



RA-Cert Division Headquarters
65 Millet St. Suite 201
Richmond, VT 05477 USA
Tel: 802-434-5491
Fax: 802-434-3116
www.rainforest-alliance.org

Audit Managed by:
United States Regional Office
801 Highway 3 North, Suite 201
Northfield, MN 55057
Tel: 507.663.1115
Fax: 507.663.7771
Contact person: Kara Wires, Forestry
Technical Specialist
Email: kwires@ra.org



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Forest Management **2013 Annual audit** Report for:

Commonwealth of
Pennsylvania, DCNR
Bureau of Forestry
In
Harrisburg, PA USA

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Audit Team:	Stephen C. Grado C. Reed Rossell, Jr.
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Organization Contact: Address:	Chad R. Voorhees Forest Resource Planner RCSOB 400 Market St. P.O. Box 8552 Harrisburg, PA 17105- 8552

TABLE OF CONTENTS

1. INTRODUCTION	3
2. AUDIT FINDINGS AND RESULTS	3
2.1. AUDIT CONCLUSION.....	3
2.2. CHANGES IN FMEs' FOREST MANAGEMENT AND ASSOCIATED EFFECTS ON CONFORMANCE TO STANDARD REQUIREMENTS:.....	4
2.3. EXCISION OF AREAS FROM THE SCOPE OF CERTIFICATE.....	4
2.4. STAKEHOLDER ISSUES (<i>COMPLAINTS/DISPUTES RAISED BY STAKEHOLDERS TO FME OR RAINFOREST ALLIANCE SINCE PREVIOUS EVALUATION</i>):.....	4
2.5. CONFORMANCE WITH APPLICABLE NONCONFORMITY REPORTS	7
2.6. NEW NONCONFORMITY REPORTS ISSUED AS A RESULT OF THIS AUDIT	7
2.7. AUDIT OBSERVATIONS	8
3. AUDIT PROCESS	8
3.1. AUDITORS AND QUALIFICATIONS:.....	8
3.2. AUDIT SCHEDULE	9
3.3. SAMPLING METHODOLOGY:.....	10
3.4. STAKEHOLDER CONSULTATION PROCESS	10
3.5. CHANGES TO CERTIFICATION STANDARDS.....	11
3.6. REVIEW OF FME DOCUMENTATION AND REQUIRED RECORDS	12
APPENDIX I: FSC Annual Audit Reporting Form:.....	13
APPENDIX II: List of visited sites (confidential)	16
APPENDIX III: List of stakeholders consulted (confidential)	19
APPENDIX IV: Forest management standard conformance (confidential)	26
APPENDIX V: Chain-of-Custody Conformance (confidential)	46
APPENDIX VI: Rainforest Alliance Database Update Form	51

Standard Conversions
1 mbf = 5.1 m ³
1 cord = 2.55 m ³
1 gallon (US) = 3.78541 liters
1 inch = 2.54 cm
1 foot = 0.3048 m
1 yard = 0.9144 m
1 mile = 1.60934 km
1 acre = 0.404687 hectares
1 pound = 0.4536 kg
1 US ton = 907.185 kg
1 UK ton = 1016.047 kg

1. INTRODUCTION

The purpose of this report is to document annual audit conformance of Commonwealth of Pennsylvania, DCNR Bureau of Forestry (BOF), hereafter referred to as Forest Management Enterprise (FME). The report presents the findings of Rainforest Alliance auditors who have evaluated company systems and performance against the Forest Stewardship Council™ (FSC®) forest management standards and policies. Section 2 of this report provides the audit conclusions and any necessary follow-up actions by the company through nonconformity reports.

The Rainforest Alliance founded its previous SmartWood program in 1989 to certify responsible forestry practices and has grown to provide a variety of auditing services. Rainforest Alliance certification and auditing services are managed and implemented within its RA-Cert Division. All related personnel responsible for audit design, evaluation, and certification/verification/validation decisions are under the purview of the RA-Cert Division, hereafter referred to as Rainforest Alliance or RA.

This report includes information which will become public information. Sections 1-3 will be posted on the FSC web site according to FSC requirements. All appendices will remain confidential. A copy of the public summary of this report can be obtained on the FSC web site at <http://info.fsc.org/>.

Dispute resolution: If Rainforest Alliance clients encounter organizations or individuals having concerns or comments about Rainforest Alliance and our services, these parties are strongly encouraged to contact Rainforest Alliance regional or Headquarters offices directly (see contact information on report cover). Formal complaints or concerns should be sent in writing.

2. AUDIT FINDINGS AND RESULTS

2.1. Audit conclusion

Based on Company's conformance with FSC and Rainforest Alliance requirements, the audit team makes the following recommendation:	
<input checked="" type="checkbox"/>	Certification requirements <u>met</u>, certificate maintenance recommended Upon acceptance of NCR(s) issued below
<input type="checkbox"/>	Certification requirements <u>not met</u>:
Additional comments:	None
Issues identified as controversial or hard to evaluate.	Issues related to the abundance of white-tailed deer on the northern tier of Pennsylvania are highly controversial at this time. There is a divided stakeholder audience on this issue. No nonconformance was identified related to BOF management of deer; however, OBS 01/13 was issued related to stakeholder consultation. See Section 2.4 below for more details.

2.2. Changes in FMEs’ forest management and associated effects on conformance to standard requirements:

There were no changes in the FME’s forest management and no effects on conformance to standard requirements.

2.3 Excision of areas from the scope of certificate

Not applicable. Check this box if the FME has not excised areas from the FMU(s) included in the certificate scope as defined by FSC-POL-20-003. *(delete the rows below if not applicable)*

2.4. Stakeholder issues *(complaints/disputes raised by stakeholders to FME or Rainforest Alliance since previous evaluation):*

Stakeholder consultation activities were organized to give participants the opportunity to provide comments according to general categories of interest based upon the audit criteria. The table below summarizes issues identified by the Rainforest Alliance audit team with a brief discussion of each based upon specific interview and comments received by the auditors.

FSC Principle	Stakeholder Comments	Rainforest Alliance Response
P1: FSC Commitment and Legal Compliance	The DCNR BOF mentioned a petition initiated by the Sierra Club that was circulating concerning the National Park Service. The issue is how the NPS is using the Land and Water Conservation Fund. The concern is that no funds are forthcoming to acquire lands to replace oil and gas development lands. The PA DCNR BOF is aware that it could be drawn into this issue. Several stakeholders mentioned this to the auditors as being a potential future issue relative to the PA DCNR.	Currently, this has not risen to the level of an issue for the FME.
P2: Tenure & Use Rights & Responsibilities	No comments received.	No response needed.
P3 – Indigenous Peoples’ Rights	No comments received.	No response needed.
P4: Community Relations & Workers’ Rights	Stakeholders acknowledged that not all social concerns can be addressed given budget constraints and competing interests on the land base (e.g., recreation and gas drilling). However, most stakeholders commented that the FME and its personnel show a genuine interest in trying to address clientele concerns (e.g., those of recreationists and adjacent landowners). It was also recognized that political influences	No response needed.

	<p>are also a reality for any public agency.</p> <p>During the current audit, through stakeholder auditor contacts and auditor analysis of stakeholder lists provided by the Bureau of Forestry, it was determined that opportunity for public input was limited in some cases. Numerous comments were received by stakeholders indicating the BOF was engaged in credible forest management. However, there were some who indicated a less than satisfactory opinion. Certain groups (e.g., hunting organizations or associations, some enterprises within the gas and oil industry, environmental groups) were not included within the advisory group construct or other lines of communication and thus felt they were missing opportunities to provide public inputs to management, planning, and operations.</p> <p>For the most part, forest workers expressed satisfaction with their positions.</p> <p>A number of advisory group members, those who were not BOF employees, were satisfied with the way the BOF was managing the forest.</p>	<p>The Rainforest Alliance is aware of the many ways in which inputs are transferred to the BOF. However, certain groups and individuals expressed concern they were not included more explicitly in advisory committees, outreach activities, and/or stakeholder lists. See OBS 01/13.</p> <p>No response needed.</p> <p>No response needed.</p>
<p>P5: Benefits from the Forest</p>	<p>Numerous wood products industries were contacted by the auditors and asked for feedback about their relationship with PA DCNR BOF. All purchased wood from the PA DCNR BOF. One company noted that little wood has recently come up for sale and they wish more were available. Most companies had a market for FSC certified wood and stated that purchasing FSC certified wood from the BOF was critical for their business.</p>	<p>No nonconformance with the FSC standard was identified.</p>
<p>P6: Environmental Impact</p>	<p>According to some stakeholders, some BOF Districts may not be aggressive enough in implementing the DMAP program in light of the fact that the PA Game Commission (PGC) has reduced license sales of antlerless deer permits in the past few years, which may result in increased</p>	<p>BOF Districts all conduct DMAP surveys to help determine impacts of deer browsing on forest regeneration. Survey results are then used by each District to justify if a District needs to be enrolled in the DMAP program and how many coupons it should request from PGC. A BOF committee reviews</p>

	<p>browsing impacts on State Forests. Others have claimed that ecological factors in the State Forests do not warrant the use of the DMAP program or at least not to the extent it is currently being used.</p> <p>Acid rain, and not deer browsing, is the primary cause of poor regeneration across State Forests, particularly in the northern tier of Pennsylvania.</p> <p>BOF inappropriately tries to regenerate northern hardwood stands into Oak-Hickory stands.</p> <p>BOF practices good forestry and manages harvest levels in a sustainable manner. BOF works hard to manage the State Forests, so that there is a diversity of successional stages and a balanced age-class distribution.</p>	<p>each District's justification related to the DMAP program to ensure that Districts are adequately utilizing the DMAP program. No nonconformance with the FSC standard was identified.</p> <p>The Rainforest Alliance recognizes that acid deposition is potentially one factor that may be affecting forest regeneration. However, auditors observed numerous stands that contained both open areas and areas with deer exclosures, including some in the northern tier, and it was quite obvious that deer browsing is having a marked impact on forest regeneration. No nonconformance with the FSC standard was identified.</p> <p>BOF Foresters indicated that they rely on natural regeneration whenever possible, and they do not convert stand types. Foresters also consistently stated that they manage a stand based on what the site conditions and forest type dictates. Observations made by the auditors support these assertions. No nonconformance with the FSC standard was identified.</p> <p>No response needed.</p>
<p>P7: Management Plan</p>	<p>Some stakeholders feel there is a lack of transparency in the development and revisions of the forest management plan [(i.e., the BOF State Forest Resource Management Plan (SFRMP)].</p>	<p>BOF's web site provides information on what goes into the SFRMP planning process. BOF provided numerous examples of ways stakeholders and the general public can provide comments before and after the draft SFRMP is developed. BOF has numerous advisory committees made up of a variety of stakeholder groups which provide input into the draft SFRMP. BOF holds numerous public meetings regarding the draft SFRMP across the state that are advertised by press releases. Public comments also can be posted on BOF's web site, by telephone, or by visits to the District Forest offices. BOF has a</p>

		communications section that is dedicated to documenting and summarizing public comments which are then considered in the development of the SFRMP. No nonconformance with the FSC standard was identified.
P8: Monitoring & Assessment	BOF is doing a good job monitoring the impacts related to gas and oil development, and should continue its efforts as more development occurs on the forests.	BOF has recently hired additional staff members for monitoring gas impacts and activities.
P9: Maintenance of High Conservation Value Forest	BOF has done a good job soliciting stakeholder input on the designation of HCFVs. BOF also has appropriately designated HCFVs and is adequately protecting them.	No response needed.
P10 - Plantations	Not Applicable	Not Applicable

2.5. Conformance with applicable nonconformity reports

The section below describes the activities of the certificate holder to address each applicable nonconformity report (NCR) issued during previous evaluations. For each NCR a finding is presented along with a description of its current status using the following categories. Failure to meet NCRs will result in nonconformances being upgraded from minor to major status with conformance required within 3 months with risk of suspension or termination of the Rainforest Alliance certificate if Major NCRs are not met. The following classification is used to indicate the status of the NCR:

Status Categories	Explanation
Closed	Operation has successfully met the NCR.
Open	Operation has either <u>not met</u> or has <u>partially met</u> the NCR.

Check if N/A (there are no open NCRs to review)

2.6. New nonconformity reports issued as a result of this audit

Check if N/A (there are no new NCRs issued as a result of this audit)

NCR#:	01/13	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-US National Forest Stewardship Standard Version 1.0, 6.1.a.			
Report Section:	Appendix IV			
Description of Nonconformance and Related Evidence:				
The Bureau of Forestry has a policy that Environmental Reviews, which include a PNDI search, will be conducted for all types of projects that will disrupt or alter the environment, such as impacts related to surface mining, oil and gas leasing, or new trail construction. During the visit to District 10 (Sproul State Forest), auditors examined impacts related to the annual Brandywine Enduro motorcycle race. Although observations indicated that the impacts on the forest from the race may be relatively minor, the District Forester indicated that an Environmental Review or a PNDI search had not been conducted for new sections of the course that were located in undisturbed portions of the forest, where there was potential for a state-				

listed plant species to occur.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.
Timeline for Conformance:	Prior to next annual audit
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	None

2.7. Audit observations

Observations can be raised when issues or the early stages of a problem are identified which does not of itself constitute a nonconformance, but which the auditor considers may lead to a future nonconformance if not addressed by the client. An observation may be a warning signal on a particular issue that, if not addressed, could turn into a NCR in the future (or a pre-condition or condition during a 5 year re-assessment).

