Office Staff</u>	Date: <u>April 27, 2007</u> FRS # <u>6L741</u> CAR Number: <u>NYSLM-2007-02</u> Previous CAR Number/Date: _____ Nonconformance Type (underline): Major <u>Minor</u>
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AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard®, Indicator 13.1.3: “Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.”

Description: Although the bureau is working towards certification and has made a good start, the management review has not been documented. This would be expected prior to start of audit to avoid a Major Non-conformance.

IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

1) ROOT CAUSE ANALYSIS BY COMPANY—Include potential causes & assurance problem does not exist in other areas.

2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

AUDITOR REVIEW OF COMPANY’S PLAN:

STATUS: _____ AUDITOR/DATE: _____

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

STATUS LEGEND:

rejected **OPEN** = CA Plan Accepted **CLOSED** = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation

Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Readiness Review, Albany</u> Discussed with: <u>Central Office Staff</u>	Date: <u>April 27, 2007</u> FRS # <u>6L741</u> CAR Number: <u>NYSLM-2007-03</u> Previous CAR Number/Date: _____ Nonconformance Type (underline): Major <u>Minor</u>
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AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 10.1.1: “Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters.”

Description: No formal statement of commitment has been circulated throughout the organization.

SFI Licensee agreement must be completed before a recommendation for certification can be made by the NSF Lead Auditor.

IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

1) ROOT CAUSE ANALYSIS BY COMPANY—Include potential causes & assurance problem does not exist in other areas.

2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

AUDITOR REVIEW OF COMPANY’S PLAN:

STATUS: _____ AUDITOR/DATE: _____

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

STATUS LEGEND:

OPEN = CA Plan Accepted **CLOSED** = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation rejected

Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Readiness Review, Albany</u> Discussed with: <u>Central Office Staff</u>	Date: <u>April 27, 2007</u> FRS # <u>6L741</u> CAR Number: <u>NYSLM-2007-04</u> Previous CAR Number/Date: _____ Nonconformance Type (underline): Major <u>Minor</u>
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AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 10.1.4: “Contractor education and training sufficient to their roles and responsibilities.”

Description: There are no formal training requirements for loggers.

IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

1) ROOT CAUSE ANALYSIS BY COMPANY—Include potential causes & assurance problem does not exist in other areas.

2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

AUDITOR REVIEW OF COMPANY’S PLAN:

STATUS: _____ AUDITOR/DATE: _____

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

STATUS LEGEND:

rejected **OPEN** = CA Plan Accepted **CLOSED** = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation

Appendix 3

Tentative SFIS Certification Audit Plan

*Sustainable Forestry Initiative® Standard
2005-2009 Edition*



for

**New York DEC
Bureau of State Land Management**

April 30, 2007

**NSF-ISR
789 North Dixboro Road
Ann Arbor, MI 48105
888-NSF-9000
www.nsf-isr.org**

Introduction

- The Bureau of State Land Management (SLM) of the New York DEC Division of Lands and Forests is seeking independent certification that its SFI Program conforms to the requirements of the Sustainable Forestry Initiative® (SFI) Standard, 2005-2009 Edition. An audit team assembled by NSF-ISR will make a determination of conformance according to the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) 2005–2009 Edition. This Audit Plan describes the conduct of the NSF-ISR SFIS Certification Audit conducted to determine conformance.

Additional details about how NSF-ISR’s SFIS Certification Audits are conducted are contained in the NSF-ISR SFIS Certification Process Standard Operating Procedure (4742), which is consistent with the SFI® requirements. Audits for the Sustainable Forestry Initiative Standard® (SFI) are also conducted in accordance with the principles of auditing contained in the International Organization for Standardization (ISO) 19011:2002 guidelines for quality and/or environmental management systems auditing.

SFIS Certification Scope and Objective

The SFIS Certification Audit will apply to the New York SLM’s SFI Program implementation in [State(s), including its timberland management and wood procurement operations], and other related activities that are covered by the SFI Standard.

Forest management for New York State Forests in Regions 3-9, including Reforestation Areas, Multiple Use Areas, and Unique Areas, and related activities in support of sustainable forestry.

As specified in the SFI® Standard 2005-2009, the NSF-ISR SFIS Certification Audit objective is to establish whether the New York SLM’s SFI program is in conformance with the SFIS Objectives, Performance Measures, and Indicators.

The SFIS Performance Measures that are included in and excluded from the scope of the SFIS Certification Audit are outlined in Appendix 1: Readiness Review Summary Sheet which was compiled during the Readiness Review.

Certification Criteria

Determination of conformance to the SFI Standard will be based on the requirements of the 2005-2009 Sustainable Forestry Initiative® Standard. Findings will be based upon the literal language of the SFIS Objectives, Performance Measures and Indicators. The NSF-ISR Audit Team will not add additional requirements that are not specified in the SFI Standard.

The certification indicators to be used are the standard set of SFI requirements and were approved as the criteria to be used to conduct the SFIS Certification Audit in consultation between the New York SLM and the lead auditor during the Readiness Review.

Roles and Responsibilities

The New York SLM’s management representative with respect to this SFIS Certification Audit will be Thomas Wolfe, Forester 4, Division of Lands and Forests supported by David Forness, Principal Forester. Field staff at the selected Regional Offices will participate each day as shown on the itinerary.

In addition, Regional Foresters and their representative from regions not selected for visits will attend reviews of adjacent regions or make themselves available for phone interviews.

The NSF-ISR lead auditor will be Michael Ferrucci. The other members of the audit team are:

- Mr. Sterling Griffin, Forester
- Dr. Dave deCalesta, Wildlife Biologist
- Kathryn Fernholz, Social Scientist

Audit procedures and auditor qualifications shall be consistent with Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) 2005–2009 Edition. Information regarding auditor qualifications is provided in Appendix 3-1.

Confidentiality and Conflict of Interest

All NSF-ISR auditors will maintain complete and strict confidentiality regarding all aspects of the audit. The New York SLM reserves the right to release NSF-ISR and its subcontractors from specific terms of this confidentiality agreement in writing. NSF-ISR will retain at least one copy of the New York SLM's SFIS Indicators and evidence for its records, and audit team members may each retain a copy of the audit report.

All NSF audit team members will sign confidentiality agreements that include provisions regarding the avoidance of conflict of interest, including requirements of the SFI Standard. Prior to finalizing the audit team, the auditor and audit team members shall disclose to New York SLM any prior land appraisal or assessment work or land brokerage activity they or their employers conducted related to the property to be audited.

Readiness Review and Report

A Readiness Review meeting between Bureau of State Land Management staff and the lead auditor was held at the New York SLM's Albany offices on April 25-27. A thorough document review was performed at that time, the lead auditor's credentials were confirmed, and the overall substance of the audit plan was discussed and agreed to. As an outcome of that meeting, the lead auditor determined that the New York SLM is prepared, and necessary documentation is sufficient, to undergo a full SFIS Certification Audit as outlined in this plan.

New York SLM and the lead auditor also reviewed and came to agreement on the specific indicators of conformance that will be used to judge conformance with the SFI Standard. The lead auditor and audit team members will not introduce additional or modified indicators during the field audit. Agreement on the indicators of conformance is necessary to avoid surprises during the SFIS Certification Audit process.

The lead auditor has prepared a Readiness Review Report documenting that the New York SLM is ready to proceed with the SFIS Certification Audit.

Field Sites and Interviewees

The NSF Lead Auditor selected the regions and offices to be visited based on a discussion of the range of field conditions, level of management planning completed, travel time considerations, and locations with respect to previously agreed-upon locations for public stakeholder meetings. Next the auditor used random selection methods to determine that units to be reviewed within each office's management area. Units consist of one or more state forests. The results of this process were:

- May 15, Tuesday – Lowville office: Tug Hill and Westward Waters Units
- May 16, Wednesday – Sherburne Office: Brookfield and Tioughnioga Units
- May 17, Thursday – Cortland office: Virgil Mountain, Split Rock, Cuyler Hill and Rockefeller Units (team will need to split into three groups to cover)
- May 18, Friday – Bath office: Great Divide Unit (visit), Rush Oak Openings (discuss, visit only if time allows)

Selection of actual sites is to be based on maps and a list of all silvicultural treatments and activities since January 1, 2005. The lead auditor and representatives of New York's Bureau of State Land Management reviewed the criteria for selecting field sites and interviewees in order to obtain objective evidence of conformance to the SFI Standard. The specific criteria for selecting these are presented in the following sections.

The New York SLM's representatives are ultimately responsible for compiling field visit sites and interviewee lists that have a greater number of samples than are expected to be examined. Final selection of samples is at the discretion of the audit team.

Potential Field Visit Sites

The NSF-ISR audit team will inspect a variety of field sites to assess conformance with the SFI Standard. During audit planning the Lead Auditor and the Company's representative reviewed the range of field activities and formulated a sampling plan. The Lead Auditor and New York SLM representatives first determined the regional offices to visit. The Lead Auditor then used randomized selection methods to select a subset of all available units within these offices and assigned a priority number to each unit.

Foresters from New York SLM will work with the lead auditor to designate the final selection list from this prioritized list of units. The final selection list will be larger than the number of sites expected to be visited, allowing adjustments during the audit to ensure flexibility and allow for additional samples as needed.

The remaining process for field site selections is contained in Appendix 3-2. When the steps shown in this process are complete the list of field site selections will be inserted into Appendix 3-2.

Potential Audit Interviewees

The NSF-ISR lead auditor has identified the following categories of potential interviewees that may be contacted during the SFIS Certification Audit. New York SLM personnel are requested to develop and organize a list of names and phone numbers so that the audit team may conduct appropriate interviews. This list will be inserted into this plan as Appendix 3-3 as potential interviewees.

- Regulators (EPA, USFWS, State Division of Water, other) ;
- Staff or members of the New York SFI Implementation Committee;
- Trained pesticide applicators (internal and any external)
- Forestry, conservation, or related association staff in New York;

SFIS Certification Audit Schedule

The SFIS Certification Audit will be conducted May 14 to 21 commencing with an opening meeting at 625 Broadway, Albany (5th floor) starting at 8 am. The schedule for the office and field audit to be performed by the NSF-ISR audit team is outlined below.

General Assessment Itinerary – May 14-21, 2007

Task	Sunday 5-13	Monday 5-14	Tuesday, 5-15	Wed., 5-16	Thur. 5-17
Day	Travel to Albany	Opening Meeting Interviews with SLM Staff, DEC specialists, Albany stakeholder meeting 1 to 3 pm	Field Inspection, Lowville Field Office, R6	Field Inspection, Sherburne Field Office, R7	Field Inspection, Corning Field Office, R7
Afternoon/ Evening	Team Meeting (audit team only)	Travel to Utica: Holiday Inn 1777 Burrstone Road New Hartford, NY 13413 315-797-2131	Travel to H.I. Liverpool *, Stakeholder meeting 5-7 pm Syracuse Reg. office (entire team, SLM representative)	Lodging in H.I. Liverpool *; Rochester Public Meeting 1-3 pm Avon Regional office K.F. +one SLM rep.)	Travel to Holiday Inn 304 South Hamilton Street Painted Post, NY 14870 607-962-5021
Accommodations	Ferrucci to has reserved 4 rooms Holiday Inn, Rensselaer	SLM has reserved rooms for Ferrucci, Griffin, deCalesta, Fernholz	SLM has reserved rooms for Ferrucci, Griffin, deCalesta, Fernholz	SLM has reserved rooms for Ferrucci, Griffin, deCalesta	SLM has reserved rooms for Ferrucci, Griffin, deCalesta,

* Holiday Inn, 441 Electronics Parkway, Liverpool, NY 13088, 315-457-1122

Task	Friday, 5-18	Saturday, 5-19	Sunday, 5-20	Monday, 5-21
Day	Field Inspection, Bath Field Office, R8	Synthesis Preliminary and scoring (audit team only w. 1 SLM staff person by phone if possible)	Leads Prepare for Closing (team leaders only,	Closing meeting with SLM 9:30 am – 11 am
Afternoon/ Evening	Drive to Hammondsport	No travel	Leads to Syracuse	Leads fly from Syracuse airport (departure time)
Accommodations	Audit Team at deCalesta's, Hammondsport	Audit Team at deCalesta's, Hammondsport	SLM has reserved rooms in Syracuse for Ferrucci, Griffin	None needed

Field Audit Schedules:

Monday, May 14– Albany office

- 8 am Introductions, Opening Meeting, Review of Agenda
9 am Overview of NY State Forests and their management
- 11 am Topic Discussions
- SEQR – Linda Kashdan-Schrom SG, DD
 - Access – Carole KF
 - Allowable Harvest determination - Dave Forness MF
- Noon-1 Working Lunch – Ferrucci and Forness finalize afternoon sessions
- 1 pm Audit Team Meet with DEC Commissioner and/or his Deputies
- 1-3 pm Stakeholder Meeting (Sterling Griffin, Dr. Fernholz, joined by MF and DD at 4)
- 3-4:30 pm Topic Presentations and Interviews (to be arranged by SLM)
- Tribal Issues – Chuck Vandrei, Agency Preservation Officer, Tribal Liason – KF
 - GIS and Inventory Tools
 - Heritage- Endangered Resources (3:15 pm D.J. - Dr. deCalesta)
 - Outreach; Invasives; Chemical Research (Karin? – K.F., S.G. 4 p.m.)
- 4:30 pm Daily Briefing – Ferrucci, Griffin, Wolfe, Forness
5 pm End of Audit day, Auditors depart for Utica, N.Y.

Tuesday, May 15– Lowville office

- 8 am-9:30 Office: Opening Briefing, Review of Documentation, Finalize Field Sites
10 am – 3 pm Field review (box lunch – to be provided by Regional Office Staff)
3:30 pm Exit Briefing – location to be determined
4 pm End of Audit, Auditors depart for Syracuse public stakeholder meeting
5 to 7 pm Stakeholder meeting, Syracuse

Wednesday May 16 - Sherburne Office

- 8 am-9:30 Office: Opening Briefing, Review of Documentation, Finalize Field Sites
10 am – 4 pm Field review (K.F. stakeholder meeting 1-3 pm Rochester)
Noon Box Lunch – to be provided by Regional Office Staff
4:30 pm Exit Briefing – location to be determined
5 pm End of Audit day, Auditors depart for next location

Thursday, May 17 – Cortland office

- 8 am-9:30 Office: Opening Briefing, Review of Documentation, Finalize Field Sites
10 am – 4 pm Field review
Noon Box Lunch – to be provided by Regional Office Staff
4:30 pm Exit Briefing – location to be determined
5 pm End of Audit day, Auditors depart for next location

Friday, May 18 – Bath office

8 am-9:30 Office: Opening Briefing, Review of Documentation, Finalize Field Sites
 10 am – 4 pm Field review
 Noon Box Lunch – to be provided by Regional Office Staff
 4:30 pm Exit Briefing – location to be determined
 5 pm End of Audit, Auditors depart for Hammondsport for review of evidence/scoring

Audit Team Meeting

The NSF-ISR Audit Team will receive introductory materials in advance of the audit, and may have preliminary e-mail and telephone discussions regarding the assignments and logistics. The audit team will meet at 7 pm Sunday May 13 at the Holiday Inn Express Hotel & Suites (8 Empire Drive, Rensselaer, NY 12144, Phone 518-2861011) to review the audit plan and make any final adjustments.

Daily Briefings

Each day of the SFIS Certification Audit will begin with a brief opening meeting to document the day’s schedule, responsibilities, and arrangements; to obtain any needed documents; and to answer other preliminary questions. Each day will conclude with a short closing meeting to review the day’s findings, to confirm plans for the evening, and to plan for activities the following day.

Potential areas of minor or major non-conformance identified during the field audit will be discussed at the daily closing meeting. Additional evidence or field site investigations that could clarify the areas of non-conformance should be identified and prepared for the following day.

Dispute Resolution Process

The NSF Lead Auditor is responsible for making a recommendation for certification. The NSF Certification Review Board member will review the audit report, consider the Lead Auditor’s recommendation, and make a final determination regarding certification.

In the event that there is a dispute between the lead auditor and the New York SLM over interpretations of the SFI Standard or any other aspect of the certification audit the first step is for the Program Participant’s management representative to call the Audit Manager (888-NSF-9000) to resolve the dispute. If the dispute continues, the formal dispute resolution process of NSF-ISR (AE-989-0002) will be followed.

Reporting

April 27, 2007	I. a) pre-certification meeting
May 14-21 2007	I.d) field assessment and stakeholder meetings #1, #2 & #3 (during audit)
June 29, 2007	I.e) draft reports provided to Bureau of State Land Management
July 27, 2007	NY Bureau of State Land Management comments returned
September 7*, 2007	I.f) Delivery of final report and award of certification (if warranted)

* or within 60 days of receipt of SLM’s comments on the draft report

Process for Preparation and Review of the Final Report

The lead auditor will prepare a draft report consistent with the format and contents outlined in the NSF-ISR SFIS Certification Process document. The lead auditor shall forward the draft final report to the New York SLM for a review of factual accuracy within two weeks of the Closing Meeting. The New York SLM will have up to two weeks to submit comments to the lead auditor. The lead auditor will incorporate appropriate suggestions from the New York SLM and then forward the Final Report to the NSF-ISR CB reviewer within one week of receipt of comments.

The CB reviewer will review the Final Report for thoroughness and completeness and shall make the final decision regarding certification. Upon approval, the SFI Program Manager will send the Final Report to NSF and will ensure that a copy and certificate are issued to the New York SLM within eight weeks of the closing meeting. If additional time is required the SFI Program Manager and/or the Lead Auditor will so notify the Company.

Public Report

A public report must be provided to SFI Inc. for posting on their web site. This public report must be provided to SFI Inc. at least two weeks in advance of any public claims or statements about the results of the SFIS Certification Audit.

