

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

State of New York, Bureau of State Land Management

SCS-FM/COC-00104N

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CERTIFIED	EXPIRATION
1/28/2018	1/27/2023

DATE OF FIELD EVALUATION
10-12 September 2019
DATE OF LAST UPDATE
22/Oct/2019

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Foreword

Cycle in annual surveillance evaluations				
<input type="checkbox"/> 1 st annual evaluation	<input checked="" type="checkbox"/> 2 nd annual evaluation	<input type="checkbox"/> 3 rd annual evaluation	<input type="checkbox"/> 4 th annual evaluation	<input type="checkbox"/> Other (expansion of scope, Major CAR audit, special audit, etc.):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
New York State (NYS), Department of Environmental Conservation (DEC or NYDEC), Bureau of Forest Resource Management (BFRM).				

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

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

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

Organization of the Report

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

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

Auditor name:	Beth Jacquain	Auditor role:	FSC Lead Auditor
Qualifications:	Beth is a Senior Certification Forester with SCS Global Services. Master of Science in Forest Biology/Ecology from Auburn University and Bachelor of Science in Forest Management from Michigan State University. Beth has 20+ years' experience in forestry including public land management, private consulting, and private corporate forest management working with landowners and harvest crews. Qualified ANSI RAB accredited ISO 14001 EMS Lead Auditor and FSC Lead Auditor for Forest Management/Chain of Custody. Audited and led FSC evaluations, harvest and logging operations certification audits; and joint/combined PEFC (AFS, RW, SFI, ATFS) audits. An 11-year member of the Forest Guild, 21-year adjunct-Faculty with Itasca Community College, Natural Resources Department. Member 20+ years Society of American Foresters, served MN State Chair 2010 and multiple committees, state and national, throughout. Beth's experience is in forest management and ecology; ecosystem silviculture; the use of silviculture towards meeting strategic and tactical goals; nursery/tree regeneration; forest timber quality improvement (sawmill/veneer), CSA/FIA Phase II forest inventory; conifer thinning operations, pine restoration, wildfire fighting, and fire ecology in conifer dominated systems. Beth has conducted evaluations throughout the United States, and in Australia, New Zealand, Fiji Islands (Viti levu), and in Slovakia. Beth has experience in forest ecology and management in the Midwest, Pacific Northwest, and the southeastern US.		
Auditor name:	Keri Yankus	Auditor role:	FSC Auditor
Qualifications:	Keri Yankus has over 20 plus years of experience in the forestry industry. She has a B.S. in Forest Management and Recreation and Park Management from the University of Maine. She has worked as an employee for the following: US Army Corps of Engineers, MA, West Virginia Division of Forestry, National Park Service (South Dakota and Pennsylvania), Bureau of Land Management (31 States East of MS and Washington D.C.), NRCS (Michigan and Ohio), USDA Wildlife Services and joint with the Marines, Airforce, Navy and Coast Guard, DOD (North Carolina and New Hampshire), US Forest Service in Michigan and West Virginia. She worked for private industry as forester with Weyerhaeuser and Bioforest Technologies in USA and Canada. Keri holds current professional forestry licenses for West Virginia, and North Carolina, and is an SAF Certified Forester and an active SAF member. She is currently active GSD SAF and is serving on the board for NH Project Learning Tree. She has worked for NSF as an auditor since 2000. She also holds her certification as Exemplar Global Lead Auditor. She has conducted numerous EMS, SFI (FM, FS, CS and COC/PEFC), TLMI & ATFS audits.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	3
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B. Number of auditors participating in on-site evaluation:	2
C. Number of days spent by any technical experts (in addition to amount in line A):	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up:	2
E. Total number of person days used in evaluation:	8

1.3 Standards Used

All standards used are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS's Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS's COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC-US Forest Management, 2010.
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V7-0
	<input type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

Tuesday, 10 September 2019: Region 3	
FMU/ location/ sites visited	Activities/ notes
New Palz Office	<p>Opening Meeting: Introductions, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, client update.</p> <ul style="list-style-type: none"> ■ Chemical Storage inspection (separate building) - Checked for containers being labels, labels for stored forestry chemicals and SDSs. No issues. ■ GIS dbase, feature class for RTE, HCVF - Confirmed data records for RTE (notebook) ■ DMM Pesticide control specialist - Rules, regulations Castle Rock ■ Training records for Forester conducting sprays - Pesticides license
TRP #11807 Central Hudson Gas and Electric	<p>Vegetation Trimming and use of herbicide to control vegetation on the RD/RJ Utility Line Corridor. TRP excludes access to interior motor vehicle access outside of existing right of ways from November 17-December 9th.</p> <p>General wetlands permit required. Discussion: Mile-a-minute weevil release on Stewart State Forest, Lower Hudson Valley PRISM and doing biocontrol; Internal Audits;</p>
TRP# 12477, Central Hudson	<p>Access to the RD/DJ utility line of line and structure replacement on Stewart State Forest. Matting and invasives. Monitored access site from this point, walking along line. Equipment access to and from the utility line is limited to the shortest route possible and via the access points outlined in the attached "Special Terms and Conditions"; Water chestnut eradication</p>

	in the forest; User group facilitated scheduling with dog/horse/bike people and the Sportsman Federation; fire with unknown and investigation but not a cover type (in process); road maintenance using materials from demolished building;
TRP #12528	Permit for Control of Canadian geese and Mute Swans for airport safety on Stewart State Forest. Control methods will include capture and removal during molt, pyrotechnics, and treating eggs and nest with corn oil. No locations outside of the delineated areas on the attached map will be used with prior-authorization form the NYSDEC.
Vernooy House (Archeao)	Vernooy House, historical structure. Had a recent fire, fencing around and signage for no trespassing. DNR staff nominated this as historic site. Archaeology staff did a site inspection and as a result it was designated a cultural resource, historic building. Mowing in open area surrounding the building as part of maintenance.
TX11275	Harvest, cut not closed. Forester identified the following to be done in closeout: lop tops to reduce debris profile, cut leaning trees, cut down few tall stumps, clean up a few main skid trail ruts. Damage to residual trees fell within acceptable range for the project. Isolated punch-throughs of which forester was aware and fell within acceptable range for the project. Landing inspected. RMZ inspected for identified trout stream and was fully sufficient. Telephone line identified within stand and phone company was notified. Designated deer yard. Discussion: wooly adelgid and other pest surveys, WP beetles, spotted lantern fly, regeneration monitoring.
Firewood Sale	Firewood sale, local sale <\$500. Page 238, stand was designated for uneven aged management of UMP. 60 cords marked.
Wednesday, 11 September 2019: Regions 4 & 7	
REGION 7 – Treaty Line	Sherburne and Cortland Office staff
8:30 AM Sherburne Office	Abbreviated Opening Meeting, final site selections
Chenango 15, Stand A-2.10. Selection harvest, oak regeneration	Mixed oak-hardwood site of 105 acres dominated by red, chestnut, and white oaks being managed to encourage oak regeneration and target of reducing density by 50%. Hardwood pretreatment with 3 different timings of herbicide treatment sections (three years prior, two years prior, and the last in conjunction with the sale itself). Two 40 acre blocks of the stand with stump-cut and/or stump-cut and herbicide application. Retained healthy and vigorous oaks for seed tree and mast production. Red maple targeted for removal. First treatment 2007 and second in 2008 to reduce targeted species for removal. American Chestnut saplings found throughout the stand and protected/retained where possible for genetic diversity. Wildlife trees retained. In general < 22 inch diameter for harvest. Timber Sale and Completion Report (10566). Discussion: Operational scheduling, UMP planning, truck ditch “surfing”
12278 Cemetery future ADA site	Cemetery drive. State arranged harvest of small spur into cultural heritage site. Discussion: Stakeholder input: <i>Oquaga Creek State Park Adventure Trail for Families of New York</i>
LSSF2 CH9 (74) – Firewood 4 cords	Active harvests (revenue, local and fire wood) bid out since July 2018 Township applied for a TRP to remove some trees along a section of town road. After the town felled the trees the firewood was then subsequently sold.
Spruce “swath” thinning	Stand thinned to develop natural regeneration of spruce, targeting 1/5 removal of stand. Discussions: Silviculture options, Research TRP
REGION 4	Stamford and Schenectady Office staff
Delaware Reforestation Area (RA) #9, Stands A-1, A-2, and A-4, Beals Pond SF. Getter Hill Herbicide Project. Contract #21429	Herbicide application contracted for 32 acres targeting American beech, Striped Maple, Hop hornbeam, black birch, New York and Hay-scented ferns. Application methods included cut stump, hack & squirt, basal, and/or foliar. Shape file was offered for contractor.
Delaware RA #5, B-15. Shear Road Herbicide Project	Staff applied herbicide project over 10 acres. Used for training and to apply herbicides to kill American Beech, Black Birch, striped maple, and Hop hornbeam and open understory for

	existing and to cultivate new tree seedling establishment for species such as hard maple, black cherry, red oak and red maple. Examined herbicide application plan (prescription).
Delaware RA #2 Red Pine: Pot Roast Sale	Are harvested in 3 sections, A-C. Red pine about 80 years old marked to cut. Sections A and C with herbicide treatment to reduce undesired understory species and encourage regeneration of desired species. 50-50-50 plan with 50% BA removed in 50 foot wide rows (“swaths”), and 50% retained.
4 Delaware RA #7: Jake’s Last Stand Softwood Sale	Multi-section sale (A-D). Spruce-Red pine mixed stand. Identified Goshawk nest and potential hawk nest sites were buffered. Sections of Parts B, C and D, had herbicide applications for beech, striped maple, and fern using mixtures of hack & squirt (garlon) for undesired trees < 5 fee tall, foliar application for those < 5 feet tall.
Thursday, 12 September 2019:	
9:00 AM	Office interviews and document reviews
Noon	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm evaluation findings
1:00 PM	Closing Meeting: Review preliminary findings (potential non-conformities and observations) and discuss next steps

2.2 Evaluation of Management Systems

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

3. Changes in Management Practices

- There were no significant changes in the management and/or harvesting methods that affect the FME’s conformance to the FSC standards and policies.
- Significant changes occurred since the last evaluation that may affect the FME’s conformance to FSC standards and policies (*describe*):
 1. New state regulations regarding Air Emissions –Diesel regulations that apply to the entire state went into effect this year. These regulations will require new tracking for contractors that use diesel fuel. The state is still developing some aspects of the new regulatory framework. Law requires state, those contracting with the state to retrofit or retire heavy duty diesel vehicles by Jan. 1, 2020. More details regarding regulations may be found here, <https://dmv.ny.gov/inspection/diesel-emissions-inspections>.
 2. State of New York adopted and signed into law a new Act: *Climate Leadership and Community Protection Act. 2019-2020 Regular Session*. This Act sets up a series of tasks forces to look at a variety of programs related to meeting climate goals and objectives. The evaluations include

natural resources with a portion to focus on forest management and lands, including potential to expand to carbon neutral goals. More detail may be found here, <https://www.nysenate.gov/legislation/bills/2019/s6599>.

