



## 1 SCOPE OF CERTIFICATE

The scope of the assessment falls within the Temperate Forest Zone and includes 3 Forest Management Units (FMUs) as described below.

# FOREST MANAGEMENT CERTIFICATION REPORT

## SECTION A: PUBLIC SUMMARY

<b>Project Nr:</b>	<b>600320</b>		
<b>Client:</b>	<b>National Forests of Florida</b>		
<b>Web Page:</b>	<b><a href="http://www.fs.fed.us/r8/florida/projects/">http://www.fs.fed.us/r8/florida/projects/</a></b>		
<b>Address:</b>	325 John Knox Road Tallahassee, Florida 32303		
<b>Country:</b>	USA		
<b>Certificate Nr.</b>	n/a	<b>Certificate Type:</b>	Forest Management
<b>Date of Issue</b>	n/a	<b>Date of expiry:</b>	n/a
<b>Forest Zone:</b>	Temperate		
<b>Total Certified Area</b>	1,179,041 acres		
<b>Scope:</b>	Forest Management of forests & plantations in the state of Florida USA for the production of softwood/hardwood timber and other resource values: Appalachiachola National Forest Oceola National Forest Ocala National Forest		
<b>Company Contact Person:</b>	Carl Petrick, Ecosystem Staff Officer		
<b>Address:</b>	325 John Knox Road, Tallahassee, FL 32303		
<b>Tel:</b>	850-523-8509		
<b>Fax</b>			
<b>Email:</b>	cpetrick@fs.fed.us		

---

<b>Evaluation dates:</b>	
<b>Main Evaluation</b>	February 12-16, 2007
<b>Surveillance 1</b>	n/a
<b>Surveillance 2</b>	n/a
<b>Surveillance 3</b>	n/a
<b>Surveillance 4</b>	n/a

---



## TABLE OF CONTENTS

<b>1.</b>	<b>SCOPE OF CERTIFICATE .....</b>	<b>5</b>
<b>2.</b>	<b>COMPANY BACKGROUND.....</b>	<b>7</b>
2.1	Ownership .....	7
2.2	Company Key Objectives .....	7
2.3	Company History .....	8
2.4	Organisational Structure.....	8
2.5	Ownership and Use Rights.....	9
2.6	Other Land Uses .....	9
2.7	Non-certified Forests .....	9
<b>3.</b>	<b>Group Management (not relevant).....</b>	<b>9</b>
<b>4.</b>	<b>FOREST MANAGEMENT SYSTEM .....</b>	<b>9</b>
4.1	Bio-physical setting (Not required for SLIMF).....	9
4.2	History of use (Not required for SLIMF).....	10
4.3	Planning process.....	10
4.4	Harvest and regeneration.....	10
4.5	Monitoring processes .....	11
<b>5.</b>	<b>SOCIO-ECONOMIC AND ENVIRONMENTAL CONTEXT .....</b>	<b>11</b>
5.1	Social aspects .....	11
5.2	Environmental aspects (Not required for SLIMF) .....	12
5.3	Administration, Legislation and Guidelines (Not required for SLIMF) .....	13
<b>6.</b>	<b>CHANGES IN MANAGEMENT, HARVESTING, SILVICULTURE AND MONITORING .....</b>	<b>13</b>
<b>7.</b>	<b>PREPARATION FOR THE EVALUATION .....</b>	<b>14</b>
7.1	Schedule .....	14
7.2	Team .....	14
7.3	Checklist Preparation .....	15
7.4	Stakeholder notification .....	15
<b>8.</b>	<b>THE EVALUATION .....</b>	<b>15</b>
8.1	Opening meeting .....	16
8.2	Document review.....	16
8.3	Sampling and Evaluation Approach.....	16
8.4	Field assessments.....	16
8.5	Stakeholder interviews (Not required for SLIMF).....	16
8.6	Summing up and closing meeting .....	17
<b>9.</b>	<b>EVALUATION RESULTS.....</b>	<b>17</b>
9.1	Findings related to the general QUALIFOR Programme .....	17
	PRINCIPLE 1: Compliance with law and FSC Principles .....	17
	PRINCIPLE 2: Tenure and use rights and responsibilities .....	18
	PRINCIPLE 3: Indigenous peoples' rights.....	19

PRINCIPLE 4:	Community relations and workers rights .....	19
PRINCIPLE 5:	Benefits from the forest .....	21
PRINCIPLE 6:	Environmental impact.....	21
PRINCIPLE 7:	Management plan .....	23
PRINCIPLE 8:	Monitoring and evaluation .....	24
PRINCIPLE 9:	High Conservation Value Forests.....	24
PRINCIPLE 10:	Plantations .....	25
<b>10.</b>	<b>CERTIFICATION DECISION.....</b>	<b>26</b>
<b>11.</b>	<b>MAINTENANCE OF CERTIFICATION .....</b>	<b>26</b>
<b>12.</b>	<b>RECORD OF CORRECTIVE ACTION REQUESTS (CARs) .....</b>	<b>27</b>
<b>13.</b>	<b>RECORD OF OBSERVATIONS .....</b>	<b>31</b>
<b>14.</b>	<b>RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS .....</b>	<b>32</b>
<b>15.</b>	<b>RECORD OF COMPLAINTS .....</b>	<b>34</b>

**ASSOCIATED DOCUMENTS (not part of the Public Summary)**

<b>AD 20:</b>	<b>Evaluation Itinerary</b>
<b>AD 21:</b>	<b>Attendance Record</b>
<b>AD 36-B:</b>	<b>Evaluation - Observations and Information on Logistics</b>
<b>AD 38:</b>	<b>Peer Review Report</b>
<b>AD 40:</b>	<b>Stakeholder Reports</b>
	<b>Evaluation team CV's</b>
	<b>List of stakeholders contacted</b>

**Complaints and Disputes**

Procedures for submitting complaints, appeals and disputes, and the SGS processing of such are published on [www.sgs.com/forestry](http://www.sgs.com/forestry). This information is also available on request – refer contact details on the first page.



## INTRODUCTION

The purpose of the evaluation was to evaluate the operations of the National Forests of Florida against the requirements of the QUALIFOR Programme, the SGS Group's forest certification programme accredited by Forest Stewardship Council.

### 1. SCOPE OF CERTIFICATE

The scope of the certificate falls within the Temperate Forest Zone and includes 3 of Forest Management Units (FMUs) as described below.

Description of FMUs:				
Description	Ownership	Area (ha)	Longitude E/W	Latitude N/S
Apalachicola 565,688 ac	USDA Forest Service	228,933	84.28 W	30.47 N
Osceola 162,628 ac plus (Pinhook Purchase Unit 44,338 ac)		65,816		
Ocala 383,584 ac		17,944		
		155,236		
Total: 1,156,238 acres		467,930		

Size of FMUs:		
	Nr of FMUs	Area (ha)
Less than 100ha		
100 to 1000 ha in area		
1001 to 10000 ha in area		
More than 10000 ha in area	3	467,930
Total	3	467,930

Total Area in the Scope of the Certificate that is:	
	Area (ha)
Privately managed	
State Managed	467,930
Community Managed	

Composition of the Certified Forest(s)	
	Area (ha)
Area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives	147,157
Area of forest protected from commercial harvesting of timber and managed primarily for production of NTFPs or services	
Area of forest classified as "high conservation value forest"	

<b>Composition of the Certified Forest(s)</b>	
	<b>Area (ha)</b>
<b>Total area of production forest (i.e. forest from which timber may be harvested)</b>	256,311
<b>Area of production forest classified as "plantation"</b>	
<b>Area of production forest regenerated primarily by replanting</b>	
<b>Area of production forest regenerate primarily by natural regeneration</b>	

<b>List of High Conservation Values</b>	
<b>Description</b>	<b>Notes</b>
Pinhook Forest	Connectivity with Okefenokee NWR
Old Growth Forest on Apalachicola NF (14,278 ha)	Old Growth designations are included in the Management Area Desired Future Conditions (DFCs) on Ocala and Osceola NF
Longleaf Pine Wiregrass Ecosystem	Red-cockaded Woodpecker Habitat

<b>Timber Production</b>				
<b>Species (botanical name)</b>	<b>Species (common name)</b>	<b>Area (ha)</b>	<b>Maximum 7-year Sustainable Yield (m<sup>3</sup>)</b>	
			<b>Projected</b>	<b>Actual</b>
Pinus elliotii	Slash Pine			
Pinus clausa	Sand Pine			
Pinus palustris	Longleaf Pine			
<b>Totals</b>			103 MMCF	44 MMCF

<b>List of Timber Product Categories</b>	
<b>Product</b>	<b>Notes</b>
Slash and Longleaf Pine pulpwood and sawtimber	Sold as standing timber (stumpage)
Sand Pine pulpwood	Sold as standing timber (stumpage)
<b>Totals</b>	

<b>Approximate Annual Commercial Production of Non-Timber-Forest-Products</b>				
<b>Product</b>	<b>Species</b>		<b>Unit of measure</b>	<b>Total units</b>
	<b>Botanical Name</b>	<b>Common Name)</b>		
Decorative Moss	Cladonia spp.	Deer Moss	lbs	1,780
Firewood	Quercus spp.	oak	CCF	321
Pine Boughs	Pinus spp.	Pine	Pieces	32,000
Pine straw	Pinus spp.	Pine	Bushels	3
Palmetto berries and fronds	Serenoa sp	Palmetto	Lbs	20,000
			pieces	30,000
Plants	various	various	Lbs	4,004

Approximate Annual Commercial Production of Non-Timber-Forest-Products				
Product	Species		Unit of measure	Total units
	Botanical Name	Common Name)		
			pieces	6,221
Poles	various	various	Pieces	505
Crooked Wood	Various	Various	Pieces	84,450
Christmas trees	Pinus spp.	Pine	pieces	139

## 2. COMPANY BACKGROUND

### 2.1 Ownership

The National Forests in Florida are owned by the United States and administered by the USDA Forest Service.

### 2.2 Company Key Objectives

Objective	Notes
<b>Commercial</b>	
Harvest up to 103 million cubic feet of wood in ten year planning period.	
Restore Longleaf Pine – Wiregrass Ecosystem	
<b>Social</b>	
Contribute to the social and economic well being of communities by promoting sustainable use of renewable natural resources and participating in efforts to devise creative solutions to economic health.	Payments to counties and rural development programs.
Provide a variety of recreational opportunities including hunting, fishing, hiking, camping, horseback riding and boating.	Amenity values for local residents and visitors.
Provide Wilderness, Wild and Scenic River, Scenic Byway, Special Designation Area opportunities.	
<b>Environmental</b>	
Maintain or, where necessary, restore ecosystem composition, structure, and function within the natural range of variability in all ecosystems, with emphasis on longleaf pine-wiregrass, sand pine-oak scrub, pine flatwoods, hardwood/cypress, oak hammock ecosystems, and other imperiled specialized communities.	
Manage floodplains, groundwater, lakes, riparian areas, springs, streams, and wetlands to protect or enhance their individual values and ecological functions.	
Conserve and protect important elements of diversity such as endangered and threatened species habitat, declining natural communities, and uncommon biological, ecological, or geological sites.	

Objective	Notes
Manage for habitat conditions to recover and sustain viable populations of all native species, with special emphasis on rare species.	

**2.3 Company History**

The National Forests of Florida consist of three National Forests: The Ocala, Osceola and Apalachicola. The Ocala is the oldest National Forest east of the Mississippi River and was established in 1908. The Osceola was established by Herbert Hoover in 1931 and the Apalachicola in 1936. All three forests were combined administratively in 1936 as the National Forests in Florida.

Apalachicola National Forest (NF) is a large area of public forestland in Florida's "panhandle." It is adjacent to the city of Tallahassee. This forest is characterized by vast flatwoods and sandhills of longleaf, slash, and loblolly pine forests; and it is home to the largest known population of the endangered red-cockaded woodpecker. These fire dependent ecosystems are maintained by the largest prescribed burning program on national forests in the nation. The landscape is threaded by bay, cypress, and *titi* swamps, seepage bogs, and open savannahs rich with endemic plant species. The Apalachicola River borders the forest to the west; and the scenic Ochlockonee, Sopchoppy, and New Rivers meander through the forest on their journey to the Gulf of Mexico. The underlying geology provides numerous sinkholes and one of the longest known underground water cavern systems in the world.

Special attributes found on the forest are the Apalachee Savannahs Scenic Byway, Trout Pond Recreation Area (specifically designed to accommodate persons with disabilities), Munson Hills Off-Road Bicycle Trail (the first trail in the Southern Region designed specifically for mountain bikes), Florida National Scenic Trail (its longest stretch extends through wilderness on this forest), and a municipal airport within the forest boundary. Uses of the forest range from timber harvesting to worm "grunting" to tupelo honey production.

Choctawhatchee National Forest was established in 1908 and managed by the Forest Service until 1940, when all lands were transferred to the War Department. Most of this land is now Eglin Air Force Base. Land may be restored to national forest status when it is no longer needed for military purposes. About 1,100 acres have been transferred to the Forest Service. Most of this land is under special-use permit to State and county governments. This forest is administered by the Apalachicola Ranger District.

Ocala National Forest, the oldest national forest east of the Mississippi River within the continental United States, is noted for its sand pine scrub ecosystem. The rolling hills contain the largest concentration of sand pine in the world. Growing on deep, prehistoric sand dunes, the sand pine scrub is home to the threatened Florida scrub-jay, sand skink, and Florida *bonamia* plant. Within this sea of sand pine, longleaf pine islands provide a different view with open, parklike stands of trees over grassy plains. Wildlife species of interest include the bald eagle, Florida black bear, Florida manatee, gopher tortoise, indigo snake, and red-cockaded woodpecker.

The forest's porous sands and largely undeveloped character provide an important recharge for the Floridan aquifer. Freshwater springs produce several hundred million gallons of water each day. Crystal clear springs, pothole marshes, and sinkhole lakes provide year-round recreational opportunities and unique aquatic habitats. A subtropical environment and a location near Disney World make the Ocala NF a popular destination for thousands of visitors from the United States and abroad.

Osceola National Forest is a mosaic of low pine ridges separated by cypress and bay swamps. Located near the crossroads of I-10 and I-75, this forest is within an hour's drive of more than one million people. The local population, as well as the residents of Jacksonville and Gainesville, enjoys the recreation that centers around Ocean Pond, a shallow, natural lake. Facilities are available for boating, camping, picnicking, and swimming. A 22-mile segment of the Florida National Scenic Trail passes through the Osceola NF, with many boardwalk sections traversing gum swamps and cypress ponds.



The Big Gum Swamp Wilderness provides 13,500 acres in which visitors can enjoy a challenging, natural setting.

History plays an important role on the Osceola NF. The historic Olustee Depot and the Trampled Track interpretive trail give a glimpse at the rich history of the forest. Remnants of old railroad grades, used to move logs to sawmills, crisscross the forest. Osceola NF has been known for its ability to produce high-quality timber. Olustee Experimental Forest was established in the 1930s to provide research for the naval stores industry. Trees across the forest were tapped for resin, and remnants of old turpentine camps can be found in the forest. The annual reenactment of the Battle of Olustee, the largest Civil War battle fought in Florida, attracts thousands of visitors each February to the Olustee Battlefield.

The northern portion of the forest is characterized by Pinhook Swamp and Impassable Bay. These wetland ecosystems link the forest to Okefenokee Swamp and form the headwaters of the Suwannee River and St. Mary's River. The area provides important habitat for many plants and animals and is a potential reintroduction site for Florida panthers.

## **2.4 Organisational Structure**

The National Forests in Florida are administered out of the Supervisor's Office in Tallahassee, Florida. There are District Ranger offices on each of the three national forests. The Forest Supervisors office has a Supervisor and Deputy, and Staff Officers that coordinate the overall management of the NFF. Forest level positions such as Forest Engineer, Ecosystem Staff Leader, Fire Management Officer, and Forest Archaeologist are found here. District Rangers provide the leadership to run the district organizations that include staff such as Foresters, Silviculturist, Wildlife Biologists, NEPA Coordinators, Outdoor Recreation Specialists, Business Management Specialists, Timber Sale Administrator, Fire Management Officers and crews, and a variety of technicians, forest workers and volunteers.

## **2.5 Ownership and Use Rights**

The NFF customarily consult with local communities, citizens and Native American tribes of proposed management activities. Tribes are consulted in case a proposed action may affect lands considered sacred or special by the tribes. This is a routine feature of NEPA analysis and public involvement.

Residents, organizations, businesses and other entities can obtain a special use permit for things such as removing forest products or a Right of Way across NFF lands if this is in the best interest of all parties.

## **2.6 Other Land Uses**

Hunting and fishing are popular activities conducted on NFF lands and waters and are jointly managed by the NFF and Florida fish and wildlife agencies. Harvesting small amounts of forest products by citizens is allowed. Larger amounts of forest products are sold to the highest bidder who is qualified to do the work and the contract is administered by timber sale administrators. Some grazing permits are issued on the Appalachian NF. Outfitter-Guide permits are required by commercial tour operators who conduct business on NFF lands.

## **2.7 Non-certified Forests**

None of the NFF lands are currently certified.

## **3. GROUP MANAGEMENT**

Not relevant

## **4. FOREST MANAGEMENT SYSTEM**

### **4.1 Bio-physical setting**

The National Forests in Florida lie within the humid temperate domain, subtropical division, and outer coastal plain mixed forest province. At the next lower levels, the Appalachian National Forest (NF) lies within the

Florida Coastal Lowlands western section and the Coastal Plain and Flatwoods lower section. Subsections include Gulf Coastal Flatwoods, Southern Coastal Plains, and Gulf Southern Loam Hills. The Osceola NF lies within the Atlantic Coastal Flatwoods section. Subsections include the Upper Terraces, Okefenokee Uplands, and Okefenokee Swamp. The Ocala NF lies within the Coastal Plains and Flatwoods lower section and the Central Florida Highlands subsection.

#### **Geography:**

From the northwest corner of the state, the Florida Uplands run about 275 miles west to east, along the northern edge of the Florida Panhandle and then extends south into the central area of the Florida peninsula. The width of the northern Florida Uplands varies from around 30 to 50 miles and is characterized by low rolling hills of red clay. Hard and softwood forests are plentiful. The section of the Florida Uplands that extends south into the peninsula, covers an area about 100 miles wide and 160 miles long. This area extends from the north, south and to the east, to separate the two sections of the East Gulf Coastal Plain and to separate the East Gulf Coastal Plain from the Atlantic Coastal Plain. The landscape in the southern Florida Uplands is characterized by low hills and many lakes. Though the Florida Uplands are only 200-300 feet above sea level, they are still higher than the regions of the Atlantic Coastal Plain and the East Gulf Coastal Plain. The highest point in Florida is found in the Florida Uplands that run along the northern edge of the panhandle.

#### **Ecology:**

Vegetation Classification: Northern Florida has a variety of natural communities and a variety of classification systems. The Florida Natural Communities Guide published by the Florida Department of Natural Resources is one of the primary classification systems. Some of the more common natural communities include Xeric Uplands - very dry, deep, well-drained hills of sand with xeric-adapted vegetation. Mesic Uplands are dry to moist hills of sand with varying amounts of clay, silt or organic material; diverse mixture of broad leaved and needle leaved temperate woody species. Mesic Flatlands are flat, moderately well-drained sandy substrates with admixture of organic material, often with a hard pan. Wet Flatlands are flat, poorly drained sand, marl or limestone substrates.

Climate: Northern Florida has a humid temperate climate with an average annual rainfall of 50-60 inches. Thunderstorms are common and damaging hurricanes occur annually. Monthly average temperatures range from a high of 91.7 degrees to a low of 39.9 degrees. The lowest temperature in Florida, -2°, was recorded on February 13, 1899 at Tallahassee. The highest temperature recorded in Florida is 109°, Fahrenheit. This record high was recorded on June 29, 1931 at Monticello.

## **4.2 History of use**

The Apalachicola and Osceola National Forests are dominated by Longleaf Pine – Wiregrass forests. These forests were described by early travellers as open, park-like stands of pines with a grassy understory. Anthropogenic activities within the last century have greatly fragmented these forests. Timber activities removed over 90 percent of the mature pines in the 1920's and altered the structural complexity of the understory that was originally characteristic of the natural ecosystem. The Ocala National Forest had similar anthropogenic activities and fires in the sandy Slash Pine forests.

## **4.3 Planning process**

- The NFF is governed by the National Forest Management Act which requires a comprehensive Forest Plan. The Forest Plan is developed with public involvement under the National Environmental Policy Act. The Forest Plan has Goals and Desired Future Conditions both forestwide and in its designated Management Areas. Policy such as rotation lengths of forest types for sand or longleaf pine are described for these management areas. Financial planning is based on annual Congressional appropriations which may vary considerably from year to year.
- The NFF uses an Adaptive Management philosophy to develop and revise policies and operating procedures. Annual monitoring reviews and reports, research, field studies, and evaluation reports are utilized. The revised policies are uniformly applied across the three forests by program leaders and other staff.
- The NFF use a comprehensive monitoring program to assess progress in meeting Forest Plan goals and objectives.

**4.4 Harvest and regeneration**

- Stand establishment can be natural or planted depending on site specific conditions and management intent. Planting stock such as longleaf pine seedlings or containerized stock is available as is seed for sand pine. Machine and hand planting, row seeding, prescribed fire and mechanical and herbicide treatments are used to create suitable stocking and growing conditions.
- Maintenance and improvement using prescribed fire is commonly used. Thinning to improve stand quality is used in certain stands to improve quality, maintain stocking levels for red-cockaded woodpecker habitat and to provide forest products.
- Forest inventories are conducted to determine stand conditions, stocking levels, possible treatments and for other reasons. Inventory levels are determined by management area with those having a timber production goal having more comprehensive surveys than Wilderness.
- Yield prediction used detailed models is routinely used for the Forest Plan and harvesting prescriptions.
- A small amount of road building occurs under the direction of the Forest Engineer in suitable locations. Road maintenance funds are limited and occur primarily as a result of public safety and access needs and as a result of timber harvest operations.
- Harvesting operations are conducted in suitable management areas under the requirements of NEPA. Treatment methods include clearcutting, shelterwood, thinning and group and individual tree selection.
- Harvesting operations are conducted by contractors under the supervision of timber sale administrators.

**4.5 Monitoring processes**

Monitoring is an active and ongoing process on the NFF. An annual monitoring report is provided to the public and every five years a consolidated five year report comes out. Monitoring is done at all levels of the NFF. Task sheets are used to identify the goal, objective, standard, monitoring question, frequency, reliability, who collects and the method of collection.

For example: conclusions about population trends for MIS species and their relationship to habitat are developed through a variety of approaches (page E-48). The approaches include:

1. Measurement of habitat conditions and trends (i.e. the amount and condition of habitat over time) for species for which the relationship between population measures and habitat are well known so that trends in habitat provide a reliable indication of population trends.
2. The use of population occurrence and presence/absence data to improve knowledge of species distribution, relative abundance, and habitat relationships. These measures repeated over time, may provide information on trends in distribution and relative abundance.
3. The use of population indices to track relative population trends. These indices are not actual population estimates, but are aimed at reflecting trends or possibly relative abundance for a species. Examples could include state hunting/fishing information, track counts, and bird point counts. Some of this information may also be useful in validating species/habitat relationships.
4. Actual population estimates and demographic information based on 100% population counts or sampling. This is the most intensive and rigorous methodology usually reserved for some federally listed species or high risk globally impaired species selected as MIS.
5. Development of research studies with the objective of determining species/habitat relationships, and species response to the types of habitat change created through land management activities.

**5. SOCIO-ECONOMIC AND ENVIRONMENTAL CONTEXT**

**5.1 Social aspects**

Number of own workers	Approximately 210
-----------------------	----------------------

Number of contract workers	Varies greatly by season and if there is a forest fire or hurricane recovery effort
Minimum daily wage for agricultural/forestry workers	Varies from Federal Minimum Wage to Davis-Bacon Wage Act to General Salary and Wage Grade wages
Infant mortality rates (under 5 years)	As of 2005 for Florida, 7.2 per 1,000 live deaths, U.S. it is 6.7 per 1,000
Proportion of workers employed from the local population (%)	Accurate information not available.

As the population of Florida increases, the Ocala National Forest is an island among development encroaching from all sides. Its central location provides a close drive for 8-10 million people who live in neighboring cities, such as Jacksonville, Tampa, and Orlando, to seek out the Forest as a place of recreational value. Along with this increase in the number of visitors come other urban issues you might not ordinarily find in this seemingly rural setting. For instance incidents such as the murder of two college students, methamphetamine labs in crowded recreation areas and people living on the forest make visitors question the safety of their recreation experience. Other problems range from dumping to motorized use to squatters and other illegal activities. Ethnic composition of the The Apalachicola National Forest staff is: white-73.4%, black-18.7%, hispanic-3.7%, other-1.9%.

**5.2 Environmental aspects and issues**

The principle biodiversity conservation problem in the region is the spread of invasive species. Additional issues include loss of habitat and fragmentation in adjacent areas of the forest that decrease the habitat available for wildlife. Roads and travelways lead to increasing fragmentation on the forest. The lack of adequate funding to implement restoration and management programs is also an issue.

The principle biodiversity conservation initiatives underway on the NFF include restoration of the Longleaf Pine –Wiregrass Ecosystem, Red-cockaded Woodpecker and Florida Scrub Jay habitat restoration, Pinhook Swamp acquisition, and the protection of PETS and natural areas.

**The following Summary of Issues is include in section 1.4 of the Forest Plan (RLRMP). These issues were developed by the USFS through public involvement and used to develop alternatives for the Forest Plan revision.**

- How much and by what methods should the longleaf pine-wiregrass community be restored and maintained?
- How should we maintain the sand pine-scrub oak community?
- How should we manage and protect riparian and wetland areas?
- How should special aquatic, botanic, geologic, historic, paleontological, and scenic areas be protected and managed?
- What lands should be designated as wilderness, and what practices should be permitted in these areas?
- What types, amounts, and mix of recreational opportunities should be provided, and what consideration should be given to compatibility of users?
- What should be the access policy for motorized vehicles?

What is the proper combination of open and closed roads to meet public needs?

How should we manage habitat to enhance certain wildlife populations such as game and proposed, endangered, threatened, and sensitive species?

What will be the level of timber harvest, and what silvicultural systems will be used to manage the forests?

What types of other forest products will be gathered and what uses will be permitted on the national forests?

How much and by what methods should the longleaf pine-wiregrass community be restored and maintained?

How should we maintain the sand pine-scrub oak community?

How should we manage and protect riparian and wetland areas?

How should special aquatic, botanic, geologic, historic, paleontological, and scenic areas be protected and managed?

What lands should be designated as wilderness, and what practices should be permitted in these areas?

What types, amounts, and mix of recreational opportunities should be provided, and what consideration should be given to compatibility of users?

What should be the access policy for motorized vehicles?

What is the proper combination of open and closed roads to meet public needs?

How should we manage habitat to enhance certain wildlife populations such as game and proposed, endangered, threatened, and sensitive species?

What will be the level of timber harvest, and what silvicultural systems will be used to manage the forests?

What types of other forest products will be gathered and what uses will be permitted on the national forests?

### 5.3 Administration, Legislation and Guidelines

The FEIS and Revised Forest Plan were developed according to the National Forest Management Act (NFMA), its implementing regulations, 36 Code of Federal Regulations (CFR) 219, National Environmental Policy Act (NEPA), and the Council of Environmental Quality (CEQ) regulations, 40 CFR 15001508. The FEIS discloses the environmental consequences of the alternative management strategies and how the NFF respond to issues and concerns.

The NFF works closely with other agencies including the US Fish and Wildlife Service, Environmental Protection Agency and equivalent State of Florida agencies.

The following table lists the key national legislation, regulations, guidelines and codes of best practice that are relevant to forestry in the commercial, environmental and social sectors. This list does not purport to be comprehensive, but indicates information that is key to the forestry sector.

Legislation and regulation	Notes
National Environmental Policy Act (NEPA)	The National Environmental Policy Act (NEPA) requires federal agencies to integrate environmental values into their decision making processes by considering the environmental impacts of their proposed actions and reasonable alternatives to those actions.
Endangered Species Act	The Endangered Species Act provides a program for the conservation of threatened and endangered plants and animals and the habitats in which they are found.
National Forest Management Act	The NFMA is a federal law that is the primary statute governing

	the administration of national forests and was an amendment to the Forest and Rangeland Renewable Resource Planning Act. It requires the Secretary of Agriculture to assess forest lands, and develop and implement a resource management plan for each unit of the National Forest System.
Multiple Use – Sustained Yield Act	The MUSYA authorized the Forest Service to manage national forest system lands for additional purposes, and required the Forest Service to manage for multiple use and sustained yield of the products and services of the forests.
Wilderness Act	The Wilderness Act is a federal law that created the National Wilderness Preservation System and is the principle law for designating Wilderness on federal lands.
<b>Guidelines and Codes of Best Practice</b>	<b>Notes</b>
NFF Forest Plan: Chapter 3 Forestwide Standards and Guidelines	Designates forestwide standards and guidelines.
NFF Forest Plan: Chapter 4 Management Area Goals, Desired Future Condition, Standards and Guidelines	Designates management area standards and guidelines and the desired future condition.
Florida Best Management Practices	State of Florida approved practices to prevent soil erosion and protect water quality.

