

**Forest Management and Stump-to-Forest Gate Chain-of-Custody
Certification Evaluation Report for the:**

True North Certified Forestland Network

**Conducted under auspices of the SCS Forest Conservation Program
SCS is an FSC Accredited Certification Body**

**CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00119G**

Submitted to:

True North Certified Forestland Network

**A Program of the
Minnesota Wood Education Project
St. Paul, Minnesota**

Lead Author: Kyle Meister

Date of Field Audit: June 2, 2009

Date of Report: September 11, 2009

Certified: October 8, 2009

By:

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Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the SCS website (www.scs-certified.com) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of the True North Certified Forestland Network.

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by the True North Certified Forestland Network (TNCFN) to conduct a certification evaluation of its group forest management certification program. Under the FSC/SCS certification system, forest management operations meeting international standards of forest stewardship can be certified as “well managed”, thereby enabling use of the FSC endorsement and logo in the marketplace.

In June 2009, a natural resource specialist was empanelled by SCS to conduct the evaluation. The auditor collected and analyzed written materials, conducted interviews and completed a 1 day field and office audit of the subject property as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team determined conformance to the 56 FSC Criteria in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to TNCFN for the management of its group certification program. SCS issued no preconditions prior to finalization of this report. In the event that a certificate is awarded, Scientific Certification Systems will post this public summary of the report on its web site (www.scs-certified.com).

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SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION

1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	True North Certified Forestland Network
Contact person	W. Gary Winget – General Manager
Address	26 E. Exchange Street, Suite 405, St. Paul, MN 55101
Telephone	651-223-5629
Fax	651-222-5263
E-mail	Info@TrueNorthCertified.com.
Certificate Number	
Certificate/Expiration Date	
Certificate Type	Group
SLIMF	Group SLIMF certificate
Group Members <i>if applicable</i>	1
Number of FMU's <i>if applicable</i>	1
Number of FMUs in scope that are	
less than 100 ha in area	1
100 - 1000 ha in area	-
1000 - 10 000 ha in area	-
more than 10 000 ha in area	-
Location of certified forest area	
Latitude	46° 20' 11.544"
Longitude	-93° 55' 44.5051"
Forest zone	Temperate
Total forest area in scope of certificate which is included in FMUs that:	
are less than 100 ha in area	181 ac
are between 100 ha and 1000 ha in area	-
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	-
Total forest area in scope of certificate which is:	
privately managed ¹	181 ac
state managed	-
community managed ²	-
Number of forest workers (including contractors) working in forest within scope of certificate	3
Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	37 ac
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0 ac
Area of forest classified as 'high conservation value	0 ac

¹ The category of 'private management' includes state owned forests that are leased to private companies for management, e.g. through a concession system.

² A community managed forest management unit is one in which the management and use of the forest and tree resources is controlled by local communities.

forest'	
List of high conservation values present ³	N/A
Chemical pesticides used	None.
Total area of production forest (i.e. forest from which timber may be harvested)	144 ac
Area of production forest classified as 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF)	0 ac
Area of production forest regenerated primarily by replanting ⁴	Not reported.
Area of production forest regenerated primarily by natural regeneration	Not reported.
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	<i>Betula papyrifera</i> (Paper birch), <i>Populus grandidentata</i> (Big-tooth aspen), <i>Populus tremuloides</i> (Trembling aspen), <i>Quercus rubra</i> (Northern red oak), <i>Acer saccharum</i> (Sugar maple), <i>Pinus resinosa</i> (Red pine)
Approximate annual allowable cut (AAC) of commercial timber	Not reported.
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products (include basic description of product - e.g. round wood, pulp wood, sawn timber, kiln-dried sawn timber, chips, resin, non-timber forest products, etc.)	Pulp wood, sawn timber, pallet lumber, veneer logs, firewood, and burls

Conversion Table English Units to Metric Units

Length Conversion Factors

To convert from	to	multiply by
mile (US Statute)	kilometer (km)	1.609347
foot (ft)	meter (m)	0.3048
yard (yd)	meter (m)	0.9144

Area Conversion Factors

To convert from	to	multiply by
square foot (sq ft)	square meter (sq m)	0.09290304
acre (ac)	hectare (ha)	0.4047

Volume Conversion Factors

Volume

To convert from	to	multiply by
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
gallon (gal)	liter	4.546

1 acre = 0.404686 hectares

1,000 acres = 404.686 hectares

³ High conservation values should be classified following the numbering system given in the ProForest High Conservation Value Forest Toolkit (2003) available at www.ProForest.net

⁴ The area is the *total* area being regenerated primarily by planting, *not* the area which is replanted annually. NB this area may be different to the area defined as a 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF) or for other purposes.

1 board foot = 0.00348 cubic meters
1,000 board feet = 3.48 cubic meters
1 cubic foot = 0.028317 cubic meters
1,000 cubic feet = 28.317 cubic meters

Breast height = 1.4 meters, or 4 1/2 feet, above ground level

Although 1,000 board feet is theoretically equivalent to 2.36 cubic meters, this is true only when a board foot is actually a piece of wood with a volume 1/12 of cubic foot. The conversion given here, 3.48 cubic meters, is based on the cubic volume of a log 16 feet long and 15 inches in diameter inside bark at the small end.

1.2 Management Context

As a group certificate holder in Minnesota, TNCFN's management of forestlands is subject to a host of local, state and federal guidelines and regulations. The regulations of greatest relevance to forest managers in Minnesota are associated with the following statutes:

Pertinent Regulations at the Federal Level:

Endangered Species Act
Clean Water Act (Section 404 wetland protection)
Occupational Safety and Health Act
National Historic Preservation Act
Archaeological and Historic Preservation Act
Americans with Disabilities Act
U.S. ratified treaties, including CITES
Federal Aid in Wildlife Restoration Act of 1937 (Pittman-Robertson Act)
Federal Aid in Fish Restoration Act
National Environmental Policy Act

Pertinent Regulations and Administrative Requirements at State and Local Level:

Management of private forestlands in Minnesota is guided by numerous state statutes and rules. The Sustainable Forest Resources Act (SFRA) guides a large percentage of management of private and public forests. The SFRA was set up to "ensure the sustainable management, use and protection of the state's forest resources to achieve the state's economic, environmental and social goals." Additionally, the Minnesota Forest Management Act (MS § 89) is a very important body of legislation that provides guidance for forest-related planning, management, finance, forest development, and research (full text available at: <http://www.revisor.leg.state.mn.us/>).

The Minnesota Forest Resource Council (MFRC) has developed a set of forest management guidelines, referred to as "*Voluntary Site-level Forest Management Guidelines*," which many private landowners adopt as their standard procedures. According to the MFRC website (www.frc.state.mn.us/FMgdline/Guidelines.html): "*The guidelines are a menu of valuable decision-making tools for landowners, resource managers, and loggers seeking to maintain forest sustainability. Guidelines balance social, economic, and environmental objectives for forest resources. They take into account resource needs, landowner objectives, forest characteristics, existing regulations, economics, and the best information about forest*

resources available at any given time.”

Other resources for private woodland managers in Minnesota include the MN DNR’s Forest Stewardship Program (<http://www.dnr.state.mn.us/grants/forestmgmt/stewardship.html>), which is a state-run voluntary program designed to provide technical advice and long range planning to interested landowners.

1.2.1 Environmental Context

Most of the forests of the Lake States region were first established at the end of the last glacial period, roughly 12,000 years ago. The forests currently found throughout Minnesota fall under the classification as *temperate forest*. Of Minnesota’s 51 million acres, 16.3 million are forestland.

During the latter part of the 19th century and the first half of the 20th century, the forests throughout the Lake States region were heavily exploited through high grading, commercial clearcutting and widespread wildfire of high intensity due to massive amounts of logging slash. Much of the forest areas in Minnesota burned at least once during this period. As a result of this intensive past human intervention, the proportion of old-growth forest cover left in the state is well below the proportion prior to settlement.

Minnesota contains four ecological regions, known as provinces that are based on climate, geology, soil, and vegetation. These are the western and southwestern prairies, the northwestern prairie parklands, central and southeastern deciduous forest, and northeastern mixed coniferous-deciduous forest. Of interest here are the latter three provinces, also referred to respectively as the tall-grass aspen parklands, the eastern broadleaf forest and the Laurentian mixed forest.

The tall-grass aspen parkland province of northwestern Minnesota is a large ecotonal area in the basin of glacial Lake Agassiz between the prairie to the west and forest to the east. Historically, the interaction of fire with lands that were dry enough to burn or too wet to burn created a complex mosaic of prairie, wetlands, brushland, open woodland, and forest. Currently most of the province is cropped or pastured, but substantial natural vegetation persists. The remaining natural vegetation is a mosaic of brush prairie, wetlands, and woodlands. Woodlands are dominated primarily by aspen with some bur oak; balsam poplar is important on wetter sites. Most of the current woodland is a result of fire suppression. Several large Wildlife Management Areas (WMAs) in the province are managed for brushland species.

The eastern broadleaf forest may be further designated into xeric, mesic, and lowland forest communities depending on the degree of soil moisture. Xeric forests, which are found in dry areas, are characterized by sandy, porous, and nutrient-poor soils. Drought-tolerant species such as aspen and oak are typically found on these sites. Mesic forests have formed on rich soils derived from glacial till and loess. These generally occur on cooler northern slopes - areas with more moderate soil moisture. The close-canopied, stable maple-basswood forests, known as “Big Woods,” are found in these areas. Lowland forests exist on sites with

abundant soil moisture and are adapted to extremes ranging from spring flooding to summer drought. They feature a number of floodplain tree species including American elm, slippery elm, butternut, hickory, green ash, and cottonwood.

The Laurentian mixed forest province is the largest of the three ecological regions, covering two-fifths of the state in the north central and northeastern areas and is considered the true forested region of Minnesota. It may consist of continuous conifer, conifer-hardwood mix, or hardwood forest canopies. The forest communities common in this biome are: aspen, white pine, red pine, jack pine, black spruce-fernmoss, spruce-fir, and upland white cedar. The area's glacial history has resulted in a varied topography, from flat lake and outwash plains in the west, to hilly and rocky moraines in the mid-section.

Forest ecosystem disturbances to be noted are fires, windfall, and the presence of native and non-native insects and disease. High-intensity wildfires originate from both human (e.g., arson, debris, and campfires) and natural (e.g., lightning) sources. Each year, the DNR also burns 40,000 to 60,000 acres of land to mimic the effects of natural fires. The majority of these prescribed fires are in non-forest types such as prairies and brushlands. Most prescribed fires in forest types are low-intensity ground fires. These prescribed burns are beneficial particularly to white, red, and jack pine species, which regenerate after these fire events. Windfall is another considerable disturbance. Occasionally forests will undergo large-scale blowdowns, as in Crow Wing County in 1991 and the Boundary Waters Canoe Area Wilderness in 1999. Storms on July 4th of the latter year caused extensive damage to over 400,000 acres of forest and greatly increased the risk of wildfires.

The presence of native and non-native forest insects and pathogens is another ecosystem disturbance of note. Defoliating insects include the spruce budworm, pine jack budworm, and forest tent caterpillar. Pine bark beetles and two-lined chestnut borer also affect Minnesota's forests, as do fungal pathogens such as white pine blister rust and oak wilt. In May of 2009, the Emerald Ash Borer, an exotic wood-boring beetle from Asia that feeds exclusively on ash species (*Fraxinus* spp.) was detected in Minnesota. Although high value urban street trees are of most concern, northern Minnesota has an abundant black ash (*Fraxinus nigra*) resource.

1.2.2 Socioeconomic Context

The forest products industry has been an integral part of Minnesota's economy since settlement by Euro-Americans in the early 1800s. The peak of lumbering occurred at the turn of the century, following the addition of steam power and band saws. In 1900, 4.7 million cords of white pine were harvested, and the industry employed some 40,000 workers. In 2003, 3.7 million cords of mostly aspen are harvested, and Minnesota's forest industries employed close to 41,992⁵ people in both primary processing and secondary manufacturing jobs. However, since 2000 the state has experienced a decrease in product capacity due to machine shutdowns and divestitures, resulting in the loss of 1,000 related jobs. The more recent economic crisis of 2008 has brought a halt to nearly all timber production nationwide.

⁵ US Dept of Labor Statistics (2003) as reported by Minnesota Forest Industries in "Minnesota Forests: A Quick Look at the State of the Never-ending Resource

Many Minnesotans take advantage of the region's numerous outdoor recreational opportunities. Hunting, fishing, camping, off-highway vehicle riding, berry picking, skiing, and hiking are all activities on private and public lands. Hunting of deer, turkey, moose, black bears and other animals is a particularly important use of these forests.

The area's first land managers were the Native American inhabitants who followed game northward into the forests from the southwestern prairies. There is evidence suggesting that Native Americans used low-intensity prescribed burning to encourage berry growth and create more suitable habitat for game species. Today, there are nine federally recognized Indian tribes in Minnesota: Bois Forte Band of Chippewas; Fond du Lac Ojibwe; Leech Lake Band of Ojibwe; Mille Lacs Band of Ojibwe; Minnesota Chippewa Tribe; Red Lake Band of Chippewa Indians; Upper Sioux Indian Community; and White Earth Ojibwe.

Minnesota Forest History Center

<http://www.mnhs.org/places/sites/fhc/index.html>

Minnesota Department of Natural Resources

<http://www.dnr.state.mn.us>

Minnesota Indian Affairs Council

<http://www.mniac.org/>

1.3 Forest Management Enterprise

1.3.1 Land Use

TNCFN's only current member's property is in Crow Wing County, an area of glacial lakes in the Mississippi Valley where prairie, floodplain and northern hardwood species converge. The property has two ponds, a lake abutted by two kinds of wetlands, a powerline right of way, and two small home sites overlooking the lake, in addition to the forestland.

Crow Wing County is rural. Land cover classes include woodland (50-60%), wetland (25-30%), and agriculture and water (10-25%). Agricultural land use is on decline, while summer residencies on lakes have increased.

1.3.2 Partial Certification- Land Outside Scope of Certification

The home site and power line right-of-way combined total 10 acres.

1.4 Management Plan

1.4.1 Management Objectives

TNCFN's FSC Group Certification Program's Forest Management Manual includes a review of individual members' objectives as part of its application process. Individual members are expected to prepare a management plan that complies with TNCFN's and FSC's criteria.

The objectives from TNCFN's only current member are:

- *To improve the quality of the upland regenerating forest.*
- *To protect the integrity of the lake and the wetlands.*
- *To maintain and improve the trail system on the land.*
- *To produce quality wood products from the land.*
- *To provide recreational opportunities.*

1.4.2 Forest Composition

TNCFN's current member has areas of pine and hardwood regeneration, mature Red pine, even-aged oak, aspen, oak-aspen, mixed hardwood, and shrub and emergent wetlands. The current stand conditions are the result of industrial clearcuts, highgrades and soil-scorching fires that occurred during the late 19th and early 20th centuries. After the first wave of timber harvesting, the land was used for grazing. The current landowner has been restoring forest cover over grazed areas and improving the timber quality through a combination of plantings, natural regeneration, and TSI cuttings.

The oldest trees on site are in a red pine stand with a lesser component of white pine and mixed hardwoods. Some of the mixed oak stands were damaged during a windstorm about 20 years ago. Some scattered pockets of oak regeneration and other hardwood species are in these areas. The landowner has planted some white pine and white spruce with mixed success on the land in hopes of increasing species diversity and product options.

The shrub wetland contains Red alder (*Alnus rugosa*), willow (*Salix* sp.) and dogwood (*Cornus* sp.). Part of it also contains tree species, such as Black ash (*Fraxinus nigra*) and Tamarack (*Larix laricina*). The other wetland contains grasses, sedges, rushes, and cattails.

1.4.3 Silvicultural Systems

The TNCFN group member employs even-aged and all-aged systems of silviculture on a small scale. Even-aged systems include clearcuts and shelterwoods for regenerating aspen and oak stands, respectively. Thinning can be used to create two-aged stands of aspen. Individual tree selection can be used in areas that need timber stand improvement or with species that are shade tolerant. Group selection can be used to create small regeneration openings where so desired. The landowner has also reserved the option to plant white spruce below some aspen and oak stands to provide wildlife cover and silvicultural options.

1.4.4 Management Systems

TNCFN's only member has one FMU organized into 11 stands, including wetlands. It is expected that future members will have a single FMU organized into stands.

TNCFN has detailed the division of responsibilities of the group manager and group members in its Forest Management Manual:

A. Group Entity / Group Manager Level

TNCFN serves as the Group Entity (also referred to as the Group Manager) for the Network.

The Group Manager is the FM certification applicant and will hold the FM certificate once it is issued.

The Group Manager is contractually responsible to the certification body and its auditors for ensuring that the Group Members enrolled in the program and covered by the FM certificate fully meet the requirements of all relevant FSC policies, guidelines, and standards. The Group Manager is also responsible for:

- Communicating with the certification body
- Ensuring that the requirements of the FSC Principles and Criteria for Forest Stewardship are met in the forestland covered by the certificate
- Ensuring that any conditions on which certification is dependent and any corrective action requests issued by the certification body thereafter are fully implemented
- Communicating with the Group Members
- Collecting group membership fees for payment of all the costs of certification, auditing, monitoring, managing, and reporting throughout the period of validity of the certificate
- Implementing the administrative and management requirements of the group certification program
- Maintaining membership records
- Implementing management and monitoring at the group and Group Member level
- Providing information and training to Group Members
- Removing Group Members from group certification if they do not comply with requirements of group membership or any corrective action requests issued by the certification body or the Group Manager
- Submitting requests to the certification body for authorized logo use
- Reviewing and approving the use of the FSC Trademarks by Group Members under specific conditions
- Promoting awareness of the Group Members' FSC certified products to potential customers

B. Group Member Level

Forestland owners that participate in the Network shall have met the eligibility and membership requirements and have been accepted into the Network as Group Members.

The Group Members are responsible for:

- Complying with all Group Member and FM certification requirements
- Developing forest management plans
- Implementing any requirements within their forest management plans and operations as necessary to demonstrate compliance with the FSC standards, policies, procedures, and
- Maintaining of monitoring and other required records
- Utilizing the Group Entity's FM/CoC code in relevant sales documents in compliance with reference to the Group Entity
- Addressing any non-conformances or corrective action requests that are identified at their level (or risk removal from the group certification program)
- Verifying ownership of the forestland covered by the certification

Group Members do not hold individual FM certificates. So long as they comply with all the requirements of group membership, they are covered by the Group Entity's FM certificate. All Group Members shall have a formal written Member Participation Agreement with the Group Manager. Group Members are responsible for addressing any non-conformances that are identified (or risk removal from the Network).

1.4.5 Monitoring System

TNCFN is responsible for the initial evaluation of group members and monitoring each group members' compliance with Corrective Action Requests (CARs) as issued by the certification body or the group manager. Group members are also responsible for maintaining their own monitoring records, such as forest inventory, faunal surveys, property

boundary marking, high conservation values, etc. TNCFN’s Forest Management Manual’s group member application includes a first level of review for checking whether or not a member has a monitoring program.

TNCFN’s current group member conducts the follow monitoring activities on the Esden Lake property:

- 1) Annual boundary line inspections with paint marking as necessary.
- 2) Regular monitoring of entry and exit trails- for trespass and downed material on trails.
- 3) Informal monitoring of disease, insect populations, and pests: includes butternut canker inspections, ips beetle exit hole counts, blister rust "flag" trees in pine areas, and beaver damage near ponds.
- 4) Formal monitoring of growth rates on thinned red oaks, red pines and aspens. Tally sheets updated every two years on these sites.
- 5) Monitoring of erosion on all trails and roads, with regular maintenance which includes grading, blading, seeding and sometimes addition of culverts and class 5 material.
- 6) Informal monitoring of wildlife species found on property. New species seen in past two years include Wild turkeys, Sandhill cranes and Timberwolves.

