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

California Polytechnic State University Corporation

Swanton Pacific Ranch

Santa Cruz Count, CA

SCS-FM/COC-00071N

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Davenport, CA 95017
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spranch.org

CERTIFIED	EXPIRATION
2 May 2014	1 May 2019

DATE OF FIELD AUDIT
18 - 19 March 2014
DATE OF LAST UPDATE
12 June 2014

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Foreword

SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as "well managed," thereby permitting the FME's use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (http://info.fsc.org/) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Certificate Registration Information

1.1.1.a Name and Contact Information

Organization name	California Polytechnic State University Corporation, Swanton Pacific Ranch		
Contact person	Steve Auten		
Address	Swanton Pacific Ranch 125 Swanton Road Davenport, CA 95017 USA	**Telephone**	831-458-5413
		Fax	831-458-5411
		e-mail	sauten@calpoly.edu
		Website	spranch.org

1.1.1.b FSC Sales Information

☒ *FSC Sales contact information same as above.*			
FSC salesperson			
Address		**Telephone**	
		Fax	
		e-mail	
		Website	

1.1.2 Scope of Certificate

Certificate Type	☒ Single FMU	☐ Multiple FMU
	☐ Group	
SLIMF (*if applicable*)	☒ Small SLIMF certificate	☐ Low intensity SLIMF certificate
	☐ Group SLIMF certificate	
# Group Members (*if applicable*)	1	
Number of FMU's in scope of certificate		
Geographic location of non-SLIMF FMU(s)	*Latitude: 37° 1' 59.5128"* *Longitude: -122° 13' 10.0524"*	
Forest zone	☐ Boreal	☒ Temperate
	☐ Subtropical	☐ Tropical
Total forest area in scope of certificate which is:	**Units: ☐ ha or ☒ ac**	
privately managed	2,100 acres	
state managed		
community managed		
Number of FMUs in scope that are:		

less than 100 ha in area		100 - 1000 ha in area	1
1000 - 10 000 ha in area		more than 10 000 ha in area	

Total forest area in scope of certificate which is included in FMUs that: **Units: ☐ ha or ☒ ac**	
are less than 100 ha in area	
are between 100 ha and 1000 ha in area	2,100
meet the eligibility criteria as *low intensity* SLIMF FMUs	

Division of FMUs into manageable units:

SPR is divided under two main management units, each covered by a separate NTMP: Swanton Pacific Ranch and Valencia Creek. Within SPR there are two larger management units (Scotts Creek and Little Creek) with the remaining stands in scattered satellite units. The Valencia Creek NTMP divides the property into Management Units 1, 2 and 3.

1.2 FSC Data Request

1.2.1 Production Forests

Timber Forest Products	**Units: ☐ ha or ☒ ac**
Total area of production forest (i.e. forest from which timber may be harvested)	1,182 acres
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	1,182 acres
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	1,182 acres
Silvicultural system(s)	**Area under type of management**
Even-aged management	0
Clearcut (clearcut size range)	
Shelterwood	
Other:	
Uneven-aged management	1,182 acres
Individual tree selection	
Group selection	
Other:	
☐ Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Approximately 703,445 bf/ac/year
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest	

rates estimates are based:
The original NTMPs used plot data and stand projection tables to calculate AAC and harvest rates based on 15 year re-entry periods. More recent growth and yield calculations by Harlan Trammer based on CFI plot data have resulted in amended sustainability analysis in both NTMPs. The SPR NTMP has also been amended with post Lockheed Fire stand data.
Species in scope of joint FM/COC certificate: *Scientific/ Latin Name* (Common/ Trade Name)
Coastal redwood (*Sequoia sempervirens*) Douglas-fir (*Pseudotsuga menziesii*)

1.2.2 FSC Product Classification

Timber products		
Product Level 1	**Product Level 2**	**Species**
W1	W1.1	Coastal redwood (*Sequoia sempervirens*) Douglas-fir (*Pseudotsuga menziesii*)
Non-Timber Forest Products		
Product Level 1	**Product Level 2**	**Product Level 3 and Species**