## 6. CHANGES IN MANAGEMENT, HARVESTING, SILVICULTURE AND MONITORING

Not applicable

## 7. PREPARATION FOR THE EVALUATION

### 7.1 Schedule

The Evaluation was preceded by a pre-evaluation by SGS QUALIFOR during January 8-9, 2007. This examined the management systems and identified any gaps that might preclude certification. Information gathered was used to plan the main evaluation. Key stakeholders were identified.

### 7.2 Team

The table below shows the team that conducted the main evaluation and the independent specialist(s) that were selected to review the main evaluation report before certification is considered.

Evaluation Team	Notes
<b>Team Leader</b>	Has a degree from the University of Maine (1982) and 24 years of professional experience. He is qualified as an ISO 14001, EMS lead auditor, and is an SAF Certified Forester <sup>®</sup> , and Certified Forest Auditor <sup>®</sup> , and Qualifor (FSC) Programme Auditor. He is a Licensed Professional Forester (ME & NH), a Licensed Commercial Master Pesticide Applicator, and serves on Maine's Board of Pesticides Control.
<b>Specialist</b>	Has a degree from the University of New Hampshire (1979). He is an SAF Certified Forester <sup>®</sup> and Certified Sustainable Forest Management Auditor <sup>®</sup> and a RAB/QSA certified EMS Lead Auditor. He has 25 years of experience in forestry, forest policy and land conservation.
<b>Local Specialist</b>	Has a degree from Auburn University (1975), Auburn, AL, and over 29 years experience in the wildlife and environmental fields. His major areas of technical expertise include 14 years as a professional wildlife biologist for a large forest products company coordinating environmental issue management and outdoor recreation business for over six million acres of industrial forestland. He is experienced in endangered species consulting and Sustainable Forestry Initiative

	certification. He is a Certified Wildlife Biologist and RAB/QSA certified EMS Lead Auditor.
<b>Local Specialist</b>	Has a degree from the University of Florida (1980) Gainesville, FL, and over 26 year's extensive consulting experience. His major areas of technical expertise include forest economics, forest management, acquisition and disposition of real estate, wetlands restoration, and recreation management of rural lands. He is a RAB/QSA certified EMS Lead Auditor.
<b>Specialist</b>	Has degrees from Villanova University (1971) and Pennsylvania State University (1979, 1984, 1992). He is a specialist in the social dimensions of natural resource management and has extensive experience audit to FSC standards and protocols across the United States.
<b>Local Specialist</b>	Has a degree from Unity College (1976) and over 30 years of experience with the USDA-FS in various roles across the United States. He is a USFS certified Silviculturist and experienced NEPA writer with over 60 NEPA documents completed.
<b>Local Specialist</b>	Has degrees from Stephan A. Austin (1987) and Clemson (1989) Universities and 20 years of experience in forestry and wildlife management in the Southeastern US. He is a Certified Forester, Certified Wildlife Biologist, and a RAB/QSA certified EMS Lead Auditor.
<b>Peer Reviewers</b>	<b>Notes</b>
<b>Peer Reviewer 1</b>	Has degrees from the University of Wisconsin (1985) and University of Minnesota (1993) and 20 years experience in forestry internationally and nationally and currently works as a consultant on forest certification issues and forestry. His major areas of expertise are on FSC standards and policies. He has coordinated FSC-US regional and national standard setting processes, served on FSC-IC technical committees and has led audits for FSC certifying bodies.
<b>Peer Reviewer 2</b>	Has degrees from Universidad Politécnica de Madrid, Spain (1997) and University of Maine (2002). With more than nine years of experience in forest policy and management, her current work focuses on supporting and enhancing decision making processes for the management and conservation of forests nationally and internationally. Currently, she is the principal for a natural resources consulting firm and works in academia.
<b>Peer Reviewer 3</b>	Has a degree from the University of Maine (1975) and 31 years experience of professional experience in forestry., and has been a Maine Licensed Forester since 1977. His major areas of technical expertise are in silviculture and forest management, and include 13 years as Chief of Silviculture for a public agency managing over 500,000 acres of multiple use forest lands. Participated as West Region Manager as these lands underwent the first ever simultaneous dual certification (FSC, SFI) in 2001, and has been land manager representative for multiple audits on public lands since then.

### 7.3 Checklist Preparation

A checklist was prepared that consisted of the documents listed below. This checklist was prepared using the FSC-endorsed national or regional standard.

Standard Used in Evaluation	Effective Date	Version Nr	Changes to Standard
FSC Accredited National Standard for Southeastern United states	2/10/05	10.0	n/a
FSC US Standards for US Dept. of Defence and US Dept. of Energy Forests	2/3/04	1.1	n/a

### 7.4 Stakeholder notification

A wide range of stakeholders were contacted before during the planned evaluation to inform them of the evaluation and ask for their views on relevant forest management issues, These included environmental interest groups, local government agencies and forestry authorities, forest user groups,

and workers' unions. The full list of stakeholders that were contacted is available from SGS. Responses received and comments from interviews are recorded under paragraph 14 of this Public Summary.

## **8. THE EVALUATION**

The Main Evaluation was conducted in the steps outlined below.

### **8.1 Opening meeting**

An opening meeting was held at the NFF Supervisors office in Tallahassee, FL. The scope of the evaluation was explained and schedules were determined. Record was kept of all persons that attended this meeting.

### **8.2 Document review**

A review of the main forest management documentation was conducted to evaluate the adequacy of coverage of the QUALIFOR Programme requirements. This involved examination of policies, management plans, systems, procedures, instructions and controls.

### **8.3 Sampling and Evaluation Approach**

A detailed record of the following is available in section B of the evaluation report. This section does not form part of the public summary, but includes information on:

- Sampling methodology and rationale;
- FMUs included in the sample;
- Sites visited during the field evaluation; and
- Man-day allocation.

The field audit was conducted by a team of 6 auditors and technical experts of the course of 5 days from February 12-16. Following an opening meeting at the NFF Supervisor's office in Tallahassee, 2-3 audit teams spent approximately 4 ½ days in the field visiting sites, interviewing staff and stakeholders and reviewing records. 2 days were spent on the Appalachicola NF, one day on the Osceola NF, and 1 ½ days on the Ocala NF. A closing meeting was held on February 16 at the Seminole Ranger district office in Umatilla, FL.

During the field audit, 61 scheduled sites were visited along with approximately 8 additional unscheduled stops. Field visits included a full variety of NFF management activities including active, scheduled and completed timber harvests (all timber operations, active during the audit, were visited); prescribed burning; Invasive plant control; planting; site preparation; recreational and interpretive sites; natural and artificial regeneration; OHV use areas (authorized and closed); and wildlife management areas. The entire geographic scope of the three national forests was covered.

### **8.4 Field assessments**

Field assessments aimed to determine how closely activities in the field complied with documented management systems and QUALIFOR Programme requirements. Interviews with staff, operators and contractors were conducted to determine their familiarity with and their application of policies, procedures and practices that are relevant to their activities. A carefully selected sample of sites was visited to evaluate whether practices met the required performance levels.

### **8.5 Stakeholder interviews**

Meetings or telephone interviews were held with stakeholders as determined by the responses to notification letters and SGS discretion as to key stakeholders that should be interviewed. These aimed to:

- clarify any issues raised and the company's responses to them;



- obtain additional information where necessary; and
- obtain the views of key stakeholders that did not respond to the written invitation sent out before the evaluation.

Nr of Stakeholders contacted	Nr of Interviews with		
	NGOs	Government	Other
<b>MAIN EVALUATION</b>			
111	22	41	48

Responses received and comments from interviews are recorded under paragraph 14 of this Public Summary.

## 8.6 Summing up and closing meeting

At the conclusion of the field evaluation, findings were presented to company management at a closing meeting. Any areas of non-conformance with the QUALIFOR Programme were raised as one of two types of Corrective Action Request (CAR):

- Major CARs - which must be addressed and re-assessed before certification can proceed
- Minor CARs - which do not preclude certification, but must be addressed within an agreed time frame, and will be checked at the first surveillance visit

A record was kept of persons that attended this meeting.

## 9. EVALUATION RESULTS

Detailed evaluation findings are included in Section B of the evaluation report. This does not form part of the public summary. For each QUALIFOR requirement, these show the related findings, and any observations or corrective actions raised. The main issues are discussed below.

### 9.1 Findings related to the general QUALIFOR Programme

<b>PRINCIPLE 1: Compliance with law and FSC Principles</b>	
<b>Criterion 1.1      Respect for national and local laws and administrative requirements</b>	
<b>Strengths</b>	Laws and regulations are exceptionally, fully codified in USDA Forest Service Manuals (FSMs) and Forest Service Handbooks (FSHs), together known as the "Forest Service Directives Systems."
<b>Weaknesses</b>	Shortfalls in implementation of key objectives of the management plan may be inhibiting compliance with the recovery plan for Red Cockaded Woodpecker, as required by the Endangered Species Act (see CAR 03).
<b>Compliance</b>	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate.
<b>Criterion 1.2      Payment of legally prescribed fees, royalties, taxes and other charges</b>	
<b>Strengths</b>	The USDA FS is a public, tax-exempt organization; however, it is required to make payments to local communities under Public Law 97-258 (Payments in Lieu of Taxes (PILT)) to offset the reduction in local property tax receipts due to non-taxable federal lands in the local jurisdiction.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate.

<b>Criterion 1.3      Respect for provisions of international agreements</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	Very few NFF staff were familiar with international agreements such as CITES or the Convention on Biological Diversity (CBO)
<b>Compliance</b>	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate.
<b>Criterion 1.4      Conflicts between laws and regulations, and the FSC P&amp;C</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	There are no known conflicts between the laws and regulations directing NFF operations and the FSC Principles and Criterion.
<b>Criterion 1.5      Protection of forests from illegal activities</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	On some sites, lines were not maintained, and not marked (see CAR 01).
<b>Compliance</b>	The NFF uses gates on clay pits for reasons of safety and to prevent the spread of invasive plants which tend to invade disturbed areas. In addition, they meet their stated target for boundary line establishment at 40 miles per year. There is no compliance associated with this Criterion.
<b>Criterion 1.6      Demonstration of a long-term commitment to the FSC P&amp;C</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	Since the NFF are not certified and are not seeking certification, there is no demonstrated long-term commitment to the FSC P&C stated in any of there documentation (see Major CAR M02).
<b>Compliance</b>	This Criterion is not addressed by NFF.
<b>PRINCIPLE 2:    Tenure and use rights and responsibilities</b>	
<b>Criterion 2.1      Demonstration of land tenure and forest use rights</b>	
<b>Strengths</b>	The NFF have thorough documentation on their legal and customary rights associated with the forest.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Compliance is achieved both from laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate and from documentation, security, and accessibility of information on the legal (e.g., deeds) and customary rights associated with the NFF, provided by forest personnel and demonstrated to SGS.
<b>Criterion 2.2      Local communities' legal or customary tenure or use rights</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Most activities on the NFF are consistent with conservation of the forest and other natural resources and the RLRMP objectives. Activities include sightseeing, hunting, fishing, hiking, biking, horseback riding, and camping. While OHV use has occurred in the past, new USDA FS rules mandate that they occur only on designated routes and areas. Also, through public stakeholder input mandated in the NEPA process there are multiple opportunities for stakeholders and other interested parties to provide input on proposed NFF management activities and their impacts on use.
<b>Criterion 2.3      Disputes over tenure claims and use rights</b>	
<b>Strengths</b>	Appropriate mechanisms are employed to resolve disputes over tenure claims and use rights. The NFF has engaged in a number of innovative processes to solve prevent or resolve

	problems in this area of concern.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Prevention of resource degradation and crime, law enforcement procedures, and circumvention of the development of larger issues of concern related to use are facilitated by following federal laws (e.g., NEPA, NHPA, ARPA), utilizing contacts with stakeholders (e.g., through NVUM, tribal correspondence, and FWFCC contacts), and through special efforts to develop an Action Plan to seek solutions (e.g., "Reshaping of the Ocala National Forest" workshop).
<b>PRINCIPLE 3: Indigenous peoples' rights</b>	
<b>Criterion 3.1 Indigenous peoples' control of forest management</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Since Tribal lands are not geographically in the vicinity of the NFF, the NFF staff consults with them on principle and because in any case it is the law. From a legal perspective, the NFF does not undertake any forest management planning on Tribal lands.
<b>Criterion 3.2 Maintenance of indigenous peoples' resources or tenure rights</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There have been indications, according to representatives of two Tribes, that consultation prior to archaeological survey work and forest management activities is improving, but often lacking. Tribes consulted viewed this as personnel dependent and that institutionally there are no stringent safeguards (see CAR 08).
<b>Compliance</b>	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate. However, consultations need improvement.
<b>Criterion 3.3 Protection of sites of special cultural, ecological, economic or religious significance to indigenous peoples</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	Tribal contacts expressed that certain areas on the NFF should be left alone, or that they are unnecessarily disturbed through NFF activities. They feel that developed recreational amenities do not belong in some areas. Another issue related to the lack security the NFF affords sites of significance. Tribes feel that if they themselves do not perform oversight, then it does not get done (see CAR 08).
<b>Compliance</b>	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate. However, site disturbances, whether by the NFF or those occurring due to lack security need improvement.
<b>Criterion 3.4 Compensation of indigenous peoples for the application of their traditional knowledge</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no strengths associated with this Criterion.
<b>Compliance</b>	Compliance relative to disclosures and sites of significance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate. Legislation which ensures confidentiality are the ARPA of 1979, NHPA of 1966 as amended through 1992, and the Forest Service Tribal Relations Enhancement Act. The NFF can exempt certain information under Exemption 3 of FOIA, such as specific site locations. Also, the same is true under the Florida "Sunshine Law," [s.119.07 (1) and 2.24(a) of Article I of the State Constitution]. No compensation to Tribes or commercialization of Tribal resources occurs on the NFF.

<b>PRINCIPLE 4: Community relations and workers rights</b>	
<b>Criterion 4.1 Employment, training, and other services for local communities</b>	
<b>Strengths</b>	Diverse activities engaged in by the USDA FS and NFF staff (e.g., timber sales administration, recreation management, wildlife management, archaeology) and contractors (e.g., timber harvesting, boundary line work, recreation concessionaire operations, habitat restoration) leads to above the norm quality and challenging work opportunities.
<b>Weaknesses</b>	NFF systems do not specifically address skill levels for contracted workers. NFF systems do not specifically address training needs and requirements for contracted workers which imply that contractor education skills and training needs may not be sufficient to their roles and responsibilities. While interviews with available contractor personnel indicated appropriate competency training, the NFF system lacks a mechanism for evaluating or ensuring contractor training and education. NFF systems do not specifically address training needs and requirements for contracted workers (see Major CAR M04)
<b>Compliance</b>	NFF employees are engaged in quality work experiences, are well compensated, and given ample opportunities for training and other services. Contractor training is not adequately evaluated and monitored.
<b>Criterion 4.2 Compliance with health and safety regulations</b>	
<b>Strengths</b>	OSHA requirements ensure that legislative mandates are in place to ensure that all applicable laws and/or regulations covering health and safety of employees and contractors are followed. NFF health and safety programs include a Health and Safety Handbook, a full-time NFF Safety Officer, and district-level designated safety officers and committees. Specific safety related training programs, monitoring, information sharing, and documentation by NFF staff, in particular the Safety Officer, is exceptional.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The Occupational Safety and Health Act of 1970, Executive Order 12196 and 29 CFR (Code of Federal Register) 1960 are the major laws and regulations requiring the USDA FS to furnish its employees and contractors with places and conditions of employment that are free from work-related safety and health concerns.
<b>Criterion 4.3 Workers' rights to organise and negotiate with employers</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Employees have access to a union which is called the National Federation of Federal Employees. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests. Documentation was also provided to SGS covering two types of grievance procedures available to employees that are backed by law.
<b>Criterion 4.4 Social impact evaluations and consultation</b>	
<b>Strengths</b>	NFF contribute to and work with many groups and organizations to protect and utilize appropriately forest and natural resources. The nature of these partnerships is delineated in the RLRMP. A prime example is the relationship with the Florida Park Service and the Florida Trail Association. Extensive assessment of sites having special cultural significance is documented in the EIS, RLRMP, and other supporting records. The existing EIS process includes extensive and well-documented consultation procedures. The NFF informs adjacent landowners and other affected parties of impending forest activities which might affect them in a variety of ways. The NEPA process and the mandates for public inputs provide an avenue for review of forest projects before any action is taken.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	NFF management planning and operations incorporate social impact evaluations in their projects and activities. Consultations are maintained with groups and agencies directly affected by management operations.
<b>Criterion 4.5 Resolution of grievances and settlement of compensation claims</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.

<b>Compliance</b>	Appropriate mechanisms, both informal (e.g., personal contact) and formal (e.g., letters), are used for resolving grievances by employees and others and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources or livelihoods of local citizens. Measures are taken to avoid such loss or damage. However, preventative and compensative actions by the staff are guided by laws and regulations.
<b>PRINCIPLE 5: Benefits from the forest</b>	
<b>Criterion 5.1 Economic viability taking full environmental, social, and operational costs into account</b>	
<b>Strengths</b>	The financial and institutional backing of the US Federal government lends significant security to the sustainability of management planning.
<b>Weaknesses</b>	Evidence indicates that the organization has significant and persistent administrative and management constraints that inhibit its ability to achieve key objectives in its management plan. In particular, the demonstrated inability to meet timber harvest objectives – particularly on the ANF and OscNF – is delaying progress toward management plan and recovery plan goals for endangered species recovery.
<b>Compliance</b>	While sustainable infrastructure is clearly provided for the organization, key management plan objectives are being consistently un-met, leading to serious shortfalls in meeting objectives (see Major CAR M05).
<b>Criterion 5.2 Optimal use and local processing of forest products</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Appropriate utilization and marketing standards were observed for production of both timber and non-timber resources. Harvest levels are relatively low.
<b>Criterion 5.3 Waste minimisation and avoidance of damage to forest resources</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting.
<b>Criterion 5.4 Forest management and the local economy</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The NFF is clearly a significant and positive contributor to its local communities and economies. A diverse and ambitious strategy for long-term production of a wide variety of products, services and values is outlined in its management plans.
<b>Criterion 5.5 Maintenance of the value of forest services and resources</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Conformance to this criterion is recorded in criterion 6.5
<b>Criterion 5.6 Harvest levels</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The allowable cut strategy for the NFF is clearly and appropriately detailed in the FEIS, and referenced in the RLRMP and the associated Record of Decision. Allowable cut levels are

	based on supportable analysis and conclusions. Actual cut levels are significantly below plan.
<b>PRINCIPLE 6: Environmental impact</b>	
<b>Criterion 6.1 Environmental impacts evaluation</b>	
<b>Strengths</b>	The environmental analysis documented in the RLRMP is unusual and notable in both depth and comprehensiveness.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The detailed analysis found in the RLRMP, section 2 – Forest-wide Desired Future Conditions, Goals and Objectives appropriately considers the wide range of natural resource values affected and potential environmental impacts of NFF land management.
<b>Criterion 6.2 Protection of rare, threatened and endangered species</b>	
<b>Strengths</b>	Specific protection strategies for RTE species and their associated communities occupy an unusual prominence in the key management systems of the NFF.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The audit team found a rich variety of specific management strategies designed to conserve and protect RTE species found on the forest. These included management activities at a variety of scales. Appropriate and detailed planning was fully implemented and consistently monitored for effectiveness.
<b>Criterion 6.3 Maintenance of ecological functions and values</b>	
<b>Strengths</b>	Key large scale management strategies for large Management Areas on the NFF are designed specifically to achieve restoration goals.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Major restoration and conservation goals are central to the ongoing activities on the NFF. Examples include the ambitious use of prescribed fire, replacement of “off-site” slash pine, and sand pine/scrub restoration.
<b>Criterion 6.4 Protection of representative samples of existing ecosystems</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The RLRMP, Section 2 Forestwide Desired Future Conditions, Goals and Objectives clearly delineate a strategy to identify and manage/protect examples of existing ecosystems and communities. Examples of active programs include scrub habitat and wet savannahs.
<b>Criterion 6.5 Protection against damage to soils, residual forest and water resources during operations</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The NFF has documented systems, fully implemented, to address protection of soils, forests, and water resources during operations. The RLRMP specifically cites the Florida Silviculture Best Management Practices (BMPs) as operating criteria. Compatible criteria are implemented on harvest operations through contract provisions. One instance was noted where harvest standards for sand pine on the required a variance from the standard guidance of the FL BMPs.
<b>Criterion 6.6 Chemical pest management</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The NFF has appropriate written procedures for the utilization of pest control chemical. Chemical use, in practice, is quite moderate in scope and largely focused on habitat restoration objectives and control of exotic plants. Use of two materials, currently under review for

	derogation, may create future conformance conflicts (see CAR 06).
<b>Criterion 6.7 Use and disposal of chemicals, containers, liquid and solid non-organic wastes</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Written procedures for use and disposal of chemicals, containers and wastes are adequate. No examples of spill response were available for review.
<b>Criterion 6.8 Use of biological control agents and genetically modified organisms</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Not applicable
<b>Criterion 6.9 The use of exotic species</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Not applicable
<b>Criterion 6.10 Forest conversion to plantations or non-forest land uses</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Not applicable
<b>PRINCIPLE 7: Management plan</b>	
<b>Criterion 7.1 Management plan requirements</b>	
<b>Strengths</b>	The extent and detail of the NFF management plan documentation is unusual.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The "Revised Land and Resource Management Plan for National Forests in Florida" (RLRMP) dated February 1999, as amended serves as the principal management planning document. This set of documents is publicly available at <a href="http://www.fs.fed.us/r8/florida/projects/">http://www.fs.fed.us/r8/florida/projects/</a> .
<b>Criterion 7.2 Management plan revision</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	The system has not addressed significant shortfalls in key management plan objectives over more than one-half of the plan (see CAR 07).
<b>Compliance</b>	An active system of adaptation and amendment of the RLRMP was demonstrated. Cycle includes Management review, Environmental Assessment (EA) and Plan Amendment. Seven Plan amendments are on record.
<b>Criterion 7.3 Training and supervision of forest workers</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	System for training and ensuring competency do not address contracted workers.
<b>Compliance</b>	Evidence indicates fully adequate training of NFF staff in the procedures and associated standards of the RLRMP. Provision for ensuring training of contract workers is not present.
<b>Criterion 7.4 Public availability of the management plan elements</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.

<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	All management plan documents are publicly available. This set of documents is available at <a href="http://www.fs.fed.us/r8/florida/projects/">http://www.fs.fed.us/r8/florida/projects/</a> .
<b>PRINCIPLE 8: Monitoring and evaluation</b>	
<b>Criterion 8.1 Frequency, intensity and consistency of monitoring</b>	
<b>Strengths</b>	Monitoring and reporting procedures, utilized routinely by the NFF as part of USDA-FS regulated programs, constitute an unusually broad and detailed level of information, utilized both internally for decision-making and externally for stakeholder consultation.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The NFF has a fully-developed and detailed set of monitoring and reporting procedures that fully meet the intent of this standard.
<b>Criterion 8.2 Research and data collection for monitoring</b>	
<b>Strengths</b>	The quality and detail of monitoring data is unusual for forest management organizations.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	All required items are fully addressed.
<b>Criterion 8.3 Chain of custody</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Not applicable
<b>Criterion 8.4 Incorporation of monitoring results into the management plan</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	The mechanisms in place to revise the management plan have not addressed the organization's inability to achieve key objectives in its management plan. See CAR 07.
<b>Compliance</b>	A mechanism is in place to utilize information from monitoring systems to review and adapt management procedures. Examples were reviewed that demonstrated the process by which monitoring data lead first to management review, then to environmental analysis and finally amendments to the RLRMP.
<b>Criterion 8.5 Publicly available summary of monitoring</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	All monitoring report documents are publicly available. This set of documents is available at <a href="http://www.fs.fed.us/r8/florida/projects/">http://www.fs.fed.us/r8/florida/projects/</a> .
<b>PRINCIPLE 9: High Conservation Value Forests</b>	
<b>Criterion 9.1 Evaluation to determine high conservation value attributes</b>	
<b>Strengths</b>	The NEPA regulated process of resource evaluation ensures a high standard of evaluation of the attributes of high conservation values.
<b>Weaknesses</b>	A specific evaluation to the FSC criteria for HCVF has not been undertaken.
<b>Compliance</b>	The resource evaluation conducted in the FEIS and implemented through the RLRMP constitutes an equivalent evaluation to that required for this standard. The evaluation presented in the RLRMP Section 2, Forestwide Desired Future Conditions, Goals and Objectives describes high conservation values, including those associated with endangered species, for large portions of the NFF.



<b>Criterion 9.2 Consultation process</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	This criterion is instruction to FSC-accredited certification bodies.
<b>Criterion 9.3 Measures to maintain and enhance high conservation value attributes</b>	
<b>Strengths</b>	Habitat conservation and restoration play a dominant role in NFF management strategies. Maintenance of these high conservation value attributes is embedded in routine standards of practice.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	The NFF organization displays strong conformance in identifying and adapting management to maintaining and restoring HDV's at large (RCW) and small (flatwoods salamander) scales.
<b>Criterion 9.4 Monitoring to assess effectiveness</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	See criteria 8.1 – 8.5
<b>PRINCIPLE 10: Plantations</b>	
<b>Criterion 10.1 Statement of objectives in the management plan</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	All use of plantation techniques by the NFF are specifically designed to address restoration and conservation objectives. Notable examples of this include conversion of "off-site" slash pine plantations to longleaf pine; and sand pine/scrub management. These objectives are clearly delineated in the RLRMP.
<b>Criterion 10.2 Plantation design and layout</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	As noted above, NFF planting programs are oriented towards restoration objectives. They also function as a relatively small scale. Design and layout criteria are appropriate in context.
<b>Criterion 10.3 Diversity in composition</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Management criteria for planted stands, as defined by the RLRMP, section 3, are oriented towards encouraging natural forest composition, structure and function. This is evidenced by vegetation management, prescribed fire, and stocking criteria.
<b>Criterion 10.4 Species selection</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Planting on the NFF is with longleaf, slash and sand pine. All species are identified as desirable for achieving habitat restoration goals
<b>Criterion 10.5 Restoration of natural forest</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.