1.4.6 Estimate of Maximum Sustainable Yield

TNCFN relies on its group member, who is a qualified professional forester, to conduct his own forest inventory with which to base estimates of maximum sustainable yield or allowable harvest rates. TNCFN’s group member uses a combination of forest inventory based on sampling and a network of permanent oak trees to measure growth rates. Inventory takes place every 5-10 years to gather data on species composition, timber quality, downed woody debris, snags, regeneration, and growth rates. Site indexes are created based on data at the stand level. Permanent oak crop trees are measured biennially. The oak growth data and applied Scrivani (1989) formula demonstrate that oak volume has increased from 131 BF to 202 BF during the period from 1996 to 2008.

1.4.7 Estimated, Current and Projected Production

The Bundy property’s growth and harvest summary is as follows in the chart below:

	1980	Harvest	1990	Harvest	2000	Harvest	2010 est
Esden Lake	165 acres		180 acres		210 acres		160 acres
Oak: cds	300	20	450	60	350	None	350
Oak: MBF	40	10	60	40	45		75
Pine: MBF	75	40	70	35	65		75
Aspen:cords	400	150	350	160	300		300
MH: cds	50		100	30	150		250

The forest manager collects diameter and height data during a continuous forest inventory system to make estimations of volume and growth. As previously explained, this inventory takes place every 5-10 years. Note that the acreage has changed throughout the years. The

Esden Lake property is now five acres smaller than it was in 1980. All timber volumes, with the exception of aspen, show an increasing trend over time from 1980-2010 (projected). This is most likely due to the landowner's management for softwoods and precious hardwoods that are longer-lived than aspen, higher rates of harvest for aspen, and predation from animals, such as local beavers. However, from 2000 to 2010, aspen growth is expected to remain steady. The forest manager employs a mixture of even- and uneven-aged management techniques to add volume and regenerate desired species.

1.4.8 Chemical Pesticide Use

TNCFN's only current member does not employ chemical pesticides or herbicides.

MWEPTNCFN includes a review of chemical use in its evaluation of potential group members.

1.5 SLIMF Qualifications

TNCFN's only group member is 181 acres in size, well below the 1000 hectare limit (2,471 acres).

2.0 GUIDELINES/STANDARDS EMPLOYED

As the applicant forest property is located in central Minnesota, the certification evaluation that is the subject of this report was conducted against the duly-endorsed Lake States-Central Hardwoods Region Version 3.0 (Accredited August 5, 2002 and last modified February 10, 2005). The standard is available at the FSC-US web site (www.fscus.org) or is available, upon request, from Scientific Certification Systems (www.scscertified.com).

3.0 THE CERTIFICATION ASSESSMENT PROCESS

3.1 Assessment Dates

The full certification evaluation took place on June 2, 2009.

Main Evaluation:

3.2 Assessment Team

Kyle Meister, M.F. – Lead auditor and Certification Forester with Scientific Certification Systems. Recent audits include the Mendocino Redwood Company's Resource Manager Program, Michigan DNR, Trout Mountain Forestry, Collins-Lakeview, Humboldt Redwood Company, Los Olivos y Otros, Fort Lewis, and Cal Poly Swanton Pacific Ranch. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan. He recently completed a Master of Forestry degree at the Yale School of Forestry and Environmental Studies. He has experience as an environmental educator and natural resource consultant in the U.S., Mexico, Ecuador, Costa Rica, and Colombia.

3.3 Assessment Process

3.3.1 Itinerary

June 1, 2009 – TNCFN Offices, St. Paul, MN

- Brief visit to TNCFN offices in St. Paul to review logistics and retrieve Bundy Property Management Plan.

June 2, 2009 – Bundy Property, Crow Wing County, MN

- Aspen cut (1983) - some TSI work planned for 2009
- Salvage cut and reforestation with white pine and white spruce
- 100 yr. old Red pine – managed for old growth values
- Oak-Birch stand – white pine reforestation failure
- Wind-storm damage site – non-active management area
- White pine planting experimentation site
- Future harvest site – possible aspen removal or oak shelterwood system

June 2, 2009 – Closing meeting, Crow Wing County, MN

- Issuance of initial CARs and RECs and general conclusions of the audit

3.3.2 Evaluation of Management System

The auditor reviewed TNCFN’s documentation and the Bundy Property management plan before and during the audit. The auditor discussed TNCFN’s policies as outlined in the Forest Management Manual with TNCFN staff and P. Bundy to determine whether or not they were being implemented.

3.3.3 Selection of FMU’s to Evaluate

The forest management operation undergoing certification currently consists of a single Forest Management Unit.

3.3.4 Sites Visited

See the itinerary for sites visited on the FMU. Rationale for site selection included past management practices, disturbance, and discussions of future harvest options.

3.3.5 Stakeholder Consultation

Pursuant to SCS protocols, consultations with key stakeholders were an integral component of the evaluation process. Consultation took place prior to, concurrent with, and following the field evaluation. The following were distinct purposes to the consultations:

To solicit input from affected parties as to the strengths and weaknesses of TNCFN group management program, relative to the standard, and the nature of the interaction

between the company and the surrounding communities.

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

Principal stakeholder groups of relevance to this evaluation were identified based upon results from the scoping evaluation (if applicable), lists of stakeholders from TNCFN, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders:

- TNCFN employees and group members, including headquarters and field
- Local and regionally-based environmental organizations and conservationists
- Local, State and Federal regulatory agency personnel

Prior to, during, and following the site evaluation, a wide range of stakeholders from the regional area were consulted in regard to their relationship with TNCFN, and their views on TNCFN’s group management program and group members’ forest management. Stakeholders included FSC contact persons, government and non-government organizations involved in forest management, local citizens and groups, employees, contractors, and others. Stakeholders were contacted with a notification mailing soliciting comment and/or phone contact. Comments were received via meetings and personal interviews “face-to-face”, phone interviews (“Interview”), and through written responses. Individuals or groups not offering feedback are labeled “no response” (“NR”). Additional comments may have been received from individuals not wishing to reveal their identities.

Name	Affiliation	Consultation
Lois Norgard	Sierra Club Forests Committee	Interview
Minnesota Audubon		NR
USFS – NE Area State & Private Forestry		NR
Friends of the Mississippi River		Interview

3.3.5.1 Summary of Stakeholder Concerns and Perspectives and Responses from the Team Where Applicable

Economic Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> • None 	NA

Social Concerns

Comment/Concern	Response
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<ul style="list-style-type: none"> • I have not heard of TNCFN. 	Comment noted.
<ul style="list-style-type: none"> • I think that the FSC process is appropriate for private and state forests. 	Comment noted.

Environmental Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> • Water quality and protection, floodplain and upland forests in the Mississippi River fly way are of specific concern and focus for us. 	See REC 2009.5
<ul style="list-style-type: none"> • I am concerned that private landowners may not have adequate review for HCVF classification. 	TNCFN's first level of review for determining the presence of HCVPs in Minnesota relies on the MN Natural Heritage Database and the MN County Biological Survey, both of which are well-regarded tools. TNCFN's HCVP review could be improved in its riparian and old growth review as detailed in REC 2009.5.

3.4 Total Time Spent on audit

Approximately one auditor day was spent on the full evaluation and 1 day writing the report.

3.5 Process of Determining Conformance

FSC accredited forest stewardship standards consist of a three-level hierarchy, principle, then the criteria that make up that principle, then the indicators that make up each criteria. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each non-conformance must be evaluated to determine whether it constitutes a major or minor non-conformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-conformance. The team must use their collective judgement to assess each criterion and determine if it is in conformance. If the forest management operation is determined to be in non-conformance at the criterion level, then at least one of the indicators must be in major non-conformance.

Corrective action requests (CAR's) are issued for every instance of non-conformance. Major non-conformances trigger major CAR's and minor non-conformances trigger minor CAR's

Interpretations of Major CAR's (Preconditions), Minor CARs and Recommendations

Major CARs/Preconditions: Major non-conformances, either alone or in combination with non-conformances of other indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out prior to award of the certificate. If major CAR's arise after an operation is certified, the timeframe for correcting these non-conformances is typically shorter than for minor CAR's. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

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

Recommendations: These are suggestions that the audit team concludes would help the company move even further towards exemplary status. Action on the recommendations is voluntary and does not affect the maintenance of the certificate. Recommendations can be changed to CARs if performance with respect to the criterion triggering the recommendation falls into non-conformance.

4.0 RESULTS OF THE EVALUATION

Table 4.1 below, contains the evaluation team's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. The table also presents the corrective action request (car) numbers related to each principle.

Table 4.1 Notable strengths and weaknesses of the forest management enterprise relative to the P&C

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/REC #s
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> ▪ TNCFN expects its group members to adopt Minnesota’s Site Level Guidelines. ▪ TNCFN group members protect their properties from unlawful entry. 	<ul style="list-style-type: none"> ▪ None. 	<ul style="list-style-type: none"> ▪ REC 2009.1
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> ▪ TNCFN group members have clearly defined boundaries. ▪ TNCFN group members maintain regular contact with neighbors. 	<ul style="list-style-type: none"> ▪ TNCFN’s stakeholder list is very long and in some cases outdated. 	
P3: Indigenous Peoples’ Rights	<ul style="list-style-type: none"> ▪ Landowners in Minnesota can consult the Minnesota Historical Society’s Cultural Heritage database for information on cultural sites of indigenous peoples. 	<ul style="list-style-type: none"> ▪ None 	<ul style="list-style-type: none"> ▪ None
P4: Community Relations & Workers’ Rights	<ul style="list-style-type: none"> ▪ TNCFN group members employ local contractors. ▪ TNCFN group members participate in forestry educational events. 	<ul style="list-style-type: none"> ▪ TNCFN lacks review of socioeconomic indicators in its program, such as local job creation. 	<ul style="list-style-type: none"> ▪ CAR 2009.1
P5: Benefits from the Forest	<ul style="list-style-type: none"> ▪ Much of the products harvested are used locally. ▪ Utilization is excellent. ▪ Research into lesser-used species regionally is good. 	<ul style="list-style-type: none"> ▪ Once TNCFN has members who harvest NTFPs, it will have to address relevant indicators. 	<ul style="list-style-type: none"> ▪ None

P6: Environmental Impact	<ul style="list-style-type: none"> ▪ Harvest prescriptions detail sensitive and restricted areas in a clear and efficient manner. ▪ There is a fair amount of structural diversity on member properties. 	<ul style="list-style-type: none"> ▪ The Emerald Ash Borer could affect established silvicultural regimes and protected areas. ▪ TNCFN must address elements of representative samples in its public summary. 	<ul style="list-style-type: none"> ▪ CAR 2009.2, REC 2009.2, REC 2009.3
P7: Management Plan	<ul style="list-style-type: none"> ▪ TNCFN group member management plans follow a MN DNR template that covers many FSC indicators. ▪ Maps are plentiful and easy to read. ▪ Management options are clearly described and provide an intended outcome. 	<ul style="list-style-type: none"> ▪ TNCFN must ensure that it follows up on the levels of review it has established in its program manual. ▪ Assessment and monitoring of socioeconomic indicators can be difficult for group management programs. 	<ul style="list-style-type: none"> ▪ CAR 2009.1, CAR 2009.3, CAR 2009.4, REC 2009.3, REC 2009.4
P8: Monitoring & Assessment	<ul style="list-style-type: none"> ▪ TNCFN group members employ pre- and post-harvest inspections. ▪ Many terrestrial and aquatic features are monitored informally at a level that goes above what most small landowners are capable. 	<ul style="list-style-type: none"> ▪ TNCFN must ensure that it follows up on the levels of review it has established in its program manual. ▪ TNCFN currently lacks a public summary of management activities and monitoring. 	<ul style="list-style-type: none"> ▪ PRE 2009.1, CAR 2009.1, CAR 2009.4, CAR 2009.5, REC 2009.3
P9: Maintenance of High Conservation Value Forest	<ul style="list-style-type: none"> ▪ TNCFN's use of the MN Natural Heritage Database and MN County Biological Surveys should help landowners uncover potential HCVPs with ease. 	<ul style="list-style-type: none"> ▪ TNCFN could improve its HCVP review through including guidelines for old growth and forest that provide services in critical situations. ▪ TNCFN must ensure that it follows up on the levels of review it has established in its program manual. 	<ul style="list-style-type: none"> ▪ CAR 2009.4, REC 2009.5

4.2 Preconditions

Preconditions are major corrective action requests that are placed on a forest management operation after the initial evaluation and before the operation is certified. Certification cannot be awarded if open preconditions exist.

<p>Non-Conformity: TNCFN does not have a public summary outlining the results of monitoring as described in 8.5.a. Although TNCFN has yet to conduct any monitoring, it is relying on its group members to have a thorough knowledge of FSC and therefore must be prepared to handle oversight and summarizing its group members' monitoring programs as well as its own.</p>	
<p>PRE 2009.1</p>	<p>TNCFN shall develop a template for the creation of a public summary of the results of monitoring indicators, including those listed in C8.2. TNCFN must also provide a timeline of monitoring activities to take place and how regularly the public monitoring summary will be updated.</p>
<p>Deadline</p>	<p>Prior to award of Certification.</p>
<p>Reference</p>	<p>FSC Criterion 8.5</p>
<p>TNCFN Response July 23, 2009</p>	<p>Included within the group manager's program manual, TNCFN has developed a template "Annual Report Form" which summarizes recent activities, changes in forest conditions, yield of products, harvesting activities and other activities. Additional monitoring (as exemplified by the current group member) can be pursued as needed to meet specific landowner objectives and in conjunction with specific activities (e.g., regeneration monitoring when harvest activities are planned). These categories of reporting are consistent with C8.2 which identifies yield of forest products, growth rates, regeneration, forest conditions, changes in flora and fauna, harvest impacts and management efficiency as indicators to be monitored. This method and level of monitoring intensity is consistent with the scale and intensity of the group certification program.</p> <p>The information gathered annually through this reporting mechanism will be summarized (for reporting to the TNCFN board) and the same information, excepting personal or sensitive data, can be made available to the public at a reasonable fee and upon request. The intention to establish this reporting practice is articulated on page 8 of the program manual, cited below:</p> <p>"The Group Manager will provide public access to summary information about the group as needed to support stakeholder consultation and to comply with the FSC standards. Upon request, summary information will include the number of Group Members, enrolled acreage, distribution of certified lands (e.g., acres per county), management activities summaries and high conservation value forest activities. Sensitive and confidential private and</p>

	<p>business information will not be included in public summaries.”</p> <p>The paragraph could be edited to include the phrase “a summary of monitoring activities.”</p>
<p>SCS comment August 31, 2009</p>	<p>It is SCS’ understanding that the “Annual Report Form” as it currently reads is intended for compliance with annual monitoring requirements detailed in Criterion 8.2 and for TNCFN’s own internal monitoring procedures, which does not necessarily satisfy the public disclosure required under Criterion 8.5. However, this “Annual Report Form” does satisfy the timeline of monitoring activities requested as SCS assumes it will be conducted annually.</p> <p>SCS agrees with TNCFN’s suggestion on adding a phrase to the paragraph on page 8 regarding the summary of monitoring activities. This indeed will make public summary requirements clearer to TNCFN’s group members.</p> <p>As TNCFN is a new program with less than one year of operations, it is clear that a complete public summary likely will not exist until it completes year of operations. However, under Criterion 8.5, FSC protocols demand a public summary of monitoring activities regardless of how long an organization has been operating.</p> <p>In its response to this precondition, TNCFN has detailed how it will gather information for the public monitoring summary and how it can modify its annual report for board to create a public summary, BUT still has not provided a TEMPLATE for the public monitoring summary. Is it also TNCFN’s intent to update the public summary annually along with the board report? TNCFN still must detail how regularly the public monitoring summary will be updated.</p>
<p>Disposition of Precondition August 31, 2009</p>	<p>The timeline for monitoring activities portion of this precondition has been satisfied.</p> <p>TNCFN still must provide a template for the public monitoring summary and outline how frequently the public monitoring summary will be updated.</p> <p>As of August 31, 2009, this precondition remains open.</p>
<p>TNCFN Response and SCS Comment September 2009</p>	<p>TNCFN provided a template for the public summary of monitoring activities in an amendment to their group certification manual. The section is titled “Annual Summary of Monitoring Activities” and includes provisions to summarize elements of criterion 8.2 without infringing upon proprietary information of group members.</p>
<p>Disposition of Precondition</p>	<p>As of September 11, 2009, this precondition is closed.</p>

5.0 CERTIFICATION DECISION

5.1 Certification Recommendation

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team hereby recommends that the True North Certified Forestland Network (TNCFN) be awarded FSC certification as a “Well-Managed Forest” subject to the corrective action requests stated in Section 5.2. TNCFN has demonstrated that their system of management is capable of ensuring that all of the requirements of the Lake States-Central Hardwoods Region, Version 3.0 are met over the forest area covered by the scope of the evaluation. TNCFN has also demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.

5.2 Initial Corrective Action Requests and Recommendations

Non-Conformity: TNCFN’s first level of review of potential group members’ management plans does not include a description of socioeconomic issues. TNCFN’s group membership program does not include monitoring of social and economic impacts, which may be helpful in determining TNCFN’s overall level of effectiveness as an organization that brings the benefits of certification to different groups.	
CAR 2009.1	TNCFN shall identify the most relevant socioeconomic issues to cover in its first-level review of potential group members. TNCFN shall include a level of review and monitoring for the creation or maintenance of local jobs of its group members and maintain a record of public responses to its group members’ management activities as part of its social assessment. TNCFN may also identify other important socioeconomic factors as it deems fit to include in monitoring.
Deadline	Annual Audit 2010
Reference	FSC Indicators 4.4.c, 7.1.b.5, and 8.2.d.2
TNCFN Response	<p>TNCFN does not believe there is a non-conformance to the referenced indicators.</p> <p>Given that the group includes only private lands, compliance with 4.4.c is demonstrated by the fact that the landowner himself prepared/approved his own management plan (e.g., the most directly affected person(s) were consulted and that person’s concerns were addressed). The auditor observed that the landowner maintains regular contact with his neighbours. In addition, TNCFN prepared and developed the structure of the program with input from external parties, board members, potential group members and others as documented through the education and training process that preceded the certification audit.</p> <p>To address 7.1.b.5, given that the management plans for group members are written to address small-scale, private properties, it is</p>

	<p>not clear what additional cultural and socioeconomic issues should be included in a plan besides those identified as landowner objectives. Indicator 7.1.b.5 suggests addressing relevant issues and provides the examples of traditional and customary rights of use, access, recreation uses and employment, composition of the workforce, stability of employment, changes in forest ownership and tenure and ceremonial and archaeological sites. TNCFN finds that these areas are addressed to the extent that they are relevant to the property being reviewed. For example, the landowner allows neighbours to hunt deer on his property.</p> <p>In relation to 8.2.d.2, TNCFN maintains communications with the Utilization and Marketing Staff of the MN DNR, which have statewide authority to track and report on employment trends and other socioeconomic issues within the forest sector. TNCFN believes that it is the responsibility of the MN DNR and other public agencies to monitor the creation or maintenance of local jobs and public responses, and TNCFN supports these efforts by sharing information about their programs and efforts with the MN DNR. It is not clear what a socioeconomic review and analysis by TNCFN would add to the analysis conducted by the MN DNR given the extremely small scale of TNCFN group membership. The True North Woods, Minnesota Wood Campaign and other affiliated projects of TNCFN are actively working to promote growth within the sector and greater market recognition of forest-based products derived from Minnesota’s North Woods. Success in these endeavours is measured by growth in membership in these initiatives and feedback received from members during annual meetings and other events. TNCFN helps organize an annual “Goods from the Woods” tradeshow and Green Living Celebration that further emphasizes the availability of local wood products.</p>
<p>SCS Response</p>	<p>TNCFN’s current only group member has much experience working with the FSC Principles and Criteria. TNCFN therefore did not have to rely fully on its own review mechanism to ensure many of the socioeconomic elements included in his management plan. The fact that there was only one group member at the time of the audit works both to TNCFN’s advantage and disadvantage. Please keep in mind that SCS is evaluating TNCFN’s capabilities just as much as its group members. In order to be fair, SCS must consider both of these factors when assessing conformance. TNCFN mentioned during the audit that it is relying on its group members to be familiar with the standards and to have a management plan for it to review to assess membership potential. Under TNCFN’s model, the more independent a group member can act, the better TNCFN can balance its time between monitoring group members’ conformance to FSC P&C and assisting group members with marketing and selling their</p>