1.2.3 Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	12 acres

High Conservation Value Forest/ Areas

High Conservation Values present and respective areas: **Units:** ☐ **ha or** ☒ **ac**

	Code	HCV Type	Description & Location	Area
☒	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Approximately 200 occurrences of rare, threatened and endangered species are recorded on the California Natural Diversity Database on or within 5 miles of Swanton Pacific Ranch properties	
☐	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
☒	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Approximately 200 occurrences of rare, threatened and endangered species are recorded on the California Natural Diversity Database on or within 5 miles of Swanton Pacific Ranch properties	

☒	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	These properties occur within and close to highly urbanized areas in Santa Cruz County, CA and provide a significant amount of refugia for the "beneficial uses" of the State.	
☐	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
☐	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total Area of forest classified as 'High Conservation Value Forest/ Area'				**1500**

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

☒ *N/A – All forestland owned or managed by the applicant is included in the scope.*		
☐ *Applicant owns and/or manages other FMUs not under evaluation.*		
☐ *Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.*		
Explanation for exclusion of FMUs and/or excision:		
Control measures to prevent mixing of certified and non-certified product (C8.3):		
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	**Location (city, state, country)**	**Size (☐ ha or ☐ ac)**

1.4 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):	
12 male workers	3 female workers

1.5 Pesticide and Other Chemical Use

☒ *FME does not use pesticides.*				
Commercial name of pesticide / herbicide	**Active ingredient**	**Quantity applied annually (kg or lbs)**	**Size of area treated annually (ha or ac)**	**Reason for use**

1.6 Standards Used

1.6.1 Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard	V1-0	July 2010
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSglobalServices.com).		

1.6.2 SCS Interim FSC Standards

Title	Version	Date of Finalization
NA		
This SCS Interim Standard was developed by modifying SCS' Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of the Draft Regional / National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, the SCS Draft Interim Standard for the country / region was sent out for comment to stakeholders identified by FSC International, SCS, the forest managers under evaluation, and the National Initiative. A copy of the standard is available at www.scsglobalservices.com/certification-standards-and-program-documents or upon request from SCS Global Services (www.SCSglobalServices.com).		

1.7 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	**To**	**multiply by**
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft)	Meter (m)	0.3048
Yard (yd)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	**To**	**multiply by**
Square foot (sq ft)	Square meter (m^2)	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	**To**	**multiply by**
Cubic foot (cu ft)	Cubic meter (m^3)	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

2. Description of Forest Management

2.1 Management Context

2.1.1 Regulatory Context

Pertinent Regulations at the National Level	Endangered Species Act Clean Water Act (Section 404 wetland protection) Occupational Safety and Health Act National Historic Preservation Act Archaeological and Historic Preservation Act Americans with Disabilities Act U.S. ratified treaties, including CITES Lacey Act Forest Resources Conservation and Shortage Relief Act National Resource Protection Act National Environmental Protection Act National Wild and Scenic River Act Native American Grave Protection and Repatriation Act Rehabilitation Act Architectural Barriers Act
Pertinent Regulations at the State / Local Level	Z'Berg-Nejedly State Forest Practices Act of 1973 California Endangered Species Act California Environmental Quality Act California Civil Code Section 1008 Native Plant Protection Act Porter-Cologne Water Quality Control Act The California Forest Practice Rules (FPR) Williamson Act Timberland Productivity Act

Regulatory Context

The most influential body of regulations governing private forest land management in California is the state forest practice regulations, developed by the State Board of Forestry and Fire Protection and administered by the California Department of Forestry and Fire Protection (Cal Fire). These regulations collectively require that all commercial timber harvesting must be covered by a permitting process in which the landowner (or representative) submits a *timber harvesting plan* (THP) prepared by a *registered professional forester* (RPF) to Cal Fire for review and approval. For properties 2500 acres and less, an NTMPs may be submitted instead. NTMPs are a forest planning method by which smaller landowners can opt to prepare a long term management plan as an alternative to filing individual THPs. In exchange, landowners agree to manage their forests through uneven-aged management and long-term sustained yield. Harvest yield is calculated for NTMPs based on a required sustained yield analysis, which incorporates data collected on growth and yield, species composition, site conditions,