OBS 01/13	Reference Standard & Requirement: FSC-US National Forest Stewardship Standard V1.0, 4.4.d
During the current audit, through stakeholder auditor contacts and auditor analysis of stakeholder lists provided by the Bureau of Forestry, it was determined that certain groups and individuals were not made aware of programs and activities where public inputs were being requested by the Bureau of Forestry. For example, certain groups (e.g., hunting organizations or associations, some enterprises within the gas and oil industry) were not included within the advisory group construct and thus felt they were missing opportunities to provide public inputs to management, planning, and operations.	
<p>Observation The PA DCNR BOF should ensure:</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>	

OBS 02/13	Reference Standard & Requirement: FSC-US National Forest Stewardship Standard V1.0, 8.2.d.1
Silviculture Section Chief indicated that regeneration surveys after harvests have been discontinued. However, it was unclear whether all stands are routinely visited by field foresters after harvests to ensure that adequate regeneration has occurred.	
<p>Observation The PA DCNR BOF should ensure an inventory system is maintained that includes regeneration.</p>	

3. AUDIT PROCESS

3.1. Auditors and qualifications:

Auditor Name	Stephen C. Grado	Auditor role	Lead Auditor
Qualifications:	<p>Dr. Grado is a Society of American Foresters (SAF) Certified Forester/Forest Certification Auditor #1155 and Fellow, a Professor of Forestry, and the George L. Switzer Professor in the Department of Forestry at Mississippi State University. He received a Ph.D. in Forest Resources in 1992, a M.S. in Forest Resources and Operations Research in 1984, and a B.S. in Forest Science in 1979 at The Pennsylvania State University, State College, Pennsylvania. He also has a B.A. in Political Science from Villanova University near Philadelphia, Pennsylvania. Dr. Grado has served as a socio-economic assessor/auditor on 60 primarily Rainforest Alliance pre-assessments (1, lead; 3, team), assessments (12 lead, 20 team), USDA Forest Service Test Evaluations (2, SW team; 1, SGS team), and numerous annual field audits (16 lead, 5 team; 1 SFI team). In addition, he has served as an assessor/auditor for innumerable Rainforest Alliance chain-of-custody assessments/audits, and also served as a peer reviewer for numerous FSC certification FM/COC assessment reports. Dr. Grado is also certified to the ISO 9001:2008 standard for Quality Management Systems for Lead Auditors.</p>		
Auditor Name	C. Reed Rossell, Jr.	Auditor role	Wildlife Ecologist
Qualifications:	<p>Education: A.A.S in Wildlife, Hocking Technical College; B.S. in Wildlife Ecology & Management, West Virginia University; M.S. in Wildlife Ecology, University of New Hampshire. Experience: Reed has worked in the field of wildlife ecology, management and research for over 20 years. He is a certified Wildlife Biologist and author or co-author of 26 peer-reviewed articles on wildlife ecology and management. Reed is an independent contract biologist and a research associate in the Department of Environmental Studies at the University of North Carolina at Asheville. He has worked as an FSC Forest Management auditor (ecologist) since 2001. He completed the FSC Lead Auditor Training in 2008, FSC CoC training in 2009, and ISO 9001 Quality Management Systems training in 2010. Reed has participated in 41 Forest Management certification assessments and audits throughout the Appalachian, Lake States, Mississippi Alluvial Valley, Northeast, Ozark-Ouachita, Pacific Coast, and Southeast regions.</p>		

3.2. Audit schedule

Date	Location /Main sites	Principal Activities
7/24/12-8/25/12	Off-site	Stakeholder notification sent out. Auditor review of FME information and documents provided by the Rainforest Alliance related to the annual audit. Transfer of documents to the auditor from the FME. Communications between the auditors and various stakeholders.
8/28/12	FME Main Office Harrisburg, Pennsylvania	Opening meeting, review of progress on OBSs (there were no open NCRs), Chain-of-Custody, FME records, and other documents.
8/28/12	District #6, Gallitzin State Forest, Pennsylvania	Brief meeting at the Babcock Maintenance Headquarters. Review of field conformance with FSC-US Standard. Interviews with FME employees and various stakeholders.
8/29/12	District #8, Clear Creek	Review of field conformance with FSC-US Standard.

	State Forest, Pennsylvania	Interviews with FME employees and various stakeholders.
8/29/12	District #14, Sproul State Forest, Pennsylvania	Review of field conformance with FSC-US Standard. Interviews with FME employees and various stakeholders.
8/30/12	FME Main Office Harrisburg, Pennsylvania	Interviews with FME employees and various stakeholders. Closing meeting, tentative findings on annual audit conformance, and further collection of documents, records, and other associated information by the auditors.
8/31/12- 9/22/12	Off-site	Follow-up information and document review and stakeholder consultation, exchange of documents via e-mail between FME employees and the auditors.
Total number of person days used for the audit:11 = number of auditors participating 2Xaverage number of days spent in preparation, on site and post site visit follow-up including stakeholder consultation5.5		

3.3. Sampling methodology:

Each year, the Rainforest Alliance has a goal of sampling at least three State Forest Districts. For the current audit, three Districts were sampled in western and Central Pennsylvania which included Districts 6 (Galitzen), 8 (Clear Creek), and 10 (Sproul). Galitzen and Clear Creek State Forest Districts had been visited for an annual audit since the last full assessment. The Districts included a range of sites including High Conservation Value Forest areas, recreational trails, timber harvest sites and other silvicultural activities, fenced and non-fenced forest stands, activities associated with reclaimed strip mine areas, Natural Areas, and a number of watersheds. During the audit 20 sites were visited.

Many sites within each District were chosen in response to stakeholder concerns about the forest and other resources (e.g., white-tailed deer populations and impacts to the forest, Enduro Trail impacts). Also, within each District the sampling process included a range of forest types, harvest methods, regeneration strategies, and species diversity. Active or recently completed harvests were selected to evaluate current impacts to soils, water, and existing vegetation, while closed harvests were sampled to observe longer-term impacts on resources and the amount of forest regeneration. Proximity to water courses was also a priority in selecting sites.

3.4. Stakeholder consultation process

The purpose of the stakeholder consultation strategy for this annual audit was threefold:

1. To ensure that the public is aware of and informed about the audit process and its objectives;
2. To assist the field audit team in identifying potential issues; and,
3. To provide diverse opportunities for the public to discuss and act upon the audit findings.

This process is not just stakeholder notification, but wherever possible, a process to secure detailed and meaningful stakeholder interactions. Stakeholder interaction does not stop after the field visits, or for that matter, after even a certification decision is made. The Rainforest Alliance welcomes, at any time, comments on certified operations and such comments often provide a basis for field assessment.

Prior to the actual PA DCNR audit, a public consultation stakeholder notification document was developed by the Rainforest Alliance and distributed by e-mail to it won internal stakeholder list

(n=169) and to those PA DCNR stakeholders with e-mails on their own lists. On July 24, 2012, the Rainforest Alliance sent out an initial 30-day notification via e-mail alerting stakeholders to the upcoming PA DCNR annual audit to take place from August 28-30, 2012.

Prior to, and during, the audit, PA DCNR BOF staff were interviewed in the office and at field sites. The auditors also made a series of telephone calls to various individuals on the above lists and to others who the auditor knew would be familiar with this FME. The Lead auditor also resent the stakeholder notification and a request for inputs on PA DCNR BOF forest management after the field visit was completed. This was sent to all stakeholders with e-mail addresses on the PA DCNR BOF stakeholder lists. Consultation was undertaken via e-mail and/or telephone to provide additional evidence for evaluation of PA DCNR BOF to the FSC-US standard requirements. Specific comments provided to Rainforest Alliance or the auditors also were summarized and addressed as described in Section 2.4. These included e-mails and field review of several forested areas or other items with issues identified as concerns to stakeholders.

Stakeholder Type	Stakeholders Notified (#)	Stakeholders Consulted/Providing Input (#)
Academia	24	3
Citizens Natural Resource Advisory Committee	16	1
Ecosystem Management Advisory Committee	33	0
Environmental and Conservation NGOs	36	5
Federal and State Government	16	5
FME Employees	32	32
Forest Industry	102	8
Forestry and Forest Products NGOs	15	0
FSC US	7	0
Hunting Organizations and Associations	3	3
Natural Gas Advisory Committee	18	0
Gas and Oil Companies	15	2
Other	33	0
Private Citizens	1	1
Rainforest Alliance	6	0
Regeneration Contractors	4	0
Snowmobile Advisory Committee	19	1
Strategic Advisory Committee	33	0
Vascular Plant Technical Committee	26	1

3.5. Changes to Certification Standards

Forest stewardship standard used in audit:	FSC-US Forest Management Standard (v1.0)
Revisions to the standard since the last audit:	<input checked="" type="checkbox"/> No changes to standard. <input type="checkbox"/> Standard was changed (detail changes below)
Changes in standard:	None
Implications for FME:	Not applicable - no new requirements

3.6. Review of FME Documentation and required records

a) All certificate types

Required Records	Reviewed
Complaints received by FME from stakeholders, actions taken, follow up communication	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: A list of complaints received by the FME from stakeholders that may or may not impact forest operations were provided to the auditors.	
Accident records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: A list of accidents or injuries incurred by FME employees and lists of reportable accidents or injuries for various activities (e.g., ATV-related incidents) were provided to the auditors.	
Training records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: A set of forms used to document training, as well as training sessions since the last audit were provided to the auditors.	
Operational plan(s) for next twelve months	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: Operational plans for the next 12 months were reviewed during this audit. The majority of the plans were future timber harvests which are goals established by the FME's Harvest Allocation model. There are no 12 month plans for most other operations.	
Inventory records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: The FME's latest inventory records were provided to the auditors.	
Harvesting records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: FME's Forest Products Statistical Report 2011 details harvest records and products sold during that year.	

APPENDIX I: FSC Annual Audit Reporting Form:

Forest management enterprise information:			
FME legal name:	Commonwealth of Pennsylvania, DCNR, Bureau of Forestry		
FME Certificate Code:	SW-FM/CoC – 003821		
Reporting period	Previous 12 month period	Dates	August 2011-August 2012

1. Scope Of Certificate	
Type of certificate: single FMU	SLIMF Certificate: not applicable
New FMUs added since previous evaluation	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

2. FME Information	
<input type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)	
Forest zone	Temperate
Certified Area under Forest Type	
- Natural	865,476 hectares
- Plantation	hectares
Stream sides and water bodies	8543 Linear Kilometers

3. Forest Area Classification	
<input type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)	
Total certified area (land base)	865476ha
1. Total forest area	865476ha
a. Total production forest area	765645ha
b. Total non-productive forest area (no harvesting)	99831ha
- Protected forest area (strict reserves)	ha
- Areas protected from timber harvesting and managed only for NTFPs or services	99831ha
- Remaining non-productive forest	ha
2. Total non-forest area (e.g., water bodies, wetlands, fields, rocky outcrops, etc.)	0ha

4. High Conservation Values identified via formal HCV assessment by the FME and respective areas			
<input checked="" type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)			
Note: Some areas are designated as more than one HCV so the area per HCV or category in each HCV do not necessarily add up to overall total.			
Code	HCV TYPES ¹	Description:	Area
HCV1	Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		ha
HCV2	Forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of		ha

¹The HCV classification and numbering follows the ProForest HCVF toolkit. The toolkit also provides additional explanation regarding the categories. Toolkit is available at <http://hcvnetwork.org/library/global-hcv-toolkits>.

	most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
HCV3	Forest areas that are in or contain rare, threatened or endangered ecosystems.		ha
HCV4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		ha
HCV5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		ha
HCV6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		ha
TOTAL HCVF AREA			ha
Number of sites significant to indigenous people and communities			125

5. Workers			
Number of workers including employees, part-time and seasonal workers:			
Total number of workers	734workers		
- Of total workers listed above	640 Male	94 Female	
Number of serious accidents	See PA DCNR Custom Injury Report		
Number of fatalities	0		

6. Pesticide Use			
<input type="checkbox"/> FME does not use pesticides. (delete rows below)			
FME has a valid FSC derogation for use of a highly hazardous pesticide			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Non FSC highly hazardous pesticides used in last calendar year			
Name	Quantity (liters)	# of Hectares Treated	
Glyphosate: N-(phosphonomethyl) glycine, isopropylamine salt	2600	29ha	
Sulfometuron methyl {Methyl 2-[[[(4, 6-dimethyl-2-pyrimidinyl) amino]-carbonyl] amino] sulfony] benzoate}	2356	26ha	
Glyphosate: N-(phosphonomethyl) glycine, dimethylamine salt	2308	232ha	
Glyphosate, isopropylamine salt	980	2ha	
Triclopyr	784	63ha	
Sethoxydim: 2-[1-(ethoxyimino) butyl-5-[2-(ethylthio) propyl]-3-hydroxy-2-cyclohexen-1-one	542	3ha	
Glyphosate, N-(phosphonomethyl) glycine, isopropylamine salt	299	2ha	
Aliphatic based petroleum oil	204	226ha	
Isopropylamine salt of Imazapyr (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-pyridinecarboxylic acid)	204	226ha	
Sethoxydim: 2-[1-(ethoxyimino) butyl]-5-[2-(ethylthio) propyl]-3-hydroxy-2-cyclohexen-1-one	173	1ha	
Glyphosate: N (phosphonomethyl) glycine,	117	1ha	

dimethylamine salt		
Sethoxydim: 2-[1-(ethoxylmino) butyl]-5-[2-(ethylthio) propyl]-3-hydroxy-2-cyclohexen-1-one	93	1ha
Metsulfuron methyl	61	1ha
Glyphosate	53	0ha
Sethoxydim: 2-[1-(ethoxyimino) butyl]-5-[2-(ethylthio) propyl]-3-hydroxy-2-cyclohexen-1-one	38	0ha
Alkylarylpolyoxykane ether, isopropanol and free fatty acids	30	7ha
Glyphosate, N-(phosphonomethyl)glycine, isoproplamine salt	8	0ha
Picloram: 4-amino-3, 5, 6-tricloropicolinic acid, potassium salt	2	2ha
Triclopyr: 3, 5, 6-tricloro-2-pyridinyloxy acid, butoxyethyl ester	2	2ha
Aminopyralid	0	4ha
Triclopyr: 3, 5, 6-tricloro-2-pyridinyloxy acid, triethylamine salt	0	4ha
Totals	10857	831ha

Note: Zero liters are due to a data entry backlog. The daily application log data (which includes liters applied) have not yet been entered into the system for projects using the listed chemicals. Liters applied are computed from the daily application log, which includes the application date(s), start/end times, applicator name(s), weather conditions, and gallons of solution applied for that period. This information is collected on-site during the actual application and entered into the system afterwards. Zero hectares are attributed to rounding.