	<p>products. Therefore, the more that TNCFN assesses up front, the more secure it can be in a potential group members' capability of being in conformance to the FSC P&C.</p> <p>SCS does recognize that TNCFN's "Application for Membership" form contains a line item for "Number of Employees," and the Management Plan review in the same application contains line items for cultural sites, tribal consultation, and MN DNR's Forest Stewardship Plan, the latter of which, according to http://www.dnr.state.mn.us/grants/forestmgmt/stewardship.html and http://na.fs.fed.us/stewardship/index.shtm, does not necessarily cover socioeconomic issues detailed in 4.4.c and 7.1.b.5. The TrueNorth Manual Management Plan review on page 14 contains line items for endangered species, chemical use, HCVPs, and exotic species, but why not a level of review for management plans to cover elements of 4.4.c and 7.1.b.5 based on the scale and intensity of group members' operation? TNCFN still must identify the most relevant socioeconomic issues, in addition to the "number of employees," to cover in its first-level review of potential group members.</p> <p>SCS finds TNCFN's response to indicator 8.2.d.2 to be satisfactory. TNCFN need not expand its analysis at this time.</p>
Disposition of CAR	<p>The components addressing indicators 4.4.c and 7.1.b.5 remain open; TNCFN's response to 8.2.d.2 is satisfactory.</p> <p>This CAR is OPEN.</p>

Non-Conformity: TNCFN has no public summary to detail the process and rationale used to determine the size and extent of representative samples of ecosystems.	
CAR 2009.2	TNCFN shall include a description of the process and rationale used to determine the size and extent of representative samples of existing ecosystems as detailed in C6.4 in its public summary.
Deadline	Annual audit 2010
Reference	FSC Indicator 6.4.f.
TNCFN Response	<p>TNCFN's description of the process and rationale for determining the size and extent of representative samples is as follows and this information will be added to the program manual provided to the group members and available to the public upon request:</p> <p>"Criterion 6.4 of the FSC standard provides guidance for meeting the FSC requirements for determining representative samples of existing ecosystems. Members of the True North Certified Forestland Network must follow the guidance included within the standard. As the standard acknowledges, the protection of representative samples of existing ecosystems is primarily the responsibility of public land managers. The standard also acknowledges that known protected off-</p>

	ownership areas that are in proximity to the management unit may be used to meet the goal of representative samples in the landscape. The owner or manager of a small forest (defined by FSC as <2,500 acres) may not be expected to designate representative samples of commonly occurring forest types. Minnesotans enjoy an expansive system of public and protected lands, including the Boundary Waters Canoe and Wilderness Area (BWCWA), more than 70 state parks, and state, county and federal forest lands as well as private reserve areas (e.g., lands managed by The Nature Conservancy). If a group member identifies a unique existing ecosystem on their property via a Natural Heritage Database review or other observation or research, this identified area may be considered for protection as a representative sample or High Conservation Value Forest in keeping with the guidance included within C6.4 of the FSC standard.”
SCS response	Given the scale and intensity of TNCFN’s program, SCS finds that the addition of this paragraph to the Group Management Manual will satisfy this CAR.
Disposition of CAR	SCS will verify the addition of this language to the Group Management Manual during the first annual audit. As such, this CAR remains open.

Non-Conformity: The Bundy Management Plan currently has no established short- and long-term objectives as required by the regional standard. These objectives must be measurable in order to be evaluated over time.	
CAR 2009.3	TNCFN shall ensure that the Bundy Management Plan’s written objectives include short- and long-term ecological, social, and economic goals and objectives that are specific, achievable, and measurable. Considerations for different species’ growth rates and economic cycles are some of the factors that can be used to define short- and long-term objectives.
Deadline	Annual audit 2010
Reference	FSC Indicator 7.1.a.1.
TNCFN Response	TNCFN will request that the landowner (who is also the forester and plan writer) provide a response to this CAR. TNCFN believes that the objectives identified within the plan and the level of detail is appropriate given the scale and intensity of forest management that is occurring on the property. The track record of management on the property further demonstrates a commitment to responsible, goal-based management.
Disposition of CAR	This CAR is open.

Non-Conformity: Although a document review and site visit to the Bundy Property confirmed that TNCFN's group member possessed the relevant documentation to assess conformance with the criteria, TNCFN did not conduct all of the levels of review established in its own Forest Management Manual and the SCS Group Certification Standards before including the Bundy Property in its group certification program.	
CAR 2009.4	TNCFN must ensure that its members <u>provide access to and/or</u> copies of documentation required by the SCS Group Management Standard and TNCFN's own Forest Management Manual. These include ownership documents, timber volume information, silvicultural systems, annual harvest rates, provisions for monitoring growth and dynamics, species selection, inventorying and monitoring practices, equipment, exotic species, High Conservation Values, and Cultural sites and historical resources. Once <u>TNCFN has reviewed</u> these documents, TNCFN must determine what follow up actions, if any, are required to ensure that group members are adequately prepared to participate in its program.
Deadline	Annual audit 2010
Reference	FSC Criteria 7.1.d., 7.1.e., 8.1, 9.4 and SCS Group Certification Standard Indicators 4.a.iii and 4.a.v.
TNCFN Response	TNCFN will collect and prepare the documents and materials necessary to complete the review process outlined in the manual while respecting private landowner rights and confidentiality issues related to sensitive information. TNCFN reserves the right to review original documents (that are kept by the group member) during on-site visits or other meetings without retaining copies of all relevant documents and records. The TNCFN review process will document the review of these materials and notes will be included within the member files.
Disposition of CAR	This CAR is open.

Non-Conformity: Based on data, P. Bundy appears to conduct inventory every two years. However, a comprehensive monitoring schedule is not described in the management plan.	
CAR 2009.5	The P. Bundy management shall include a schedule of all monitoring activities for inclusion in the management plan.
Deadline	Annual Audit 2010
Reference	FSC Indicator 8.1.a.
TNCFN Response	TNCFN will request that the landowner (who is also the forester and plan writer) provide a response to this CAR. All group members are required to provide annual reporting of activities, forest product yields and changes in forest conditions via the Annual Report Form included within the program manual.
Disposition of CAR	This CAR is open.

Background/Justification: TNCFN has not conducted an analysis of applicable international agreements.	
REC 2009.1	TNCFN should consult with the Minnesota DNR, which has prepared a written protocol outlining the acceptance of binding international agreements including CITES.
Reference	FSC Indicator 1.3.a.
TNCFN Response	TNCFN will send a message to Rebecca Barnard (Rebecca.Barnard@dnr.state.mn.us) the Forest Certification Coordinator at the MN DNR to request this information. If the information is provided by the MN DNR, TNCFN will make it available to group members.
Disposition of REC	This REC remains open.

Background/Justification: TNCFN's overarching management plan currently cites FSC's 2005 pesticide policy.	
REC 2009.2	TNCFN should review and cite the 2007 version of FSC's pesticide policy in all future correspondence and change this reference in its overarching management plan.
Reference	FSC Indicator 6.6.a.
TNCFN Response	TNCFN will update the program manual to reflect current FSC policies, including the 2007 version of the FSC's pesticide policy.
SCS response	TNCFN sent evidence of this update to its program manual in September 2009.
Disposition of REC	This REC can be closed.

Background/Justification: The Emerald Ash Borer (EAB; <i>Agrilus planipennis</i>) was recently detected in Minnesota. While the primary concern is for higher value urban ash trees (<i>Fraxinus</i> spp.) at this time, Minnesota contains a significant amount of ash grown for timber, old growth, and American Indian cultural values. The Minnesota DNR and Federal agencies have conducted an analysis of the state's ash resource.	
REC 2009.3	<ol style="list-style-type: none"> 1. TNCFN should ensure that all of its members follow state and federal protocols for the ash quarantine, especially as it relates to the transport of firewood and other products. 2. TNCFN members should consult ash resource maps prepared for Minnesota to evaluate their risk of infestation. There are maps on current infestations and concentrations of rural ash resources (e.g., remote sensing data). 3. TNCFN should investigate silvicultural systems, biological and chemical control, and other strategies for controlling EAB that minimize negative environmental effects. 4. TNCFN should develop a program for <ol style="list-style-type: none"> a. Detecting and monitoring EAB on member properties.

	<ul style="list-style-type: none"> b. Avoiding the introduction of EAB onto member properties. c. Implementing silvicultural, biological, chemical and other methods to control EAB and protecting healthy or high value ash trees. d. Participating in state and national efforts to document and collect genetic stock of ash. <p>5. TNCFN group members should address the potentially disruptive effects of EAB as they relate to allowable cut and include this and TNCFN's EAB Contingency Plan in the management plan.</p>
Reference	FSC Criteria 6.1 and Indicators 6.6.b, 6.9.d, 7.1.d.3, 8.2.b.1
TNCFN Response	<p>TNCFN agrees that EAB is a significant threat to the state's ash resources and supports efforts underway by the MN DNR and other public agencies to educate the public and assist private landowners with responding to the threat. A robust statewide detection and monitoring program for EAB has been developed by the Department of Agriculture and includes a program for training early detectors. TNCFN will make sure that information about these programs and resources are available to the private woodland owners enrolled in the group certification program and that group members have the latest and best available science related to responding to the threat of EAB.</p> <p>Information about EAB in Minnesota is available from the Minnesota Department of Agriculture website: http://www.mda.state.mn.us/plants/pestmanagement/eab.htm</p>
SCS Response	SCS finds that TNCFN's response is satisfactory and will monitor TNCFN's group program participation in EAB control and management efforts.
Disposition of REC	This REC can be closed.

Background/Justification: The Bundy Management plan lacks a description of Esden Lake's fish resource. Lake protection is part of its objectives and P. Bundy already has collaborated with MN DNR officials on fisheries in Esden Lake. Fish and/or invertebrate assessments might help in monitoring and establishing baseline conditions in water quality.	
REC 2009.4	P. Bundy should consider including a section in the management plan on Esden Lake's fish resource and any activities that may influence it, including his cooperation with the MN DNR.
Reference	FSC Indicator 7.1.b.1
TNCFN Response	The MN DNR, Minnesota Pollution Control Agency (MPCA) and related public agencies have statewide authority for conducting water quality assessments. The management of fisheries within

	<p>public waters, the removal of vegetation, and other related behaviours are restricted activities in Minnesota. TNCFN will not encourage group members to engage in the management of fish resources outside of following site-level guidelines and other forestry management best management practices. TNCFN requires the use of the state’s voluntary site-level guidelines, which include measures to protect wetland and riparian areas. These guidelines provide the most direct and effective way to avoid and minimize any potentially negative impacts to water quality or riparian habitats due to forest management activities.</p> <p>Information about Minnesota’s Water Laws is available at: http://files.dnr.state.mn.us/waters/watermgmt_section/pwpermits/water_law_questions_and_answers.pdf.</p> <p>Information about the MPCA’s Lake Water Quality Assessment Program is available at: http://www.pca.state.mn.us/water/lakequality.html</p>
SCS Response	This recommendation is specific to the Bundy Property and not TNCFN’s entire group management program.
Disposition of REC	This REC remains open.

Background/Justification: As TNCFN’s current member has no Old Growth or special ecological service areas, there is no reason to suspect a non-conformance with C9.1. However, TNCFN’s current first-level HC VF review process does not include an assessment for forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) or Old Growth. It also does not contain provisions for forest areas fundamental to meeting the basic needs of local communities.	
REC 2009.5	<p>In addition to the MN DNR’s Minnesota Natural Heritage Info System and Minnesota County Biological Survey that TNCFN requires its members to consult, TNCFN’s HC VF review should include a level (or levels) of review for determining Old Growth HC VFs and for forest areas that provide basic services in critical situations.</p> <p>TNCFN should consider developing a level of review for forest areas fundamental to meeting basic needs of local communities in anticipation of potential group members, such as forestlands on American Indian, church or boy/ girl scout properties.</p>
Reference	FSC Indicator 9.1.a
TNCFN Response	The MN DNR’s Natural Heritage System and County Biological Survey will identify occurrences of natural communities, including

	<p>occurrences of old-growth. The likelihood of previously unknown old-growth forest being discovered on a small-scale, privately owned forest in Minnesota is extremely remote given the land management history for the region, which includes extensive harvesting, burning and clearing for agriculture. These activities have been particularly prevalent on privately owned parcels. Information about the types of features identified through the NHIS is available at: http://www.dnr.state.mn.us/eco/nhnrp/nhis.html</p> <p>Regarding the second part of this recommendation, it does not seem appropriate for TNCFN, as a group manager working with small-scale, private woodlands, to encourage or develop a review process that would investigate properties outside of the scope of the certificate (e.g., Tribal lands, public lands or private lands not enrolled in the program.) TNCFN understands the HCVF review to be a component of the membership enrolment process that is initiated when a landowner or manager expresses interest in joining the group. The HCVF review will follow the guidance included within the FSC standard and as described in the group manual.</p>
<p>SCS Response</p>	<p>SCS contacted MN DNR Forest Ecologist, Kurt Rusterholz (651-259-5135), to investigate this matter further. The MN DNR's Natural Heritage Information System (NHIS) is the repository for data on locations of rare features, but old-growth forests are not tracked in this system. The Minnesota County Biological Survey (MCBS) collects data on rare species and native plant communities. Information on the location of rare species from the NHIS is available from the DNR through a license agreement. Data on native plant communities, essentially polygons classified using the Minnesota Native Plant Community Classification, are available only on DNR's Data Deli.</p> <p>Although MCBS ecologists may have identified old-growth forest stands in field notes, MCBS does not gather data designed to identify old-growth forest sites. At most, the NHIS/County Biological survey data can help to eliminate areas that do not contain old-growth, and there may be some old native plant community element occurrences (EOs) in the NHIS that were identified as old-growth. Rusterholz says that at this time the best way to identify areas of potential old-growth is through conducting a field inventory of locations that might be old-growth. Potential old-growth stands are most likely to be found in forests within areas identified by MCBS as Site of Outstanding or High Biodiversity Significance. Polygons for these High and Outstanding Sites are available on the DNR Data Deli. It is important to note that the DNR and other public land managers in Minnesota reviewed existing forest inventory data to identify candidate old-growth stands and then used a formal procedure to</p>

	<p>evaluate these sites in the field.</p> <p>It should be noted that not all counties in Minnesota have complete biological surveys.</p> <p>SCS thinks that it may have determined where some of the confusion of using the NHIS/MCBS surveys to detect old-growth may come from. The Minnesota DNR’s “Types of Old Growth” webpage states of following http://www.dnr.state.mn.us/forests_types/oldgrowth/types.html):</p> <p>“The old-growth forest types described here are based on DNR's classification of forest cover types. The cover type classification system is based on the most important tree species in the forest. The descriptions of old-growth forest cover types are general and old-growth characteristics vary considerably within a cover type. The native plant community classification documents this variation.”</p> <p>The link provided in the above quoted paragraph leads to the MN DNR’s Native Plant Community Classification webpage.</p> <p>In light Kurt Rusterholz’s comments, SCS stands by the first part of this recommendation. Moreover, TNCFN has not responded yet to the question of assessing HCVPs for forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control).</p> <p>The intent of the second part of the recommendation was not for TNCFN to consider lands outside of the scope of the certificate, but rather to consider a level of review for forest areas that belong to potential group members, such as Tribes, churches or boy/girl scout camps. If TNCFN does not yet intend to pursue any of these types of land ownerships, then it may not have a need for this review at this time.</p> <p>Again, as SCS bases this assessment on the results of one group member and TNCFN’s intent to pursue future group members who are highly capable of implementing the FSC P&C, SCS must ensure that TNCFN is able of providing sufficient initial review.</p>
<p>Disposition of REC</p>	<p>This REC remains open.</p>

6.0 SURVEILLANCE EVALUATIONS

If certification is awarded, surveillance evaluations will take place at least annually to monitor the status of any open corrective action requests and review the continued conformance of TNCFN to the Lake States-Central Hardwoods Region, Version 3.0. Public summaries of surveillance evaluations will be posted separately on the SCS website (www.scscertified.com).

7.0 SUMMARY OF SCS COMPLAINT AND APPEAL INVESTIGATION PROCEDURES

The following is a summary of the SCS Complaint and Appeal Investigation Procedures, the full versions of the procedures are available from SCS upon request. The SCS Complaint and Appeal Investigation Procedures are designed for and available to any individual or organization that perceives a stake in the affairs of the SCS Forest Conservation Program and that/who has reason to question either the actions of SCS itself or the actions of a SCS certificate holder.

A **complaint** is a written expression of dissatisfaction, other than **appeal**, by any person or organization, to a certification body, relating to the activities of staff of the SCS Forest Conservation Program and/or representatives of a company or entity holding either a forest management (FM) or chain-of-custody (CoC) certificate issued by SCS and duly endorsed by FSC, where a response is expected (ISO/IEC 17011:2004 (E)). The SCS Complaint Investigation Procedure functions as a first-stage mechanism for resolving complaints and avoiding the need to involve FSC.

An “**appeal**” is a request by a certificate holder or a certification applicant for formal reconsideration of any adverse decision made by the certification body related to its desired certification status. A certificate holder or applicant may formally lodge an appeal with SCS against any adverse certification decision taken by SCS, within thirty (30) days after notification of the decision.

The written Complaint or Appeal must:

- Identify and provide contact information for the complainant or appellant
- Clearly identify the basis of the aggrieved action (date, place, nature of action) and which parties or individuals are associated with the action
- Explain how the action is alleged to violate an SCS or FSC requirement, being as specific as possible with respect to the applicable SCS or FSC requirement
- In the case of complaints against the actions of a certificate holder, rather than SCS itself, the complainant must also describe efforts taken to resolve the matter directly with the certificate holder
- Propose what actions would, in the opinion of the complainant or appellant, rectify the matter.

Written complaints and appeals should be submitted to:

Dr. Robert J. Hrubes
Senior Vice-President
Scientific Certification Systems
2200 Powell Street, Suite 725
Emeryville, California, USA94608
Email: rhrubes@scscertified.com

As detailed in the *SCS-FCP Certification Manual*, investigation of the complaint or appeal will be confidentially conducted in a timely manner. As appropriate, corrective and preventive action and resolution of any deficiencies found in products or services shall be taken and documented.

SECTION B DETAILED RESULTS OF THE FULL EVALUATION

1.0 DETAILED EVALUATION OF CONFORMANCE

The findings and observations of the evaluation team are presented in this section, structured according to the 9 applicable FSC Principles. To follow are brief descriptions of each Principle, Criterion, and Indicator and the team’s findings and judgments at the Criterion and Indicator level.

Lake States-Central Hardwoods Region (USA) Regional Forest Stewardship Standard Version 3.0, 2/10/2005

* Criteria marked with an asterisk are fatal flaws, as determined by the working group.

C = Overall conformance with criterion or indicator

C/NC = Overall conformance with criterion, but there are non-conformances at the indicator level

NC = Non-conformance with criterion or indicator.