management objectives, future conditions and proposed management activities and prescriptions. Calculations for sustained yield must consider the effects of repeated harvest cycles and multiple rotations on the timber products and ecosystem. The review process involves the active participation (on a case-by-case basis) of other state agencies, particularly the Department of Fish and Game (DFG), the Regional Water Quality Control Board, and the California Geological Survey (CGS). Swanton Pacific Ranch's compliance with the state Forest Practice Rules is evaluated on a continual basis by a Forest Practices Inspector from CDF. Inspections occur throughout the implementation of the NTMP process (before and after harvest). SPR is also subject to inspections from the Central Coast Regional Water Quality Control Board and subject to zoning and land use restrictions in the counties in which they own land.

Under the California Forest Practice Rules, SPR is subject to the specific restrictions and regulations that apply to the Southern Sub-district of the Coast Forest District. Given the high population density and sensitive rural-urban fringe, this area is often considered to be the most regulated forestry district in the state. Special rules apply to many specific aspects of SPR's forestry operations, particularly those affecting riparian zone and stream buffer management, openings size limits and harvest methods.

2.1.2 Environmental Context

Environmental safeguards:
NTMPs address the protection of soil and water resources through erosion management, harvest prescriptions, harvest close out measures, road construction and equipment use. Harvests are designed to preserve litter wherever possible and bared soil is mulched with organic debris in order to retain moisture and decrease erosion. Whenever possible, existing roads are reused. Slash is spread and crushed on areas bared by tractor skidding to prevent erosion, reduce fire hazard and recycle nutrients back into the soil. Wintertime operations are limited by the California Forest Practice Rules to minimize soil compaction. All watercourses are subject to California Forest Practice Rules which are specifically designed to protect water quality and riparian habitat. Trees along streams are felled to avoid residual canopy damage of both the overstory and understory. A strict water quality monitoring protocol required by the CCWQCB is adhered to for the full five years following harvests. An additional water quality monitoring study is also underway on Little Creek. Four monitoring flumes measure suspended sediment and water temperature before and after single-tree and group selection harvests.
Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:
Before approval of an NTMP the possible presence of RTE species must be determined. Local botanical and biological experts are consulted with regard to the particular management unit. If rare or listed species may be present, a botanical survey or specific species protocol survey must be conducted, unless the species is assumed present and mitigations for protection incorporated. For certain species, such as marbled murrelet, the RPF may contact the Department of Fish and Game to find out the closest known location of the species to the proposed project area. Species scoping and survey information is included in the THP or NTMP. Several endangered species are found on SPR, including the red-legged frog and an endemic manzanita species. Extremely diverse native plant species are also present, mainly in the grasslands, which are managed through careful livestock movement. Wildlife trees are often marked during harvest layout and all snags and partial snags are left standing unless they present a safety risk. SPR maintains several HCVF and reference stands where harvests are not conducted, some of which provide additional protected habitat for RTE species, both flora and fauna.

2.1.3 Socioeconomic Context

(portions of this section are adapted from the 2009 recertification report)

The Swanton Pacific Ranch has lands dedicated to conservation, native grasslands, forestry, ranching, and agriculture. There are also areas dedicated to housing, education, logging competitions, and storage of vehicles and farming equipment. Currently at SPR rangeland management, organic agriculture, forestry, water management and monitoring, research, and hunting are all regulated activities.

The forestry program has a management objective to establish a regulated uneven-age forest that will provide a sustainable, economical yield of coast redwood and Douglas-fir forest products, other forest uses, and amenities. Given the population growth in the area and the ever increasing land values and conversion of forestland to vineyards, very little active forest management is currently practiced in the Santa Cruz Mountains. There is only one active mill remaining, otherwise SPR must haul logs to the port of Oakland for export. Most of those living in the area are no longer employed in natural resource management, and instead work in nearby population centers. However, even though the logging industry has contracted substantially since the inception of the forestry program on the ranch, it is sustained through its association with Cal Poly University and by the demonstration, education and research mission.