The content of the public report will be agreed to by NSF-ISR and the New York SLM to ensure that it captures all of the relevant findings. This public report will normally consist of the first section of the SFI Audit Report and shall include the following:

- Description of the audit process, objectives, and scope;
- Description of substitute indicators, if any, used in the audit and a rationale for each;
- Name of Program Participant that was audited, including its SFI representative;
- General description of the Program Participant's forestland and manufacturing operations included in the audit;
- Name of the audit firm and lead auditor (names of the audit team members, including technical experts may be included at the discretion of the audit team and Program Participant);
- Dates the certification was conducted and completed;
- Summary of the findings, including general descriptions of any nonconformances and corrective action plans to address them, opportunities for improvement, and exceptional practices; and
- Certification recommendation..

Final Report

In addition to the core elements of the Public Report described above, the Final Certification Report shall include the following:

- The Audit Plan including audit team personnel;
- Notification letter, including the audit dates; and
- The Audit Matrix and Notes pages.

Distribution of Reports

The final and summary reports are the sole property of the New York SLM. The distribution of the final and summary reports will be at the discretion of the New York SLM. Consistent with the requirements of the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) 2005–2009 Edition, the New York SLM should submit a copy of the summary report to SFI Inc.

All working documents, draft and final and summary reports in the possession of the audit team members and lead auditor shall be destroyed at the end of the SFIS Certification Audit process, unless agreed to in writing by NSF-ISR and the New York SLM. NSF-ISR and the lead auditor shall retain one copy of all documents related to the SFIS Certification in permanent files for purposes of conducting surveillance audits and re-audits, and for other legitimate purposes.

Certificate of Conformance

Upon successful completion of the SFIS Certification Audit process as contained in this Audit Plan, NSF-ISR shall issue a formal certificate of conformance with the SFI Standard. The content of the SFIS Certificate is outlined in the NSF-ISR SFIS Certification Process Standard Operating Procedure.

Surveillance Audit and Re-audit Schedule

The final step in the audit planning process is to tentatively schedule periodic surveillance audits. The periodic surveillance audits will generally be scheduled within twelve months of the initial audit, and will generally occur annually.

Appendices

Appendix 3-1	Qualifications of Auditors
Appendix 3-2	Potential Field Sites
Appendix 3-3	Potential Interviewees

Appendix 3-1



Qualifications of Auditors

Mr. Michael Ferrucci, Forester:

Mike Ferrucci is the SFI Program Manager for NSF – International Strategic Registrations and is responsible for all aspects of the firm’s SFI Certification programs. He is qualified as a RAB-QSA Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor, as an FSC Team Leader, and as a Tree Farm Group Certification Lead Auditor. Mike has led Sustainable Forest Initiative (SFI) certification and precertification reviews throughout the United States. He has also led or participated in joint SFI and Forest Stewardship Council (FSC) certification projects in Minnesota, Wisconsin, Michigan, Maryland, Maine, and Connecticut and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He also co-led the pioneering pilot dual evaluation of the Lakeview Stewardship Unit on the Fremont-Winema National Forests. He is qualified as a RAB EMS Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor, as an FSC Team Leader, and as a Tree Farm Group Certification Lead Auditor.

Mike has 27 years of forest management experience. His expertise is in sustainable forest management planning; in certification of forests as sustainably managed, in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis on regeneration and management of native hardwood species. He has also developed expertise in the conservation of forest biodiversity at multiple spatial scales through his involvement in the founding and administration of The Conservation Forestry Network and through his work with the Northern Forest Protection Fund.

Mike has conducted or participated in assessments of forest management operations throughout the United States, with field experience in Maine, New Hampshire, New York, Massachusetts, Connecticut, Rhode Island, New Jersey, Pennsylvania, Maryland, West Virginia, Kentucky, Tennessee, Florida, Georgia, Alabama, Mississippi, Oklahoma, Indiana, Minnesota, Michigan, Wisconsin, Arizona, California, Oregon, and Washington. Mike is a 28-year member of the Society of American Foresters and is active in the Association of Consulting Foresters and the Connecticut, Massachusetts, and Rhode Island State Implementation Committee (SIC) for the Sustainable Forestry Initiative.

Mr. Sterling Griffin, Forester:

Sterling Griffin is a Certification Forester with Scientific Certification Systems (SCS). He is a Registered Professional Forester in the State of California with professional experience in private and public land management. He is a graduate of Purdue University with a B.S in Forestry and has administered Forest Stewardship Council (FSC) endorsed assessments on over 4 million acres of forestland throughout the United States. As a forest certification practitioner, he has conducted certification assessments on public lands including Michigan DNR, Indiana Division of Forestry, and private operations in Oregon, Washington, and California. Prior to joining SCS, he was the founder of a private consulting firm in Northern California specializing in sustained yield management, fuel reduction, and forest health management. His professional career also includes conducting silvicultural and ecosystem research for the U.S. Forest Service. Areas of research activities included stand level

response to vegetative competition and Long-Term Ecosystem Productivity (LTEP) in the Pacific Northwest.

Dr. Dave deCalesta, Wildlife Biologist:

Dave deCalesta is a certified Wildlife Biologist, M.S., Ph.D. in Wildlife Ecology Colorado State University, B.S. Psychology, Dartmouth College. He is currently Adjunct Professor of Forestry at SUNY College of Environmental Science and Forestry-Syracuse, and a wildlife consultant (Wildlife Analysis PC). He has prior experience as a research wildlife biologist with the Forest Service's Northeastern Forest Experiment Station (1988-2001), and professor and extension wildlife specialist in forest science and wildlife ecology at North Carolina State University and Oregon State University (1973-1988). He has participated in over 10 FSC forest certification assessments/scopings as an ecologist, and been team leader for 3 assessments. Dr. deCalesta served as an assessor on previous FSC audits of New York SLM, and as a result is very familiar with the operation.

Kathryn Fernholz, Social Scientist:

Kathryn has worked on development and forest management issues in a range of roles. She currently is Executive Director of Dovetail Partners, Inc. Starting in 2004 Kathryn served as Forestry Program Director for Dovetail. With a consulting firm, Kathryn was a member of the environmental department and assisted with natural resource inventories, reporting, and environmental impact assessments including the use of Geographic Information Systems (GIS). While working with the Community Forestry Resource Center, Kathryn managed a group certification project for family forests and worked to increase local capacity to provide forest management and marketing services that are compatible with certification standards.

Kathryn has been a leader within the forestry community in the Upper Midwest through her service as Chair of the Minnesota Chapter of the Society of American Foresters and her appointment to the Minnesota Forest Resources Council. Kathryn has a B.S. in Forest Resources from the University of Minnesota, College of Natural Resources and also studied at the College of Saint Benedict in St. Joseph, MN and Sheldon Jackson College in Sitka, Alaska.

Appendix 3-2



Potential Field Visit Sites

New York State DEC Field Audit, May 14-18, 2007

Unit Selections:

- Lowville office: Tug Hill and Westward Waters Units
- Wednesday – Sherburne Office: Brookfield and Tioughnioga Units
- Thursday – Cortland office: Virgil Mountain, Split Rock, Cuyler Hill and Rockefeller Units (team will need to split into three groups to cover)
- Friday – Bath office: Great Divide Unit (visit), Rush Oak Openings (discuss)

Broad List of Activities on State Forests since July 11, 2005

Active timber sales

Revenue Sales (1)

Local Sales (2)

Completed harvests

Revenue Sales (3)

Local Sales (4)

Non-Commercial forest stand improvement / TSI (5)

Tree planting (6)

Habitat management (7)

Recreation trail development or rehabilitation (8)

Infrastructure development or improvement (9)

Accessibility projects (10)

TRP activity (land-use permits) (11)

AANR activities (volunteers) (12)

UMP Planning efforts

UMP preparation (13)

UMP amendments (14)

UMP implementation (15)

Step One:

For items 1,2,3,4,5,6,7,8 on the above list, and within the units selected, please provide lists of these activities dating from Jan. 1, 2005 to the present. Please use MS Word or Excel if possible, with one activity per line if possible. Send these lists to Dave Forness by May 4, who will compile and send to Mike Ferrucci by May 8.

Step Two:

Ferrucci will provide a short list of selected sales (Items 1 and 3) for review. If there are not enough revenue sales then he will select some from Items 2 and 4 (local sales) as well. There will be 8 to 10 sales on this list; the auditors will narrow the selections on the day of the audit.

Step Three:

For these selected sales (the 8 to 10 selected by Ferrucci) please be prepared to carry your complete files into the field. In addition prepare the following information for the field audit (for the day of the audit)

- Site map*
- * 1-10 pages of descriptive material from your files – don't create something for this audit, just copy what you have that best describes the project

(* **three sets please** plus any needed for Bureau of State Land Management Albany)

General Information - **One Set to be shared by the auditors**

- Information on selected sites as described in Step Four below (non-timber harvest sites)
- Unit Management Plan (printed – one copy)

Step Four:

Prepare travel routes and maps showing the selected sales (Items 1 and 3) and locations of adjacent sites from the remainder of the list. Try to include most or all of the listed categories, provided they exist within the selected units or nearby. If you skip any category please be prepared to explain why – distance or access are certainly acceptable reasons.

Lowville: the team will select 4 to 5 harvest sites; you will have time to also show us up to 5 additional stops, some of which should have multiple items of interest. If we can see multiple items without loading into vehicles we can see more.

Sherburne: the team will select 4 to 6 harvest sites; you will have time to also show us up to 8 additional stops because the team will split into smaller groups. If we can see multiple items without loading into vehicles we can see more. Be prepared to have the auditors in two groups.

Cortland: the team will select 4 to 6 harvest sites; you will have time to also show us up to 8 additional stops, some of which should have multiple items of interest, because the team will split into smaller groups. If we can see multiple items without loading into vehicles we can see more. Be prepared to have the auditors in two groups.

Bath: the team will select 3 to 4 harvest sites. Because the team can split into smaller groups you will have time to also show us up to 6 additional stops, some of which should have multiple items of interest. If we can see multiple items without loading into vehicles we can see more.

Important:

We know you are busy. If we are asking for anything that takes too much time consider alternative approaches and contact Dave Forness.

Prepared by Mike Ferrucci, NSF Lead Auditor

Office & Mobile: 203-887-9248 mferrucci@iforest.com

Appendix 3-3



Potential Audit Interviewees

- Regulators (EPA, USFWS, State Division of Water, other) ;
- Staff or members of the New York SFI Implementation Committee;
- Trained pesticide applicators (internal and any external)
- Forestry, conservation, or related association staff in New York;



Section B
SFI Certification Audit Matrix
(Note: version from readiness review)

NY Bureau of State Land Management Audit Matrix

- NA in the Auditor column indicates that the associated Performance Measure or Indicator does not apply; otherwise the Auditor column is optional.
- Findings codes: C=Conformance; EXR=Exceeds the SFI requirement; Maj= Major Non-conformance; Min=Minor Non-conformance; OFI= Opportunity for Improvement (OFI may be combined with other findings)
- Findings are indicated by a date or date code: Audit Date - May, 2007 Date Code - 7

Objective 1: To broaden the implementation of sustainable forestry by ensuring long-term harvest levels based on the use of the best scientific information available.

Performance Measure/ Indicator		Audit- or	- - - Indicate Only One - - -				OFI
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
1.1	<i>Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth and-yield models and written plans.</i>	MF	7				
1.1.1	A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including: a. a periodic or ongoing forest inventory; b. a land classification system; c. soils inventory and maps, where available; d. access to growth-and-yield modeling capabilities; e. up-to-date maps or a geographic information system (GIS); f. recommended sustainable harvest levels; and g. a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).					7 Minor 2007- 01	
1.1.2	Documentation of annual harvest trends in relation to the sustainable forest management plan.		7				
1.1.3	A forest inventory system and a method to calculate growth.		7				
1.1.4	Periodic updates of inventory and recalculation of planned harvests.		7				
1.1.5	Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans.		7				

Objective 2: To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation and other measures.

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
2.1	<i>Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within five years.</i>	MF, SG	7				
2.1.1	Designation of all management units for either natural or artificial regeneration.		7				
2.1.2	Clear Requirements to judge adequate regeneration and appropriate actions to correct under-stocked areas and achieve desired species composition and stocking rates for both artificial and natural regeneration		7				
2.1.3	Minimized plantings of exotic tree species and research documentation that exotic tree species, planted operationally, pose minimal risk.	MF	7				
2.1.4	Protection of desirable or planned advanced natural regeneration during harvest.		7				
2.1.5	Artificial reforestation programs that consider potential ecological impacts of a different species or species mix from that which was harvested.		7				
2.2	<i>Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the forest environment.</i>	MF, SG	7				
2.2.1	Minimized chemical use required to achieve management objectives.		7				
2.2.2	Use of least toxic and narrowest spectrum pesticide narrowest spectrum and least toxic pesticides necessary to achieve management objective.		7				
2.2.3	Use of pesticides registered for the intended use and applied in accordance with the label requirements.		7				
2.2.4	Use of Integrated Pest Management where feasible.		7				
2.2.5	Supervision of forest chemical applications by state-trained or certified applicators.		7				

NY Bureau of State Land Management Audit Matrix

Performance Measure/ Indicator		<u>Audit -or</u>	- - - Indicate Only One - - -				<u>OFI</u>
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
2.2.6	Use of best management practices appropriate to the situation; for example: adjoining landowners or nearby residents notified of applications and chemicals used; appropriate multi-lingual signs or oral warnings used; public road access controlled during and after applications; streamside and other needed buffer strips appropriately designated; positive shut-off and minimal drift spray valves used; drift minimized by aerially applying forest chemicals parallel to buffer zones; water quality monitored or other methods used to assure proper equipment use and stream protection of streams, lakes and other waterbodies; chemicals stored at appropriate locations; state reports filed as required; or methods used to ensure protection of federally listed threatened & endangered species.		7				
2.3	<i>Program Participants shall implement management practices to protect and maintain forest and soil productivity.</i>	MF	7				
2.3.1	Use of soils maps where available.		7				
2.3.2	Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.					7 Minor 2007- 05	
2.3.3	Use of erosion control measures to minimize the loss of soil and site productivity.		7				
2.3.4	Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails).					7 Minor 2007- 05	
2.3.5	Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area.		7				
2.3.6	Criteria that address harvesting and site preparation to protect soil productivity.					7 Minor 2007- 05	
2.3.7	Minimized road construction to meet management objectives efficiently.		7				
2.4	<i>Program Participants shall manage so as to protect forests from damaging agents such as environmentally or economically undesirable wildfire, pests and diseases to maintain and improve long-term forest health, productivity and economic viability.</i>	MF, DD, SG	7				
2.4.1	Program to protect forests from damaging agents.		7				
2.4.2	Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.					7 Minor 2007- 07	
2.4.3	Participation in, and support of, fire and pest prevention and control programs.	MF	7				

NY Bureau of State Land Management Audit Matrix

Performance Measure/ Indicator		<u>Audit</u> <u>-or</u>	- - - Indicate Only One - - -				<u>OFI</u>
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
2.5	<i>Program Participants that utilize genetically improved planting stock including those derived through biotechnology shall use sound scientific methods and follow all applicable laws and other internationally applicable protocols.</i>	MF	7				
2.5.1	Program for appropriate research, testing, evaluation and deployment of genetically improved planting stock including trees derived through biotechnology.		7				

Objective 3: To protect water quality in streams, lakes and other water bodies.

Performance Measure/ Indicator		<u>Audit</u> <u>-or</u>	- - - Indicate Only One - - -				<u>OFI</u>
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
3.1	<i>Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality laws and meet or exceed Best Management Practices developed under Environmental Protection Agency (EPA)-approved state water quality programs other applicable federal, provincial, state or local programs.</i>	MF,	7				
3.1.1	Program to implement state or provincial equivalent BMPs during all phases of management activities.					7 Minor 2007- 06	
3.1.2	Contract provisions that specify BMP compliance.		7				
3.1.3	Plans that address wet weather events (e.g., inventory systems, wet weather tracts, defining acceptable operational conditions, etc.).		7				7
3.1.4	Monitoring of overall BMP implementation.					7 Minor 2007- 06	
3.2	<i>Program Participant shall have or develop, implement, and document, riparian protection measures based on soil type, terrain, vegetation and other applicable factors.</i>	MF, SG, DD	7				
3.2.1	Program addressing management and protection of streams, lakes and other water bodies and riparian zones.		7				
3.2.2	Mapping of streams, lakes and other water bodies and riparian zones, and where appropriate, identification on the ground.		7				
3.2.3	Implementation of plans to manage or protect streams, lakes and other water bodies.		7				
3.2.4	Identification and protection of nonforested wetlands, including bogs, fens, vernal pools and marshes of significant size.		7				
3.2.5	Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.	N.A.					

Objective 4: Manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape- level measures that promote habitat diversity and the conservation of forest plants and animals including aquatic fauna.

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
4.1	<i>Program participants shall have programs to promote biological diversity at stand- and landscape- scales.</i>	DD, MF, SG	7				
4.1.1	Program to promote the conservation of native biological diversity, including species, wildlife habitats, and ecological or natural community types, at stand and landscape levels.		7				
4.1.2	Program to protect threatened and endangered species.		7				
4.1.3	Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies		7				7
4.1.4	Development and implementation of criteria, as guided by regionally appropriate science, for retention of stand-level wildlife habitat elements (e.g., snags, mast trees, down woody debris, den trees, nest trees).		7				
4.1.5	Assessment, conducted individually or collaboratively, of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities, where practical and when consistent with management objectives.		7				7
4.1.6	Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership.			7			
4.1.7	Participation in programs and demonstration of activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plant and animal communities.			7			
4.1.8	Program to incorporate the role of prescribed or natural fire where appropriate.		7				
4.2	<i>Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.</i>	DD, SG, MF		7			
4.2.1	Collection of information on critically imperiled and imperiled species and communities and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.			7			

NY Bureau of State Land Management Audit Matrix

Performance Measure/ Indicator	<u>Audit</u> <u>-or</u>	- - - Indicate Only One - - -				<u>O</u> <u>F</u> <u>I</u>
		<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
4.2.2 A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.			7			

Objective 5: To manage the visual impact of harvesting and other forest operations.