<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	As noted above, NFF planting programs are oriented towards restoration objectives.
<b>Criterion 10.6 Impacts on soil and water</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	No negative impacts to soil and water were noted on or in association with NFF planning operations.
<b>Criterion 10.7 Pests and diseases</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	Consistent shortfalls in scheduled harvest treatments raise concerns regarding the requirement to maintain vigor and growth in existing plantations. Backlogs of unthinned slash and longleaf pine plantations could lead to unhealthy conditions over time (see CAR 09).
<b>Compliance</b>	Active protection of plantations from pests and disease, including effective use of prescribed fire, are conducted according to accepted local norms.
<b>Criterion 10.8 Monitoring of impacts, species testing and tenure rights</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	See criteria 8.1 – 8.5
<b>Criterion 10.9 Plantations established in areas converted from natural forests after November 1994</b>	
<b>Strengths</b>	There were no strengths associated with this Criterion.
<b>Weaknesses</b>	There were no weaknesses associated with this Criterion.
<b>Compliance</b>	Not applicable

**10. CERTIFICATION DECISION**

Not applicable

**11. MAINTENANCE OF CERTIFICATION**

Not applicable

**12. RECORD OF CORRECTIVE ACTION REQUESTS (CARS)**

CAR #	Indicator	CAR Detail					
		Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
01 minor	1.5.a	<b>Non-Conformance:</b>					
		The standard requires implementation of measures (such as boundary maintenance standards) to prevent illegal and/or unauthorized activities on the forest.  A boundary on the OscNF was observed which was effectively unmarked, not in conformance with FS criteria or with USFS boundary maintenance standards.					
		<b>Objective Evidence:</b>					
		Field Observations  Staff Interview  FSM 7150, 7151- Land Surveying, 7151.01- Authority, 7152- Land Line Location Program, 7152.6- Standards					
		<b>Close-out evidence:</b>					
M02 major	1.6	<b>Non-Conformance:</b>					
		The standard requires that forest managers demonstrate a long term commitment to adhere to the FSC Principals and Criteria.  The NFF organization has made no specific policy decision or management directive requiring conformance to the FSC standard.					
		<b>Objective Evidence:</b>					
		Revised Land and Resource Management Plan for NFF  Staff interview					
		<b>Close-out evidence:</b>					
03 minor	1.1.a	<b>Non-Conformance:</b>					
		The standard requires that management plans and operations comply with federal, state and other law and regulation.  Significant and consistent shortfalls in achieving key objectives of the management plan (e.g. timber harvest acres) are inhibiting the ability of the organization to meet its long-term obligations under the terms of the Red Cockaded Woodpecker recovery plan.					
		<b>Objective Evidence:</b>					
		2005 Annual Monitoring and Evaluation Report – NFF  Revised Land and Resource Management Plan for NFF					
		<b>Close-out evidence:</b>					
M04 major	4.1.d; 4.1.g	<b>Non-Conformance:</b>					

CAR #	Indicator	CAR Detail					
		<p>The standard requires that the organization provide and/or support training opportunities for workers, as well as ensure that workers have skills to perform assigned jobs.</p> <p>While both training and skill assessment are adequate for NFF employees, NFF systems do not specifically address skill levels or training opportunities for contracted workers.</p> <p><b>Objective Evidence:</b></p> <p>Staff Interview</p> <p><b>Close-out evidence:</b></p>					
M05 major	5.1.c 5.1.e	<b>Date Recorded&gt;</b>	16 FEB 07	<b>Due Date&gt;</b>	n/a	<b>Date Closed&gt;</b>	n/a
<b>Non-Conformance:</b>							
<p>The standard requires investment and reinvestment in forest management sufficient to fulfil management objectives and maintain and/or restore forest health and productivity. Also required is an economic return as described in the primary goals of the management plan.</p> <p>Evidence indicates that the organization has significant and persistent administrative and management constraints that inhibit its ability to achieve key goals in its management plan. In particular, the demonstrated inability to meet timber harvest objectives – particularly on the ANF and OscNF – is delaying progress toward management plan and recovery plan goals for endangered species recovery.</p>							
<b>Objective Evidence:</b>							
<p>2005 Annual Monitoring and Evaluation Report – NFF</p> <p>Staff Interviews</p> <p>Field Observations</p>							
<b>Close-out evidence:</b>							
06 minor	6.6.f	<b>Date Recorded&gt;</b>	16 FEB 07	<b>Due Date&gt;</b>	n/a	<b>Date Closed&gt;</b>	n/a
<b>Non-Conformance:</b>							
<p>The standard requires compliance with the FSC Policy paper “Chemical Pesticides in Certified Forests, Interpretation of the FSC Principals and Criteria”.</p> <p>The NFF makes use of two herbicide products – imazapyr and hexazinone – which are currently listed as prohibited. Derrogation applications are pending for use in the USA.</p>							
<b>Objective Evidence:</b>							
<p>Pesticide application records</p> <p>Staff interviews</p>							
<b>Close-out evidence:</b>							
07 minor	7.2.a; 8.4.b	<b>Date Recorded&gt;</b>	16 FEB 07	<b>Due Date&gt;</b>	n/a	<b>Date Closed&gt;</b>	n/a
<b>Non-Conformance:</b>							

CAR #	Indicator	CAR Detail					
		<p>The standard requires that the management plan shall be periodically reviewed to incorporate the results of monitoring as well as responding to changing environmental, social, and economic circumstances. It also requires that the management plan be revised as necessary to accommodate discrepancies between outcomes and expectations.</p> <p>Evidence indicates that the organization has significant and persistent administrative and management constraints that inhibit its ability to achieve key goals in its management plan. While demonstrated systems are in place to amend the management plan, the organization has not addressed the consequences of major shortfalls in its harvest schedules.</p> <p><b>Objective Evidence:</b></p> <p>Revised Land and Resource Management Plan for NFF 2005 Annual Monitoring Report</p> <p><b>Close-out evidence:</b></p>					
08 minor	3.2.a; 3.3.b	<b>Date Recorded&gt;</b>	16 FEB 07	<b>Due Date&gt;</b>	n/a	<b>Date Closed&gt;</b>	n/a
		<p><b>Non-Conformance:</b></p> <p>The standard requires that the organization identify, contact and invite input from indigenous groups regarding forest operations; additionally that forest managers jointly develop protection measures for sites of significance</p> <p>Consultation with identified indigenous groups indicate that while required consultation and collaboration is ongoing; it may not be consistent and effective.</p> <p><b>Objective Evidence:</b></p> <p>Stakeholder consultation</p> <p><b>Close-out evidence:</b></p>					
09 minor	10.7.a	<b>Date Recorded&gt;</b>	16 FEB 07	<b>Due Date&gt;</b>	n/a	<b>Date Closed&gt;</b>	n/a
		<p><b>Non-Conformance:</b></p> <p>The standard requires that plantation vigor be maintained to prevent outbreaks of pests and diseases. The NFF Land and Resource Management Plan has a schedule of cultural treatments whose goals include large-scale reduction of stocking levels by thinning pine stands and use of prescribed fire to improve and maintain forest vigor and health.</p> <p>Consistent sustained shortfalls in reaching plan objectives for harvest and other cultural treatments creates a significant risk to the organizations ability to maintain healthy and productive forest conditions as required.</p> <p><b>Objective Evidence:</b></p> <p>Revised Land and Resource Management Plan for NFF 2005 Annual Monitoring and Evaluation Report – NFF Field Observations Staff Interview</p> <p><b>Close-out evidence:</b></p>					
10	6.5.b	<b>Date Recorded&gt;</b>	16 FEB 07	<b>Due Date&gt;</b>	n/a	<b>Date Closed&gt;</b>	July 2, 2007

CAR #	Indicator	CAR Detail
minor		<p data-bbox="501 235 1481 286"><b>Non-Conformance:</b></p> <p data-bbox="501 286 1481 369">The standard requires a program to meet or exceed state BMPs for timber harvesting operations.</p> <p data-bbox="501 369 1481 443">Standards for harvesting Sand Pine stands on the Ocala NF – in particular, clear cutting to the water’s edge on some sites - may not be consistent with FL BMP standards</p> <p data-bbox="501 443 1481 488"><b>Objective Evidence:</b></p> <p data-bbox="501 488 1481 616">Revised Land and Resource Management Plan for NFF Staff interview Florida’s Silviculture Best Management Practices (FL DoF 2004)</p> <p data-bbox="501 616 1481 660"><b>Close-out evidence:</b></p> <p data-bbox="501 660 1481 828">Evidence provided during the review of draft reports supports modifying this finding. In particular, page 16 of the FL Silviculture BMPs includes language allowing specific exceptions to BMP for public land managers. Standards for Scrub Habitat, as detailed in the LRMP, are an appropriate implementation of this language.</p> <p data-bbox="501 828 1481 873"><b>This Non Conformity is closed.</b></p>

**13. RECORD OF OBSERVATIONS**

OBS #	Indicator	Observation Detail			
		01	1.5.a	Date Recorded>	16 FEB 07
		<b>Observation:</b>			
		Field observations indicate that some boundaries of the Navy Ordinance Area on the ONF were not clearly marked. While this internal boundary line may be the responsibility of the Navy, a potential hazard to public safety is indicated.			
		<b>Follow-up evidence:</b>			
		Date Recorded>		Date Closed>	
		<b>Observation:</b>			
		<b>Follow-up evidence:</b>			

## 14. RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS

### 15. RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS

Nr	Comment	Response
<b>Main Evaluation</b>		
1	NFF staff, in general, were not familiar with international agreements such as CITES or the Convention on Biological Diversity (CBO) (see Observation 2).	Key personnel, such as the Wildlife Biologists, were familiar with these agreements. However, several employees were unaware of these agreements
2	SGS interviewed NFF staff and staff of the Florida Wildlife and Fish Conservation Commission (FWFCC) to define their relationship with the NFF.	This interagency relationship served as an example of outside consultations whereby the FWFCC and the NFF achieve desired wildlife and fish population goals through appropriate habitat management relative to forest management activities.
3	Stakeholder contacts with several tribal representatives have portrayed a less than consistent effort on the part of the NFF in regard utilizing their inputs. Tribal concerns have stated that often they discover that activities have taken place without their being informed or consulted prior to the activity. This has occurred even prior to archaeological survey work. There have been indications, according to the tribes, that this is improving but the tribes view this as personnel dependent and that institutionally there are no stringent safeguards (see CAR 08).	The NFF identify and contact indigenous groups that have current legal and customary rights to use the land base. They stated, and provided documentation, showing that they have invited tribal concerns to provide their inputs on forestry operations and other activities (e.g., developed recreational sites) and have received tribal responses.
4	Some level of dissatisfaction exists amongst the tribes with the amount of protection and development that has occurred in areas of special significance to the tribe, which includes many water resources. In one case, a watercourse was negatively affected that had a burial area under water (See also 3.2.a). In another case, on Silver Glen Springs, the tribes asked for buffers of 350 feet around the area with no grills and restroom facilities, and this was not done. This request came after the tribes restored the area using volunteer help to repair damages from looting and erosion. In addition, the tribes feel that certain areas should be left alone, or that they are unnecessarily disturbed through NFF activities. They feel that developed recreational amenities do not belong in some areas. Another issue related to the security that the NFF affords sites of significance. The tribes feel that if they do not perform oversight, then it does not get done (see CAR 08).	As stated in the LRMP, and related to the SGS by NFF employees, it is the intention of the NFF to consult with tribes during decision-making processes related to forest management. This includes considering the effects of natural resource management decisions on the ability of tribes to exercise certain rights. Site-specific project analyses conducted by NFF address how project proposals may affect the ability of tribes to exercise their rights.
5	NFF has never dealt with traditional knowledge the tribes would like to protect and commercialize. As verified through NFF employee and stakeholder contacts the tribes have no legal claims to any fees.	There is no commercialization on the part of the NFF of indigenous intellectual property, traditional knowledge, and/or forest resources owned by the tribes. As a result, no written agreement exists.
6	Interviews with available contractor personnel indicated appropriate competency training; however, the NFF system lacks a mechanism for evaluating or ensuring contractor training and education (see CAR M04). NFF systems do not specifically address training needs and requirements (see CAR M04) for contracted workers.	Contractor training is not adequately evaluated and monitored.
7	NFF staff periodically meets with contractors before jobs are undertaken and then they confer during and after the job implementation. Interviews with logging contractors stated that the timber sale administrators visited the harvesting site as often as once a day.	All actions with regard to contractors are performed within the constraints of procedures and regulations under which the USDA FS must act. Both USDA FS employees and contractors are encouraged to participate and provide input into decision-making processes. Contractors, who are more locally involved, have access to their NFF technical representative to provide feedback.



---

Nr	Comment	Response
<b>Main Evaluation</b>		
8	A number of stakeholders replied to the stakeholder survey in regard to ATV use. Comments ranged from totally banning ORV to increasing their use.	NFF are in the process of designating roads and trails for specific uses. This will hopefully alleviate many of the complaints. Law enforcement needs to be enhanced, and this has happened already on the ONF.

**16. RECORD OF COMPLAINTS**

Nr	Detail		
	Complaint:	Date Recorded >	dd MMM yy
	None recorded		
	Objective evidence obtained:		
	Close-out information:	Date Closed >	dd MMM yy
	Complaint:	Date Recorded >	dd MMM yy
	Objective evidence obtained:		
	Close-out information:	Date Closed >	dd MMM yy
	Complaint	Date Recorded >	dd MMM yy
	Objective evidence obtained:		
	Close-out information:	Date Closed >	dd MMM yy

End of Public Summary



## FOREST MANAGEMENT CERTIFICATION REPORT

### SECTION B: EVALUATION & PRODUCTION INFORMATION, SAMPLING AND OBSERVATIONS

<b>Project Nr.:</b>	<b>600320</b>				
<b>Client:</b>	<b>National Forests of Florida</b>				
<b>Certificate Nr:</b>	<b>n/a</b>				
<b>Scope:</b>	Forest Management of forests & plantations in the state of Florida USA for the production of softwood/hardwood timber and other resource values: Apalachicola National Forest Osceola National Forest Ocala National Forest				
<b>Change of Scope</b>	<table border="1"><tr><td><b>New Scope</b></td><td>n/a</td></tr><tr><td><b>Evaluation</b></td><td>n/a</td></tr></table>	<b>New Scope</b>	n/a	<b>Evaluation</b>	n/a
<b>New Scope</b>	n/a				
<b>Evaluation</b>	n/a				
<b>SLIMF Type</b>	n/a				
<b>Justification</b>	n/a				
<b>Company Contact Person:</b>	Carl Petrick, Ecosystem Staff Officer				
<b>Address:</b>	325 John Knox Road, Tallahassee, Florida 32303				
<b>Tel:</b>	850-523-8509				
<b>Fax</b>					
<b>Email:</b>	cpetrick@fs.fed.us				

## 1. BASIC EVALUATION INFORMATION

MAIN EVALUATION			
<b>Evaluation Dates:</b>	February 12 – 16, 2007		
<b>Team Leader:</b>	Daniel J. Simonds		
<b>Assistant Assessor 1:</b>	Joseph McGlincy		
<b>Assistant Assessor 2</b>	Stephen Grado		
<b>Assistant Assessor 2</b>	Charles Levesque		
<b>Assistant Assessor 2</b>	Michael Dooner		
<b>Technical Expert 1</b>	David Govatski		
<b>Technical Expert 2</b>	Rick Larkin		
<b>Peer Reviewer 1:</b>	Phil Guillery		
<b>Peer Reviewer 2</b>	Mila Alvarez		
<b>Peer Reviewer 3</b>	Tom Charles		
<b>Report submitted by:</b>	Daniel J. Simonds	<b>Date:</b>	8/31/07
<b>Report approved by:</b>		<b>Date:</b>	
<b>Certification approved by:</b>		<b>Date:</b>	
<b>Database logged by:</b>		<b>Date:</b>	

---

## 2. ISSUES RAISED BY PEER REVIEWERS

- A. One reviewer recommended considering CAR 04 minor rather than major, citing lack of evidence of problems or issues related to inadequate logger training. The audit team concurs that no pressing problems were evident, but consider this a major non-conformity because of the complete lack of programs or procedures by the NFF to address the question of logger training or competency.
- B. Two reviewers indicated that it is not clear why CAR 03 is considered a minor rather than a major CAR. The audit team determined that this CAR should be rated as a minor primarily because evidence was clear that the NFF are meeting short-term objectives of the RCW recovery plan. Language in the CAR is modified to clarify this point.
- C. One reviewer recommended that CAR 09 be rated major, citing the importance of forest health in the US South. The audit team felt that this CAR was closely related to, but somewhat subordinate to the findings recorded in CAR 05. Lack of evidence of pressing forest health issues lead us to rating this finding as a minor CAR.
- D. One reviewer questioned the fact that the audit team members were not named in the Public Summary Report. This practice follows the standard protocols of the Qualifor Programme. Audit team members are named in the main "Observations" section of the report.
- E. Two reviewers noted some lack of detail in the evidence trail recorded in parts of Principal 6. The audit team acknowledges that some ISO/SFI trained members of the team were accustomed to reporting styles less detailed than is common in FSC assessment reports. We feel that audit findings are sufficiently supported.
- F. Some questions were raised about the degree of stakeholder consultation. The audit team was also somewhat disappointed in the response received to our multiple attempts to secure stakeholder input. We concluded that our input was, nonetheless, representative. It has also been suggested that low interest in this project reflects well on the public image of the NFF.
- G. A comment was made on the extensive references made to NFF documents and procedures in the audit report, and the desirability of making this available to members of the public interested in reviewing this report. The audit team notes that NFF's extensive documentation is readily available via its website. This web address is noted prominently in this report.
- H. One reviewer noted that the response to Indicator 2.2.a lacked reference to consideration of carrying capacity in the management of recreational use of the forest. The audit team has extensive evidence of the active manner in which NFF management addresses this question. A clarifying note was added to this indicator.
- I. One reviewer noted several instances where the audit team failed to apply quantitative assessment to questions posed by Principals 5 concerning the economic impacts of management decisions on local communities. The audit team acknowledges the relevance of this question, but feels that sufficient evidence was recorded to support the conformance findings in question.

**3. SAMPLING METHODOLOGY, RATIONALE AND TIME ALLOCATION**

	Mandays	Sampling Methodology and Rationale
<b>Main Evaluation</b>	41	<p>Pre-audit conducted on-site with 2 auditors</p> <p>Stakeholder Review conducted before, during and after Main Audit with 2 auditors – in conjunction with “additional considerations” process unique to this project.</p> <p>Main Audit conducted with team of 6 auditors for 5 days on-site. Field visits organized to sample a full extent of geography and activity types on all three major management units (NF’s) as well as all Ranger Districts.</p> <p>All assessment carried out in conjunction with a concurrent SFI assessment.</p> <p>For details see a) Assessment Itinerary b) Audit sampling plan</p>

The following FMUs were included in the sample used for the evaluation.

Name of FMU or Group Member	Main Evaluation	Surveillance 01	Surveillance 02	Surveillance 03	Surveillance 04
Apalachicola National Forest	+	n/a	n/a	n/a	n/a
Osceola National Forest	+	n/a	n/a	n/a	n/a
Ocala National Forest	+	n/a	n/a	n/a	n/a

The field sites visited during the evaluation were as follows:

See attached Audit Trail notes.

---

**4. TRACKING, TRACING AND IDENTIFICATION OF CERTIFIED PRODUCTS**

Not applicable

**5. USE OF PESTICIDES**

Commercial Name of Pesticide	Active Ingredient	Reason for use
Velpar	Hexazinone	Vegetation control
Arsenal (& others)	Imazapyr	Vegetation control
Roundup (& others)	Glyphosate	Exotic species control

**6. LIST OF ATTACHMENTS**

The following documents are attached to this section (B) of the report and form part of the complete report.

Document	Attachment Confirmed				
	MA/RA	Surv. 01	Surv. 02	Surv. 03	Surv. 04
AD 20: Evaluation Itinerary	yes	n/a	n/a	n/a	n/a
AD 21: Attendance Record	yes	n/a	n/a	n/a	n/a
AD 26: CARs	no	n/a	n/a	n/a	n/a
List of Stakeholders	yes	n/a	n/a	n/a	n/a



## 7. OBSERVATIONS

<b>PRINCIPLE 1: COMPLIANCE WITH LAWS AND FSC PRINCIPLES:</b>	
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	
<b>Criterion 1.1: Forest management shall respect all national and local laws and administrative requirements</b>	
<b>Indicator 1.1.a</b>	<i>For example, permits and/or authorization are obtained when required.</i>
Forest (see Glossary) management plans and operations comply with federal, state, county, municipal, and tribal laws, case law, and regulations.	
	<p>Laws and regulations are fully codified in USDA Forest Service Manuals (FSM) and Forest Service Handbooks (FSH), together known as the “Forest Service Directives Systems.” Nearly all management activities and control of internal programs on National Forest system lands are controlled by these USDA Forest Service Directives. The FSM contains legal authorities, goals, objectives, policies, responsibilities, instructions, and the necessary guidance to plan and execute assigned programs and activities. Examples from the FSM include: laws, regulations and orders related to timber management, watershed and air management, and forest pest management. FSHs are directives that provide instructions and guidance on how to proceed with a specialized phrase of a program or activity. Handbooks are either a part of the manual or they incorporate external directives.</p> <p>It is the mandate and intent of the NFF to comply with laws at all governmental levels. The NFF 1999 Revised Land and Resource Management Plan (RLRMP) for <i>National Forests of Florida</i> was prepared in accordance with the National Forest Management Act (NFMA), National Environmental Policy Act (NEPA), and all associated laws and regulations, as are subsequent project-level activities. This Forest Plan is the preferred alternative for managing the land and resources that are analyzed and described in the Final Environmental Impact Statement. The USDA FS is governed by a number of Federal laws relative to tribal concerns. Key legislation includes the National Historic Preservation Act (NHPA) and the Archaeological Resources Protection Act (ARPA). Operations on the NFF were observed to be in substantial compliance with law and regulations.</p> <p>Significant and consistent shortfalls in meeting key management plan objectives (see 5.1.c) raise concerns regarding the ability of the NFF to fully comply with habitat requirements set in the ESA recovery plan for Red-Cockaded Woodpecker (See CAR 03).</p>
<b>Indicator 1.1.b</b>	
Forestry operations meet or exceed the current state forest practice regulations, best management practices for forestry, and other protective measures for water quality (see Glossary) that exist within the state(s) or other appropriate jurisdiction(s) in which the operations occur.	
	The RLRMP states that all impacts from harvesting and reforestation are managed by using forest wide standards and guidelines which include Florida's Silvicultural Best Management Practices (BMPs). As an example, these control measures include careful planning of location and design of harvesting activities and limiting ground disturbance in and near lakes, springs, streams, wetlands, and other sensitive areas. Observations of field operations found that forest activities were in substantial compliance with BMPs.
<b>Indicator 1.1.c</b>	
Forest owners or managers share public information, provide open records, and conduct procedures for public participation as required by law.	
	The NFF, as a federal entity, shares public information and follows regulations relating to the public input process. The RLRMP details the public consultations involved with developing the Forest Plan.

<b>DoD/DoE Indicator 1.1.1</b>	
Disputes and legal challenges over land management and agency actions, including administration and judicial appeals filed by stakeholders outside the agency, are identified. Information on the processes for resolving disputes is readily available to interested stakeholders.	
<b>Main Audit</b>	The NFF has had lawsuits and appeals in the past that are identifiable and an accessible part of the public record. Large-scale use-rights disputes can arise on two levels, those at the RLRMP level (e.g., the Forest Plan can be appealed) and those at the project level. The team was informed by NFF's Forest Planner in the Supervisor's Office that there were no ongoing appeals in these areas. Information on the processes for resolving such disputes is readily available via the Code of Forest Regulations (36 CFR 215).
<b>Criterion 1.2: All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid</b>	
<b>Indicator 1.2.a</b>	<i>For example:</i>
Taxes on forestland and timber, and other fees related to forest management, are paid in a timely manner and in accordance with federal, state, county, municipal and tribal laws.	<i>Inquiries at local clerk's office verify that property taxes have been paid. Title to property is not jeopardized by delinquent taxes or loans</i>
	The USDA FS is a public, tax-exempt organization; however, it is required to make payments to local communities under Public Law 97-258 (Payments in Lieu of Taxes (PILT)) to offset the reduction in local property tax receipts due to non-taxable federal lands in the local jurisdiction. Records of compliance to "Secure Rural Schools and Community Self-Determination Act of 2000, P.L. 106-393," which determines payments in lieu of taxes protocols are included in annual monitoring report. This was documented in the "2005 Annual Monitoring and Evaluation Report National Forests In Florida."
<b>Criterion 1.3: In signatory countries, the provisions of all the binding international agreements such as CITES, ILO conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b>	
<b>Indicator 1.3.a</b>	
Forest owners or managers comply with treaties ratified by the U.S. Senate, including treaties with Native American tribes (note, see Appendix D for treaties which have been ratified and to which the US is a party as well as the following link: <a href="http://fletcher.tufts.edu/multilaterals.html">http://fletcher.tufts.edu/multilaterals.html</a> ).	
<b>Main Audit</b>	As a federal entity the USDA FS is mandated to comply with treaties ratified by the U.S. Senate. Extensive and detailed records of treaty status and obligations related to native communities was made available. NFF staff stated they were not aware of most international agreements that would affect NFF lands. The Migratory Bird Treaty Act is a more familiar international agreement that the USDA FS follows. However, NFF staff, in general, were not familiar with international agreements such as CITES or the Convention on Biological Diversity (CBO).
<b>Criterion 1.4: Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case-by-case basis, by the certifiers and the involved or affected parties</b>	
<b>Indicator 1.4.a</b>	
Where discrepancies between laws and FSC Principles and Criteria occur, they are referred to the appropriate FSC body.	
<b>Main Audit</b>	There are no known conflicts between the laws and regulations directing NFF operations and the FSC Principles and Criteria.
<b>Criterion 1.5: Forest management areas should be protected from illegal harvesting, settlement and other unauthorised activities</b>	
<b>Indicator 1.5.a</b>	<i>For example, by: painting and posting boundary notices, using gates, and making periodic inspections, etc.</i>
Forest owners and managers implement measures to	

prevent illegal or unauthorized activities in the forest management area (see Glossary).	
<b>Main Audit</b>	The NFF uses gates on clay pits for reasons of safety and to prevent the spread of invasive plants which tend to invade disturbed areas. In addition, they meet their stated target for boundary line establishment at 40 miles per year. However, interviews with staff indicate this target is much lower than it should be. Evidence of regular boundary maintenance was reviewed in the field. On some sites, lines were not maintained, and not marked (see CAR 01). On the OscNF, in the Pinhook area along the state forest boundary, there were places that were only partly maintained along its extent. On the ONF in the buffer zone outside the naval ordinance area there were areas where posing was non-existent. While this may be the responsibility of the U.S. Navy, it clearly represents a potential hazard to public safety. (see Observation 01). Law enforcement presence has been enhanced, particularly on the ONF, where issues related to unauthorized activities such as ATV use is prevalent.
<b>Criterion 1.6: Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria</b>	
<i>Applicability note to Criterion 1.6.: Assessment of this criterion is guided by both FSC Policy and Guidelines: Partial Certification for Large Ownerships (BM19.24). May 2000, (<a href="http://www.fsc.org/en/whats_new/documents/Docs_cent/2">http://www.fsc.org/en/whats_new/documents/Docs_cent/2</a>) and the FSC Guidelines for Certification FSC STD 20-001.</i>	
<b>Indicator 1.6.a</b>	
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.	
<b>Main Audit</b>	The USDA FS has made no specific policy decision or management directive requiring conformance to the FSC standard. As a result, NFF has not developed a written commitment to the FSC standards (see Major CAR M02).
<b>Indicator 1.6.b</b>	
Forest owners or managers document the reasons for seeking partial certification	
<b>Main Audit</b>	The NFF are not seeking certification, partial or in total.
<b>PRINCIPLE 2: TENURE AND RIGHTS RESPONSIBILITIES:</b>	
Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.	
<b>Criterion 2.1: Forest management shall respect all national and local laws and administrative requirements</b>	
<b>Indicator 2.1.a</b>	
Forest owners or managers make available information on 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.	
<i>For example, long-term leases, timber rights, or other assured rights of ownership, management, or use.</i>	
<b>Main Audit</b>	The NFF have thorough documentation on their legal and customary rights associated with the forest. SGS was provided evidence to this effect. In the Supervisor’s Office, the Land Surveyor and Realty Specialist pulled an example of a deed (Deed 5420, Tract 0-956, with the grantor’s name referenced). For the past 20 years, the NFF have developed a “Land Description Verification Form” which contains the title and warranty deed reference. All deeds are kept in the Supervisor’s Office, Tallahassee, Florida in the Status Book (Atlas) and are color coded by acquisition status and a track reference for each acquired parcel. A number of parcels in the NFF were Public Domain lands and do not have a reference. These lands were never privately held.
<b>Criterion 2.2: Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</b>	
For definition of legal or customary tenure see glossary.	
<b>Indicator 2.2.a</b>	
Where customary and lawful uses of the forest are consistent with the conservation of the forest resource	

and the objectives stated in the management plan, forest owners or managers permit their continuance.	
<b>Main Audit</b>	<p>Most activities on the NFF are consistent with the conservation of forest and other natural resources and the Forest Plan objectives. These activities include sightseeing, hunting, fishing, hiking, biking, horseback riding, and camping. While Off Highway Vehicle (OHV) use has occurred in the past, new USDA FS rules mandate that they occur only on designated routes and areas to be identified on a motor vehicle use map. The USDA FS has taken this action primarily due to concerns with OHV use and the destruction of habitat. Conflicts with other recreationists have also occurred. Currently, all roads and trails are being signed and designated for OHV and other vehicle use. It is anticipated that use on these areas will reduce unauthorized use on the forests, thus lessening the damage to the resource. The team witnessed the posting and signage for designated vehicular use. The NFF staff discussed the possibility of requiring permits for OHV use on the forest.</p> <p>Issues of carrying capacity, and the conflicts presented by recreational uses of the forest and resource protection feature prominently in NFF management plans and activities. The NFF have also put up temporary closure signage, witnessed in the field, to prevent entry into an area via OHVs. This action was viewed at a pond and the surrounding habitat on the Ocala NF.</p>
<b>Indicator 2.2.b</b>	<i>For example, site preparation, harvesting, onsite processing.</i>
<b>Main Audit</b>	<p>On ownerships, where customary use rights and traditional and cultural areas/sites exist, forest owners or managers consult with concerned groups in the management planning process and take precautions in the implementation of management operations in those areas.</p> <p>Prior to implementing forest management practices, the NFF consult with tribal concerns (e.g., Muscogee (Creek) Nation of Oklahoma, Poarch Tribe of Alabama) on relevant cultural areas/sites. Clear and dated documentation provided to the team of tribal contacts confirmed this.</p> <p>Also, through public stakeholder input mandated in the NEPA process there are multiple opportunities for stakeholders and other interested parties to provide input on proposed NFF management activities. All timber management activities are packaged as a project and have to comply with NEPA, which mandates public input. In the National Visitor Use Monitoring (NVUM) studies, recreationists have opportunities to voice their opinions on issues related to recreational opportunities on the forest. Recreational stakeholder inputs are gathered every five years and used to adjust forest management strategies. A Web site for the 2000 study, published in 2001, was given to the team (<a href="http://www.fs.fed.us/recreationb/programs/nvum/reports/year1/R8_Florida_final.htm">http://www.fs.fed.us/recreationb/programs/nvum/reports/year1/R8_Florida_final.htm</a>). A total of 889 contacts were made during 2000. The 2006 study has been completed but has not yet been published. Also, as stated in the RLRMP provided to the team, the NFF has, as one of its objectives, a required effort to consult with various groups and agencies. It is an objective of the Forest Plan to implement surveys to gauge public satisfaction with NFF programs. An example of outside consultations take places with the Florida Wildlife and Fish Conservation Commission (FWFCC) on achieving desired wildlife and fish population goals through appropriate habitat management relative to forest management activities. The team interviewed NFF staff and staff of the state agency to confirm this relationship. The agency also has an office presence in the District Ranger's Office on the OscNF. Documentation was provided detailing the types of activities engaged in and future plans between the two agencies.</p>
<p><b>Criterion 2.3: Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified</b></p>	
<b>Indicator 2.3.a</b>	<p>Forest owners or managers maintain relations with community (see Glossary) stakeholders to identify disputes in their early stages. If disputes arise, forest owners or managers initially attempt to resolve them through open communication, negotiation, and/or mediation. If negotiation fails, federal, state, local, and/or tribal laws are employed to resolve land-tenure (see Glossary) claims.</p>
<b>Main Audit</b>	<p>The NFF regularly communicates with various special interest groups and other stakeholders (e.g., public agencies, private landowners), primarily through the NEPA process to promote and enhance use rights. Other</p>

	<p>contacts include recreationists through the periodic NVUM studies. These contacts serve to prevent any points of contention from escalating into full blown disputes.</p> <p>When other issues develop (e.g., adjacent landowner boundary line disputes, timber theft, dumping) NFF staff, and when necessary law enforcement staff, attempt to resolve the matter through negotiated settlement. Most violations concern OHV use and trash and debris dumping. In Florida, commercial dumping is a felony. Most of the trash viewed in the forest appeared to be from groups of trespassers or related to households. NFF’s law enforcement officers use their discretion, and may give verbal warning for first time offenders. However law enforcement officers, or the Forest Protection Officers (FPOs), can write a violation notice and cite violators to court. FPOs are trained to issue violation notices (Form FS-5300-4, Violation Notice); however, they do not become involved in incidents related to violence, alcohol, or drugs. FPOs are required, when feasible, to attempt to gain voluntary compliance by informing and educating persons who appear to be in violation of Federal rules and regulations. The NFF also has a patrol agreement with county sheriff’s offices and local police departments. When serious issues of any kind remain unresolved, the staff will eventually direct the matter to the Office of the General Counsel, who will provide legal opinions and services related to the problem. On fish and wildlife issues, the NFF works with FW FCC law enforcement officers.</p> <p>One exceptional example of resolving disputes and issues of concern involved the ONF. The ONF has a long history of serving the public and being an asset to local communities and other visitors. To provide for long-term quality of the land base to sustain current and future uses the ONF needed to establish a secure and safe environment for visitors and workers from crime and resource damage and degradation. As a result, 13 members of the USDA FS participated in a workshop titled “Reshaping of the Ocala National Forest” on June 19-22, 2006 in Gainesville, Florida. The disciplines represented included law enforcement, public affairs, recreation, archaeology, and forestry. Recreation experts from the University of Florida provided facilitation and guidance to the group during the plan development. The workshop was focused on the general themes of information gathering, stakeholder workshops, and solution development leading to an Action Plan. Based on staff discussions and synthesis of stakeholder interviews, four key issues were identified: reduce dumping; reduce illegal activities related to ONF squatters (e.g., methamphetamine labs and violent crimes); reduce motorized vehicle damage; and improve safety of visitors, employees, and other forest staff. An Action Plan was agreed upon which involved law enforcement, management, and communications. Under each category a set of goals and accomplishments were delineated and milestones, funding, and responsibilities were to be used to track accomplishments. Funding for the immediate actions was included in the FY 2007 program. From this, a presentation was developed for the Regional Office and other partners. Some of the major impacts from the workshop were: 1) an increase in USDA FS law enforcement officers from two to five with a future goal of eight, 2) converted one of five law enforcement officers to a K9 unit with a goal of two of the final eight being K9 units, 3) adjusted down the length of stay policy for campgrounds to deter long-term residents, 4) increased funding to Marion and Lake County Sheriffs under cooperative agreements and explore a similar agreement with Putnam County, 5) strengthened agreement with FW FCC to allow those officers to enforce more forest rules, and 6) identified community leaders who are leading change as their areas are returned to lawfulness. A set of other actions are in progress. Full documentation of the above was provided to SGS by the NFF.</p>
<b>Indicator 2.3.b</b>	
Forest owners or managers provide information regarding unresolved and ongoing disputes over tenure and use rights to the certifying body.	
<b>Main Audit</b>	<p>The Realty Specialist in the Supervisor’s Office provided information on NFF boundary disputes. The NFF has fewer in number relative to other USDA FS units due to the fairly contiguous nature of the three individual forests. Issues are dealt with in two ways. The first is to utilize existing legislation such as the Small Tracts Act criteria which delineates the mechanism to resolve title claim disputes. This Act permits the USDA FS to survey the land in question, at the landowner’s expense unless the USDA FS does the work. The NFF can then sell up to 10 acres of the property being used by the landowner to that landowner. The second method is to engage NFF law enforcement, particularly in cases of encroachment.</p> <p>Larger use-rights disputes arise on two levels, one at the RLRMP level and one at the project level. The Forest Plan can be appealed. The team was informed by the Forest Planner in the Supervisor’s Office that there are no ongoing appeals in these areas.</p>

**PRINCIPLE 3: INDIGENOUS PEOPLES' RIGHTS:**

The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognised and respected.