REQUIREMENT	C/NC	COMMENT/CAR
P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
C1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
1.1.a. Forest management plans and operations comply with federal, state, county, municipal, and tribal laws, case law, and regulations. <i>For example:</i> <ul style="list-style-type: none"> • All necessary permits are obtained. • There is neither evidence nor substantial claims of continued or intentional non-compliance with laws and regulations that relate to forest management by the forest owner or manager. 	C	On private lands, Minnesota has voluntary site-level guidelines for wetlands, riparian areas, roads, retention, buffers, biomass harvesting, natural heritage, etc. TNCFN provides references to state and federal resources for its members to use in developing management plans and harvest prescriptions. TNCFN’s group member exhibited strong conformance with laws, rules, regulations, and guidelines.
1.1.b. Forest management plans and operations comply with state Best Management Practices (BMPs) (see Appendix for references) and other government forest management guidelines applicable to the forest, both voluntary and regulatory (see also Criterion 6.5). <i>For example:</i> <ul style="list-style-type: none"> • Compliance with state, watershed, county, and planning district regulations. 	C	TNCFN’s group member’s management plan cites the forest Site-Level Forest Management Guidelines established by the Minnesota Forest Resources Council (MFRC). The group member was in overall conformance with BMPs and consulted relevant Cultural and Natural Heritage Databases.
1.1.c. Forest management plans and operations meet or exceed all applicable laws and administrative requirements with respect to sharing public	C	TNCFN requires that group member consult Minnesota’s Cultural and Natural Heritage databases. The Cultural database query results in the state contacting tribes if there

information, opening records to the public, and following procedures for public participation.		are cultural resources present on group members' properties.
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	
1.2.a. Taxes on forest land and timber, as well as other fees related to forest management, are paid in a timely manner and in accordance with state and local laws. <i>For example:</i> <ul style="list-style-type: none"> • Tax receipts verify that property and excise taxes have been paid. 	C	Private landowners do not pay timber taxes. However, mills do. Group members must pay property taxes if they are required to do so. TNCFN's group member has.
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	
1.3.a. Forest management operations comply with all binding treaties or other agreements to which the U.S. is a party, including treaties with American Indian tribes. <i>For example:</i> <ul style="list-style-type: none"> • There is no evidence of non-compliance with relevant treaties and agreements. 	C	There is no evidence that TNCFN and its group member are in non-compliance with relevant treaties and agreements. P. Bundy is in contact with some Tribes (Malax Band of Chippewa). There are two applicable treaties of 1837 and 1854 in central Minnesota. State courts have been hashing out what rights these give tribal managers on public lands, mostly in fishing rights. The Esden Lake property is just north of these treaty lines. TNCFN has not conducted an analysis of applicable international agreements. REC 2009.1: TNCFN should consult with the Minnesota DNR, which has prepared a written protocol outlining the acceptance of binding international agreements including CITES.
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.	C	
1.4.a. Where conflicts between laws and FSC Principles and Criteria occur, they are referred to the appropriate FSC body.	C	There is no conflict between local, state, and federal laws and the FSC Principles and Criteria.
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. Forest owners or managers implement measures to prevent illegal and unauthorized activities in the forest. <i>For example:</i>	C	P. Bundy regularly visits his property and protects it from unauthorized activities. The auditor saw no evidence of illegal and unauthorized activities in the forest.

<ul style="list-style-type: none"> • <i>The land manager paints and posts boundary notices, uses gates, makes periodic inspections, and reports illegal activities to the proper authorities.</i> 		
<p>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p> <p><i>Applicability note to Criterion 1.6.: Assessment of this criterion is guided by both FSC Policy and Guidelines: Partial Certification for Large Ownerships (FSC POL 20-001 Partial Certification and the FSC Guidelines for Certification Bodies FSC-STD-20-001 (version 2-1)) both available at http://www.fsc.org/en/whats_new/documents/Docs_cent/2.</i></p>	C	
<p>1.6.a. Forest owners or managers provide written statements of commitment to the FSC Principles and Criteria. The commitment is stated in the management plan [see 7.1], a document prepared for the certification process, or another official document.</p>	C	TNCFN includes a statement of commitment to the FSC P&C in its Forest Manage Plan. By signing the consent form with TNCFN, group members agree to adhere to the FSC P&C.
<p>1.6.b Forest owners or managers document the reasons for seeking partial certification.</p>	C	The Bundy property has a powerline right of way and home site that are cited in the Bundy Management Plan.
<p>1.6.c Forest owners or managers document strategies and silvicultural treatments for several harvest entries that meet the FSC Principles and Criteria (see Principle 7).</p>	C	The Bundy Management Plan documents silvicultural strategies in prescription documents.
<p>P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p> <p><i>Applicability Note: Property rights of private landowners are respected. The forest owner or manager of privately owned land retain their private property rights, while simultaneously honoring the rights of adjacent landowners.</i></p>		
<p>2.1.a. Forest owners or managers document the legal and customary rights associated with the forest. These rights include both those held by the party seeking certification and those held by other parties.</p>	C	P. Bundy has retained easement on a neighboring property that he used to own to have access to his remaining portion.

<p>2.1.b. Affected land boundaries are clearly identified on the ground by the forest owner or manager prior to commencement of management activities.</p>	<p>C</p>	<p>The Bundy property has clearly identifiable boundaries.</p>
<p>C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</p> <p><i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i></p>	<p>C</p>	
<p>2.2.a. The forest owner or manager allows legal and customary rights to the extent that they are consistent with the conservation of the forest resource and the objectives stated in the management plan.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Hiking, hunting, and fishing on non-posted property.</i> • <i>Visiting ancestral gravesites.</i> 	<p>C</p>	<p>P. Bundy allows some neighbors to hunt deer on the property. Deer herd management is consistent with the objectives of achieving regeneration of many commercial tree species.</p>
<p>2.2.b. On ownerships where customary use rights or traditional and cultural areas/sites exist, forest owners or managers consult with concerned groups in the planning and implementation of forest management activities.</p>	<p>C</p>	<p>P. Bundy maintains regular contact with his neighbors regarding customary uses.</p>
<p>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	<p>C</p>	
<p>2.3.a. The forest owner or manager maintains relations with community stakeholders to identify disputes while still in their early stages. If disputes arise, the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If negotiation fails, existing local, state, Federal, and tribal laws are employed to resolve claims of land tenure (see Glossary).</p>	<p>C</p>	<p>P. Bundy has used informal and formal mechanisms to resolve disputes over boundaries in the past on his property. He has been able to resolve some past issues with neighbors through ongoing dialogue and cooperation on responding to local zoning changes.</p>

2.3.b. The forest owner or manager provides information to the certification body regarding unresolved and/or ongoing disputes over tenure and use-rights.	C	No known disputes, unresolved or ongoing, were uncovered during the audit.
<p>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p> <p><i>Applicability Note: Under Principle 3, the terms "tribes," "tribal," or "American Indian groups" include all indigenous peoples in the U.S., groups or individuals, who may be organized in recognized or unrecognized tribes, bands, nations, native corporations, or other native groups.</i></p>		
C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	NA	TNCFN does not yet have any group members of American Indian tribes.
<p>3.1.a. On tribal lands, forest management and planning includes a process for input by tribal members in accordance with their laws and customs.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Forest owners or managers utilize tribal experience, knowledge, practices, and insights in forest management planning and operations on tribal lands when requested to do so by the tribal landowner.</i> 	NA	
<p>3.1.b. Forest management on tribal lands is delegated or implemented by an authorized tribal governing body.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>A tribal body that is either elected or based on hereditary appointment authorizes the forest management operations.</i> • <i>Documents verify the authority of the tribal body.</i> 	NA	
C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	C	
3.2.a. Forest owners or managers identify and contact American Indian groups that have customary use rights or other legal rights to the management area and invite their participation in the forest planning processes, appropriate to the scale and intensity of the operation. (see also Criterion 4.4.)	C	P. Bundy, through use of the Minnesota Historical Society’s Cultural Heritage database and by maintaining contact with local American Indian tribes for management consulting on other lands, has attempted to identify any customary use rights and legal rights on his property.
3.2.b. Steps are taken during the forest management planning process and implementation to protect tribal resources that may be directly affected by	C	No tribal resources were identified on P. Bundy’s property.

<p>certified operations such as adjacent lands, bodies of water, critical habitats, and riparian corridors as well as other resource uses such as rights to hunt, fish, or gather.</p>		
<p>C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</p>	C	
<p>3.3.a. Forest owners or managers make systematic efforts to identify areas of cultural, historical, and/or religious significance. They invite participation of tribal representatives (or other appropriate persons, where tribal entities are lacking) in the identification of current or traditionally significant sites within the forest proposed for certification.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Such efforts include surveying, recording, assessment, establishment, and use of special use and protected areas when and where they are mandated by treaty rights.</i> • <i>Forest owners or managers check existing heritage and cultural databases.</i> • <i>Areas of cultural, historical, and religious significance as well as areas of traditional use, are documented by authorized tribal leaders or their designated representatives.</i> <p><i>For example, areas of special significance may include:</i></p> <ul style="list-style-type: none"> • <i>Ceremonial, burial, or village sites;</i> • <i>Areas used for hunting, fishing, or trapping;</i> • <i>Current gathering areas for culturally important or ceremonial materials, such as Basket materials, medicinal plants, or plants used in dances;</i> • <i>Current gathering areas for subsistence uses, such as mushrooms, berries, acorns, etc.</i> 	C	<p>Landowners in Minnesota can consult the Minnesota Historical Society’s Cultural Heritage database. The Historical Society maintains contact with tribal representatives who know the locations of many sites of interest.</p>
<p>3.3.b. Forest owners and managers consult with tribal leaders (or other appropriate persons, where tribal entities are lacking) to develop mechanisms that ensure forest management operations protect from damage or interference those areas described in 3.3.a. and incorporate these special places into forest management and operational plans.</p>		
<p>3.3.c. Confidentiality of disclosures is maintained</p>	C	<p>The Minnesota Historical Society keeps the locations of all</p>

in keeping with applicable laws and the requirements of tribal representatives.		tribal resources confidential.
C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NA	No group members of TNCFN implement traditional knowledge of indigenous peoples in their management systems.
3.4.a. Forest owners or managers respect the confidentiality of tribal knowledge and assist in the protection of tribal intellectual property rights. <i>For example:</i> <ul style="list-style-type: none"> • <i>When traditional ecological knowledge is requested for use in forest management, protocols are jointly developed with local tribes to protect the intellectual property rights of those tribes.</i> 		
3.4.b. A written agreement is reached with individual American Indians and/or tribes prior to commercialization of their indigenous intellectual property, traditional knowledge, and/or forest resources. The individuals and/or tribes are compensated when such commercialization takes place.		
P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	C	
4.1.a. Opportunities for employment, contracting, procurement, processing, and training are as good for non-local service providers as they are for local service providers doing similar work. <i>For example:</i> <ul style="list-style-type: none"> • <i>Forest owners or managers give local goods and service providers an equal opportunity to bid on all contracts and services.</i> • <i>Timber sales are offered in quantities and intervals that allow participation by local companies of all sizes.</i> • <i>Forest owners or managers utilize qualified local employees and contractors.</i> 	C	P. Bundy employs local contractors for land management activities. Currently, P. Bundy conducts his own management activities (brush cutting, pruning, etc.) as timber markets are very low.
4.1.b. Forest work is packaged and offered in ways	C	P. Bundy has worked long-term with several local

<p>that create quality work opportunities for employees, contractors, and their workers.</p> <p><i>For example, quality work can include, the following attributes:</i></p> <ul style="list-style-type: none"> • <i>Employee and contractor relationships that are long term and stable;</i> • <i>A mixture of diverse tasks that require varying skill levels;</i> • <i>Opportunities for employees to advance;</i> • <i>A comprehensive package of benefits;</i> • <i>Opportunities for employee and contractor participation in decision-making;</i> • <i>Employment conditions (e.g., remuneration, benefits, safety equipment, training, and workman’s compensation) are as good for non-local workers as they are for local workers doing the same job;</i> • <i>Forest owners or managers provide and/or support training opportunities for workers to improve their skills.</i> 		<p>contractors for harvesting, planting, brush cutting and other tasks.</p>
<p>4.1.c. Forest owners or managers contribute to public education about forestry practices.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The forest is offered as a training and/or educational resource for local people in conjunction with schools, community colleges, and/or other providers of training and education.</i> 	C	<p>P. Bundy offers workshops on land use history and forestry on his property. He has also published two books related to his experiences as a land manager.</p>
<p>4.1.d. Forest owners or managers participate and invest in the local economy and civic activities.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Forest owners or managers participate in fundraisers, field days, and local forestry committees.</i> • <i>Facilities and equipment are regularly maintained and updated.</i> • <i>Out-of-area owners maintain a local office.</i> • <i>The forest owner or manager supports local business development by working with organizations, such as chambers of commerce.</i> 	C	<p>One of TNCFN’s objectives is to increase private landowners’ access to certification. P. Bundy has long been active in Minnesota forestry and land use issues. He maintains a regular presence on his property.</p>
<p>4.1.e. Employee compensation and hiring practices meet or exceed the prevailing local norms for work within the forest industry that requires equivalent education, skills, and experience.</p>	C	<p>P. Bundy is the only one working on his land currently. No evidence of poor hiring or contracting practices were uncovered during the audit.</p>
<p>4.1.f. Forest owners or managers assure that contractors, subcontractors, intermediaries, and</p>	C	<p>P. Bundy currently does not contract work out on his property as timber markets are down.</p>

<p>persons hired by them are covered and protected by all state and Federal labor laws regarding discrimination, wages, benefits, and other conditions of employment.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Contracts contain clauses specific to legal coverage and protection.</i> • <i>Owners and managers monitor compliance with laws.</i> • <i>Employees are not discriminated against because of gender, race, religion, age, or disability.</i> 		
<p>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	C	
<p>4.2.a. The forest owner or manager and their contractors develop and implement safety programs and procedures.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Machinery and equipment are well-maintained and safe.</i> • <i>Safety equipment appropriate to each task is used.</i> • <i>Safety procedures are documented and posted in the workplace.</i> • <i>Education in safety is offered (such as Forest Industry Safety Training Alliance and Game of Logging) .</i> • <i>Contracts include safety requirements.</i> • <i>For employees, safety records, training reports, and certificates are maintained.</i> 	C	<p>P. Bundy currently does all forest management work on his property. No evidence of unsafe practices was uncovered during the audit. Most contractors in Minnesota have gone through the Minnesota Logger Education Program.</p>
<p>C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p> <p><i>Applicability Note: This Criterion is guided by FSC guidelines on ILO Conventions (http://www.fsc.org/en/whats_new/documents/Docs_cent/2).</i></p>	C	
<p>4.3.a. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>	C	<p>P. Bundy is a member of several local and national forestry associations, including the Society of American Foresters and the Forest Guild. TNCFN places no restrictions on its members in regards to employment or landowner advocate organizations.</p>
<p>4.3.b. Forest owners or managers and their</p>	C	<p>TNCFN and its group member, P. Bundy, have no known</p>

<p>contractors develop effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p> <p><i>Examples of culturally sensitive mechanisms are:</i></p> <ul style="list-style-type: none"> • <i>Translation and cultural interpretation, when needed;</i> • <i>Cross-cultural training, when needed, to integrate the workforce.</i> 		<p>disputes with their employees and contractors.</p>
<p>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.</p> <p><i>Applicability Note: People and groups directly affected by management operations may include: employees and contractors of the landowner, neighbors, fishers, hunters and gatherers, recreationalists, water users, and forest products processors.</i></p>	C	
<p>4.4.a. On lands with multiple owners, a process is provided that assures the opportunity for fair and reasonable input from the landowners and/or shareholders.</p>	NA	<p>P. Bundy is the sole owner of his property.</p>
<p>4.4.b. Input is sought in identifying significant sites of archeological, cultural, historical, or community importance, that are to be designated as special management zones or otherwise protected during operations.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>State archeological offices, universities, and local experts have been consulted to identify known areas and develop protection plans.</i> 	C	<p>TNCFN requires that its members consult Natural and Cultural Heritage Databases in Minnesota for inclusion of information in management plans and in preparation of management operations. P. Bundy has made such consultations.</p>
<p>4.4.c. Viewpoints and feedback are solicited from people and groups directly affected by forest management operations and its associated environmental and aesthetic effects (e.g., logging, burning, spraying, and traffic). Significant concerns are addressed in management policies and plans.</p>	C/ NC	<p>P. Bundy maintains regular contact with his neighbors in regards to any management operations affecting them.</p> <p>CAR 2009.1: TNCFN shall identify the most relevant socioeconomic issues to cover in its first-level review of potential group members. TNCFN shall include a level of review and monitoring for the creation or maintenance of local jobs of its group members and maintain a record of public responses to its group members' management activities as part of its social assessment. TNCFN may also identify other important socioeconomic factors as it deems fit to include in monitoring.</p>
<p>4.4.d. Forest owners or managers of large and mid-</p>	NA	<p>TNCFN is a group program and does not contain large and</p>

<p>sized (see Glossary) forests provide opportunities for people directly affected by management operations to provide input into management planning.</p>		<p>mid-sized forests holdings.</p>
<p>4.4.e. For public forests, consultation will include the following components:</p> <p><i>Note: ‘The public’ includes people and groups directly affected by management operations and all citizens of the relevant jurisdiction.</i></p> <p><i>Applicability Note: For the purposes of indicator 4.4.e each numbered component should be scored separately.</i></p>	<p>NA</p>	<p>TNCFN’s program does not currently have public forests.</p>
<p>1. Legislative and historical mandates are included in the plan, and provisions are made for their accomplishment.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Legal mandates are carried out.</i> 	<p>NA</p>	<p>TNCFN’s program does not currently have public forests.</p>
<p>2. Clearly defined and accessible methods for public participation are provided in both the strategic (long-range) and tactical (short-range) planning processes, including initial adoption and subsequent amendments.</p> <p><i>Applicability Note: Strategic plans may be very general. Tactical plans are specific and describe candidate stands for proposed silvicultural activities.</i></p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Administrative rules or other documentation are provided for public input.</i> • <i>Some routine activities with little or no environmental impact that appear unlikely to solicit input may be exempted from the procedures of public notification and comment. Examples of such activities include, but are not limited to:</i> <ol style="list-style-type: none"> 1. <i>Maintaining existing buildings or structures</i> 2. <i>Maintaining existing permanent roads or trails</i> 3. <i>Maintaining existing open-land areas (e.g., mowing grass)</i> 4. <i>Minor changes to tactical plans (e.g., small changes to areas affected)</i> • <i>Public agencies solicit public input as early as practicable into the process.</i> 	<p>NA</p>	<p>TNCFN’s program does not currently have public forests.</p>

<p>3. Public notification is sufficient to allow interested citizens of the affected jurisdiction and/or other people and groups directly affected by management operations the chance to learn of upcoming opportunities for public review and/or comment on the proposed management.</p>	NA	TNCFN's program does not currently have public forests.
<p>4. The final planning decisions are based on legal mandate, public input, credible scientific analysis, and the productive capacity of the land and are made by professional employees, hired by the public, or other legally authorized parties.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Evidence of how public comments are considered is provided.</i> 	NA	TNCFN's program does not currently have public forests.
<p>5. An accessible and affordable appeals process to planning decisions is available.</p> <p><i>Note: FSC certification does not preclude any individual or group from seeking legislative or judicial relief.</i></p>	NA	TNCFN's program does not currently have public forests.
<p>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p> <p><i>Applicability Note: Provisions of Criterion 4.5. do not evoke protections or liabilities beyond those provided by Federal, state, and local laws.</i></p>	C	
<p>4.5.a. The forest owner or manager attempts to resolve grievances and mitigate damage resulting from forest management activities through open communication and negotiation prior to legal action.</p>	C	P. Bundy recently resolved a grievance against a developer that involved several rounds of communication before he pursued legal action in courts.
<p>4.5.b. Forest owners or managers and their contractors have adequate liability insurance.</p>	C	P. Bundy requires that contractors have proof of liability insurance prior to negotiating contracts.
<p>P5 Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p>		
<p>C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments</p>	C	

necessary to maintain the ecological productivity of the forest.		
5.1.a. The forest owner or manager is willing and able to support long-term forest management (i.e., decades rather than quarter-years or years), such as planning, inventory, resource protection, and post-harvest management activities.	C	TNCFN's group member has owned and managed the property since 1973. Since he is a land manager by trade, he has kept regular inventories and conducts a series of post-harvest management activities, such as supplemental plantings and brush cutting.
5.1.b. Responses (such as increases in harvests or debt load) to short-term financial factors (such as market fluctuations and sawmill supply requirements) are limited to levels that enable fulfillment of the management plan.	C	P. Bundy is able to respond to short-term fluctuations in timber markets through diverse sources of income and also can fulfill the management plan due to the many options that it includes.
5.1.c. Investment and/or reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity. <i>For example:</i> <ul style="list-style-type: none"> • <i>Investments have been made in forest stand improvement activities and information systems.</i> • <i>Forest conditions confirm that investments are adequate.</i> 	C	P. Bundy carries out stand improvement activities, such as thinning, brush cuttings and supplemental plantings. The site has a history of highgrading that he is trying to overcome through various management activities.
C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	C	
5.2.a. Opportunities are given to local, financially competitive, value-added processing and manufacturing facilities. <i>For example:</i> <ul style="list-style-type: none"> • <i>The technical and financial specifications of some sales of forest products are scaled to allow successful competition by small businesses.</i> 	C	In addition to FSC forest management certification, TNCFN has already achieved FSC Chain-of-Custody group certification for a number of types of processing facilities locally. It is hoped that FM and CoC group members will be able to work in a mutually beneficial manner. The Bundy property is small, so it is ideal for smaller operators.
5.2.b. When non-timber products are harvested, the management and use of those products is incorporated into the management plan.	C	P. Bundy does not manage NTFPs. Future TNCFN group members will have to address this indicator.
5.2.c. New markets are explored for products from common but underutilized forest species.	C	P. Bundy has used many of the species from his property, such as maple, oak and pine, in the two structures on the home site.
C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	C	
5.3.a. Adequate quantities and a diversity of size	C	The auditor observed adequate woody debris in production