Performance Measure/ Indicator	<u>Audit</u> <u>-or</u>	- - - Indicate Only One - - -				<u>O</u> <u>F</u> <u>I</u>
		<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
5.1 <i>Program Participants shall manage the impact of harvesting on visual quality.</i>	MF		7			
5.1.1 Program to address visual quality management.			7			
5.1.2 Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.			7			
5.2 <i>Program Participants shall manage the size, shape, and placement of clearcut harvests.</i>	MF	7				
5.2.1 Average size of clearcut harvest areas does not exceed 120 acres, except when necessary to respond to forest health emergencies or other natural catastrophes.		7				
5.2.2 Documentation through internal records of clearcut size and the process for calculating average size.		7				
5.3 <i>Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.</i>		7				
5.3.1 Program implementing the green-up requirement or alternative methods.		7				
5.3.2 Harvest area tracking system to demonstrate compliance with the green-up requirement or alternative methods.		7				
5.3.3 Trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Program Participant.		7				

Objective 6: To manage Program Participant lands that are ecologically, geologically, historically, or culturally important in a manner that recognizes their special qualities.

Performance Measure/ Indicator	<u>Audit</u> <u>-or</u>	- - - Indicate Only One - - -				<u>O</u> <u>F</u> <u>I</u>
		<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
6.1. <i>Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.</i>	DD, SG	7				

NY Bureau of State Land Management Audit Matrix

Performance Measure/ Indicator		<u>Audit -or</u>	- - - Indicate Only One - - -				<u>OFI</u>
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
6.1.1	Use of existing natural heritage data and expert advice in identifying or selecting sites for protection because of their ecologically, geologically, historically, or culturally important qualities.	SG	7				
6.1.2	Appropriate mapping, cataloging, and management of identified special sites.	SG		7			

Objective 7: To promote the efficient use of forest resources.

Performance Measure/ Indicator		<u>Audit -or</u>	- - - Indicate Only One - - -				<u>OFI</u>
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
7.1	<i>Program Participants shall employ appropriate forest harvesting technology and “in-woods” manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives.</i>	MF	7				
7.1.1	Program or monitoring system to ensure efficient utilization, which may include provisions to ensure a. landings left clean with little waste; b. residues distributed to add organic and nutrient value to future forests; c. training or incentives to encourage loggers to enhance utilization; d. cooperation with mill managers for better utilization of species and low-grade material; e. merchandizing of harvested material to ensure use for its most beneficial purpose; f. development of markets for underutilized species and low-grade wood; g. periodic inspections and reports noting utilization and product separation; or h. exploration of alternative markets (e.g., energy markets).		7				

Objective 8: N.A. To broaden the practice of sustainable forestry through procurement programs.

Objective 9: To improve forestry research, science, and technology, upon which sound forest management decisions are based.

Performance Measure/ Indicator		<u>Audit</u> <u>-or</u>	- - - Indicate Only One - - -				<u>OFI</u>
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
9.1	<i>Program Participants shall individually, through cooperative efforts, or through associations provide in-kind support or funding, in addition to that generated through taxes, for forest research to improve the health, productivity, and management of forest resources.</i>	MF	7				
9.1.1	Current financial or in-kind support of research to address questions of relevance in the region of operations. The research will include some or all of the following issues: a. forest health, productivity, and ecosystem functions; b. chemical efficiency, use rate, and integrated pest management; c. water quality; d. wildlife management at stand or landscape levels; e. conservation of biological diversity; and f. effectiveness of BMPs.		7				
9.2	<i>Program Participants shall individually, through cooperative efforts, or through associations develop or use state, provincial, or regional analyses in support of their sustainable forestry programs.</i>	MF	7				
9.2.1	Participation, individually or through cooperative efforts or associations at the state, provincial, or regional level, in the development or use of a. regeneration assessments; b. growth-and-drain assessments; c. BMP implementation and compliance; and d. biodiversity conservation information for family forest owners.		7				

Objective 10: To improve the practice of sustainable forest management by resource professionals, logging professionals, and contractors through appropriate training and education programs.

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
10.1	<i>Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI Standard.</i>	MF			7		
10.1.1	Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters.	MF			7 Major 2007- 02		
10.1.2	Assignment and understanding of roles and responsibilities for achieving SFI Standard objectives.	MF			7 Major 2007- 03		
10.1.3	Staff education and training sufficient to their roles and responsibilities.	All				7 Minor 2007- 08	
10.1.4	Contractor education and training sufficient to their roles and responsibilities.					7 Minor 2007- 04	
10.2	<i>Program Participants shall work closely with state logging or forestry associations, or appropriate agencies or others in the forestry community, to foster improvement in the professionalism of wood producers.</i>	MF	7				
10.2.1	Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers' training courses that address a. awareness of sustainable forestry principles and the SFI Program; b. BMPs, including streamside management and road construction, maintenance, & retirement; c. regeneration, forest resource conservation, and aesthetics; d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat; e. logging safety; f. U.S. Occupational Safety and Health Administration regulations, wage and hour rules, and other employment laws; g. transportation issues; h. business management; and i. public policy and outreach.	MF	7				

Objective 11: Commitment to comply with applicable federal, provincial, state, or local laws and regulations.

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
11.1	<i>Program Participants shall take appropriate steps to comply with applicable federal, provincial, state, and local forestry and related environmental laws and regulations.</i>	MF, KF	7				
11.1.1	Access to relevant laws and regulations in appropriate locations.	MF, KF	7				
11.1.2	System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.	MF, KF	7				
11.1.3	Demonstration of commitment to legal compliance through available regulatory action information.	MF, KF	7				
11.1.4	Adherence to all applicable federal, state, & provincial regulations and international protocols for research & deployment of trees derived from improved planting stock & biotechnology.	N.A.					
11.2	<i>Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the Program Participant operates.</i>	MF, KF	7				
11.2.1	Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, antidiscrimination and anti-harassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.	MF, KF	7				

Objective 12: To broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment to sustainable forestry and publicly report progress.

Performance Measure/ Indicator		<u>Audit</u> <u>-or</u>	- - - Indicate Only One - - -				<u>O</u> <u>F</u> <u>I</u>
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
12.1	<i>Program Participants shall support and promote efforts by consulting foresters, state and federal agencies, state or local groups, professional societies, and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.</i>	MF	7				
12.1.1	Support for efforts of SFI Implementation Committees.	MF	7				
12.1.2	Support for the development and distribution of educational materials, including information packets for use with forest landowners.	MF	7				
12.1.3	Support for the development and distribution of regional or statewide information materials that provide landowners with practical approaches for addressing biological diversity issues, such as specific wildlife habitat, critically imperiled or imperiled species, and threatened and endangered species.	MF	7				
12.1.4	Participation in efforts to support or promote conservation of working forests through voluntary market-based incentive programs (e.g., current-use taxation programs, Forest Legacy, or conservation easements).	MF		7			
12.1.5	Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders. Consider the results of these efforts in planning where practical and consistent with management objectives.	MF	7				
12.2	<i>Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to forest management.</i>	MF	7				
12.2.1	Support for the SFI Implementation Committee program to address outreach, education, and technical assistance (e.g., toll-free numbers, public sector technical assistance programs).	MF	7				
12.2.2	Periodic educational opportunities promoting sustainable forestry, such as a. field tours, seminars, or workshops; b. educational trips; c. self-guided forest management trails; or d. publication of articles, educational pamphlets, or newsletters; or e. support for state, provincial, and local forestry organizations and soil and water conservation districts.	MF	7				
12.2.3	Recreation opportunities for the public, where consistent with forest management objectives.	MF		7			

NY Bureau of State Land Management Audit Matrix

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
12.3	Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.	MF, MS	7				
12.3.1	Involvement in public land planning and management activities with appropriate governmental entities and the public.	MF, MS	7				
12.3.2	Appropriate contact with local stakeholders over forest management issues through state, provincial, federal, or independent collaboration.	MF, MS	7				
12.4	Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples.	MF, MS	7				
12.4.1	Program that includes communicating with affected indigenous peoples to enable Program Participants to a. understand and respect traditional forest related knowledge; b. identify and protect spiritually, historically, or culturally important sites; and c. address the sustainable use of nontimber forest products of value to indigenous peoples in areas where Program Participants have management responsibilities on public lands.	MF, MS	7				
12.5	Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.	MF	7				
12.5.1	Support for SFI Implementation Committee efforts (toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.	MF	7				
12.5.2	Process to receive and respond to public inquiries.	MF	7				
12.6	Program Participants shall report annually to the SFI Program on their compliance with the SFI Standard.	MF					
12.6.1*	Prompt response to the SFI annual progress report. (*Note: This indicator will be reviewed in all audits.)	N.A.					
12.6.2	Recordkeeping for all the categories of information needed for SFI annual progress reports.	MF					
12.6.3	Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI Standard	N.A.					

NY Bureau of State Land Management Audit Matrix

Objective 13: To promote continual improvement in the practice of sustainable forestry and monitor, measure, and report performance in achieving the commitment to sustainable forestry.

Performance Measure/ Indicator		<u>Audit</u> <u>-or</u>	- - - Indicate Only One - - -				<u>OFI</u>
			<u>C</u>	<u>EXR</u>	<u>Maj</u>	<u>Min</u>	
<i>13.1*</i>	<i>Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in programs, and to inform their employees of changes. (*This Performance Measure will be reviewed in all audits.)</i>	MF			7		
13.1.1	System to review commitments, programs, and procedures to evaluate effectiveness.	MF	7				
13.1.2	System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures.	MF	7				
13.1.3	Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.	MF			7 Major 2007- 03	7 Minor 2007- 07	

Auditor Notes

Requirement	Finding	Notes
1.1		<i>“Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth and-yield models and written plans.”</i>
1.1.1	Minor	<p>“A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including: a. periodic or ongoing forest inventory; b. a land classification system; c. soils inventory and maps, where available; d. access to growth-and-yield modeling capabilities; e. up-to-date maps or a geographic information system (GIS); f. recommended sustainable harvest levels; and g. a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).”</p> <p><u>Minor Non-conformance NYSLM-2007-01:</u> <u>Although most of the required issues are covered by other types of analysis, Unit Management Plans (UMPs) are not complete and there is not a clear schedule with resources identified to complete these plans in a timely manner. These plans are being used to update the allowable harvest levels consistent with the current ecosystem management approach. Considering areas lacking UMPs, evidence was not presented that the 1991 Annual Allowable Cut determination is still reliable.</u></p> <ul style="list-style-type: none"> • Unit Management Plans (UMPs) are complete and officially approved for 41 of 139 units. Plans are in progress for many other units; some of these plans are sufficiently complete that they are being used to guide management (recreation management issues often delay final approval, but vegetation management portions are generally not significantly altered during review phases in most of these cases). • A review of the complete compendium of guidance, policy, procedure, analysis, and management control for the entire state forest system by the audit team concluded that even for areas currently lacking approved or nearly completed UMPs the elements of a broad management plan consistent with SFI requirement are in place. These components are widely scattered and varied in terms of being up-to-date or even applicable. • Completed UMPs, particularly those completed in the past six years, are exemplary and consistent with current goals, conditions, and scientific/ecological knowledge. • Land classification includes broad land categories (including Reforestation Areas, Multiple Use Areas, and Unique Areas) and Site Index for all stands • a. Inventory (see below) • Confirmed items b., c., e.: SLM has developed a superb GIS systems including extensive data layers for the NY State Forests as well as surrounding lands. The GIS group regularly adds features and capabilities, most recently SF Special Management Zones and an “Invasive Plant Model” • d. Growth and Yield capabilities are weak, but acceptable given that harvest levels are set by area control (f. below). There is an opportunity to improve the methods for estimating growth. • f. Allowable harvest levels based on the 1991 methodology (see are not being met. • g. Review of non-timber issues is excellent, including the New York State Wildlife Assessment, the GEIS covering most categories of timber sales, site-specific SEQA Reviews for 4 categories of activities (chemical use, prescribed fire, clear cuts over 40 acres, and ground-disturbing construction). SEQA review done by an on-staff specialist in historic and archeological issues. The process for developing Unit Management Plans is covered by SEQA.
1.1.2	C	“Documentation of annual harvest trends in relation to the sustainable forest management plan.”

		<ul style="list-style-type: none"> • Provided. Harvests are significantly below allowable harvest levels, due to staffing levels and constantly increasing recreational use • 1982-1995 harvest levels were 16k to 20k acres per year • In 1991 set an Allowable Harvest Acres: 17,675 acres per year; • since 2000 about 10,000 acres per year have been treated
1.1.3	OFI	<p>“A forest inventory system and a method to calculate growth.”</p> <p><u>There is an opportunity to improve the methods for estimating growth.</u></p> <ul style="list-style-type: none"> • Confirmed that inventories are generally completed every 15 years or so, with some exceptions. A transition is currently underway to a modern and efficient inventory system using field data recorders linked to the GIS. • Growth estimation capabilities are weak, but acceptable given that harvest levels are set by area control. • A new inventory program is being implemented that will significantly improve the speed, quality, and comprehensiveness of forest inventory;
1.1.4	C	<p>“Periodic updates of inventory and recalculation of planned harvests.”</p> <p><u>See Minor Non-conformance NYSLM-2007-01 associated with SFI Indicator 1.1.1 regarding updating the allowable cut calculation as part of the Unit Management Planning process.</u></p> <ul style="list-style-type: none"> • Confirmed that inventories are generally completed every 10-15 years, with some exceptions which are managed so as not to compromise the core purposes of inventory. • In 1991 - 92 an allowable cut for State Forests was developed using an area control method. Reviewed this method and found it to be reasonable but somewhat outdated based on the transition to ecosystem management. • Silvicultural prescriptions are made based on silvicultural analysis; these are done immediately prior to making harvest decisions. • Under area control allowable harvest levels would not change based on inventory results; harvest levels in this system change following major storm events, with spikes in harvest levels having occurred about ten years ago. Harvest levels soon returned to planned levels and lower.
1.1.5	C	<p>“Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans.”</p> <ul style="list-style-type: none"> • Harvest levels by volume, revenue received, and acres treated were provided. The calculated allowable harvest acreage of 17,600 acres per year is not being met due to understaffing and the assignment of foresters to other duties, including the preparation of management plans on state forests and preserves, work related to a notable land acquisition program / easement program, and time devoted to managing significant increases in recreation demand which includes many conflicts between user groups and/or concerns regarding short-term impacts of timber management on recreation and esthetics. See Minor Non-conformance under SFI Indicator 2.4.2. • Source: Office of the New York State Comptroller, Division of State Services, State Forest Timber Sales, Report 2006-S-9 “The Bureau has determined the optimal amount of sustainable harvesting that can be done in State forests each year. However, we found the Bureau is harvesting only about half that amount. As a result, important forest management goals are not being fully achieved. We also estimate that about \$4.85 million a year in potential timber sale revenue has been lost.” • There is no allowable cut effect in this system; anticipated growth responses from silvicultural treatments do not drive harvest levels. Under area control the critical assumption is that treated stands will respond in ways predicted (thinned stands will be available for another thinning within 15 to 20 years, for example). The SLM area-control methodology was reviewed and found to be sound and quite conservative; staff levels have prevented area treatment targets from being attained, but most re-entry assumptions still valid.

2.1	C	<i>“Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within five years.”</i>
2.1.1	C	<p>“Designation of all management units for either natural or artificial regeneration.”</p> <ul style="list-style-type: none"> • Harvest proposals are developed by trained professional foresters. When harvests are set up a silvicultural analysis is prepared that describes the regeneration method if the treatment includes regeneration goals. For intermediate treatments the ultimate regeneration method is known. Very little planting is done (less than 1% of acres treated each year).
2.1.2	C	<p>“Clear Requirements to judge adequate regeneration and appropriate actions to correct understocked areas and achieve desired species composition and stocking rates for both artificial and natural regeneration.”</p> <ul style="list-style-type: none"> • Confirmed by field observations that regeneration treatments are generally quite successful, with dense young stands arising following most shelterwood or clearcut treatments observed.
2.1.3	C	<p>“Minimized plantings of exotic tree species and research documentation that exotic tree species, planted operationally, pose minimal risk.”</p> <ul style="list-style-type: none"> • Norway spruce is planted, but in small areas; planting data showed that Norway spruce planting totaled 184 acres since 1-1-05, less than 1% of acres treated. • A 1-page memo “Planting of Non-Native Conifers on State Forests” provides the rationale for use of European Larch, Japanese Larch and Norway spruce on New York State Forests, which is based on long experience and sustainable forestry practices. Experience over 100+ years, some published research, and the fact that these species are not found on any list of exotic invasive species are conclusive
2.1.4	C	<p>“Protection of desirable or planned advanced natural regeneration during harvest.”</p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited.
2.1.5	C	<p>“Artificial reforestation programs that consider potential ecological impacts of a different species or species mix from that which was harvested.”</p> <ul style="list-style-type: none"> • Not done – Norway is planted only to replace existing Norway spruce • Bureau of State Land Management is implementing a program to replace most planted stands with native hardwood species. The majority of the plantations were started before 1945 when soil requirements were not well known; many failed, and those that survived have succeeded by improving soil conditions and allowing the development of a hardwood understory. Natural regeneration methods are being used to convert most plantations to desirable hardwoods. Challenges exist, but overall the program exceeds the standard by moving significant acres away from exotic species and back to native hardwoods.
2.2	C	<i>“Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the forest environment.”</i>
2.2.1	C	<p>“Minimized chemical use required to achieve management objectives.”</p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited that chemical application rates are modest and that treatments are confined to those sites lacking alternatives. Most applications involve back-pack mist blowing to control understory beech and/or ferns • Chemicals are not a routine part of regeneration methods; they are used for invasive control and for site preparation in some but not all plantings; planting is done for less than 1% of the acres each year.