*Applicability Note: The terms "tribes", "tribal" or "American Indian groups" in indicators under Principle 3 include all groups and individual indigenous people in the US, who may be organized in recognized or unrecognized tribes, bands, nations, native corporations, or other native groups.*

**Criterion 3.1: Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.**

**Indicator 3.1.a**

Forest management planning on tribal lands includes a process for input by tribal members in accordance with their laws and customs.

*For example:*

*Documentation in the form of public notices, correspondence, or meeting minutes is provided. Management plans reflect knowledge and consideration of tribal interests and concerns.*

**Main Audit**

The tribes do not have any stated land claims since they feel the land has always been theirs, and always will be. Since the tribal lands are not geographically in the vicinity of the NFF, the NFF staff consults with them on principle and because in any case it is the law. From a legal perspective, the NFF does not undertake any forest management planning on tribal lands; however, there are tribal resources (e.g., sites of cultural significance) on the NFF (See 3.3.a).

**Indicator 3.1.b**

Forest management on tribal lands takes place only after securing the informed consent of tribes and individuals (such as allottees; see Glossary) whose forest is being considered for management.

**Main Audit**

Again, while the NFF does not undertake any forest management planning on tribal lands, there are tribal resources (e.g., sites of cultural significance) on the NFF. Thus through the NEPA process and NHPA, the NFF go forward on all projects according to the law. Tribes are provided with information on projects and given 30 days to reply. If they communicate back and don't like what is being proposed the NFF has 30-45 days to let them know why specific actions are being taken. Documentation provided to SGS has confirmed communications with several tribes, some who have expressed no interest in the NFF and others who were concerned with specific projects about to be undertaken and asked to be notified when issues arise. However, some tribal representatives indicated that they have not always been informed of activities on the NFF.

**Indicator 3.1.c**

When requested to do so by the tribal landowner(s), forest owners or managers utilize tribal experience, knowledge, practices, and insights in forest management planning and operations on tribal lands.

**Main Audit**

The NFF does not undertake any forest management planning on tribal lands. However, due to the presence of tribal resources (e.g., site of cultural significance) on the NFF the staff has made use of tribal knowledge. For example, the ONF has maps on historic Seminole areas that were created, in part, with tribal inputs. This information is useful when planning and undertaking forest operations or recreational activities.

**Criterion 3.2: Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples**

**Indicator 3.2.a**

Forest owners or managers identify and contact indigenous groups that have current legal or customary rights to use the management area, and invite their input on the forestry operations that affect their resources and/or their resource rights.

**Main Audit**

The NFF identify and contact indigenous groups that have current legal and customary rights to use the land base. They stated, and provided documentation, showing that they have invited tribal concerns to provide their inputs on forestry operations and other activities (e.g., developed recreational sites) and have received tribal responses. However, stakeholder contacts have portrayed a less than consistent effort in this regard. Tribal concerns have

	stated that often they discover that activities have taken place without their being informed or consulted prior to the activity. This has occurred even prior to archaeological survey work. There have been indications, according to the tribes, that this is improving but the tribes view this as personnel dependent and that institutionally there are no stringent safeguards (see CAR 08).
<b>Indicator 3.2.b</b>	
On lands adjacent to tribal lands or falling within watersheds that affect tribal lands, safeguards are implemented to ensure that forest management does not adversely affect tribal resources.	
<b>Main Audit</b>	The NFF does not have any land adjacent to tribal lands or lands falling within watersheds affecting tribal lands.
<b>Criterion 3.3:</b>	<b>Sites of special cultural, ecological, economic or religious significance to indigenous peoples [and other sections of the community] shall be clearly identified in co-operation with such peoples, and recognised and protected by forest managers.</b>
<b>Indicator 3.3.a</b>	<i>For example:</i>
Forest owners or managers request the participation of tribal representatives in culturally appropriate identification of sites of current or traditional significance within the property proposed for certification.	<i>Ceremonial, burial, or village sites Areas used for hunting, fishing, or trapping;; Current gathering areas for culturally important or ceremonial materials, such as basket materials, medicinal plants, or plant materials used in dances; Current gathering areas for subsistence uses, such as mushrooms, berries, acorns, etc; Unique historical, or archeological sites.</i>
<b>Main Audit</b>	The USDA FS is governed by a number of federal laws relative to tribal concerns. Key legislation includes the National Historic Preservation Act (NHPA) and the Archaeological Resources Protection Act (ARPA). Operations on the NFF were observed to be in full compliance with laws and regulations. While the NFF does not undertake any forest management planning on tribal lands, there are tribal resources (e.g., site of cultural significance) on the NFF and the NFF staff communicates and consults with them on principle and because, in any case, it is the law. Also, NFF management tries to utilize a number of venues for communicating with and receiving inputs from tribal interests. In general, tribal representatives do not come to public meetings as they view themselves as a governmental entity and feel they should be addressed so. The NFF corresponds via letters and documentation with the tribes. Evidence of this was presented to SGS. Other methods are also used. The NFF staff recently made a presentation on land exchanges to several tribal concerns. The Forest Supervisor has met with the tribes on occasion.
<b>Indicator 3.3.b</b>	<i>For example:</i>
Forest owners or managers, and tribal representatives jointly develop measures to protect or enhance sites of special significance.	<ul style="list-style-type: none"> <li>• <i>The management plan outlines appropriate management of such sites and references appropriate legislation (e.g., Native American Graves Protection and Repatriation Act).</i></li> <li>• <i>Interviews and/or field inspections verify appropriate management and protection of such sites.</i></li> <li>• <i>Evidence exists of consultation with appropriate tribal authorities.</i></li> </ul>
<b>Main Audit</b>	As stated in the RLRMP, and related to the auditor by NFF employees, it is the intention of the NFF to consult with tribes during decision-making processes related to forest management. This includes considering the effects of natural resource management decisions on the ability of tribes to exercise certain rights. Site-specific project analyses conducted by NFF address how project proposals may affect the ability of tribes to exercise hunting, fishing or gathering rights. However, some level of dissatisfaction exists amongst the tribes with the amount of protection and development that has occurred in areas of special significance to the tribe, which includes many water resources. In one case, a watercourse was negatively affected that had a burial area under water (See also 3.2.a). In another case, on Silver Glen Springs, the tribes asked for buffers of 350 feet around the area with no grills and restroom facilities, and this was not done. This request came after the tribes restored the area using volunteer help to repair damages from looting and erosion. In addition, the tribes feel that certain areas should be left alone, or that they are unnecessarily disturbed through NFF activities. They feel that developed recreational amenities do not belong in some areas. Another issue related to the security that the NFF affords sites of significance. The tribes feel that if they do not perform oversight, then it does not get done (see CAR 08).
<b>Indicator 3.3.c</b>	
Confidentiality of disclosure is maintained in keeping	

with custom, laws, and the requirements of tribal representatives.	
<b>Main Audit</b>	<p>For federal agencies, such as the USDA FS, legislation dictates much of what is done to protect tribal resources. For example, the National Historic Preservation Act (NHPA) of 1966, as amended in 1992, further directed federal agencies such as the USDA FS to establish preservation programs in line with their goals and objectives for the forest and gauge the effects of their program activities on historic and cultural areas of significance.</p> <p>The confidentiality of archaeological, historical, and cultural sites are protected, in part. Disclosure of these areas is exempt under Exemption 3 of the Freedom of Information Act (FOIA). The NFF does not disclose or identify cultural resources in the field so as to not draw attention to them.</p>
<p><b>Criterion 3.4: Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</b></p>	
<b>Indicator 3.4.a</b>	
Forest owners or managers respect the confidentiality of tribal knowledge and assist in the protection of tribal intellectual property rights.	
<b>Main Audit</b>	<p>Legislation which ensures confidentiality consists of the Archaeological Resource Protection Act (ARPA) of 1979 and the National Historic Preservation Act of 1966 as amended through 1992. For example, Section 304 of the NHPA allows agencies to withhold information regarding an undertaking or its effects if it determines that such information would cause a significant invasion of privacy, risk harm to the resource or cultural site, or impede the use of a traditional religious site by its practitioners (<a href="http://www.dot.state.fl.us/emo/NA%20Website%20Files/Issues.htm">http://www.dot.state.fl.us/emo/NA%20Website%20Files/Issues.htm</a>). The NFF respects the confidentiality of tribal knowledge and, whether it is used in management decisions or not, does not disclose it. The NFF can exempt certain information under Exemption 3 of FOIA, such as specific site locations. Cooperation among the Tribes and the NFF on projects of mutual interest is the expressed, and mandated, goal of both parties.</p> <p>In addition, under the Florida Sunshine Laws, compartmentalization takes place, thus certain information is not officially in state files so it is not subject exposure. Legislation enacted by the Florida state legislature in January 2002 exempts the locations of archaeological sites in Florida from the provisions of what is commonly referred to as the "Sunshine Law," (s.119.07 (1) and 2.24(a) of Article I of the State Constitution). The law allows agencies to limit the distribution of location information on sites vulnerable to looting or vandalism, in particular, prehistoric archaeological sites (Chapter 267.135 Location of Archaeological Sites) (<a href="http://www.dot.state.fl.us/emo/NA%20Website%20Files/Issues.htm">http://www.dot.state.fl.us/emo/NA%20Website%20Files/Issues.htm</a>).</p>
<b>Indicator 3.4.b</b>	
Where indigenous intellectual property is commercially utilized, a written agreement with individuals and/or tribes is reached prior to commercialization that states how they will be compensated for the use of their traditional knowledge	
<b>Main Audit</b>	<p>The tribes have no legal claims to any fees; however, the NFF has never dealt with traditional knowledge the tribes would like to protect and commercialize. Thus, there is no commercialization on the part of the NFF of indigenous intellectual property, traditional knowledge, and/or forest resources owned by the tribes. As a result, no written agreement exists. This was verified through NFF employee and stakeholder contacts.</p>
<b>Indicator 3.4.c</b>	
Protocols are jointly developed with local tribes to protect their intellectual property rights when traditional knowledge is requested for use in forest management.	
<b>Main Audit</b>	<p>Intellectual property rights are currently not covered by legislation. However, both the USDA FS and consulting tribes realize that this is an area in need of attention. In 2006, the USDA FS tried to get legislation through the federal Office of Management and Budget called the Forest Service Tribal Relations Enhancement Act that would give the agency more authority in protecting traditional knowledge information obtained from tribes (the legislation did not go through). While there is a site protection clause in the FOIA under which a federal agency can withhold site location information, but it does not cover intellectual property or traditional knowledge.</p> <p>The NFF is careful to inform tribes that, although ethically they would like to, they cannot withhold</p>



information provided officially in writing. Past federal court rulings have ruled this so. However, the NFF have never had to face this issue because they have not dealt with traditional knowledge the tribes would like to protect. The document "Tribal Relations Implementation Team" contains information in Chapter 11, page 8 on ethical guidelines for dealing with intellectual property. These are guidelines, but not law.

**PRINCIPLE 4: COMMUNITY RELATIONS AND WORKER'S RIGHTS:**

Forest management operations shall maintain or enhance the long-term social and economic well being of forest workers and local communities.

**Criterion 4.1: The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services**

<b>Indicator 4.1.a</b>	<i>For example, quality work can include the following attributes:</i>
Forest work is packaged and offered in ways that create quality work opportunities for employees, contractors and their workers.	<ul style="list-style-type: none"> <li>• <i>Employee and contractor relationships that are long term and stable</i></li> <li>• <i>A mixture of diverse tasks requiring varying skill levels</i></li> <li>• <i>Opportunities for advancement</i></li> <li>• <i>A comprehensive package of benefits</i></li> <li>• <i>Opportunities for employee and contractor participation in decision-making</i></li> </ul>

**Main Audit**

The diverse activities engaged in by the USDA FS and NFF staff (e.g., timber sales administration, recreation management, wildlife management, archaeology) and contractors (e.g., timber harvesting, boundary line work, recreation concessionaire operations, habitat restoration) leads to quality and challenging work opportunities.

FSM 6100 (Personnel Management) and FSH 6100 (Personnel Management) provide guidelines for personnel practices. USDA FS criteria for hiring contractors evaluates work quality based on past performance, references, residence, and price. The NFF believes that contractor relations are positive and stable and that contractors view the NFF as an employer of choice. This was validated by long-term contractor re-bidding on the NFF. An interview with several owners and employees who are local logging contractors verified that relations have been long-term and stable.

All opportunities for employee advancement are made available to all USDA FS employees through its competitive procedures for advertising all vacancy announcements. Another process for doing this comes under the Merit Promotion Procedures. Those eligible include status (i.e., career or career-conditional) employees and persons meeting special hiring authorities. The Merit Promotion Plan can be found in the Forest Service Handbook FSH 6109.12, Chapter 20 - Internal Placement. The other outlet detailing employee advancement is the DEMO Authority. The U.S. Office of Personnel Management (OPM) sets the qualifications for each position, which is based on education, specialized experience, or a combination of both; solely on education; and/or whether they are already a federal employee. Employees are paid according to series (e.g., professional, technical, administrative) or grade general schedule pay scale. There are 10 steps for advancement within each level.

All full- or part-time USDA FS employees with employment exceeding 90 days are eligible to earn sick and annual leave. The amount is determined by the leave category they are in, but it is a minimum of four hours per bi-weekly pay period, which is pro-rated for part-time employees. The federal government Federal Friendly Family Leave Act is available to employees with certain restrictions. Information on this Act can be found at: <http://www.opm.gov/oca/leave/>.

Permanent employees are eligible to participate in a three-tiered retirement package which is composed of The Federal Employment Retirement System/Thrift Savings Plan/Social Security. There are three retirement plans: Civil Service Retirement System (CSRS), Federal Employees Retirement System (FERS), and CSRS Offset. Retirement benefits are based on age and years of service at the time of retirement. Life insurance is offered through the Federal Employees Group Life Insurance (FEGLI) program and health insurance benefits offered through the Federal Employees Health Benefit program. Eligibility varies depending on your appointment category. Each year there is an open period where employees can change their benefit declarations.

All actions with regard to contractors are performed within the constraints of procedures and regulations under which the USDA FS must act. Both USDA FS employees and contractors are encouraged to participate and provide input into decision-making processes. Contractors, who are more locally involved, have access to their NFF technical representative to provide feedback. NFF staff periodically meets with contractors before jobs are

	undertaken and then they confer during and after the job implementation. Interviews with logging contractors stated that the timber sale administrators visited the harvesting site as often as once a day.
<b>Indicator 4.1.b</b>	
Employment conditions (e.g., remuneration, benefits, safety equipment, training, and workman's compensation) are comparable for both non-local and local workers doing equivalent work.	
<b>Main Audit</b>	Communities and their citizenry residing within, or adjacent to, the NFF have unique opportunities for employment, training, and advancement. This was established through employee and contractor interviews. Since USDA FS employees are covered by federal law, employment conditions are as good for non-local workers as they are for local workers doing the same job. In addition, the union makes sure there is a level playing field for working conditions, benefits, and promotion. The union also represents those who are not members alongside its membership. The Human Resource Center in Albuquerque, New Mexico also oversees issues related the employment conditions.
<b>Indicator 4.1.c</b>	
Forest owners or managers give preference to the local procurement of goods and services.	<i>For example, forest owners or managers make an effort to employ foresters, loggers, and contractors from within the area of operation. (e.g., work opportunities are advertised in area newspapers).</i>
<b>Main Audit</b>	NFF try to spread work out to a number of contractors associated with the NFF. This is facilitated by the presence of three forests, each a good distance from each other. Contracts are awarded based on price, residence, capability, and past job performance. As an example, in an interview with a retired Contracting Officer who has been hired back part-time, there are a many types of vegetative management projects every year put out for bid such as mowing, planting, and non invasive surveys and other resource contracts. Recently, 11 different contracts were given out, mostly in Florida, with a few in Georgia. There were three different contracts for mowing, one for each of the three forests.  For any purchases or contracting over \$25,000 a package with appropriate specs is created, advertised, and put out on the Internet through Federal Business Opportunities (FedBizOpps), which is the single government point-of-entry (GPE) for Federal government procurement opportunities over \$25000. FedBizOpps will advertise the prospectus nationwide. Three quotes are needed. However, if the good or service is under \$25,000 the NFF, according the purchasing Agent in the Supervisor's Office, have always use locals.
<b>Indicator 4.1.d</b>	
Workers and contractors have the skills to perform their assigned duties. Forest owners or managers provide work opportunities for qualified, local workers.	
<b>Main Audit</b>	NFF employees are given the opportunities to obtain skills necessary to perform there duties (See 4.1.a.). NFF systems do not specifically address skill levels for contracted workers (see Major CAR M04).
<b>Indicator 4.1.e</b>	
Forest owners or managers contribute to public education about forestry practices, forest values (e.g., watershed protection, habitat), and preservation of local heritage in conjunction with schools, community colleges, and/or other providers of training and education.	
<b>Main Audit</b>	Interviews with NFF employees indicated that there is a number of activities whereby the NFF staff contribute to public education about forestry practices, forest values (e.g., watershed protection, habitat), and preservation of local heritage in conjunction with schools, community colleges, and/or other providers of training and education. However, much of the documentation for individual efforts resides in the personnel files for employees which are located in Albuquerque, New Mexico. For example, the GIS Specialist on the OscNF has taught a course on at Lake City Community College and also helped set up computer system for Lake and Baker County High School to implement a GIS system.  On a larger scale, there are several examples. Most notable is the contribution the NFF, in particular the OscNF staff, makes to the Olustee Battle Festival Re-enactment. Here the NFF provides access to the battle location, provides firewood from hazard trees, provides security, monitors for wildfires, maintain and clears the battle site, and along with several other services. They work hand in hand with the Florida State Parks and the Olustee

	<p>Citizen's Support Organization. Another major effort is the relationship of the NFF with the Florida Trail Association. The USDA FS has overall administration for the Florida National Scenic Trail and the Florida Trail Association manages the Trail's day-day operations. Various educational and outreach activities are associated with the Trail. For example, hikers have access to interpretive centers explaining Florida's natural history and geology. The team had an extensive interview with a Florida Trail volunteer, who stated the NFF has an employee whose title is Manager for the Trail, and is located in the Florida Trail Association's Office (which is located in the USDA FS Supervisor's Office in Tallahassee, Florida).</p>
<b>Indicator 4.1.f</b>	
Employee compensation and hiring practices meet or exceed the prevailing local norms for work requiring equivalent education, skills, and experience.	
<b>Main Audit</b>	<p>The USDA FS, and hence the NFF's, pay schedule is based on OPM job classifications. Salaries are competitive with those offered in private industry for the same job positions. The OPM sets the qualifications for each position description, which could be based on education, specialized experience, or a combination both; solely on education; and/or whether they are already a federal employee.</p>
<b>Indicator 4.1.g</b>	
Forest owners or managers provide and/or support training opportunities for workers to improve their skills.	
<b>Main Audit</b>	<p>The USDA FS provides a number of training opportunities for its employees to enhance their on-the-job skills and promote safety in the workplace. A list of training workshops offered was provided to the team. An extensive database is kept to track training accomplishments and needs. Documentation was provided to the team on training related to timber sale administration which included skill enhancement, financial management, basic and advanced sale administration, among others related topics. A record was also provided on the employee training records for pesticide application certification. In interviews with employees they are given various opportunities to seek out training external to the USDA FS. Training is documented in personnel folders and which reside in Albuquerque, New Mexico.</p> <p>Examples of safety related workshops offered to employees include Defensive Driving-Training, Work Place Violence, Hearing Conservation Plan, the National Forests in Florida, Bloodborne Pathogens Program &amp; Exposure Control Plan 2006. The former was taking place at the time of the evaluation. Documentation of the safety training can only be accessed by permission, thus was unavailable to the team. Most accidents on the NFF were attributed to backing up of vehicles and slips, scrapes, and falls. The Safety Officer provided documentation on the Intranet site, SHIPS-Safety and Health Information Portal system, whereby employees can enter in all safety related incidents to a central database. The Incident Recording Software Training workshop is given to employees to show them how to navigate the site. The workshop handout and a report from SHIPS were provided to the team. The NFF also has a Safety Officer and a Safety Committee on each District Ranger office which serves as the voice of all employees. Employees are encouraged to participate in the committees but must have 10 hours of training to be OSHA certified. The Safety Officer teaches this class.</p> <p>NFF systems do not specifically address training needs and requirements for contracted workers which implies that contractor education skills and training needs may not be sufficient to their roles and responsibilities. While interviews with available contractor personnel indicated appropriate competency training, the NFF system lacks a mechanism for evaluating or ensuring contractor training and education. NFF systems do not specifically address training needs and requirements for contracted workers. See CAR M04.</p>
<b>Indicator 4.1.h</b>	
Forest owners or managers, and their contractors comply with the letter and intent of applicable state and federal labor laws and regulations (see also 1.1.a).	
<b>Main Audit</b>	<p>The NFF, as a part of the USDA FS is required to comply with, and follow, many laws and regulations. Laws and regulations are a part of every aspect of the NFF's forest management operations, activities, and human resource relationships. This is stated in its Forest Plan. No violation of laws relative to labor laws were found by the team, nor were any disclosed to during on-site interviews.</p> <p>There are two primary areas of contractual agreements that must comply with the law, timber sale and service contracts. Contracts contain clauses specific to legal coverage and protection. Contracts are established with the</p>

intent of complying with all applicable state and federal laws. Standard clauses are used to cover specific legal coverage and protection and to specify items such as labor rates. Contractors and sub-contractors make a bond payment as do sub-contractors and suppliers.

Employees are not discriminated against because of gender, race, religion, age, and disability with respect to hiring, dismissal, remuneration, and other conditions of employment. This protection is guaranteed under Executive Order 11246, as amended, by the U.S. Equal Employment Opportunity Commission (EEOC).