- Climate Applied Forestry Research Institute – Is part of a new initiative to be created, the New York State Climate and Applied Forestry Research Institute (CAFRI). CAFRI will be a partnership involving NYS Departments of Agriculture and Markets and Environmental Conservation, NYSEDA, SUNY ESF, and Cornell University. The institute will initially focus on forest carbon sequestration research in support of New York’s role in the U.S. Climate Alliance Natural and Working Lands Initiative. See more information about this and other initiatives here, <https://woodproducts.ny.gov/news/new-york-state-announces-new-actions-first-ever-forestry-and-wood-products-summit-advance>

4. Results of Evaluation

4.1 Definitions of Major CARs, Minor CARs and Observations

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

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

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

4.2 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation 2017	1 st Annual Evaluation 2018	2 nd Annual Evaluation 2019	3 rd Annual Evaluation 2020	4 th Annual Evaluation 2021
No findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
P1		Minor 1.5.a	Minor 1.1.b		
P2					
P3					
P4					
P5		Minor 5.1.a Obs 5.1.b Obs 5.6.c	Obs 5.6.c		

P6	Minor 6.5.b OBS 6.5.d				
P7	OBS 7.1.b		Obs 7.2.a		
P8					
P9					
P10					
COC for FM					
Trademark					
Group	N/A				
Other					

4.3 Existing Corrective Action Requests and Observations

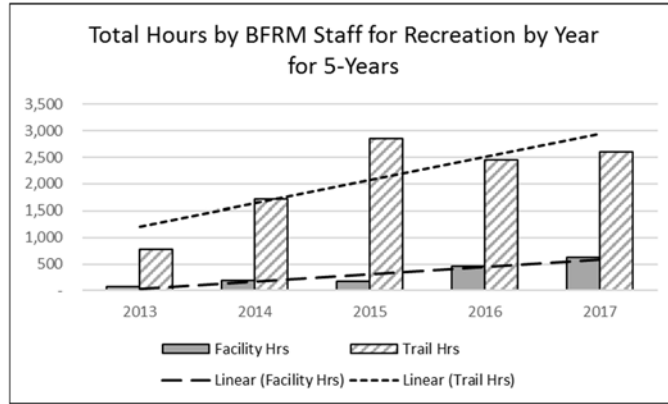
Finding Number: Minor 2018.1	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	1.5.a The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the Forest Management Unit (FMU).
Non-Conformity (or Background/ Justification in the case of Observations):	
<p>The New York State Bureau of Forest Resource Management (NY BFRM) has an effective system to prevent illegal and unauthorized activities on BFRM managed lands. The state lands are organized by Region within which there may be several Offices. The BFRM produces Unit Management Plans (UMPs) for defined areas that may include up to several Regions and associated offices, http://www.dec.ny.gov/lands/4979.html. Each UMP presents known cases of disputes over property ownership and/or property rights and efforts to resolve them. Boundary lines are maintained (inspected during 2018 field site visits), and the audit confirmed that signs are posted and maintained for delineating ownership. Gated roads and trails are common for controlling access to lands. BFRM staff work cooperatively with local law enforcement agencies when trespass or other illegal or unauthorized activities occur. The BFRM maintains support from conservation officers and rangers who patrol the FME and from legal counsel on staff. All of which demonstrate systemic conformity to this indicator.</p> <p>However, in review of the BFRM special permitting system, or Temporary Revocable Permit (TRP), for recreational or other public events, it was discovered that the permit terms, requiring 48 hours’ notice to designated BFRM staff, is not always followed, nor is the failure to notify enforced by BFRM. At the site “R5: Peck Hill State Forest Willie Marsh and UNH Beech Research TRP” (see Site Notes within this report), it was found that a cooperating educational institution, for whom a TRP had been issued a permit for research purposes, failed to notify the forester before commencing activities which resulted in incorrect trees being impacted, essentially an unauthorized activity occurring on the site. During follow-up interviews with staff, it was determined to be relatively common for this notification requirement to be omitted by permittees, and that there were multiple instances of no enforcement by BFRM staff when</p>	

<p>such omissions occur. This requirement for 48 hours’ notice was described as supporting public safety goals, and ensuring any specific permit conditions are followed, that may apply towards preventing unauthorized or illegal activities. This does not result in a fundamental failure of forest protection activities, which justifies the grading of this finding as a Minor CAR.</p>	
<p>Corrective Action Request (or Observation): BFRM must implement measures that prevent illegal and unauthorized activities from occurring on the FMU, or certified state forest lands including recreational, research, and other types of public activities. Development and use of TRPs must consistently support measures to prevent illegal and unauthorized activities from occurring.</p>	
<p>FME response <i>(including any evidence submitted)</i></p>	<p>After some discussions, DEC concluded that there are some activities that require TRPs but may not require prior notification before the activity takes place. DEC decided soon after the 2018 audit to remove this from the “Standard Terms and Conditions” boilerplate language (48 hours’ notice as a standard requirement). It was decided by DEC administration that if regional staff feel it is necessary, at their professional discretion, they may require notification under the “Special Terms and Conditions” section of the TRP. The matter was referred internally within the NYS administration because a legal document was involved.</p>
<p>SCS review</p>	<p>NY State is currently conducting a detailed and comprehensive analysis of the workflows associated with the TRP process. A multi-divisional team was assembled and the comprehensive review started in May 2019. The team assembled includes the support staff person who processes the TRPs and enters into databases; supervisors from Regions 3, 4, 5, 6; FW Supervisors from Region 5/8; Operations staff Region 5; Central Office operations staff (campgrounds); and facilitators for the Lean process being used as the framework for the review project work. The first “kick-off” meeting was June 13, 2019; The “pre-mapping” to identify high level process barriers was June 21, 2019; the team created a process map and identified opportunities for improvement, July 17, 2019; statistical summaries (baseline data) were started and are still underway, early results indicates thousands of TRPs are being done across divisions; workflow analyses are being done now by facilitators. Milestones for the revision process have been started by the team.</p> <p>Milestones are being identified based on the following High Level Process Steps: 1. (Public) Make inquiry about activity on state land; fill out TRP application; 2. (RO) Receive application; 3. (RO & CO) Review application for completeness and appropriate fee request additional information as needed; 4. (RO) Draft permit and log in to State Forest Inventory Database (L&F database); 5. (Regional Land/WL/Fisheries Mgr, NRS) Sign off on draft permit; 6. (RO) Send draft permit package to CO for processing; 7. (CO) Review draft permit package; 8. (CO) Sign off on final permit and return to RO; (RO) Issue permit (TRP).</p> <p>This revision process may include changes to the TRP Policy and contract template language including clarification of notification requirements.</p> <p>While this process continues the DEC is using interim instructions and language under the “Special Instruction” section of the TRPs as was confirmed of several TRPs during the audit (see Site Notes).</p> <p>The new Internal Audit being done by the DEC included TRPs in their discussions and supervisors confirmed during interviews some awareness of the interim. However, these was some confusion about how the new revisions would be communicated effectively to staff (see related, new Minor CAR 2019.2). Actions</p>

	taken, within the context of a state-wide agency related to contract language used by multiple-divisions, are sufficient to warrant closure of this CAR.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: Minor 2018.2	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	5.1.a
<p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>New York State is solvent and capable of systematically implementing core management activities through the Bureau of Forest Resource Management based on reviews of budgeting process, revenues and fees, and budgeted expenditures prior to the 2018 field audit. However, there have been numerous retirements in recent years, and although some positions have been filled, others are on hold for budgetary considerations.</p> <p>A 20% vacancy rate was reported for one Region during the 2018 audit, and analysis of state-wide vacancy rates showed the same level, approximately 20%, of vacancy state-wide for open and approved “Critical Fill” Forester and Forestry Technician positions. Additionally, there is a high rate of turnover for seasonal temporary employees who also conduct critical forestry functions that serve to meet requirements of this standard. Seasonal temporary employees are reported to depart BFRM employment due to low wages, or better pay-rates and opportunities in other states. Ultimately, budget levels or authorization from budget-related, decision-makers directly impact staffing levels. Various forest management activities - environmental, social and operational - are all sustained by appropriate capacity of qualified and competent forestry staff.</p> <p>Supporting Detail:</p> <ol style="list-style-type: none"> 1. Current vacancies for BFRM forestry staff (relevant to nearly every indicator of the FSC US FM standard): Out of 47 Foresters (1-4), there are 6 vacant, there is current 1 vacant Forestry Tech 2 position. 2. Support in forest inventory, regeneration monitoring and other forestry tasks related to certification is provided by seasonal, temporary forestry trainees. The BFRM maintains a range of 13 - 17 forestry trainee positions each year. There are 4 to 5 seasonal employees that leave employment <i>annually</i>. This constitutes a turnover rate of 20%-25% per year. Because these are positions that require some specialized training to ensure minimum quality standards are met, turnover may represent significant loss in program functionality each year and continued loss of time by permanent staff through repeatedly training new employees each year. Interviews also assert that there may be, at times, quality issues for such tasks as forest inventory and regeneration monitoring. 	

3. Current vacancies for staff that supply critical supporting functions for forest management activities (relevant for indicator 1.5.a): Real Property (Total positions – unfilled): 7 Land Surveyor – 2 currently with an approved Critical Fill, 2 Real Estate Specialist 1 – 1 currently with an approved Critical Fill, 3 Real Estate Specialist 2 – 2 currently have an approved Critical Fill, 3 Assistant Land Surveyor 2 – 0 current approved Critical Fill, 4 Assistant Land Surveyor 3 - 0 current approved Critical Fill
4. At the same time, general forestry positions have been vacated, demands of forester time have been increasing for recreational job duties including work on recreational facilities and trails. Recent trend analysis for a 5-year period, 2013-2017 shows an overall increasing trend of hours demanded for completing recreational tasks.