2.2.2	C	<p>“Use of least toxic and narrowest spectrum pesticide narrowest spectrum and least toxic pesticides necessary to achieve management objective.”</p> <ul style="list-style-type: none"> • Glyphosate (Roundup Accord), Triclopyr (Garlon 4), Imazapyr (Arsenal), and Metsulfuron methyl (Escort) are the chemicals occasionally used on the lands within the scope, often for control of invasives, but also for site preparation. These are generally low toxicity and narrow spectrum.
2.2.3	C	<p>“Use of pesticides registered for the intended use and applied in accordance with the label requirements.”</p> <ul style="list-style-type: none"> • The SEQR review process leads to an approved prescription according to label requirements.
2.2.4	C	<p>“Use of Integrated Pest Management where feasible.”</p> <ul style="list-style-type: none"> • An IPM approach that includes minimizing chemicals and use of alternatives is embedded in the SEQR process, which is a robust pre-use screening and documentation process.
2.2.5	C	<p>“Supervision of forest chemical applications by state-trained or certified applicators.”</p> <ul style="list-style-type: none"> • This is required by NY law and by Bureau of State Land Management protocols.
2.2.6	C	<p>“Use of best management practices appropriate to the situation; for example ...”</p> <ul style="list-style-type: none"> • Chemical BMPs are embedded in the prescriptions, required by law, and contractors are trained.
2.3	C	<p><i>“Program Participants shall implement management practices to protect and maintain forest and soil productivity.”</i></p>
2.3.1	C	<p>“Use of soils maps where available.”</p> <ul style="list-style-type: none"> • GIS includes soils information • Foresters have good working knowledge of soils present and their characteristics and limitations.
2.3.2	MIN	<p>“Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.”</p> <p><u>Refer to Minor Non-conformance NYSLM-2007-05 under 2.3.4 below.</u></p> <ul style="list-style-type: none"> • Field observations at sites visited provided extensive evidence of the many measures taken to protect site productivity, including planning, job layout and supervision • The auditors observed excessive rutting and limited but problematic soil compaction in portions of many sites visited. • Specifications on harvesting equipment (weight limits) are employed occasionally. • Foresters can and often do stop harvests when weather conditions dictate; most loggers know to stop before causing soil problems, but many others apparently do not.
2.3.3	C	<p>“Use of erosion control measures to minimize the loss of soil and site productivity.”</p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited that water-bars are employed where needed.
2.3.4	MIN	<p>“Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails).”</p> <p><u>Minor Non-conformance NYSLM-2007-05:</u> <u>Deep rutting and extensive soil compaction were observed at five sites visited by the team</u> <u>Modest to severe rutting was found on sites in nearly every office (sub-region) visited. Rutting</u> <u>criteria (see Indicator 2.3.6) either are not clear, are not enforced consistently, or are not</u> <u>accepted by field foresters. Processes to identify soils vulnerable to compaction and use of</u> <u>avoidance methods (see Indicator 2.3.2) may be inadequate.</u></p> <ul style="list-style-type: none"> • Field observations at sites visited provided extensive evidence of the many measures taken to protect site productivity, including planning, job layout and supervision • Retained woody debris was present in reasonable amounts in nearly all areas after

		<p>harvest; standards exist and are met or exceeded</p> <ul style="list-style-type: none"> • The great majority of field sites visited have good to excellent trail layout; some sites visited had difficult layout options and results did not meet expectations • The past two winters have been challenging for all logging in the region, with difficult ground conditions including lack of frost and unusual patterns of temperature fluctuations; foresters and loggers have struggled to adjust
2.3.5	OFI	<p>“Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area.”</p> <p><u>There is an opportunity to improve in the area of residual stand damage.</u></p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited that partial harvests focus on the removal of the least vigorous, poorest quality trees. Accepted and appropriate silvicultural guidelines are employed to guide the prescriptions. Stand analysis methods (generally following SILVAH or similar methods) are routinely employed • An excessive number of trees were damaged by tree felling and skidding at a small portion of sites visited by the audit teams. • Innovative methods were observed for minimizing residual stand damage.
2.3.6	MIN	<p>“Criteria that address harvesting and site preparation to protect soil productivity.”</p> <p><u>Refer to Minor Non-conformance NYSLM-2007-05 under 2.3.4 above.</u></p> <ul style="list-style-type: none"> • A literature review has been completed; policy to follow: In response to emerging biomass markets and concerns about whole-tree harvesting, Karin Verschoor, Resource Specialist conducted a literature review and phone interviews as to which soil characteristics should prohibit whole-tree harvesting – • Rutting criteria either are unclear, are not enforced consistently, or are not accepted by field foresters. A “six-inch” definition for excessive rutting was often reported and more often disparaged by field foresters. • Skidding through areas with wet soils is too often done.
2.3.7	C	<p>“Minimized road construction to meet management objectives efficiently.”</p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited. • Roads infrastructure has been developed and maintained over many decades and is critical to the management of these lands and their use and enjoyment by the public • Signs exist that roads are starting to show signs of increased use without increased funding for maintenance
2.4	C	<p><i>“Program Participants shall manage so as to protect forests from damaging agents such as environmentally or economically undesirable wildfire, pests and diseases to maintain and improve long-term forest health, productivity and economic viability.”</i></p>
2.4.1	C	<p>“Program to protect forests from damaging agents.”</p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited.
2.4.2	MIN	<p>“Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.”</p> <p><u>Minor Non-conformance SLM-2007-07: Overstocking due to delayed thinning has led to diminished vigor of planted conifers and some subsequent insect problems.</u></p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited that many plantations planted off-site have fallen apart or are in advanced stages of declining tree health and vigor. • Trees in many plantations have also declined in vigor due to delays in thinning caused by staffing shortages.
2.4.3	C	<p>“Participation in, and support of, fire and pest prevention and control programs.”</p> <ul style="list-style-type: none"> • Fire control program is outside of the Division of Lands and Forests • Extensive pest control activities
2.5	N.A.	<p><i>“Program Participants that utilize genetically improved planting stock including those derived through biotechnology shall use sound scientific methods and follow all applicable laws and other internationally applicable protocols.”</i></p>

2.5.1	N.A.	<p>“Program for appropriate research, testing, evaluation and deployment of genetically improved planting stock including trees derived through biotechnology.”</p> <ul style="list-style-type: none"> Genetically improved stock is not used.
3.1	C	<p><i>“Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality laws and meet or exceed Best Management Practices developed under Environmental Protection Agency (EPA)-approved state water quality programs other applicable federal, provincial, state or local programs.”</i></p>
3.1.1	MIN	<p>“Program to implement state or provincial equivalent BMPs during all phases of management activities.”</p> <p><u>Minor Non-conformance NYSLM-2007-06:</u> <u>Description: At a recently repaired stream crossing on the Public Forest Access Road in Broome Tioga 2 (Beaverdam Forest) the outlet of the repaired culvert crossing of the first and largest stream is perched above the pond below the road forming a barrier to the passage of aquatic organisms. This particular culvert was not replaced, though an opportunity to resolve BMP compliance issues was missed. A similar problem was observed at a site in the Bath Region. NY State Best Management Practices for Water Quality state “avoid disrupting migration or movement of aquatic organisms” (page 38) and “culverts should not cause damming or pooling” (page 43). BMP monitoring does not cover roads or local sales.</u></p> <ul style="list-style-type: none"> Field observations at sites visited showed that BMPs were applied correctly when needed at most locations.
3.1.2	C	<p>“Contract provisions that specify BMP compliance.”</p> <ul style="list-style-type: none"> Confirmed by review of contracts for sample of selected sites
3.1.3	OFI	<p>“Plans that address wet weather events (e.g., inventory systems, wet weather tracts, defining acceptable operational conditions, etc).”</p> <p><u>There is an opportunity to improve provisions for managing wet weather events.</u></p> <ul style="list-style-type: none"> Although Bureau of State Land Management is not required to provide work opportunities for loggers during wet seasons, current policies managing this issue were severely tested over the past two warm, wet winters.
3.1.4	MIN	<p>“Monitoring of overall BMP implementation.”</p> <p><u>Refer to Minor Non-conformance NYSLM-2007-06: BMP monitoring does not cover roads or local sales.</u></p> <ul style="list-style-type: none"> Confirmed monitoring program for revenue sales, but not existing for local sales, or for roads.
3.2	C	<p><i>“Program Participant shall have or develop, implement, and document, riparian protection measures based on soil type, terrain, vegetation and other applicable factors.”</i></p>
3.2.1	C	<p>“Program addressing management and protection of streams, lakes and other water bodies and riparian zones.”</p> <ul style="list-style-type: none"> NY BMPs address this issue, but implementation of adequate riparian buffer zones was not consistent. Example: First site viewed by D.D. and S.G. at Lowville. A new policy is under development for protection of wetlands and riparian zones
3.2.2	C	<p>“Mapping of streams, lakes and other water bodies and riparian zones, and where appropriate, identification on the ground.”</p> <ul style="list-style-type: none"> GIS layers include streams, lakes, and other wetland features Confirmed by field observations at sites visited that such areas are routinely removed from sale areas, and marked on the ground with paint (two lines) designating tract or sale boundaries.
3.2.3	C	<p>“Implementation of plans to manage or protect streams, lakes and other water bodies.”</p> <ul style="list-style-type: none"> Confirmed by field observations at sites visited that such features are protected.
3.2.4	OFI	<p>“Identification and protection of nonforested wetlands, including bogs, fens, vernal pools and marshes of significant size.”</p> <p><u>There is an opportunity to improve methods to identify wet areas within harvest blocks and</u></p>

		<p><u>prevent avoidable damage caused by logging equipment.</u></p> <ul style="list-style-type: none"> • Field observations at most sites visited showed that these areas are generally protected, with good practices on those areas that are of significant size. • Small forested and non-forested seeps and drains with soils sensitive to compaction and/or rutting are occasionally damaged.
3.2.5	N.A.	<p>“Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.”</p> <ul style="list-style-type: none"> • N.A. – BMPs do exist in N.Y.
4.1	C	<p><i>“Program participants shall have programs to promote biological diversity at stand- and landscape- scales.”</i></p>
4.1.1	C	<p>“Program to promote the conservation of native biological diversity, including species, wildlife habitats, and ecological or natural community types, at stand and landscape levels.”</p> <ul style="list-style-type: none"> • The NY DEC Division of Lands and Forests conducts a proactive program to identify, protect, and enhance, by active and directed management, rare plant and animal species and significant natural plant communities. Emphasis is also placed on managing habits positively for the benefit of game and non-game species that are of recreational interest, but which are not recognized as rare. Consistent emphasis among all regions is upon species and habitats at the stand (management unit) level: more forward-looking regions model species and habitats at the landscape level, characterizing composition of landscapes enclosing management units by forest type, hardwood/softwood composition, proportion of long-lasting conifers (spruce and hemlock), successional stage including old-growth, even-aged/uneven-aged characteristic. Proactive steps are taken to provide minimal amounts of habitat components within management units. • NY DEC Division of Lands and Forests entered into a cooperative agreement with The Nature Conservancy for compilation of biodiversity inventory of flora and fauna within all State Forests and Unique Areas to identify rare (threatened, endangered, sensitive) species and significant natural communities at State, Global, and U. S. Federal levels. Locations of identified rare species/significant natural habitats are mapped, and areas so identified are protected from management operations that might cause adverse effect. Prior to initiation of stand-disturbing management activities, including construction of haul and skid roads, field foresters are directed to identify these areas and prevent active management from occurring within their boundaries. • During initial stages of stand preparation for management activities (primarily timber harvest) foresters flag trees containing nests of raptors and construct circles of 150-300’ radii about them: such circled areas are protected as “no management - no entry” zones. • For rare plants/communities which might benefit from proactive management (e.g., prescribed burning to retain native grassland, selected overstory removal to enhance habitat for a rare, shade-intolerant herb) Bureau of State Land Management foresters conduct appropriate, peer-reviewed management activities to enhance the populations/communities. • Scale of protection/habitat enhancement varies across Regions: foresters in some regions utilize searches of the Natural Heritage data base for locations of known rare species/natural communities and provide protection at the stand level. Foresters in other regions develop computer models of habitats using NY Gap Analysis Program and model projected landscapes, with attendant wildlife species/communities, across landscapes encompassing management units within individual State Forests. • Rare habitats such as maturing forest that may progress to old-growth like characteristics are identified and protected as “natural areas” from active timber harvest. Habitats in low proportion relative to naturally occurring prevalence (e.g., early succession habitat) are created through appropriate management activities (primarily timber harvest).

4.1.2	C	<p>“Program to protect threatened and endangered species.”</p> <ul style="list-style-type: none"> • The NY DEC Division of Lands and Forests has developed, and implemented in most regions, an exemplary program to identify and afford protection to threatened, endangered, and rare plants and animals, and significant natural communities. Depending on staffing level, individual interests, and administrative direction, this program varies in intensity and conduct among regions. Staffing levels raise concerns about the ability to continue high-quality implementation even where staff have made this a high priority. When evidence is provided that this program is fully implemented in all regions a finding of “Exceeds the Standard” will be warranted. • Activities designed to identify threatened and endangered species, and significant natural communities, are comprehensive and include: 1) active searches of literature; 2) queries of Natural Heritage database; and 3) field observation of areas containing unique habitats/plant communities are identified formally and informally, are identified as “Unique Areas,” and are afforded protection (identified as no-entry, no active management zones, unless management activities are prescribed to enhance/maintain required habitat) from activities that might endanger them. • The NY DEC Division of Lands and Forests contracted with The Nature Conservancy to conduct a comprehensive survey to upgrade the existing data base on threatened, endangered, and rare flora and fauna. Additionally, the program provided a description for, and identification of, areas of existing/potential old-growth forest. • Areas identified as containing, or potentially containing, endangered, threatened, or sensitive species are identified on maps, protected by buffer zones, and identified as no-entry-no timber harvest areas. Timber harvest or other activities are permitted if they are designed to enhance/maintain habitat for threatened, endangered, or rare species.
4.1.3	OFI	<p>“Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies.”</p> <p><i>Summary: The NY DEC Division of Lands and Forests has in place a comprehensive program to identify and locate critically imperiled and imperiled species, their habitats, and significant natural communities. Plans for protection of such species, habitats, and communities vary in intensity, collaboration with others within and without the Division, and degree of thoroughness among regions.</i></p> <p><u>There is an opportunity to improve the consistent use of the heritage database.</u></p> <ul style="list-style-type: none"> • Activities for identification and protection of species and communities at risk generally greatly exceed the protection of G1 and G2 sites (see following bullets). However, no evidence was provided of a consistent process for ensuring imperiled species and communities recently and located and/or identified (or other less imperiled sites) are quickly made available for use at region and unit management levels so as to effect the immediate protection of such species and communities. • The partnership between the DEC Division of Lands and Forests and The Nature Conservancy to re-assess presence of threatened, endangered, and rare species, and significant natural communities is among the best in the nation in terms of comprehensiveness, and involvement of stakeholders and sister agency personnel (e.g., Division of Fish and Wildlife). • When species and/or habitats/significant natural communities judged to be potentially imperiled are formally/informally identified by Division personnel or stakeholders, areas supporting species/habitats/significant natural communities may be formally/informally identified as “unique areas” and afforded protection from habitat-altering management activities that would negatively impact them. The process of acquiring/protecting unique areas may involve land exchanges with other entities. • Degree of implementation of protection for critically imperiled/imperiled species and communities varies among regions. Lists of species and communities, by

		<p>classification (global, federal, state and degree of imperilment) and by region, are/will be available from the revised and on-going Biodiversity Inventory conducted by The Nature Conservancy, but field evaluation indicates that not all regions utilize/are aware of species/communities, especially those at the higher degree of imperilment (global and federal levels).</p> <ul style="list-style-type: none"> • For regions where study in 4.2.1 is incomplete the process used to review for G1 and G2 species was described as: “A search has been made of the Natural Heritage database of all G1, G2, and G2G* rated element occurrences on State Forests. The search only yielded two hits. One is the Oak Openings on Rush Oak Openings State Forest and the other is Bayard's Adder's-mouth Orchid on the Albany Pine Bush. We have been managing Rush Oak openings for years to perpetuate that important community. The orchid's future is in good hands as well since The Nature Conservancy manages that property which includes a mosaic of several government ownerships. In any event, an e-mail has been sent to our managers and the Pine Bush with a map of the occurrence and the TNC fact sheet that goes along with it.” • Confirmed that these two sites are marked on maps, staff and managers are aware of these sites, and that plans and provisions have been made for their protection.
4.1.4	C	<p>“Development and implementation of criteria, as guided by regionally appropriate science, for retention of stand-level wildlife habitat elements (e.g., snags, mast trees, down woody debris, den trees, nest trees).”</p> <p><i>Summary: The NY DEC Division of Lands and Forests has in place either written guidelines or informally designated guidelines (in the absence of scientific criteria) for retention of stand-level wildlife habitat elements including snags, mast trees, down woody debris, den trees, and stick nests. In Regions 7 & 8 (two of three visited) the forest management plans for developing and implementing wildlife habitat elements are more comprehensive and quantitative.</i></p> <ul style="list-style-type: none"> • Written, quantified guidelines are available and used at the field level for retention of stand-level wildlife habitat elements such as snags, mast and den trees, down woody debris. Current management plans include sections to address habitat “gaps” in surrounding landscapes: one of the gap actions provides for coarse woody debris in the form of at least one-three den and three snag trees retained per acre during forest management activities. Where snag/den trees do not exist, declining trees will be retained to provide future den/snag trees (Tioga Unit Management Plan, Region 7); other Unit Management Plans (Six Nations Unit Management Plan, Region 7) call for creation of snags by girdling trees where no snags exist. • Plans include increasing proportion of young early successional forest as a key habitat. • Aspen stands are managed on 60-year rotation cycles to perpetuate optimal aspen habitat. • Retention and regeneration of hemlock and spruce as key wildlife conifer components. • Reduction of “fragmentation” by maintaining intact areas with continuous canopy cover with minimal openings (1/4 to 1/3 acres). • Set-asides of areas identified as “natural areas” (areas with steep slopes, wet woodlands, riparian zones) linked to areas protected from forest fragmentation (see above). • Where scientific guidelines are not available for providing protection for stand-level wildlife habitat elements, field staff, in collaboration with Division of Wildlife and Fisheries personnel and staff from adjacent regions, devise appropriate and liberal recommendations for protection (e.g., marking and reserving from active management areas of 150’-300’ radius for protection of hawk and owl stick nests in trees, restricting timber harvesting activities in areas near to identified stick nests during the breeding season [March 1 – July 31]; retention of coarse woody debris on the ground by leaving tops of harvested trees on sites, hauling unused logs back onto sites from landings).