<p>classes of woody debris (considered a reinvestment of biological capital under this criterion—not an economic waste) are left on the forest floor to maintain ecosystem functions, wildlife habitats, and future forest productivity.</p>		<p>and reserve areas on the Bundy property. There has not been an active harvest on the property for many years, so principal activities of wood removal have been firewood collection.</p>
<p>5.3.b. The loss and/or waste of merchantable forest products is minimized.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Harvested products are handled to minimize potential loss in value.</i> • <i>Waste from on-site processing facilities (e.g., portable sawmills) is minimized and used as an input into a productive process.</i> 	C	<p>The auditor observed an old harvest site. It was clear from remnant stumps and tops that waste was minimized.</p>
<p>5.3.c. Harvest practices minimize residual stand damage.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Soil compaction, rutting, and erosion are minimized.</i> • <i>Provisions that define acceptable levels of residual damage are included in operational contracts.</i> • <i>Low-impact logging techniques are used.</i> • <i>Non-timber forest products are protected from damage by management activities.</i> • <i>Bumper trees are utilized and equipment is selected and used in a way that minimizes unintentional damage to residual trees.</i> 	C	<p>The auditor observed minimal stand damage. Since there had not been a harvest in many years, it is likely that any damaged trees had already healed or had become snags. There have also been windstorms on the property that have led to a pulse of woody debris in some areas. Vegetative cover on old harvest sites was thick and there were no visible signs of erosion.</p>
<p>C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	C	
<p>5.4.a. Forest management diversifies forest uses and products, while maintaining forest composition, structures, and functions.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Compatible uses may include recreation, ecotourism, hunting, fishing, and specialty products.</i> 	C	<p>P. Bundy, through using oak, maple and other wood from his forest in the construction of his home site, has been able to use some hardwoods that would have otherwise been used as firewood as there are few markets for them in Minnesota. P. Bundy manages for forest composition, wildlife, and the health of the lake and wetlands.</p>
<p>C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p> <p><i>The Working Group considers that this criterion is sufficiently explicit and measurable, so does not</i></p>	C	<p>P. Bundy protects wetland areas and the lake on the property. There is a vegetative buffer around the lake in which he does not engage in harvesting. He has worked with MN DNR on enhancing some of the fish populations in the lake.</p>

<i>require indicators.</i>		
C5.6. The rate of harvest of forest products shall not exceed levels that can be permanently sustained.	C	
<p>5.6.a. The sustainability of harvest levels is based on growth and regeneration data, site index models, soil classification, and/or desired future conditions. The required level of documentation is determined by the scale and intensity of the operation.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Stocking rates, growth rates, and removal volumes conform to projections of the long-term written management plan.</i> • <i>The age-class distribution (see Glossary) required for a sustainable-yield volume is justified by data.</i> 	C	P. Bundy conducts a forest inventory every 5-10 years as well as measures growth on permanently established crop trees every two years. He uses this data to project growth in to the future and determine where, how much, and how to conduct a harvest prescription. He uses site index models for stands and uses soil data to assess productivity. He has an average diameter class distribution for the stands.
<p>5.6.b. After the species composition and the age-class (see Glossary) distribution commensurate with long-term sustainability have been achieved, harvest and growth records demonstrate that the volume harvested during any 10-year span is less than the net growth accumulated over that same period. Exceptions to this constraint may be granted to forest owners or managers whose periodic cycle of re-entry is longer than 10 years. In such cases, allowable harvest is determined by examining the volume of re-growth and removal since the previous harvest and the forest owner or manager's commitment to allow an equivalent amount of re-growth before additional harvests.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Rapid growth rates in younger forests are not used as the sole justification for the harvest of slower-growing, older forests.</i> 	C	P. Bundy's harvest data show that timber volumes are either increasing or remaining steady on average over time. His harvest re-entries occur every ten years or more.
<p>5.6.c. If rates of harvest are temporarily accelerated to compensate for or prevent unacceptable mortality, or in cases of salvage operations (see Indicator 6.3.c.4), the rate of future harvest is recalculated accordingly to meet desired future conditions, and the adjusted rate of harvest is implemented within three years of the temporary acceleration.</p>	C	Even after salvage operations of the early 90s, timber volumes on Esden Lake are still increasing or remaining steady for species and species classifications (e.g., mixed hardwoods) over time.
P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity		

of the forest.		
<p>C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</p> <p><i>Applicability Note: Small forest owners or managers who practice low intensity forestry may meet this requirement with brief, informal assessments. More extensive and detailed assessments (e.g., formal assessments by scientists) are expected by large forest owners or managers and/or those who practice more intensive forestry management (see Glossary).</i></p>	C	
<p>6.1.a. Using credible scientific analyses and local expertise, an assessment of current conditions is completed to include:</p> <ul style="list-style-type: none"> • Disturbance regimes and successional pathways; • Unique, vulnerable, rare, and threatened communities; • Common plants, animals, and their habitats; • Sensitive, threatened, and endangered species and their habitats; • Water resources; and • Soil resources (see also Indicators 7.1.a and b). 	C	As P. Bundy has a small property, his management plan contains a sufficient level of review of ecological conditions, successional pathways, and management limitations based on sensitive resources. His harvest prescription template is sufficient to provide operators with clear indications on unique and sensitive habitats, and water and soil resources.
<p>6.1.b. Using available science and local expertise, the current ecological conditions are compared to both the historical conditions and desired future conditions within the landscape context. This comparison is done by employing the baseline factors identified in 6.1.a.</p>	C	TNCFN requires its members to consult Minnesota's Natural and Cultural Heritage Database as part of its review of management plans. P. Bundy's management plan also includes a description of historical land use and species compositions that have led to current stand conditions.
<p>6.1.c. Prior to the commencement of management activities, potential short-term environmental impacts and their cumulative effects are evaluated.</p>	C	P. Bundy's harvest prescription template is sufficient to provide operators with clear indications on unique and sensitive habitats, and water and soil resources. The prescription document outlines the objectives of the operation in the short- and long-term. Multiple stand entries have a clear rationale and allow for adequate recovery before reentry. P. Bundy outlines several management options based on ecological functions and successional pathways in the management plan.

<p>6.1.d. Using assessments derived from the above information, management options are developed and implemented to achieve the long-term desired future conditions and ecological functions of the forest (see also Criterion 7.1).</p>	<p>C</p>	<p>See above.</p>
<p>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>	<p>C</p>	
<p>6.2.a. Although species that are state and/or Federally listed as threatened, endangered, of special concern, or sensitive, and their habitats are identified, their specific locations remain confidential.</p> <p><i>Note: On public forests and large private forests, the general locations of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species are made available to the public.</i></p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The forest owner or manager has contacted the state natural heritage program (or its equivalent) to obtain a list of listed species and their habitat or community type to document their presence or potential presence.</i> • <i>An on-the-ground survey for listed species has been conducted.</i> • <i>The locations of such species are mapped.</i> • <i>Management plans provide descriptions of activities appropriate for maintaining such species' habitat(s).</i> • <i>Management activities are compatible with endangered species recovery plans and/or habitat conservation plans.</i> • <i>Evidence of communication and/or collaboration with relevant experts is demonstrated.</i> • <i>The forest owner or manager participates in programs to protect listed species.</i> • <i>Forestry staff receives training in the identification of listed species and their habitat requirements.</i> 	<p>C</p>	<p>TNCFN requires its members to consult Minnesota's Natural and Cultural Heritage Database as part of its review of management plans. These locations remain confidential.</p>

<p>6.2.b. If scientific data indicate the likely presence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive populations, either new surveys are carried out before field-management activities begin or the forest owner or manager assumes their presence and makes appropriate modifications in forest management.</p>	C	<p>No known sites were uncovered during the consultation with the Minnesota Natural Heritage Database on P. Bundy’s property. P. Bundy protects wetlands and other water courses on the property.</p>
<p>6.2.c. For management planning purposes, forest owners or managers of publicly owned and large privately owned forests use, participate in, or carry out on-the-ground assessments for the occurrence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The forest owner or manager uses an appropriate survey for listed species.</i> 	NA	<p>TNCFN does not contain any publically owned or large privately owned forests at this time.</p>
<p>6.2.d. Where they have been identified, state and/or Federally listed as threatened, endangered, of special concern, or sensitive species and their habitats are maintained and/or restored. Multiple-use management activities are acceptable, where the law allows, in these species’ habitat areas to the extent that they are compatible with maintenance and restoration of the species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Within the context of existing landscape and ownership patterns, conservation zones for listed species and other protected areas are arranged to enhance the viability of habitats, including their connectivity.</i> 	C	<p>No known sites were uncovered during the consultation with the Minnesota Natural Heritage Database on P. Bundy’s property. P. Bundy protects wetlands and other water courses on the property.</p>
<p>6.2.e. If a state and/or Federally listed as threatened, endangered, of special concern, or sensitive species is determined to be present, its location is reported to the manager of the species’ database.</p>	C	<p>No known sites were uncovered during the consultation with the Minnesota Natural Heritage Database on P. Bundy’s property. P. Bundy protects wetlands and other water courses on the property.</p>
<p>C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	C	
<p>C6.3.a. Forest regeneration and succession</p> <p><i>Applicability Note: Indicators 6.3.a.1. through</i></p>	C	

<p>6.3.a.4. are intended to be applied sequentially.</p>		
<p>6.3.a.1. Forest owners or managers make management decisions using credible scientific information (e.g., site classification) and information on landscape patterns (e.g., land use/land cover, non-forest uses, habitat types); ecological characteristics of adjacent forested stands (e.g., age, productivity, health); species' requirements; and frequency, distribution, and intensity of natural disturbances.</p> <p><i>Applicability Note: This indicator may apply only marginally to managers of small and mid-sized forest properties because of their limited ability to coordinate their activities with other owners within the landscape or to significantly maintain and/or improve landscape-scale vegetative patterns.</i></p>	C	<p>P. Bundy uses site indexes for classification, and incorporates non-forested land and reserve areas into the management. P. Bundy incorporates landscape level analysis of adjacent landowners to make management decisions on his property. For example, the neighboring MN DNR property has had some recent oak harvests, to which his response is to allow his to grow to continue providing a local mast source.</p>
<p>6.3.a.2. Silvicultural practices encourage regeneration that moves the forest toward a desired future condition, consistent with information gathered in 6.3.a.1.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Native species suited to the site are selected for regeneration.</i> • <i>Within five years of a regeneration harvest, adequate regeneration exists to move the stand toward desired future conditions. Exceptions are noted and documented.</i> <p><i>Note: Development of a forest that is capable of natural regeneration, based on desired future conditions, is encouraged.</i></p>	C	<p>P. Bundy outlines silvicultural strategies in the management plan to promote natural regeneration and volume growth, depending on the desired outcomes. These outcomes take into account wildlife management, ecological function, and economic factors. Where inadequate regeneration exists, P. Bundy occasionally conducts understory plantings.</p>
<p>6.3.a.3. Measures are taken to ensure the retention of endemic and difficult-to-regenerate species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Deer populations are controlled to enhance successful regeneration.</i> 	C	<p>P. Bundy has been taking measures to protect Butternut (<i>Juglans cinerea</i>) through removing cankered sections and favoring healthy growing tree parts. For other nut producing species, P. Bundy and his neighbors allow deer hunting to protect regeneration from herbivory.</p>
<p>6.3.a.4. Across the forest, or the landscape in which it is located, management actions lead to a distribution of successional stages, age classes, and community types appropriate to the scale and intensity of the operation and desired future conditions.</p> <p><i>For example:</i></p>	C	<p>Through a combination of reserves, active management and ecological disturbance, P. Bundy has a variety of age classes, community types, and successional stages appropriate to the scale of the operation.</p>

<ul style="list-style-type: none"> • <i>Large forests are managed so that large, contiguous, and interconnected patches of habitat are well distributed across the landscape, in such a way as to allow dispersal of species sensitive to fragmentation.</i> • <i>Within a context of liability and public safety, large forests and public forests are managed to allow the occurrence of natural components, structures, and disturbance regimes.</i> 		
<p>6.3.a.5. When even-aged management (see Glossary) is employed, live trees and native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type (see Glossary). Exceptions may be allowed when retention at a lower level is necessary for purposes of forest restoration and/or rehabilitation or to maintain community types that exist on the site (e.g., oak-hickory, jack pine). The level of retention increases proportionally to the size of the harvest unit.</p>	C	<p>P. Bundy has reserved even-aged options in his management plan, such as shelterwood systems and small-scale clearcuts. P. Bundy implements green tree, shrub, and snag retention when consistent with objectives for regeneration. Since most harvests are small scale, adjacent properties and stands aid in reducing visual impact and providing seed sources.</p>
<p>C6.3.b. Genetic, species, and ecosystem diversity</p>	C	
<p>6.3.b.1. Forest management conserves native plant and animal communities and species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Declining trees and snags (see Glossary) are left in the forest.</i> • <i>Vertical and horizontal structural complexity is maintained.</i> • <i>Diversity of understory species is maintained.</i> • <i>Well-distributed, large woody debris is maintained.</i> • <i>Habitats and refugia for sedentary species and those with narrow or special habitat requirements are created and/or maintained.</i> • <i>Artificial regeneration uses locally adapted seed and seedlings.</i> 	C	<p>P. Bundy’s property includes many kinds of structural diversity. Snags, green trees, understory species, and downed woody debris are left for wildlife and ecological function.</p>
<p>6.3.b.2. The forest owner or manager cooperates with local, state, and Federal agencies to protect and manage native plant and animal communities and species.</p>	C	<p>P. Bundy has been in discussion with local DNR agents on stocking Esden Lake with native fishes.</p>
<p>6.3.b.3. There is a consistent scientific method for selecting trees to plant, harvest and retain in order to preserve and/or enhance broad genetic and species diversity.</p>	C	<p>P. Bundy’s rationale for species selection includes using locally sourced native species to increase biodiversity and economic options on the property. Most planted species are pine and spruce, both of which offer short- and long-term options ecologically and economically speaking.</p>

<p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Phenotypic diversity is maintained, in accordance with desired future conditions.</i> 		
<p>6.3.b.4. Forest owners or managers maximize habitat connectivity to the extent possible at the landscape level (e.g., through an ecological classification system, at the subsection or land-type association level).</p> <p><i>For example, habitat connectivity is enhanced by:</i></p> <ul style="list-style-type: none"> • <i>Creating habitat corridors and protecting riparian management zones (RMZs) (see Glossary) between habitats;</i> • <i>Changes in harvest-patch block (see Glossary) sizes, harvest patterns, and land use changes to create connectivity among existing patches of habitat;</i> • <i>Restoration plantings specifically to increase connectivity among existing patches of habitat.</i> 	C	P. Bundy protects water courses and buffers and analyzes adjacent property land use when making management decisions. He uses site indexes based on species. Conifer plantings benefit certain bird and mammal species through providing thermal cover and shade.
<p>C6.3.c. Natural cycles that affect the productivity of the forest ecosystem</p>	C	
<p>6.3.c.1. Biological legacies of the forest community are retained at the forest and stand levels, consistent with the objectives of the management plan, including but not limited to: large live and declining trees, coarse dead wood, logs, snags, den trees, and soil organic matter.</p>	C	P. Bundy implements green tree, shrub, and snag retention when consistent with objectives for regeneration. Harvest prescriptions include information on sensitive soils if present and harvest occur when the ground is frozen as to minimize soil impacts. Since most harvests are small scale, adjacent properties and stands aid in reducing visual impact and providing seed sources.
<p>6.3.c.2. Forest management practices maintain soil fertility and organic matter, especially in the A horizon, while minimizing soil erosion and compaction. If degradation of soil quality occurs, as indicated by declining fertility or forest health, forest owners or managers modify soil management techniques.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Primary management objectives shift from commercial production to restoration.</i> • <i>Site preparation is minimized.</i> • <i>Road system design and construction is upgraded.</i> • <i>The lightest practical equipment with the lowest ground pressure is used.</i> • <i>Whole-tree harvesting is discontinued, and tops are left in the forest.</i> • <i>Longer rotations and a diversity of species are used in lieu of artificial fertilization.</i> • <i>Processes of natural early succession are</i> 	C	Harvest prescriptions include information on sensitive soils if present and harvest occur when the ground is frozen as to minimize soil impacts.

<i>allowed or encouraged.</i>		
6.3.c.3. Forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools), and forested riparian areas (see also Criterion 6.5).	C	P. Bundy has identified major wetlands and other water courses on the property. These areas have options for no management or for enhancement, such as plantings. Buffers are established around all water courses. Vernal pools are identified prior to commencement of harvests.
<p>6.3.c.4. Responses (such as salvage) to catastrophic events (such as wildfire, blowdown, and epidemics) are limited by ecological constraints.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Adequate coarse woody debris is maintained.</i> • <i>Adequate den trees and snags are maintained.</i> • <i>Endemic levels of 'pest' populations are allowed before pest control actions are carried out.</i> 	C	After a huge windstorm in the 1990s, P. Bundy identified areas where salvage was and was not possible or prudent. He chose to leave some areas alone to allow the natural disturbance to take its course through ecological succession, and salvaged some areas for firewood and other uses.
<p>*C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p> <p><i>Applicability Notes:</i></p> <p><i>When forest management activities (including timber harvest) create and maintain conditions that emulate an intact, mature forest or other successional phases that may be under-represented in the landscape, the management system that created those conditions may be used to maintain them, and the area may be considered as a representative sample for the purposes of meeting this criterion.</i></p> <p><i>Ecologically viable representative samples are designated to serve one or more of three purposes: (1) to establish and/or maintain an ecological reference condition; (2) to create or maintain an under-represented ecological condition (e.g., successional phases of a forest type or natural community (see Glossary); and (3) to protect a feature that is sensitive, rare, or unique in the landscape. Areas serving the purposes of (1) and (2) may move across the landscape as under-represented conditions change, or may be fixed in area and managed to maintain the desired conditions. Areas serving the purposes of (3) are fixed in location.</i></p>	C	

For managed forest communities in the Lake States, ecologically mature or late-successional phases (not including old growth) are generally under-represented and would qualify as representative sample areas under purposes 1 and 2. Tolerant or long-lived mid-tolerant species (e.g., white pine.) typically dominate such stands. Depending on the site and forest community, characteristics may include a well-developed understory flora, relative stability of species composition, multi-layered canopies, stable or declining live timber volume, live trees in upper quartile of expected diameter growth for the site, presence of recognized late-successional indicator species (such as certain mosses, lichens or other epiphytes), and accumulation of large snags and large downed woody material. Examples of classification systems that include some of these concepts are: “Types of Old Growth Forests” as defined by Minnesota Department of Natural Resources

(http://www.dnr.state.mn.us/forests/oldgrowth/type_s.html), and, Minnesota DNR Old-Growth Forest Policy - Goals and Results, at <http://www.dnr.state.mn.us/forests/oldgrowth/policy.html>.