2.1.4 Land use, Ownership, and Land Tenure

(portions of this section are adapted from the 2009 recertification report)

The land use history of the property is well described in the 2011 SPR Management Plan. In a span of just over a hundred years, the property has passed from local indigenous tribes to large Mexican land grants interspersed with smaller landowners, and then through the transition of California from Mexico to the United States. The 3,000 acres of SPR comprise much of the original Agua Puerca y Las Trancas Land Grant, which changed ownership several times from the 1860s onward and part of which was subdivided into smaller tracts and sold to smaller landholders. Al Smith, benefactor of the Swanton Pacific Ranch, took ownership of the area in the late 1940s. Agricultural land uses during this time included beef and dairy cattle, flowers, and Brussels sprouts, artichokes and other row crops. Clear-cutting of the forested areas occurred in the 1920s followed by high-grading in the 1950s. The construction of dams and the divvying up of water rights were essential to the development of many of these land uses.

The Valencia Creek property was added to the largest land grant in Santa Cruz County, the Rancho Soquel, in 1844. In the early 1900s, this tract was clear-cut. The resulting stand became second-growth Coastal redwood-Douglas-fir with some areas of tanoak and brush. At least two re-entries of selection harvest took place in the 1960s and 1970s under ownership prior to Al Smith (who purchased the tract

in 1980). The NTMP was approved in 2001 for the Valencia Creek Division. A major amendment to the NTMP in 2013 added 13 acres to the Valencia Creek tract due to a change in zoning to TPZ.

Al Smith purchased the parcels that eventually became Swanton Pacific Ranch over a 40-year period. Al Smith led a very active life and was the founder and original owner of Orchard Supply Hardware, which he and his family sold in the 1970s. Mr. Smith emphasized how important Cal Poly's "learning by doing" philosophy was instrumental in his personal and professional development. He donated most of his assets, including Swanton Pacific Ranch and its original endowment, to Cal Poly.

Although the management of SPR has remained constant for many years, the ownership and management of adjacent lands have recently been in flux, which affects access and boundary issues for SPR. Approximately 7000 acres to the south of SPR is going to be transferred to the BLM. Approximately 7500 acres to the north and west of SPR is under ownership of the Partners of CEMEX Redwoods. This area is planned for active forest management and public access through recreation trails. These developments will increase public access opportunities around the borders of the ranch and increase pressure to establish clear use and access guidelines.

2.2 Forest Management Plan

Management Objectives:
The vision of Al Smith was to maintain Swanton Pacific Ranch "intact and natural, a lab and a classroom for the College of Agriculture for 'Learn by Doing' forever." His wanted the property to remain as open space, the railroad to be maintained intact and available to the public and the remaining large redwoods, including the tree known as General Smith, left untouched. The general vision for SPR (as taken from the 2011 Management Plan) is: 1. To foster Al Smith's vision and Cal Poly's "learn by doing" philosophy by providing collaborative, interdisciplinary, and technology-mediated learning experiences on a working ranch with diversified agricultural and natural resources in California's coastal region. 2. To provide Cal Poly students, staff, faculty, and the general public with a unique interdisciplinary environment in which to live and learn. 3. To explore such interdisciplinary areas as: experimental agriculture; agri- Tourism; environmentally conscious architectural design and construction; sustainable uses of the land; and environmental, conservation and ecology studies. 4. To offer educational programs that emphasize pedagogies and formats appropriate to Cal Poly's commitment to active and applied learning. 5. To provide an opportunity for residential living/learning, co-curricular learning, and participation in applied research projects and community service activities. 6. To assist and guide the University in its realization of the goal to develop a comprehensive

environmental vision through teaching environmental literacy and protecting the environmental quality of the Ranch.

The specific goal of the forestry program is to develop and demonstrate uneven-aged forest management and sustainable yields.

Forest Composition and Rationale for Species Selection:

SPR forestlands consist primarily of stands of second growth coast redwood (*Sequoia sempervirens*). Douglas fir (*Pseudotsuga menziesii*) is the only other commercial species of any significance.