APPENDIX II: List of visited sites (confidential)

FMU or other Location	Compartment/ Area	Site description / Audit Focus and Rationale for selection
District #6, Gallitzin State Forest	Ruffed Grouse/ Woodcock Habitat Project /14 acres	Viewed first year of a 5-year Ruffed Grouse/ Woodcock Habitat Project on 14 acres in collaboration with the Pennsylvania Game Commission. The goal was to annually cut aspen and shrubs to promote grouse and woodcock habitat and benefit non-game bird species.
District #6, Gallitzin State Forest	Project Oak Sale, Block 2, 06- 2007BC01 /46 acres	Project Oak Shelterwood on Block 2. A previous improvement cut in the 1980s. A 2008 oak shelterwood sale that was fenced. High-quality site with abundant oak and poplar regeneration, with some oak mortality. Shelterwood residual basal area target of 110 sq.ft./acre.
District #6, Gallitzin State Forest	Brian and Marge Sale, Block 1, 06- 2010BC04/23 acres	Retired beech salvage sale. Other valuable hardwoods maintained on-site. Sprayed for ferns. To be left as an unfenced area, and monitored for deer browsing impact. Will be fenced if needed. Supplemental black cherry tree planting. Clear boundary markings.
District #6, Gallitzin State Forest	Clear Shade Wild Area/2,791 acres	A black cherry, beech, and maple forest that includes Clear Shade Creek which is a native trout stream. Contains Fisherman's Path and the 5-mile loop John P. Saylor Trail, used for hiking, biking, and cross country skiing.
District #6, Gallitzin State Forest	Big T Timber Sale Block 1, 06- 2010BC01/28 acres	A 2012 recently closed sale. Two oak shelterwood blocks and one black cherry block. Both oak blocks were fenced two weeks after harvest. Aiming for retention of 100 ft ² of basal area on the oak blocks. Some hauling and road work to be completed. There was a road buffer area in Block 1.
District #6, Gallitzin State Forest	Culvert and Road Work near 2010 Railroad Grade Sale	Culvert and road work on Exceptional Value (EV) stream which is a tributary to Clear Shade Creek. Non-motorized activities permitted over the creek which includes hiking, biking and horseback riding. Viewed abundant aquatic wildlife species in the tributary. Viewed portion of snowmobile trail on road entering sale site.
District #6, Gallitzin State Forest	Restored Pot Ridge Strip Mine HCVF/11 acres	Reclaimed strip mine area designated as a HCVF. The FME maintains the roads. Issues with autumn olive. The site was prescribed burned. A 2012 native warm season grass planting with a clover buffer on perimeter. Habitat for four avian species of concern. To be mowed or burned to maintain grassland habitat on an as needed basis. Consultation with universities, the Pennsylvania Game Commission, and a local Audubon Chapter. Site to be monitored.
District #6, Gallitzin State Forest	Restored Pot Ridge Strip Mine /9 acres	Reclaimed strip mine area designated as a HCVF. Goal is to create grassland habitat for avian species. Sprayed in 2011 to achieve autumn olive mortality; however, often requires two years of treatments. Locust on-site to be evaluated for removal. Site to be mowed.

District #6, Gallitzin State Forest	Restored Pot Ridge Strip Mine /over 100 acres	Reclaimed strip mine area designated as a HCVF. Northern Harrier and Henslow Sparrow habitat. Further habitat improvements require consultation with the Pennsylvania Department of Environmental Protection.
District #6, Gallitzin State Forest	Restored Pot Ridge Strip Mine/30 acres	Reclaimed strip mine area designated as a HCVF. Small ridge containing Upland Sandpiper habitat, adjoining the 30-acre site. The FME will split this area into 5 units to include a control area and combinations of warm and cold season grass seeding. Goal is to expand on current upland sandpiper habitat. Strategy is to mow and herbicide in the fall, then spring burn, and plant.
District #6, Gallitzin State Forest	Laurel Run Division Food Plot Areas, Shortline Plot/20 acres	Food plot for wildlife which included planted pears and apples. Old homestead adjoined the site. Residual apple trees kept on-site. Food plot was planted in an area near electric utility lines, which can't support taller trees. DMAP Assistance Area #1355. Nelson food plot viewed from a distance.
District #8, Clear Creek State Forest	500 Flat 2, Blocks 1-4/56 acres	Proposed shelterwood harvest and expansion of group openings in sale area. A 1999 shelterwood harvest and group selection in buffer. Fenced in 1999, with gas well fenced in 2002. Planted pitch pine and dog hobble in openings. Prescribed fire and mowing of mountain laurel in 2010. Herbicide spraying on cut black gum stumps. Prescribed fire in spring 2012. Two on-site regeneration plots visited once per year. Viewed SMZ along a perennial stream.
District #8, Clear Creek State Forest	Painter Sale, Blocks 1-3, 08-1998BC05 and 08-2009BC04/46 acres	Primarily an oak forest. Shelterwood harvest in 2001. Woven fence installed in 2001. Salvage from storm damage in 2003. Ferns sprayed in 2005. A 35 acre overstory removal completed in 2010 on Blocks 1 and 2. On-site regeneration plot buried on landing. Wildlife snags abound. SMZ along an Intermittent stream protected with structured forest cover. Block 3 (11 acres) left as a two-aged buffer zone.
District #8, Clear Creek State Forest	Windfall Run, 08-1991BC03 and 08-1999BC03/47 acres	Primarily a red oak site with a number of other hardwood species. A 1993 shelterwood harvest. Fenced in 1993 and again with woven fencing in 1998. A 2002 overstory removal on 35 acres, with 12 acres left as a buffer. On-site regeneration plot Good regeneration. USDA Forest Service research site. Light meters outside blocks for baseline data. 2012 fence removal.
District #8, Clear Creek State Forest	Jim Town 2/50 acres	Along Clear Run Road, with a gas line adjoining the road. Overstory removal harvest in 2005. Two-aged management in the buffer area. Area left managed near neighbors for aesthetics. No fencing.
District #10, Sproul State Forest	Rattlesnake Enduro Area	Brandywine Enduro Trail. A 2012 site with a ford on Sandy Run. Laden with stone as were the trails leading in and out of the ford.
District #10, Sproul State Forest	Rattlesnake Enduro Area	Brandywine Enduro Trail. A 2011 section of trail with access blocked with logs. Trail was raked in and seeded; similar to a skid road, but narrower.
District #10, Sproul	10-2009BC03/70	Shelterwood cut in 2005. A 56 acre overstory removal

State Forest	acres	in 2010 and a 14 acre 2-age buffer removal. This was an area considered for leaving out fencing. Fenced area that previously had a drive through access. Vandalism led to creation of flap access. Prior to fencing red maple outgrew the deer's ability to utilize it. Looking to treat red maple to promote oak species. A multitude of tree species were observed in the fenced area.
District #10, Sproul State Forest	Rattlesnake Enduro Area	Brandywine Enduro Trail. In the Paddy Run Watershed Area, classified as an area of Exceptional Value. A 2011 section of trail with access blocked with logs. Two foot wide trail. Trail course changed through inspection and re-inspection by Forester.
District #10, Sproul State Forest	Rattlesnake Enduro Area	Brandywine Enduro Trail just used in July 2012. Not yet restored. Overstocked red pine stand with a basal area of about 170 ft ² per acre. An uncommon stand on the State Forest. Access now blocked with logs.

APPENDIX III: List of stakeholders consulted (confidential)

List of FME Staff Consulted

Below are the list of stakeholders directly contacted during the on-site audit and those contacted by the audit team before, during, or after the visit and who provided feedback. All stakeholders lists associated with this FSC certification annual audit are maintained in the Rainforest Alliance U.S. Region Office (See Section 3.4 for details) and were not listed below due to their number.

List of other Stakeholders Consulted Name	Title	Contact	Type of Participation
Bodamer, Mark	PA DCNR-BOF, District #8, Clear Creek State Forest, Assistant District Forester	mbodamer@pa.gov	Field interview
Bowen, Rebecca	PA DCNR-BOF, Section Chief, Ecological Services	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 rebbowen@pa.gov	Opening meeting, field and office interviews, closing meeting
Briggs, Nate	PA DCNR-BOF, District #8, Clear Creek State Forest, Forest Technician	nbriggs@pa.gov	Field interview
Cassell, Seth	PA DCNR-BOF, Section Chief, Communications	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 717-783-0392 scassell@pa.gov	Opening meeting, e-mail contact, closing meeting
D'Amore, Doug	PA DCNR-BOF, District #10, Sproul State Forest, District Forester	ddamore@pa.gov	Field interview
Devlin, Dan	PA DCNR-BOF, State Forester	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 717-787-2105 ddevlin@pa.gov	Opening meeting, office interview, closing meeting
Eggen, Don	PA DCNR-BOF, Forest Health Manager	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 deggen@pa.gov	Opening meeting
Firestone, Chris	PA DCNR-BOF, Botanist, Ecological Services	570-724-8149 cfirestone@pa.gov	Field interview
Fitterling, Robert S.	PA DCNR-BOF, District #10, Sproul State Forest, Forester	rofitterli@pa.gov	Field interview

Gilbert, Carrie	PA DCNR-BOF, Botanist-Ecological Services	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 cagilbert@pa.gov	Field interview
Gilmore, Gary	PA DCNR-BOF, District #8, Clear Creek State Forest, District Forester	ggilmore@pa.gov	Field interview
Gundlach, Andy	PA DCNR-BOF, District #8, Clear Creek State Forest, Forest Technician	agundlach@pa.gov	Field interview
Haubrick, David	PA DCNR-BOF, District #8, Clear Creek State Forest, Program Specialist	dhaubrick@pa.gov	Field interview
Jones, Chris	PA DCNR-BOF, District #6, Gallitzin State Forest, Forester	chrijones@pa.gov	Field interview
Just, Emily	PA DCNR-BOF, Wildlife Ecologist-Ecological Services	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 emjust@pa.gov	Telephone interview
Keefer, Matt	PA DCNR-BOF, Assistant State Forester	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 717-214-3814 makeefer@pa.gov	Office and field interview, closing meeting
Lester, Mike	PA DCNR-BOF, Assistant State Forester- Forestry Services	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 717-783-7938 milester@pa.gov	Opening meeting, office interview, closing meeting
Long, John	PA DCNR-BOF, District #10, Sproul State Forest, Assistant District Forester	jtlong@pa.gov	Field interview
Maser, Mike	PA DCNR-BOF, District #6, Gallitzin State Forest, Assistant District Forester	mmase@pa.gov	Field interview
Miller, Scott	PA DCNR-BOF, Section Chief, Silviculture	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 scomiller@pa.gov	Opening meeting, field and office interviews
Moore, Chris	PA DCNR-BOF, District #10, Sproul State Forest, Forest Ranger	chrmoore@pa.gov	Field interview
Nelson, Mike	PA DCNR-BOF, District #6, Gallitzin State Forest, Forester	micnelson@pa.gov	Field interview

Petroski, Joe	PA DCNR-BOF, Section Chief, Geospatial Applications	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 jpetroski@pa.gov	Opening meeting, closing meeting
Plank, Chris	PA DCNR-BOF, Assistant State Forester	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 cplank@pa.gov	Closing meeting
Reyna, Rachel	PA DCNR-BOF, Section Chief, Rural and Community Forestry	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 rreyna@pa.gov	Office contact
Roeder, Zack	PA DCNR-BOF, Forest Resource Planner-Planning Section	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 zroeder@pa.gov	Opening meeting, field interview
Roth, Paul A.	PA DCNR-BOF, Section Chief, Resource Inventory & Monitoring	137 Penn Nursery Road Spring Mills, PA 16875-9621 814-364-5172 paroth@state.pa.us	Office interview, closing meeting
Salvato, Brian	PA DCNR-BOF, Silviculture Section, Program Specialist	bsalvato@pa.gov	Field interview
Schieb, Jake	PA DCNR-BOF, District #8, Clear Creek State Forest, Forester	jschieb@pa.gov	Field interview
Shultzaburger, Ellen	PA DCNR-BOF, Section Chief, Planning	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 eshultzaba@pa.gov	Opening meeting, e-mail contacts, field interview
Snyder, Dan	PA DCNR-BOF, District #6, Gallitzin State Forest, Forester	daniesnyder@pa.gov	Field interview
Sorgen, Dennis	PA DCNR-BOF, District #10, Sproul State Forest, Assistant District Forester	dsorgen@pa.gov	Field interview
Stauffer, Aura	PA DCNR-BOF, Wildlife Biologist	astauffer@pa.gov	Field interview
Stemmler, Terence	PA DCNR-BOF, District #6, Gallitzin State Forest, District Forester	155 Hillcrest Drive Ebensburg, PA 15931 814-472-1862 tstemmler@state.pa.us	Field interview
Swoger, Lee	PA DCNR-BOF, District #8, Clear Creek State Forest, Forester	lswoger@pa.gov	Field interview

Voorhees, Chad	PA DCNR-BOF, Forest Resource Planner-Planning Section	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 717-425-5368 chvorhees@pa.gov	Opening meeting, office and field interview, e-mail contacts, closing meeting
White, Randy	PA DCNR-BOF, Section Chief, Forest Fire Protection	Rachel Carson State Office P.O. Box 8552 Harrisburg, PA 17105-8552 ranwhite@pa.gov	Opening meeting

List of other Stakeholders Consulted

Name	Organization	Contact	Type of Participation	Follow -up Required ²
Ali, Rocco	CNR Advisory Committee Member	roca_1@excite.com	E-mail contact	None
Allison, Steve	North American Wood Products, LLC	7007 SW Cardinal Lane, Suite 135 Portland, Oregon 97224 503-620-6655 503-799-9008 stevea@nawpi.com	E-mail contact	None
Anonymous	Private citizen	Bellefonte, PA	E-mail contact	None
Bennett, Nathan S.	Anadarko Petroleum Corporation, Regulatory Manager	33 West 3rd Street, Suite 200 Williamsport, PA 17701 570-244-4045 570-932-0776 nathan.bennett@anadarko.com	E-mail contact, telephone interview (conference call)	None
Caruso, Mike	Matson Lumber Company, FSC Certification Coordinator	132 Main St Brookville, PA 15825 814-849-5334	Telephone interview	None
Clark, Arthur	Sierra Club Pennsylvania Chapter, Oil & Gas Committee Co-chair, At-large Delegate, Chapter Executive Committee	717-458-2029 fsck100@gmail.com	E-mail contacts, telephone interview	None

²To indicate if the stakeholder has requested documented follow up on how their comments were addressed during the evaluation. TM shall provide public summary to stakeholders that request documented follow-up within 3 months of the closing meeting.