For representative sample areas that may move across the landscape as conditions change (purposes 1 and 2), the length of time that an area is maintained as a representative area will vary with the rarity of the ecosystem type and specific ecological value to be conserved, the uniqueness of the represented condition, the rate at which areas with similar characteristics develop.

Examples of representative samples fixed in place and serving purpose 3 include relatively exceptional features such as fens, vernal pools, areas surrounding caves, and areas of special soils containing endemic plant species.

In most cases, intact old-growth (see Glossary) will qualify as representative sample under purpose 3 due to their rarity in the Lake States Region. Unentered old-growth stands (see Glossary) are also prime candidates for designation as representative sample areas under purpose 3. In both cases, the burden is on the landowner/manager to demonstrate that these areas should NOT qualify as representative sample

<p><i>areas under purpose 3. Other very old forests (over 150 years old) that do not meet the Lake States Standard’s strict definition of “old growth” (e.g., there is some evidence of past harvesting) should also be considered as potential representative sample areas under purpose 3</i></p> <p><i>Forests of all sizes may be conducive to protection of fixed features, such as rock outcrops and bogs. Medium sized and large forests may be more conducive to the maintenance of successional phases and disturbance patterns than small forests.</i></p> <p><i>While public lands (see Glossary) are expected to bear primary responsibility for protecting representative samples of existing ecosystems, FSC certification of private lands can contribute to such protection.</i></p> <p><i>Representative samples may be protected solely by the conditions of the certificate and/or through the use of conservation easements or other instruments of long-term protection.</i></p>		
<p>6.4.a. Forest owners and managers protect and reserve ecologically viable representative areas that are appropriate to the scale and intensity of the operation.</p>	C	<p>On P. Bundy’s 181 acres, he goes above and beyond what most landowners of that size do in terms of landscape level considerations. He has chosen to reserve some areas of larger oaks in response to oak harvesting on adjacent properties. He has opted to allow the 100 year old Red pine to grow and develop old growth structural characteristics. He protects wetlands and other water courses on the property.</p>
<p>6.4.b. Where existing protected areas within the landscape are not of adequate size and configuration to serve as representative samples of commonly occurring forest types as defined above, owners or managers of mid-sized and large forests, whose properties are conducive to the establishment of such areas, designates ecologically viable areas to serve these purposes.</p> <p><i>Applicability notes to 6.4.b.: When evaluating the need for representative sample areas, the assessment should consider the relative rarity and degree of protection of similar areas at the state-wide scale, or at the biophysical region scale (as defined by state Natural Heritage programs) if Natural Heritage program or other assessments suggest that there is significant variation in community or ecosystem types between biophysical regions. Where existing protected areas adequately</i></p>	C	<p>P. Bundy protects many areas on his property that he is not necessarily required to under Minnesota law.</p>

<p><i>represent commonly occurring forest types in the landscape, these areas may suffice as the representative samples and no representative sample need be established on the forest</i></p> <p><i>The owner or manager of a small forest may not be expected to designate representative sample(s) of commonly occurring forest types, except where there is an exceptional opportunity to contribute to an under-represented protected areas system. For small forests or low-intensity managed forests, this criterion is satisfied by meeting the standards of Criteria 6.2.</i></p> <p><i>The size and configuration of the representative areas depend on the:</i></p> <ol style="list-style-type: none"> <i>(1) extent of representation of their forest types within the landscape (less protection calls for more representative samples);</i> <i>(2) ecological importance of setting aside stands and tracts to other conservation efforts (a minimum size and ecological value is needed to make representative samples useful); and</i> <i>(3) intensity of forest management within the forest and across the landscape (a less intensively managed forest or landscape calls for less area of representative samples, and a more intensively managed forest or landscape calls for more).</i> 		
<p>6.4.c. The size and arrangement and time scale of on-site representative sample areas are designated and justified using assessment methods and sources of up-to-date information described in 6.1.</p> <p><i>Note: Known protected off-ownership areas that are in proximity to the management unit may be used to meet the goal in the landscape.</i></p>	C	Old growth and stands with late successional characteristics are uncommon in the Lake States. P. Bundy's designation of a Red pine stand to develop old growth characteristics for the species is consistent with the purposes outlined in C6.4.
<p>6.4.d. Unless exceptional circumstances can be documented, known areas of intact old-growth forests are designated as representative sample areas under purpose 3. (See Applicability Note under 6.4 above) and are reviewed for designation as High Conservation Value Forests (HCVF- see also Applicability note under 6.3). Known areas of unentered stands of old-growth are carefully reviewed, screened for uniqueness, and considered as potential representative sample areas prior to undertaking any active management within them (see Applicability Note under 6.4). Old growth stands not designated as either a HCVF or a</p>	C	There is no intact old growth on the Bundy property, but he has reserved an area to develop these characteristics.

representative sample area are, at a minimum, managed to maintain their old-growth structure, composition, and ecological functions under purpose 3.		
6.4.e. The size and extent of representative samples on public lands being considered for certification is determined through a transparent planning process that not only utilizes scientifically credible analyses and expertise but is also accessible and responsive to the public.	NA	TNCFN does not have any public agencies or lands included in its group membership at this time.
6.4.f. The process and rationale used to determine the size and extent of representative samples are explicitly described in the public summary.	NC	CAR 2009.2: TNCFN shall include a description of the process and rationale used to determine the size and extent of representative samples of existing ecosystems as detailed in C6.4 in its public summary.
6.4.g. Managers of large, contiguous public forests (>50,000 acres) create and maintain representative protected areas within the forest area, sufficient in size to encompass the scale and pattern of expected natural disturbances while maintaining the full range of forest types and successional stages resulting from the natural disturbance regime.	NA	TNCFN does not have any public agencies or lands included in its group membership at this time.
C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources. <i>Note: The Lakes States-Central Hardwoods Regional Certification Standards cover a diverse landscape - from prairie to glaciated Northern lands to unglaciated forests in the South. Within this region, all States have developed best management practice guidelines specific to their ecological conditions (see Appendix A). These locally developed guidelines serve as the base requirement for implementation of this standard.</i>	C	
6.5.a. A set of forestry best management practices (BMPs), approved by the state forestry agency or otherwise appropriate jurisdiction (e.g., BIA), that address water quality and soil erosion is adhered to (see also 1.1.b). These guidelines may include provisions on riparian management zones (RMZs), skidding, access roads, site preparation, log landings, stream crossings, disturbance of sensitive sites, and wetlands.	C	P. Bundy and many other private landowners in Minnesota follow the forest Site-Level Forest Management Guidelines established by the Minnesota Forest Resources Council (MFRC).
6.5.b. At a minimum, implementation of BMPs and	C	Operations on P. Bundy's land occur when soils are frozen

<p>other resource protection measures will result in the following:</p> <ul style="list-style-type: none"> • <u>Logging and Site Preparation</u> <p>Logging operations and construction of roads and skid trails are conducted only during periods of weather when soil is least susceptible to compaction, surface erosion, or sediment transport into streams and other bodies of water.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Operations are carried out when soils are either dry enough or frozen enough to minimize disturbance and compaction.</i> • <i>Vehicular access to roads is controlled to limit soil erosion and other forest damage.</i> <p>Logging damage to regeneration and residual trees is minimized during harvest operations.</p> <p>Silvicultural techniques and logging equipment vary with slope, erosion hazard rating, and/or soil instability with the goal of minimizing soil disturbance. Areas that exhibit an extreme risk of landslide are excluded from management activities that may precipitate landslides.</p> <p><i>Note: "Extreme risk" is a legally binding term in some states.</i></p> <p>Plans for site preparation specify the following mitigations to minimize impacts to the forest resources:</p> <ol style="list-style-type: none"> (1) Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. (2) Top soil disturbance and scarification of soils is limited to the minimum necessary to achieve successful regeneration of desired species. <ul style="list-style-type: none"> • <u>Transportation System (including permanent and temporary haul roads, skid trails, and landings)</u> <p>The transportation system is designed, constructed, maintained, and/or reconstructed to minimize the extent of the road network and its potential cumulative adverse effects.</p>	<p>as to minimize disturbance and compaction. The auditor observed no damage to residual trees and soils on old harvest sites. P. Bundy has outlined various silvicultural strategies to deal with different sites factors, such as slope and proximity to water courses. Slash is used to reduce soils impacts and distributed whenever possible to facilitate decay and regeneration. There is one main access road on the Bundy property a few trails that he maintains. Skid trails are kept to a minimum. The one water crossing is a permanent road with many culverts to facilitate flow between two ponds. Occasionally these receive maintenance due to beaver damage.</p>
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For example:

- *Road density is minimized.*
- *Displacement of soil and the sedimentation of streams, as well as impacts to water quality, are minimized.*
- *Patches of habitat and migration corridors are conserved as much as possible.*
- *The integrity of riparian management zones (see Glossary) and buffers (see Glossary) surrounding other valuable ecological elements (e.g., wetlands, habitat for sensitive species, and interior old-growth forest) is conserved.*

Access to temporary and permanent roads is controlled to minimize significant adverse impacts to soil and biota while allowing legitimate access, as addressed by Principles 3 and 4 and identified in the management plan.

For example:

- *Roads without a weather resistant surface (e.g., soil, dirt, or native-surfaced roads) are used only during periods of weather when conditions are favorable to minimize road damage, surface erosion, and sediment transport.*
- *Vehicle access is restricted on roads not immediately necessary for management purposes.*

Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.

- **Stream and Water Quality Protection**

Stream crossings are located and constructed in a way that minimizes fragmentation of aquatic habitat (see Glossary) and protects water quality.

For example:

- *Crossings of riparian management zones are kept to a minimum.*
- *Stream crossings are perpendicular to the waterway.*
- *Culverts allow free passage of aquatic organisms.*

- **Visual and Aesthetic Considerations**

<p>Forest owners or managers limit and/or reduce negative impacts on visual quality caused by forest management operations.</p>		
<p>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	C	
<p>6.6.a. Forest owners and managers demonstrate compliance with FSC Policy paper: “Chemical Pesticides in Certified Forests, Interpretation of the FSC Principles and Criteria, July 2002” (available at http://www.fsc.org/en/whats_new/documents/Docs_cent/2) and comply with prohibitions and/or restrictions on World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement.</p>	C	<p>REC 2009.2: TNCFN should review and cite the 2007 version of FSC’s pesticide policy in all future correspondence and change this reference in its overarching management plan.</p> <p>P. Bundy uses no chemicals. Applicant landowners must provide TNCFN with lists of any chemicals used.</p>
<p>6.6.b. Forest owners or managers employ silvicultural systems, integrated pest management, and strategies for controlling vegetation that minimize negative environmental effects. Non-chemical techniques are preferred in the implementation of these strategies.</p> <p><i>For example, components of silvicultural systems, integrated pest management, and strategies to control vegetation may include:</i></p> <ul style="list-style-type: none"> • <i>creation and maintenance of habitat that discourages pest outbreaks</i> • <i>creation and maintenance of habitat that encourages natural predators</i> • <i>evaluation of pest populations and establishment of action thresholds</i> • <i>diversification of species composition (see Glossary) and structure</i> • <i>use of low impact mechanical methods</i> 	C	<p>P. Bundy employs a mix of silvicultural methods depending on species composition, age class and other factors that should minimize the effects of pests and pathogens.</p> <p>REC 2009.3:</p> <ol style="list-style-type: none"> 1. TNCFN should ensure that all of its members follow state and federal protocols for the ash quarantine, especially as it relates to the transport of firewood and other products. 2. TNCFN members should consult ash resource maps prepared for Minnesota to evaluate their risk of infestation. There are maps on current infestations and concentrations of rural ash resources (e.g., remote sensing data). 3. TNCFN should investigate silvicultural systems, biological and chemical control, and other strategies for controlling EAB that minimize negative environmental effects. 4. TNCFN should develop a program for

<ul style="list-style-type: none"> <i>use of prescribed fire</i> 		<ol style="list-style-type: none"> Detecting and monitoring EAB on member properties. Avoiding the introduction of EAB onto member properties. Implementing silvicultural, biological, chemical and other methods to control EAB and protecting healthy or high value ash trees. Participating in state and national efforts to document and collect genetic stock of ash. <p>5. TNCFN group members should address the potentially disruptive effects of EAB as they relate to allowable cut and include this and TNCFN's EAB Contingency Plan in the management plan.</p>
<p>6.6.c. Forest owners or managers develop written strategies for the control of pests as a component of the management plan (see Criterion 7.1).</p>	C	<p>P. Bundy outlines a strategy for dealing with Butternut canker in the management plan that he is currently implementing.</p>
<p>6.6.d. If chemicals are applied, the most environmentally safe and efficacious chemicals are used. Chemicals are narrowly targeted, and minimize effects on non-target species.</p>	NA	<p>TNCFN's only group member does not use chemicals.</p>
<p>6.6.e. Chemicals are used only where they pose no threat to supplies of domestic water, aquatic habitats, or Rare species or plant community types.</p>	NA	<p>TNCFN's only group member does not use chemicals.</p>
<p>6.6.f. If chemicals are used, a written prescription is prepared that describes the risks and benefits of their use and the precautions that workers will employ.</p>	NA	<p>TNCFN's only group member does not use chemicals.</p>
<p>6.6.g. If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	NA	<p>TNCFN's only group member does not use chemicals.</p>
<p>C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</p>	C	
<p>6.7.a. In the event of a spill of hazardous material, forest owners or managers immediately contain the material, report the spill as required by applicable regulations, and engage qualified personnel to perform the appropriate removal and remediation.</p>	C	<p>TNCFN's only group member has not had harvests for many years. Managers, logging crews and contractors in Minnesota are expected to follow procedures to contain spills of hazardous materials. Guidance for minimizing spills and protecting wetlands from spills is described in the Site-level Guidelines. Operational Order 90 and Operational Order 59 detail procedures to follow in the event of a spill of hazardous material.</p>
<p>6.7.b. Waste lubricants, anti-freeze, containers, and</p>	C	<p>Operational Order 90 and Operational Order 59 detail proper</p>

<p>related trash are stored in a leakproof container until they are transported to an approved off-site disposal site.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Management operations incorporate resource recycling and reuse programs when they are available.</i> 		<p>procedures to follow for handling and transportation.</p>
<p>6.7.c. Broken or leaking equipment and parts are repaired or removed from the forest.</p>	C	<p>As no active timber operations were going on during the audit. No old equipment was observed in the forest.</p>
<p>6.7.d. Equipment is parked away from riparian management zones, sinkholes, or supplies of ground water.</p>	C	<p>Since no active timber sales were going on at the time of the audit, this was difficult to assess. The auditor observed an old timber sale and a future timber sale, both of which were on upland sites. One of the upland sites had water on either side. P. Bundy has established buffers (e.g., no-cut zones) which should thwart any entry into these areas.</p>
<p>C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</p> <p><i>Applicability Note: Genetically improved organisms (e.g., Mendelian crossed) are not considered to be genetically modified organisms (see Glossary), and may be used. The prohibition of genetically modified organisms applies to all organisms, including trees. This Criterion is guided by FSC guidelines on GMO's (http://www.fsc.org/en/whats_new/documents/Docs_cent/2).</i></p>	NA	
<p>6.8.a. Exotic (i.e., non-indigenous), non-invasive predators or biological control agents are used only as part of a pest management strategy for the control of exotic species of plants, pathogens (see Glossary), insects, or other animals when other pest control methods are, or can reasonably be expected to prove, ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for indigenous species because, for example, exotic species can host pathogens that might diminish biodiversity in the forest.</p>	NA	<p>TNCFN's only group member does not employ biological control mechanisms at this time.</p>
<p>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid</p>	C	

adverse ecological impacts.		
6.9.a. Except on plantation sites (see also Criterion 10.4), the use of exotic tree species is permitted only in the first successional stages or other short-term stages for the purposes of restoring degraded ecosystems.	NA	TNCFN's group member does not employ the use of exotic tree species.
6.9.b. The use of exotic species (see Glossary) is contingent on peer-reviewed scientific evidence that the species in question is non-invasive and will not diminish biodiversity. If non-invasive exotic species are used, the provenance and location of use are documented, and their ecological effects are actively monitored. <i>For example:</i> <ul style="list-style-type: none"> • <i>Non-invasive exotic plants that are sown to control erosion are used only when suitable native species are not readily available.</i> 	NA	TNCFN's group member does not employ the use of exotic tree species.
6.9.c. Written documentation is maintained for the use of exotic species. <i>For example:</i> <ul style="list-style-type: none"> • <i>Species mixes, rates, locations, and times of application are all recorded.</i> 	NA	TNCFN's group member does not employ the use of exotic tree species.
6.9.d. Forest owners or managers develop and implement control measures for invasive exotic species.	C	REC 2009.3: <ol style="list-style-type: none"> 1. TNCFN should ensure that all of its members follow state and federal protocols for the ash quarantine, especially as it relates to the transport of firewood and other products. 2. TNCFN members should consult ash resource maps prepared for Minnesota to evaluate their risk of infestation. There are maps on current infestations and concentrations of rural ash resources (e.g., remote sensing data). 3. TNCFN should investigate silvicultural systems, biological and chemical control, and other strategies for controlling EAB that minimize negative environmental effects. 4. TNCFN should develop a program for <ol style="list-style-type: none"> a. Detecting and monitoring EAB on member properties. b. Avoiding the introduction of EAB onto member properties. c. Implementing silvicultural, biological, chemical and other methods to control EAB and protecting healthy or high value ash trees.