General Description of Land Management System(s):

SPR is managed in two main units, the Little Creek Unit and Scotts Creek, with additional satellite stands. The Valencia Creek Unit is a separate property. The overall management strategy for the Little Creek unit is a selective harvesting of approximately 20 - 40% of the timber in a minimum 10-year cycle. Management goals for the Scotts Creek unit include:

- Restore the health of the Monterey pine stand by exposing bare mineral soil

to promote seedling generation and culling pitch canker diseased trees;

- Thinning redwood trees to encourage regeneration and to open up the

forest canopy thus promoting forest floor diversity;

- Remove harvestable fir while leaving the existing oak/hardwood mix intact

and

- Interplant the riparian alder zone with redwoods.

The management practices to achieve these objectives are to promote light, fire and scarification conditions for the Monterey pine stands to increase regeneration of disease resistant stock. Other practices are to interplant redwoods where possible along the riparian zone, manage alder populations and maintain a wildlife management program to reduce the pig population.
The satellite stands are of poorer quality due to high grading in the 1950s. The area is steep with many watercourses. SPR intends to manage the units to improve stand conditions even though it will likely mean a financial loss.
The Valencia Creek tract is managed under an NTMP and provides more opportunity for ongoing forestry education and demonstration.

Harvest Methods and Equipment used:

Single tree selection is accomplished with tractor and cable yarding: crawler tractors, skyline cable yarder, chainsaw (hand felling), selective yield yarder system (SYYS).

Explanation of the management structures:

As taken from the 2011 SPR Management Plan, p. 129. “The Ranch Director is responsible for planning the educational curriculum, supervising special problems projects and senior projects and interns activities. Each of the project directors responsible for forestry, crops, livestock, railroad and education prepare an annual budget request and plan. This budget is reviewed and approved by the Natural Resource Specialist, Livestock Specialist and Program Assistant before being approved by the Dean of Agriculture, the Foundation and the President. The Ranch planning is coordinated by the Ranch Operations and Education Committee. The Ranch Director reports Ranch program activities to the Dean of the College of Agriculture who in turn advises the Cal Poly Foundation. The Cal Poly Foundation is responsible for administering the finances of the Ranch and ensuring that the terms of the Grant Deed are fulfilled.

2.3 Monitoring System

Growth and Yield of all forest products harvested:
Ranch staff and forestry students monitor CFI plots in every management unit to determine conifer growth rates. Growth is compared against the projected growth in the NTMPs to plan harvests and reach desired stocking.
Forest dynamics and changes in composition of flora and fauna:
Significant changes in composition are not anticipated. Rather, successive selective harvests are designed to favor redwood regeneration and remove Doug fir. At most composition is altered ten to twenty percent in any given stand in favor of redwood.
Environmental Impacts:
Water quality monitoring (and related road monitoring following rain events) is conducted as specified by the Central Coast Regional Water Quality Control Board, and organized around the 5 year monitoring protocol for erosion mitigation and water quality as required. Additional water quality monitoring is conducted as part of ongoing research projects to assess potential impacts from harvests. Habitat monitoring is conducted as required under the NTMP in conjunction with NTOs as conditions change or RTE species monitoring needs updating.
Social Impacts:
SPR hosts annual research fora for the community to participate in to learn about ongoing research projects and results on the ranch. Ranch interns are required to do 10 hours of community service and the ranch hosts many community events including ongoing Scotts Creek Watershed Council meetings. During the design phase of the educational facilities the ranch invited local community members' input and encourages community participation in the CSA. Impacts from harvest activities are tracked through notes from stakeholder meetings and emails received through the website.
Costs, Productivity, and Efficiency:
The Cal Poly Foundation is responsible for administering the finances of the Ranch and ensuring that the terms of the Grant Deed are fulfilled. Each of the project directors responsible for forestry, crops, livestock, railroad and education prepare an annual budget request and plan. This budget is reviewed and approved by the Natural Resource Specialist, Livestock Specialist and Program Assistant before being approved by the Dean of Agriculture, the Foundation and the President. Receipts from timber revenue are retained to fund operational costs on the ranch.