Craig, Bert	Kane Hardwood Division of Collins Pine Company, General Manager	Box 807 Kane, PA 16735 814-837-6941	Telephone interview	None
Diefenbach, Duane	Wildlife Ecology, U.S. Geological Survey Pennsylvania Cooperative Fish and Wildlife Research Unit, Leader and Adjunct Professor	Pennsylvania State University 404 Forest Resources Bldg. University Park, PA 16802 814-865-3992 drd11@psu.edu ddiefenbach@psu.edu	E-mail contacts	None
Drohan, Patrick	Assistant Professor of Pedology, APSS Department of Ecosystem Science and Management	The Pennsylvania State University 452 ASI Building University Park, PA 16802-3504 814-863-4246 padrohan@psu.edu	Telephone interview	None
Durgin, Philip R.	Legislative Budget and Finance Committee, Executive Director	Finance Building, Room 400A P.O. Box 8737 Harrisburg, PA 17105- 8737 717-783-1600 pdurgin@lbfc.legis.state. pa.us	Office interview	None, unless he contacts RA and/or lead auditor for clarifications
Elliott, Lori	Executive Director Pennsylvania State Snowmobile Association, Snowmobile Advisory Committee	908 N. 2nd St. Harrisburg, PA 17102 717-41-6045 lori@wannerassoc.	E-mail contact	None
Ellis, Amy	Buehler Lumber Company	260 West Main St Ridgeway, PA 15853- 1611 814-776-1121	Telephone interview	None
Eveland, John	Coalition of Concerned Sportsmen, Technical Advisor	412-601-0077	Telephone interviews	None
Harrion, Brad	American Hardwoods Industries, LLC, Blue Triangle Hardwood, Yard Manager	567 North Charlotte Ave Waynesboro, VA 22980 540-941-1463	Telephone interview	None

Hickman, Dennis	Co-owner and President, Hickman Lumber	P.O. Box 130 501 Main Street Emlenton, PA 16373 800-867-9441	Face-to-Face interview	None
Iannantuno, Jack	Eastern Pennsylvania Firearms Coalition, Co-Chair (among other groups)	610-730-1464 jack@indiconinc.com	Telephone interviews, e-mails contacts	Telephone calls and e-mails
Isaac, Bonnie L.	Collection Manager, Section of Botany, Carnegie Museum of Natural History, Vascular Plant Technical Committee	4400 Forbes Ave. Pittsburgh, PA 15213 (412) 622-3253 IsaacB@CarnegieMNH.Org	E-mail contact	None
Johnson, Nels	The Nature Conservancy, Pennsylvania Deputy State Director	717.232.6001	Telephone interview	None
Levavasseur, John	Hancock Forest Management. Allegheny Area Manager	P.O. Box 3304 202 East Main St. Smethport, PA 16749 814-887-9135 814-251-4982 jlevavasseur@hnr.org	E-mail contact	None
Leventry, Justin N.	Governor's Advisory Council for Hunting, Fishing and Conservation, Governor's Sportmen's Liaison	Rachel Carson State Office P.O. Box 8767 Harrisburg, PA 17105-8767 717-772-9084 jleventry@pa.gov	Office interview	None, unless he contacts RA and/or lead auditor for clarifications
Lord, Bruce E.	Statistics Department, Assistant Professor	The Pennsylvania State University University Park, PA 16802 814-865-5212 bel@psu.edu	E-mail contacts	None
Martin, Chris	Anadarko Petroleum Corporation, Survey Land Manager for Pennsylvania and Ohio	33 West 3rd Street, Suite 200 Williamsport, PA 17701 chris.martin@anadarko.com	Telephone interview (conference call)	None
Martin, Richard	Pennsylvania Forest Coalition, Coordinator	forestcoalition@aol.com	E-mail contact	None

Nelson, Dave	Glatfelter Pulp Wood Company	228 South Main St Spring Grove, PA 17362-1000 717-225-4711	Telephone Interview	None
Rosenberry, Chris	Pennsylvania Game Commission, Supervisory Wildlife Biologist	2001 Elmerton Avenue Harrisburg, PA 17110 717-787-5529 chrosenber.pa.gov	Telephone interview	None
Santucci, Randy	Unified Sportsmen of Pennsylvania, President	412-760-1492	Telephone interview	None
Schmidt, Jeff	Director Sierra Club PA Chapter, Director	jeff.schmidt@sierraclub.org 717-232-0101	E-mail contacts	None
Stout, Susan L.	USDA Forest Service, Northern Research Station, Project Leader	335 National Forge Road, P.O. Box 267 Irvine, PA 16329 814-563-1040 sstout@fs.fed.us	E-mails contacts	None
Tzilkowski, Wally	Professor of Wildlife, Retired	wmt@psu.edu	E-mail contact	None
Wasserman, John	Pennsylvania Forest Coalition	Tamarack, PA john@johnwasserman.com	E-mail contact	None

APPENDIX IV: Forest management standard conformance (confidential)

The table below demonstrates conformance or nonconformance with the Forest Stewardship Standard used for evaluation as required by FSC. The Rainforest Alliance Task Manager should provide guidance on which sections of the standard should be evaluated in a particular audit. Rainforest Alliance may evaluate only a subset of the criteria or principles of the standard in any one particular audit provided that the FME is evaluated against the entire standard by the end of the certificate duration. Findings of conformance or nonconformance at the criterion level will be documented in the following table with a reference to an applicable NCR or OBS. The nonconformance and NCR is also summarized in a NCR table in Section 2.4. All nonconformances identified are described on the level of criterion though reference to the specific indicator shall be noted. Criteria not evaluated are identified with a NE.

P & C	Conformance: Yes/No/ NE/NA	Findings	NCR OBS (#)
Principle 1: COMPLIANCE WITH LAWS AND FSC PRINCIPLES			
1.1	Yes	<p>Under 1.1.a. The PA DCNR BOF was forth coming on outstanding complaints or investigations of important issues they are dealing with. There were no significant violations of any laws to report. There were three main items of concern:</p> <ol style="list-style-type: none"> 1. The Pennsylvania Legislative Budget and Finance Committee, a joint committee of The Pennsylvania General Assembly, is looking into the “The Costs and Benefits of FSC Certification of DCNR Forests.” This is a legal inquiry. 2. There is an issue related to the white-tailed deer and deer densities particularly in the northern tier of the state. There is a perception that the PA DCNR BOF is working with the Pennsylvania Game Commission to reduce the deer herd for a number of reasons, many unfounded. There are stakeholder issues relating to the DMAP program and the number of DMAP allocations requested by the PA DCNR BOF. As a result, there is an inquiry going on through a council titled the “Governor’s Advisory Council for Hunting, Fishing and Conservation” on the deer issue that has been referred to the Pennsylvania Game Commission and the PA DCNR BOF. 3. There is a petition initiated by the Sierra Club going around concerning the use of Land and Water Conservation Fund lands and oil and gas leasing. Currently, this is an issue with the National Park Service related to the Land and Water Conservation Funds and how implementation of oil and gas leases are considered takings when there is such a large conversion of land and no funds are forthcoming to the fund to acquire lands to replace oil and gas development lands. The PA DCNR BOF State Forests, in regard to the oil and gas activity, could be drawn into this issue in the future. The PA DCNR is aware of discussions in this regard. 	
1.2	NE		
1.3	Yes	<p>Under 1.3.a. FME complies with relevant provisions of all applicable binding international agreements. Violations, outstanding complaints, or investigations in which the FME was involved were provided to the Rainforest Alliance during the annual audit. There were three</p>	

		outstanding issues. See Indicator 1.1.a. There was an absence of evidence presented to, or otherwise brought to the attention of the auditors on any issues beyond those presented here.	
1.4	Yes	Under 1.4.a. There are no known situations where compliance with laws or regulations conflicts with FSC P&C compliance.	
1.5	Yes	Under 1.5.a. The FME currently has 34 full-time and 2 seasonal rangers employed specifically to prevent and mitigate illegal and unauthorized activities as well as provide for public safety through regular patrols. Additionally, the FME provides training for personnel classified as State Forest Officers, and this staff then also contributes to the monitoring related to illegal and unauthorized activities. Currently, there are 309 State Forest Officers FMU wide (See State Forest Officers 06112012.pdf). This document validates that the State Forest Officers and staff have been sworn in and are able to uphold state law on State Forest lands. The FME also has a significant number of gates, signage, clearly marked boundaries, and periodic staff presence on the forest to further secure its lands. Under 1.5.b. If illegal or unauthorized activities do occur, the proper actions are taken within the FME's jurisdiction under Pennsylvania state law. If any illegal or unauthorized activities occur outside of the FME's jurisdiction the case is handed over to the proper authorities. For 2012, citations were given for 224 infractions on the FMU's State Forests under their jurisdiction.	
1.6	NE		
Principle 2. TENURE AND USE RIGHTS AND RESPONSIBILITIES			
2.1	Yes	Under 2.1.a. The FME clearly has long-term rights to use and manage the FMU for the purposes described in its FMP. This has been legislatively mandated through various laws and acts. For example, The Department of Conservation and Natural Resources was created by the act of June 28, 1995 (P.L. 89, No. 18) (71 P.S. §§ 1340.101-1340.1103), known as the Conservation and Natural Resources Act. The Act, which is sometimes is referred to as Act 18, took effect on July 1, 1995. This gives the DCNR the legal authority authorizing the establishment and providing for the use and control of state forest land. Other uses of the land are established through varying legal agreements (e.g., campsite leases, gas and oil leases, surface use agreements, prospecting agreements). Under 2.1.b. The FME has procedures in place to identify and legally document established use and access rights associated with the FMU that are held by other parties. This process is described in its FMP. For timber sales Chapter V titled "Sale Design and Layout" is especially relevant. For example, when a timber sale is being planned the FME needs to determine if the sale is accessible. This includes public roads, weight restrictions, bonding requirements, seasonal hauling restrictions, the need for highway occupancy agreements, and any access needed to cross private land if necessary, and if so, whether landowners grant permission to cross the property.	

		<p>Under 2.1.c. Boundaries on State Forests observed during the audit were clearly marked as viewed in the forest and on maps. Use rights such as recreational activities granted by special permit or for general recreation (e.g., use hiking trails and water courses) are clearly identified on the ground (e.g., through signage) and on maps. Prior to commencing forest management activities such as harvesting in the vicinity of these boundaries, these areas are identified through mapping and a pre-harvest consultation between the forester and the contractors.</p>	
2.2	NE		
2.3	Yes	<p>Under 2.3.a. Interviews with FME employees and stakeholders established that if disputes arise regarding tenure claims or use rights the FME initially attempts to resolve them through open communication, negotiation, accessing education material or third party opinions, field reviews, and/or mediation. If these good-faith efforts fail, federal, state, and/or local laws are employed to resolve such disputes. Specific references to this include a conflict resolution section in timber sale contracts and gas and oil leases. A document titled "Recreational User Conflict Resolution Principles" which is noted in the FMP outlines ways to minimize conflicts in this area as well.</p> <p>Under 2.3.b. The FME documents any significant disputes over tenure and use rights and presented several instances of such disputes, or the potential for such disputes, to the auditors. See also findings for Criterion 1.1 and 4.4.</p>	
Principle 3. INDIGENOUS PEOPLES' RIGHTS			
3.1	NA	<p>Under 3.1.a. There are no tribal lands relevant to the State Forest land under management. Thus tribal forest management planning and implementation carried out by authorized tribal representatives is not applicable.</p> <p>Under 3.1.b. There are no tribal lands relevant to the State Forest land under management. Therefore, there is no requirement to obtain informed consent regarding forest management activities from the tribes prior to commencement of forest activities.</p>	
3.2	Yes	<p>Under 3.2.a. There are no state forest lands adjacent to tribal lands or falling within watersheds that affect tribal lands. However, the FME did send letters to various tribes with a history in the state who may have a potential interest in the FME's forest planning and management. The letter requested input into the FMP and invited groups to participate in the identification of resources of interest such as culturally important sites. In general, there was little in the way of a response; however, the Eastern Delaware Nation did agree to participate in FME's Ecosystem Management Advisory Committee, although they haven't participated to date.</p> <p>Under 3.2.b. The FME takes a number of actions to ensure forest management does not adversely affect tribal resources should they exist in an</p>	