4.1.5	OFI	<p>“Assessment, conducted individually or collaboratively, of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities, where practical and when consistent with management objectives.”</p> <p><i>Summary: The NY DEC Division of Lands and Forests collects data (stand inventory) that provides assessment for forest cover types and habitats at unit (stand) level. Aggregation of stand level information is utilized by some, but not all regions, into landscape-level assessment of habitats. Similarly, incorporation of forest cover type and habitat assessments into planning and management activities varies from region to region.</i></p> <p><u>There is an opportunity to improve habitat evaluation/enhancement, including small scale and landscape level assessments, by consistently implementing the most successful approaches to comprehensive landscape analysis across regions.</u></p> <ul style="list-style-type: none"> • Overstory inventories conducted at the stand level by all units within all regions characterize forest cover types across NY DEC SLM units. Because this data set includes tree species, size class, stocking levels, successional stage, and acceptable/unacceptable grade, most major habitat characteristics related to overstory tree canopy (conifer/hardwood, mast-bearing trees, successional stage, snag/den trees) can be inferred from analyses of overstory tree data. Other habitat characteristics (riparian/wetland including bogs, fens, vernal pools, rocky outcrops, unique habitats such as grasslands, raptor stick nests) are obtained from the on-going biodiversity inventory, state-wide GIS program, and discovery, location, and mapping by field foresters of such habitats as identified in the field. Degree of comprehensiveness of such characterizations varies among regions. • In two of the three regions visited, landscape level assessment of habitats (unit lands and surrounding non-DEC lands) is conducted to produce estimates of proportion of successional stages, degree of forest fragmentation, amount of “long-lived” conifer (hemlock, spruce) and oak cover, and provision for maintenance/enhancement of all-aged (uneven-aged) stands with shade-tolerant hardwoods and softwoods. • The GIS program developed by central staff provides landscape level assessment/characterization of forest cover types and habitats and is aggressively and innovatively utilized within some regions, whereas characterization in other regions is not as advanced
4.1.6	EXR	<p>“Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership.”</p> <p><i>The NY DEC Division of Lands and Forest does an exceptional job of supporting and participating in plans and programs for the identification, conservation, maintenance, and development of old-growth forests.</i></p> <ul style="list-style-type: none"> • The NY DEC Division of Lands and Forests protects from timber harvest, sale, or exchange, thousands of old-growth/potential old-growth with New York State Forest Preserves in the Adirondack and Catskill Parks, as directed by the New York State Constitution. • The DEC SLM, in concert with The Nature Conservancy, provided a working definition of old-growth: the on-going Biodiversity Inventory conducted jointly by SLM and TNC has as one goal the identification of old-growth and potential old-growth areas. • Lands formally identified as old-growth are protected from harvest and other management activities that might negatively impact old-growth characteristics. • The Division of SLM has an old-growth policy that states that any stand over 150 years in age is approaching old-growth characteristics and is to be protected from management activities that might alter the trajectory to old-growth. • Areas identified as Natural Areas in Unit Management Plans are protected from active forest management and have the potential to progress to true old-growth forest in patches large enough to function as old-growth.

4.1.7	EXR	<p>“Participation in programs and demonstration of activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plant and animal communities.”</p> <p><i>The NY DEC Division of Lands and Forests provides training and other aides (brochures, pamphlets) for its staff and publics regarding identification, location, spread, and treatment of exotic plants and animals in an effort to limit introduction, impact and spread of invasive plants and animals. The DEC SLM participates in experimental programs designed to identify best practices for controlling spread of invasive exotic plants and animals and supports research designed to identify, survey, and control exotic invasive plants and animals. Where necessary, spot treatment of invasive exotic plants is conducted using integrated pest management. These activities exceed the SFI requirement for working to control exotic invasive species.</i></p> <ul style="list-style-type: none"> • Karin Verschoor, Resource Specialist, acts as their Outreach Coordinator nearly full-time and does some special project including GIS; very active in helping teach the public about the importance of controlling exotic invasive plants. Confirmed numerous articles, posters, workshops, and a major exhibit at the state fair. • Research by Karin Verschoor developed a protocol for control of Japanese knotweed. • Other research supported by DEC SLM includes: invasive plant (non-specified) inventory; Asian longhorned beetle study; Sirix wasp survey; and spreading globeflower study. • A non-native and spreading Phragmites and another plant (black swallowwort) in the Labrador Hollow Unique Area are being controlled by a combination of manual removal and hand-clipping - spot herbicides (Rodeo for swallowwort, and Garlon 4 for phragmites) application. Gallerucella beetles released for control of purple loosestrife.
4.1.8	C	<p>“Program to incorporate the role of prescribed or natural fire where appropriate.”</p> <ul style="list-style-type: none"> • Although the northern hardwood forest comprising much of DEC SLM lands, including pine and spruce plantations, are not fire-ecology forests, the DEC SLM utilizes fire to maintain and restore native grasslands. • For example, interviews and review of documents confirmed that controlled fire is utilized on the Rome Sand Plain and Rush Oak sites to maintain and enhance native grasslands.
4.2	EXR	<p><i>“Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.”</i></p>
4.2.1	EXR	<p>“Collection of information on critically imperiled and imperiled species and communities and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.”</p> <p><i>Exceeds the Standard: The NY DEC Division of Lands and Forests has in place a comprehensive program to identify and locate critically imperiled and imperiled species, their habitats, and significant natural communities through collection of requisite field data, interviews with local experts, and information provided by its field staff.</i></p> <ul style="list-style-type: none"> • The DEC SLM is engaged in a cooperative venture with The Nature Conservancy to provide a comprehensive inventory (Biodiversity Inventory) of imperiled plants and animals at state (S1 and S2) and global (G1, G2, and G3) levels for state forests and forest preserves, region by region. The inventory also is identifying and inventorying potential and/or actual old-growth forests and significant natural communities. This process is on-going and should be completed within 1-2 years. • Regions where the Biodiversity Inventory is completed have access to, and often do compile comprehensive lists of imperiled species, including those ranked G1 and G2. Management Units with management plans list state and globally imperiled species and proactively protect sites of know or potential occurrence of these species, as well as for significant natural communities.

		<ul style="list-style-type: none"> • After the inventory is updated, any new identifications of imperiled species or significant natural communities (or old-growth) are recorded by the state Natural Heritage Database, but there is no planned process for notifying individual regions of these new additions (see OFI under Indicator 4.1.3 above). • For Regions without a completed Biodiversity Inventory, the state Natural Heritage Database may be queried to identify known sites for existing or potentially existing state and globally-ranked plants and animals. Field inquiries of field staff regarding presence of G1 and G2 species were varied: regions with completed Biodiversity Inventories knew how to find out loci for such species and proactively protected and enhanced these species; in the region without a completed inventory field staff seemed unaware of how to locate and protect such sites/species.
4.2.2	EXR	<p>“A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.”</p> <p><i>The use of research regarding biodiversity and ecosystem protection exceeds the standard.</i></p> <ul style="list-style-type: none"> • Recently-completed unit management plans (at least for Regions 7 and 8) for the NY DEC Division of Lands and Forests have an objective for addressing habitat gaps in landscape analyses of lands surrounding and including management units. The GIS program developed by the central staff is utilized in concert with the NYS Gap Analysis program to identify under-represented habitat types, forest types, successional stages, and habitat components such as snags and den trees, which form the basis for proactive management planning to provide additional acreage of under-represented habitats. • In regions where the Biodiversity Inventory is completed, habitats for imperiled species and significant natural communities are identified, mapped, and protected from forest management activities that might be detrimental. Appropriate literature is searched and utilized to provide relevant research results for incorporation into management plans and activities. • Research supporting characterization and protection of biodiversity is funded and utilized by the DEC SLM in management planning as found in unit management plans.
5.1	EXR	<i>“Program Participants shall manage the impact of harvesting on visual quality.”</i>
5.1.1	EXR	<p>“Program to address visual quality management.”</p> <ul style="list-style-type: none"> • SLM foresters plan and implement all harvests. These foresters are trained in or aware of visual management methods. • Sales are reviewed by highly experienced supervising foresters and regional foresters prior to approval; most larger sales also undergo “Conceptual approval” by the SLM Albany office, ensuring consistency and allowing consideration of best practices sharing between regions. • Recreational management includes visual considerations. “To protect backcountry resources and ensure the quality of visual aesthetics, New York State law requires that all campsites be located at least 150 feet from any water source, trail or road, unless otherwise designated by the Department.” http://www.dec.ny.gov/outdoor/9151.html • The Visual Resources Guideline (not available online at public website) describes the evaluation of visual resources for SEQR http://www.dec.ny.gov/pubs/4813.html
5.1.2	EXR	<p>“Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.”</p> <p><u>Plans and implementation of projects result in superb visual quality results.</u></p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited that SLM foresters are consistently planning and implementing harvests which minimize or avoid visual impacts. • Salvage harvests are challenging, especially along roads and trails; varied methods are used to minimize visual impacts with reasonable results.

5.2	C	<i>“Program Participants shall manage the size, shape, and placement of clearcut harvests.”</i>
5.2.1	C	<p>“Average size of clearcut harvest areas does not exceed 120 acres, except when necessary to respond to forest health emergencies or other natural catastrophes.”</p> <ul style="list-style-type: none"> • Confirmed that few clearcuts are done; most often shelterwood systems are used, and even these rarely approach 120 acres.
5.2.2	C	<p>“Documentation through internal records of clearcut size and the process for calculating average size.”</p> <ul style="list-style-type: none"> • Acres of planting are recorded on maps and in databases; never clearcut unless DAR is present or unless there is an approved plan for planting.
5.3	C	<i>“Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.”</i>
5.3.1	C	<p>“Program implementing the green-up requirement or alternative methods.”</p> <ul style="list-style-type: none"> • Only 305 acres were planted over the past 2 years, averaging fewer than 2% of treated areas. Planning processes ensure that the rare clearcuts are not adjacent; in most cases planting is done in small pockets within stands being regenerated using shelterwood systems, avoiding the need to formally review “green-up”
5.3.2	C	<p>“Harvest area tracking system to demonstrate compliance with the green-up requirement or alternative methods.”</p> <ul style="list-style-type: none"> • Records are superb; sales are generally widely separated; foresters have long tenure within their forests and often know stand histories for decades. In such a system the green-up requirements are easily met.
5.3.3	C	<p>“Trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Program Participant.”</p> <ul style="list-style-type: none"> • Confirmed by field observations at sites visited that adjacent areas are not clearcut, that clearcuts are rare, and that most clearcuts are bordered by areas regenerated using shelterwood systems.
6.1.	C	<i>“Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.”</i>
6.1.1	C	<p>“Use of existing natural heritage data and expert advice in identifying or selecting sites for protection because of their ecologically, geologically, historically, or culturally important qualities.”</p> <ul style="list-style-type: none"> • Confirmed by review of documents and by interviews that the NY DEC Division of Lands and Forests identifies and protects sites based on ecological, historical and cultural importance. • The joint DEC/TNC program for updating the Natural Heritage Database is providing exceptionally comprehensive identification of ecologically important sites for protection. • Archaeological inventories maintained by the New York State Museum and Office of Parks, Recreation, and Historic Preservation are searched prior to site altering activities for identification/location of protected cultural resources on or near management units. • Interview with field staff revealed uneven training/emphasis on identification, mapping, and protecting of cultural or historical characteristics of sites. (See Indicator 10.1.3 and associated Minor Non-conformance.)
6.1.2	EXR	<p>“Appropriate mapping, cataloging, and management of identified special sites.”</p> <p><i>The NY DEC Division of Lands and Forests identifies and protects known special sites, and makes efforts to find new sites for protection.</i></p> <ul style="list-style-type: none"> • Sites of ecological importance (harboring S1, S2, S3, G1, G2 species, or representing unique natural habitats) are identified on detailed maps, identified according to their

		<p>status and category, and managed for protection and enhancement.</p> <ul style="list-style-type: none"> • Other special habitat components as may be identified (e.g. stick nests of raptors) are also identified, mapped, cataloged and protected.
7.1	C	<p><i>“Program Participants shall employ appropriate forest harvesting technology and “in-woods” manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives.”</i></p>
	C	<p>“Program or monitoring system to ensure efficient utilization, which may include ...”</p> <ul style="list-style-type: none"> • Confirm by field observations at sites visited that utilization is good; foresters monitor during sale supervision for contracts requiring utilization. • A formal policy exists concerning maintenance of state boundaries; a 7-year cycle is the goal; a consistent approach is emphasized and was apparent in the field
9.1	C	<p><i>“Program Participants shall individually, through cooperative efforts, or through associations provide in-kind support or funding, in addition to that generated through taxes, for forest research to improve the health, productivity, & management of forest resources.”</i></p>
9.1.1	C	<p>“Current financial or in-kind support of research to address questions of relevance in the region of operations. The research will include</p> <ol style="list-style-type: none"> forest health, productivity, and ecosystem functions; chemical efficiency, use rate, and integrated pest management; water quality; wildlife management at stand or landscape levels; conservation of biological diversity; and effectiveness of BMPs” <p>The Division of Lands and Forests allows SUNY and others to conduct research on state forest lands – these temporary revocable permits have enabled the following types of research:</p> <ul style="list-style-type: none"> • A. health, productivity and ecosystem functions • B. Chemical (Dr. Nyland’s research on herbicide to control beech – did he conduct any on your lands?); Confirmed Karin Verschoor, Resource Specialist conducted research on appropriate, minimized chemical use for invasive control • C. Water quality: • D. and E: Wildlife and conservation of biological diversity: DOC cooperative research on various wildlife management subjects such as LIST; NY SLM provided Region 7 preliminary results of an analysis of regeneration and browse sampling on state forests in Shenango County • F. Effectiveness of BMPs
9.2	C	<p><i>“Program Participants shall individually, through cooperative efforts, or through associations develop or use state, provincial, or regional analyses in support of their sustainable forestry programs.”</i></p>
9.2.1	C	<p>“Participation, individually or through cooperative efforts or associations at the state, provincial, or regional level, in the development or use of</p> <ol style="list-style-type: none"> regeneration assessments; growth-and-drain assessments; BMP implementation and compliance; and biodiversity conservation information for family forest owners.” <ul style="list-style-type: none"> • a. Regeneration assessments: Private lands services program works closely with the Forest Service FIA unit; NY SLM Region 7 conducted an extensive analysis of regeneration and browse sampling on state forests in Shenango County and provided preliminary results • b. growth and drain: Private lands services program works closely with the Forest Service FIA unit • c. and d. are part of the private forestry program, which is part of Division of Lands and Forests; conformance; look at again in first Surveillance Audit.

10.1	Major, closed	<p><i>“Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI Standard.”</i></p>
10.1.1	Major, closed	<p>“Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters.”</p> <p><u>Major Non-conformance NYSLM-2007-02 No formal statement of commitment has been circulated throughout the organization.</u></p> <ul style="list-style-type: none"> • Licensee agreement must be completed before a recommendation for certification can be made by the NSF Lead Auditor.
10.1.2	Major, closed	<p>“Assignment and understanding of roles and responsibilities for achieving SFI Standard objectives.”</p> <p><u>Evidence was not provided that the managers with direct line authority to implement corrective actions and decisions during management reviews have been included within the SFI program (roles and responsibilities are not clear).</u></p> <p><u>Note: Combined with Major Non-conformance NYSLM-2007-03 for Indicator 13.1.3</u></p> <ul style="list-style-type: none"> • Roles not assigned beyond central office; staff are not likely to have an understanding of their responsibilities for achieving SFI Standard • Roles for management review do not include direct line supervision for regional personnel
10.1.3	MIN	<p>“Staff education and training sufficient to their roles and responsibilities.”</p> <p><u>Minor Non-conformance NYSLM-2007-08: Foresters are quite competent and many have maintained current with science and practice, which are rapidly expanding. However foresters are not consistently trained in or knowledgeable about topics that should be within their full scope of roles and responsibilities under the ecosystem management approach adopted by the Bureau of State Land Management. Further, there is no BMP training for road construction/ road grading staff.</u></p> <ul style="list-style-type: none"> • DOC sends staff a training email describing training opportunities; there is no formal record of training for each forester • Review of data, interviews with employees, and information from external stakeholders confirmed persistent and widespread staffing shortages have manifested in limited time for training (and many other challenges) • Supervisors and foresters desire to (and often do) excel in caring for the land and responding to the public, especially recreational users and neighbors concerned about management practices, but training generally gets insufficient attention in the face of more immediately pressing needs; • Foresters are trained in GIS and generally (but not always) use the heritage database to determine RTE, cultural sites which are already known and mapped; under ecosystem management they would be expected to add to this heritage database. • Interviews with field staff revealed uneven training/emphasis on identification, mapping, and protecting of cultural or historical characteristics of sites. • Some foresters know the names of the listed (RTE) species that could be present in the types they manage; fewer can recognize these species in the field making it unlikely that all reasonable measures are taken to protect and enhance their habitat • Foresters are not all aware of retention policy and evidence was not provided that all field personnel have a complete and up-to-date understanding of green-tree retention and other stand- and landscape-level techniques for biodiversity enhancement that are easily incorporated into sale design • All new employees undergo a two-year forester trainee-ship program that includes technical training and in-region assignments in a variety of regions (reserve, rural, urban, central office)