3. Certification Evaluation Process

3.1 Evaluation Schedule and Team

3.1.1 Evaluation Itinerary and Activities

Date 3/18/14	
FMU/Location/ sites visited	**Activities/ notes**
Al Smith's House: conference annex	Opening Meeting: Introduction of audit team, Swanton staff and Cal Poly observers. Update on FSC policies, IGI process. Discussion of findings from the last audit. Review of audit scope and daily itinerary.
Valencia tract site visits:	1. Unit 1, walk along Fern Flat disputed road – discussed mark and faller tally error. Saw gate and sign regarding seasonal access. Discussed WLPZ management and voluntary cut restrictions.

	2. Landing 8, unit 2 harvest, C1 subunit. CFI plot, discussed SYYS, Class 1 WLPZ and how to fund the field camp, decision to cut harder in Valencia this cycle. 3. Unit 2, L42: Discussed 2 large trees, fir not marked, RW marked. Discussed marking guidelines, retention age, avg stand diameter and desired diameter of crop trees. 4. T12, Unit 1: Walk up into research area, possible RSA reserved from harvest due to unique features including larger, older trees. Discussed research options with a 100% cruise for the site, including fuel loading, carbon storage, suppression. Discussed possibility of doing a Section V project – spatially explicit riparian management on upper North Fork of Little Creek.
Date 3/19/14	
FMU/Location/ sites visited*	**Activities/ notes**
Site visits TBD	1. Boy Scout Camp: Discussed new THP (Scout Gulch THP) which includes fuel management around the camp and limited harvest in the "Triangle." Saw crossing in need of culvert replacement – discussed THP as a method to replace the crossing. Discussion with Scout representative on potential management of the area, balancing scout's needs for access and safety with Swanton's THP. 2. Scout Gulch Trail: Discussed the effects from the fire, research opportunities post fire, potential harvests in the area, access and recreation, HCVF and burl forming manzanita.
Al Smith house conference room	Closing Meeting and Review of Findings:

3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	2
B. Number of auditors participating in on-site evaluation:	2
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
D. Total number of person days used in evaluation:	**7**

3.1.3 Evaluation Team

Auditor Name:	Robert J. Hrubes, Ph.D.	**Auditor role**:	Lead Auditor
Qualifications:	Dr. Hrubes is a California registered professional forester (#2228) and forest economist with over 35 years of professional experience in both private and public forest management issues. He is presently Executive Vice-President of SCS Global Services. In addition to serving as team leader for the Michigan state forestlands evaluation, Dr. Hrubes worked in collaboration with other SCS personnel to develop the programmatic protocol that guides all SCS Forest Conservation Program evaluations. Dr. Hrubes has previously led numerous audits under the SCS Forest Conservation Program of North American public forest, industrial forest ownerships and non-industrial forests, as well as operations in Scandinavia, Chile, Japan, Malaysia, Australia and New Zealand. Dr. Hrubes holds graduate degrees in forest economics (Ph.D.), economics (M.A.) and resource systems management (M.S.) from the University of California-Berkeley and the University of Michigan. His professional forestry degree		

	(B.S.F. with double major in Outdoor Recreation) was awarded from Iowa State University. He was employed for 14 years, in a variety of positions ranging from research forester to operations research analyst to planning team leader, by the USDA Forest Service. Upon leaving federal service, he entered private consulting from 1988 to 2000. He has been Senior V.P. at SCS since February, 2000.		
Auditor Name:	Liz Forwand	**Auditor role**:	Auditor
Qualifications:	Ms. Forwand is a Certification Forester in the SCS Forest Management program. She holds a B.A. in Human Biology from Stanford University and Masters of Environmental Management and Masters of Forestry degrees from Duke University's Nicholas School of Earth and Environmental Science. She has worked in rural land use planning in Colorado and Montana and in forest certification and sustainable agriculture in Indonesia. She is an ISO accredited lead auditor and a Registered Professional Forester (RPF #2974) in the state of California. She has conducted forest management and chain of Custody evaluation and surveillance audits throughout the United States and Indonesia.		