		<p>area of operation. Measures for protecting tribal resources are incorporated in the FMP and other policies and documents. For example, in their mandated “Environmental Reviews” for the initiation of any project on State Forest lands that may or will disrupt, alter, or otherwise change the environment, the FME is required to review and consider all relevant issues. This review specifically includes “Archeological Sites and Historic Sites.”</p> <p>The FME also has two documents titled “Archaeological Sites, Architectural and Cultural Resources” and “Archaeological Sites” that were provided to the auditors. The FME was made aware of most of these listed sites through communication with, and data provided by, the Pennsylvania Heritage and Museum Commission (PHMC). These files are referred to when operations are going to take place on a specific State Forest. There is also the ability to map sites should that be deemed appropriate, so forest workers can be informed of sensitive areas.</p> <p>For gas and oil activity, the FME follows the policies and procedures in the document titled “Guidelines for Administering Oil and Gas Activity on State Forest Lands” to ensure historical and cultural sites are receiving adequate protections.</p>	
3.3	Yes	<p>The FME has invited tribal representatives to consult in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance. In July 2009, the FME contacted a representative of the Eastern Delaware Nations, to request their review of the FME’s land base for customary use rights and significant sites. As of this audit, the FME had not yet received a response from the Eastern Delaware Nations. A representative had also been invited to participate as a provisional member of the FME’s EMAC. However, to date there has been no participation. Despite this lack of communication precautions are still taken by the FME. See Indicator 3.2.b.</p>	
3.4	Yes	<p>The FME does not receive or use tribal knowledge.</p>	
Principle 4. COMMUNITY RELATIONS AND WORKERS' RIGHTS			
4.1	NE		
4.2	Yes	<p>Under 4.2.a.</p> <p>As a state agency the FME is mandated to meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families. There is a current statement titled “DCNR Safety and Health Policy Statement” which has been signed by the current Secretary of the DCNR.</p> <p>All employees are covered under the FME state health benefits and insurance options (See the document titled “Benefits Highlights & Contact Information).”The FME also has a safety program for its employees. For example, in an effort to promote safety awareness the FME implements the “Monthly Safety Tip Program.” District Foresters are asked each month to present and discuss a monthly tip, in addition to their already on-going daily safety awareness efforts. The FME also asks that staff document these meetings and the topics. They are also asked to maintain this documentation for auditing purposes. Documentation was provided to the auditors on safety training and records (See “DCNR Custom Injury Report” for the latter item).”</p>	

		<p>Under 4.2.b. The FME and its employees and contractors demonstrate a safe work environment. There is a written requirement in all contracts for health and safety standards to be met. Contracts, or other written agreements, include safety requirements. These were provided to the auditors (See the "DISTRICT TIMBER SALE CONTRACT"). Check boxes are included on the forester's "Timber Sale Inspection and Completion Report" form to ensure contractors use PPE and it is monitored weekly. There were no active forest operations visited during this audit; however, field visits found all FME staff equipped with appropriate safety equipment, which was also made available to the auditors.</p> <p>Under 4.2.c. The FME hires well-qualified service providers to safely implement the FMP. As noted on the "Timber Sale Inspection and Completion Report" form, wood buyers are required to provide proof that crew leaders have valid Pennsylvania SFI core level training or comparable training from another state. The "DISTRICT TIMBER SALE CONTRACT" also requires that qualified loggers follow all state and federal safety regulations.</p>	
4.3	NE		
4.4	Yes	<p>Under 4.4.a. The FME's social impact analysis is used to better understand the social impacts of their forest management activities and ensure they are addressed in the SFRMP and manifested in the implementation of their forest operations. This analysis is continually reviewed, especially during updates to its SFRMP, to determine if new social impacts are occurring that may need to be incorporated into forest management and planning. In addition to this effort, there are numerous FME advisory committees that have been set-up whereby citizens and special interest groups can provide inputs to further the FME's understanding of social impacts related to forest planning and management activities. The Citizens Natural Resource Advisory Committee (CNRAC), Recreation Advisory Committee (RAC), and Ecosystem Management Committee (EMAC), to name a few, all have representation from across the Commonwealth, and include people with varied backgrounds. Some committee meetings with external groups (e.g., CNRAC) are open to the public. There is also an FME wide Communications Committee. In their totality, these committees help the FME incorporate and respond to public inputs related to social impacts. As a result of the above processes, the FME is continuing to understand and address all issues related to the social impacts of its forest management activities and incorporating them into forest management planning and operations.</p> <p>There were other avenues for the FME to understand potential social impacts. For example, for historical and archaeological sites, if a previously unknown archaeological site location (e.g., a native American village site) is discovered on land administered by the FME, the discovery must be relayed to District management and the FME's Planning Section without delay for evaluation and possible listing with the Pennsylvania Bureau for Historical Preservation (BHP). Care is taken to minimize disturbance of any new discovery. While the FME documents all sites, they are not revealed in a public summary, since this information would jeopardize the resource.</p>	OBS 01/13

The FME also has a Planning and Feedback Process document which made known to the auditors which outlines environmental reviews for new projects to aid the FME in understanding, minimizing, and/or avoiding social impacts. On initiation of any project on State Forest lands that may or will disrupt, alter, or otherwise change the environment, a review and consideration of environmental review items is required. A formal written project review, addressing the environmental review items must be completed by the District Forester and approved by the State Forester. Projects include but are not limited to wetlands encroachment; in-stream alterations; disturbance activities in a natural area including insect and disease control; timber management in a wild area; ROW expansions or new construction (e.g., pipelines or major powerlines); surface mining; oil and gas leases (excluding gas storage); large-scale stone removals; subsurface disturbance to caves; addition of public-use roads to the state forest road system; land acquisitions/exchanges, new trail construction; and large blocks of artificial regeneration (i.e., monocultures >10 acres). Some projects, such as timber sales, have developed checklists to facilitate environmental reviews. Included in all checklists for project reviews are a number of specific items. This includes "Archaeological and Historic Sites," along with several other categories that would be of importance to tribal representatives. Again, while the FME documents this latter process, specific sites and activities surrounding them are not revealed in a public summary, since this information would jeopardize the resource.

Under 4.4.b.

The FME's SFRMP makes a clear statement that it encourages ongoing public inputs for consideration on state forest land timber management activities, harvesting levels, harvesting plans, and business processes as well as other activities. The auditors were provided with a summary document titled "State Forest Resource Management Plan 2007 Update Process, Summary of Public Comments" dated June 10, 2008 (previously completed in 2003). It can also be located on the FME's web site at http://www.dcnr.state.pa.us/forestry/sfrmp/Public_Comment_Summary_2007.pdf. This document describes how public inputs were collected, analyzed, and incorporated into forest management planning and operations for a number of other key areas of concern. Major topics of concern in the public summary were titled Recreation (e.g., motorized and non-motorized); Deer; Energy (e.g., oil and gas); Forest Health (e.g., invasives, pests); Silviculture and Forest Management; Specially Designated Areas; Land Acquisitions; Conservation Landscapes; Community Involvement; Education, and Outreach; and the Planning and Public Input Process.

For each of the above topics, public inputs are used to change planning and implementation, if it is deemed necessary by the FME staff. For example, if recreational activities are perceived to cause extensive damage to the forest (e.g., the Rattlesnake Enduro), the FME will address this issue with both the recreationists, the public, and on-the-ground steps for remediation. During the current audit, this process was viewed first hand by the auditors on the Sproul State Forest. For the Rattlesnake Enduro, the FME has a Special

	<p>Activities Agreement with the trail ride sponsor to repair all damage within 30 days. The route must be approved in advance by the FME. The FME charges a fee for the event that includes 8 hours of ranger patrol during the event and 16 hours for course inspection after the event to identify needs for remediation. For a given race, the FME obtains a security deposit of \$1,000 to be held until August 30th of that year or until any damages are repaired. Trails are rotated over a 3-year period and trails in various stages of rehabilitation and vegetative regeneration were viewed by the auditors. It was also noted that established roads are used for the races when possible, and that new trails are developed in less sensitive areas, while other sections of the trail in the forest are permanently closed.</p> <p>Those with an interest in the Marcellus Project and O&G drilling in general can use traditional means employed by the FME and previously discussed above to contact the FME and voice their opinions and provide inputs in forest management. The FME was shown to be responsive to considering these concerns.</p> <p>Under 4.4.c. The FME has procedures in its Silviculture Manual, Chapter 5 addressing adjacent landowner notification of their forest management activities. When a timber sale boundary is also a FME forest boundary, the FME will make a “good faith” effort to notify adjacent landowners of pending timber sales. The FME describes good faith efforts as: 1) face-to-face communication, 2) a letter describing the sale and providing contact information, and 3) for unknown landowners, signage along property boundaries defining the timber sale and providing contact information. The FME’s planning process typically begins six months in advance of an actual harvest operation and at least a 30 day notification will be provided. Sample notification documents (i.e., letters) for timber harvests were provided to the auditors. Additionally, timber sales and notifications of types of activities on state forests are available on the FME’s public Web site.</p> <p>Notifications of forest activities on state forest lands also are provided to municipal watersheds, state parks, camp lessees, trail clubs, and pipelines, and electrical line concerns. Other individuals and concerns are also notified of forest activity. As stated in the SFRMP’s Silvicultural/Timber Management section, if federal or state listed fauna or flora species, or habitat critical to their survival, either presently known or subsequently identified, occur within or adjacent to a proposed timber management project area, the FME’s wildlife biologists or botanists are notified prior to commencement of additional work. Wildlife biologists or botanists determine what, if any, changes to the project are necessary to protect any floral or faunal species or habitat. Also stated in the SFRMP, if archeological sites, either known or subsequently identified, occur within a proposed timber management project area, the FME’s Resource Planning and Information Section will be notified prior to commencement of any additional project work. The Section will coordinate assessment of the site and needed protection measures with the PHMC.</p> <p>Those affected by the Marcellus Project and O&G drilling are</p>	
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	<p>apprised of activities via traditional means employed by the FME and those previously discussed above. The FME also has modified its procedures in the Silviculture Manual, Chapter V. Section V. to address notification of O&G lessees and adjacent landowners of FME forest management activities. The FME must send a timber sale prospectus to the O&G lessee for all timber sales prepared on the O&G lease. In many cases the District Foresters and O&G operators work together to notify stakeholders on planned activities. For example, in the 2010 draft document titled “Administering Oil & Gas Activities on State Forest Lands” it states that “In the event that gas production from a newly completed well or a well that is being serviced, is required to be vented to the atmosphere and flared for safety reasons, the operator will first notify the District Forester of its plans at least 10 days before the anticipated flaring operation, and will second make provision to notify all stakeholders, as specified by the District Forester, of the planned event and provide for the consideration of special events that may be planned on state forest or state park lands during this time frame. The goal is to eliminate “surprises” to the local community and provide for an uneventful operation.” Procedures for notification of the Pennsylvania Fish and Boat Commission, PEMA, local fire departments, local county conservation offices, and possibly the Susquehanna River Basin Commission (SRBC) Inspector are outlined in the document in case there is a suspected pollution event, a road collision involving gas supply trucking, or any other event that may have the potential to release substances into local waterways, vernal pools, wetlands or onto the soil on state forest lands.</p> <p>The “Administering Oil & Gas Activities on State Forest Lands” document EXHIBIT C, STIPULATIONS FOR PROTECTION AND CONSERVATION OF STATE FOREST LANDS contains a section on Historical and Archaeological Sites, with notification procedures for District Foresters. If a planned O&G activity falls within an area with a known archaeological resource, the FME contacts the PHMC, who then provides instruction on what, if any, survey work is needed. As directed by PHMC, the FME has only been required to conduct Phase 1 survey work (i.e., site visit, background research, testing, analysis). Typically, resources may be potentially impacted when there is surface disturbance that extends below the plow level (e.g., O&G activity such as impoundments or drilling, road building). Protection measures are developed based on the survey results.</p> <p>The FME also will inform the public about these sales through various print media. The FME is required to advertise competitive lease sales in a minimum of three (3) newspapers of general circulation in the area(s) where the sale will occur, once a week, for three (3) consecutive weeks. A copy of a “Bidders Notice for Sealed Bids 2008” was provided to the auditors. Typically, leases are very large, sometimes involving, tens of thousands of acres, and notification is done more by public notices in the newspaper than by other means. The FME also typically issues a press release highlighting the sale specifics and who to contact with questions. Press releases are picked up by the Associated Press, Reuters, and other international media outlets and have generally made the evening (television) news. The FME also advertises lease sales in the weekly <i>Oil and Gas Journal</i> and <i>IHS Drilling Wire</i></p>	
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		<p>industry publications.</p> <p>The FME also has an even more targeted notification approach when addressing O&G issues as well. The FME developed a 2010draft document titled “Marcellus Shale Communications Strategy” whose main purpose is to maintain current efforts and initiate new ones to inform stakeholders of the Marcellus Project and receive inputs by those affected by O&G activities. These groups are primarily state forest visitors, recreationists, private landowners, and environmentally concerned citizens. The strategy has five goals directed toward: (1) explaining why there is O&G activity on state forests, (2) providing information on forest ecosystem impacts and FME mitigation activities, (3) providing information to users of the state forest on how O&G activity will impact them, (4) providing avenues for interested or affected parties to make complaints about O&G activity, and (5) proving private landowners information on protecting and restoring forest resources. To adequately address these notification efforts the FME will use a web site, brochures, a FAQ document, and FME staff. For example, the Marcellus Project web site is considered a primarily tool for providing information and soliciting inputs on O&G activities (See “Oil and Gas on State Forest Lands,” http://www.dcnr.state.pa.us/forestry/oil_gas.aspx). In addition, each District Forest has a person dedicated to working with oil and gas development, with an emphasis on being available to receive public comments and monitoring drilling areas.</p> <p>The “Oil and Gas on State Forest Lands” web site also informs the public concerning proposed O&G activity (See for example, “Oil and Gas Leasing Offering”, http://www.dcnr.state.pa.us/forestry/gas_lease.aspx). This site has offerings by date and provides maps on locations. The web site also contains a section summarizing public inputs title “Summary of Public Comments on Natural Gas Leasing” (See http://www.dcnr.state.pa.us/forestry/O&G/Oil_gas_comments_summary.pdf). Beginning in 2008, all materials associated with a PA DCNR competitive lease sales, including the State Forest Environmental Review documents, were posted on the PA DCNR-Bureau of Forestry web site (i.e., http://www.dcnr.state.pa.us/forestry/marcellus/pdfs/SFER_2008_LeaseSale.pdf).</p> <p>Through an examination of the SFRMP and associated documents related to the O&G issue (e.g., “Administering Oil & Gas Activities on State Forest Lands,” “Administering Oil & Gas Activities on State Forest Lands,” “Marcellus Shale Communications Strategy,” “Oil and Gas on State Forest Lands” web site), public comments in the SFRMP and on the web site at “Summary of Public Comments on Natural Gas Leasing,” field visits during the audit, and through stakeholder outreach it was determined that the FME is doing a credible job addressing notification procedures related to O&G activity.</p> <p>Under 4.4.d. The FME’s web site has been updated since the last audit (http://www.dcnr.state.pa.us/forestry/index.aspx) and this site provides a conduit for commenting on FME activities. The FME’s Bureau of Forest Directories can be found on the web site</p>	
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(<http://www.dcnr.state.pa.us/forestry/directory/index.htm>) and this also includes the Central Office Directory and the Forest District Directory. Thus all FME members can be contacted and comments communicated at a low cost. In addition, the FME's public consultation for FMP revisions includes advertised and clear methods for the public to comment on the FMP which is posted on the FME's web site(<http://www.dcnr.state.pa.us/forestry/sfrmp/>) as a draft and then as a final revision. Many public meetings were held throughout the state for the public to attend and provide comments. A summary of this consultation can be found on the web site (http://www.dcnr.state.pa.us/forestry/sfrmp/Public_Comment_Summary_2007.pdf), and it includes details on important public issues and inputs and how they are used for forest planning, management, and in operations.