10.1.4	MIN	<p>“Contractor education and training sufficient to their roles and responsibilities.”</p> <p><u>Minor Non-conformance NYSLM-2007-04: There are no formal training requirements for loggers.</u></p> <ul style="list-style-type: none"> • Loggers have BMP manuals and all logging is overseen by trained foresters; conceptually could require that at least one-logger in each firm will have training • Most Bureau of State Land Management contractors have been mailed a field guide for BMPs • Logger training and certification programs are available that include training regarding safety, BMPs, and forest management concepts, and at least some loggers have completed these programs.
10.2	C	<p><i>“Program Participants shall work closely with state logging or forestry associations, or appropriate agencies or others in the forestry community, to foster improvement in the professionalism of wood producers.”</i></p>
10.2.1	C	<p>“Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers’ training courses...”</p> <ul style="list-style-type: none"> • The logger training and certification program that NY SIC operates covers both environmental protections/BMPs and safety training • David Forness, DOC attends SIC meetings; New York State DOC will provide a contribution to SIC • Confirmed through interview of SIC staff that NY DEC is participating in the SIC (not yet a dues paying member, but they are showing up)
11.1	C	<p><i>“Program Participants shall take appropriate steps to comply with applicable federal, provincial, state, and local forestry and related environmental laws and regulations.”</i></p>
11.1.1	C	<p>“Access to relevant laws and regulations in appropriate locations.”</p> <ul style="list-style-type: none"> • Confirmed access to and comprehensiveness of the NY DEC internal web site and public web site for staff • Training of staff and BMPs help with compliance to wetlands crossings laws • Public website includes full text of current and proposed DEC regulations and additional information http://www.dec.ny.gov/65.html
11.1.2	C	<p>“System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.”</p> <ul style="list-style-type: none"> • NY DOC is also the environmental regulator for the state and thereby set a high bar for themselves • Sale review process whereby experienced senior managers must review and sign off on all conceptual sale approval and on all sale completion and inspection reports; this allows for a review of legal and regulatory compliance by the agency’s most experienced specialists and managers • The Forest Ranger Annual Report from 2003 is available online: http://www.dec.ny.gov/regulations/2371.html: “In 2003 Rangers issued 335 stream crossing permits and inspected 800 sites. Rangers also made 1,188 inspections of State land temporary revocable permits (TRPs), timber harvesting contracts and Adopt a Natural Resource Permits.” • Information about permit process is available online: http://www.dec.ny.gov/permits/363.html
11.1.3	C	<p>“Demonstration of commitment to legal compliance through available regulatory action information.”</p> <ul style="list-style-type: none"> • No evidence was found of any violation of local or Federal laws or Safety violations or citations by the Department of Environmental Conservation. • There was one lawsuit against the Department ten years ago that primarily involved Accessibility for individuals with disabilities into the Forest Preserve. (Lands not

		<p>included in this audit) The settlement has helped DOC improve ADA compliance on all its lands including State Forests. Evidence of this extensive program was confirmed.</p> <ul style="list-style-type: none"> Confirmed by discussions with permitting staff in NY DOC, Permitting Division Region 9 (jurisdiction including water and BMPs) Ken Taft, Deputy Regional Permit Administrator, Region 9, NYSDEC Information about permit applications and their status is available online: http://www.dec.ny.gov/permits/363.html Public website includes an “Archive covering 14 years of Commissioner’s decisions and rulings”: http://www.dec.ny.gov/hearings/395.html
11.1.4	N.A.	<p>“Adherence to all applicable federal, state, & provincial regulations and international protocols for research & deployment of trees derived from improved planting stock & biotechnology.”</p> <ul style="list-style-type: none"> NA: Not doing active tree breeding. Check in with the state forest nursery - NY State Tree Nursery specializes in providing native planting stock using local seed sources, and does not participate in tree improvement programs
11.2	C	<p><i>“Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the Program Participant operates.”</i></p>
11.2.1	C	<p>“Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, antidiscrimination and anti-harassment measures, workers’ compensation, indigenous peoples’ rights, workers’ and communities’ right to know, prevailing wages, workers’ right to organize, and occupational health and safety.”</p> <ul style="list-style-type: none"> Interviews with seasonal employees, long-term staff, and union representative confirm that close attention is paid to all of these issues; policies are in place Confirmed all employees must have sexual harassment training; all new employees undergo a one- or two-year forester traineeship program that includes social policies Training is available and encouraged, but generally not required. Online newsletter and internal website/intranet provide additional information. DEC has an Office of Environmental Justice that “serves the environmental needs of minority and low-income communities” http://www.dec.ny.gov/public/333.html Extensive program to comply with Americans with Disabilities Act (ADA) and DEC has a FOIL staff person.
12.1	C	<p><i>“Program Participants shall support and promote efforts by consulting foresters, state and federal agencies, state or local groups, professional societies, and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.”</i></p>
12.1.1	C	<p>“Support for efforts of SFI Implementation Committees.”</p> <ul style="list-style-type: none"> Confirmed: David Forness, DOC attends SIC meetings; New York State DOC will provide a contribution to SIC
12.1.2	C	<p>“Support for the development and distribution of educational materials, including information packets for use with forest landowners.”</p> <ul style="list-style-type: none"> NY DOC very active in helping teach the public about the importance of controlling exotic invasive plants. Confirmed numerous articles, posters, workshops, and a major exhibit at the state fair Private lands services Extension forestry A listing of publications is available online (http://www.dec.ny.gov/pubs/4796.html) where they can be downloaded or ordered and a seasonal employee is responsible for tracking publications. Many of the listed publications are relevant to forest landowners, but several of the links do not work. Cooperating Forester Program and Cooperating Forest Management Program http://www.dec.ny.gov/lands/5238.html
12.1.3	C	<p>“Support for the development and distribution of regional or statewide information materials that provide landowners with practical approaches for addressing biological diversity issues, such as specific wildlife habitat, critically imperiled or imperiled species, and threatened and</p>

		<p>endangered species.”</p> <ul style="list-style-type: none"> Private lands services New York DEC Division of Lands and Forests provides this information
12.1.4	EXR	<p>“Participation in efforts to support or promote conservation of working forests through voluntary market-based incentive programs (e.g., current-use taxation programs, Forest “Legacy, or conservation easements).”</p> <p><i>New York State’s efforts to protect working forests from development through the use of working forest conservation easements are outstanding. The NY DEC Division of Lands and Forest has lead responsibility for the monitoring of the extensive network of such protected lands.</i></p> <ul style="list-style-type: none"> 616,000 acres of easements in place to date – 616,000 acres (2008 projection 850,000) These conservation easements are managed by DEC; SLM Bureau has lead responsibility 480A tax program provides a current use option for forest landowners
12.1.5	C	<p>“Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders. Consider the results of these efforts in planning where practical and consistent with management objectives.”</p> <ul style="list-style-type: none"> Participated in the development and implementation of the NY State Wildlife Conservation Plan Discussions with field foresters regarding their knowledge of this plan and how it affects their decision-making indicate
12.2	C	<p><i>“Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to forest management.”</i></p>
12.2.1	C	<p>“Support for the SFI Implementation Committee program to address outreach, education, and technical assistance (e.g., toll-free numbers, public sector technical assistance programs).”</p> <ul style="list-style-type: none"> David Forness, DOC attends SIC meetings; New York State DOC will provide a contribution to SIC
12.2.2	C	<p>“Periodic educational opportunities promoting sustainable forestry, such as ...”</p> <p>“Periodic educational opportunities promoting sustainable forestry, such as ...”</p> <ul style="list-style-type: none"> Private lands services are provided by Division of Lands, NY DEC online listing of DEC’s environmental education efforts: http://www.dec.ny.gov/26.html UMPs include goals for public education on state forestlands
12.2.3	EXR	<p>“Recreation opportunities for the public, where consistent with forest management objectives.”</p> <p><i>New York State’s efforts to provide recreational opportunities within the working forests, including reforestation areas and multiple use areas exceed the requirements of SFI.</i></p> <ul style="list-style-type: none"> Recreation opportunities are varied and generally well done Efforts to provide full accessibility are superb
12.3	C	<p><i>“Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.”</i></p>
12.3.1	C	<p>“Involvement in public land planning and management activities with appropriate governmental entities and the public.”</p> <ul style="list-style-type: none"> The UMP process includes “Soliciting written and verbal input from the public through press releases and meetings” and public hearings before the plan is finalized. Draft and completed plans are (or will be) available at the public website. Website includes information about how to comment on a UMP. Staff interviews confirm efforts to inform and invite a broad range of stakeholders. Stakeholder comments confirm opportunities to comment on management planning.

12.3.2	C	<p>“Appropriate contact with local stakeholders over forest management issues through state, provincial, federal, or independent collaboration.”</p> <ul style="list-style-type: none"> Confirmed extensive public contact through a variety of public meetings and public input into UMPs
12.4	C	<p><i>“Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples.”</i></p>
12.4.1	C	<p>“Program that includes communicating with affected indigenous peoples to enable Program Participants to a. understand and respect traditional forest related knowledge; b. identify and protect spiritually, historically, or culturally important sites; and c. address the sustainable use of nontimber forest products of value to indigenous peoples in areas where Program Participants have management responsibilities on public lands.”</p> <ul style="list-style-type: none"> Historic Preservation Officer maintains a contact list to communicate with Tribal Preservation Offices. A review of cultural resources is conducted as required by SEQR, SHPA, and Nat’l Historic Act. Black ash management on state forestlands for traditional uses through the “Adopt a Natural Resource Program”
12.5	C	<p><i>“Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.”</i></p>
12.5.1	C	<p>“Support for SFI Implementation Committee efforts (toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.”</p> <ul style="list-style-type: none"> Confirmed David Forness, DOC attends SIC meetings; New York State DOC will provide a contribution to SIC The Empire State Forest Products Association's phone number (518-463-1297) is published in brochures and on signs at member properties as the contact number for anyone with questions or concerns about the forest management they observe (there isn't a 1-800/toll free number available)
12.5.2	C	<p>“Process to receive and respond to public inquiries.”</p> <ul style="list-style-type: none"> The public can report environmental problems or violations of environmental laws to the DEC by phone or email; http://www.dec.ny.gov/regulations/393.html
12.6	NA	<p><i>“Program Participants shall report annually to the SFI Program on their compliance with the SFI Standard.”</i></p>
12.6.1*	NA	<p>“Prompt response to the SFI annual progress report.”</p> <ul style="list-style-type: none"> NY Bureau of State Land Management was not an SFI Program Participant at the time of the most recent report (March 2007 for 2006).
12.6.2	C	<p>“Recordkeeping for all the categories of information needed for SFI annual progress reports.”</p> <ul style="list-style-type: none"> DEC keeps excellent records; DEC Private Lands Services provides annual reports
12.6.3	NA	<p>“Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI Standard.”</p> <p>NY Bureau of State Land Management has not been an SFI Program Participant in the past, so there have been no past reports.</p>
13.1*	Major, closed	<p><i>“Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in programs, and to inform their employees of changes.”</i></p>
13.1.1	OFI	<p>“System to review commitments, programs, and procedures to evaluate effectiveness.”</p> <p><u>There is an opportunity to improve the system for reviewing programs.</u></p> <ul style="list-style-type: none"> SLM and the Operations Division are under separate lines of authority. The matrix organization makes reviews and priority setting challenging. There are many different forms of management review which closely correspond with SFI Objectives and Performance Measures.

13.1.2	OFI	<p>“System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures.”</p> <p><u>There is an opportunity to improve the system for reporting information to management specific to achieving certification objectives and performance measures.</u></p> <ul style="list-style-type: none"> • The State Forest Section of SLM collects this information and reports it to management • Thus far this process involves the Bureau of State Land Management and the head of the Division of Lands and Forests; regular meetings are held to review information collected and discuss options.
13.1.3	<p>Major, closed</p> <p>Minor</p>	<p>“Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.”</p> <p><u>Closed: Major Non-conformance NYSLM-2007-03</u></p> <p><u>An SFI management review has not been documented, and has not included management with direct line authority to determine changes and improvements. (Note: Had been combined with Major Non-conformance for Indicator 10.1.2</u></p> <p><u>Minor Non-conformance NYSLM-2007-09: The management review system has not been in place long enough to ensure that all SFI issues are covered in the review.</u></p> <ul style="list-style-type: none"> • The system to review all certification-related commitments and non-conformances (employed in the past and presumably still in place) does not include all managers with direct line authority over personnel who carry out the work. • Field foresters and field operations staff (who build and maintain the road, trails, and facilities infrastructure) report through the Division of Operations, then to the Office of Natural Resources, and ultimately to the Commissioner’s Office. Policy staff most knowledgeable about certification and about statewide-issues and performance in moving into ecosystem management report through the Division of Lands and Forests and then to the Office of Natural Resources. • The bureau is working towards certification and has made a good start on assessing its progress towards meeting the SFI requirements. Management review had not been documented at the time of the readiness review and still was not done at the time of the audit.

Other Notes:

Scope of Audit:

Forest management for State Forests managed by the Bureau of State Land Management in Regions 3-9, including Reforestation Areas, Multiple Use Areas, and Unique Areas, and related activities in support of sustainable forestry.

State Forests –750,000 acres (783,350 projected in 2008)

Included - State Forests in Regions 3-9

Regions 1 and 2 are excluded (7,000 acres)

- Region 1 (Long Island’s Nassau and Suffolk Counties): 6,000 acres of mostly Pitch Pine
- Region 2 (New York City): 1,000 acres mostly Staten Island – grasslands near Raritan Bay is the largest tract; have restored Flickers, Meadowlark, etc.



Section C Audit Itinerary

Tuesday, May 15, – Lowville, NY, Region 6

Opening meeting – Introductions of staff, presentation of regional statistics, review site visit itinerary, review organizational structure. Discussed forest inventory system, stand analysis and prescription forms, timber sale process, and treatment goals and accomplishments.

Lewis 32, Stand C21

Stand harvested March 2006. 13 acre White Pine plantation of relatively poor quality with weevil and cancer damage. Local sale procedures followed. No pre-sale check of heritage database for presence of listed species. Sale boundary marked with 3 stripes on boundary trees. Harvest boundary taken to edge of large wetland complex: no buffer zone established or marked. Logger used county road through wetland area. Poor quality corduroy crossing installed and left in place. Many marked trees left uncut. Residual spacing approximately 30' X 30'. Understory species include white pine, spruce, red maple, black cherry, elm, and ash. Skid trails contained moderately deep ruts.

Jefferson 3, Stand E5

Hardwood salvage sale of spring 2006 blowdown. Logged in Fall of 2006 and March 2007. Removed approximately 500 bd.ft./acre. Discussed logging restrictions during “mud season” (March 15-May 15). Access road normally closed during winter months for snowmobile use. Road was open March 1 and logger was able to operate until March 15. Numerous skid trails traversed axis of small wetland area rather than crossing perpendicularly with obvious riparian vegetation present. Deep skid trails throughout unit. Existing landings used. Local sale procedures followed.

Jefferson 3, Stand A34 and A36

39 acres hardwood selection prescription. Reduced basal area from 185 ft² to 110ft². Much CWD left on ground distributed over stand. Snags marked with orange “X”, Rutting not as severe. Good residual stand structure. High amount of residual stand damage due to felling and use of “bumper trees” during skidding. Local sale procedures used. Discussed training for marking crew including some invasive species identification and opportunities for temporary employees to obtain permanent employment.

Jefferson 2, Stands C2, C4.

20 acres thinning of red pine plantation. Landing area OK. Skid trails every third row. Need to put in culvert. DEC owns haul road/county road to centreline.

Wednesday, May 16, – Sherburne NY, Region 7

Opening meeting – Introductions of staff, presentation of regional statistics, review site visit itinerary. Discussed UMP accomplishments, district decision to postpone harvesting activities in units without completed UMPs, annual work plans, local sale procedures that include discretionary \$1,000 bond, and layout of skid trails by foresters.

Madison RA #10, Stand B-32

30 acre mixed stand of Red pine and Norway spruce plantation. Forester noticed decline in stand vigor while doing adjacent stand management prescription. Majority of stand never thinned. Portions of stand previously thinned in much better condition. Followed local sale procedures. Site harvested November, 2006 through January 2007. Boundary marked with double blue marks on boundary trees. Operator instructed to cut all red pine rows within boundary. Left Norway uncut. Timco feller-buncher/forwarder combination used. Waterbars placed on main forwarder roads. Had to shut down because of excessive rutting: the bad spot was water-barred and bulldozed over; was not in wet area. Culvert emplaced and ditched. Old strip thinnings contain good regeneration of maple, beech, and black cherry. Found previously unidentified homestead site consisting of cellar hole, rock pile, domestic vegetation (apple, vinca, etc.), and old road-bed. Seeded landing with mixes of native grasses.

Unscheduled Stop – Madison RA

10 acre clear cut of 25 year old hardwood stand to create early successional shrub habitat. Part of UMP planning process to create and maintain early successional habitat. Discussed conceptual approval forms and preharvest impact assessment procedures.

Madison Reforestation Area #10, Stands B1 and B2

Mostly even-aged Northern hardwood stand dominated by black cherry. Began logging in September 2006. Foresters were given 5-day notice before operations began. Single tree selection prescription. Black cherry tops loped to limit spread of peach bark borer. Discussed merits of retaining shade intolerants in selection silviculture to maintain species diversity. Skid trails well laid out. Forester stopped operations due to excessive rutting on wetter soil types. Water running down the skid trail, should have water-barred better. Was noticeable damage to residual trees.

Morrow Mountain State Forest

Adopt a Natural Resource Program (AARP) with Snow Valley Riders Association. Formal agreement allows trail association to use trail in exchange for trail maintenance and limited construction. Trails remain open to general public. Members are covered under workman's compensation coverage while performing maintenance activities.

Unscheduled Stop #2

Scotch Pine plantation clearcut in June 2006. Hardwoods retained within unit. Objective to create early successional habitat. Forester researched historical records and found location of old building foundation. Avoided site to protect location.

Stoney Pond State Forest

Viewed Nordic ski trail and campground. Kiosk provides trail maps and information. Users asked to sign log. Trails well marked and easily accessible. Trail approved for mountain bike use. SLM working with county to develop larger horse trail system through area. Handicap access fishing pier proposed for lake. Several upgrade made to campground in response to user comments. One campsite

on island removed due to water quality concerns.

Compartment G-4, Brookfield Unit

Large, well-managed spruce plantation that has been thinned many times. Thinned for timber and pulp in 2005, then salvaged wind-thrown trees winter 2006-7. Excellent long-term management.

Compartment F, Brookfield Unit

Former white spruce plantation with hardwood component. Spruce removed 5 years ago, leaving a two-aged stand averaging about 55 sf ba/acre with hardwood poles over dense understory.

Tributary to Shawler Brook at Truck Trail #7, Brookfield Unit

Viewed permanent road crossing at Shawler Brook, a fisheries protected stream. Road needs crowning. Learned that DEC's roads maintenance staff do not have formal training in roads BMPs.