3.2 Evaluation of Management System

3.2.1 Methodology and Strategies Employed

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

3.2.2 Pre-evaluation

☒ A pre-evaluation of the FME *was not* required by FSC norms.

☐ A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

3.3 Stakeholder Consultation Process

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

- To solicit input from affected parties as to the strengths and weaknesses of the FME's management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

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

Principal stakeholder groups are identified based upon results from the pre-evaluation (if one was conducted), lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders in this evaluation:

3.3.1 Stakeholder Groups Consulted During Evaluation for Certification

FME Management and staff	Pertinent Tribal members and/or representatives
Consulting foresters	Members of the FSC National Initiative
Contractors	Members of the regional FSC working group
Lease holders	FSC International
Adjacent property owners	Local and regionally-based environmental organizations and conservationists
Local and regionally-based social interest and civic organizations	Forest industry groups and organizations
Purchasers of logs harvested on FME forestlands	Local, state, and federal regulatory agency personnel
Recreational user groups	Other relevant groups

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments. The table below summarizes the major comments received from stakeholders and the assessment team's response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

3.3.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

Stakeholder Comments	SCS Response
Economic Concerns	
There is a push right now to get revenue to expand the facilities, which is driving harvest timing.	Auditors thoroughly reviewed the current harvest plans on the Valencia Unit, from which the revenue will be used to fund the new field camp facilities. While the harvest will remove more volume than any previous harvests, a viable argument exists that it will also open up the forest canopy to create more group selection openings and encourage redwood regeneration. It should create a more structurally diverse stand and increase the representation of early successional habitat as well. These additional outcomes are also

	desired goals and are in keeping with the requirements regarding harvest levels under Principle 5, and stand characteristics under Principle 6.
Social Concerns	
SPR seems really engaged with neighbors and the community, especially given that Santa Cruz is kind of tough on forestry. Whenever there is research being presented they open up the forum to the community, people always seem to go.	Noted as evidence of conformance.
Environmental Concerns	
SPR seems to often have large projects dealing with erosion control and road maintenance.	The auditors reviewed requirements related to erosion control, stream crossings and road maintenance and found no evidence of non-conformance. No violations were reported by CAL FIRE.

4. Results of The Evaluation

Table 4.1 below, contains the evaluation team's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C.

Principle / Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard
P1: FSC Commitment and Legal Compliance	Adherence to the CA FPRs ensures SPR meets legal obligations.	OBS 2014.1, 1.5.b
P2: Tenure & Use Rights & Responsibilities		OBS 2014.2, 2.1.b SPR permits many undocumented uses of the property by other parties – eventually documentation of permitted rights will ensure all party's rights are respected.
P3: Indigenous Peoples' Rights	None noted	None noted
P4: Community Relations & Workers' Rights	Despite challenging circumstances SPR is actively engaged with their community and addresses stakeholder issues as they arise.	CAR 2014.3, 4.2.b CAR 2014.4, 4.5.b
P5: Benefits from the Forest	With a broad mission including education and demonstration, SPR manages its forest resource for diverse benefits.	None noted
P6: Environmental Impact	Extremely limiting regulations also ensure that environmental impacts	OBS 2014.5, 6.3.h CAR 2014.6, 6.4.a

	of harvesting are minimized.	
P7: Management Plan	SPR's management plan is extremely thorough for an operation of its size. The website does an excellent job portraying the variety of projects conducted on the property.	CAR 2014.7, 7.1.a
P8: Monitoring & Assessment	None noted	OBS 2014.8, 8.3.b
P9: High Conservation Value Forests	HCVs have been documented in several reports which are easily available on the website.	OBS 2014.9, 9.1.c
Chain of custody	None noted	OBS 2014.8, 8.3.b

4.2 Process of Determining Conformance

4.2.1 Structure of Standard and Degrees of Non-Conformance

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

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

4.2.1 Interpretations of Major CARs, Minor CARs and Observations

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

Minor CARs: These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are

the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

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

4.2.2 Major Non-Conformances

☒	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
☐	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
☐	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.