The above chart is based on the table below which shows nearly a 4-fold increase from 2013 to 2017.

Year	Facility Hrs	Trail Hrs	Total
2013	78	779	857
2014	187	1,711	1,898
2015	172	2,850	3,022
2016	462	2,456	2,918
2017	628	2,593	3,221

Finally, BFRM’s timber program has already demonstrated the impact of increasing staff. Production, in terms of acres prepared for timber harvest, was increased by the addition of staff between 2015 and 2016. Through a unique and innovative Timber Initiative program, the BFRM production in 2015 was approximately 7,000 acres sold, this increased to 8,000 acres sold in 2016, through the temporary addition of 11 forestry staff, funded through the initiative, who were devoted strictly to timber sale preparation tasks. However, in 2017 timber sold acres reduced to 7,000 acres after staff reductions occurred through retirement and other sources of attrition essentially canceling out gains made through the Timber Initiative.

Capacity of qualified forestry staff has a direct impact on the BFRM’s ability to respond to increasing demands of public recreation and meeting core forest management goals. New York State is financially solvent and BFRM is systematically implemented core management activities is justification for rating this as a Minor non-conformity.

Corrective Action Request (or Observation):

The BFRM must be able to sustain implementation of core management activities, including all

<p>environmental, social and operating costs required to meet this Standard. This includes investment and reinvestment in forest management and capacity to conduct such management through the provision of competent, qualified forestry staff at appropriate levels. The BFRM must demonstrate that their management system is able to assess increasing program requirements and demands and balance those with appropriate adjustments to forest management and/or forest recreation staffing levels including, but not limited to, filling currently open, approved Critical Fill positions.</p>	
<p>FME response (including any evidence submitted)</p>	<p>Evidence: 1. EXCEL: <i>Staff Roster Filled June 2019</i>, 2. WORD DOC: <i>Stefankotimbersaleinitiative with chart</i></p> <p>Response: The DEC is limited in their ability to influence the budgetary drivers of the hiring process. Critical fill positions are capped annually and authority to conduct hiring is controlled through other New York State administrative divisions (Division of the Budget which is part of the Governor's Office). DEC controls only identification of vacancies and annual identification of Critical Fill positions and some aspects of seasonal temporary staff.</p>
<p>SCS review</p>	<p>The timber sales initiative letter, from Chief of the Bureau of Forest Resource Management, dated January 2019, gives a detailed analysis of costs and benefits of forestry position results in terms of timber revenue generation and also gives detailed recommendations for structural changes, position “fills” and conversion of position types for existing employees. The current staff roster as of June 2019 shows a total of 70 filled positions at the same level as last year for Foresters (1-4) with a total of 49. However, five (5) of 80%-seasonal temp positions were converted to 80% permanent positions and of those three (3) were converted to 100% permanent. DEC staff have taken action along bureaucratic avenues available to them within the governing structure of NYS yielding improvements warranting closure of this CAR.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)</p>

<p>Finding Number: OBS 2018.3</p>	
<p>Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation</p>	
<p>FMU CAR/OBS issued to (when more than one FMU):</p>	
<p>Deadline</p>	<p><input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):</p>
<p>FSC Indicator:</p>	<p>5.1.b. Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.</p>
<p>Non-Conformity (or Background/ Justification in the case of Observations): Overall, auditors determined that the BFRM personnel maintain a continuous, regulated forest</p>	

<p>management program within a budgeting system that is relatively stable. Budgeting is determined on a statewide basis under the directives of the Governor’s Division of Budget in cooperation with BFRM budgeting and administrative staff. Within the framework of the program, forests are regenerated using both natural seed sources, resprouting, and planted tree seedlings designed to either maintain or enhance tree species goals within forest stands. Conifer forest cover types are, in certain situations, retained to contribute to both forest products market diversity and biological diversity as habitat for wildlife and plants.</p> <p>However, during forestry staff interviews, it was discovered that there is inconsistent to poor understanding by field staff of the budgeting process specifically as related to planting funds. Understanding by staff is generally that budgeting for purchasing seedling stock comes from a set of defined funds. However, when such funding may be unavailable, for a variety of reasons, field staff is unaware there are other options or alternatives available for acquiring and planting seedling stock as planned in forest prescriptions. This was evaluated as a lapse that has not resulted in failing seedling program objectives which were met in the cases encountered during audits, thus justifying the grading of this findings as an Observation.</p>	
<p>Corrective Action Request (or Observation): The BFRM should ensure that responses to short-term financial, or budgetary, fluctuations and their implications are understood by forestry staff responsible for seedling planting activities intended to restock stands towards achieving desired future forest conditions.</p>	
<p>FME response (including any evidence submitted)</p>	<p>Evidence: 1. WORD DOC: <i>Planting Funding Guidance</i></p>
<p>SCS review</p>	<p>The above document, dated October 2018, clarifies funding streams and was sent to all DEC forestry staff. Interviews during the audit confirmed the knowledge was effectively disseminated. Such funding was awarded, used, and confirmed as implemented during 2019 field visits. Action taken warrant closure of this CAR.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)</p>

<p>Finding Number: OBS 2018.4</p>	
<p>Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation</p>	
<p>FMU CAR/OBS issued to (when more than one FMU):</p>	
<p>Deadline</p>	<p><input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):</p>
<p>FSC Indicator:</p>	<p>5.6.c. Rates and methods of timber harvest lead to achieving desired conditions and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to</p>

	desired stocking levels and composition at the earliest practicable time as justified in management objectives.
<p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>Desired future forest condition, as defined by the BFRM within the state-wide Strategic Forest Management Plan, includes the creation and maintenance of a variety of age and size classes across the landscape within healthy high-quality stands. Desired stocking levels and composition were observed throughout the audit in the Regions audited in 2018. BFRM’s analyses on progress towards this has determined that young forest age classes are underrepresented in the landscape. The BFRM has taken steps to increase forest management activities designed to generate more young forest stands with support by the Timber and Young Forests Initiatives within state forests.</p> <p>Ensuring sustainable harvest levels within this framework relies, in part, upon state- and region-wide modeling estimates of growth in forest stands with sustainability objectives, including the goal that more forest volume is growing than is being cut Region- and state-wide. However, modeling results from the last Periodic Annual Increment (PAI, 2015), in Region 3, shows stands experiencing negative growth rates. DEC is expecting to update the PAI for 2020.</p> <p>Current tree volume <i>growth</i> on applicable state lands are estimated to be well above actual and projected harvest volumes. From this, auditors concluded that there is low- risk of over-harvesting on a state-wide or Regional basis. However, it is not clear how BFRM is accounting for potential impacts on stand productivity, stocking, and quality of growth by mortality; nor is it clear how forest inventory data is being validated for modeling efforts. There is conformance to this indicator however the interpretations of modeling data would be greatly strengthened by clarifying how ingrowth and mortality are accounted for in data sources and how growth data are being validated.</p>	
<p>Corrective Action Request (or Observation):</p> <p>The BFRM should clarify data sources and methods of validation for growth calculations that are clear in supporting assertions that rates and methods of timber harvest will lead to improving or maintaining health and quality of forest stands across the New York State FMU covered by this certificate. This in turn supports assertions of adequate restocking in such stands that may be overstocked, may have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management.</p>	
<p>FME response (including any evidence submitted)</p>	<p>Evidence:</p> <ol style="list-style-type: none"> 1. August 2019 correspondence with USFS vegetation modeling experts (FSVeg) requesting assistance in supplementing ingrowth and mortality estimations for growth and yield modeling. 2. Consultations with SUNY ESF Professor with expertise.
<p>SCS review</p>	<p>DEC has consulted with experts on both growth and yield modeling and validation of forest inventory data. These consultations have begun to clarify needs for data sources and methodology needed for these activities. DEC reports plans to evaluate CFI plot installations and needs and analyze potential programs for growth and yield modeling such as the USFS FVS. Stakeholder consultation with SUNY ESF professor confirmed these aspects. Given progress made this Observation will not be upgraded. The observation will remain open for continued improvements towards evaluating needs for CFI plots on state land; possible methods for projecting/modeling; and documentation that captures methodology and plans of action for institutional reference.</p>

Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> <i>Other decision (refer to description above): continued via Obs 2019.2</i>
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4.4 New Corrective Action Requests and Observations

Finding Number: Minor 2019.1	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	1.1.b To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.
<p>Non-Conformity (or Background/ Justification in the case of Observations): NY State is currently conducting a detailed and comprehensive analysis of the workflows associated with the TRP process. A multi-divisional team was assembled and the comprehensive review started in May 2019. The team assembled includes the support staff person who processes the TRPs and enters into databases; supervisors from Regions 3, 4, 5, 6; FW Supervisors from Region 5/8; Operations staff Region 5; Central Office operations staff (campgrounds); and facilitators for the Lean process being used as the framework for the review project work. The first “kick-off” meeting was June 13, 2019; The “pre-mapping” to identify high level process barriers was June 21, 2019; the team created a process map and identified opportunities for improvement, July 17, 2019; statistical summaries (baseline data) were started and are still underway, early results indicates thousands of TRPs are being done across divisions; workflow analyses are being done now by facilitators. Milestones for the revision process have been started by the team. Milestones are being identified based on the following High Level Process Steps: 1. (Public) Make inquiry about activity on state land; fill out TRP application; 2. (RO) Receive application; 3. (RO & CO) Review application for completeness and appropriate fee request additional information as needed; 4. (RO) Draft permit and log in to State Forest Inventory Database (L& database); 5. (Regional Land/WL/Fisheries Mgr, NRS) Sign off on draft permit; 6. (RO) Send draft permit package to CO for processing; 7. (CO) Review draft permit package; 8. (CO) Sign off on final permit and return to RO; (RO) Issue permit (TRP). While this process continues the DEC is using interim instructions and language under the “Special Instruction” section of the TRPs, as was confirmed in sampled TRPs during the audit (see Site Notes). The new Internal Audit being done by the DEC included TRPs in their discussions, and supervisors confirmed during interviews some awareness of the interim instructions. However, these was some confusion about how the new revisions would be communicated effectively to all staff involved with TRPs.</p>	