**Criterion 4.2: Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families**

<b>Indicator 4.2.a</b>	
4.2.a. Forest owners or managers and their contractors develop and implement safety programs and procedures that include:	
Well-maintained and safe machinery and equipment	
Use of safety equipment appropriate to each task	
Documentation and posting of safety procedures in the workplace	
Educational efforts (such as Forest Industry Safety Training Alliance and Game of Logging)	
Contracts that include safety requirements	
Safety records, training reports, and certificates	

<b>Main Audit</b>	<p>OSHA requirements ensure that legislative mandates are in place to ensure that all applicable laws and/or regulations covering health and safety of employees are followed. The Occupational Safety and Health Act of 1970, Executive Order 12196 and 29 CFR (Code of Federal Register) 1960 are the major laws and regulations requiring the USDA Forest Service to furnish its employees with places and conditions of employment that are free from work-related safety and health concerns.</p> <p>Requirements for well maintained and safe machinery and equipment are addressed in 29 CFR 1910 and 1920 basis and addressed in the Health &amp; Safety Code Handbook. Monthly preventive maintenance checks are made on all vehicles (i.e., trucks, cars, machinery, trailers, ORVs). Each District Ranger office has a fleet manager who is provided with 26 days per year to maintain vehicles. Employees are not permitted to take vehicles home. All vehicles have a decal, on the front and back car tags, Homeland Security tags, credit cards, communication devices and first aid kits.</p> <p>Each position on the NFF has a Job Hazard Analysis (JHA) performed and reviewed with employees that documents hazards that can be encountered by the position and describes hazard mitigation procedures and required training. Safety incident records are maintained in a central database (SHIPS). NFF conducts accident investigations (i.e., safety reviews) on all incidents. Training and safety courses for NFF staff were fully reviewed during the evaluation.</p> <p>NFF health and safety programs include a Health and Safety Handbook, a full-time NFF Safety Officer, NFF Safety Committee, district-level designated collateral safety officers and committees. Monthly safety programs are conducted at each District Ranger office and the Forest Supervisor’s office. The Forest Supervisor’s Office contains a number of booklets and pamphlets related to employee safety and well-being (e.g., The USDA Handbook on Workplace Violence Prevention and Response). The team also viewed posting of various safety procedures in the offices visited; however, this information is also available to each employee through the Intranet.</p> <p>NFF does not require logger training, although they do require contractors and their staff to comply with OSHA regulations. Job inspections of contract work include health and safety guidelines required by the NFF. NFF timber sale administration staffs have attended training in OSHA requirements. Forest Service Manual 6700 (Safety and Health Program) and Forest Service Handbook (6700 Safety and Health Program) provide guidelines for NFF employee safety.</p> <p>The database on forest safety and health training received by NFF employees is sent to the NFF Safety Officer (See 4.1.g). The NFF Safety Officer can run queries on defensive driving, chain saw use, first aid, CPR, driving</p>
-------------------	---

	<p>qualifications, OHV use qualifications, and frequency of accidents by type of incident to name a few. A query on the latter was run and provided to the team.</p>
<p><b>Criterion 4.3:</b></p>	<p><b>The rights of the workers to organise and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labour Organisation (ILO).</b></p> <p><i>Applicability Note: Compliance with this criterion can be accomplished with guidance from: FSC Certification and ILO Conventions: (<a href="http://fsc.org/fsc/whats_new/documents/Docs_cent/2">http://fsc.org/fsc/whats_new/documents/Docs_cent/2</a>). Full texts of Conventions 87 (Freedom of Association and Protection of the Right to Organize) and 98 (Right to Organize and Collective Bargaining) can be read at the ILO website (<a href="http://www.ilo.org">www.ilo.org</a>)</i></p>
<p><b>Indicator 4.3.a</b></p>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• Language translation and cultural interpretation are employed when needed.</li> <li>• Cross-cultural training is employed when needed to integrate the workforce.</li> </ul>
<p>Forest owners or managers and their contractors develop mechanisms to resolve disputes between workers and management that take into consideration the cultural diversity of the southeast region.</p>	
<p><b>Main Audit</b></p>	<p>Employees have access to a union which is called the National Federation of Federal Employees. There is a union representative for the whole forest (i.e., Union President) who is currently located in the regional office. In addition, there is a union representative in each District Office. There is also a steward at the administrative office and at least one from each District Office. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests. On the NFF there also exists the Union Partnership Council which is composed of the Supervisor, Deputy Supervisor, an Administrative Officer, District Rangers, and union membership. It is the intent of this group to deal with issues in a non-adversarial fashion. There also exists a Leadership Team which was formed to advise leadership on projects plans and programs. SGS was given a list of the current Team representation which included the Ecosystem Management Staff Officer (S.O.); a Public Affairs S.O.; a Fire Management S.O.; a Regional Office Union Representative; Research Station staff; a Safety Officer; the Minerals, Engineering, and Recreational Land S.O.; District Rangers; the Law Enforcement Patrol Captain; an Administrative S.O., retired; the FMO Operations Coordinator; the Forest Planner; and a Forester.</p> <p>Documentation was also provided to the team covering two types of grievance procedures available to employees that are backed by law. The first is the Administrative Grievance System found in the Federal Personnel Manual; title 5, part 771, CFR. This system addresses grievances related to reconsiderations of Performance Management Recognition System (PMRS) performance appraisals. The second avenue for resolving disputes is through grievances which can be filed by an employee, a group of employees, the Union, and by management pursuant to 5 USC 7121. These complaints involve matters related to workplace issues. Both processes include employee protections, both during and after the grievance process. Training sessions are given to employees to take into consideration the sensitivities and complexities of the workplace. Examples include training in Privacy, Reasonable Accommodation, and No FEAR Act. The latter which deals with anti-discrimination and whistleblower protection laws. A sample of training certificates earned by employees was given to the team.</p>
<p><b>Criterion 4.4:</b></p>	<p><b>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.</b></p> <p><i>Applicability Note: People and groups directly affected by management operations may include: employees and contractors of the landowner, neighbours, fishers and hunters, recreational users, local water users, and forest products processors</i></p>
<p><b>Indicator 4.4.a</b></p>	
<p>Forest owners or managers contribute to designing and achieving goals for use and protection of forest and natural resources as articulated in local and regional plans. Examples of organizations working on these plans include watershed protection groups, BMP committees, and prescribed fire councils.</p>	
<p><b>Main Audit</b></p>	<p>The NFF contribute and work with many groups and organizations to protect and utilize appropriately forest and natural resources. The nature of these partnerships is delineated in the RLRMP. A prime example is the relationship with the Florida Park Service and the Florida Trail Association (See 4.1.g.). The NFF also work with the Florida Division of Forestry to coordinate roles and responsibilities related to fighting wildfires. Other groups working on these plans and educating the public include the North and Central Florida Rx Fire Councils.</p>
<p><b>Indicator 4.4.b</b></p>	
<p>4.4.b. Through a process that includes outside consultation (e.g., state archaeological offices,</p>	

<p>tribes, universities, and local experts), all sites and features of special cultural significance are identified and protected, such as:</p> <ul style="list-style-type: none"> <li>historic and other significant trails</li> <li>prominent viewing points</li> <li>landscape features</li> <li>champion or other notable trees</li> <li>prehistoric and historic features</li> </ul>	
<b>Main Audit</b>	<p>Extensive assessment of sites having special cultural significance is documented in the EIS, RLRMP, and other supporting records. The existing EIS process includes extensive and well-documented consultation procedures. NFF staff also consults with cultural (e.g., Tribal THPOs, SHPOS, independent Tribes), historic, and archaeological professionals to identify significant archaeological sites and before there can be any contracted or permitted archaeological survey work performed on the NFF. In the RLRMP, it states that under Federal law direction, the NFF must work with the Florida SHPO, with whom it has a MOU, to make sure that no sites are damaged. For a known site, protection might include avoiding activities that could affect it and keeping information about it confidential to prevent looting. For undiscovered sites, protection includes estimating the likelihood that a site may occur in a given area and then reviewing every activity, whether it is a USDA FS or public activity, for its possible effect on a site. To protect undiscovered sites from looting, for example, use of metal detectors is restricted. Documentation related to tribal ancestral sites was provided to the team by the Heritage Program Manager Specialist in the NFF Supervisor’s Office on correspondence related to outside consults. The team was also provided with a document titled “Minimum Standards for Contracted or Permitted Archaeological Survey in the National Forests of Florida” which outlined survey procedures before any ground disturbing work or research related to resource management can take place. A specific example relates to the Florida National Scenic Trail, where innumerable partners work together to facilitate all programs, particularly those related to maintenance and protection.</p>
<b>Indicator 4.4.c</b>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Interviews with adjacent landowners verify notification of relevant management activities</i></li> <li>• <i>Documentation of notification is provided.</i></li> <li>• <i>Management plan addresses neighbor and surrounding community smoke management concerns.</i></li> </ul>
<p>Prior to the commencement of operations with off-site impacts, forest managers inform potentially affected adjacent landowners and/or communities (e.g., downstream water users, municipalities) of proposed forestry activities. These impacts are addressed during project implementation.</p>	
<b>Main Audit</b>	<p>The NFF informs adjacent landowners and other affected parties of impending forest activities which might affect them in a variety of ways. The NEPA process and the mandates for public inputs provide an avenue for review of forest projects before any action is taken. Also, the Internet site for the NFF announces any impending forest activities as well. The Web site (<a href="http://www.fs.fed.us/r8/florida/projects/documents/sopa/sopa.shtml">http://www.fs.fed.us/r8/florida/projects/documents/sopa/sopa.shtml</a>) contains the following: “The Schedule of Proposed Actions (SOPA) is a list of proposals the Forest Service is currently considering and is updated quarterly during the fiscal year (October 01 - September 30). It summarizes projects, which if approved, would be implemented on the forest. As the Forest Service begins evaluating each proposal, we will contact the people or agencies on our public mailing lists for comment. If you are interested in one or more of the projects being considered and are not currently on our mailing list you may contact any of our Florida offices for more information. In addition, the Forest Service will publish legal notices in the appropriate newspaper of record.”</p>
<b>Indicator 4.4.d</b>	
<p>Forest owners or managers of large-scale operations provide opportunities for people affected by management operations to provide input into management planning.</p>	
<b>Main Audit</b>	<p>Tribes, other federal agencies, state and local governments, individuals, and organizations helped identify RLRMP revision issues. The procedures for providing inputs were outlined in the FEIS for the RLRMP. For example, a 10-step process defined in NFMA regulations was followed. Throughout public inputs and comments are solicited and incorporated into the process.</p> <p>The NFF uses its Web site to solicit comments and inputs on proposals for action (See 4.4c.).</p>
<b>DoD/DoE Indicator 4.4.1</b>	
<p>Forest managers carry out open, transparent, public consultative processes for the resolution of</p>	

<p>rights and claims (see Criterion 2.3), assessment of social impacts (see Criterion 4.4), assessment of environmental impacts (see Criterion 6.1, development and review of the management plan (see Criterion 7.1, and identification and delineation of High Conservation Value Forests (see Principal 9). Forest managers address input from all interested members of the public, locally and nationally, including lay and expert stakeholders. Managers provide written rationale for their decisions, in cases where management plans do not adopt the recommendations of public input.</p>	
<p><b>Main Audit</b></p>	<p>The elements of the consultative processes are addressed in NFF planning documents (e.g., FEIS, RLRMP). The NFF are engaged in carrying out open, transparent, public consultative processes for the resolution of rights and claims (See Criterion 2.3), assessment of social impacts (See Criterion 4.4), assessment of environmental impacts (See Criterion 6.1), and development and review of the RLRMP (See Criterion 7.1). However, since the NFF is not certified, gathering public inputs for the express purpose of identifying and delineating HCVFs has not been addressed. Although, the information is available to make such designations. See each Criterion as noted for details.</p> <p>NFF staff does not exclude any stakeholder inputs, therefore, it does not provide a rationale for not incorporating input from stakeholders. All inputs are considered as mandated by laws and regulations and through processes undertaken at the forest level to gather inputs (e.g., providing, through a number of venues, information on future management and planning activities and asking for inputs).</p>
<p><b>DoD/DoE Indicator 4.4.2</b></p> <p>Upon issuance of a certificate, the forest owner or manager makes a public announcement where and how the certifier's public summary and the full certification report will be made readily accessible to interested stakeholders. Locations of sensitive resource sites and classified information may be withheld.</p>	
<p><b>Main Audit</b></p>	<p>Since this is a Test-Evaluation, there will be no issuance of a certificate. However, the USDA FS and The Pinchot Institute for Conservation have indicated that all reports generated through this Test-Evaluation will be made public. The USDA FS is also subject to the Freedom of Information Act, thus the document will, by law, be available to the public. Locations of sensitive resource sites and classified information will only be withheld in compliance with current federal laws.</p>
<p><b>DoD/DoE Indicator 4.4.3</b></p> <p>Forest management and planning operations include measures to mitigate negative effects to local communities, the forest, and water quality that might accrue from the use and disposal of hazardous materials, munitions, and other military or industrial activities.</p>	
<p><b>Main Audit</b></p>	<p>Use and disposal of hazardous materials, munitions, and other military activities do occur on the NFF, in particular the ONF's U.S. Navy bombing range. Consequently the NFF have to account for this in forest management and planning. Applicable coordination with the U.S. Navy occurs for activities related to prescribed fire, law enforcement, boundary line maintenance, salvage harvests, and timber harvests. Federal and state law provide mitigation guidance for both the USDA FS and the U.S. Navy relative to hazardous materials, munitions, and other related activities (e.g., boundaries).</p> <p>Despite a buffer and areas that are off limits to the public, there were no indications from NFF staff or through stakeholder consultation that naval activities, as mentioned, have any negative effects on local communities or the forest. A 2001 study by the USGS indicated that ground and subsurface water related to ONF and Lake County, Florida were more affected by urban development than any other factor. The naval presence was not cited.</p>

**Criterion 4.5: Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage**

*Applicability Note: Provisions of Criterion 4.5 do not evoke protections or liabilities beyond those provided by U.S., state, and local laws.*

**Indicator 4.5.a**

Forest owners or managers attempt to resolve grievances and mitigate damage resulting from forest management activities through open communication and negotiation prior to legal action.

**Main Audit**

While NFF has an “open-door policy” for receiving public concerns, the actions that NFF staff may take in potentially litigious situations is limited by law and regulation. There are many informal (e.g., personal contact) and formal (e.g., letters) processes available for resolution of conflicts. In all cases, the intent is to resolve conflict at the lowest possible level through informal processes using open communication and negotiation rather than through those that might lead to legal action. If the problem can’t be resolved at this level, the NFF employee consults with their supervisor, who will direct them to the Office of the General Counsel. FSM 6170 provides detailed information and direction in this area.

**Indicator 4.5.b**

Forest owners, managers, and their contractors have liability insurance or other forms of financial protection (e.g., monetary assets).

**Main Audit**

The federal government is self-insured and, in addition, liability damages are covered under the Federal Tort Claims Act. Federal Acquisition Regulation (FAR) 28.306 addresses contractor insurance coverage. As a result of this regulation, the USDA FS, and NFF, do not require all contractors to carry liability insurance. The USDA FS has a mechanism in place where, when a contractor is engaged under contract he/she becomes an agent of the unit and is covered under the Federal Tort Claims Act. The only exception would be when they are working on a government installation, where liability insurance is required per FAR. Also, the USDA FS by regulation insists that contractors (e.g., loggers, truckers) must also comply with the federal regulations and laws applicable to the NFF. Contractors are not required to carry liability insurance for contract values under \$25,000. For contracts over \$100,000, the USDA FS requires specific kinds of insurance to adequately cover potential liabilities. Contracts less than \$100,000 or those procured under simplified act procedures require contractors to follow state law which includes certain types of insurance (e.g., all contracts require workman's compensation) that also covers potential liabilities. While contractors are not required to have liability insurance per se, they typically carry it.

**PRINCIPLE 5: BENEFITS FROM THE FOREST:**  
 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.

**Criterion 5.1: Forest management should strive towards economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest**

**Indicator 5.1.a**

Forest owners or managers are financially able to support long-term (i.e., decades rather than quarter-years or years) forest management (e.g., planning, inventory, resource protection, post-harvest management activities).

- For example:*
- *A budget shows that projected revenues and/or investments are sufficient to cover itemized activities and long-term management objectives with detail appropriate to scale. Such records can be considered proprietary.*
  - *Adequate revenues from timber sales are reserved for budgeted expenditures.*

**Main Audit**

The NFF, as part of the USDA FS, clearly display a financial capacity adequate to sustain long-term forest management, as intended by the standard. Historical monitoring evidence, staff interviews and field observations all support this finding.

**Indicator 5.1.b**

Increases in harvests or debt load as responses to short-term financial factors, such as fluctuations in the market, requirements for cash flow, need for sawmill



equipment and log supplies, are limited to levels that enable fulfillment of the management plan.	
<b>Main Audit</b>	Monitoring information and staff interviews show no evidence that harvest increases or debt load have been undertaken, as indicated. Some concerns were raised by the audit team concerning the ability of the organization to meet goals of the management plan, but these concerns are related to under-cutting rather than over-cutting (See below)
<b>Indicator 5.1.c</b>	
Investment and reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity.	
<b>Main Audit</b>	<p>There is evidence that persistent shortfalls in meeting harvest treatment goals may be creating conditions that threaten the overall health of the forest. Specifically, 2005 AMR indicates that through six years (60% of plan life) the following %s of timber harvests have occurred:</p> <p>Clearcut offsite slash pine – 13%</p> <p>Remove slash pine from mixed longleaf/slash (Osceola) – 0%</p> <p>Thin overstocked longleaf and slash stands – 17%</p> <p>Group selection harvests – 6%</p> <p>Shelterwood harvests – 0%</p> <p>These activities were planned to impact up to 105,000 acres or 17% of the total suitable acres in NFF in order to achieve the stated goals of improved forest health. To date only 11% have been achieved leaving the forest susceptible to damaging agents. Additionally, concern is raised about the implications of these plan shortfalls on key objectives of the management plan associated with RCW habitat recovery (see 1.1.a).</p> <p>See Major CAR M05.</p>
<b>Indicator 5.1.d</b>	
Forest owners or managers reinvest in the local economy and the community through both active civic engagement and ongoing capital investment.	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Facilities and equipment are regularly maintained and updated.</i></li> <li>• <i>Out-of-area owners maintain a local office.</i></li> <li>• <i>The owner or manager supports local business development by working with organizations, such as chambers of commerce.</i></li> </ul>
<b>Main Audit</b>	The infrastructure of management for the NFF is clearly significant in the local economic communities in which they operate. Numerous examples of civic engagement were noted. Capital investment of a significant local scale is readily evident.
<b>Indicator 5.1.e</b>	
Forest management activities produce an economic return as described in the primary objectives of the management plan.	<ul style="list-style-type: none"> <li>•</li> </ul>
<b>Main Audit</b>	Reference is made here to the harvest plan shortfalls noted above in 5.1.c. These shortfalls, and their attendant consequences are consistently attributed by staff to insufficient funding, staffing, and other resource allocation. Annual Monitoring reports include detailed summaries of income and expense from various management activities. In addition to the ubiquitous suggestions of inadequate resources, the audit team observed multiple examples of administrative inefficiency (e.g. detailed plan documentation and reporting requirements) that may be reducing the effectiveness of otherwise competent and enthusiastic staff. See Major CAR M05.
<b>Indicator 5.1.f</b>	
Marketing strategies are designed to maintain the economic efficiency of forest operations.	<ul style="list-style-type: none"> <li>• <i>For example, a competitive bidding process is used</i></li> </ul>
<b>Main Audit</b>	All reviewed timber harvests were contracted through a formal and well-regulated system of vendor evaluation and competitive bidding. Interviews with contract administrative staff, as well as contracted loggers indicate that economic returns from operations are within local norms. The overall scale of commercial timber harvest activities on the NFF is rather low.
<b>Criterion 5.2: Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</b>	
<b>Indicator 5.2.a</b>	
Products from timber sales are sorted and sold for the	<i>For example, records of timber sales document optimum use by providing a product's destination(s) and category (e.g., veneer logs,</i>

highest value and use.		<i>saw timber, poles, and/or pulpwood).</i>
<b>Main Audit</b>	Review of records from recent and active timber harvest included an appropriate variety of product categories. All indications were that appropriate sorting for highest value is being consistently achieved.	
<b>Indicator 5.2.b</b>		
Opportunities are given for local, financially competitive, value-added processing and manufacturing facilities.		
<b>Main Audit</b>	Interviews conducted with contractors on active timber sales indicate that the largest portion of NFF contract work is being supplied by local contractors. Records and NFF administrative staff confirm this pattern. While little evidence of active direct marketing by NFF was found, locally based wood markets appear to dominate.	
<b>Indicator 5.2.c</b>		
New markets are explored and developed for common but less-used species, grades of lumber, or an expanded diversity of forest products.		
<b>Main Audit</b>	One example was noted of exploration into new fuel-based market for low grade wood. This initiate with the city of Tallahassee is ongoing. Scale of this activity, though small, is consistent with the low level of harvest on the forest.	
<b>Indicator 5.2.d</b>		
When non-timber products (e.g., saw palmetto berries; Spanish moss; lichens; mistletoe; turkey; quail; deer; deer tongue, <i>Carphephorous odoratissima</i> ) are harvested, the management and use of those products are incorporated into the management plan.		
<b>Main Audit</b>	The 2005 annual monitoring report (Section 2.14, pg. 84) includes a summary of non-forest products produced under special permit on the NFF. This summary includes a variety of products including landscaping, craft, and other products. These collections are consistent with goals established in the RLRMP and managed appropriately at a rather small scale.	
<b>Criterion 5.3: Forest management should minimise waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</b>		
<b>Indicator 5.3.a</b>		<i>For example:</i>
Merchantable by-products of harvest and in-field milling operations are used or sold as feasible, after leaving adequate woody debris (see Glossary) on site to provide nutrient cycling and habitat.		<ul style="list-style-type: none"> <li>• <i>Chips and sawdust are used for mulch, filler, or fuel.</i></li> <li>• <i>Small diameter boles are used for fence posts, flooring, and furniture stock.</i></li> </ul>
<b>Main Audit</b>	All sites evaluated showed good utilization standards in place. In general, all commercial products were being produced from bolewood, with tops and brush appropriately distributed on the forest floor.	
<b>Indicator 5.3.b</b>		<i>For example:</i>
Harvesting, sorting, and handling operations are carried out in a way that maximizes utilization of forest resources, while minimizing merchantable log loss and waste.		<ul style="list-style-type: none"> <li>• <i>Merchantable wood is not left in the forest or the log yard.</i></li> <li>• <i>Care is demonstrated in felling trees to prevent broken tops or logs.</i></li> </ul>
<b>Main Audit</b>	Active sites evaluated during the audit all showed efficient and effective utilization and grade-sorting standards; following local market norms. In stand residual damage was consistently minimal.	
<b>Indicator 5.3.c</b>		<i>For example:</i>
Management operations are implemented in a way that protects the integrity of the residual stand (see Glossary). Provisions concerning acceptable levels of residual damage are included in operational contracts.		<ul style="list-style-type: none"> <li>• <i>Bumper trees are utilized, and equipment is selected and used in a way that minimizes unintentional damage to crop trees.</i></li> <li>• <i>Residual damage is minimal.</i></li> </ul>
<b>Main Audit</b>	Active sites evaluated during the audit all showed efficient and effective utilization and grade-sorting standards; following local market norms. In stand residual damage was consistently minimal.	

<b>Criterion 5.4: Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</b>	
<b>Indicator 5.4.a</b>	<i>For example:</i>
Forest managers diversify the long-term production of forest products and services (e.g., timber and non-timber forest product harvesting, ecotourism, hunting leases, watershed protection), while maintaining forest composition, structures, and functions.	<i>The forest manager provides a list of products and benefits being managed in the forest. The management objectives include a mix of forest products and services</i>
<b>Main Audit</b>	The RLRMP details a diverse and ambitious strategy for production of a wide variety of products, services and values over the long term. Reference is made to RLRMP, section 2, Forestwide Desired Future Conditions, Goals and Objectives.
<b>Criterion 5.5: Forest management operations shall recognise, maintain and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries. See also 6.5.h and i. Note: The working group considers this criterion sufficiently explicit and measurable. Indicators are not required.</b>	
<b>Main Audit</b>	Please see findings recorded for indicators 6.5.h and i.
<b>Criterion 5.6: The rate of harvest of forest products shall not exceed levels, which can be permanently sustained.</b>	
<b>Indicator 5.6.a</b>	<i>For example:</i>
The rate of harvest (annual or periodic) does not exceed levels that can be permanently sustained. The harvest rate is based on the management objectives, growth and yields estimates (as derived from stand table projections and/or published growth models), and harvest records.	<ul style="list-style-type: none"> <li>• <i>Stocking rates and volumes conform to projections of the management plan.</i></li> <li>• <i>The age-class distribution (see Glossary) required for sustainability and predicted yields in volume is justified by empirical data.</i></li> </ul>
<b>Main Audit</b>	The allowable cut strategy for the NFF is well documented and publicly available in the RLRMP, it's associated Record of Decision, and the Final EIS for the RLRMP. The audit team found the harvest rate assumptions in this plan to be generally conservative and fully consistent with the requirements of this standard. Actual rates of harvest – as reported in the Annual Monitoring Reports – are well below plan.
<b>Indicator 5.6.b</b>	<i>For example, records show that rates of tree growth meet or exceed harvest rates over a period of ten years or less.</i>
Once the age-class distribution (see Glossary) is commensurate with long-term sustainability, harvest levels maintain growth levels over a ten-year period. Exceptions to this constraint may be granted to forest owners or managers whose periodic re-entry cycle is longer than 10 years. In such cases, allowable harvest is determined by examining the volume of re-growth since the previous harvest as evidence of the owner or manager's commitment to allow an equivalent amount of re-growth before additional harvests.	
<b>Main Audit</b>	See 5.6.a above. Evidence from Annual Monitoring supported by field observations indicate that current harvest rates are well below 10-year growth.

**PRINCIPLE 6: ENVIRONMENTAL IMPACT:**

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.

**Criterion 6.1:** Evaluation of environmental impacts shall be completed - appropriate to the scale, intensity of forest management operations 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.

*Applicability Note: Small landowners 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 landowners and/or those who practice more intensive forest management.*

<b>Indicator 6.1.a</b>	<i>For example:</i>
6.1.a. Using available science and local expertise, an assessment of current conditions is completed that includes: <ul style="list-style-type: none"> <li>• ecological processes, such as disturbance regimes;</li> <li>• unique, vulnerable, rare, and threatened ecosystems/natural communities;</li> <li>• common plants, animals, and their habitats;</li> <li>• sensitive, rare, threatened, and endangered species (see Glossary) and their habitats;</li> <li>• wetlands and water resources; and</li> <li>• soil resources. (see also 7.1.a and b).</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Appropriate inventories and literature are on file.</i></li> <li>• <i>Field inspection verifies inventory information.</i></li> </ul>

<b>Main Audit</b>	<p>The NFF has a close relationship with the Forest Natural Areas Inventory Program – following guidance in the RLRMP (Goal 3, pg 2-3). FNAI is developing guidelines for managing endangered plants on the NFF.</p> <p>Field Evidence:</p> <ol style="list-style-type: none"> <li>1. Have a person on the ANF that is shared with The Nature Conservancy. She helps with rare species protection, invasive plant control and other aspects of the NEPA compliance.</li> <li>2. Gopher tortoise relocation study on Wakulla District ANF</li> <li>3. Ground restoration stewardship project</li> <li>4. National Wild Turkey Federation stewardship project.</li> <li>5. Barking tree frog study close to GT study.</li> </ol>
-------------------	--

<b>Indicator 6.1.b</b>	
Using available science and local expertise, current ecological conditions are compared to the historical conditions within the landscape context, using the baseline factors identified in 6.1.a	

<b>Main Audit</b>	<p>The RLRMP contains language consistent with this indicator in the Preface, Goals - #6 pg. 2-3. and the narrative on page 2-3. Additionally, the National Forest Mgmt Act includes requirements for the maintenance of native biodiversity.</p> <p>Examples of work on the ANF with RCW - burning has been incorporated into management strategies. Adaptive Management Process in the RLRMP which might lead to an amendment to the FMP.</p> <p>Field examples:</p> <ol style="list-style-type: none"> <li>1. Sand pine conversion to scrub jay habitat. Saw several examples of this on the Ocala NF.</li> <li>2. Fire to promote wire grass savannahs on the Apalach. NF.</li> </ol>
-------------------	---

	<ol style="list-style-type: none"> <li>3. Protection of flatwoods salamander ponds on ANF.</li> <li>4. Snag retention in sand pine clearcuts on Ocala NF.</li> <li>5. Thinning and group selection, even though it is way behind schedule, is being done to improve RCW habitat.</li> </ol>
<b>Indicator 6.1.c</b>	<p><i>For example, resources that are potentially affected include:</i></p> <ul style="list-style-type: none"> <li>• <i>ground cover</i></li> <li>• <i>residual trees</i></li> <li>• <i>regeneration</i></li> <li>• <i>wildlife and its habitat</i></li> <li>• <i>water quality and quantity</i></li> <li>• <i>soil compaction, structure, and fertility</i></li> <li>• <i>native communities/ecosystems</i></li> <li>• <i>biodiversity</i></li> <li>• <i>fragmentation</i></li> </ul>
<b>Main Audit</b>	<p>Multiple examples were reviewed of resource impact evaluation. Before any field work it done an intensive review of anticipated activities is done as part of the NEPA process. This process includes all the potentially affected items listed above.</p>
<b>Indicator 6.1.d</b>	
	<p>Using assessments derived from the above information, options are developed and implemented to maintain and/or restore the long-term ecological functions of the forest (see also 7.1.c).</p>
<b>Main Audit</b>	<p>The RLRMP contains language consistent with this indicator in the Preface, Goals - #6 pg. 2-3. and the narrative on page 2-3. Additionally, the National Forest Mgmt Act includes requirements for the maintenance of native biodiversity.</p> <p>Field examples:</p> <ol style="list-style-type: none"> <li>1. Sand pine conversion to scrub jay habitat. Saw several examples of this on the Ocala NF.</li> <li>2. Fire to promote wire grass savannahs on the Apalach. NF.</li> <li>3. Protection of flatwoods salamander ponds on ANF.</li> <li>4. Snag retention in sand pine clearcuts on Ocala NF.</li> <li>5. Thinning and group selection, even though it is way behind schedule, is being done to improve RCW habitat. (ANF and Osceola)</li> <li>6. Large burn in Juniper Wilderness Area started as prescribed burn but turned to wild fire after 20 days however during that 20 it "converted" thousands of acres from over-grown sand pine scrub that had been damage by recent hurricanes to early succession scrub. This mimicked a natural occurrence at the landscape level.</li> <li>7. Replanting longleaf in stands where slash pine was destroyed by wild fire (Osceola Site 2, 3, 6 &amp; 7) (ANF Compt 315, stn 16 and ANF site 1).</li> </ol>
<b>Criterion 6.2:</b>	<p><b>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.</b></p> <p><i>Applicability Note: The following lists provide information on the identification of threatened, rare, locally endemic, or endangered species of plants and animals and their habitats: federal, state, and county/local lists produced by government agencies, Natural Heritage Programs, state Natural Areas Inventories, and/or the World Wildlife Fund's classification of forest communities.</i></p>
<b>Indicator 6.2.a</b>	<p><i>Note: The landowner has the discretion to keep the specific location of rare populations or communities confidential.</i></p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Execution of the activities described in the management plan is verified in the field.</i></li> <li>• <i>Reference to relevant literature (e.g., endangered species lists, recovery plans, habitat conservation methods, state and local laws) is noted in the management plan.</i></li> </ul>
	<p>If state or federal listings and species databases indicate the likely presence of a sensitive, rare, threatened, or endangered species, either a survey is conducted prior to management activities being carried out (to verify the species' presence or absence) or the forest owner or manager manages as though the species were present. Any such species are noted on a map of the forest</p>

management area. Management activities are compatible with the maintenance, improvement, or restoration (see Glossary) of the species and its habitat.	<ul style="list-style-type: none"> <li>• <i>Qualified individuals survey for such species.</i></li> <li>• <i>When such a species is found on site, modifications are made in both the management plan and its implementation.</i></li> </ul>
<b>Main Audit</b>	<p>As part of NEPA process, prepare biological assessment for each project that address all listed species. These are submitted to the F&amp;WS for review. This includes both plants and animals.</p> <p>All G1, G2 and some G3 are on the Regional Foresters Sensitive Species List (as well as regional forest service web site). These species needs are addressed in every EA or EIS. Location information on these species are contained within layers of the GIS system.</p> <p>Field Evidence:</p> <ol style="list-style-type: none"> <li>1. Saw several example of protecting RCW trees from fire.</li> <li>2. Re-routed road to protection potential Flatwoods salamander pond (ANF Wakulla Compt 332, stn 20). Installed 1,500 buffer around pond in same sale.</li> <li>3. Development of scrub habitat</li> <li>4. Program to protect and enhance listed plants on Ocala NF.</li> <li>5. Sand Skink habitat program on Ocala NF.</li> <li>6. RCW population on ANF is recovered, Osceola growing at 5%/year, expanding on Ocala but have limited habitat. Ocala has exceeded the recovery goal for the first 10 years.</li> </ol>
<b>Indicator 6.2.b</b>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Forest owners or managers implement management practices necessary to protect the species and their habitats.</i></li> <li>• <i>Forest owners or managers consult outside experts on planned activities.</i></li> </ul>
Conservation zones are established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources, to protect rare, threatened, locally endemic, or endangered species and their habitats, and their connectivity within the landscape.	
<b>Main Audit</b>	<p>Field Evidence</p> <ol style="list-style-type: none"> <li>1. Re-routed road to protection potential Flatwoods salamander pond (ANF Wakulla Compt 332, stn 20). Installed 1,500 buffer around pond in same sale.</li> <li>2. Adequate buffers being installed around RCW cluster sites.</li> <li>3. Gopher tortoise burrows, when present, are protected from equipment damage by a “no equipment” buffer.</li> </ol>
<b>DoD/DoE Indicator 6.2.1</b>	
Forest areas that are slated for resource extraction or development are surveyed for Rare species and Rare plant community types (see Glossary) where survey protocols exist within the scientific literature, scientific community, or agency. Surveys are kept up to date. Where survey protocols do not exist, the forest owner or manager provides evidence of measures designed to protect and manage for Rare species	
<b>Main Audit</b>	<p>As part of NEPA process, prepare biological assessment for each project that address all listed species. These are submitted to the F&amp;WS for review. This includes both plants and animals. Examples were reviewed</p> <p>All G1, G2 and some G3 are on the Regional Foresters Sensitive Species List (should be on regional forest service web site). These species needs are addressed in every EA or EIS. Location information on these species are contained within layers of the GIS system.</p>
<b>DoD/DoE Indicator 6.2.2</b>	
A landscape level conservation and restoration analysis is completed.	
<b>Main Audit</b>	<p>Landscape scale assessment was conducted on the Osceola. Developed priority system for management. Apalachicola has similar system underway. This system helps direct on the ground management activities. “RCW core area on the Wakulla” is an example of the landscape scale assessment.</p>
<b>DoD/DoE Indicator 6.2.3</b>	
When the landscape level conservation and restoration	