		<p>d. Participating in state and national efforts to document and collect genetic stock of ash.</p> <p>5. TNCFN group members should address the potentially disruptive effects of EAB as they relate to allowable cut and include this and TNCFN's EAB Contingency Plan in the management plan.</p>
<p>C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</p> <p>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p> <p><i>Applicability Note: Forest management activities that are part of an approved management plan, including road construction and habitat restoration (such as creation of openings in the forest for wildlife habitat and the maintenance or creation of wetlands or prairies) are not conversions for the purposes of this criterion.</i></p>	NA	No conversion has taken place on the P. Bundy property.
6.10.a. Over the life of the ownership, forest to non-forest conversions are limited to the threshold of 1% of the forest area or 100 acres, whichever is smaller, except that a parcel up to two acres in size may be converted for residential use by the forest owner or manager.	NA	
6.10.b. When private forestlands are sold, a portion of the proceeds of the sale is reinvested in additional forest lands and/or forest stewardship.	NA	
<p>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>C7.1. The management plan and supporting documents shall provide:</p> <p>a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e)</p>	C	<p>TNCFN requires potential group members to address the components of this criterion in their management plans to be eligible for membership. Section C(2) of the TrueNorth Manual covers this.</p> <p>TNCFN provides a list of sources from state and federal agencies that potential members can use as resources in developing the forest management plan. For example, the State of Minnesota's private forestry program has templates for private forest stewardship plans.</p> <p>TNCFN currently only has one group member, Mr. Peter</p>

<p>Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</p> <p>i) Description and justification of harvesting techniques and equipment to be used.</p> <p><i>Applicability Note: The management plan may consist of a variety of documents not necessarily unified into a single planning document but which represents an integrated strategy for managing the forest within the ecological, economic, and social limitations of the land. The plan includes a description and rationale for management elements appropriate to the scale, intensity, and goals of management, and may include:</i></p> <ul style="list-style-type: none"> Silvicultural systems <ul style="list-style-type: none"> Regeneration strategies Maintenance of structural and species diversity Pest control (disease, insects, invasive species, and vegetation) Soil and water conservation Methods and annual rates of harvest, by species and products Equipment and personnel needs Transportation system Fire management <ul style="list-style-type: none"> Prescribed fires Wildfires Fish and wildlife and their habitats (including non-game species) Non-timber forest products <ul style="list-style-type: none"> Methods and annual rates of harvest, by species and products Regeneration strategies Socioeconomic issues <ul style="list-style-type: none"> Public access and use Conservation of historical and cultural resources <ul style="list-style-type: none"> Protection of aesthetic values Employee and contractor policies and procedures Community relations Stakeholder notification Public comment process For public forests, legal and historic 	<p>Bundy. The Bundy Property’s management plan contains objectives, a description of the forest resource, environmental limitations in terms of landuse and wetland/lake areas, local landuse and ownership, and socio-economic conditions. Maps show ownership and landuse of adjacent lands. The inventory system, harvest prescriptions, and Site-level guidelines help to describe silvicultural, other management techniques, and equipment used as well as the rationale for the harvest rate. P. Bundy has consulted the Natural Heritage Database to conduct an assessment of rare and unique habitats and has also protected watercourses.</p>
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<p>American Indian issues Protection of legal and customary rights Procedures for integrating tribal concerns in forest management Management of sites of special significance Special management areas High Conservation Value Forests Riparian management zone Set asides of samples of representative existing ecosystems Sensitive, rare, threatened, and endangered species protection Other protected areas Landscape level analyses and strategies</p>		
<p>7.1.a. Management objectives</p>	<p>C/ NC</p>	
<p>7.1.a.1. A written management plan is prepared that includes the landowner's short-term and long-term goals and objectives (ecological, social, and economic). The objectives are specific, achievable, and measurable.</p>	<p>C/ NC</p>	<p>The Bundy Management plan contains written objectives, which are not defined in short vs. long-term. It contains ecological, economic and social objectives. Wetland protection, timber management, and recreation and trails are also included as objectives.</p> <p>CAR 2009.3: TNCFN shall ensure that the Bundy Management Plan's written objectives include short- and long-term ecological, social, and economic goals and objectives that are specific, achievable, and measurable. Considerations for different species' growth rates and economic cycles are some of the factors that can be used to define short- and long-term objectives.</p>
<p>7.1.a.2. The management plan describes desired future conditions that will meet the long-term goals and objectives and that determine the silvicultural system(s) and management activities to be used.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The management plan includes a description of forest resources to be managed, environmental limitations, the status of land use and ownership, socioeconomic conditions, and a profile of adjacent lands.</i> • <i>See 7.1.b.1, 7.1.b.2, 7.1.b.3, 7.1.b.4, 7.1.b.5, and 7.1.b.6 for additional examples</i> 	<p>C</p>	<p>The Bundy Management Plan includes a description of forest resources to be managed, environmental limitations, the status of land use and ownership, socioeconomic conditions, and a profile of adjacent lands. Most stands have a desired future condition listed. Where a stand's future conditions are not defined, the "Stewardship Recommendations" section includes a list of options for future condition based on management constraints or describes how to maintain or enhance the resource.</p>
<p>7.1.b. Description of forest resources to be managed, environmental limitations, land use and ownership status, socioeconomic conditions, and profile of adjacent lands</p>	<p>C</p>	
<p>7.1.b.1. The management plan describes the timber, fish and wildlife, harvested non-timber forest products, soils, and non-economic forest resources.</p>	<p>C</p>	<p>The Bundy Management plan describes most of these resources at a stand level. No description of fish resource or NTFP resource as they are not managed for currently.</p>

		REC 2009.4: P. Bundy should consider including a section in the management plan on Esden Lake’s fish resource and any activities that may influence it.
7.1.b.2. The management plan includes descriptions of special management areas; sensitive, rare, threatened, and endangered species and their habitats; and other ecologically sensitive features in the forest.	C	The Bundy Management Plan outlines special management zones for ponds, Esden Lake, wetlands, and stand MH1, which is a pileated woodpecker site. Some limited harvesting activities are allowed in these areas. Areas surrounding the lake are managed for lake protection and wildlife, which means minimal active management.
7.1.b.3. The management plan includes a description of past land uses and incorporates this information into the vision, goals, and objectives.	C	Historical landuse is described in the Bundy Plan. Timber production and recreation are primary objectives.
7.1.b.4. The management plan identifies the legal status of the forest and its resources (e.g., ownership, usufruct rights (see Glossary), treaty rights, easements, deed restrictions, and leasing arrangements).	C	The Bundy MP includes a description of a powerline right-of-way and what activities are permitted and not permitted in the zone.
7.1.b.5. The management plan identifies relevant cultural and socioeconomic issues (e.g., traditional and customary rights of use, access, recreational uses, and employment), conditions (e.g., composition of the workforce, stability of employment, and changes in forest ownership and tenure), and areas of special significance (e.g., ceremonial and archeological sites).	NC	The owner is the primary worker on the property. The cabin site is not included under the stewardship plan. The Bundy MP describes historical landuse and current landuse of the county surrounding Esden Lake. CAR 2009.1: TNCFN shall identify the most relevant socioeconomic issues to cover in its first-level review of potential group members. TNCFN shall include a level of review and monitoring for the creation or maintenance of local jobs of its group members and maintain a record of public responses to its group members’ management activities as part of its social assessment. TNCFN may also identify other important socioeconomic factors as it deems fit to include in monitoring.
7.1.b.6. The management plan incorporates landscape-level considerations within the ownership and among adjacent and nearby lands, including major bodies of water, critical habitats, and riparian corridors shared with adjacent ownerships.	C	The Bundy MP includes some mention and consideration of nearby ownerships. For example, The Stand O-1 section recognizing the importance of the remaining oak to wildlife in this area in light of an adjacent landowner’s recent harvest.
7.1.c. Description of silvicultural and/or other management system	C	
7.1.c.1. Silvicultural system(s) and prescriptions are based on the integration of ecological and economic characteristics (e.g., successional processes, soil characteristics, existing species composition and structures, desired future conditions, and market conditions). (see also sub-Criterion 6.3.a)	C	Silvicultural prescriptions are based on ecological and economic considerations and rely heavily on existing species compositions and successional processes.
7.1.c.2. Prescriptions are prepared prior to	C	P. Bundy prepares a written prescription prior to harvesting

<p>harvesting, site preparation, pest control, burning, and planting and are available to people who implement the prescriptions.</p>		<p>that includes any areas of concerns, utilization specifications, and any site preparation activities.</p>
<p>7.1.d. Rationale for the rate of annual harvest and species selection</p>	<p>C/ NC</p>	<p>P. Bundy regularly conducts an inventory and uses the data to make land management decisions, such as what and how much to harvest.</p> <p>CAR 2009.4: TNCFN must ensure that its members turn in copies of documentation required by the SCS Group Management Standard and TNCFN's own Forest Management Manual. These include ownership documents, timber volume information, silvicultural systems, annual harvest rates, provisions for monitoring growth and dynamics, species selection, inventorying and monitoring practices, equipment, exotic species, High Conservation Values, and Cultural sites and historical resources. Once it has these documents, TNCFN must conduct its review and determine what follow up actions, if any, are required to ensure that group members are adequately prepared to participate in its program.</p>
<p>7.1.d.1. Calculations for the harvests of both timber and non-timber products are detailed or referenced in the management plan and are based on net growth, yield, stocking, and regeneration data. (see also 5.6.b)</p>	<p>C</p>	<p>P. Bundy's forest inventory system is based on net growth, yield, stocking, and regeneration data. The data for Esden lake shows that the average diameter of oak stands, for example, has been increasing over the years.</p>
<p>7.1.d.2. Species selection meets the social and economic goals and objectives of the forest owner or manager and leads to the desired future conditions while maintaining or improving the ecological composition, structures, and functions of the forest.</p>	<p>C</p>	<p>The Bundy MP employs a combination of all-aged and even-aged strategies to grow and regenerate desirable commercial species as well as protect and enhance the ecological integrity of the forest. For example, Butternut has been identified as a species of concern and is protected from harvesting.</p>
<p>7.1.d.3. The management plan addresses potentially disruptive effects of pests, storms, droughts, and fires as they relate to allowable cut.</p>	<p>C</p>	<p>The Bundy MP addresses windthrow and the past response to it, but does not discuss other disruptive effects and the management's response to them.</p> <p>REC 2009.3:</p> <ol style="list-style-type: none"> 1. TNCFN should ensure that all of its members follow state and federal protocols for the ash quarantine, especially as it relates to the transport of firewood and other products. 2. TNCFN members should consult ash resource maps prepared for Minnesota to evaluate their risk of infestation. There are maps on current infestations and concentrations of rural ash resources (e.g., remote sensing data). 3. TNCFN should investigate silvicultural systems, biological and chemical control, and other strategies for controlling EAB that minimize negative

		<p>environmental effects.</p> <ol style="list-style-type: none"> 4. TNCFN should develop a program for <ol style="list-style-type: none"> a. Detecting and monitoring EAB on member properties. b. Avoiding the introduction of EAB onto member properties. c. Implementing silvicultural, biological, chemical and other methods to control EAB and protecting healthy or high value ash trees. d. Participating in state and national efforts to document and collect genetic stock of ash. 5. TNCFN group members should address the potentially disruptive effects of EAB as they relate to allowable cut and include this and TNCFN's EAB Contingency Plan in the management plan.
7.1.e. Provisions for monitoring forest growth and dynamics.	C/ NC	CAR 2009.4: TNCFN must ensure that its members turn in copies of documentation required by the SCS Group Management Standard and TNCFN's own Forest Management Manual. These include ownership documents, timber volume information, silvicultural systems, annual harvest rates, provisions for monitoring growth and dynamics, species selection, inventorying and monitoring practices, equipment, exotic species, High Conservation Values, and Cultural sites and historical resources. Once it has these documents, TNCFN must conduct its review and determine what follow up actions, if any, are required to ensure that group members are adequately prepared to participate in its program.
7.1.e.1. The management plan includes a description of procedures to monitor the forest.	C	P. Bundy's inventory checks for seedlings, growth, downed woody debris, and overstory attributes. P. Bundy conducts several other kinds of informal monitoring, such as property boundary review and property walks.
7.1.f. Environmental safeguards based on environmental assessments (see also Criterion 6.1).	C	P. Bundy's harvest prescriptions contain references to any sensitive sites or species if they are present in a stand.
7.1.g. Plans for the identification and protection of rare, threatened, and endangered species. (see also Criterion 6.3)	C	The Bundy MP, as well as future TNCFN members, relies on consulting the MN Natural Heritage Database for identifying areas of interest for protected species, habitats, and plant communities.
7.1.h. Maps describing the forest resource base including protected areas, planned management activities, and land ownership.	C	
7.1.h.1. The management plan includes maps of such forest characteristics as: relevant landscape-level factors; property boundaries; roads; areas of timber production; forest types by age class; topography; soils; riparian zones; springs and wetlands; archaeological sites; areas of cultural and customary use; locations of sensitive, rare,	C	<p>The Bundy Map includes a map of the stands, property boundaries, roads, trails, and rights of way. Forest types are by species composition, landuse, upland or bottomland. Water bodies are identified.</p> <p>Bundy has topographical, soil, native plant community maps readily accessible.</p>

threatened, and/or endangered species and their habitats; and designated High Conservation Value Forests.		
7.1.i. Description and justification of harvesting techniques and equipment to be used. (see also Criterion 6.5)	C	
7.1.i.1. Harvesting machinery and techniques are discussed in the management or harvest plan and are specifically matched to forest conditions in order to minimize damage.	C	The descriptions of equipment and techniques are included in the harvest prescription documents.
7.1.i.2. Conditions for each timber sale are established by a timber sale contract or written harvest prescription and accompanying timber sale map. <i>For example:</i> <ul style="list-style-type: none"> • <i>Timber sale contracts and harvest prescriptions provide detailed specifications of how trees are to be harvested.</i> 	C	P. Bundy prepares written harvest prescriptions that detail the conditions for each timber sale. P. Bundy has maps that he provides to operators.
C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	C	
7.2.a. Operational components of the management plan are reviewed and revised as necessary or at least every 5 years. Components of the long-term (strategic) management plan are revised and updated at the end of the planning period or when other changes in the management require it. (see also Criterion 8.4) <i>For example:</i> <ul style="list-style-type: none"> • <i>The rationale for changes in the management plan is stated in subsequent revisions.</i> • <i>Relevant provisions of the management plan are modified in response to such changes as fire, market conditions, or damage to the road system.</i> 	C	Bundy Plan is revised regularly, the last time in February of 2009. The forest inventory is the main monitoring component. There is more informal monitoring for wildlife and lakes. However, the MN DNR's local monitoring of deer herds and some other wildlife can also be used.
C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
7.3.a. The forest owner or manager assures that workers are qualified to implement the management plan (see also Criterion 4.2). <i>For example:</i> <ul style="list-style-type: none"> • <i>Loggers and other operators participate in</i> 	C	P. Bundy is the main worker on his property. He uses licensed timber operators and reviews the harvest prescription plans with the contractor prior to the commencement of activities in order to provide any clarifications.

<p><i>informal and formal training, such as Forest Industry Safety Training Alliance, Game of Logging.</i></p> <ul style="list-style-type: none"> • <i>Professional foresters and resource managers meet continuing education standards, such as the Society of American Foresters “Certified Forester” program.</i> • <i>The forest owner or manager utilizes directories that either list or are based on worker qualifications.</i> <p>7.3.b. The management plan is understandable, comprehensive, and readily available to field personnel.</p>		
<p>C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</p> <p><i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 8.5)</i></p>	C	
<p>7.4.a. A management plan summary that outlines management objectives (from sub-Criterion 7.1.a.), whether on private lands or the land pool under a resource manager, is available to the public at a reasonable fee. Additional elements of the plan may be excluded, to protect the security of environmentally sensitive and/or proprietary information.</p>	C	The MN DNR has copies of the Bundy MP, so it is on the public record. Sometimes contractors wish to see the MP, which P. Bundy provides.
<p>7.4.b. Managers of public forests make forestry-related information easily accessible (e.g., available on websites) for public review, including that required by Criterion 7.1.</p>	NA	TNCFN does not currently have any group members that include public lands.
<p>P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p>C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the</p>	C/ NC	<p>CAR 2009.4: TNCFN must ensure that its members turn in copies of documentation required by the SCS Group Management Standard and TNCFN’s own Forest</p>

<p>relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p>		<p>Management Manual. These include ownership documents, timber volume information, silvicultural systems, annual harvest rates, provisions for monitoring growth and dynamics, species selection, inventorying and monitoring practices, equipment, exotic species, High Conservation Values, and Cultural sites and historical resources. Once it has these documents, TNCFN must conduct its review and determine what follow up actions, if any, are required to ensure that group members are adequately prepared to participate in its program.</p>
<p>8.1.a. The frequency of monitoring activities follows the schedule outlined in the management plan.</p>	<p>C/ NC</p>	<p>Based on data, P. Bundy appears to conduct inventory every two years. However, a comprehensive monitoring schedule is not described in the management plan.</p> <p>CAR 2009.5: The P. Bundy management shall include a schedule of all monitoring activities for inclusion in the management plan.</p>
<p>8.1.b. Monitoring is carried out to assess:</p> <ul style="list-style-type: none"> • The degree to which management goals and objectives have been achieved; • Deviations from the management plan; • Unexpected effects of management activities; • Social (see Criterion 4.4) and environmental (see Criterion 6.1) effects of management activities. 	<p>C</p>	
<p>8.1.c. Public and large, private land owners or managers take the lead in identifying, initiating, and supporting research efforts to address pertinent ecological questions. Small and medium private landowners or managers use information that has been developed by researchers and other managers.</p>	<p>NA</p>	<p>TNCFN does not have any public agencies or lands included in its group membership at this time.</p>
<p>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</p>	<p>C</p>	
<p>8.2.a. Yield of all forest products harvested.</p>	<p>C</p>	
<p>8.2.a.1. The forest owner or manager maintains records of standing inventories of timber and harvest volumes of timber and non-timber species (quality and quantity).</p> <p><i>For example:</i></p>	<p>C</p>	<p>P. Bundy maintains harvest records and stand inventories for all timber species in cords and MBF. He has documented salvage operations in response to windthrow.</p>

<ul style="list-style-type: none"> • Significant unanticipated removal of forest products (e.g., theft and poaching) is monitored and recorded. 		
8.2.b. Growth rates, regeneration, and condition of the forest	C	
<p>8.2.b.1. An inventory system is established and records are maintained for:</p> <ol style="list-style-type: none"> 1. Timber growth and mortality (for volume control systems); 2. Stocking, and regeneration; 3. Stand-level and forest-level composition and structure (e.g., by use of tools, such as ecological classification systems); 4. Abundance, regeneration, and habitat conditions of non-timber forest products; 5. Terrestrial and aquatic features; 6. Soil characteristics (e.g., texture, drainage, existing erosion); 7. Pest conditions. 	C	<p>P. Bundy’s inventory system covers timber growth and mortality (e.g., inclusion of snags), stocking, regeneration, and site indexes.</p> <p>Terrestrial and aquatic features, soils, and pest conditions are monitored informally and often through notices of the MN DNR. For example, the MN DNR monitors for certain pests, such as gypsy moth.</p> <p>REC 2009.3:</p> <ol style="list-style-type: none"> 1. TNCFN should ensure that all of its members follow state and federal protocols for the ash quarantine, especially as it relates to the transport of firewood and other products. 2. TNCFN members should consult ash resource maps prepared for Minnesota to evaluate their risk of infestation. There are maps on current infestations and concentrations of rural ash resources (e.g., remote sensing data). 3. TNCFN should investigate silvicultural systems, biological and chemical control, and other strategies for controlling EAB that minimize negative environmental effects. 4. TNCFN should develop a program for <ol style="list-style-type: none"> a. Detecting and monitoring EAB on member properties. b. Avoiding the introduction of EAB onto member properties. c. Implementing silvicultural, biological, chemical and other methods to control EAB and protecting healthy or high value ash trees. d. Participating in state and national efforts to document and collect genetic stock of ash. 5. TNCFN group members should address the potentially disruptive effects of EAB as they relate to allowable cut and include this and TNCFN’s EAB Contingency Plan in the management plan.
8.2.c. Composition and observed changes in the flora and fauna	C	
<p>8.2.c.1. Forest owners or managers periodically monitor the forest for changes in major habitat elements and in the occurrence of sensitive, rare, threatened, or endangered species or communities.</p>	C	<p>P. Bundy has noted the presence of pileated woodpecker in an area on which he is allowing the site to follow natural successional pathways following a wind storm. He has not conducted harvesting in this site recently, but has reserved it</p>

		as an option in the future.
8.2.d. Environmental and social impacts of harvesting and other operations	C/ NC	
8.2.d.1. The environmental effects of site-disturbing activities are assessed (e.g., road construction and repair, harvesting, and site preparation). <i>For example:</i> <ul style="list-style-type: none"> • <i>Monitoring for compliance with Best Management Practices is carried out.</i> • <i>A monitoring program is in place to assess the condition and environmental impact of the road system and landings.</i> 	C	P. Bundy conducts pre- and post-harvesting monitoring to assess BMPs and regularly evaluates the main driveway and its culverts. P. Bundy has educational events on property and goes over social history of site and
8.2.d.2. Creation or maintenance of local jobs and public responses to management activities are monitored.	C	CAR 2009.1: TNCFN shall identify the most relevant socioeconomic issues to cover in its first-level review of potential group members. TNCFN shall include a level of review and monitoring for the creation or maintenance of local jobs of its group members and maintain a record of public responses to its group members' management activities as part of its social assessment. TNCFN may also identify other important socioeconomic factors as it deems fit to include in monitoring.
8.2.d.3. Sites of special significance to American Indians are monitored in consultation with tribal representatives (see also Principle 3).	NA	No know cultural sites have been identified on TNCFN group member properties.
8.2.e. Cost, productivity, and efficiency of forest management	C	
8.2.e.1. Forest owners or managers monitor the cost and revenues of management in order to assess productivity and efficiency.	C	P. Bundy maintains cost and revenue records of his timber sales. As part of its program, TNCFN monitors group members' timber sales and group members' payments to TNCFN.
C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody." <i>Applicability Note: For chain-of-custody management requirements, see Section 3.6 of Chain of Custody Standards, FSC Accreditation Manual.</i>	C	TNCFN encourages its group member to include its FSC certification code in it all timber sale prospectuses. TNCFN also manages a group Chain-of-Custody (CoC) certificate and is well aware of CoC rules.
C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.	C	
8.4.a. Discrepancies between the results of management activities or natural events (i.e. yields, growth, ecological changes) and expectations (i.e. plans, forecasts, anticipated impacts) are appraised	C	P. Bundy uses his forest inventory data to make changes to the management plan. For example, the wind storm in the 90s was an unexpected event and he had to alter his management activities for the affect stands.

and taken into account in the subsequent management plan.		
C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2. <i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 7.4)</i>	NC	
8.5.a. A summary outlining the results of monitoring is available to the public at a reasonable fee, whether on private lands or a land pool under a resource manager or group certification.	NC	PRE 2009.1: TNCFN shall develop a template for the creation of a public summary of the results of monitoring indicators, including those listed in C8.2. TNCFN must also provide a timeline of monitoring activities to take place and how regularly the public monitoring summary will be updated.
8.5.b. Managers of public forests make information related to monitoring easily accessible (e.g., available on websites) for public review.	NA	TNCFN does not have any public agencies or lands included in its group membership at this time.
<p>P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ul style="list-style-type: none"> a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). <p>Examples of forest areas that <i>may have</i> high conservation value attributes include, but are not limited to:</p> <p>Central Hardwoods:</p> <ul style="list-style-type: none"> • Old growth – (see Glossary) (a) • Old forests/mixed age stands that include trees >160 years old (a) • Municipal watersheds –headwaters, reservoirs (c) • Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b) • Intact forest blocks in an agriculturally dominated landscape (refugia) (a) 		

- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens (c)
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund’s Forest Communities of Highest Conservation Concern (b)

Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.