Corrective Action Request (or Observation): To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations, including application of Interim and any future revised TRP policies that apply to DEC lands under scope of the “green certification”.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: OBS 2019.2	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	5.6.c. Rates and methods of timber harvest lead to achieving desired conditions and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.
Non-Conformity (or Background/ Justification in the case of Observations): DEC has consulted with experts on both growth and yield modeling and validation of forest inventory data. These consultations are clarifying needs for data sources and methodology needed for these activities. DEC reports plans to evaluate CFI plot installations and needs and analyze potential programs for growth and yield modeling such as the USFS FVS, as an example. Additionally, DEC is aware of and planning the 5-year PAI (periodic growth update, last done 2015). For additional detail see OBS 2018.4.	
Corrective Action Request (or Observation): NY DEC should support efforts to understand how rates of timber harvest lead to achieving desired conditions and improving or maintaining health and quality across the FMU. To support validation of forest inventory and modeling, NY DEC should continue improvements towards understanding needs for CFI plots on state land; possible methods for projecting/modeling growth and yield; and documentation that captures methodology and plans of action for institutional reference.	
FME response <i>(including any evidence submitted)</i>	

SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: OBS 2019.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.
Non-Conformity (or Background/ Justification in the case of Observations): The DEC has 7 State Forest Regions which work collaboratively with multiple Divisions. Overall, the DEC is in conformance with this indicator. However, interviews during the 2019 audit identified some inconsistencies about how frequently such scientific/technical reviews are done and incorporated into forestry work for implementing forest management plan (SF UMPs).	
Corrective Action Request (or Observation): When incorporating new scientific and technical information into technical implementation of new scientific and technical information, the DEC could improve consistency across all SF Regions.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

5. Stakeholder Comments

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

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the standard, and the nature of the interaction between the FME and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

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

5.1 Stakeholder Groups Consulted

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

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

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

<input type="checkbox"/> FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual evaluation.	
Stakeholder Comment	SCS Response
An Academic stakeholder was consulted regarding growth and yield modeling.	See Obs 2018.3 and Obs 2019.2.

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME’s response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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Comments:

7. Annual Data Update

<input type="checkbox"/> No changes since previous evaluation.	
<input type="checkbox"/> Information in the following sections has changed since previous evaluation.	
<input type="checkbox"/> Name and Contact Information <input type="checkbox"/> FSC Sales Information <input checked="" type="checkbox"/> Scope of Certificate <input type="checkbox"/> Non-SLIMF FMUs <input type="checkbox"/> Social Information	<input checked="" type="checkbox"/> Pesticide and Other Chemical Use <input type="checkbox"/> Production Forests <input type="checkbox"/> FSC Product Classification <input checked="" type="checkbox"/> Conservation & High Conservation Value Areas <input type="checkbox"/> Areas Outside of the Scope of Certification

Name and Contact Information

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

FSC Sales Information

<input checked="" type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson			
Address		Telephone	
		Fax	
		e-mail	
		Website	

Scope of Certificate

Certificate Type	<input checked="" type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)		
Number of FMUs in scope of certificate		
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude: 42.6529/-73.7491	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical

Total forest area in scope of certificate which is:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac	
privately managed	0		
state managed	781,979		
community managed	0		
Number of FMUs in scope that are:			
less than 100 ha in area		100 - 1000 ha in area	
1000 - 10 000 ha in area		more than 10 000 ha in area	1
Total forest area in scope of certificate which is included in FMUs that:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac	
are less than 100 ha in area	0		
are between 100 ha and 1000 ha in area	0		
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0		
Division of FMUs into manageable units:			
<p>This FME maintains 9 regional offices located throughout the state of which 7 regional areas are certified. Within each region, the Division of Operations supports the Bureau of Forest Resource Management, BFRM, by providing technical services, facilities management, and maintenance of physical assets. The Bureau of Fish and Wildlife assists with developing management decisions to protect species and habitat. The Divisions of Law Enforcement and Forest Protection provide support through law enforcement, education and public outreach. Personnel from each Division are assigned to regional offices and collaborate to manage the Reforestation Areas, Multiple Use Areas, Unique Areas, and State Nature and Historic Preserves within the scope of this assessment.</p> <p>Land within each region is grouped into planning units. A Unit Management Plan is written for each unit and includes objectives and activities that are designed to accomplish specific management goals. This FME maintains 74 planning units.</p>			

Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
# of male workers: 56	# of female workers: 14	
Number of accidents in forest work since previous evaluation:	Serious: 0	Fatal: 0

Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied since previous evaluation (kg or lbs.)	Total area treated since previous evaluation (ha or ac)	Reason for use
Accord XRT II	glyphosate	711	58.45	Control of knotweed, garlic mustard and perennial weeds. Control beech, striped maple,

				ironwood: hack & squirt application. Backpack sprayer foliar on fern; Stem injection on beech and striped maple
Accord XRT2/Oust	glyphosate/ sulfometuron methyl	34	1.05	Foliar spray on fern and honeysuckle
Arsenal	glyphosate	75	0.62	Hack and squirt to control beech, striped maple, ironwood, soft maple, and birch; Foliar spray on pale swallowwort
Arsenal Powerline	imazapyr	10.5	1.69	Foliar spray to control Honeysuckle and other undesirable understory species.
Belt SC	Flubendiamide	30.5	0.48	Agriculture
Callisto	Mesotrione	31	1.43	Agriculture
Credit 41 Extra	glyphosate	37	24.00	Foliar spray to control Beech.
Escort XP	Metsulfuron methyl Methyl	5	0.01	ROW maintenance
Explorer 4x1GA	Mesotrione	15	0.70	Agriculture
Garlon 3A	triclopyr	184	4.20	Hack and squirt to control beech, striped maple, ironwood, soft maple, and birch
Garlon 4 Ultra	triclopyr	17	1.25	Basal bark treatment to control undesirable regeneration species;
Garlon 4 w/ Impel Basal Oil	triclopyr	9	4.20	Foliar spray for beech and striped maple
Krenite S	Ammonium salt of fosamine	5	1.82	Agriculture
Mad Dog	glyphosate	1	0.143	Foliar spray to control Phragmites & Locust
Mad Dog & Garlon 4 Ultra	glyphosate & triclopyr	1	3/.75	Foliar spray to control Swallow-wort
Metriburzin 75	Metribuzin	2	1.5 lbs	Agriculture
Oust	sulfometuron- metyl	205	1.50	Foliar to control invasive spp and ferns
Oust XP	sulfometuron- metyl	865	10	Foliar spray on fern, beech, ironwood, rubus and invasive spp.; Stem injection on beech and striped maple
Polaris AC Complete	imazapyr isoprolamine salt	184	0.09	Hack and squirt to control beech, striped maple, ironwood, soft maple, and birch; Foliar to control invasive spp and ferns
Polyram	Metiram	2.0	9 lbs	Agriculture
Quintec	Quinoline	18	0.68	Agriculture

Radiant SC	Spinetoram	29.5	1.6875	Agriculture
Ranger Pro	glyphosate	76	4.85	Hack & Squirt to control Beech
Rodeo	Glyphosate	1508	222	Control beech, striped maple, ironwood: hack & squirt application. Backpack sprayer foliar on fern; Stem injection on beech and striped maple
Rodeo/ Arsenal	glypho/ imazapyr	31	3.19/.06	Control beech, striped maple, ironwood: hack & squirt application
Round Up Pro	glyphosate	574	55	Foliar spray to control beech and fern
Roundup Promax	glyphosate	1.40	1.58	Control of invasive Japanese knotweed and swallow-wort
Stalwart 2x2.5GA	Metolachlor	15	2.52	Agriculture
Strategy	Clomazone Ethalfluralin	18	6.5625	Agriculture
Tank mix of - 7% Rodeo, 4floz/100 gal Escort XP, and 1% Polaris carried in Thinvert RTU	glyphosate / metsulfuron methyl methyl 2 / isopropylamine salt of imazapyr	1	2.50	Foliar spray to control Knotweed
Tank mix of 8% Rodeo and 1% Polaris carried in Thinvert RTU	glyphosate / isopropylamine salt of imazapyr	5	1.86/.23	Foliar spray to control Knotweed
Vivando	Metrafenone	12	1.4438	Agriculture
Weather Gard complete	Letchin	15	0.5500	Agriculture
Wrangler	Imidacloprid	2.0	0.1563	Agriculture

Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	673,000
Area of production forest classified as 'plantation'	-
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	20,000
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	650,000
Silvicultural system(s)	Area under type of management
Even-aged management	
Clearcut (clearcut size range)	304
Shelterwood	464

Other:	4140
Uneven-aged management	1634
Individual tree selection	
Group selection	
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	
Other areas managed for NTFPs or services	
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	
Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name)	
<i>Acer rubrum</i> , Red Maple; <i>Acer saccharum</i> , Sugar Maple; <i>Prunus serotina</i> , Black Cherry; <i>Quercus rubra</i> , Red Oak; <i>Quercus alba</i> , White Oak; <i>Fraxinus americana</i> , White Ash; <i>Tsuga canadensis</i> , Eastern Hemlock; <i>Abies balsamea</i> , Balsam Fir; <i>Larix laricina</i> , Eastern Larch; <i>Picea abies</i> Norway Spruce; <i>Pinus strobus</i> , White Pine; <i>Pinus resinosa</i> , Red Pine; <i>Picea rubens</i> , Red Spruce	

FSC Product Classification

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

Conservation and High Conservation Value Areas

Conservation Area	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	108979

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

High Conservation Value Forest / Areas			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of	Special Treatment: New York Natural Heritage Element Occurrences (non-community type only) with survey dates	18,625

	biodiversity values (e.g. endemism, endangered species, refugia).	between 1990-2013 with a state “rarity” rank of S1, S2, and S1S2. Clipped to State Forests	
HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Rare Community: New York Natural Heritage Element Occurrences (community type only) with survey dates between 1990-2013 with a state “rarity” rank of S1, S2, and S1S2. Clipped to State Forests	11,328
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Watershed: Portions of State Forests that overlay Sole and Primary Source Aquifers, have public water supply intakes downstream within the Hydrologic Unit Code (HUC) 12 watershed or are within the Department of Health Source Water Assessment Program Plan (DOH SWAPP) delineated buffers (zone of influence) around public ground water wells that are surface water influenced.	124,336
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	Cultural Heritage: Currently over 825 point locations that are delineated on the ground by forestry/field staff representing any number of culturally significant/historic sites in our state land assets data set.	n/a
HCV6	Forests or areas critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	Cultural Heritage: Currently over 825 point locations that are delineated on the ground by forestry/field staff representing any number of culturally significant/historic sites in our state land assets data set.	
Total area of forest classified as ‘High Conservation Value Forest / Area’			154, 289

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

N/A – All forestland owned or managed by the applicant is included in the scope.