<p>analysis required in DoD/DoE 6.2.2 indicates that existing protected areas, late-successional and old-growth forests and habitat for Rare species or plant community types are inadequately represented across the landscape so as to ensure their long-term viability, management for these attributes is given a priority within the forest management unit.</p>	
<b>Main Audit</b>	<p>“Guidance for Conserving and Restoring Old-Growth Forest Communities on NF in the Southern Region”. Local personnel submit areas to be included this process.</p> <p>The RLRMP addresses Old Growth in section 3-23 and Chapter 4, as well as objective 20 pg 2-6.</p>
<p><b>Criterion 6.3: Ecological functions and values shall be maintained intact, enhanced, or restored, including:</b></p> <p><b>a-Forest regeneration and succession.</b></p> <p><b>b-Genetic, species and ecosystem diversity.</b></p> <p><b>c-Natural cycles that affect the productivity of the forest ecosystem.</b></p> <p><i>Applicability Note: See Appendix B for a summary of the Southeast Working Group’s development of indicators 6.3.a.6, 6.3.a.7, and 6.3.a.8.</i></p> <p><b>APPLICABILITY TO PRIMARY AND OLD-GROWTH FORESTS:</b></p> <p><i>Due to the scarcity of old-growth forests in the Southeast states, they are normally designated as High Conservation Value Forests (see Principle 9). Certified old-growth forests <u>not</u> designated as High Conservation Value Forest are managed to maintain or recruit: (1) the existing abundance of old-growth trees, and (2) the landscape and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes. Limited timber harvest is permissible, provided these characteristics are retained or enhanced.</i></p> <p><i>Although old-growth trees and old-growth forests can be characterized ecologically, no practical nationwide definition of “old growth” can be objectively devised because old-growth characteristics differ by species and forest type, within and among regions. Regional working groups have determined which ecological characteristics (e.g., ages, structures, species composition, effective core area) describe old growth in the forests of their regions. See the Glossary for the Southeast definition of old-growth.</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</i></p>	
<b>Indicator 6.3.a</b>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Ecological connections and/or corridors to adjacent properties are maintained or improved.</i></li> <li>• <i>Cooperation with adjacent landowners is in place when and where possible.</i></li> <li>• <i>Note: This indicator may have limited applicability for 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></li> </ul>
<b>Main Audit</b>	<p>Evidence of example of appropriate cooperative management was available.</p> <p>Field Evidence:</p> <ol style="list-style-type: none"> <li>1. Cooperate with State of Florida to burn large tracts on the Osceola NF.</li> </ol>
<p>6.3.a.2. Forest owners or managers maintain or restore portions of the forest to the range and distribution of age classes of trees (including old/large trees) that result from processes that would naturally occur on the site.</p>	

<b>Main Audit</b>	Field Evidence 1. Cutting old sand pine and restoring early successional habitat on Ocala NF. 2.. Cutting "off site" slash pine and replanting with longleaf on ANF and Osceola NF. 3. Maintaining older longleaf stands by selective thinning and small group selection to promote regeneration.
6.3.a.3. Silvicultural practices generate conditions, including species composition, habitat types, and forest structures, that would naturally occur on the site.	
<b>Main Audit</b>	Numerous examples were observed to support the conservation and restoration of natural conditions on harvest sites. Field Evidence 1. Cutting old sand pine and restoring early successional habitat on Ocala NF. 2.. Cutting "off site" slash pine and replanting with longleaf on ANF and Osceola NF. 3. Replanting longleaf in areas where slash pine plantation were destroyed by wild fire.
6.3.a.4. Natural regeneration is used to sustain, enhance, or restore forest cover that is consistent with management objectives.	
<b>Main Audit</b>	A strategy of maintaining older longleaf stands by selective thinning and small group selection to promote regeneration, is being conducted on a large scale.
6.3.a.5. When natural regeneration is insufficient, practices (e.g. supplemental planting, burning, thinning) are employed to achieve desired stocking levels and contribute to species or genetic diversity and/or restore ecosystem structure and function.	<i>For example:</i> <ul style="list-style-type: none"> <li>• <i>Inventory of natural regeneration justifies enrichment planting (see 8.2.b).</i></li> <li>• <i>Planted species and spacing are ecologically appropriate.</i></li> <li>• <i>Records of numbers of trees and species planted are provided.</i></li> <li>• <i>Site preparation techniques, if required, minimize damage to residual stands, soils, and desirable understory and ground cover.</i></li> </ul> <i>Seed source is documented</i>
<b>Main Audit</b>	Natural regeneration is being practices on a relatively small scale on the NFF. Criteria evaluating regeneration success are integrated with artificial stocking criteria. All observed examples of natural regeneration displayed appropriate stocking levels.
6.3.a.6. Well-distributed quality seed trees are retained, and a desirable seedbed is created for all affected species for which natural regeneration is desired.	<i>For example:</i> <ul style="list-style-type: none"> <li>• <i>Adequate regeneration exists.</i></li> <li>• <i>Desirable species (see Glossary) present at low frequency are not harvested unless sufficient regeneration can be secured through natural or artificial means.</i></li> <li>• <i>The number of seed trees retained is sufficient to produce a well-stocked stand.</i></li> </ul> <i>Professional literature or experience is referenced to determine appropriate numbers of trees and their required distribution.</i>
<b>Main Audit</b>	The small group selection method being used in the longleaf stands has not be implemented long enough nor on a big enough scale to really measure the regeneration success. Field evidence suggests that all observed practices are reasonable and responsible. Adaptive management systems are adequate to address any shortfalls.
6.3.a.7. When uneven-aged management (see Glossary) is employed, canopy (see Glossary) openings are created in sizes that facilitate the regeneration of the species of tree being managed. Canopy openings are created using single-tree or group selection (see Glossary) and are within the range of non-catastrophic, natural openings common for each particular forest type and sufficiently large to regenerate desirable tree species.	<i>For example, justification is provided, based on professional literature or experience, for the size of canopy openings used in each forest cover type..</i>
<b>Main Audit</b>	Appropriate and supportable guidance is being employed for the small regeneration openings in Longleaf Pine



	(not to exceed 10% of the stand area).
6.3.a.8. 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), unless retention at a lower level is necessary for purposes of restoration or rehabilitation. The level of retention increases proportionally to the size of the harvest unit and is based on professional literature and/or experience.	
<b>Main Audit</b>	Only one example was observed where live trees were retained within an even-aged harvested area. This was appropriate because the only even-age management they do is to re-establish longleaf on slash pine sites or following a wild fire and only existing longleaf would be retained.. On all the slash pine sites observed, with the one exception noted, all overstory trees were removed. Uneven-aged regeneration harvest are conducted at a rather low intensity and are designed around restoration and habitat management objectives.
6.3.a.9. Primary and uneven-aged natural and semi-natural stands (see Glossary for definitions of forest types) are retained as such. Degraded semi-natural stands (see Glossary) may be converted to even-aged stands (see Glossary) for the purpose of restoration.	<i>Professional literature or experience is referenced to determine appropriate numbers of trees and their required distribution.</i>
	NFF management strategies closely follow this indicator. See 6.3.a.8.
DoD/DoE 6.3.a.1. Late-successional and old-growth stands of all sizes are identified. Forest management is conducted only to maintain or enhance their late successional and old-growth composition, structures, and functions.	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ Control and removal of exotic species is carried out.</li> <li>▪ Prescribed fire may be used.</li> <li>▪ Habitats of late-successional and Rare species may be created or enhanced.</li> </ul>
<b>Main Audit</b>	Observed many examples of prescribed fire. Exotics are being actively controlled where they occur. Virtually all management on all forests in Florida is geared towards rare species.
<b>Indicator 6.3.b</b>	
6.3.b.1. Forest management activities maintain a diversity of groundcover and a mix of mid story and canopy species that are found in the natural communities so as to maintain or enhance the productive capacity of the site being managed, as well as genetic, species, and community diversity.	
<b>Main Audit</b>	Field observations notes an appropriate level of diversity, both in structure and composition across the NFF. No evidence is apparent that productive capacity is limited due to lack of natural diversity.
6.3.b.2. A diversity of habitats for native species is protected, maintained, and/or enhanced, such as: <ul style="list-style-type: none"> <li>• Declining trees and snags (see Glossary);</li> <li>• Vertical and horizontal structural complexity;</li> <li>• Understory species diversity;</li> <li>• Well-distributed, large woody debris;</li> <li>• Habitats and refugia (see Glossary) for sedentary species and those with special habitat requirements.</li> <li>• Riparian areas on rivers, streams, springs, bogs, and seeps.</li> </ul>	
<b>Main Audit</b>	<p>The RLRMP includes appropriate criteria for this indicator – Forestwide Standards &amp; Guidelines – Timber Production pg. 3-19-21.</p> <p>Field evidence:</p> <ol style="list-style-type: none"> <li>1. Plenty of evidence on the Ocala (Compt. 66, stn 21, Gasline Sale) of snag retention and brush clumps following chopping. Technique call</li> </ol>

	<p>“Sloppy Chop” to produce this condition.</p> <ol style="list-style-type: none"> <li>2. Individual tree protection (mainly large oaks) during herbicide application.</li> <li>3. Installing kestrel nesting boxes in clearcuts on Ocala NF. (Compt. 66, stn 21, Gasline Sale)</li> <li>4. “Living snags” retained in harvested area on Osceola NF.</li> </ol>
6.3.b.3. Locally threatened ecosystems or communities (e.g., pitcher plant bogs, savannahs, prairies, and isolated wetlands) and fragile or unique areas (e.g., isolated ephemeral wetlands, sinkholes, endangered endemic populations (see Glossary), and other rare and threatened habitats) are identified, mapped, and maintained for their ecological functions..	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Forest owners or managers have a copy of or have access to relevant Natural Heritage Inventory, Natural Areas Inventory, or other inventories.</i></li> </ul> <p><i>No evidence of significant alterations to these areas exists</i></p>
<b>Main Audit</b>	<p>All G1, G2 and some G3 are on the Regional Foresters Sensitive Species List (as well as on regional forest service web site). These species needs are addressed in every EA or EIS.</p> <p>Location information on these species are contained within layers of the GIS system.</p>
6.3.b.4. Naturally non-forested land and forest gaps that provide a diversity of wildlife habitat are maintained.	
<b>Main Audit</b>	Good example are the wet savannahs on the ANF.
6.3.b.5. High grading (see glossary) is not practiced.	
<b>Main Audit</b>	No evidence of high-grading was observed.
DoD/DoE 6.3.b.1. Management units and sites that functions as ecological refugia (see Glossary) and relict areas (see Glossary), either formally or due to the historical exclusion of management activities, are identified and continue to be managed as such. Forest management is limited to actions needed to support the composition, structures, and functions of the refugium or relict area.	
<b>Main Audit</b>	<p>“Guidance for Conserving and Restoring Old-Growth Forest Communities on NF in the Southern Region”. Local personnel submit areas to be included this process.</p> <p>RLRMP includes appropriate guidance for this indicator in Old Growth 3-23 and Chapter 4. Objective 20 pg 2-6.</p>
<b>Indicator 6.3.c</b>	
6.3.c.1. Coarse woody debris, in the form of large fallen trees, large logs, and snags of various sizes, is maintained.	
<b>Main Audit</b>	Observed harvests included specific retention of coarse woody debris. Local conditions are not conducive to long-term maintenance.
6.3.c.2. Forest owners or managers maintain natural nutrient cycles, soil fertility, and structure by leaving residues in the forest and minimizing soil disturbance.	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Slash is left distributed or redistributed into the forest.</i></li> </ul> <p><i>Burning is used when and where it is appropriate to the natural disturbance regime</i></p>
<b>Main Audit</b>	Slash distributed following timber sales. Soil disturbance minimized by single instead of double chopping.
6.3.c.3. If soil degradation occurs, as indicated by declining fertility or forest health, forest owners or managers modify soil management techniques.	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Primary management objectives shift from commercial production to restoration.</i></li> <li>• <i>Site preparation is minimized.</i></li> <li>• <i>Road system design and construction is upgraded.</i></li> <li>• <i>The lightest practical equipment with the lowest ground pressure is used.</i></li> <li>• <i>Whole-tree harvesting is discontinued, and tops are left</i></li> </ul>

	<p><i>in the forest.</i></p> <ul style="list-style-type: none"> <li>• <i>Longer rotations and a diversity of species are used in lieu of artificial fertilization.</i></li> </ul> <p><i>Natural, early successional processes are allowed or encouraged</i></p>
<b>Main Audit</b>	A good system to monitor soil moisture was reviewed on the ANF to prevent logging damage during wet times.
6.3.c.4. Hydrological functions, including those of wetlands and other sensitive areas, are maintained, enhanced, and/or restored.	
<b>Main Audit</b>	Plan details, supported by field observation indicate appropriate attention to maintaining and/or enhancing wetland function.
6.3.c.5. Prescriptions for salvage harvests balance ecological and economic considerations.	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Coarse woody debris is maintained.</i></li> <li>• <i>Den trees and snags are maintained.</i></li> <li>• <i>Background levels of native pest populations are allowed.</i></li> </ul> <p><i>Potentially devastating pest outbreaks are controlled expeditiously.</i></p>
<b>Main Audit</b>	Several examples of hurricane and wild fire salvage were observed. Large areas of hurricane damaged sand pine has been harvested and reseeded with sand pine to promote early successional scrub jay habitat. Numerous snags are left in these areas. Several wild fire areas were observed that have been reforested with longleaf seedlings, most from seed from the forest.
6.3.c.6. Prescribed burning reflects the natural fire regime, including its periodicity, intensity, variability, seasonality, and timing. Prescribed burning is documented and implemented by qualified personnel in accordance with a burn prescription.	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Documentation for the history of natural and prescribed fires in the forest management area is provided.</i></li> <li>• <i>A prescription is prepared for each burn. Prescriptions include burn-unit maps, desired wind direction, smoke-sensitive areas, locations of fire breaks, and other relevant information in the plan and on the map.</i></li> </ul> <p><i>Burning is implemented in accordance with the fire management plan.</i></p>
<b>Main Audit</b>	<p>The LMRP addresses this indicator in the Forest wide management section Goal #10, page 2-4. Objective 4, pg 2-5.</p> <p>A very active burning program was observed with specific goals and objectives. Goals are in place to conduct a certain amount of burning in growing and non-growing seasons. Detailed burning plans are developed for each burn.</p> <p>Field Evidence:</p> <ol style="list-style-type: none"> <li>1. Lots of burning observed. Most fire is prescribed but wild fire do occur and some, especially in the case of hurricane damaged areas certainly create improved habitat conditions.</li> <li>2. Observed the Juniper Wilderness Area fire that was started as a prescribe burn and ended up being a wild fire after 20 days. The result of this burn was a major improvement of scrub jay habitat within the wilderness area, particularly in hurricane damaged areas. Burn covered about 7,000 acres.</li> <li>3. 70% of burning on Ocala is growing season.</li> </ol>

**Criterion 6.4: Representative samples of existing ecosystems within landscapes shall be protected in their natural state and recorded on maps, appropriate to the scale of operations and the uniqueness of the resource.**

Applicability Note: When forest management activities (including timber harvest) create and maintain conditions that emulate an intact, mature forest or successional phases that are under-represented in the landscape, the management system that created those conditions is used to maintain them, and the area may be considered a representative sample for the purposes of meeting this criterion.

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 plant 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 manipulated to maintain the desired conditions. Areas serving the purposes of (3) are fixed in location.

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.

*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.*

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

<b>Indicator 6.4.a</b>	<b>Verifiers &amp; Guidance:</b>
Fragile and/or unique ecosystems present in the forest management area are identified and described in the management plan. The location of such ecosystems is noted on a map of the forest management area.	

<b>Main Audit</b>	<p>The RLRMP addresses this indicator in - Preface, Goals - #6 pg. 2-3. Narrative on page 2-3. Additionally the National Forest Mgmt Act requires maintenance of native biodiversity. Pg. 2.4</p> <p>Field examples:</p> <ol style="list-style-type: none"> <li>1. Sand pine conversion to scrub jay habitat. Saw several examples of this on the Ocala NF.</li> <li>2. Fire to promote wire grass savannahs on the Apalach. NF.</li> <li>3. Protection of flatwoods salamander ponds on ANF.</li> <li>4. Large burn in Juniper Wilderness Area started as prescribed burn but turned to wild fire after 20 days however during that 20 it "converted" thousands of acres from over-grown sand pine scrub that had been damaged by recent hurricanes to early succession scrub. This mimicked a natural occurrence at the landscape level.</li> <li>5. Replanting longleaf in stands where slash pine was destroyed by wild fire (Osceola Site 2, 3, 6 &amp; 7) (ANF Compt 315, stn 16 and ANF site 1).</li> </ol>
-------------------	--

<b>Indicator 6.4.b</b>	<b>Verifiers &amp; Guidance:</b>
Forest owners or managers assess the adequacy of representation of their forest types in conservation zones across the landscape. This assessment will entail	

collaboration with state natural heritage programs; public agencies; regional, landscape, and watershed planning efforts; universities; and/or local conservationists and can include gap analysis.	
<b>Main Audit</b>	<p>The NFF has a close relationship with the Forest Natural Areas Inventory Program – following guidance in the RLRMP (Goal 3, pg 2-3). FNAI is developing guidelines for managing endangered plants on the NFF.</p> <p>This is also addressing the RLRMP, Goal 3, pg 2-3.</p> <p>Field Evidence:</p> <ol style="list-style-type: none"> <li>1. Have a person on the ANF that is shared with The Nature Conservancy. She helps with rare species protection, invasive plant control and other aspects of the NEPA compliance.</li> <li>2. Gopher tortoise relocation study on Wakulla District ANF</li> <li>3. Ground restoration stewardship project</li> <li>4. National Wild Turkey Federation stewardship project.</li> <li>5. Barking tree frog study close to GT study.</li> </ol>
<b>Indicator 6.4.c</b>	<b>Verifiers &amp; Guidance:</b>
Where existing protected areas within the landscape are not of a size and configuration to serve the above purposes, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable areas that serve the three purposes described in the above applicability note.	
<b>Main Audit</b>	Evidence indicates that the NFF has been appropriately supportive of the requirements of this indicator. See references in 6.4.a,b,d.
<b>Indicator 6.4.d</b>	<b>Verifiers &amp; Guidance:</b>
In the certification of public lands, large, contiguous public forests under the management of one agency (see Glossary) create and maintain representative conservation zones sufficient in size to allow natural disturbances to occur at their natural rate. The size and extent of representative samples on public lands is determined through a transparent planning process that is accessible and responsive to the public; in addition, the process and rationale are explicitly described in the public summary.	
<b>Main Audit</b>	The NEPA planning process, along with other FS guidance, noted above, provide adequate assurance of transparent and accessible planning of conservation zones. Examples are noted above.
<b>DoD/DoE Indicator 6.4.1</b>	<b>Verifiers &amp; Guidance:</b>
<p>The management plan contains a description of and near-term (e.g. within five years) implementation plan for initiation of restoration for broad scale ecological processes (e.g. natural fire regimes, successional patterns, flooding), if</p> <ol style="list-style-type: none"> <li>1. they're not present in the landscape in a substantially unmodified condition, and</li> <li>2. the size of the forest and its primary mandated use can accommodate their restoration.</li> </ol>	
<b>Main Audit</b>	<p>The LMRP addresses this indicator in - Preface, Goals - #6 pg. 2-3. Narrative on page 2-3. Additionally, the National Forest Mgmt Act requires maintenance of native biodiversity. Pg. 2.4</p> <p>Examples include fire regimes in sand pine scrub. Growing season fire in much of the longleaf habitat.</p>

<b>DoD/DoE Indicator 6.4.2</b>	<b>Verifiers &amp; Guidance:</b>
When the analysis conducted under DoD/DoE 6.2.2 indicates that existing protected areas within the landscape are not adequate in number, size, or configuration to assure the long term viability of the existing elements of native biological diversity (including but not limited to Rare species and plant community types, ecological refugia and relict areas (see Glossary)), the forest manager designates protected areas to enhance their viability.	
<b>Main Audit</b>	Core goals of the LMRP – most notably associated with RCW and Scrub Jay habitat management are designed around appropriately scaled resource analysis.
<b>Criterion 6.5: Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.</b>	
<b>Indicator 6.5.a</b>	<i>For example, there is no evidence of significant degradation to soil or water quality.</i>
Logging operations and construction of roads and skid trails are carried out only during periods of weather when soil compaction, surface erosion, or sediment transport into streams and other bodies of water can be kept to a minimum. There are provisions in sales contracts to interrupt harvest operations under adverse environmental conditions.	
<b>Main Audit</b>	Criteria for addressing this indicator are contained within the language of the USFS timber harvesting contracts. This contract language includes appropriately specific standards for minimizing erosion and sedimentation. FS guidelines for enforcing contract provisions include provision to suspend operations as needed. Field interviews and observations support appropriate implementation of these provisions.
<b>Indicator 6.5.b</b>	<i>Note: “Extreme risk” is a legally binding term in some states; see respective state BMP’s.</i>
Implementation of harvesting, road construction, and other mechanical operations follow the management plan and meet or exceed state Best Management Practices (BMPs) and applicable water quality regulations. Silvicultural techniques and logging equipment vary with slope, erosion-hazard rating, and/or soil instability in order to minimize soil disturbance. Areas that exhibit an extreme risk of landslide are excluded from logging.	<i>For example, a logging contract contains requirements to conform to state BMPs and a damage liability clause</i>
<b>Main Audit</b>	<p>The NFF lists activities in contracts to ensure BMP compliance. All potential sensitive areas are marked prior to harvest operations and are not included in the sale area.</p> <p>A discussion with Will Ebaugh, Forest Hydrologist, indicated that the Ocala NF may clearcut sand pine to the waters edge. This may be in violation of Florida BMPs. This was not observed first hand. See NC 07</p> <p>RLRMP – Watershed and Air pg. 3-24. WA 1 requires to adhere to 1993 BMPs. This reference was appropriate when plan was written – latest FL BMP guidance is dated 2004.</p> <p>Some specific BMPs are a little more stringent than in the State BMP.</p> <p>Most of field foresters have gone to State BMP training.</p> <p>Standards for sand pine harvesting on the Ocala NF – specifically regarding shoreland setbacks for clearcutting – may not be consistent with FL BMP standards (see CAR 10). Additional evidence collected on review indicates that this practice is consistent with interpreted guidance of FL BMPs. See closeout detail in CAR 10.</p>
<b>Indicator 6.5.c</b>	<i>For example, post-harvest inspection of the site indicates no significant damage to residual trees, ground cover, wildlife and/or their habitats, and soils (including erosion, rutting, and compaction).</i>
Logging operations avoid damage to residual trees, regeneration, ground cover, soils, waterways, and wetlands.	
<b>Main Audit</b>	Active and recent harvesting operations observed during the audit showed consistently low impacts to sensitive features and adjacent areas.