The FME has also developed an e-mail database to more efficiently reach out to stakeholders who request information or updates. Individual entries are categorized by their expressed specific interest areas, so e-mail contacts will only go out to those listed for those categories. As a result, the interested public can return comments on current activities ongoing in the forest.

Consultations are also facilitated for short-term projects. For example, the FME has procedures in its Silviculture Manual, Chapter 5 addressing adjacent landowner notification of their forest management activities. When a timber sale boundary is also a FME forest boundary, the FME will make a "good faith" effort to notify adjacent landowners of pending timber sales. For further details see Indicator 4.4.c. above. These efforts have been shown to provide opportunities for consultation between the FME and the public.

Notifications of forest activities on state forest lands, which also promote consultations, also are provided to adjoining landowners, municipal watershed authorities, state parks, camp lessees, trail clubs, pipelines, and electrical line concerns. Other individuals and concerns are also notified of forest activity. As stated in the FMP's Silvicultural/Timber Management section, if federal or state listed fauna or flora species, or habitat critical to their survival, either presently known or subsequently identified, occur within or adjacent to a proposed timber management project area, the FME's wildlife biologists or botanists are notified prior to commencement of additional work. Wildlife biologists or botanists determine what, if any, changes to the project are necessary to protect any floral or faunal species or habitat. Also stated in the FMP, if archeological sites, either known or subsequently identified, occur within a proposed timber management project area, the FME's Resource Planning and Information Section will be notified prior to commencement of any additional project work. The Section will notify the PHMC and work to coordinate an assessment of the site and needed protection measures.

Through an examination of the FMP, the process and public comments in regard to the FMP, field visits during the audit, and through stakeholder outreach it was determined that the FME is doing a credible job addressing significant concerns related to forest management actions, evaluating site disturbing activities, and further

		<p>incorporating these concerns into its forest management planning and operations. These opportunities are low cost, and readily accessible to the public and special interest groups.</p> <p>Stakeholders acknowledged that not all social concerns can be addressed given budget constraints and competing interests on the land base (e.g., recreation and gas drilling). However, most stakeholders commented that the FME and its personnel show a genuine interest in trying to address clientele concerns (e.g., those of recreationists and adjacent landowners). It was also recognized that political influences are also a reality for any public agency. There is evidence in public documents and stakeholder comments that public input has affected policy decisions (e.g. trail building, approaches to gas development, pursuit of wind development, set asides of wild areas), as well as more localized site-specific decisions. However, during the current audit, through stakeholder auditor contacts and auditor analysis of stakeholder lists provided by the FME, it was determined that certain individuals and groups were not made aware of programs and activities where public inputs were being requested by the FME. For example, certain groups (e.g., hunting organizations or associations, some enterprises within the gas and oil industry, environmental groups) were not included within the advisory group construct and thus felt they were missing opportunities to provide public inputs to management, planning, and operations. See OBS 01/13</p>	
4.5	NE		
Principle 5. BENEFITS FROM THE FOREST			
5.1	NE		
5.2	NE		
5.3		<p>Under 5.3.a. The FME monitors utilization and works with contractors to encourage good utilization of all timber sold. Although there was no ongoing forest management operations in the Districts visited during the audit, recently completed timber sales provided evidence that the FME and its contractors are doing a good job to minimizing the loss and/or waste of harvested forest products.</p> <p>Under 5.3.b. The FME has numerous manuals and polices related to protecting forest resources, not to mention various laws and regulations that need to be followed. For example, the "PA DCNR BOF Silviculture Manual" Chapter 1 provides guidelines on protecting the forest from on-site operations, in particular in regard to rutting and erosion. Although there were no ongoing forest management practices in the Districts visited during the audit, recently completed jobs provided evidence that harvest practices were managed to protect residual trees and other forest resources. There was no evidence of soil compaction, rutting, or erosion. Timber Sales Contracts include a penalty clause related to damage of residual trees. Residual trees on timber sales were not significantly damaged to the extent that health, growth, or values would be noticeably affected. Also, damage to NTFPs was not in evidence as a result of past management activities. Fuel Wood/Mineral Permits are issued by the FME and provide guidelines on how to treat NTFPs. In addition, harvest sites had adequate woody debris. Through interviews with staff and documentation it was determined that techniques and</p>	

		equipment are being used to minimize impacts to vegetation, soil, and water in all cases discussed.	
5.4	NE		
5.5	NE		
5.6	Yes	<p>Under 5.6.a. The State Forest Resource Management Plan 2007 Update (SFRMP 2007) includes a Silviculture/Timber Section which provides a description with links to supporting documents of the sustained yield harvest level calculations (i.e., Harvest Allocation Model), and the goals and objectives of BOF's management and desired future forest conditions. The SFRMP 2007 contains harvest and growth rate projections for each district as well as for the BOF's forest as a whole; SFRMP 2007 indicates BOF is currently harvesting less than projected growth and will be for the next 40 years. Silviculture Section Chief indicated that the sustained yield harvest level calculations (Harvest Allocation Model) for each district take into account all the requirements specified under Indicator 5.6.a. Calculations are based on documented growth rates using updated Continuous Forest Inventory (CFI) data, including acreages of size classes and species distributions, and take into account silviculture practices commonly used by BOF. Harvest level calculations also incorporate mortality data from the CFI data. In addition, harvest calculations only include acreage from the Multiple Resource and Commercial land base and do not include reserve areas (e.g., Natural Areas, Wild Plant Sanctuaries).</p> <p>Under 5.6.b. Harvests have always been below sustained yield harvest calculations.</p> <p>Under 5.6.c. Observations by auditors indicted that the rates and methods of timber harvests will lead to achieving desired conditions and improve the health of the forest. District Foresters rely on the SILVAH Analysis (a computerized decision-support system) to estimate seeding potential and stocking levels of a harvest site, which also takes into account levels of deer browsing. This helps foresters determine whether a site should be fenced or not. Not every harvested site is fenced, and often a monitoring period takes place to determine if fencing is necessary. Overall, dollars spent and installed fencing has decreased in recent years.</p> <p>Under 5.6.d. For NTFPs, none are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the FME utilizes available information, and new information that can be reasonably gathered through its permit system, 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. For example, the FME monitors harvesting of NTFPs at the District level using a permit system for each type of NTFPs (e.g., rocks, firewood, sawdust, poles, specific species of plants). Samples of permits were provided to the auditors.</p>	
Principle 6. ENVIRONMENTAL IMPACT			
6.1	Partial	Indicator 6.1.a.2	NCR 01/13

	No	<p>The FME has a policy that Environmental Reviews, which include a PNDI search, will be conducted for all types of projects that will disrupt or alter the environment, such as impacts related to surface mining, and oil and gas leasing, or new trail construction. During the visit to District 10 (Sproul State Forest), auditors examined impacts related to the annual Brandywine Enduro motorcycle race. Although observations indicated that the impacts from the race may be relatively minor, the District Forester indicated that an Environmental Review or a PNDI search had not been conducted for new sections of the course that were located in undisturbed portions of the forest, where there was potential for a state-listed plant species to occur.</p> <p>See NCR 01/13.</p>	
6.2	Yes	<p>The FME does a good job protecting rare, threatened and endangered (RT&E) species across its land base. Prior to each timber sale, a timber sale prospectus is developed and reviewed by the FME's Ecological and Silviculture Sections, which includes information on the results of a Pennsylvania Natural Diversity Index (PNDI) search. The PNDI provides data on the known locations of all state and federally listed plants, animals, and natural communities that occur in Pennsylvania.</p> <p>The FME incorporates adequate protection measures for any known locations of RT&E species or natural communities as a result of the review process for each timber sale. The FME takes appropriate precautions when an RT&E species is known to occur on a site. The FME staff contacts the appropriate experts to determine management options. BOF buffers all vernal ponds and other unique habitats as part of their pre-harvest preparations. The FME has protected nearly 1,000,000 acres of forest land under the State Bioreserve System (SBS), which includes areas that contain HCVF attributes, such as Natural Areas, Wild Plant Sanctuaries, and Special Resource Management Areas.</p> <p>Most FME foresters are state-designated law enforcement officers to help control illegal hunting, fishing, trapping, and collecting of plants.</p>	
6.3	Yes	<p>As observed by the auditors, the FME 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 is under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics. The FME has protected or promotes old growth of different forest types, as it has designated on about 33% of its land base for the promotion and maintenance of old growth forests in the Natural Areas, Wild Areas, and areas in the Limited Management Zones.</p> <p>The FME works closely with PA Natural Heritage Program (NHP) and has identified and protected rare ecological communities in its Plant Sanctuaries and Natural Areas. Existing old growth forests have been identified and are protected in designated Natural Areas.</p> <p>The FME's management maintains habitat conditions for well-distributed species by protecting almost 33% of their forest lands in special management zones, as well as through their maintenance of stream management zones (SMZs) at harvest sites.</p>	

		<p>The FME has developed Aquatic Habitat Buffer Guidelines which detail buffer widths for various stream classes and aquatic habitats. These guidelines meet, and in some cases exceed, the FSC Streamside Management Zone (SMZ) requirements for the Appalachia Region. Observations during the audit indicated that the FME does a good job of protecting streams and avoiding stream crossing whenever possible.</p> <p>A primary objective of the FME is to achieve and maintain a balanced age-class distribution across its forest lands. The SFRMP 2007 provides quantitative data of its forest lands. The FME's forest management also seeks to maintain and enhance plant species diversity and composition. The FME often utilizes fences around harvested areas which protect and promote plant species diversity that otherwise would be impacted by deer browsing. Observations during the field visits verified that there is forest regeneration, forest structure, and species diversity, with the latter occurring in both the future overstory and in the understory for non-arboreal flora.</p> <p>The FME utilizes natural regeneration, but when planting is required, tree species are used that would naturally occur on the site, and seedlings are obtained from local sources. The only exception to this is on a few designated food plots where some non-invasive fruit trees have been planted to add species diversity and increase food for wildlife.</p> <p>Observations by the auditors indicated that the FME does a good job maintaining habitat components at its harvests sites, including leaving adequate live tree retention, and maintaining snags and down woody debris.</p> <p>While the FME has the option to develop a qualified plan to allow minor departure from the opening size limits during harvest as described in Indicator 6.3.g.1. According to the FME, there have not been any recent instances where this was necessary. Observations in the field did not uncover any opening size limit departures.</p> <p>Control of invasive species on State Forest lands follows IPM protocols. The FME looks at economic and environmental impacts, timing, and efficacy, with herbicide use as a last resort. Rarely are chemicals used in natural areas and plant sanctuaries. The FME has developed a Seeding Monitoring Protocol for areas that are seeded after a harvest to prevent, control, and monitor the spread of invasive species.</p>	
6.4	Yes	<p>The FME has documented the ecosystems that would naturally exist on State Forest lands, and assessed the adequacy of their representation and protection in the landscape. The FME is also involved in a variety of local and regional planning initiatives related to the landscape. These efforts include working with PA Wilds; working with county planners and municipalities who affect regional zoning and other policies; participation in watershed committees and projects (e.g., Aquatic Community Classification multi-agency project); participating in the development of utility (e.g., ROW design and contractual regulations), transportation, and economic development plans; working with state agencies, local governments,</p>	