<input checked="" type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
Explanation for exclusion of FMUs and/or excision:	<p>New York State owns and manages 2,800,000 acres of Forever Wild Forests within the Adirondack Forest Preserve and 300,000 acres within the Catskill Forest Preserve. These acreages are part of a preserve system where harvesting is not allowed and excluded from this certificate.</p> <p>Additional acreages located on Long Island are not harvested and are not included within this certificate.</p>	
Control measures to prevent mixing of certified and non-certified product (C8.3):	Harvesting does not take place in the excluded acreage.	
Description of FMUs excluded from, or forested area excised from, the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)
Adirondack Forest Preserve	NY, USA	2,800,000
Catskill Forest Preserve	NY, USA	300,000
NY DEC Region 1	Suffolk County, NY, USA	16,218
NY DEC Region 2	Bronx, Richmond and Queens Counties (Long Island), NY, USA	770
NY DEC Region 7	Lower Salmon River State Forest	1726

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected for Evaluation

- FME consists of a single FMU
- FME consists of multiple FMUs or is a Group

Appendix 2 – Staff and Stakeholders Consulted

List of FME Staff Consulted

To protect privacy, only stakeholders who have expressly provided written permission are listed.

Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Stakeholders included in Appendix 2 have given their permission to include their name, contact details, and comments in the report. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities.

List of other Stakeholders Consulted*

To protect privacy, only stakeholders who have expressly provided written permission are listed.

Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Stakeholders included in Appendix 2 have given their permission to include their name, contact details, and comments in the report. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities.

Appendix 3 – Additional Evaluation Techniques Employed

- None.
- Additional techniques employed (*describe*):

Appendix 4 – Required Tracking

Pesticide Derogations

- There are no active pesticide derogations for this FME.

Progressive HCVF Assessments

- FME does not use partial or progressive HCVF assessments.

Appendix 5 – Forest Management Standard Conformance Table

Criteria required by FSC at every surveillance evaluation (<i>check all situations that apply</i>)	<ul style="list-style-type: none"> <input type="checkbox"/> NA – all FMUs are exempt from these requirements. <input type="checkbox"/> Plantations > 10,000 ha (24,710 ac): 2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, and 10.8 <input checked="" type="checkbox"/> Natural forests > 50,000 ha (123,553 ac) ('low intensity' SLIMFs exempt): 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, and 9.4
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	<input checked="" type="checkbox"/> FMUs containing High Conservation Values ('small forest' SLIMFs exempt): 6.2, 6.3, 6.9 and 9.4
Documents and records reviewed for FMUs/sites sampled	<input checked="" type="checkbox"/> All applicable documents and records as required in section 7 of audit plan were reviewed; or <input type="checkbox"/> The following documents and records as required in section 7 of the audit plan were NOT reviewed (<i>provide explanation</i>):

Requirements Reviewed in Annual Evaluation

Evaluation Year	Requirements Reviewed (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.)
2018	All – (Re)certification Evaluation
2019	P1, P2, and P9; mandatory Criteria
2020	
2021	
2022	

The acronyms below apply to all tables in Appendices 5 through 8.

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

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles		
Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
1.1 Forest management shall respect all national and local laws and administrative requirements.		
1.1.a Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.	C	The legal framework for management of state forest lands in New York is found in the Strategic Plan for State Forest Management (<i>Strategic Plan</i>) (e.g., pages 33 and 317) and is referenced in each Unit Management Plan (UMP). The Strategic Plan may be found in its entirety here, http://www.dec.ny.gov/lands/64567.html . Also, each UMP includes an appendix outlining compliance with the State Environmental Quality Review Act (SEQRA). No evidence of non-compliance with applicable statutes was submitted to auditors, or otherwise detected.
1.1.b To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	NC	Central office personnel provided several examples of mechanisms used to inform employees about applicable statutes. Examples were provided on the internal website (In-Site) used for reference, and

		from specific training exercises. Interviews with employees confirmed such training. However, see Minor 2019.1.
1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	
1.2.a The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.	C	State forest lands are subject to local property taxes. Taxes are paid by the NYS Department of Taxation and Finance. A spreadsheet detailing such payments for every parcel of state forest land was provided to auditors. By statute the DEC pays taxes on reforestation areas. Three Town, County, School taxes only pay Town and School. Amounts calculated by Department of Taxation and finance on a per acre basis.
1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.	C	New York State is a hub for international trade, and thus has substantial law enforcement capabilities, both federal and state. On state forests, the Divisions of Law Enforcement and Forest Protection assist with compliance.
1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	C	No such conflicts have occurred between FSC and the FME. Interviews with FSC Coordinator confirm staff has knowledge of need to report any such conflicts should they occur. The topic was specifically explored in discussions regarding changes to line of sight expansions following 9-11 that were mandated at the federal level but had no impact on NY state lands.
1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).	C	UMPs present known cases of disputes over property ownership and/or property rights and efforts to resolve them. Boundary lines are maintained (inspected in the field on several occasions), and appropriate signs are posted and maintained. Gated roads and trails are common.

		<p>Gates and signs are used effectively to prevent unauthorized activities. Gates and signs were observed during on-site visits to regions visited in 2019. This FME maintains support from conservation officers and rangers who patrol the FME and from legal counsel. For example, ATV damage at Chenango 15, see Site Notes, was addressed immediately by email to the appropriate Ranger for available legal actions. Staff was knowledgeable and discussed a wide variety of protective measures that can and have been adopted to address ATV damage in particular, and other types of damage in general.</p> <p>There was one incident involving a Consent Order by a Region 3, Regional Attorney to address illegal activities the neighbor was involved with on State Forest lands including dumping and illegal pesticide use. Potential causes include lack of knowledge on part of the perpetrator of existing Environmental Conservation Laws regarding: 1) permitted uses of NYSDEC State Forest lands; 2) pesticide use, registration and appropriate licensing needed to apply restricted use pesticides legally in NYS, and 3) disposal of solid waste. The case was referred to the regional Office of General Counsel with numerous infractions of Environmental Conservation Laws related to State Forest Lands, Pesticides and Solid Waste. A meeting to discuss a Consent Order crafted to resolve the violations was held with the neighbor and his lawyers December 2018. A consent order was signed on 12/11/18 outlining the penalties the perpetrator is responsible for. Communication with regional staff on 9/6/19 confirm that fines have been paid and illegal dumping has been removed. See also closure of 2018.1 for more detail.</p>
<p>1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.</p>	<p>C</p>	<p>Environmental Conservation Officers (ECOs) and Forest Rangers are available for enforcement and are well-staffed. DEC maintains a robust staff of attorneys in Central Office and Regional Offices to pursue illegal actions and conflicts. This was demonstrated during the 2019 audit by the ATV damage at Chenango 15, see Site Notes.</p>
<p>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p>	<p>C</p>	
<p>1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles</p>	<p>C</p>	<p>DEC web page has a detailed statement of commitment to FSC principles and to the</p>

<p>and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.</p>		<p>management of the FMU in conformance to the standards.</p>
<p>1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.</p>	<p>C</p>	<p>BFRM has consistently excluded two of eight regions near NYC that have no forest management. The Bureau also excludes Forest Preserve lands, consistent with the State Constitution.</p>
<p>1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.</p>	<p>C</p>	<p>The annual data update form submitted to SCS prior to the audit listed the acreages as reported under the Scope section of the report. When questioned during the audit, a staff member produced a listing of state forest lands that included some new acquisitions. BFRM often acquires new parcels of state forests and provides Acreage Handbook and Acquisitions each year (2019 latest received).</p> <p>Bureau of Real Property (RP) tracks all of DEC acquisitions DEC SLIM, State Lands Interactive Mapper.</p>
<p>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p>	<p>NE</p>	
<p>2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies. <i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i></p>	<p>NE</p>	
<p>2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	<p>C</p>	
<p>2.3.a If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially</p>	<p>C</p>	<p>Most tenure claims relate to property boundaries, but significant boundaries have all been surveyed</p>

<p>attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p>		<p>and marked, so disputes usually are settled within the regions where the properties occur. If necessary, DEC has adequate legal staff to address more serious disputes. Bureau Chief related several examples of ongoing trespass disputes and their resolution.</p> <p>Although not formal disputes, the UMP system includes Current Management Issues or otherwise sections of the plan to treat stakeholder issues.</p>
<p>2.3.b The forest owner or manager documents any significant disputes over tenure and use rights.</p>	<p>C</p>	<p>Files that document past disputes are available in regional offices were visited during the audit.</p>
<p>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p>		
<p>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</p>	<p>NE</p>	<p>Tribal forests are not included in this FMU.</p>
<p>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	<p>C</p>	
<p>3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.</p>	<p>C</p>	<p>Auditors interviewed State Forests UMP Coordinator in consulting and facilitations with Indian Affairs Coordinator, Office of Environmental Justice. Among other initiatives, the DEC conducts annual meetings with Indian Nations done by the Chief of the Bureau of Forest Resource Management.</p>
<p>3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.</p>	<p>C</p>	<p>The FME’s policy, <i>Contact, Cooperation, and Consultation with Indian Nations (CP-42)</i>, requires that the NY BFRM undertake good faith efforts to consult with Indian Nations on any Department BFRM decision or action which could foreseeably have Indian Nation implications. During discussions with NY BFRM staff, the auditors learned that the level of consultation with Indian Nations at the local level varies across the state. For example, Region 6 staff confirmed that no effort was made to contact Indian Nations as part of developing the Oneida Hills UMP. Discussions with staff in other regions suggest that not all employees are aware of the requirement for consulting with Indian Nations on forest management planning; this observation and the variability in consultation was confirmed by state-level staff.</p> <p>NYSDEC has implemented a protocol where staff work with the Indian Affairs Coordinator and UMP Coordinator to contact relevant Indian Nations</p>

		directly during the UMP development process to offer an opportunity to consult with the DEC directly.
3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	NE	
3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NE	
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	NE	
4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	C	
4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	<p>NY State has a well-developed administration that establishes appropriate laws and regulations for safety, with conformance observed throughout the 2019 audit by BFRM employees.</p> <p>The BFRM has a health and safety system with policies and procedures that are well developed and largely understood by staff, as observed and confirmed through interviews during the audit. Several types of safety training are offered and completed by staff as confirmed by review of training records.</p> <p>BFRM SOP B-11, <i>Log landing Timber Harvest Jobsite Awareness Training</i> is a procedure that determines PPE use by job functionality. BFRM Vehicle Policy outlines the vehicle replacement requirements. Other relevant documents include: Active Timber Harvest revision_blw.docx; BFRMVehiclePolicyReminder.docx; Health and Safety Manual.msg; RE Vehicle replacement request procedure.msg; FINAL TLC Contract Language.docx. There are safety provisions under “active timber harvest” in the <i>NYBFRM Health and Safety Manual</i>.</p>
4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety	C	Timber sale contracts and employee handbooks were examined during the audit to confirm that expectations for safety were specified. Auditors