<b>Indicator 6.5.d</b>		
Plans for site preparation specify the following mitigations to minimize impacts to the forest resource:		
<ul style="list-style-type: none"> <li>• Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low fire hazard levels.</li> <li>• Scarification of soils is limited to the minimum necessary to achieve successful regeneration of desired species.</li> <li>• Topsoil is minimally disturbed.</li> </ul>		
<b>Main Audit</b>	Minor amounts of mechanical site preparation are employed. Observed sites displayed very little soil disturbance. Slash concentration was isolated and minor in scale.	
<b>Indicator 6.5.e</b>		
The transportation system is designed, constructed, maintained, and/or reconstructed to minimize the extent of the road network and its potential adverse cumulative effects		<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• Road density is minimized.</li> <li>• Displacement of soil and the sedimentation of streams, as well as impacts to water quality, are minimized.</li> <li>• Patches of habitat and migration corridors are conserved as much as possible.</li> <li>• 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.</li> </ul> <p><i>To avoid damage, log landings are on level areas away from streams, and skid trails and roads avoid steep grades and have adequate water control structures.</i></p>
<b>Main Audit</b>	The road system on the NFF is generally mature. Little new construction is planned or needed. Some reconstruction of older roads was reviewed. Quality standards were appropriate and consistently implemented. Staff interviews indicated concerns with a significant backlog of maintenance needs. The audit team observed numerous, but generally minor, locations where surfacing and grading were probably warranted. No significant environmental concerns were identified.	
<b>Indicator 6.5.f</b>		
Access to temporary and permanent roads is controlled to minimize impacts to soil, biota, and public roads while allowing legitimate access as addressed by Principles 3 & 4 and identified in the management plan.		<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• Roads without a weather resistant surface (e.g., soil, dirt, or native-surfaced roads) are used only during periods when conditions are favorable to minimize road damage, surface erosion, and sediment transport.</li> <li>• Access to roads not immediately necessary for management purposes is restricted.</li> </ul>
<b>Main Audit</b>	Access is the subject of considerable an ongoing concern and debate within the NFF. The audit team found these ongoing management activities sufficient to address the intent of this indicator. This challenging area is likely to continue to attract attention and concern.	
<b>Indicator 6.5.g</b>		
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.		
<b>Main Audit</b>	The nature of the landscape prevalent on the NFF significantly minimizes potential for active erosion. The audit team encountered only one example of a failed drainage structure on a minor access road on the ANF. The nature of the associated hazard was judged to be insignificant.	
<b>Indicator 6.5.h</b>		
Streamside or special management zones (SMZs) are specifically described and/or referenced in the management plan, included		

<p>in a map of the forest management area, and designed to protect and/or restore water quality and aquatic and riparian populations and their habitats (including river and stream corridors, steep slopes, fragile soils, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas).</p> <p>At a minimum, management of SMZs has the following characteristics:</p> <ul style="list-style-type: none"> <li>• Management meets or exceeds state BMPs.</li> <li>• SMZ width reflects changes in forest condition, stream width, slope, erodibility of soil, and potential hazard from windthrow along the length of the watercourse.</li> <li>• SMZs provide sufficient vegetation and canopy cover to filter sediment, limit nutrient inputs and chemical pollution, moderate fluctuations in water temperature, stabilize stream banks, and provide habitat for riparian and aquatic flora and fauna.</li> <li>• Characteristic diameter-class distributions, species composition, and structures are adequately maintained within the SMZs.</li> </ul>	
<b>Main Audit</b>	Detailed plans associated with management activity (particularly harvests) included appropriate identification and delineation of SMZs, when needed. The nature of the NFF landscape allows these riparian areas to be managed principally by avoidance. This strategy was demonstrated to be both efficient and effective in practice.
<b>Indicator 6.5.i</b>	<i>For example, all wetlands, including isolated wetlands, are protected from adverse changes in hydrology caused by ditching, dyking, draining, and filling.</i>
Wetlands in the forest management area are classified in the management plan, mapped, and their ecological and hydrological qualities are maintained or improved.	
<b>Main Audit</b>	Detailed plans associated with management activity (particularly harvests) included appropriate identification and delineation of wetlands, when needed. The nature of the NFF landscape allows these riparian areas to be managed principally by avoidance. This strategy was demonstrated to be both efficient and effective in practice.
<b>Indicator 6.5.j</b>	<i>For example:</i>
Stream crossings are located and constructed to minimize fragmentation of aquatic habitat and maintain water quality.	<ul style="list-style-type: none"> <li>• <i>Riparian management zone crossings are kept to a minimum.</i></li> <li>• <i>Stream crossings are installed at an angle that causes least damage.</i></li> </ul> <p><i>Culverts allow free passage of aquatic organisms.</i></p>
<b>Main Audit</b>	Detailed plans associated with management activity (particularly harvests) included appropriate identification and delineation of wetlands, when needed. The nature of the NFF landscape allows these riparian areas to be managed principally by avoidance. This strategy was demonstrated to be both efficient and effective in practice.  Stream crossing of land management roads were infrequently encountered and appropriately designed.
<p><b>Criterion 6.6:</b> 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 Organisation Type 1A and 1B 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 minimise health and environmental risks.</p>	
<b>Indicator 6.6.a</b>	Forest owners or managers employ silvicultural systems, integrated pest management, and strategies to control vegetation that minimize adverse environmental



<p>impact. Techniques, other than chemical applications, are emphasized in the implementation of these strategies. Components of silvicultural systems, integrated pest management, and strategies to control vegetation include several or all of the following:</p> <ul style="list-style-type: none"> <li>• Creation and maintenance of habitat that discourages pests;</li> <li>• Creation and maintenance of habitat that encourages natural predators;</li> <li>• Evaluation of pest populations and establishment of action thresholds;</li> <li>• Diversification of species composition (see Glossary) and structure;</li> <li>• Use of mechanical methods to control pests;</li> <li>• Use of prescribed fire to control pests;</li> <li>• Selection and application of proper pest control methods to avoid negative impacts on non-target organisms;</li> <li>• Modification of stand structure to improve forest health (e.g., thinning)</li> </ul>	
<p><b>Main Audit</b></p>	<p>Strategies for vegetation management are detailed in the RLRMP section 3-16, Forestwide Standards and Guidelines, Vegetation.</p>
<p><b>Indicator 6.6.b</b></p>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Forest management plan includes a description, evaluation, and comparison of integrated pest management (see Glossary) practices that might be used for common problems.</i></li> <li>• <i>Forest management plan or other documents contain detailed justification, in terms of forest health and growth, for any use of insecticides, fungicides, or herbicides.</i></li> <li>• <i>Forest owners or managers are aware of the more significant potential pest problems typical for the region and have some knowledge of control procedures.</i></li> <li>• <i>Pest (e.g., insects, disease, animals) surveys or observations are periodically conducted.</i></li> </ul> <p><i>Cost/benefit estimates and environmental impacts are evaluated prior to implementing any pest control methods.</i></p>
<p style="margin-left: 20px;">■ Forest owners or managers develop written pest control strategies as a component of the management plan (criterion 7.1).</p>	
<p><b>Main Audit</b></p>	<p>The NFF is using very little herbicide. Herbicides are used for longleaf establishment, and for the control of exotic, invasive plant species. Herbicides used were applied on a grid pattern (Velpar), or to treat areas of exotic species. No broadcast applications were observed. Herbicide rates were below the maximum-labeled rate. Written criteria for these practices are included in the RLRMP, section 3-16, Forestwide Standards and Guidelines, Vegetation.</p>
<p><b>Indicator 6.6.c</b></p>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Pest control methods are applied by trained personnel, following a written prescription.</i></li> </ul> <p><i>Records of location, application rates, and weather conditions are on file for each application.</i></p>
<p style="margin-left: 20px;">When chemicals are being used, a written prescription is prepared that describes application objectives, rates and methods of their application, risks and benefits of their use, methods to reduce dependence on chemicals, and the precautions that must workers employ. Records are kept of pest occurrences and control measures taken.</p>	
<p><b>Main Audit</b></p>	<p>Application records were reviewed for recent applications. All appropriate information was included. Legal and regulatory guidelines were complied with.</p>
<p><b>Indicator 6.6.d</b></p>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>There are no records of violations.</i></li> <li>• <i>All equipment for transport, storage, and application of chemicals is safe and leak proof, and complies with</i></li> </ul>
<p style="margin-left: 20px;">The use of pesticides (e.g., herbicides, insecticides, fungicides, fumigants, rodenticides, and algaecides)</p>	

<p>does not harm employees, neighbors, the public at large, or sensitive areas as per 6.3.b.3, 6.3.c.4, or 6.5.h. All applicable laws and label requirements for chemical use are followed. Records are kept that identify incidences of worker exposure to chemicals.</p>	<p><i>all federal and state safety standards.</i> <i>The current labels and Materials Safety Data Sheets (MSDS) are present for pesticides on site.</i></p>
<b>Main Audit</b>	<p>Application records were reviewed for recent applications. All appropriate information was included. Legal and regulatory guidelines were complied with.</p>
<b>Indicator 6.6.e</b>	<p><i>For example:</i></p>
<p>Application of pesticides and their effects are confined to the target area and species.</p>	<ul style="list-style-type: none"> <li>• <i>There is no evidence that non-target flora or fauna have been significantly damaged by pesticide applications.</i></li> </ul> <p><i>There is no evidence of off-site damage from pesticide applications</i></p>
<b>Main Audit</b>	<p>All applications employed highly precise techniques, including spot guns or banded applications.</p>
<b>Indicator 6.6.f</b>	
<p>Forest owners and managers demonstrate compliance with FSC Policy paper: "Chemical Pesticides in Certified Forests, Interpretation of the FSC Principles and Criteria, July 2002.</p>	
<b>Main Audit</b>	<p>Two materials in use – hexazinone and imazapyr – are currently listed as prohibited by FSC policy. Applications for derogation are pending decision. Failure of the derogation process will require discontinuation of use. See CAR 06.</p>
<p><b>Criterion 6.7: Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed in an environmentally appropriate manner at off-site locations.</b></p>	
<b>Indicator 6.7.a</b>	<p><i>For example, written procedures are in or attached to the management plan, meet or exceed legal requirements, and are followed.</i></p>
<p>Operational procedures for the proper management of all waste oil, filters, containers, litter, and other forms of waste created during harvest and other management operations are established and followed.</p>	
<b>Main Audit</b>	<p>No improper disposal of wastes was observed during the audit.</p>
<b>Indicator 6.7.b</b>	
<p>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>	
<b>Main Audit</b>	<p>Appropriate procedures are in place to ensure proper response to hazardous waste spills. No examples were available for review by the audit team.</p>
<b>Indicator 6.7.c</b>	<p><i>For example:</i></p>
<p>Waste materials are disposed of in a timely manner</p>	<ul style="list-style-type: none"> <li>• <i>Broken and leaking equipment and parts are repaired or removed from the forest; discarded parts are taken to a designated disposal facility.</i></li> </ul> <p><i>There is no evidence of waste materials on past operational sites</i></p>
<b>Main Audit</b>	<p>Appropriate procedures are in place to ensure proper response to hazardous waste spills. No examples were available for review by the audit team.</p>
<b>Indicator 6.7.d</b>	<p><i>For example, there is no evidence of ground- or surface-water contamination</i></p>
<p>Fuel tanks are located, and equipment is parked, outside of riparian management zones and away from sinkholes.</p>	
<b>Main Audit</b>	<p>All fuel storage on active operations was appropriately located.</p>
<b>Indicator 6.7.e</b>	<p><i>For example:</i></p>
<p>Employees and contractors are trained in the proper handling, storage, and disposal of chemicals, and</p>	<ul style="list-style-type: none"> <li>• <i>Training records for employees exist, and contracts contain clauses that require such training as required</i></li> </ul>

protective equipment is available and used.	<i>by the Federal Worker Protection Standards Law. Personal protective equipment and spill containment materials are available on all operational sites.</i>
<b>Main Audit</b>	Training of NFF staff was adequate to meet this requirement. Records were available for review. No provision is made for training of contract workers.
<b>Indicator 6.7.f</b>	<i>For example, disposal follows legal and/or label requirements</i>
Waste from on-site processing plants (e.g., portable sawmills, chippers) is disposed of according to legal or label requirements.	
<b>Main Audit</b>	Not applicable.
<b>Criterion 6.8:</b>	<b>Use of biological control agents shall be documented, minimised, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</b>
<i>Applicability note: Genetically improved organisms (e.g., Mendelian crossed) are not considered to be genetically modified organisms 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 <a href="http://fsc.org/fsc/whats_new/documents/Docs_cent/2">http://fsc.org/fsc/whats_new/documents/Docs_cent/2</a>.</i>	
<b>Indicator 6.8.a</b>	<i>For example:</i>
Biological controls are only used for pest problems, as part of integrated pest management (IPM) programs, and when the biological control agents, methods, and effects have been subjected to peer reviewed scientific research that demonstrates there are no significant negative impacts on native flora and fauna.	<ul style="list-style-type: none"> <li>• <i>Forest management records document the justification and use of biological control agents.</i></li> <li>• <i>Records include location, application rates, and weather conditions for each application.</i></li> <li>• <i>Only narrow-spectrum biological control agents are used.</i></li> </ul> <p><i>Exotic biological control agents are used only as a last resort and then only for the control of invasive exotic species.</i></p>
<b>Main Audit</b>	No examples of the use of biological controls were noted.
<b>Criterion 6.9:</b>	<b>The use of exotic species shall be controlled and actively monitored to avoid adverse ecological impacts</b>
<i>Applicability Note: For the Forest Certification Standard for the Southeastern United States, terrestrial exotic species are further defined as "Species not native or endemic to the Southeastern United States."</i>	
<b>Indicator 6.9.a</b>	
Exotic species (see Glossary) are not planted or otherwise introduced, with the possible exception of exotic biocontrol agents (see 6.8.a).	
<b>Main Audit</b>	No planting of exotic species was observed.
<b>Indicator 6.9.b</b>	
Planted exotic species are monitored to ensure they do not spread beyond their originally planted site (see 8.2.c). If they spread, control or eradication measures are taken.	
<b>Main Audit</b>	n/a

**Criterion 6.10:** Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:

- a) entails a very limited portion of the forest management unit; and
- b) does not occur on high conservation value forest areas; and
- c) will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.

**Indicator 6.10.a**

Primary, natural, and semi-natural stands are not converted to plantations. Degraded semi-natural stands can be converted to restoration plantations (see Glossary).

**Main Audit** No conversion to plantations is underway or planned.

**Criterion 6.11:**

**Invasive exotic species of plants should be eradicated from the property if biologically possible and economically feasible. Otherwise, invasive exotic species should be controlled to limit their expansion and ecological damage.**

*Note: Criterion 6.11 was added by the working group for the Southeastern U.S.*

*Applicability Note on "if biologically possible": Sometimes it is not biologically possible to eradicate an organism. For example, multi-million dollar efforts to eradicate hydrilla, melaleuca, kudzu, water hyacinth, and Brazilian pepper have proven that sometimes it is not possible to eradicate well-established invasive exotic species. Thus, in some cases, efforts can only reduce the species to an economically and ecologically acceptable threshold.*

**Indicator 6.11.a**

Periodic assessments for location and severity of invasive exotic species are carried out, including searches for new infestations of additional invasive species.

**Main Audit**

The NFF have a good program to identify and treat invasive exotic species. Additionally, according to William Simpson (logger) the NFF requires that logging equipment must be thoroughly cleaned of mud and any green vegetation prior to entering NFF property. This is a further attempt to limit the introduction of invasive exotic plant species.

Pg 3-31. Wildlife

Pg 3-23. Control of exotic plants

Have a program for the forest in Florida. Most of focus is on Cogon Grass. Jap. Climbing Fern is another major one. Region 8 Non-native invasive species strategy. Umbrella strategy for southeast. Reaching out to a lot of different funding sources.

RLRMP – Appendix C – Invasive Plants – pg C-3.

Field Evidence:

1. Saw several examples on all forests of invasive plant control. Plants included cogon grass, Japanese climbing fern, Camphor tree.
2. A Camphor tree site was found by boundary line crew. Crew has sufficient knowledge to identify exotics.
3. Re-routed fireline to prevent plowing through patch of Cogon Grass.
4. No exotic animals noted.
5. GIS layer with exotic plant locations. Over 1000 points in Apalach layer.

Cogon grass area marked out of sale - ANF-Wakulla site

**Indicator 6.11.b**

Locations of invasive exotic species are both described

and mapped in the management plan.	
<b>Main Audit</b>	See 6.11.a above
<b>Indicator 6.11.c</b>	<i>For example,</i>
The forest owners or managers specify measures to eradicate or control invasive exotic species and implement them in the field.	<i>Measures to control invasive exotic species are evident on site</i>
<b>Main Audit</b>	See 6.11.a above
<b>Indicator 6.11.d</b>	
Periodic monitoring is conducted to assess the effectiveness of the control measures, including the economic feasibility.	
<b>Main Audit</b>	See 6.11.a above
<b>PRINCIPLE 7: MANAGEMENT PLAN:</b>	
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.	
<b>Criterion 7.1:</b>	<b>The management plan and supporting documents shall provide:</b>
	<ul style="list-style-type: none"> <li>a) management objectives;</li> <li>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;</li> <li>c) rationale for rate of annual harvest and species selection;</li> <li>d) provisions for monitoring of forest growth and dynamics;</li> <li>e) environmental safeguards based on environmental assessments;</li> <li>f) plans for the identification and protection of rare, threatened and endangered species;</li> <li>g) maps describing the forest resource base including protected areas, planned management activities and land ownership;</li> <li>h) description and justification of harvesting techniques and equipment to be used.</li> </ul>
	<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.</i>
<b>Indicator 7.1.a</b>	
7.1.a.1. A written management plan is prepared that includes the landowner's short-term and long-term vision, goals, and objectives (ecological, silvicultural, social, and economic). The objectives are specific, achievable, and measurable. <i>Appropriate to the scale, intensity, and context of management</i> , the plan includes description and rationale for:	
<b>Silvicultural systems:</b>	
<ul style="list-style-type: none"> <li>• <i>Regeneration strategies</i></li> <li>• <i>Maintenance of structural and species diversity, including rare, threatened, and</i></li> </ul>	

<p><i>endangered species</i></p> <ul style="list-style-type: none"> <li>• <i>Pest control (disease, insects, invasive species, and vegetation)</i></li> <li>• <i>Soil and water conservation</i></li> <li>• <i>Methods and annual rates of harvest, by species and products</i></li> <li>• <i>Equipment and personnel needs</i></li> <li>• <i>Transportation systems</i></li> </ul> <p><b><i>Fire management:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Prescribed fires</i></li> <li>• <i>Wildfires</i></li> </ul> <p><b><i>Fish and wildlife and their habitats (including non-game species)</i></b></p> <p><b><i>Non-timber forest products:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Methods and annual rates of harvest, by species and products</i></li> <li>• <i>Regeneration strategies</i></li> </ul> <p><b><i>Socioeconomic issues:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Public access and use</i></li> <li>• <i>Conservation of historical and cultural resources</i></li> <li>• <i>Protection of aesthetic values</i></li> <li>• <i>Employee and contractor policies and procedures</i></li> <li>• <i>Community relations</i></li> <li>• <i>Stakeholder notification</i></li> <li>• <i>Public comment process</i></li> </ul> <p><b><i>Indigenous peoples' issues:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Protection of legal and customary rights</i></li> <li>• <i>Procedures for integrating tribal concerns into forest management</i></li> <li>• <i>Management of sites of special significance</i></li> </ul> <p><b><i>Special management areas:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Riparian management zones</i></li> <li>• <i>Set asides of sample representative ecosystems</i></li> <li>• <i>Protection of sensitive, rare, threatened, and endangered species</i></li> <li>• <i>Other conservation zones and/or ecologically sensitive features in the forest</i></li> </ul> <p><i>Landscape level analyses and strategies</i></p>	
<b>Main Audit</b>	The "Revised Land and Resource Management Plan for National Forests in Florida" (RLRMP) dated February 1999, as amended serves as the principal management planning document. This set of documents is publicly available at <a href="http://www.fs.fed.us/r8/florida/projects/">http://www.fs.fed.us/r8/florida/projects/</a> .
<b>DoD/DoE Indicator 7.1.a.1</b>	
The management objectives found in regional and /or site-specific plans for conservation, protections, and restoration, proposed by agencies, scientists, and/or stakeholders, are	

addressed in the forest management plan or supporting documents.	
<b>Main Audit</b>	This indicator is addressed by the RLRMP Section 2 – Forestwide Desired Future Conditions, Goals and Objectives.
<b>Indicator 7.1.b</b>	
Description of forest resources to be managed, environmental limitations, status of land use and ownership, socio-economic conditions, and a profile of adjacent lands	
<b>Main Audit</b>	This indicator is addressed by the RLRMP Preface and Section 1 – Introduction
7.1.b.1. Descriptions of the following forest resources at the stand level and summarized at the total forest level are included in the forest management plan:	
<ul style="list-style-type: none"> <li>• Acreage</li> <li>• Timber inventory</li> <li>• Forest type</li> <li>• Soil type</li> <li>• Natural communities</li> <li>• Water resources</li> <li>• Fragile and unique areas</li> <li>• Fish, wildlife, and their habitats</li> <li>• Harvested non-timber forest products (e.g., botanical and mycological)</li> <li>• Non-economic natural resources (e.g., ground cover)</li> </ul>	
<b>Main Audit</b>	This indicator is addressed by the RLRMP Section 2 – Forestwide Desired Future Conditions, Goals and Objectives and Section 4 – Management Area Goals...
7.1.b.2. A general description of the history, including ownership and use, of the forest management area is included in the forest management plan.	
<b>Main Audit</b>	This indicator is addressed by the RLRMP Preface and Section 1 – Introduction
7.1.b.3. A general description of landowner and the forest management area includes:	
<ul style="list-style-type: none"> <li>• the landowner's name and address;</li> <li>• socio-economic context and conditions of the forest management area;</li> <li>• other interests in the property (e.g., conservation easements, hunting leases, usufruct rights and treaty rights, mineral rights, utility rights of ways);</li> <li>• significant plans to change ownership status or size of the forest management area;</li> </ul>	
the location, size, environmental limitations, and legal description of the forest management area and a profile (including ownership and use) of adjacent lands.	
<b>Main Audit</b>	This indicator is addressed by the RLRMP Preface and Section 1 – Introduction

7.1.b.4. 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).	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – Heritage Resources, pg. 3.5, Lands pg. 3-8, Recreation pg. 3-14,
7.1.b.5. The management plan incorporates landscape-level considerations within the ownership and among adjacent and nearby lands, including major water bodies, critical habitats, and riparian corridors shared with adjacent ownerships.	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – Vegetation pg. 3-16, Watershed and Air pg 3-24, Wildlife and Fish pg. 3-26
<b>Indicator 7.1.c</b>	
Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – 7.0 Longleaf and Slash Pine Adaptive Management, pg. 4-37, 8.0 Sand Pine and Oak Scrub, pg. 4-43
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 6.3.a)	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – 7.0 Longleaf and Slash Pine Adaptive Management, pg. 4-37, 8.0 Sand Pine and Oak Scrub, pg. 4-43
7.1.c.2. Prescriptions are prepared prior to harvesting, site preparation, pest control, burning, and planting and are made available to people who carry out the prescriptions.	
<b>Main Audit</b>	Examples of the system for preparing prescriptions were reviewed. This system is guided and regulated by the requirements of the National Environmental Policy Act (NEPA). A description of how this process interacts with NFF planning can be found at <a href="http://www.fs.fed.us/r8/florida/projects/">http://www.fs.fed.us/r8/florida/projects/</a> .
<b>Indicator 7.1.d</b>	
<b>Rationale for the rate of annual harvest and species selection</b>	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – 7.0 Longleaf and Slash Pine Adaptive Management, pg. 4-37, 8.0 Sand Pine and Oak Scrub, pg. 4-43. Allowable cut calculation for the RLRMP is documented in the accompanying Environmental Impact Statement (EIS).
7.1.d.1. The management plan includes reliable data on growth, yield, stocking, and regeneration (see also 5.6.b).	



<b>Main Audit</b>	Guidelines for timber management in the RLRMP (section 3 – Vegetation) are based on the Record of Decision, Final Environmental Impact Statement for Vegetation Management in the Coastal Plain/Piedmont. Growth and stocking information is based on ongoing inventory data generated by permanent sample plots maintained by the Forest Inventory and Analysis (FIA) program. Field observations support the overall conclusion that criteria for timber management are generally conservative.
7.1.d.2. Species selection meets the economic goals and objectives of the forest owner or manager, while maintaining or improving the ecological composition and structure and functions of the forest.	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – 7.0 Longleaf and Slash Pine Adaptive Management, pg. 4-37, 8.0 Sand Pine and Oak Scrub, pg. 4-43. Management objectives are highly oriented towards longleaf restoration and sand/scrub habitat.
7.1.d.3. A time line that includes a schedule for program level forest management activities to be implemented over a five-year planning horizon is included in the forest management plan. Items to be addressed in the schedule include such activities as silviculture, monitoring, and assessment.	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – Section 5; Monitoring, evaluation, research and implementation, pg. 5-1.
<b>Indicator 7.1.e</b>	
<b>Provisions for monitoring forest growth and dynamics (see also Principle 8).</b> 7.1.e.1. Monitoring goals and objectives are stated in the management plan	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – Section 2, Forestwide desired future conditions, goals, and objectives, pg. 2-1
<b>Indicator 7.1.f</b>	
<b>Environmental safeguards based on environmental assessments.</b> 7.1.f.1. Written safeguards are based on the results of environmental assessments (see 5.3, 6.1 and 2, and 8.2.d).	
<b>Main Audit</b>	See reference to NEPA process in 7.1.c.2
<b>Indicator 7.1.g</b>	
<b>Plans for the identification and protection of rare, threatened, and endangered species.</b> Note: also see Criterion 6.3. 7.1.g.1. The management plan provides descriptions of activities for maintaining sensitive, rare, threatened, or endangered species and their habitat(s).	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – Section 3, Wildlife and Fish, proposed endangered threatened and sensitive species management, pg. 3-26.
<b>Indicator 7.1.h</b>	
<b>Maps describing the forest resource base,</b>	

<p><b>including protected areas, planned management activities, and land ownership.</b></p> <p>7.1.h.1. The management plan includes maps of the forest’s characteristics, such as:</p> <ul style="list-style-type: none"> <li>• relevant landscape-level factors;</li> <li>• property boundaries and roads;</li> <li>• timber production areas;</li> <li>• forest types by age and/or structure;</li> <li>• forest tracts mapped by community types;</li> <li>• topography;</li> <li>• soils, riparian zones (see Glossary) and springs and wetlands;</li> <li>• archaeological sites and cultural and customary use areas;</li> <li>• locations of and habitats for sensitive, rare, threatened, and endangered species; and designated High Conservation Value Forests.</li> </ul>	
<b>Main Audit</b>	The NFF has a very well developed GIS mapping system. A wide variety of appropriate and available data sources are utilized. Evidence of effective field application was evident.
<b>Indicator 7.1.i</b>	<i>Note: The working group considers this sub-criterion sufficiently explicit and measurable. Indicators are not required.</i>
Description and justification of harvesting techniques and equipment to be used (see also Criterion 6.5).	
<b>Main Audit</b>	This indicator is addressed by the RLRMP – Section 7.0 Longleaf and Slash Pine Adaptive Management, pg. 4-37, 8.0 Sand Pine and Oak Scrub, pg. 4-43. Site specific harvest plans and contract specification included appropriate levels of detail.
<p><b>Criterion 7.2: The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic considerations.</b></p>	
<b>Indicator 7.2.a</b>	
The management plan is current and is reviewed and revised as necessary (at least every five years to coincide with certification re-assessments) to accommodate new research findings and the observed effects of previous practices, as well as changes in the resource base.	
<b>Main Audit</b>	An active system of adaptation and amendment of the RLRMP was demonstrated. Cycle includes Management review, Environmental Assessment (EA) and Plan Amendment. Seven Plan amendments are on record. No revision to the management plan, however, has been contemplated to address major shortfalls in harvest scheduling (detailed in 5.1.c). See CAR 07.
<b>Indicator 7.2.b</b>	
Relevant provisions of the management plan are modified in response to detrimental environmental effects of illegal and/or unauthorized activities, as documented by monitoring (e.g., road damage, depletion of timber and non-timber resources).	
<b>Main Audit</b>	An active system of adaptation and amendment of the RLRMP was demonstrated. Cycle includes Management review, Environmental Assessment (EA) and Plan Amendment. Seven Plan amendments are on record.
<b>Indicator 7.2.c</b>	
Relevant provisions of the management plan are	

modified in response to changes in the forest due to unplanned disturbances (e.g. hurricanes, ice storms, floods, wildfire, pest outbreaks).	
--	--

<b>Main Audit</b>	Multiple examples of adaptive management were observed, demonstrating modification of planned actions in response to hurricanes and wildfires. Plan adaptations were in concert with overall objectives.
-------------------	--

<b>Criterion 7.3:</b>	<b>Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan</b>
<i>Note: The working group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i>	

<b>Main Audit</b>	Evidence indicates fully adequate training of NFF staff in the procedures and associated standards of the RLRMP. Provision for ensuring training of contract workers is not present.
-------------------	--

<b>Criterion 7.4:</b>	<b>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 above.</b>
<i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of timber volumes by species, timber quality, size and age class, marketing strategies, and other financial information) (see also Criterion 8.5).</i>	
<i>Note: The working group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i>	

<b>Main Audit</b>	All management plan documents are publicly available. This set of documents is available at <a href="http://www.fs.fed.us/r8/florida/projects/">http://www.fs.fed.us/r8/florida/projects/</a> .
-------------------	---

<b>PRINCIPLE 8: MONITORING AND EVALUATION:</b>
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.

<b>Criterion 8.1:</b>	<b>The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations as well as the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</b>
-----------------------	---

<b>Indicator 8.1.a</b>	
. Implementation and effectiveness of the management plan are periodically monitored to assess:	
<ul style="list-style-type: none"> <li>• The degree to which management the vision, goals, and objectives have been achieved;</li> <li>• Deviations from the management plan;</li> <li>• Unexpected effects of management activities;</li> <li>• Social and environmental effects of management activities.</li> </ul>	

<b>Main Audit</b>	Monitoring is conducted at all phases of management work to ensure compliance with policy and directives and objectives of the NFF Forest Plan. The primary document evidence is the 2005 Annual Monitoring and Evaluation Report for the national Forests in Florida. This was signed by Forest Supervisor Marsha Kearney on 10/3/2006. This report documents how closely the objectives of the Forest plan have been met. The 2005 monitoring report is a 5 year summary of monitoring efforts and the 2006 document was being prepared as this audit was being conducted.
	Documents and field evidence indicates that the NFF has an effective monitoring and evaluation program in place.
	The 2005 monitoring Report indicates that vegetation management objectives (e.g. thinning pine stands) have

	not been met and that it will be unlikely to be met with current and anticipated budgets. This is a deviation from the Forest Plan objectives and is the primary deviation found. The significance is that related outcomes such as improving habitat for Red-cockaded woodpeckers may not be met.
<b>Indicator 8.1.b</b>	
When sampling is needed, designs and procedures are clearly defined and provide results with levels of confidence appropriate to the scale and intensity of management.	
<b>Main Audit</b>	We found from documentation and field review that the NFF has a system in place to effectively monitor results. Stocking surveys for instance documented survival rates in planted stands of Longleaf Pine at 1 and 3 year intervals.
<b>Criterion 8.2:</b>	<b>Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</b> <ul style="list-style-type: none"> <li>▪ yield of all forest products harvested;</li> <li>▪ growth rates, regeneration and condition of the forest;</li> <li>▪ composition and observed changes in the flora and fauna;</li> <li>▪ environmental and social impacts of harvesting and other operations;</li> <li>▪ costs, productivity, and efficiency of forest management.</li> </ul>
<b>Indicator 8.2.a</b>	
<b>Yield of all forest products harvested</b>	
8.2.a.1. Forest owners or managers maintain records of standing timber and timber harvest volumes by species, volume, and product class (e.g., saw timber, chip and saw, and pulp wood).	
<b>Main Audit</b>	Evidence was found in timber sale folders and inventory records that indicate the NFF has adequate documentation. Field reviews on active and ongoing harvests such as Compartment 220 of the ANF confirmed this.
8.2.a.2. Forest owners or managers maintain records of the yield of harvested non-timber forest products	
<b>Main Audit</b>	The NFF has a system in place to record the yield of harvested non-timber products such as firewood, moss and pine straw. An example is Table 38 of the 2005 Monitoring Report.
8.2.a.3. Significant, unanticipated removal of forest products (e.g., theft and poaching) is monitored and recorded.	
<b>Main Audit</b>	We reviewed a timber sale administrator report which documented the actions taken when several trees were illegally cut by an operator and the steps taken to correct the problem. This was ANF Compartment 99, Stand 3, unit 7.
<b>Indicator 8.2.b</b>	
<b>Growth rates, regeneration, and condition of the forest</b>	
8.2.b.1. Species composition, regeneration, growth rates, stocking, stand structure, and age-class distribution are monitored and recorded through a forest inventory system that includes: <ul style="list-style-type: none"> <li>• Growth and mortality rates of the dominant and/or important species are estimated for each forest and site type.</li> <li>• Stand structure and composition are monitored periodically by estimating the</li> </ul>	

<p>number of trees in each age or size class by species or species group.</p> <ul style="list-style-type: none"> <li>• The number of stems per acre of regeneration is estimated, by species or species group.</li> <li>• The impacts of natural disturbances (e.g., disease, wind, fire, damage by insects and/or mammals) are periodically monitored.</li> <li>• Stands are monitored to assess their vulnerability to natural disturbances.</li> </ul>	
<b>Main Audit</b>	We found that the NFF has an inventory system in place. This inventory is used to help prepare management prescriptions for timber harvesting, prescribed fire and wildlife management. We observed salvage operations on the OCA NF in Sand Pine that integrated harvesting and Florida Scrub Jay habitat management.
<p><b>Indicator 8.2.c</b></p> <p><b>Composition and observed changes in the flora and fauna</b></p> <p>8.2.c.1. Forest owners or managers periodically monitor the forest for changes in major habitat elements; in the occurrence of sensitive, rare, threatened, or endangered species; and of invasive exotic species.</p>	
<b>Main Audit</b>	The NFF have trained biologists, botanists, ecologists and silviculturist who can identify rare plants or wildlife species and invasive plants. Field visits to Compartment 13 and 106 on the ANF confirmed that managers were aware of both threatened and invasive species and actions to take in managing them. The NFF has a system to download overlays of invasive plants on GPS units and Silviculturist Gary Hegg demonstrated this application. Gary Hegg and other staff were knowledgeable about Japanese climbing fern and Cogon grass as demonstrated by site reviews in ANF Compartment 13 and 106. AFMO Mike Drayton showed Camphor Tree eradication on OCA Compartment 61. We found evidence of cross training in invasive species and threatened species protection with fire and other staff.
<p><b>Indicator 8.2.d</b></p> <p><b>Environmental and social impacts of harvesting and other operations</b></p> <p>8.2.d.1. The environmental impacts of site-disturbing activities are assessed after their completion.</p>	<p><i>Examples include impacts on:</i></p> <ul style="list-style-type: none"> <li>• residual trees</li> <li>• ground cover</li> <li>• regeneration</li> <li>• wildlife habitat</li> <li>• wetland hydrology</li> <li>• water quality and quantity</li> <li>• soil compaction, structure, and fertility</li> <li>• native communities/ecosystems</li> <li>• biodiversity</li> <li>• fragmentation</li> </ul>
<b>Main Audit</b>	The silviculturist and foresters have a system in place to ensure adequate regeneration and protection of other values. The silviculturist, TMA and TSA are certified and demonstrated awareness of the standards and guidelines of the forest plan and specific timber sale contract clauses. Tommy Spencer TMA OSC Compartment 4 stand 11.
8.2.d.2. A monitoring program is in place to assess the condition of and the environmental impacts of the forest road system.	
<b>Main Audit</b>	The NFF have systems that classify roads and maintenance levels.
8.2.d.3. Creation and/or maintenance of local jobs and public responses to management activities are documented.	