Morrow Road Spur, Brookfield Unit

SLM recently upgraded this previously degraded road; it is now intended for truck use and classified as a Class B Truck Trail. Because there was no digging done beyond stump removal (filled entrenched road with shale and graded) there was no on-site archaeological review. An example of ongoing infrastructure investment.

Stand G-16, Brookfield Unit

Removal of small red pine planted stand to release hardwood trees. The first commercial thin several years ago was done as planned, but the second thinning planned for 2013 was changed to a hardwood release based on declining pine health; A good example of adjusting the plan. The adjacent area where pine overstory removed 2-3 years ago has excellent hardwood regeneration present. Can be cut after September (moist site).

Unimproved Road, Brookfield Unit

Walked, no maintenance concerns. Discussed issues of public access, the need for case-by-case research for the legal status of each road.

Stand G-23, Brookfield Unit

Marked conifer plantation; all harvest roads designated by foresters; careful marking.

Stands B86-87

Marked intermediate thinning of an even-aged Maple-Beech-Cherry stand. Cut in winter, removing timber, pulpwood, and firewood. Residual stand healthy, vigorous trees, little residual stand damage; slash well-distributed throughout site. Felling of 1,115 other trees required as part of this sale.

Stand E-87 (B-87?)

Non-commercial thinning (TSI) of a white pine stand done by loggers as part of sale conditions another sale. Effective release was accomplished.

Cherry Ridge Camping Area, Brookfield Unit

Foresters developed this small camping loop based on public input during unit management planning process. There were other larger campgrounds set up for horse-camping; this site allows campers without horses a location without occupying scarce horse-camping sites.

Stands E-12, 21, Brookfield Unit

Partial harvest of hardwood stand (maple, cherry, ash, birch) on slopes; stopped work due to weather; site was stabilized. Portions at hilltop treated with herbicides (backpack mist-sprayer) to control hay-scented fern, beech, striped maple, and ironwood. Contract includes chemical best management practices requirements. The treatment appears to have been effective without a “total kill” effect.

Brookfield Auto Tour Stop #10

Excellent example of public education in a unit with heavy recreational use and a strong forest management program.

Stands A-26,27

A very nicely done, roadside harvest in planted stands with some hardwoods. No skidding was allowed; instead cut with processor and wood was forwarded. Skilful incorporation of aesthetic management techniques into commercial harvest was very evident here.

Thursday, May 17 – Cortland, NY, Region 7

Opening meeting – Introductions of staff, presentation of regional statistics, review site visit itinerary. Discussed herbicide usage, conceptual approval form, draft special riparian management zone guidelines, GIS data layers, training, and implementation of UMPs.

Cortland RA16, Stand A21

16 acres, local sale, firewood contract. Cut winter 05/cleaned up June 06. Good stream crossing (plastic culvert pipe laid in streambed with logs alongside, frozen in. Removed, looked very good. Used cable skidder and forwarder. Waterbarred skid trail, left much CWP on-site.

Cortland 16, Stand A10

8 acres, revenue sale. Left much CWD on site, some residual damage.

Cortland 16, stands B6, B7

Single tree + group selection. High site quality, high quality black cherry on site. Landing was eroded from excessive run-off from above (not a result of logging, just sheet erosion from heavy rains). Used large rocks rather than gates to prevent access. Skids well water-barred, much CWD left distributed across sites as logs and snags, plus left much residual hemlock as conifer for wildlife. Some felling damage noted on residuals.

Cortland 8, Stands A6-A9

59 acres in aggregate. Red pine/Norway spruce. Marked to retain spruce, no harvest. Will use previous landings. Basic reason for this visit was to review protection offered hawk nests (accipiters, mostly Cooper’s hawks). Mark nest trees with 2 painted pink stripes, mark circle radius 150-300 feet for a no cut zone, trees in circle representing no-cut zone painted red.

Labrador Hollow Unique Area (Stand A30)/Tinker Falls (Stand A34)

211 acres visited, site visit to view Unique Area management. Tinker Falls using grant for handicapped access (special trail and parking area) to falls area. Labrador Hollow managed for unique ecosystem (narrow valley, steep hillsides, glacial “through-valley” northern hardwood characteristic of northern forest -Adirondack area). Boardwalk area built to provide good access to area for viewing of wetland, signed. Several invasive exotic plants (swallowwort, phragmites, purple loosestrife, Japanese knotweed) treated with IPM (hand pulling/clipping followed with spot application of approved chemicals).

Morgan Hill Farm

60+ acres; intermediate thinning, conversion from red pine plantation to hardwood. Harvester & forwarder. Much recreational use, highly travelled road.

Rough Grouse Society

~3 acres old apple orchards, Adopt a Natural Resource Program with Ruffed Grouse Society, cut out competing hardwoods, girdle some, prune apple trees. Work done by unpaid volunteers ~ one day/year.

Griggs Gulf State Forest (Cortland Reforestation Area 11) Stands C-20, 21

Revenue Sale Active: Marked and sold, was started but stopped due to wet ground conditions: dense red pine stand 70-75 years old first thinning, delay in thinning led to low vigor trees and poor health. This resulted in reduced options for the stand. Prescription was to start regenerating stand as residual will not hold together. Residual basal area 120; high partially for esthetics and to protect hydrology. May not enter again – may let large amount of good red pine fall apart, or may enter again. Some concerns about rutting and inadequate water bars; will be resolved when harvest continues.

Stop 2: Public Access Road, Broome-Tioga SF

Road maintenance; including ditch cutting and reshaping

Stop 3: Beaver Dam State Forest Public Forest Access Road (PFAR)

Reviewed culvert replacement at the site of a braided stream, 3 large culverts in streams that are 100' apart. First culvert, discussed issue of adjusting culvert depth to match modern practices; culvert was not reset, outlet was strengthened. At easternmost culvert, both ditches empty directly into stream. One could have been diverted into vegetation with minimal effort.

Norway Spruce Plantation Beaver Dam State Forest BT2-B3

Marked Norway spruce plantation, light improvement thinning, mostly from below; trying to carry spruce as long as possible. Some spruce seedlings were found; under dense canopy these are small, spindly; at roadside edge of stand they are dense, robust; none were seen roadside adjacent to stand under hardwood canopy – appear to not be invasive into hardwood stands.

Turkey Hill State Forest (Tioga 5) Stands A-25, A-27

157 Acre Revenue Sale (X006472), marked and sold but not started: Rx: preharvest herbicide to kill fern and all beech taller than 2 feet; oak section shelterwood establishment harvest; mixed hardwood/northern hardwood section: patch cuts. Confirmed marking consistent with current silvicultural knowledge for oak and for mixed hardwood regeneration goals. Also confirmed that the herbicide application plan meets certification requirements; was reviewed through a “State Environmental Quality Review (SEQR)” and had a negative declaration

Friday, May 18 – Bath, NY, Region 8

Opening meeting – Introductions of staff, presentation of regional statistics, review site visit itinerary. Discussed how work priorities are determined in matrix organization, wood markets, plantation management, and stand inventory system.

Schylar Reforestation Area #1 (Gundry Hill State Forest)

Site 1: 15 year-old clearcut to establish early successional habitat. Designated grouse hunting area. Some hardwood retention within unit. Very good hardwood regeneration consisting of oak, ash, hard

maple. Stand inventoried less than 10 years ago.

Site 2: Gas pipeline site. Foresters worked with oil company to pile slash created by opening and to site prep the area to establish permanent open grass habitat adjacent to larger open areas associated with gas pipelines.

Hardwood clearcut near well pad completed 10 years ago

Dense regeneration with robust oak component.

Red Pine Liquidation Sale #1

20 acre Red pine sanitation/salvage of red pine plantation. Stand and had never been thinned and live crown ratio was approaching 10%. Pine not suited to shallow soils and had become stagnate. Ips beetle had attached stand causing extreme mortality. Isolated hardwood retained where possible. Fairly deep rutting on slope within unit. Signs were placed along designated trail through unit to explain harvesting to trail users. Extensive discussions on hardwood conversions and soil compaction.

Hardwood Harvest Sale #2

Single tree selection system harvest of northern hardwood stand. Good residual stand structure retained. Removed approximately 20% of pre-harvest basal area. Culvert and pipes installed at stream crossings. Culvert not placed deeply enough to prevent down cutting. Logging contractor had crossed seep area causing deep rutting through riparian area.

Red Pine Thinning Sale #3

Pine plantation originally planted in 1960. Sale designed to promote growth on residual pine. Removed approximately 40% of pre-harvest basal area. Stand had been previously thinned by inmate crew at age 20. Current live crown ration 25-30% (foresters indicated that ideal LCR is 40% to respond to thinning). Thinning done in rows and with additional selection of individual trees in adjacent rows. Cut designed modified in response to risk of windthrow. Heavy soil compaction caused by operating forwarder on wet soil. Deep rutting also present.

Shelterwood Cut #4

Older conifer plantation thinned 15 years ago with intention of creating hardwood regeneration. Heavy cutting created wide residual spacing. Overstory composed of mixed conifer species had responded well to heavy thinning. Nice LCR on overstory. Good mixture of hardwood understory.

Shelterwood Cut #5

Younger stand of conifer with 50% of trees removed in 2002. Area not exposed to heavy winds creates lower risk of windthrow and heavy thinning. Very good hardwood regeneration and mixture of species composition. Overstory conifer 30% LCR. Discussed shelterwood removal, pine thinning, and other even-aged silvicultural techniques. Catlin State Forest, Stand A180

~ 1 acre well pad site exhibiting impact of oil/gas exploration. Berm built around pad site, pad grassed, fenced, well-maintained.

Catlin State Forest, Stand A22

35 acre maturing red pine plantation with hardwood advance regeneration. No current treatment, past treatment = 3rd row thinning.

Catlin State Forest, Stand A11.

41 acres. Small sawtimber northern hardwood (sugar maple, black sherry, red maple, basswood) stand, crop tree thinning/group selection, hand felling, cable skidding. Took 3 years to get cut, contractor

slow, last year excessive rutting, needs more waterbars. Excessive residual damage, pulled sale from contractor. Still needs mitigation. Was good distribution of slash across site.

Catlin State Forest/Maple Hill RA2

80 acres; 10 acre clearcut aspen for ruffed grouse, 70 acres grassland cool season grasses, lime and mow to retain for grouse/turkey. Landing area clean.

Texas Hollow State Forest, Schuyler3

$\Sigma=937$ acres. Finger Lakes Trail segment, two large protected bogs. Basically walked area to view bogs/protection.

June 1, 2007

Rush Oak Opening Unique Area

$\Sigma=229$ acres. Retain globally-rare plant community (dry oak savanna/prairie) with controlled burning ~ 20 acres per burn and limited use of herbicides Walked site to view plant communities, affects of controlled burns. Prior to treatment (burning) site was reverting to mixed oak/deciduous colonizing species (red maple, grey dogwood, honeysuckle, swallowwort & garlic mustard (exotic invasives). Rare plant (goosefoot corn salad) protected.



Section D
NSF-ISR Corrective Action Request (CAR) form(s)

Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u>	Date: <u>May 20, 2007</u> FRS # <u>6L741</u>
Auditor: <u>Mike Ferrucci</u>	CAR Number: <u>NYSLM-2007-01</u>
Location of Finding: <u>Readiness Review, Albany; revised</u>	Previous CAR Number/Date: _____
Discussed with: <u>Central Office Staff;</u>	Nonconformance Type (underline): Major <u>Minor</u>

AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 1.1.1: “A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including: ...f. recommended sustainable harvest levels; and g. a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).”

Description: Although most of the required issues are covered by other types of analysis, Unit Management Plans are not complete and there is not a clear schedule with resources identified to complete these plans in a timely manner. These plans are being used to update the allowable harvest levels consistent with the current ecosystem management approach; otherwise evidence was not presented that the 1991 AAC determination is still reliable when considering areas lacking UMPs.

1) ROOT CAUSE ANALYSIS BY DEC: Management planning provides public input, State Environmental Quality Review (SEQR), budgeting, management strategies and scheduling activities all rolled into a Unit Management Plan (UMP). With existing staffing levels we have completed final UMPs for only 41 of 139 management units and only 28 of these UMPs have been completed since 1995.

Forest Inventory provides information on forest: health, structure, biodiversity and management needs. Inventory data also provides the “foundation” for management plans. This data must be current, which means inventory must be completed on a similar cycle to management planning. This goal is further challenged by our need to collect more comprehensive inventory data to practice ecosystem management and sustainable forestry on State Forests.

2) CORRECTIVE ACTION BY DEC: The Bureau intends to streamline management planning, based on methods recommended in the recent Green Certification Audit and by exploring the methods used in neighboring States. Even with these radical changes, the time spent on management planning will have to be substantially increased to complete plans on a fifteen year cycle (from the present rate which would translate into a cycle in excess of forty years).

The Bureau recognizes that the combination of streamlining the management planning and increasing scheduled updates will require an additional amount of permanent Foresters and other personnel. A number of briefings have been submitted to the Department Executives requesting support for new positions. In the mean time, contacts have been made with NY State Habitat and Heritage Bureaus to begin developing a *Regional Plan* format incorporating Eco-zones and Watersheds. This will create a landscape-level approach to management with an emphasis on ecosystems, species and habitat.

Expected completion of a draft pilot *Regional Plan* is Fall 2008.

3) PREVENTIVE ACTION BY DEC: We have conducted an analysis of additional staff resources needed to address this Non-conformance. The conclusion indicated that an additional 13 full time positions would be needed to facilitate management planning goals of reducing the 40 year cycle to 15 years and an additional 7 positions to reduce the inventory cycle from the average current rate of an 18 year cycle (over the past 5 years), to at least a 15 year cycle. These positions would be filled with Senior Foresters and a selected number of Senior Biologist/Ecologists and Natural Resource Planners.

AUDITOR REVIEW OF COMPANY’S PLAN:

The proposed plan is comprehensive and acceptable. Progress will be reviewed in the next surveillance audit.

STATUS: Open AUDITOR/DATE: Mike Ferrucci, October 25, 2007

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

STATUS LEGEND:

OPEN = CA Plan Accepted **CLOSED** = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation rejected

Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u>	Date: <u>April 27, 2007</u> FRS # <u>6L741</u>
Auditor: <u>Mike Ferrucci</u>	CAR Number: <u>NYSLM-2007-02</u>
Location of Finding: <u>Readiness Review, Albany;</u>	Previous CAR Number/Date: <u>NYSLM-2007-03 Minor</u>
Discussed with: <u>Central Office Staff;</u>	Nonconformance Type (underline): <u>Major</u> Minor

AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 10.1.1: “Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters.”

Description: No formal statement of commitment has been circulated throughout the organization.

SFI Licensee agreement must be completed before a recommendation for certification can be made by the NSF Lead Auditor.

Note: formerly NYSLM-2007-03 Minor CAR Readiness Review, Albany

1) ROOT CAUSE ANALYSIS BY DEC: A formal process was never developed to show Department commitment to Green Certification with particular commitment to the 2005-2009 Sustainable Forestry Initiative® and Forest Stewardship Council standards. A number of meetings were set up during the spring 2007 to inform and update the new Department Executives with the NY Bureau of State Land Managements (Bureau) request to seek renewed Green Certification.

Initial assurance was granted to the Bureau when authorization was given to enter into contract with NSF-ISR and SCS to complete a certification audit.

2) CORRECTIVE ACTION BY DEC: A memorandum from the Department Commissioner, Alexander B. Grannis, was sent to Regional Directors, Regional Foresters, Supervising Foresters and Foresters assigned to the Bureau of State Land Management stating the NYS Department of Environmental Conservation commitment to green certification standards. A signed copy of this memorandum will be shared with the SFI Audit team.

3) PREVENTIVE ACTION BY DEC: Press releases, displays, tags, and other promotional material will be developed and distributed to other Department staff, the forest industry, and many other public entities. This promotional material will incorporate the “marks” of both certifying organizations.

AUDITOR REVIEW OF COMPANY’S PLAN:

The Major CARs must be closed before certification can be finalized. The proposed plan to secure the commitment after review of all SFI and FCS non-conformances and funding/budget issues is acceptable. Evidence of completion of corrective actions will be reviewed when they are provided.

STATUS: Open

AUDITOR/DATE: Mike Ferrucci, October 25, 2007

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

Reviewed memo “The NYS Department of Environmental Conservation Commitment to Green Certification Standards” The

STATUS: Closed

AUDITOR/DATE: Mike Ferrucci September 15, 2007

STATUS LEGEND:

OPEN = CA Plan Accepted

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Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u>	Date: <u>April 27, 2007</u> FRS # <u>6L741</u>
Auditor: <u>Mike Ferrucci</u>	CAR Number: <u>NY-SLM-2007-03</u>
Location of Finding: <u>Certification Audit</u>	Previous CAR Number/Date: <u>NY-SLM-2007-02</u>
Discussed with: <u>Central Office Staff</u>	Nonconformance Type (underline): <u>Major</u> Minor

AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard®, Indicator 13.1.3: “Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.”

Also Indicator 10.1.2: “Assignment and understanding of roles and responsibilities for achieving SFI Standard objectives.”

Description: Major Non-conformance NYSLM-2007-02: An SFI management review has not been documented, and has not included management with direct line authority to determine changes and improvements. Evidence was not provided that the managers with direct line authority to implement corrective actions have been included within the SFI program (roles and responsibilities are not clear).

Note: formerly NYSLM-2007-02 Minor CAR Readiness Review, Albany

1) ROOT CAUSE ANALYSIS BY DEC: Due to the matrix system established by the Department, direct line of authority and responsibility has been difficult to enforce in a clear and concise way. Green certification has added additional responsibility and time requirements to already limited staffing within the Bureau. Communication of certification standards, responsibilities and training has been limited to available time from the staff in Central Office.

2) CORRECTIVE ACTION BY DEC: As of July 26, 2007 the Bureau has been able to create and fill a “Green Certification Coordinator” (GC Coordinator) position within Central Office to handle the day-to-day administration of the certification Standards. The GC Coordinator has been tasked with overseeing the development of a corrective action plan to achieve and maintain green certification on the Bureau’s State Forests. The GC Coordinator will also work with the Regions through the Regional and Supervising Foresters to ensure all Senior Foresters managing the State Forests do so in accordance to the certification Standards.