<p>requirements.</p>		<p>found consistency in the Notice of Sale requirements and compliance by the one contractor interviewed on site. See also 4.2.a., above.</p>
<p>4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p>	<p>C</p>	<p>Logging contractors are the most common service providers. They are selected through well-established bidding processes with detailed contract provisions. Trained Logger Certification is a requirement in Timber Sale Contracts. Interviews on-site and separate confirmations with logger training programs confirmed.</p>
<p>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p>	<p>NE</p>	
<p>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</p>		
<p>4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> • Archeological sites and sites of cultural, historical and community significance (on and off the FMU); • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p>	<p>C</p>	<p>This FME completed a Summary Report of the New York State Social Impact Assessment of State Land Management during summer 2012 that was based on a survey of user groups. This FME also maintains a system for notifying the public, receiving comments and incorporating comments into management plans and proposed activities.</p> <ul style="list-style-type: none"> • The social impacts associated with archeological sites are minimized through consultation with tribal groups and consultation with Historic Preservation Officer for the Division of Lands and Forests who maintains a database of known cultural sites and provides this information to staff during the Unit Management Planning process. This information is also incorporated into a GIS data layer as confirmed during a demonstration of the GIS system. The Strategic Plan for SF Management (p. 137, 181) includes sections on archeological, cultural, historical and community resources. • The Strategic Plan for SF Management (for example p. 107, 181, 189-192) includes sections on air, water and subsistence resources. Each unit management plan incorporates local details into the text. • The Strategic Plan for SF Management (p. 125) and each unit management plan include a

		<p>section on visual and aesthetic resources. For example, aesthetic considerations were specifically incorporated into roadside harvest operations observed during field visit to contract LSSF2 CH9 (74) during the 2019 audit.</p> <ul style="list-style-type: none"> • The Strategic Plan for SF Management (p. 181, 243) includes sections on supporting local communities. Each unit management plan incorporates local details into the text including for example the Six Nations Unit Management Plan (p. 81) that describes that gates on 2 roads continue to be opened for hunting season and a description for example fishing opportunities. • The Strategic Plan for SF Management (p. 243) includes a section on community economic opportunities. A variety of timber harvest project sizes are designed to provide local opportunities including for example smaller (“local”) sales. Several were included in the 2019 audit, see Site Notes. • The Strategic Plan for SF Management (for example p. 171-244) includes a section for example on public/permitted uses including for example universal access, motorized access for people with disabilities, formal and informal partnerships. The Summary Report of the New York State Social Impact Assessment of State Land Management was presented and reviewed and includes a review of the likely social benefits and concerns of management activities. <p>As a state agency, BFRM relies on input from the public and to assess social impacts of resource management. Social impacts are addressed in the <i>Strategic Plan</i>, and in detail as UMPs are revised. A summary can be found on public DEC web pages.</p>
<p>4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	<p>C</p>	<p>This FME maintains a system for notifying the public for example of proposed management activities and planning documents in conformance with the requirements of 4.4a and 4.4b. This step is completed during the draft planning process and again in each final plan. Written comments and FME responses are incorporated into Unit Management Plan documents. FME responses were reviewed and reflected well on the agency’s ability to consider input effectively.</p>

		<p>BFRM seeks input from the public at all levels of planning, especially in development of Unit Management Plans (public process discussed during audit in Regions 3 and 5). Stakeholder comments and responses are found in sections or appendices of each UMP, e.g., Vernooy Kill SF UMP.</p>
<p>4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	<p>C</p>	<p>This FME maintains a system for notifying the public for example of proposed management activities. This step is completed during the draft planning process and again in each final plan. Written comments and FME responses are incorporated into Unit Management Plan documents for example. FME responses were reviewed and confirmed the agency’s ability to consider input effectively.</p> <p>Foresters interviewed on site visits indicated that they use judgement in determining the level of contact with nearby landowners prior to any harvesting activities. Most commonly, landowners observe activities of foresters during sale layout and take the initiative to inquire about planned management. Several examples were reviewed in folders for harvests examined during the 2019 audit.</p>
<p>4.4.d For <i>public forests</i>, consultation shall include the following components:</p> <ol style="list-style-type: none"> 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>	<p>C</p>	<ol style="list-style-type: none"> 1. This FME maintains a system for notifying the public for example of proposed management activities and planning documents. This step is completed during the draft planning process and again in each final plan. A draft schedule of harvest plans is included within each draft and final unit management plan. Kiosks are also used in some SFs and provide an opportunity for users to provide a response directly to SF staff. SFs offices are also open to the public and provide another accessible location for comment. 2. This FME generally uses a 30-day public comment period. 3. This FME’s appeals processes are transparent and affordable. For example, the agency website includes a section for public involvement including links to “have a question?”; “make your voice heard”; “find out what is happening”; “public access to DEC documents” and “more about public involvement and news”. <p>Written comments and FME responses are incorporated into Unit Management Plans.</p>

		See 4.4a-c: BFRM staff are aware of the importance of consulting with the public. The DEC has clearly defined processes for appeals from the public. All UMPs include summary of public comments and responses to them.
4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.	NE	
Principle #5: Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.		
5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.	C	New York State is solvent and capable of implementing core management activities. There have been numerous retirements in recent years and although some have been filled others are on hold for budgetary considerations. See closure of Minor 2018.2 for more detail.
5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	C	Even though BFRM was short-handed for several years during the recent financial crisis, existing personnel were still able to carry on operations consistent with the Standard. See closure of OBS 2018.3 for more detail.
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.	NE	
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	NE	
5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	NE	
5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.		
5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	C	

<p>5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>	<p>C</p>	<p>This FME is harvesting at a conservative rate as confirmed through review of AAC calculations and harvest data from the past 5 years.</p> <p>This FME’s harvest level is determined as part of the unit management plan process. The sustained yield calculation is based on inventory data that include:</p> <ul style="list-style-type: none"> • As confirmed on p. 251 in The Strategic Plan for SF Management (2010) and Estimating Periodic Annual Increment on SF Lands in New York (2010) and through interviews itemized elsewhere in this report, calculations were based on documented growth rates for acreages of each forest type/age class and species distribution. • As confirmed on p. 252 in The Strategic Plan for SF Management (2010) and interviews itemized elsewhere in this report, calculations include mortality and decay. • As confirmed on p. 251 in The Strategic Plan for SF Management (2010) and Estimating Periodic Annual Increment on SF Lands in New York (2010) and through interviews itemized elsewhere in this report, all forest acres were used to complete this growth and sustained yield harvest calculation. • Annual harvest levels are based on silvicultural practices on areas subject to harvests as described in each unit management plan. • Annual harvest levels accurately but conservatively reflect the management objectives and desired future conditions as described by each unit management plan. For example, the draft Hemlock-Candice Unit Management Plan includes text and a table describing Management Objectives and Actions (pp 55-60 and the desired future condition (pp 64-71)). <p>The harvest level is conservative as confirmed through review of AAC calculations and harvest data from the past 10 years and p. 252 in The Strategic Plan for SF Management (2010). Current harvests average around 43 million bf per year.</p> <p>Management units are defined by each region, and harvest schedules are planned for these units based</p>
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		<p>on conditions in each stand and appropriate silviculture and desired future conditions. These plans do not set a sustained harvest level per se. As public lands, there is a history of harvesting less than the annual increment of growth in order to meet other management objectives. Periodically, DEC analyzes inventory data and confirms that harvest is well below annual growth.</p>
<p>5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p>	<p>C</p>	<p>This FME is harvesting at a conservative rate as confirmed through review of AAC calculations and harvest data from the past 10 years and p. 252 in The Strategic Plan for State Forest Management (2010). Current harvests yield 17,485 Mbf plus 27,000 cords (~ 31 million bf/per year).</p> <p>DEC has contracted analysis of Periodic Annual Increment (PAI) to researchers at SUNY-ESF, the first in 2010 and a follow-up in 2015. In both studies, the finding was that DEC is cutting considerably less than what is being grown. Current estimate is 25-30% of growth. See <i>Updating of Periodic Annual Increment on State Forest Lands in New York</i>, September, 2015. Auditors were presented with actual harvest data for the past year, confirming that harvesting has been conservative with regard to a sustained yield harvest level.</p>
<p>5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	<p>C (Obs)</p>	<p>This FME’s desired future condition includes the creation and maintenance of a variety of age and size classes within healthy high quality stands. Significant early-successional habitat has been created through a variety of silvicultural treatments such as patch cuts and salvage operations. See site notes. See Obs 2018.4 and 2019.2 for more detail.</p>
<p>5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p>	<p>NE</p>	
<p>Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</p>		