In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.

Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.

Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.

Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.

<p>C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p> <p><i>Applicability Note: Certain information may be withheld from public discussion to protect the attributes that may be of High Conservation Value. The level of delineation and consultations required is dependent on the scale and intensity of the operation.</i></p>	<p>C</p>	<p>TNCFN relies on its members’ consultation of the MN DNR’s Minnesota Natural Heritage Info System and Minnesota County Biological Survey to detect the presence of rare, endangered, and unique ecosystems and habitats in their districts. TNCFN expects its member to use these as a first level of review for the potential presence of HCVFs.</p>
<p>9.1.a. Attributes and locations of High Conservation Value Forests are determined by: (1) Globally rare, threatened, or endangered features, habitats, or ecosystems that may be present in the forest (suggested sources of</p>	<p>C</p>	<p>TNCFN relies on its members’ consultation of the MN DNR’s Minnesota Natural Heritage Info System and Minnesota County Biological Survey to detect the presence of rare, endangered, and unique ecosystems and habitats in their districts. TNCFN expects its member to use these as a</p>

<p>information are: The Nature Conservancy, World Wildlife Fund, Conservation International, World Resources Institute);</p> <p>(2) Regionally and locally rare, threatened, or endangered features, habitats, or ecosystems that may be present in the forest; culturally and tribally significant areas; or municipal watersheds that may be present in the landscape and/or certified forest (suggested sources of information include natural and cultural heritage agencies);</p> <p>(3) Appropriate consultations with local and regional scientists and other stakeholders;</p> <p>(4) Public review of proposed HCVF attributes and areas on large-scale and public ownerships (see also 7.4, 4.4.e., 4.4.f.);</p> <p>(5) Integration of information from consultations and public review into proposed HCVF delineation;</p> <p>(6) Delineation by maps and habitat descriptions.</p>		<p>first level of review for the potential presence of HCVFs, which is commendable. Its current first-level HCVF process does not include an assessment for forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) or Old Growth.</p> <p>REC 2009.5: In addition to the MN DNR’s Minnesota Natural Heritage Info System and Minnesota County Biological Survey that TNCFN requires its members to consult, TNCFN’s HCVF review should include a level (or levels) of review for determining Old Growth HCVFs and for forest areas that provide basic services in critical situations. TNCFN should consider developing a level of review for forest areas fundamental to meeting basic needs of local communities in anticipation of potential group members, such as forestlands on American Indian, church or boy/ girl scout properties.</p>
<p>C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes and options for the maintenance thereof.</p>	<p>C</p>	<p>For small private landowners, consultation with the MN Natural Heritage Database, Minnesota County Biological Survey, and MN DNR Old Growth Policies should be sufficient for consultative portion as MN DNR is FSC certified, which provides another vehicle for public comment into tools developed by the MN DNR.</p> <p>Once TNCFN includes group members that are large in size or publically managed, there may need to be a more substantial consultative portion.</p>
<p>C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p> <p><i>Applicability Note: The applicability of the precautionary principle (see Glossary) and the consequent flexibility of forest management vary with the size, configuration, and tenure of the HCVF:</i></p> <p>a) <i>More flexibility is appropriate where an HCV forest is less intact, larger in area, has a larger area-to-perimeter ratio, and its tenure is assured over the long term.</i></p> <p>b) <i>Less flexibility is appropriate where an HCV forest is more intact, covers a smaller area, has a smaller area-to-perimeter ratio, and future</i></p>	<p>C</p>	<p>TNCFN must prepare itself to address this criterion in greater detail once it has members with HCVFs.</p>

<p><i>tenure is uncertain, based on social considerations.</i></p>		
<p>9.3.a. Forest management plans and activities are appropriate for maintaining, enhancing and/or restoring attributes that make the area an HCVF.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Passive management activities are carried out when they maintain, enhance, or restore HCVF characteristics and/or enlarge the size of the HCVF.</i> • <i>When prescribed burns, removal of invasive species, and integrated pest management activities are carried out, they occur in a manner consistent with maintenance, protection and/or restoration of HCVF characteristics.</i> • <i>When timber harvesting is carried out, it occurs in a manner that is consistent with HCVF maintenance, enhancement, or restoration.</i> 	C	<p>TNCFN’s group member does not have any HCVFs at this time. However, P. Bundy is managing 100 yr. old Red pine to develop old growth characteristics through passive management. In the future, this may become an HCVF.</p>
<p>9.3.b. Active management in HCVFs is allowed only when it maintains or enhances high conservation values.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Maintenance of old-growth and HCVF attributes may be carried out by: (1) removal of exotic species and (2) use of controlled burning.</i> 	NA	<p>TNCFN’s group does not yet contain HCVFs.</p>
<p>9.3.c. The management-plan summary includes information about HCVF management without compromising either the confidentiality of the forest owner or manager or environmentally and culturally sensitive features (see also sub-Criterion 7.1.f).</p>	C	<p>P. Bundy’s management plan is on the public record. He describes the Red pine stand and the goals for its management in it.</p>
<p>9.3.d. Forest owners or managers of HCVFs (forests and/or stands) coordinate conservation efforts with forest owners or managers of other HCVFs in the landscape.</p>	C	<p>P. Bundy includes landscape level analysis in the management of the property at Esden Lake. For example, the oaks on his property are among the few that have not been harvested in recent history.</p>
<p>C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	C/ NC	<p>TNCFN must prepare itself to address this criterion in greater detail once it has members with HCVFs.</p> <p>CAR 2009.4: TNCFN must ensure that its members turn in copies of documentation required by the SCS Group Management Standard and TNCFN’s own Forest Management Manual. These include ownership documents, timber volume information, silvicultural systems, annual harvest rates, provisions for monitoring growth and dynamics, species selection, inventorying and monitoring practices, equipment, exotic species, High Conservation</p>

		Values, and Cultural sites and historical resources. Once it has these documents, TNCFN must conduct its review and determine what follow up actions, if any, are required to ensure that group members are adequately prepared to participate in its program.
9.4.a. Forest owners or managers of small forests may satisfy this requirement with informal observations (see 8.1 and 8.2.). When observations detect changes, the changes are documented.	C	P. Bundy’s forest inventory system and walk thru of the property are sufficient monitoring to detect changes in the Red pine stand- even though it is not considered an HCVF.
9.4.b. Forest owners or managers of mid-sized and large forests monitor activities within and adjacent to HCVFs that may affect HCVF attributes (see Criteria 7.2, 8.1 and 8.2). Monitoring is adequate to track changes in HCV attributes, and may include informal observations. When monitoring detects changes to HCV attributes, the changes are documented.	NA	TNCFN contains no group members of mid- to large-sized forests.

1.1 Controversial Issues

The auditor uncovered no controversial issues during the full evaluation.

2.0 TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS

This section of the report addresses the procedures employed by the forest managers to track the flow of wood products from the point of harvest through to the point where custody is assumed by another entity (i.e., the wood products purchaser). The fundamental requirement that must be demonstrated by the forest management operation is that product from the certified forest area not be mixed with product from non-certified sources. This requirement is attained by compliance with the FSC Criteria for chain of custody. It is against these Criteria that SCS evaluated TNCFN for potential award of chain of custody certification.

TNCFN has supplied to the SCS evaluation team a written description of its log handling and tracking procedures entitled: *Forest Management Manual: True North Certified Forestland Network™ of the True North FSC Group Certification Program*. Based upon a review of section D of that document, interviews with TNCFN personnel and field inspections, we conclude the following.

2.1 Evaluation of Risks of Mixing Certified and Un-Certified Product

Since TNCFN only has one group member, and the areas outside of the scope of certification are a powerline right-of-way and a home site, the risks of mixing certified and un-certified product is really low since these areas are void of trees. Most of the neighbors, with the exception of the MN DNR, do not practice intense forest management. The MN DNR forestland is FSC certified and property boundaries are well marked to avoid timber theft issues.

TNCFN expects its group members to employ the following guidelines in their FM/CoC procedures:

Group Members must use their assigned FM/CoC sub-code in all FSC claim documentation. Group Members are responsible for identifying materials being harvested from their property as certified products for the purposes of meeting the forest management/chain-of-custody certification standard. When conducting a harvest of timber or non-timber products the harvesting contract, load-tickets and other documents shall identify the forest management/chain-of-custody number for the property.

The Group Member shall submit any use of the FSC logo to the Group Manager for approval prior to use. Any use of the FSC logo must comply with FSC trademark requirements and be approved by the certification body.

2.2 Description of the Log Control System

As P. Bundy was previously certified, he was able to show references to his FSC sub-code on past timber sales and included specifications in the timber harvest prescription for sales intended to maintain FSC certification. Logs are marked at the landing for destination to appropriate mills and accompanying documentation, such as load-tickets, are used to track logs. Since all property boundaries are well-marked and the areas outside the scope of certification are void of trees, there is extremely low risk of mixing with uncertified product on site.

2.3 End Point of Chain of Custody

There is but one entrance and exit from the Bundy Property for logging vehicle use. Accordingly, all logs are stored at a single designated area during timber operations. From this point on, all timber leaving the property must be appropriately marked and accompanied with relevant documentation to maintain the chain of custody.

2.4 Visual Identification at End Point of Chain of Custody

Load tickets, harvesting contracts, and timber marking are all used to track logs once they have left the landing area for an off-site destination.

3.0 GROUP MANAGEMENT

3.1 Division of Responsibilities

See section 1.4.4.

3.2 Conformance with Group Management Criteria

TNCFN clearly has a well-designed program as described in its program manual, including a description of evaluation and monitoring of group members according to the Lake States-Central Hardwoods Regional Standards. However, its initial review of the Bundy Property did not cover all of the elements they outlined in their manual. See the group management certification conformance table and CAR 2009.4 for more details.

TNCFN currently oversees one group member who has a long history with the FSC. Its group forest management manual details its supervisory role as well as policies applicable to new group members. In subsequent audits, SCS will focus even greater attention to the implementation of TNCFN's group management program policies, especially as it relates to the monitoring of group members for conformance to the applicable FSC Standards and SCS' Group Management Standard.

3.3 Group Sampling and surveillance.

At the time of the certification evaluation, there was only one group member and thus a single FMU to visit.

3.4 Group Size and Scope

TNCFN intends for the group to covers small and some mid-size properties in Minnesota. TNCFN is required to notify SCS before enrolling new group members. Thus SCS review of group expansion will be ongoing. If the number or size of groups members changes significantly or the organizational capacity of TNCFN changes, then SCS will conduct the necessary auditing to ensure that adequate oversight of group member conformance is occurring.

3.5 Group Members

Name	Certificate Subcode	Contact Details	# of FMU's	Total Area (acres)	Area managed by			Products
					Private	State	Community	
Peter Bundy		Masconomo Forestry, Crosby MN 56441	1	181	X			Saw logs

3.6 Group Management Evaluation

Requirement	C/N/C	Comment/CAR
Group Management		
C1 Authority of the group entity.	C	
1.a. In order to be eligible to apply for group certification, the group applicant must be an independent legal entity or an individual acting as a legal entity.	C	The True North Certified Forestland Network (TNCFN) is an independent legal entity incorporated as a non-profit corporation in the State of Minnesota and recognized as a Section 501(c)(3) tax-exempt organization by the Internal Revenue Service.
1.b. The group entity's responsibilities, for example with respect to management planning, monitoring, harvesting, quality control, marketing, processing, etc., shall be clearly defined and documented.	C	The TNCFN Forest Management Manual's section titled "Roles & Responsibilities" clearly defines the responsibilities of the group entity, manager, and members.
1.c. The group entity shall be contractually responsible to the certification body for ensuring that the <i>FSC P&C</i> are fully implemented by all members of the group.	C	TNCFN declares its contractual responsibility to the certification body in the Forest Management Manual's section titled "Roles & Responsibilities."
1.d. The group entity shall be responsible for ensuring that any conditions on which certification is dependent,	C	TNCFN declares its responsibility to ensure that certification conditions are met in the Forest

and any corrective actions issued by the certification body thereafter, are fully implemented.		Management Manual’s section titled “Roles & Responsibilities.”
1.e. The group entity shall have the authority to remove members from the scope of the group certificate if the requirements of group membership, or any corrective actions issued by the certification body, are not complied with.	C	This authority is stated in the “Roles & Responsibilities” section of the Forest Management Manual.
1.f The group entity shall have sufficient legal and management authority and technical support to implement the responsibilities specified in 1.b-1.e, above.	C	TNCFN has a contract with its only current member that establishes this authority.
C2 Group membership requirements and responsibilities.	C	
2.a The group entity must have clear rules regarding eligibility for membership of the group certificate.	C	Group membership eligibility is described in a section 3A of the TNCFN Forest Management Manual. Group members must own at least 10 acres in the State of Minnesota.
2.b The group members' management responsibilities, for example with respect to management planning, monitoring, harvesting, quality control, marketing, processing, etc. shall be clearly defined and documented.	C	TNCFN’s Forest Management Manual “Roles & Responsibilities” section defines the group member’s roles in this regard. Harvesting, quality control, processing and other attributes are covered in the requirements for group member management plans.
2.c If new members can join the certified group after a certificate has been awarded, the group entity shall have clear, documented procedures for this. It is recommended that new group members must complete a probationary period or initial inspection before any products from their forest area are eligible to enter into a certified chain of custody, and hence to carry the FSC Logo.	C	This is documented in section 3B of TNCFN’s Forest Management Manual. TNCFN review applicant management plans and conducts a site visit.
C3 Informed consent of group members.	C	
3.a The group entity must provide each group member with documentation, or access to documentation, specifying the relevant terms and conditions of group membership. The documentation shall include:	C	TNCFN’s Forest Management Manual provides clear guidance in specifying terms and conditions of group membership.
i) Access to a copy of the Forest Stewardship Standard to which the group is committed;	C	The Forest Management Manual states that it will provide a copy to each group member.
ii) Explanation of certification process;	C	This is provided in section 6.A.: Certification Process of the Forest Management Manual.
iii) Explanation of certification body's, and FSC's, rights to access to the group members' forests for the purposes of evaluation and monitoring;	C	This is explained in section 6.B of the Forest Management Manual.
iv) Explanation of certification body's, and FSC's requirements with respect to public information;	C	As stated in TNCFN’s Forest Management Manual, “The Group Manager will provide public access to summary information about the group as needed to support stakeholder consultation and to comply with the FSC

		standards.”
v) Explanation of any obligations with respect to group membership, such as: a) maintenance of information for monitoring purposes; b) use of systems for tracking and tracing of forest products; c) requirement to conform with conditions or corrective actions issued by the certification body; d) any special requirements related to marketing or sales of products covered by the certificate; e) other obligations of group membership; and	C	TNCFN’s Forest Management Manual is exemplary in its explanation of group membership obligations. Section 6.D. cover use of the FM/CoC sub-code, logo and tracking forest products. TNCFN relies on each group members’ method of tracking and tracing forest products from stump to gate. For CoC group, TNCFN has guides and webinars. FM has no CoC guide, but no need has arisen yet.
vi) Explanation of any costs associated with group membership	C	TNCFN provides a clear explanation on the costs of membership.
3.b A 'consent form' or its equivalent must be signed by each group member or the member’s representative who voluntarily wishes to join the certification scheme. The consent form: i) acknowledges and agrees to the obligations and responsibilities of group membership; ii) agrees to membership of the scheme for the full period of validity of the group certificate; and iii) authorizes the group entity to apply for certification on the member's behalf.	C	TNCFN has detailed this in the Section 6.E of the Forest Management Manual.
C4 Group Records	C	
4.a The group entity shall be responsible for maintaining the following records up to date at all times:	C	TNCFN outlines its record keeping process in its Forest Management Manual.
i) List of names and addresses of group members, together with date of entry into group certification scheme;	C	There is currently only one group member.
ii) Maps of all forest areas included in the group certification;	C	TNCFN possesses a copy of the Bundy MP that includes a map.
iii) Records demonstrating landownership of group members;	C / N C	TNCFN’s group member presented ownership documents to the auditor. However, TNCFN did not have a copy in its possession at the time of the audit. CAR 2009.4: TNCFN must ensure that its members turn in copies of documentation required by the SCS Group Management Standard and TNCFN’s own Forest Management Manual. These include ownership documents, timber volume information, silvicultural systems, annual harvest rates, provisions for monitoring growth and dynamics, species selection, inventorying and

		monitoring practices, equipment, exotic species, High Conservation Values, and Cultural sites and historical resources. Once it has these documents, TNCFN must conduct its review and determine what follow up actions, if any, are required to ensure that group members are adequately prepared to participate in its program.
iv) Evidence of consent of all group members, preferably in the form of a signed 'consent form' (see 3.b)	C	TNCFN has a signed consent form for its only group member.
v) Relevant documentation and records regarding forest management of each group member (e.g. management plans, summary information regarding silvicultural system, management operations, volume production);	N C	CAR 2009.4: TNCFN must ensure that its members turn in copies of documentation required by the SCS Group Management Standard and TNCFN's own Forest Management Manual. These include ownership documents, timber volume information, silvicultural systems, annual harvest rates, provisions for monitoring growth and dynamics, species selection, inventorying and monitoring practices, equipment, exotic species, High Conservation Values, and Cultural sites and historical resources. Once it has these documents, TNCFN must conduct its review and determine what follow up actions, if any, are required to ensure that group members are adequately prepared to participate in its program.
vi) Records demonstrating the implementation of any internal control or monitoring systems (see 1.b - 1.e above). Such records shall include records of internal inspections, non-compliance identified in such inspections, actions taken to correct any such non-compliance;	C	TNCFN has developed forms and procedures for internal auditing and site visits that are intended to document non-conformities and management activities.
vii) Relevant documentation regarding production and sales; and	N A	TNCFN's group member does not have any upcoming sales.
viii) The date of leaving of any group members, and an explanation of the reason why the member left the group.	N A	No group member has left.
4.b The same documentation shall be archived for at least 5 years.	C	TNCFN clearly explains that documentation is to be kept in group management files for at least 5 years.
C5 Certification Costs	C	
5.a The group entity shall be fully responsible to the certification body for paying all the costs of evaluation and monitoring throughout the period of validity of the certificate. The group entity may divide these costs amongst group members as it deems appropriate.	C	Explanations of certification costs are clearly defined in TNCFN's manual.
5.b The group entity may not issue sub-licenses for use of the FSC Logo or other FSC Trademarks.	C	TNCFN clearly states that it must approve all use of the FSC logo and trademarks prior to a

		group member's use.
C6 Group Turnover	C	
6.1 If a group member joins or leaves either the group or the group certification scheme, the group entity shall inform the certification body within one month.	C	This is explicitly stated in section 3.D. of TNCFN's Forest Management Manual.

Appendix 1 Preliminary Evaluation Report