		<p>funderson, and non-profit organizations to strategically work on seven state Conservation Landscape Initiatives; helping private landowners develop plans for managing forest resources on their property (Forest Stewardship Program) and planning and timber harvests; and cooperating and sharing knowledge with various special interest groups (e.g., TNC). In addition, the FME funds research projects through university departments that aid in appropriately facilitating local and regional planning initiatives. Interviews with FME employees, FME documentation, and several stakeholder interviews confirmed that these activities are taking place.</p> <p>The FME has conducted an adequate Representative Sample Areas (RSA) assessment. The SFRMP 2007 provides quantitative data on the amounts of land for each common forest type that occurs in Pennsylvania's State Forests. The FME has a robust GIS and works closely with the PA NHP as well as numerous other agencies for identifying and protecting unique natural communities.</p> <p>The FME has done an excellent job of establishing RSAs that serve all three purposes described under Criterion 6.4. The FME's Planning Section Chief indicated that the FME's RSA assessment is reviewed every five years concurrent with the FMP revision.</p>	
6.5	NE		
6.6	NE		
6.7	Yes	<p>Under 6.7.a. All FME field staff and contractors have received training in hazardous materials clean-up.</p> <p>Under 6.7.b. The FME has developed Spill Response and Clean-up Procedures which have been provided to all the Districts in the event of a hazardous material spill. In addition, all contractors are required to have spill kits at harvest sites, as specified in the Timber Sales Contracts.</p> <p>Under 6.7.c. The FME's Timber Sales Inspection Sheets also include a Sanitation section which has check boxes for litter removal, evidence of oil spills, and spill kits on site. Filled out sheets were shown to the auditors. Field observations indicated that all harvest sites were clean, with no evidence of trash or oil leaks. The FME field staff interviewed indicated that contractors do not park their equipment near streams or other aquatic habitats.</p>	
6.8	NE		
6.9	Yes	<p>Under 6.9.a. BOF generally does not use exotic species in its management and has a policy that no invasive species will be used on State Forest lands. BOF relies on the PA Department of Conservation and Natural Resources (DCNR) Invasive Species List to determine what species are invasive and should not be used for management. BOF has developed a Seeding Monitoring Guideline for monitoring the impacts and spread of various seed mixes (both native and non-native) when used for management.</p> <p>Under 6.9.b. The FME does not use invasive, exotic species in their</p>	

		management. Locations of all seed mixes used are documented and their impacts are monitored under the Seeding Monitoring Guidelines. Under 6.9.c. The FME does not use invasive, exotic species in their management. Locations of all seed mixes used are documented and their impacts are monitored under the Seeding Monitoring Guidelines. If adverse impacts of a seeding mix are detected during monitoring, BOF will take appropriate action to mitigate the effects.	
6.10	NE		
Principle 7. MANAGEMENT PLAN			
7.1	NE		
7.2	Yes	Under 7.2.a. The FME's FMP is revised every five years. The revision process is comprehensive and thorough. It incorporates internal reviews to identify areas that need updating, including comments from advisory committees and public input, both prior to and after the draft FMP is developed.	
7.3	Yes	Under 7.3.a. Interviews with the FME's staff indicated that they are highly qualified and trained to carry out the objectives of the FMP. For example, the FME requires at least one person on a crew to have a chemical applicators license when chemicals are applied on the forest. In addition, the FME requires at least one crew member be a trained fire-fighter when prescribed fire is used on State Forest lands. The FME also requires all contractors to be qualified and trained to implement their respective components of the FMP. For example, all timber crews are required to have at least one person SFI certified. In addition, the FME's foresters conduct pre-harvest meetings with the contractors to ensure that all BMPs are followed and that all unique features of a site are recognized and protected. Staff also partake in various training workshops and short courses. For example documentation was given to the auditors on "SILVAH:OAK, Training in Ecology and Silviculture of Mixed Oak Forests" which was provided by the USDA Forest Service to the BOF. SILVAH is used as a guideline when managing the State Forests. Documentation on other training events and participation by the FME's staff were provided to the auditors.	
7.4	Yes	Under 7.4.a. BOF's FMP and numerous other supporting documents are posted on its web site and available to the public at no cost. Under 7.4.b. The FME strives to ensure that the public has input, prior to, and after the draft FMP is developed. The FME holds public meetings across the state to receive input on the draft. Advisory committees can also review the draft and have inputs to the process. The public is also able to post comments on the FME's web site. The FME reviews all public comments and summarizes the comments on its web site.	
Principle 8. MONITORING AND ASSESSMENT			
8.1	NE		
8.2	Yes	Under 8.2.a.1. The FME has a comprehensive monitoring strategy that includes numerous protocols which address all the Indicators and	OBS 02/13

requirements under Criterion 8.2. For example, all commercially harvested timber products are tracked, and a comprehensive inventory system is maintained and updated on a regular basis. Nearly all monitored elements of forest management accounted for under Criterion 8.2 are included in monitoring for gas and oil development. It is not necessary to monitor for some elements due to those elements being avoided during the siting process, (e.g., RT&E species and communities).

Under 8.2.a.2.

The loss of forest resources is monitored in a variety of ways including through the Continuous Forest Inventory (CFI) plots, Landscape Exams, and aerial monitoring of insect and disease outbreaks by the Forest Pest Management Division. Records of poaching and theft of timber are maintained at District offices.

Under 8.2.b.

The FME tracks and maintains records of timber harvests and NTFPs. For the latter there is a permitting system for each respective NTFP (e.g., rock, firewood, poles, posts).

Under 8.2.c.

The FME works closely with PA NHP and other state and federal agencies for monitoring RT&E species and natural communities. The FME also conducts PNDI searches prior to all timber sales and other site disturbing activities. HCVF areas are also monitored. Roads are monitored by field staff and maintenance crews within each district. In addition, one BOF staff member for each district is dedicated to monitoring impacts related to gas development (e.g., pipelines, roads, drill sites, etc.).

Under 8.2.d.1.

All active timber harvests and other site disturbing activities are monitored by weekly inspections to ensure that site specific plans and operations are properly implemented. Close-out of harvest sites is also monitored via a close-out inspection. Silviculture Section Chief indicated that regeneration surveys after harvests have been discontinued. However, it was unclear whether all stands are routinely visited after the harvests to ensure adequate regeneration is occurring. **See OBS 02/13.**

Under 8.2.d.2.

Observations indicated that all roads traveled during the audit were in excellent condition. Inspections of timber harvest and other site disturbing activities are monitored by weekly inspections and include road assessments.

Under 8.2.d.3.

The FME informally and formally monitors relevant socio-economic issues. They do not track the creation and/or maintenance of local jobs in a formal way. The FME does track timber sale volumes, which provides an indication of related jobs. The FME contributes to the development of jobs through its support of local economic development, but it is not possible for the number of jobs to be quantified due to varying and external factors. The FME monitoring of public responses to management activities is facilitated by public

		<p>reporting of timber sales and including information on how to contact the FME with feedback/input. Surveys of public satisfaction with management operations are periodically conducted, as are town hall meetings for public input on forest management decisions. Results of these surveys and meetings are formally recorded and kept on file at the District offices.</p> <p>Under 8.2.d.4. The FME monitors stakeholder responses. It has a Communications Section which documents and addresses all stakeholder responses that are received through the Districts, web site, or phone. The FME closely monitors all costs and revenues of its forest management activities. Various sections of BOF are responsible for tracking costs and revenues. The state Controller's Office oversees all financial transactions.</p> <p>Under 8.2.d.5. Currently, there are no sites of cultural significance which provide an opportunity to jointly monitor such sites with tribal representatives. Contacts have been made with tribal representatives but thus far there has been no response.</p> <p>Under 8.2.e. As a state agency, the FME maintains detailed records on the costs of forest management activities. Much of this information is available to the public. The state Controller's Office oversees all FME financial transactions.</p>	
8.3	Yes	<p>Under 8.3.a. When forest products are being sold as FSC-certified, the FME has written procedures that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale. From time to time, the Bureau of Forestry offers sales of timber on behalf of other state agencies. Currently, no other state agency is FSC-certified. Sales for other agencies are kept separate and are always kept separate from the sale of State Forest timber.</p> <p>Under 8.3.b. When using Bureau of Forestry contracts, procedures call for clearly labeling them as "FSC-Certified" or "non FSC-certified" in the upper right-hand corner of the first page of the contract. For the former, FSC Pure appears on the contract, and for the latter, no certification number will appear on these contracts. Documentation was provided to the auditors.</p>	
8.4	Yes	<p>Under 8.4.a. The FME is engaged in a number of monitoring activities. Similar to procedures for forest management activities, the FME is able to identify and monitor known sites related to O&G activity through communication with, and data provided by, the PHMC. Database information provided by the PHMC is not shared with external parties. In the broadest context, the FME has been made aware that most archaeological and historical sites in the state are located in valley bottoms and in close proximity to rivers-areas where the FME generally does not extends leases for O&G activity. On a site-specific level, the FME has access to a database of historic sites. Data is in tabular format and references are made to compartments that have known archaeological sites. If a planned activity falls within</p>	

		<p>a compartment with an archaeological or historical site, maps are then consulted that show the general site location. This search is conducted for every planned forest activity. No sites of this nature were observed during the audit. For RT&E species, the Pennsylvania Natural Diversity Index (PNDI) is searched by the FME prior to any earth disturbance to determine the possible presence of RT&E flora and fauna species of concern. If RT&E species are in close proximity to a planned O&G site, the site is relocated and/or adequate buffers are put in place to protect species of concern.</p> <p>Under 8.4.b. The FME's FMP is revised every five years and the results of monitoring, which include stakeholder input as well as monitoring of natural resources, are incorporated into the revisions of the FMP. If monitoring efforts and results indicate that management objectives, including those necessary for conformance with the FSC-US Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the FMP, operational plans, and/or other plan implementation measures are revised accordingly. This was evidenced by the SFRMP 2007, which includes a discussion and data on how results of monitoring were incorporated into the FMP.</p>	
8.5	NE		
Principle 9. MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS			
9.1	NE		
9.2	NE		
9.3	NE		
9.4	Yes	<p>Under 9.4.a. The FME currently monitors all designated HCVFs. Monitoring procedures have been previously summarized in the document "PA BOF HCVF Monitoring Matrix.doc" (10-1-09). This process enabled the FME to clearly describe its annual monitoring procedures. Many HCVFs are informally monitored by field staff during daily field operations. All management projects conducted in the forests (e.g., timber harvest, gas or oil projects, new trail construction) are checked against the GIS database to ensure that there are no impacts with HCVFs. In addition, many HCVFs are monitored through the CFI at five-year intervals (e.g., Wild and Natural Areas). Other HCVFs are monitored according to a schedule (e.g., Plant Sanctuaries and Ecological Focus Areas; 20 sites monitored/year). The FME has recently developed the document, "2011 High Conservation Value Forest Analysis and Identification" which provides a new framework for monitoring and managing HCVFs. Currently, the FME is developing individual management plans for each HCVF, which will include a monitoring strategy. At the time of the audit, all management plans had not been completed.</p> <p>Under 9.4.b. It was the auditors' opinion that all HCVFs are adequately being monitored and that modifications in management are implemented when HCVF attributes are at risk. For example, in the Hemlocks Natural Area (designated because of its old growth hemlock) the FME determined that the hemlock wooly adelgid was threatening the integrity of the site. The FME modified its policy of no management in Natural Areas, so that some of the trees could be treated with an insecticide.</p>	

Principle 10. PLANTATIONS			
10.1	NA		
10.2	NA		
10.3	NA		
10.4	NA		
10.5	NA		
10.6	NA		
10.7	NA		
10.8	NA		
10.9	NA		

APPENDIX V: Chain-of-Custody Conformance (confidential)

Note: This CoC Appendix is used for FMEs only selling standing timber, stumpage, logs, chips and/or non-timber forest products (NTFPs) produced within a FMU covered by the scope of the certificate. FME certificate scopes that include primary or secondary processing facilities shall include an evaluation against the full FSC CoC standard: FSC-STD-40-004. Refer to that separate report Appendix.

Definition of Forest Gate:(check all that apply)

<input checked="" type="checkbox"/>	Standing Tree/Stump: FME sells standing timber via stumpage sales.
<input checked="" type="checkbox"/>	The Log Landing: FME sells wood from the landing/yarding area.
<input type="checkbox"/>	On-site Concentration Yard: Transfer of ownership occurs at a concentration yard under the control of the FME.
<input type="checkbox"/>	Off-site Mill/Log Yard: Transfer of ownership occurs when offloaded at purchaser's facility.
<input type="checkbox"/>	Other: <i>explanation</i>
Comments: None	

Scope Definition of CoC Certificate:

Does the FME further process material before transfer at forest gate? <i>(If yes then processing must be evaluated to full CoC checklist for CoC standard FSC-STD-40-004 v2.)</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Note: This does not apply to on-site production of chips/biomass from wood harvested from the evaluated forest area or onsite processing of NTFPs.	
Comments: FME does not process material before transfer at the forest gate.	
Is the FME a large scale operation (>10,000 hectares) or a Group Certificate? <i>(If yes then CoC procedures for all relevant CoC criteria shall be documented.)</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: FME is a large-scales operation exceeding 10,000 hectares.	
Does non-FSC certified material enter the scope of this certificate prior to the forest gate, resulting in a risk of contamination with wood/NTFPs from the evaluated forest area (e.g. FME owns/manages both FSC certified and non-FSC certified FMUs)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: CoC procedures specify that certified and non-certified wood must be separated. From time to time, the Bureau of Forestry offers sales of timber on behalf of other state agencies. Currently, no other state agency is FSC-certified currently. Sales for other agencies are kept separate and are always kept separate from the sale of State Forest timber. If using Bureau of Forestry contracts, procedures call for clearly labeling them as "non FSC-certified" in the upper right-hand corner of the first page of the contract and no certification number shall appear on these contracts.	
Does FME outsource handling or processing of FSC certified material to subcontractors (i.e. milling or concentration yards) prior to transfer of ownership at the forest gate? <i>(If yes a finding is required for criterion CoC 4.1 below.)</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments: There is no outsourcing of FSC-certified materials to subcontractors prior to transfer at the forest gate.	
Does FME purchase certified wood/NTFPs from other FSC certificate holders and plan to sell that material as FSC certified? <i>(If yes then a separate CoC certificate is required that includes a full evaluation of the operation against FSC-STD-40-004 v2.)</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments: FME does not purchase certified wood/NTFPs from other FSC certificate holders.	
Does FME use FSC and/or Rainforest Alliance trademarks for promotion or product labeling? <i>(If FME does not nor has no plans to use FSC/RA trademarks delete trademark criteria checklist below.)</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: FSC and/or Rainforest Alliance trademarks are used for promotional purposes only. There is no on-product labeling.	