<p>6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</p>	<p>NE</p>	
<p>6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>	<p>C</p>	
<p>6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	<p>C</p>	<p>Natural Heritage Surveys have been completed in all regions. It is required for foresters to consult the GIS database of RTE species when planning a harvest. A second database, Predicted Richness Overlay (PRO) has been developed by the Natural Heritage Program to predict sites that may include rare species and communities. Evidence that both sources of information are being used was found on all <i>Stand Diagnosis and Prescription</i> forms examined during the audit and in repeated questioning of foresters in the field.</p>
<p>6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	<p>C</p>	<p>In Region 3, several examples were presented and discussed where measures were taken in planning and implementation of harvest to protect unique habitats and rare species. Personnel from the Natural Heritage Program and Bureau of Wildlife are available for consultation on appropriate conservation measures to protect RTE species and communities.</p> <p>2019: Timber harvesting is the only significant activity that may occur within or near protected areas. Implementation of BMPs, adequate buffers and monitoring occur when conducting inventory, writing prescriptions and designing harvests. Significant oversight of harvesting activities is adhered to for protecting these sensitive areas.</p>
<p>6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are</p>	<p>C</p>	<p>The <i>Strategic Plan</i> contains landscape-level biodiversity plans. Some of these feature the</p>

<p>designed to meet species’ recovery goals, as well as landscape level biodiversity conservation goals.</p>		<p>recovery of rare species. Efforts to protect habitat for timber rattlesnakes in Region 3 was such an example during the audit. BFRM and Bureau of Wildlife collaborate frequently, so it should be expected that recovery efforts would be coordinated.</p>
<p>6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	<p>C</p>	<p>DEC’s Conservation Officers are well equipped to enforce the many state and federal regulations pertinent to this indicator. Gated roads are maintained to restrict vehicle access in many places. Collecting materials from state forests is regulated through Part 190 of the Environmental Conservation Law and the Temporary Revocable Permitting process. 2019: Recreational and hunting activities are regulated and enforced by DEC Forest Rangers. Additionally, collecting materials off State Forests is regulated through Part 190 of the Environmental Conservation Law and the Temporary Revocable Permitting process.</p>
<p>6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	<p>C</p>	
<p>6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented successional stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>	<p>C</p>	<p>Ecoregional Landscape Assessments, in the <i>Strategic Plan</i>, present summaries of landscape assessments for seven ecoregions in the state. Land cover and age-class distributions were examined. UMPs build on the <i>Strategic Plan</i> and provide details of current and planned distributions of forest types and age classes. The Six Nations UMP confirms this. 2019: Currently, early successional forests types tend to be the most under-represented stages on State Forests. Proper forest management attempts to meet many of these habitat needs.</p>
<p>6.3.a.2 When a rare ecological community is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, conservation zones and/or protected areas are established where warranted.</p>	<p>C</p>	<p>Rare communities are part of the Natural Heritage database and are treated in the same manner as rare species during harvest planning and management.</p>
<p>6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth</p>	<p>C</p>	<p>Old-growth stands are found almost exclusively within the Forest Preserve system which is owned and managed by this FME but is not part of this</p>

<p>are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 		<p>FME’s certified land base. As part of the Forest Preserve system, these old growth stands are protected from harvesting and other timber management activities. Where other old-growth stands are found, they are classified as HCVF and protected from harvest.</p> <p>2019: Late successional forests are either managed to maintain their character or protected from negative impacts from harvesting, weather, pests and pathogens.</p>
<p>6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal</p>	<p>C</p>	<p>Habitat for wildlife is a major objective for BFRM, as confirmed by examining both the Strategic Plan and various UMPs. Wildlife biologists from Bureau of Wildlife are often housed with BFRM personnel and participate in UMP development. Most recently, the</p>

<p>species that are characteristic of forest ecosystems within the landscape.</p>		<p>“young forest initiative” of the Wildlife Bureau has increased such cooperation and is contributing to addressing the overall lack of early-successional habitat on the landscape. One example discussed during audit was habitat for New England cottontails, a Threatened species.</p> <p>2019: As an example, staff have implemented treatments for the establishment of early successional habitat to benefit grouse by releasing aspen. Staff have also worked with Division of Fish and Wildlife to enhance New England cottontail habitat and have buffered nesting sites for Goshawk and other known raptors found on State Forests.</p>
<p>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ul style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 	<p>C</p>	<p>RMZs are addressed in DEC’s <i>Guidelines for Special Management Zones</i>. Guidelines are clear, but there is an often-used exemption for intrusions into buffer zones in cases where existing or former trails or roads still exist. Exemptions are addressed in each stand prescription and are approved at a regional level. Only one such example was observed and discussed during the field audit, a marked sale in Ulster 8. See <i>DEC Division of Lands and Forests Management Rules for Establishment of Special Management Zones on State Forests (SMZ Rules)</i>.</p> <p>2019: It is common for management activities to take place near water features. Staff are required to follow the Special Management Zone Rules for State Forest and Wildlife Management Areas.</p>
<p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	<p>C</p>	<p>Management plans and harvest prescriptions address plant species composition. Site conditions are routinely used to determine appropriate species. This FME’s clear-cut policy and plantation policy provide direction toward natural species distributions. As existing plantations mature and are converted to a mix of native species</p> <p>UMPs and the <i>Strategic Plan</i> emphasize the importance of using an analysis of site conditions to determine management goals and objectives for forest types. Field visits confirmed efforts to promote natural regeneration.</p>
<p>6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management</p>	<p>C</p>	<p>Planting is not widely used for regeneration. The state nursery provides planting materials that are from local sources when supplemental planting is the preferred option. Some use of Norway spruce</p>

<p>objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>		<p>(<i>Picea abies</i>) continues and has been documented to be non-invasive in this region.</p> <p>Most regeneration is natural, but some planting is still done, using local stock from state. See Policy ONR-DLF-1 Plantation Management on State Forests: http://www.dec.ny.gov/lands/69658.html</p> <p>2019: Most seedlings planted on State Forests are supplied by the NYS DEC Saratoga Tree Nursery. Most of the seeds used for growing seedlings comes from seed orchards established on State Forests across New York. This year, due to shortages of seedling at our nursery, we had to procure approximately 95,000 Norway spruce seedlings from a private vendor in central Pennsylvania.</p>
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>	<p>C</p>	<p>The Strategic Plan For State Forest Management (2010) and this FME’s retention policy include guidelines for these habitat features. These guidelines have also been integrated into revisions of each unit management plan.</p> <p>Importance of these habitat elements has been clearly stated in both <i>Strategic Plan</i> and in most recent UMPs. Field foresters interviewed during the audit are aware of these habitat elements and take pride in demonstrating trees marked for retention to protect such habitat components. Examples were evident in most field sites visited. See Policy ONR-DLF-2 Retention on State Forests: http://www.dec.ny.gov/lands/69658.html</p> <p>2019: More than half of the management activities on State Forests are through even aged management. Less than half of this management is for regenerating the stand. All regeneration harvests for even-aged management must meet the Program Policy ONR-DLF-2, Retention on State Forests. If there is a certain retention goal not met then reserve trees are allocated to meet the goal in the future.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p>	<p>C</p>	<p>More than half of the harvesting on state forests is even-aged and a number of examples were provided during site visits. See site notes. The FME has addressed this topic in detail and developed two relevant policies: ONR-DLF-2, Retention on State Forests and ONR-DLF-3, Clearcutting on State</p>

<p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		<p>Forests: http://www.dec.ny.gov/docs/lands_forests_pdf/policyclearcutting.pdf</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 	<p>C</p>	<p>Departures from opening sizes have not been requested.</p>
<p>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	<p>C</p>	<p>Risks of invasive species are articulated in both the <i>Strategic Plan</i> and in recently-prepared UMPs. The extent of invasive species in state forests varies among regions, but all regions have programs to identify, treat, and monitor key species. Interviews with the Section Chief revealed that DEC has promoted the “Competing Vegetation Program” by supporting staff to maintain and gain their pesticide applicators license with the goal of conducting spot treatments for invasive species. Also, DEC has a newly formed Bureau of Invasive Species and Ecosystem Health which continues to monitor and control the establishment and spread of exotic and invasive species. The field audit visited a site on Stewart State Forest where a weevil has been used successfully to control mile-a-minute weed.</p>

		<p>2019: DEC has implemented and expanded our “Competing Vegetation Program” by supporting staff to maintain and gain their pesticide applicators license with the goal of conducting spot treatments for invasive species. Additionally, the DEC has a newly formed <i>Bureau of Invasive Species & Ecosystem Health</i> which continues to monitor and control the establishment and spread of exotic and invasive species. Bureau ISEH is here, http://www.dec.ny.gov/animals/265.html.</p>
<p>6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	<p>C</p>	<p>Prescribed burning is used occasionally on state forests, most often to maintain openings for wildlife. A burn permit is required. Wildfires are not common, but when they do occur BFRM is equipped to participate in suppression. For example, during the 2016 audit the audit team visited Roosa Gap SF to view recovery from a large wildfire in 2015. The fire burned mostly in a pitch pine-chestnut oak forest, a fire-dependent community.</p> <p>2019: None reported for 2018.</p>
<p>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	<p>NE</p>	
<p>6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</p>	<p>NE</p>	
<p>6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	<p>NE</p>	
<p>6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an</p>	<p>NE</p>	

<p>environmentally appropriate manner at off-site locations.</p>		
<p>6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</p>	NE	
<p>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p>	C	
<p>6.9.a The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p>	C	<p>Planting is not widely used for regeneration. The state nursery provides planting materials that are from local sources when supplemental planting is the preferred option. Norway spruce is planted in limited quantities. Managers have determined through experience and document review that this species is considered non-invasive in this landscape.</p>
<p>6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.</p>	C	<p>Planting stock is acquired from the state nursery, including provenance. Success of planting and any evidence of invasion are monitored during the inventory process.</p> <p>2019: During the summer of 2016 DEC enlisted an intern to conduct a European literature search of scientific research on Norway spruce. The goal of the research was to address the ability of State Forests to successfully naturally regenerate spruce on State Forests.</p>
<p>6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species</p>	C	<p>BFRM’s Plantation Policy (<i>Strategic Plan</i>) is to move away from planting for regeneration, but Norway spruce has been successful on some sites where natural regeneration is not adequate for successful restocking.</p> <p>Several spruce harvests with planned shift to native species were visiting during the 2019 audit. See site notes.</p> <p>Monitoring is conducted on a case-by-case basis with staff assigned to State Forest Management. State-wide monitoring and control of invasive, exotic species is conducted by the newly formed Bureau of Invasive Species & Ecosystem Health.</p>
<p>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</p>	NE	