<b>Main Audit</b>	Timber harvests have Environmental Analyses clearly show public involvement in the decision making process. Examples include ANF Compartment 4 Stand 22.  Local jobs for a variety of contractors occur because of NFF management and maintenance activities.
8.2.d.4. On tribal lands, management of sites of special significance (see indicators 3.2 and 3.3) is jointly monitored with tribal representatives to determine the adequacy of management prescriptions.	
<b>Main Audit</b>	n/a
<b>Indicator 8.2.e</b>	
<b>Costs, productivity, and efficiency of forest management</b>	
8.2.e.1. Forest owners or managers monitor the costs of and revenues from management activities in order to assess forest productivity and efficiency over the long term.	
<b>Main Audit</b>	The NFF has an accounting system in place to monitor costs and revenues. Estimated revenues and costs are part of the environmental analysis conducted prior to a sale. The 2005 Monitoring Report has examples of receipts in Table 35.
<b>Criterion 8.3:</b>	<b>Documentation shall be provided by the forest manager to enable monitoring and certifying organisations to trace each forest product from its origin, a process known as the “chain of custody.”</b>
<b>Indicator 8.3.a</b>	
While certified forest products are in the landowner or manager’s possession, they are clearly identified through marks or labels and/or stored separately from non-certified products.	
<b>Main Audit</b>	n/a The NFF is not currently a “certified” forest through FSC/SFI or other certifying body.
<b>Criterion 8.4:</b>	<b>The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b>
<b>Indicator 8.4.a</b>	
Information is collected through monitoring to enable adjustment of management plans and strategies. Deficiencies in information are identified and procedures initiated to remedy them.	
<b>Main Audit</b>	The NFF Forest Plan indicates that it will use annual monitoring reports to help prepare revised NFF Forest plans. The 2005 Monitoring report on page 3 certifies this will be done using “action plans” to respond to recommendations in the Monitoring Plan.
<b>Indicator 8.4.b</b>	
Discrepancies between outcomes (i.e., yields, growth, ecological changes) and expectations (i.e., plans, projections, anticipated impacts) are appraised and taken into account in the subsequent management plan.	

<b>Main Audit</b>	We found specific evidence that the NFF used the Monitoring Reports to revise the Forest Plan throughout the 2005 Monitoring Report and especially on pages 90-91. Forest Plan amendments were prepared to respond to changes. Another example is an ongoing effort to address OHV issues on the NFF. No revision to the management plan, however, has been contemplated to address major shortfalls in harvest scheduling (detailed in 5.1.c). See CAR 07.
-------------------	---

<b>Criterion 8.5:</b>	<b>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.</b>
	<i>Applicability Note: Owners and managers of private forests may withhold proprietary information (e.g., timber volumes by size and age class, marketing strategies, and other financial information).</i>

<b>Indicator 8.5.a</b>	
An up-to-date summary of monitoring information is maintained and is available upon request at either no cost or at a reasonable price.	

<b>Main Audit</b>	Annual monitoring plans were available to the public upon request and at the NFF Website. <a href="http://www.fs.fed.us/r8/florida/projects/documents/forest_plan/forest_plan.shtml">http://www.fs.fed.us/r8/florida/projects/documents/forest_plan/forest_plan.shtml</a>
-------------------	---

**PRINCIPLE 9: MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS:**

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

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

- Forest areas containing globally, regionally, or nationally significant concentrations of biodiversity values (e.g., endemism, endangered species, refugia) and/or large, landscape-level forests that are either contained within the management unit or contain the management unit, wherein viable populations of most, if not all, naturally occurring species exist in natural patterns of distribution and abundance;
- Forest areas that are in or contain rare, threatened or endangered ecosystems;
- Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control); see Glossary for definition of Critical Situations.
- Forest areas that are 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).
- Forests that fall under the definition of primary ("old-growth") and natural forests (see Glossary), as defined in the Forest Certification Standard for the Southeastern United States

<b>Criterion 9.1:</b>	<b>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</b>
	<i>Applicability Note: Small landowners 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 landowners and/or those who practice more intensive forest management.</i>

<b>Indicator 9.1.a</b>	
Attributes and locations of High Conservation Value Forests (HCVF) are determined (in consultation with stakeholders and scientists) by:	
(1) Identification of globally scaled HCVF attributes that are present in the forest;	
(2) Identification and description of regionally and locally scaled HCVF attributes and areas that are in the landscape and/or certified forest;	

(3) Delineation by maps and habitat descriptions.	
<b>Main Audit</b>	NFF does not conduct analysis according to FSC-specific HCVF criteria. Evidence indicates contribution to “Guidance for Conserving and Restoring Old-Growth Forest Communities on NF in the Southern Region”. NFF personnel submit areas to be included this process.  RLRMP Section 3 - Old Growth 3-23 and Chapter 4. Objective 20 pg 2-6.
<p><b>Criterion 9.2: The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</b></p> <p><i>Note: FSC understands that Criterion 9.2 is an instruction to FSC –accredited certification bodies and that no indicators are required.</i></p>	
<b>Main Audit</b>	Stakeholder Consultation places appropriate emphasis. See Stakeholder consultation in this report.
<p><b>Criterion 9.3: The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</b></p> <p><i>Applicability Note: The applicability of the precautionary principle and the consequent flexibility of forest management vary with the size, configuration, and tenure of the HCVF:</i></p> <p><i>a) <u>More flexibility</u> is appropriate where HCVF 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><i>b) <u>Less flexibility</u> is appropriate where HCVF is more intact, covers a smaller area, has a smaller area-to-perimeter ratio, and future tenure is uncertain based on social considerations, and is consistent with Principle 3.</i></p> <p>In forests that take on the characteristics of a primary (“old-growth”) forest (see Glossary) as a result of management practices, harvesting is permitted, provided HCVF characteristics are maintained.</p>	
<b>Indicator 9.3.a</b>	
In intact old-growth forests (see Glossary) and unentered old-growth stands (see Glossary), the precautionary principle requires that no active management is conducted unless it is ecologically necessary to maintain or enhance HCVF values, which includes old-growth attributes.	
<b>Main Audit</b>	Evidence does not indicate the presence of intact old-growth forests. Strong precautionary principal concepts are embedded in site evaluation and planning. Significant areas with old growth characteristics (e.g. MA 5.1) are managed in a reserve status without active management.
<b>Indicator 9.3.b</b>	
Management of HCVFs maintains or enhances their defining characteristics, their extent, and is implemented according to the management plan. A summary of the management activities planned for these forests is included in the publicly available summary of the management plan (see 7.4.1).	
<b>Main Audit</b>	Management of large portions of the NFF principally for HCVF characteristics includes burning programs and group selection cutting methods which both enhance the forest characteristics.
<b>Indicator 9.3.c</b>	
Forest owners or managers of HCVFs (forests and/or stands) coordinate conservation efforts	



with owners and managers of other HCVPs within their landscape.	
<b>Main Audit</b>	Examples of collaboration with adjacent (FL state) landowners for some management activities, particularly burning, designed to enhance HCVP characteristics were observed.
<b>Indicator 9.3.d</b>	
Conservation zones are established to protect and/or maintain all managed, HCV old-growth forests (see Glossary). In these forests, the precautionary principle requires that no active management is conducted unless it is ecologically acceptable and maintains or enhances HCVP values. Management of the conservation zones is described in the management plan and their locations are mapped.	
<b>Main Audit</b>	Examples of this includes the buffers on flatwoods salamander ponds and RCW clusters, and a no-cut policy for hardwood areas. Broad management strategies over management zones also are designed to enhance HCVP attributes (e.g RCW habitat)
<p><b>Criterion 9.4: Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</b></p> <p><i>Note: The working group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i></p>	
<b>Main Audit</b>	See Objective 8.
<p><b>PRINCIPLE 10: PLANTATIONS:</b></p> <p>Plantations shall be planned and managed in accordance with Principles and Criteria 1 - 9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</p> <p><i>Applicability Note: See Appendices 3 and 4 for summary and clarification of concerns about and positions on plantation management (Appendix 3) and the conversion of natural forests to plantations (Appendix 4).</i></p>	
<p><b>Criterion 10.1: The management objectives of the plantation, including natural forest conversion and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.</b></p>	
<b>Indicator 10.1.a</b>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• Objectives and justification for establishing a plantation are included in the management plan.</li> <li>• Commercial and restoration plantations are each identified in the management plan.</li> <li>• Planned management practices and rotation age are identified for each plantation.</li> </ul>
The forest management plan contains sections specific to the objectives and management of each plantation. See Applicability note under 7.1.	
<b>Main Audit</b>	The RLRMP contains detailed management objectives as well as standards and guidelines to regulate practice for all Management Areas, including those employing plantation techniques. Site specific harvest and regeneration plans are also available for each treated stand. Examples reviewed were found to be complete and thorough.
<b>DoD/DoE Indicator 10.1.1</b>	

<p>If the forest contains plantations on soils capable of supporting natural forests, then the management plan or supporting documents include a strategy and implementation plan for restoring the plantations to managed natural forest conditions. Implementation of the strategy is being undertaken in the near term (e.g. within five years).</p>	
<p><b>Main Audit</b></p>	<p>All active planting operations undertaken by NFF are for habitat restoration programs. These include replacement of “off site” slash pine on native longleaf pine sites, and direct seeding of sand pine on appropriate sites. Stand management standards for all commercial types employ techniques (e.g. vegetation management, stocking criteria, etc.) designed to restore structures and characteristics of natural stands.</p>
<p><b>Criterion 10.2:</b>      <b>The design and layout of plantations should promote the protection, restoration and conservation of natural forests, and not increase pressures on natural forests. Wildlife corridors, streamside zones and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the plantation, consistent with the scale of the operation. The scale and layout of plantation blocks shall be consistent with the patterns of forest stands within the natural landscape.</b></p>	
<p><b>Indicator 10.2.a</b></p>	
<p>Plantation establishment does not replace, endanger, or otherwise diminish the ecological integrity of any existing primary, natural, or semi-natural forests (see Glossary) on the property. Commercial plantations (as opposed to those for restoration; see Glossary) can be established on the following sites: former plantations; abandoned agricultural lands; non-forested lands that were historically forested; and forest sites lacking most of the native forest ecosystem components, such as native ground cover (see 6.10 and 10.9; see Glossary).</p>	
<p><b>Main Audit</b></p>	<p>Objectives of tree planting programs are clearly focus on enhancing and/or restoring ecological integrity.</p>
<p><b>Indicator 10.2.b</b></p>	<p><b>Verifiers &amp; Guidance:</b></p>
<p>Primary, natural, and semi-natural forests are not converted to commercial plantations.</p>	
<p><b>Main Audit</b></p>	<p>No evidence of such conversion is found in either planning or field observations.</p>
<p><b>Indicator 10.2.c</b></p>	<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Plantation boundaries follow land contours and, wherever possible, avoid intersecting stream channels and hillsides with straight lines.</i></li> <li>• <i>Plantations are established in a way that supports functional habitat for native flora and fauna.</i></li> <li>• <i>All provisions for streamside management zones are applied in the establishment of plantations.</i></li> <li>• <i>Wildlife corridors that connect natural or secondary forests are designed to be functional.</i></li> </ul>
<p><b>Main Audit</b></p>	<p>Overall scale of plantations is small in context. Large even-aged stands in the ONF are designed specifically for scrub habitat objectives.</p>
<p><b>Indicator 10.2.d</b></p>	
<p>The design and layout of restoration plantations move the stand to recover most of the principle</p>	

characteristics of the target native ecosystem described in the restoration objectives.		
<b>Main Audit</b>	All planted stands on the NFF follow this indicator closely.	
<b>Indicator 10.2.e</b>	<i>Note: Credible scientific analyses are defined as scientific opinions supported by data and explanations in articles published in peer-reviewed professional journals that deal with the natural or social sciences and judged to be relevant to the matter in question. Scientific credibility, as it applies to this criterion, is, based on a body of scientific work and on the judgment of experienced professionals.</i>	
	On areas already converted to plantations, even-aged harvests lacking within-stand retention are limited to forty acres or less in size, unless a larger opening can be justified by scientifically credible analyses.	
<b>Main Audit</b>	Average size of clearcuts on the NFF is 55 acres. However, this includes intentionally large scrub restoration opening on the ONF. Stands observed that approach the FSC definition for plantation were all much less than 40 acres in size.	
<b>Indicator 10.2.f</b>		
	Harvest units are arranged to support viable populations of native species of flora and fauna. For <i>hardwood</i> ecosystems, regeneration in previously harvested areas reaches a mean height of at least ten feet or achieves canopy closure before adjacent areas are harvested. For <i>southern pine</i> ecosystems, (e.g. upland pine forests, pine flatwoods forests, sand pine scrub), harvest areas are located, if possible, adjacent to the next youngest stand to enable early succession or groundcover-adapted species to migrate across the early successional continuum.	
<b>Main Audit</b>	No even-aged management of hardwood systems in underway. For pine systems, regeneration harvests over most of the NFF are occurring at a very low intensity, which makes intentional adjacently management, as described here, impractical over most of the landscape. On the ONF, examples of intentional landscape-level management of early successional habitat is clearly evident and appears successful.	
<b>Criterion 10.3:</b>	<b>Diversity in the composition of plantations is preferred, so as to enhance economic, ecological and social stability. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes and structures.</b>	
<b>Indicator 10.3.a</b>	<i>For example:</i>	
	Forests containing plantations are managed to create and maintain structural and species diversity that results in viable wildlife habitat and long-term soil maintenance and replenishment.	<ul style="list-style-type: none"> <li>• <i>Thinning provides light to the forest floor that enhances the diversity of understory species.</i></li> </ul> <i>Prescribed burning promotes the diversity of groundcover</i>
<b>Main Audit</b>	Group selection and commercial thinning systems in longleaf pine stands are clearly designed to enhance diversity and habitat quality.	
<b>Indicator 10.3.b</b>	<i>For example, the frequency, seasonality, and intensity of burning are such that native fauna and flora are promoted and the dominant tree species protected.</i>	
	Prescribed burning is periodically carried out in plantations of fire-tolerant species (e.g., loblolly, slash, shortleaf, and longleaf pines) to promote forest health and species diversity.	
<b>Main Audit</b>	The NFF has implemented an ambitious and noteworthy program of prescribed fire. The Annual Monitoring Report, section 1.8 indicates an average of 158,233 acres burned annually from 2003 to 2005.	
<b>Indicator 10.3.c</b>		
	Plantation management activities are planned to	

generate and maintain opportunities for employment over the long term.		
<b>Main Audit</b>	The small scale of these operations represents only a small portion of overall employment opportunities from the NFF.	
<p><b>Criterion 10.4:</b>     <b>The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives. In order to enhance the conservation of biological diversity, native species are preferred over exotic species in the establishment of plantations and the restoration of degraded ecosystems. Exotic species, which shall be used only when their performance is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.</b></p>		
<b>Indicator 10.4.a</b>		<p><i>For example:</i></p> <ul style="list-style-type: none"> <li><i>The selection of hardwood and/or conifer species is based on ecological and economic criteria compatible with the landowner's management objectives and published guidelines for species selection.</i></li> </ul> <p><i>Planting stock is selected based on the best information available relative to genetics and seed source.</i></p>
Species, planting stock, and seed sources are appropriate for the site based on ecological and economic criteria compatible with the landowner's management objectives and published guidelines for species selection. (see also 6.3).		
<b>Main Audit</b>	Current sources of planting stock rely on a combination of long-established, well researched, and locally-sourced resources, and ongoing field collections. All field collections are local. No use of biotechnology has been employed or is planned.	
<b>Indicator 10.4.b</b>		
Only native species (see Glossary) are used to establish or re-establish tree plantations.		
<b>Main Audit</b>	Most planting is with longleaf and sand pine, both native and from local genetic stock. A small amount of native slash pine is planted on appropriate sites.	
<p><b>Criterion 10.5:</b>     <b>A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.</b></p> <p><i>Applicability Note: The forest management area is defined as the portion of total property being assessed for certification (e.g., agricultural land is not included).</i></p> <p><i>Protected forest areas may be included as part of the natural forest cover required to be maintained or restored. A forest management area that has more than these minimum designated percentages in natural or semi-natural forests, may not convert these areas to plantations (see 6.3.a.8)</i></p>		
<b>Indicator 10.5.a</b>		<p><i>For example, restoration plans are included in the management plan.</i></p>
<p>A percentage of the total forest management area is maintained as and/or restored to natural and semi-natural forest cover. The minimum required percentage are:</p> <ul style="list-style-type: none"> <li>for 100 acres or less, at least 10 percent.</li> <li>for 101 - 1,000 acres, at least 15 percent.</li> <li>for 1,001 to 10,000 acres, at least 20 percent.</li> <li>for &gt; 10,000 acres, at least 25 percent</li> </ul>		
<b>Main Audit</b>	Essentially all of the NFF acreage is being maintained and/or restored to natural or semi-natural forest cover.	
<b>Indicator 10.5.b</b>		<p><i>For example:</i></p> <ul style="list-style-type: none"> <li><i>Forest owners or managers designate site(s) for natural forest maintenance and restoration.</i></li> <li><i>The management plan includes a prescription for restoring and maintaining these sites.</i></li> </ul>
Areas of forest and/or plantation to be maintained in and/or restored to natural conditions are chosen through a landscape analysis that focuses on enhancing ecological integrity and habitat		

connectivity.		
<b>Main Audit</b>	Essentially all of the NFF acreage is being maintained and/or restored to natural or semi-natural forest cover.	
<b>Indicator 10.5.c</b>		
The areas of natural forest cover to be maintained or restored are identified on the ownership map.		
<b>Main Audit</b>	Essentially all of the NFF acreage is being maintained and/or restored to natural or semi-natural forest cover.	
<b>Indicator 10.5.d</b>		
Areas of forest and/or plantation to be maintained as natural or semi-natural forests are managed to provide the diversity of community types, wildlife habitats, and ecological functions native to the site.		
<b>Main Audit</b>	Essentially all of the NFF acreage is being maintained and/or restored to natural or semi-natural forest cover.	
<p><b>Criterion 10.6: Measures shall be taken to maintain or improve soil structure, fertility and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns</b></p> <p><i>Note: see criterion 6.5 and its indicators.</i></p>		
<b>Indicator 10.6.a</b>		<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>The decision to use fire, mechanical, or chemical site preparation methods for plantation establishment is made based on terrain, soil conditions, native ground cover, intensity of vegetative competition, anticipated response of the planted trees, and is justified in the forest management plan.</i></li> <li>• <i>Mechanical site preparation is done with the minimal soil movement necessary to achieve the planned site preparation objectives and in accordance with Best Management Practices (see 6.5).</i></li> <li>• <i>Chemical site preparation is conducted following a prescription consistent with the methodology of integrated pest management (see 6.6).</i></li> <li>• <i>Non-target areas are minimally disturbed by machine damage, movement of sediment, or drifting herbicides.</i></li> <li>• <i>Intensive site preparation such as windrowing and/or bedding, are used only when absolutely necessary and justified.</i></li> </ul>
Site preparation on commercial plantations is conducted according to the management plan while balancing economic and environmental concerns (see 6.5). Methods are used that encourage survival of regeneration and improve yields while conserving the environmental integrity (e.g., ground cover, hydrology, nutrient cycles) of the site.		
<b>Main Audit</b>	Site preparation is utilized on a small portion of harvested sites on the NFF. All observed sites displayed very low site impacts.	
<b>Indicator 10.6.b</b>		<p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>The decision to use hand or machine planting is based on slope, soil conditions, amount of debris on the site, local experience, cost, and available labor and is justified in the management plan.</i></li> <li>• <i>Planting tools and equipment are selected to avoid soil damage while benefiting seedling survival.</i></li> <li>• <i>Recently established plantations have no evidence of soil erosion channels that originated in planting rows.</i></li> <li>• <i>On slopes greater than five percent, tree planting with a furrow type machine is/was done on the contour.</i></li> </ul>
Tree planting minimizes soil damage while maximizing seedling survival		

	<ul style="list-style-type: none"> <li>• <i>There is no evidence of on-site soil erosion or sedimentation of waterways.</i></li> <li>• <i>The planting surface is sufficiently clear to allow planting in mineral soil.</i></li> </ul>
<b>Main Audit</b>	No significant soil disturbance or damage was observed on planting sites.
<b>Indicator 10.6.c</b>	<i>For example:</i>
Thinning is implemented according to the management plan and state or regional BMPs and published guidelines in a fashion that avoids site disturbance and damage to the residual stand.	<ul style="list-style-type: none"> <li>• <i>Slash and other debris are left dispersed in the stand, when possible.</i></li> <li>• <i>Thinning is avoided during wet soil conditions and/or specialized equipment is used to minimize impact.</i></li> <li>• <i>Appropriate equipment and harvesting procedures are used.</i></li> <li>• <i>Damage to residual trees is minimal.</i></li> <li>• <i>There is no evidence of on-site erosion or sedimentation of waterways.</i></li> </ul>
<b>Main Audit</b>	A variety of commercial thinning sites were inspected, including several active operations. Site impacts, both to soils and residual stand were uniformly low. Quality control criteria were demonstrated to be effective in minimizing site impacts.
<b>Indicator 10.6.d</b>	<i>For example:</i>
Fertilizer is applied only when justified by soil type, soil or foliar analysis, indicator plant species from the plantation, and/or scientific literature; when it improves the general nutrient balance of the site; when it is economically justified; and when adverse on- or off-site environmental impacts are minimal. If used, a prescription for fertilizer application is followed.	<ul style="list-style-type: none"> <li>• <i>Soil classification or foliar analysis from the plantation indicates one or more nutrients have limited crop productivity.</i></li> <li>• <i>Fertilizer is applied according to a prescription and application records are on file.</i></li> <li>• <i>Data or scientific literature confirms that the response to fertilization is economically justified.</i></li> <li>• <i>If fertilizer is used, there is no runoff or leaching of the fertilizer into inherently low-nutrient systems, such as pitcher plant bogs and other such nutrient limited ecosystems.</i></li> </ul>
<b>Main Audit</b>	NFF is conducting no fertilization.
<b>Criterion 10.7:</b> <b>Measures shall be taken to prevent and minimise outbreaks of pests, diseases, fire and invasive plant introductions. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilisers. Plantation management should make every effort to move away from chemical pesticides and fertilisers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7.</b>	
<b>Indicator 10.7.a</b>	<i>For example:</i>
Plantation vigor and growth is maintained and monitored to prevent outbreaks of pests and diseases.	<ul style="list-style-type: none"> <li>• <i>Periodic inventories measure survival and growth rates (see 8.2).</i></li> <li>• <i>Silvicultural practices, such as thinning and harvesting, are scheduled and conducted to maintain plantation vigor and health.</i></li> <li>• <i>The landowner or manager is aware of the more significant potential pest problems typical for the plantation species and region, and has some knowledge of control procedures.</i></li> <li>• <i>Pest (e.g., insects, disease, animals, invasive species) surveys or observations are periodically conducted (see 8.2).</i></li> </ul>
<b>Main Audit</b>	The RLRMP includes significant planning for commercial thinning of existing plantations of slash and longleaf pine, to improve and maintain vigor and health, as well as enhance habitat qualities (RLRMP Section 4, Mgmt Area Goals etc.). Monitoring reports indicate, however, that the NFF is falling consistently short of these stand

	treatment targets. This shortfall may be creating significant threats to overall forest health. See CAR 09.
<b>Indicator 10.7.b</b>	<i>For example:</i>
A strategy is in place to prevent and control wildfire.	<p><i>Natural breaks and/or fire lanes are present and functional.</i></p> <p><i>Periodic prescribed burning keeps plantation fuel loads low.</i></p> <p><i>Personnel are adequately trained and are aware of available assistance.</i></p>
<b>Main Audit</b>	An extensive staff infrastructure is devoted to the use and control of fire. Interviews and field observations indicate that NFF plays a leading role in the regional prevention and control of wildfire.
<b>Indicator 10.7.c</b>	<i>For example:</i>
Invasive exotic plant species (see Glossary) are kept out of plantations and treated as described in 6.11. Otherwise, invasive exotic species are controlled to limit their expansion and ecological damage.	<ul style="list-style-type: none"> <li>• <i>Populations of invasive exotic plants in plantations are controlled, minimized, or eliminated.</i></li> <li>• <i>Records of efforts to control invasive exotic species are on file.</i></li> </ul>
<b>Main Audit</b>	See Criteria 6.9
<b>Criterion 10.8:</b>	<b>Appropriate to the scale and diversity of the operation, monitoring of plantations, shall include regular evaluation of potential on-site and off-site impacts, (e.g. natural regeneration, effects on water resources and soil fertility, and impacts on local welfare and social well-being), in addition to those elements addressed in principles 8, 6 and 4. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access.</b>
<b>Indicator 10.8.a</b>	
Monitoring of the impacts of plantations, both on and off-site, is conducted in the same manner as the monitoring of natural forests, in accordance with Principles 4, 6, and 8.	
<b>Main Audit</b>	See criteria 8.1 – 8.5
<b>Criterion 10.9:</b>	<b>Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification. Certification may be allowed in circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly of such conversion.</b>
	<i>Applicability Note: The vast majority of landowners and managers in the Southeast United States have very little awareness of FSC and its Principles and Criteria. At the same time most landowners have been exposed to the prevailing ethos of plantation forest conversion and management. The exception to Criterion 10.9 embodied in Indicator 10.9.a is designed to deal realistically with plantations so as to encourage their restoration and a management approach that is more ecologically based, and to avoid having an owner or manager denied certification for something that occurred because of their lack of awareness or access to information. Indicator 10.9.1 allows landowners who have converted stands after 1993 to qualify for certification if they can demonstrate that they are actively pursuing restoration of the converted stand(s) toward natural forest conditions</i>
<b>Indicator 10.9.a</b>	<i>Note: Principle 10 was approved by the international FSC membership in November 1994. See Appendix C for further information on the Southeast Working Group's position on plantations and plantation management.</i>
Plantation stands established through conversion between 1994 and 2001 may be considered for certification if a restoration plan covering all such stands is being implemented. Examples of activities that are carried out in restoration plantations include:	

<ul style="list-style-type: none"> <li>• Modification of the management plan from commercial to restoration;</li> <li>• Enrichment plantings of native species;</li> <li>• Management of soils and coarse woody debris to restore or enhance soil fertility;</li> <li>• Restoration and/or enhancement of native wildlife habitats;</li> <li>• Restoration and/or enhancement of structural diversity (see Glossary), by recruiting mid-story and/or understory components;</li> <li>• Control of unwanted vegetation is limited to levels that allow restoration of native species;</li> <li>• Restoration of the fire regime common to natural stands is implemented.”</li> </ul>	
<b>Main Audit</b>	All of NFF planting operations conform to restoration criteria.
<b>Indicator 10.9.b</b>	<b>Verifiers &amp; Guidance:</b>
If the plantation was converted since November 1994, there is adequate evidence that the current manager/owner was not responsible	Legal evidence of ownership or use-right
<b>Main Audit</b>	Not applicable

**End of Report**