Annual Sales Information

Total Sales/ Turnover	25,523,096 US\$
Volume of certified product sold as FSC certified (i.e. FSC claim on sales documentation) (previous calendar year)	220,830 m3 of sawtimber; 101,335 m3 of round pulpwood
Total volume of forest products harvested from certified forest area during reporting period defined in Appendix I above.	See note below*

*Note: There was \$20,940,000 in sales of FSC-certified wood. Differences in values from the total value above to the value of FSC certified sales, is based largely on lands cleared for gas pads, which the FME does not sell as FSC certified, and the addition of firewood permits, timber sold for right-of-way clearings (assessed as damages), and miscellaneous invoices. The FME does not have a total volume for these sales, since gas clearings are mostly charged at \$5,000 per acre, firewood is sold as cords, and miscellaneous invoices are calculated as board footage.

Chain-of-Custody Criteria [FM-35 Rainforest Alliance Chain-of-Custody Standard for Forest Management Enterprises (FMEs)]

1. Quality Management	
COC 1.1: FME shall define the personnel/position(s) responsible for implementing the CoC control system.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: The primary person responsible for the CoC system is the Silviculture Section Chief who has been identified in the written CoC procedures provided to the auditors.	
COC 1.2: All relevant staff shall demonstrate awareness of the FME's procedures and competence in implementing the FME's CoC control system.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Administration and staff interviewed indicated awareness of the CoC system and their responsibilities. Because all contracts with CoC information are issued from the central office and CoC ends at the stump or landing, field foresters are not routinely involved in CoC responsibilities.	
COC 1.3: FME procedures/work instructions shall provide effective control of FSC certified forest products (including NTFPs) from standing timber until ownership is transferred at the forest gate. <i>Note: For large scale operations (>10,000ha) and Group Entities, CoC procedures covering all relevant CoC criteria shall be documented.</i> Including: a) Procedures for physical segregation and identification of FSC certified from non-FSC certified material. (If applicable) b) Procedures to ensure that non-FSC certified material is not represented as FSC certified on sales and shipping documentation. (If applicable) c) Procedures to include the FME's FSC certificate registration code and FSC claim (FSC 100%) on all sales and shipping documentation for sales of FSC certified products. d) Recordkeeping procedures to ensure that all applicable records related to the production and sales of FSC certified products (e.g. harvest summaries, sales summaries, invoices, bills of lading) are maintained for a minimum of 5 years. e) Procedures to ensure compliance with all applicable FSC/Rainforest Alliance trademark use requirements.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Note 1: In the case of group certificates, the Group Manager must ensure Group Members implement CoC control system as defined in documents procedures/work instruction.	
Note 2: In cases where it is not possible or practical to include the FME's certificate registration code on shipping documents, the FMEs procedures shall provide for a clear, auditable link between the material included in the shipment, a FMU included in the scope of the certificate and the applicable sales documentation (i.e. harvest or procurement contract) that includes the required information detailed in c) above.	
Findings: All procedures listed above from a) through e) are applicable and located in the document "Chain-of-Custody Procedures" dated 9-16-2009.	

2. Certified Material Handling and Segregation

COC 2.1: FME shall have a CoC control system in place to prevent the mixing of non-FSC	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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certified materials with FSC certified forest products from the evaluated forest area, including: a) Physical segregation and identification of FSC certified from non-FSC certified material. b) A system to ensure that non-FSC certified material is not represented as FSC certified on sales and shipping documentation. Note: If no outside wood/NTFP is handled by FME within scope of certificate, mark as N/A.	N/A <input type="checkbox"/>
Findings: a) There is little to no risk of mixing at the forest landing; however, CoC procedures specify that FSC-certified and non-certified wood must be separated. b) From time to time, the Bureau of Forestry offers sales of timber on behalf of other state agencies. Currently, no other state agency is FSC-certified currently. Sales for other agencies are kept separate and are always kept separate from the sale of State Forest timber. If using Bureau of Forestry contracts, procedures call for clearly labeling them as “non FSC-certified” in the upper right-hand corner of the first page of the contract and no certification number shall appear on these contracts.	
COC 2.2: FME shall identify the sales system(s) or “Forest Gate”, for each FSC certified product covered by the Chain of Custody control system: i.e. standing stock; sale from log yard in the forest; sale at the buyer’s gate; sale from a log concentration yard, etc.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: The FME’s “Chain-of-Custody Procedures” identifies the “Forest Gates “used for each FSC-certified product covered in its CoC control system.	
COC 2.3: FME shall have a system that ensures that FME products are reliably identified as FSC certified (e.g. through documentation or marking system) at the forest gate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Sales contracts are used to identify FSC-certified wood. Timber sale contracts include the FSC certificate code; and the designation “FSC Pure” has been added to new contracts issued after September 2009. A sample of sales contract titled “TREE ESTIMATE TIMBER STUMPAGE SALE CONTRACT” was provided to the auditors.	
COC 2.4: FME shall ensure that certified material is not mixed with non-FSC certified material at any stage, up to and including the sale of the material. Note: If no outside wood is handled by FME within scope of certificate, mark as N/A.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Findings: From time to time, the FME offers sales of timber on behalf of other state agencies. Currently, no other state agency is FSC-certified. Sales for other agencies are kept separate and are always kept separate from the sale of State Forest timber. If using Bureau of Forestry contracts, procedures call for clearly labeling them as “non FSC-certified” in the upper right-hand corner of the first page of the contract and no certification number shall appear on these contracts.	

3. Certified Sales and Recordkeeping	
COC 3.1: For material sold with FSC claim the FME shall include the following information on sales and shipping documentation: a) FME FSC certificate registration code, and b) FSC certified claim: FSC 100% Note: In cases where it is not possible or practical to include the FME’s certificate registration code on shipping documents, the FMEs shall ensure there is a clear, auditable link between the material included in the shipment, a FMU included in the scope of the certificate and the applicable sales documentation (i.e. harvest or procurement contract) that includes the required information detailed above.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Following its CoC procedures the FME’s sales contracts are used to identify FSC-certified wood. Timber sale contracts include the FSC certificate code; and the designation “FSC Pure” has been added to new contracts issued after September 2009. A sample of sales contract titled “TREE ESTIMATE TIMBER STUMPAGE SALE CONTRACT” was provided to the auditors.	
COC 3.2: FME shall maintain certification production and sales related documents (e.g. harvest summaries, invoices, bills of lading) for a minimum of 5 years. Documents shall be kept in a central location and/or are easily available for inspection during audits.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: FME “Chain-of-Custody Procedures” require that records be kept for 7 years.	
COC 3.3: FME shall compile an annual report on FSC certified sales containing monthly	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

sales in terms of volume of each FSC certified product sold to each customer. This report shall be made available to Rainforest Alliance staff and auditors during regular audits and upon request.	
Findings: Records of sales are maintained in digital form on FME computers. Sales records can be summarized and printed for any period or product desired. A summary of sales and volumes for the last full calendar year of operation was provided to the audit team and included in the document titled "Pennsylvania Bureau of Forestry Forest Products Statistical Report 2011."	

4. Outsourcing	
COC 4.1: FME shall obtain approval from Rainforest Alliance prior to initiating outsourcing of handling (e.g. storage concentration yards) or processing of FSC certified material to subcontractors.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
CoC 4.2: FME control system shall ensure that CoC procedures are followed at subcontracted facilities for outsourcing and FME shall collect signed outsourcing agreements covering all applicable FSC outsourcing requirements per FSC--40-004 <i>FSC Standard for Chain of Custody Certification</i> . Note 1: If FME outsources processing or handling of FSC certified material the outsourcing report appendix is required. Note 2: Check N/A If FME does not outsource processing or handling of FSC material.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Findings: There is no outsourcing on the part of the FME.	

5. FSC/Rainforest Alliance Trademark (TMK) Use Criteria	
<input type="checkbox"/> Check if section not applicable (FME does not, and does not plan to use FSC trademarks)	
Standard Requirement: The following section summarizes the FME's compliance with FSC and Rainforest Alliance trademark requirements. Trademarks include the Forest Stewardship Council and Rainforest Alliance names, acronyms (FSC), logos, labels, and seals. This checklist is directly based on the FSC standard.FSC-STD-50-001 <i>FSC Requirements for use of the FSC trademarks by Certificate Holders</i> . References to the specific FSC document and requirement numbers are included in parenthesis at the end of each requirement.(Rainforest Alliance Certified Seal = RAC seal).	
General	
COC 5.1: FME shall have procedures in place that ensure all on-product and promotional FSC/Rainforest Alliance trademark use follows the applicable policies:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: The document titled "Chain-of-Custody Procedures" has guidelines in place to ensure that promotional FSC/Rainforest Alliance trademark use follows all applicable policies. There is no on-product labeling.	
COC 5.2: FME shall have procedures in place and demonstrate submission of all FSC/Rainforest Alliance claims to Rainforest Alliance for review and approval prior to use, including" a) On-product use of the FSC label/RAC seal; b) Promotional (off-product) claims that include the FSC trademarks ("Forest Stewardship Council", "FSC", checkmark tree logo) and/or the Rainforest Alliance trademarks (names and seal) (50-001, 1.1.6).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: a) FME does not use on-product labeling. b) All applicable procedures for promotional use of FSC/Rainforest Alliance trademarks are included in the document titled "Chain-of-Custody Procedures"A sample of a recent trademark use approved by the Rainforest Alliance on 7/28/2011 (Case: 00049690) was provided to the auditors. This approval permitted the use of the FSC logo on the Rothrock State Forest brochure.	
COC 5.3:FME shall have procedures in place and demonstrates that all trademark review and approval correspondence with Rainforest Alliance is kept on file for a minimum of 5 years:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: FME CoC procedures specify that approval correspondence is kept on file for a minimum of 5	

years.

Off-product / Promotional

Check if section not applicable (FME does not, and does not plan to use the FSC trademarks off-product or in promotional pieces)

Note: promotional use items include advertisements, brochures, web pages, catalogues, press releases, tradeshow booths, stationary templates, corporate promotional items (e.g., t-shirts, cups, hats, gifts).

When applicable to the FME's promotional/off-product use of the trademarks, the criteria below shall be met:

Yes No

Findings: The Rainforest Alliance has reviewed all uses of trademarks for consistency with the following indicators. Samples to validate this were provided to the auditors.

COC 5.4: If the FSC trademarks are used for promotion of FMUs, FME shall limit promotion to FMUs covered by the scope of the certificate.

COC 5.5: In cases that the Rainforest Alliance trademarks are used (50-001, 6.2):

- a) The FSC trademarks shall not be at a disadvantage (e.g., smaller size);
- b) The FSC checkmark tree logo shall be included when the RAC seal is in place.

COC 5.6: If the FSC "promotional panel" is used, the following elements shall be included: FSC checkmark logo, FSC trademark license code, FSC promotional statement, FSC web site address (50-001, 5.1).

Note: the promotional panel is a prescribed layout with a border available to certificate holders on the FSC label generator site.

COC 5.7: In cases that the FSC trademarks are used with the trademarks (logos, names, and identifying marks) of other forestry verification schemes (SFI, PEFC, etc.), Rainforest Alliance approval shall be in place (50-001, 7.2).

COC 5.8: Use of the FSC trademarks in promotion of the FME's FSC certification shall not imply certain aspects are included which are outside the scope of the certificate (50-001, 1.9).

COC 5.9: Use of the FSC trademarks on stationery templates (including letterhead, business cards, envelopes, invoices, paper pads) shall be approved by Rainforest Alliance to ensure correct usage (50-001, 7.3, 7.4 & 7.5).

COC 5.10: In cases that the FSC trademarks are used as part of a product name, domain name, and/or FME name, R approval shall be in place (50-001, 1.13).

On-product

Check if section not applicable (FME does not, and does not plan to apply FSC labels on product)

APPENDIX VI: Rainforest Alliance Database Update Form

Instructions: For each FSC certificate, Rainforest Alliance is required to upload important summary information about each certificate to the FSC database (FSC-Info). During each annual audit RA auditors should work with the certificate holder to verify that the information posted on FSC-Info is up to date as follows:

1. Print out current Fact Sheet prior to audit from FSC-Info web site or direct link to fact sheets (<http://www.fsc-info.org>)
2. Review information with the FME to verify all fields are accurate.
3. If changes are required (corrections, additions or deletions), **note only the changes** to the database information in the section below.
4. The changes identified to this form will be used by the RA office to update the FSC database.

Is the FSC database accurate and up-to-date? YES NO
(if yes, leave section below blank)

Client Information (contact info for FSC web site listings)

Organization name			
Primary Contact		Title	
Primary Address		Telephone	
Address		Fax	
Email		Webpage	

Forests

Change to Group Certificate	<input type="checkbox"/> Yes <input type="checkbox"/> No	Change in # of parcels in group	total members
Total certified area		865,476 Hectares	2,137,727 Acres

Species (note if item to be added or deleted)

Scientific name	Common name	Add/Delete

Products

FSC Product categories added to the FM/CoC scope (FSC-STD-40-004a)		
Level 1	Level 2	Species