<p>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p>		
<p>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>7.1. The management plan and supporting documents shall provide:</p> <p>a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</p> <p>i) Description and justification of harvesting techniques and equipment to be used.</p>	<p>NE</p>	
<p>7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>	<p>C</p>	
<p>7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.</p>	<p>C (OBS)</p>	<p>See Observation 2019.3 for detail.</p>

<p>7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</p>	<p>NE</p>	
<p>7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</p>	<p>NE</p>	
<p>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts. <i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p>8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p>	<p>NE</p>	
<p>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</p>	<p>C</p>	
<p>8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	<p>C</p>	<p>As confirmed through review of the SFID database and interviews itemized elsewhere in this report, this FME’s inventory includes items a-f.</p>
<p>8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	<p>C</p>	<p>Special monitoring has been undertaken in recent years to assess levels of damage from wind storms and floods. Likewise, monitoring in being carried out for several exotic insect pests and diseases. Intensive monitoring is being done for Emerald Ash Borer with pre-salvage and salvage harvests resulting, see site notes.</p>
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	<p>BFRM maintains records of harvest volume, product, species and acreage. Summary reports are generated each quarter and were inspected during the audit.</p>
<p>8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p>	<p>C</p>	<p>Data associated with RTEs is primarily completed by Natural Heritage Program staff with assistance from</p>

<ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their <i>habitats</i>; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4). 		<p>foresters and are supplemented by Natural Heritage Program’s existing data. This data provides one method to identify historic locations of RTE species. Secondly, workshops have been designed and implemented to train forest management staff to supplement these inventories with the aid of predictive species overlays. Evidence that these methods of data acquisition have been implemented include:</p> <ol style="list-style-type: none"> 1. For example RTE lists are contained in Appendix B of each Unit Management Plan. 2. For example common and rare plant communities are described in included in The Strategic Plan for SF Management (2010) p. 45-78 and in a sample of UMPs examined during the 2019 audit. 3. Invasive species are itemized in the Strategic Plan for SF Management (2010) p. 275-288. 4. Resource maps that include HCVF delineations have been distributed to each region and observed in regions 3, 4, and 7 during the 2019 audit. 5. Foresters and NHP maintain a list of sites and visit sites classified as HCVF in an effort to monitor changes. <p>Data associated with RTEs is primarily gathered by Natural Heritage Program staff with assistance from foresters who have received training in recent workshops. Interview with Natural Heritage staff confirmed trainings. Trainings also confirmed by documentation of agendas with dates and topics covered. The Bureau of Wildlife conducts assessments of vertebrate species, with emphasis on RTE and game species. Rare plant communities are monitored by NHP; forest types by BFRM.</p> <p>Invasive species are monitored, as needed, on a regional basis, mostly as a product of the extensive field work done by foresters.</p>
<p>8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	<p>C</p>	<p>Foresters normally visit harvesting sites 1-2 times/week to monitor compliance with harvest plans and conditions of the Notice of Sale.</p>
<p>8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	<p>C</p>	<p>The Operations Division of DEC maintains most roads on state forests and keeps records in a GIS data layer. UMPs provide an accounting of roads, needs for improvements, and plans for additional</p>

		roads. Many roads in State Forests are town or county roads.
8.2.d.3 The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	<p>This FME completed studies related to socio-economic values of forests including the Department published the Statewide Forest Resources Assessment & Strategy (2010) and “New York State Industrial Timber Harvest Production and Consumption Report-2011”.</p> <p>BFRM periodically contracts for studies of socio-economic impacts, and also has utilization and marketing specialists on staff. As a public agency, numerous branches of government monitor some elements of this indicator.</p>
8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.	C	<p>BFRM conducts formal outreach to stakeholders as UMPs and <i>Strategic Plans</i> are prepared and revised. They also do so when new policies, e.g., extraction for natural gas, are developed and debated. Stakeholders are invited to visit regional offices, phone, or send email messages.</p>
8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	<p>Sites of tribal significance are not known to occur on state forests (interview with David Witt), although tribal representatives are regularly invited to comment on management plans and their revisions.</p>
8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	<p>As confirmed through the review of quarterly reports and the annual total harvest.xls spreadsheet and individual contracts itemized elsewhere in this report, this FME maintains records including for example harvest volume, product, species and acreage. The cost of management is monitored as described during interviews with Rob Messenger. The information that has been collected is sufficient and has been used to assess productivity and efficiency of harvest projects.</p> <p>According to this data, a large number of small (local sale) projects are administered in some regions by this FME; based on the FMEs analysis, these small local sale projects are not as efficient or productive as larger projects due to the high level of administrative overhead. These smaller sales yield a much lower value per unit of volume. While the completion of some small sale projects is desirable for a variety of reasons including but not limited to conformance with indicator 5.2.c, an increase in the proportion of longer-term (usually larger) contracts and the resulting decrease in the proportion of short-term (usually smaller) contracts in some</p>

		<p>regions may be a desired approach for this FME during these challenging economic times. Interviews conducted during this audit confirm that this FME has submitted a proposal to the state legislature that will increase the current small/local Timber sale contract cap to \$50,000 from \$10,000. If approved, this change will mean that the comptroller's office will no longer need to approve timber harvest contracts that are less than \$50,000. This approval process will require a change to state law for revenue sales but will significantly enhance and speed up the process for timber sale contract approval.</p> <p>As confirmed through the review of quarterly reports and the annual total harvest.xls spreadsheet and individual contracts itemized elsewhere in this report, this FME maintains records including for example harvest volume, product, species and acreage. The cost of management is monitored as described during interviews with Rob Messenger. The information that has been collected is sufficient and has been used to assess productivity and efficiency of harvest projects.</p> <p>As a public agency, costs and revenues are carefully monitored. Summary statistics are found on the DEC web pages.</p>
<p>8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</p>	<p>NE</p>	
<p>8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</p>	<p>NE</p>	
<p>8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</p>	<p>NE</p>	
<p>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p>		
<p>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>C</p>	

<p>9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	<p>C</p>	<p>The initial HCVF assessment was completed as part of the NY DEC’s Strategic Plan for State Forest Management (2010), which is reviewed every 10 years. This data was updated in 2016.</p> <p>The FME maps HCVF acres in GIS and provided auditors with printed maps with HCVFs clearly identified, as was reconfirmed in 2019. Many of the acres protected as HCVF are located within the Adirondack and Catskills Forest Preserve owned and managed by the FME (almost 3 million acres). However, the Adirondack and Catskills Forest Preserve is not part of the certified acreage. Other acreages located within the State Forests are identified as RSAs and also included in the mapped HCVF acreage.</p> <p>Stands that are older than 140 years old are rare in the state of New York (less than 1% of the state’s forest resource). Documented old growth has been designated as HCVF. In addition, the preserve status of the FME’s Adirondack and Catskill Forest Preserves, where commercial harvesting is not permitted, have the greatest potential to develop late succession forest characteristics. Although Adirondack Forest Preserve and Catskill Forest Preserve are not covered under the scope of this certificate, it is managed by the state of New York and as such represents 2,864,549 acres contributing towards HCVF, OG, and RSAs goals, objectives, and targets.</p>
<p>9.1.b In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.</p>	<p>C</p>	<p>The 2010 and 2016 HCVF assessments were conducted in cooperation with the New York Natural Heritage Program, a partnership between the NY DEC and the State University of New York College of Environmental Science and Forestry. The Natural Heritage Program is staffed by ecologists, zoologists, and botanists, among other qualified specialists.</p>
<p>9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.</p>	<p>C</p>	<p>The complete Strategic Plan for State Forest Management, which outlines the assessment that included HCVF identification, is available on the agency website in an easily accessible location.</p>
<p>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	<p>C</p>	
<p>9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been</p>	<p>C</p>	<p>The FME consulted The Nature Conservancy, Natural Heritage Program, and other experts and stakeholders in the development of the Strategic</p>

<p>accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.</p>		<p>Plan for State Forest Management. Consultation included confirming the location, attributes, and accuracy of HCVFs. As part of monitoring HCVFs, Natural Heritage Program staff visit HCVF locations to confirm maintenance of HCV attributes.</p>
<p>9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.</p>	<p>C</p>	<p>The development of the Strategic Plan for State Forest Management included public review. The plan includes a summary of substantive revisions and responses to public comments, including elements of HCVFs.</p>
<p>9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	<p>C</p>	
<p>9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>	<p>C</p>	<p>Management and operational plans reviewed by auditors included measures to ensure the maintenance and/or enhancement of conservation values in HCVF areas. Protection measures for RTE species, RSAs, watershed protection zones, and rare communities were clearly identified on a sample of maps provided by the regions. Sampled sites confirmed that sufficient protection measures for HCVFs are implemented.</p>
<p>9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.</p>	<p>C</p>	<p>The Natural Heritage Program has written guidelines for managing selected natural communities. These guidelines are referenced by foresters along with the GIS HCVF-related data layers when planning timber harvests. Several examples of the implementation of HCV-protection measures were observed in the field.</p>
<p>9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.</p>	<p>C</p>	<p>Each unit management plan describes the adjacent land and existing uses, including management activities. While HCV attributes often cross ownership boundaries, no examples of coordinated management across property boundaries were presented or reviewed.</p>
<p>9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	<p>C</p>	
<p>9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program</p>	<p>C</p>	<p>Interviews with NY DEC staff and visual examination of GIS databases confirmed that regular monitoring of HCV attributes occurs by the FME and other DEC bureaus. Results are documented and recorded in relevant GIS HCVF data layers. The GIS data layers</p>

is designed and implemented consistent with the requirements of Principle 8.		and recent relational database records of monitoring were demonstrated for the audit team during this audit program.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	Management actions related to HCV attributes were reviewed. None were associated with increasing risk.
<p>Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</p> <p>Principle 10 is determined by the audit team to be not applicable to the evaluation of the FME as the type of silviculture practiced on the state forestlands, and the forest conditions that result from these practices, do not meet the FSC definition of “plantation forest management.”</p>		

Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table

Chain of Custody indicators were not evaluated during this evaluation.

Appendix 7 – Trademark Standard Conformance Table

Insert TRADEMARK CONFORMANCE TABLE if evaluated

Appendix 8 – Group Management Program

Group management is not within the scope of this certification.