On October 16 the GC Coordinator will present the Certification Audit findings and present the Bureaus responses. During this presentation the GC Coordinator will also address roles and responsibilities within the Bureau and the Regions as to how Corrective Action Plans (CAPs) will be carried out in order to maintain compliance with the Green Certification Standards.

3) PREVENTIVE ACTION BY DEC: The GC Coordinator will participate in the existing bi-monthly Central Office Division of Lands and Forests conference calls with the Regions and will establish annual green certification conference calls with the Regional and Supervising Foresters to review issues and opportunities for improvement when applying the Standards to State Forest management. The Green Certification Standards will be incorporated into an Annual Region Program Review to determine changes and improvements necessary to conform to future sustainability through the management of State Forests. The GC Coordinator will create an quarterly report of the Bureaus achievements meeting the standards of sustainable management, opportunities for improvement, and any conformance issues. This report will be provided to Regional Directors, Robert Davies, State Forester/Division Director, Chris Amato, Assistant Commissioner, and Stuart Gruskin, Executive Deputy Commissioner, to discuss strategies to mitigate non-conformances.

AUDITOR REVIEW OF COMPANY’S PLAN:

The proposed plan is comprehensive and acceptable. Progress will be reviewed as evidence occurs. The Major CARs must be closed before certification can be finalized.

STATUS: Open

AUDITOR/DATE: Mike Ferrucci, October 25, 2007

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

Evidence of management reviews was provided in the form of post-hoc notes. The key meeting was Wednesday, October 31, 2007 and involved the Deputy Commissioner and the State Forester. These are sufficient to close the Major. Will open a Minor Non-conformance because of the long time delays involved, the narrow focus of the review, and concerns that this activity will not be continued. The Minor Non-conformance will be reviewed during the 2008 surveillance audit, scheduled during the first half of 2008.

STATUS: Closed, changed to Minor Non-conformance NY-SLM-2007-09 AUDITOR/DATE: Mike Ferrucci, Nov. 25, 2007

STATUS LEGEND:

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REJECTED = C/A Plan or Implementation rejected

Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u>	Date: <u>April 27, 2007</u> FRS # <u>6L741</u>
Auditor: <u>Mike Ferrucci</u>	CAR Number: <u>NYSLM-2007-04</u>
Location of Finding: <u>Readiness Review, Albany</u>	Previous CAR Number/Date: _____
Discussed with: <u>Central Office Staff</u>	Nonconformance Type (underline): Major <u>Minor</u>

AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 10.1.4: “Contractor education and training sufficient to their roles and responsibilities.”

Description: There are no formal training requirements for loggers.

1) ROOT CAUSE ANALYSIS BY DEC: Although the Bureau encourages logger training, no requirements were enforced on contractors or their employees. The Bureau felt requiring specific logger training may hinder staffs’ ability to complete contract deliverables. Additionally, prior to the 1990s there was no formal logger training established in New York.

2) CORRECTIVE ACTION BY DEC: The Bureau will develop language for use on local (\$500 to \$10,000) and revenue (over \$10,000) sales contracts that will require contractors and their employees to be trained at a pre-determined level commensurate with their job duties and responsibilities. This contract language will go into effect on contracts signed after January 1, 2010.

3) PREVENTIVE ACTION BY DEC: The Bureau will begin promoting the New York Logger Training (NYLT) - Trained Logger Certification Program (TLC) before January 1, 2008 by sharing future training courses with contractors through direct mailings, bid notices, web links or verbal notification. Components of the NYLT TLC program include three core courses: 1) *Game of Logging® Level 1* (or equivalent chainsaw safety course), 2) *Forest Ecology and Silviculture* (including Best Management Practices [BMPs] for timber harvesting), 3) current first aid and CPR certification and additional continuing educational workshops. The Bureau will take every advantage possible to notify and assist contractors and their employees to accomplish TLC or its components by 2010. Department forestry staff may assist with the training courses to facilitate their availability in areas where needed. NYLT maintains an extensive database showing participation in the TLC program. Contractors and their employees who participate in the TLC program will have certificates and other documents supplied by NYLT in addition to a listing on the NYLT TLC database. The Bureau will have access to the TLC database to verify contractor participation and courses completed. Further reference material can be found at www.nyloggertraining.org

AUDITOR REVIEW OF COMPANY’S PLAN:

The proposed plan does provide for training requirements prior to 1-1-2010 by incorporating them into all contracts signed after 1-1-08 but allowing the contractors until 1-1-2010 to get fully trained. New York State SFI’s logger training program will therefore have time to gear up and offer training to many additional loggers. It is hoped that many loggers on state forests will begin to accumulate training sooner, but with this approach ALL contractors will ultimately be trained.

STATUS: Open AUDITOR/DATE: Mike Ferrucci November 5, 2007

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

STATUS LEGEND:

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Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Lowville Sub-region</u> Discussed with: <u>Tom Wolfe, Regional employees;</u>	Date: <u>May 15, 2007</u> FRS # <u>6L741</u> CAR Number: <u>NYSLM-2007-05</u> Previous CAR Number/Date: _____ Nonconformance Type (underline): Major <u>Minor</u>
<p>AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 2.3.4 “Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, ...)”; Indicator 2.3.2 “Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.” and Indicator 2.3.6 “Criteria that address harvesting and site preparation to protect soil productivity”</p> <p>Description: <u>At five sites visited by the team, deep rutting and extensive soil compaction were observed. Modest to severe rutting was found on sites in nearly every office (sub-region) visited. Rutting criteria (see Indicator 2.3.6) either do not exist, are not enforced consistently, or are not accepted by field foresters. Processes to identify soils vulnerable to compaction and use of avoidance methods (see Indicator 2.3.6) may be inadequate.</u></p>	
<p>1) ROOT CAUSE ANALYSIS BY DEC: <u>No specific guidance has been developed to direct field staff on protecting soil compaction and rutting during timber harvesting on State Land. There is no specific rutting or soil compaction guidance in the NY State Forestry Best Management Practices for Water Quality – BMP Field Guide.</u></p> <p>2) CORRECTIVE ACTION BY DEC: <u>The Bureau will develop “Rutting Guidelines” to be used by field foresters to assess the likelihood of soil compaction during timber harvesting. The Bureau will also develop contractual language to be used in the “Notice of Sale” and “Request For Conceptual Approval” forms. “Rutting Guidelines” and contractual language will be finalized and distributed to Regional field staff by spring 2008.</u></p> <p>3) PREVENTIVE ACTION BY DEC: <u>Components of staff BMP training will contribute toward addressing soils compaction and protecting soil productivity. Additionally, the Bureaus DEC division of Lands and Forests Management Rules for Establishment of Special Management Zones on State Forests will restrict equipment from sensitive features such as wetlands, vernal pools, and riparian areas.</u></p>	
<p>AUDITOR REVIEW OF COMPANY’S PLAN: <u>The proposed plan is comprehensive and acceptable. Progress will be reviewed in the next surveillance audit.</u> STATUS: <u>Open</u> AUDITOR/DATE: <u>Mike Ferrucci, October 25, 2007</u></p> <p>AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION: _____ _____ _____</p> <p>STATUS: _____ AUDITOR/DATE: _____</p>	

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Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u>	Date: <u>May 17, 2007</u> FRS # <u>6L741</u>
Auditor: <u>Mike Ferrucci</u>	CAR Number: <u>NYSLM-2007-06</u>
Location of Finding: _____	Previous CAR Number/Date: <u>N.A.</u>
Discussed with: <u>David Forness, Cortland Office foresters;</u>	Nonconformance Type (underline): Major <u>Minor</u>

AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard®
 Indicator 3.1.1: “Program to implement state or provincial equivalent BMPs during all phases of management activities.”
 Indicator 3.1.4: “Monitoring of overall BMP implementation.”

Description: At a recently repaired stream crossing on the Public Forest Access Road in Broome Tioga 2 (Beaverdam Forest) the outlet of the repaired culvert crossing of the first and largest stream is perched above the pond below the road forming a barrier to the passage of aquatic organisms. NY State Best Management Practices for Water Quality state “avoid disrupting migration or movement of aquatic organisms” (page 38) and “culverts should not cause damming or pooling” (page 43). BMP monitoring does not cover roads or local sales.

- 1) **ROOT CAUSE ANALYSIS BY DEC:** Limited funds and decreasing staff levels while increasing forest ownership acreage has created a dilemma with the overall management of State Forests. In particular, no BMP monitoring guidance was developed to oversee the use, appropriateness, and adequacy of BMP installation.
- 2) **CORRECTIVE ACTION BY DEC:** The Bureau will consider adopting the USDA Forest Service developed *BMP Protocol*. “The specific purpose of the BMP protocol is to create an economical, standardized, and repeatable BMP monitoring process that is completely automated, from data gathering through report generation, in order to provide measured data, ease of use, and compatibility with State BMP programs.” (*Best Management Practice (BMP) Manual – Field Guide: Monitoring, Implementation, and Effectiveness for Protection of Water Resources*, NA-FR-02-06, March 2007). Adoption may occur as early as Fall 2008.
- 3) **PREVENTIVE ACTION BY DEC:** The Bureau will develop methodology and guidance for staff (Foresters and/or techs) to do periodic monitoring of the access system used during harvesting operations. Data collected from the protocol will be used in the annual reports to auditing entities to demonstrate effective applications and corrective actions where issues arise.

AUDITOR REVIEW OF COMPANY’S PLAN:

It would not be reasonable to require the stream crossing to be reworked. The proposed plan is acceptable. Progress will be reviewed in the next surveillance audit; the audit team will enquire as to the monitoring protocol adopted. Training described in SFI CAR NYSLM-2007-08 is likely to further strengthen the BMP program.

STATUS: Open AUDITOR/DATE: Mike Ferrucci, October 25, 2007

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

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Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: _____ Discussed with: _____	Date: <u>May 20, 2007</u> FRS # <u>6L741</u> CAR Number: <u>NYSLM-2007-07</u> Previous CAR Number/Date: _____ Nonconformance Type (underline): Major <u>Minor</u>
<p>AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 2.4.2: “Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.”</p> <p>Description: Overstocking due to delayed thinning has led to diminished vigor of planted conifers and some subsequent insect problems.</p>	
<p>1) ROOT CAUSE ANALYSIS BY DEC: <u>Since 1995, staffing in the Division of Lands and Forests, Bureau of State Land Management (Bureau) has been reduced by over 28% while the acreage the Bureau administers has increased more than 80%. This will be further compounded by an additional 800,000 acres of Conservation Easements to be managed by the Bureau.</u></p> <p><u>Loss of staff and funding and continued growth and site recovery has resulted in current conditions on many of these plantations with diminished vigor and insect problems. Periodic thinning, with a goal of improving growth and health of these stands was limited to minor funding availability and adjacent harvesting operations over the years. Recent experience has demonstrated that many of the plantation stands in certain regions have grown to a point where thinning may result in significant blow-down in the residual trees. However, the majority of these plantation stands across the State have not had the appropriate level of management with many exceeding their scheduled harvest due to limited staffing.</u></p> <p>2) CORRECTIVE ACTION BY DEC: <u>The Bureau will continue to incorporate planning and contract work to address appropriate thinning and harvesting regimes to improve growth, health or conversion to natural regeneration. The Bureau has also made requests at the executive level to address staffing levels to handle the management of State Forests. The Bureau should know by Fall 2008 whether funding and items will be created to increase regional staffing levels.</u></p> <p>3) PREVENTIVE ACTION BY DEC: <u>To be determined after Fall 2008.</u></p>	
<p>AUDITOR REVIEW OF COMPANY’S PLAN: The proposed plan regarding corrective actions is acceptable. Progress will be reviewed in the next surveillance audit. Preventive actions are likely to be the same as corrective action; further discussion is warranted during the next Surveillance Audit. STATUS: <u>Open</u> AUDITOR/DATE: <u>Mike Ferrucci, October 25, 2007</u></p> <p>AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION: _____ _____ _____</p> <p>STATUS: _____ AUDITOR/DATE: _____</p>	

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Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u>	Date: <u>April 27, 2007</u> FRS # <u>6L741</u>
Auditor: <u>Mike Ferrucci</u>	CAR Number: <u>NYSLM-2007-08</u>
Location of Finding: <u>Certification Audit</u>	Previous CAR Number/Date: _____
Discussed with: <u>Rob Davies, Tom Wolfe, regional staff</u>	Nonconformance Type (underline): Major <u>Minor</u>

AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 10.1.3: “Staff education and training sufficient to their roles and responsibilities.”

Description: Foresters are quite competent and many have maintained current with science and practice, which are rapidly expanding. However foresters are not consistently trained in or knowledgeable about topics within their full scope of roles and responsibilities under the ecosystem management approach adopted by the Bureau of State Land Management. Further, there is no BMP training for road construction/ road grading staff.

1) ROOT CAUSE ANALYSIS BY DEC: Although the Bureau supports staff training in relevant topics, no formal process has been developed to arrange for “in-house” staff training.

2) CORRECTIVE ACTION BY DEC: The Bureau will set up a joint training workshop for both Forestry staff responsible for State Forests and the Operations Crews who do the road construction and maintenance. The (general) theme of this training will be *Best Management Practices on State Forests*. In order for participants to get the most from the training they will assist with the development of the subject matter. The workshop will be a full-day class. The Bureau will offer this workshop at least twice throughout the State for sake of staff travel. Field portions of this workshop can be an option but may be dependent on instructor, subject matter, and workshop location. The Bureau will expect all Foresters involved with State Forest Management to attend.

Potential Topics may include: culvert design, installation and maintenance considering aquatic wildlife; designing access considering recreation and public use; knowing when (and how) to close a road; minimizing maintenance problems; roads and wildlife; cutting edge BMPs for road design; road design to minimize routine maintenance; dealing with storm damage; calculating culvert size based on watershed; limiting introduction of invasive species on construction jobs; proper installation and use of sediment control devices (i.e. silt fence, straw bales); access across a buffer.

This is an incomplete list of topics. Depending on the topics, the Bureau may be able to cover more than one topic at the workshop. This initial workshop will be offered before summer 2008.

3) PREVENTIVE ACTION BY DEC: The Bureau recognizes the value of Forestry staff considering an ecosystem management approach to forest management on State Forests. The Green Certification Coordinator (GC Coordinator) and four other regional Forestry staff will be attending the *Ecological Forestry Workshop* offered in Wisconsin October 10th and 11th, 2007. This workshop will present core principles of natural disturbance and natural development-based silviculture, and matrix management paradigms, through classroom lecture, discussion, and field visits to innovative projects that implement these principles. The Bureau will offer this or a similar workshop in New York for the remaining Forestry staff by Winter 2008.

AUDITOR REVIEW OF COMPANY’S PLAN:

The proposed plan is comprehensive and acceptable. Progress will be reviewed in the next surveillance audit.

STATUS: Open

AUDITOR/DATE: Mike Ferrucci, October 25, 2007

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

STATUS LEGEND:

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Corrective and Preventive Action Request (CAR)

Company/Location: <u>NY Bureau of State Land Management</u>	Date: <u>November 27, 2007</u> FRS # <u>6L741</u>
Auditor: <u>Mike Ferrucci</u>	CAR Number: <u>NYSLM-2007-09</u>
Location of Finding: <u>Certification Audit</u>	Previous CAR Number/Date: <u>NY-SLM-2007-03</u>
Discussed with: <u>Justin Perry</u>	Nonconformance Type (underline): Major <u>Minor</u>

AUDITOR FINDING: Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard® Indicator 13.1.3: “Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.”

Description: The management review system has not been in place long enough to ensure that all SFI issues are covered in the review.

1) ROOT CAUSE ANALYSIS BY DEC: Consistent, annual communication of certification standards, and responsibilities has not been formally established until the NY Bureau of State Land Management State Forests becomes certified.

2) CORRECTIVE ACTION BY DEC: As of July 26, 2007 the Bureau has been able to create and fill a “Green Certification Coordinator” (GC Coordinator) position within Central Office to handle the day-to-day administration of the certification Standards. The GC Coordinator has been tasked with overseeing the development of a corrective action plan to achieve and maintain green certification on the Bureau’s State Forests. The GC Coordinator will also work with the Regions through the Regional and Supervising Foresters to ensure all Senior Foresters managing the State Forests do so in accordance to the certification Standards.

GC Coordinator will present the Certification Audit findings and present the Bureaus responses, current issues and future challenges to the Division Director, Robert Davies, bi-annually. These findings will also address roles and responsibilities within the Bureau and the Regions as to how Corrective Action Plans (CAPs) will be carried out in order to maintain compliance with the Green Certification Standards. At a minimum, the Division Director will meet with executive (Chris Amato, Assistant Commissioner, and Stuart Gruskin, Executive Deputy Commissioner) annually (prior to each annual audit) to keep abreast of any changes, issues and challenges.

3) PREVENTIVE ACTION BY DEC: The GC Coordinator will participate in the existing bi-monthly Central Office Division of Lands and Forests conference calls with the Regions and will establish annual green certification conference calls with the Regional and Supervising Foresters to review issues and opportunities for improvement when applying the Standards to State Forest management. The Green Certification Standards will be incorporated into an Annual Region Work Plan and Annual Region Program Review to determine changes and improvements necessary to conform to future sustainability through the management of State Forests. The GC Coordinator will create a bi-annual report of the Bureaus achievements meeting the standards of sustainable management, opportunities for improvement, and any conformance issues. This report will be provided to Regional Directors, Robert Davies, State Forester/Division Director, Chris Amato, Assistant Commissioner, and Stuart Gruskin, Executive Deputy Commissioner, to discuss strategies to mitigate non-conformances prior to each annual audit.

AUDITOR REVIEW OF COMPANY’S PLAN:

This plan is responsive to the issues raised during the audit and, if fully implemented, should result in conformance. Implementation will be assessed during the next, and subsequent, audits.

STATUS: Open AUDITOR/DATE: Mike Ferrucci, 12-06-07

AUDITOR REVIEW OF COMPANY’S COMPLETED ACTION:

STATUS: _____ AUDITOR/DATE: _____

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