4.2.3 Existing Corrective Action Requests and Observations

	Finding Number: 2013.1
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC US National Standard, Indicators 4.1.f and 4.1.g
Issue: Managers of FSC certified forests must provide evidence that the FME provides and/or supports learning opportunities to improve public understanding of forests and forest management. Managers of FSC certified forests are also expected to provide evidence that the FME participates in local economic development and/or civic activities.	
Observation: SPR has an exemplary track record in supporting educational opportunities on SPR and participating in activities in the local economic and development and civic arena. But it has not done a good job of telling this story, such as on its website.	

FME response *(including any evidence submitted)*	On Feb. 18, 2014, SCS received the following from Steve Auten, partially identifying items that have not yet but that will be added to the SPR website under a new section about community involvement: "Update our activities on the SPR web-site: a. List of learning opportunities that SPR has provided i. Northern and southern SAF meeting ii. Forestry Challenge iii. Cal Conclave iv. Others??? b. Civic opportunities that SPR has provided i. Pacific School Fundraiser ii. Should we provide a general document that discusses inputs to the community from SPR operations? iii. Others??"
SCS review	On the assurance that the SPR website will soon be augmented with a brief section on community involvement activities such as those listed in the 2/18/2014 email from Steve Auten, SCS concludes that closure of this Observation is warranted.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2013.2
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC US National Standard, Indicator 6.3.f
Issue: Trees within a certified forest that that meet the FSC definition of "Legacy Tree" must be identified and protected from harvest. SPR has developed a solid Legacy Tree policy and program but the protocol has not yet been fully applied in the Valencia Tract. There also remains ambiguity about the meaning of the term "Reconnaissance."	
Observation: Qualifying Legacy Trees on the Valencia Creek Property had not been added to SPR's Legacy Tree inventory via the program protocol at the time of the 2013 surveillance audit. How SPR personnel locate Legacy Trees on Swanton Pacific Ranch needs to be developed more. Specifically, the word "Reconnaissance" needs to be better defined.	

FME response *(including any evidence submitted)*	On Feb. 18, 2014, SCS was provided with this response from Steve Auten: "I have attached the latest iteration of our Legacy Tree Report. It more specifically defines "reconnaissance" by linking five days of field time to the forested area shown on the map in Figure 3. As for Valencia we have identified our legacy trees in the same manner. Reconnaissance covered all of the forested areas and existing legacy trees were mapped. We will take the LTO to each of these trees in Unit II prior to any operations to insure their protection. I have attached the latest GIS operations map for Unit II that shows the locations of the two legacy trees. The LTO map from Unit 1 is also provided to demonstrate that legacy trees (3) were identified and protected during last year's operations. We'll utilize our forestry interns to complete the next update to the Legacy Tree Report this summer to completely integrate Valencia into this document."
SCS review	SCS considers the 2/18/2014 response to be adequate to warrant closure of this Observation, on the expectation that the Legacy Trees activities planned for Valencia later this year will be carried out.
Status of CAR:	☒ Closed ☐ Upgraded to Non-Conformity ☐ *Other decision (refer to description above)*

	Finding Number: 2013.3
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC US National Standard, Indicator 8.5.a
Issue: Managers of FSC certified forests most make readily available to the public the full results of monitoring activities on the certified forest or an up-to-date summary, covering the Indicators listed in Criterion 8.2.	
Observation: SPR managers and Cal Poly faculty engage in a very diverse array of monitoring activities on the certified forest, but the results of these monitoring activities are not made readily accessible to interested stakeholders, either in total or in the form of a periodically updated summary, such as in a dedicated section on the SPR website devoted to "results of monitoring activities."	

FME response *(including any evidence submitted)*	On Feb. 18, 2014, SCS was provided with this response from Steve Auten that was part of a memo directed to pertinent SPR and Cal Poly personnel about how to respond to this Observation: "Update our monitoring activities on SPR web-site What should this entail? Add all NTMP amendments? Add recently completed graduate thesis to web-site? Add selected senior projects? Add CCRWQCB web-site so our yearly IWWDR can be found more easily by the public? Make the link to our FSC audit reports more available on the SP web-site? Add a public summary for each year's activities instead? Other ideas????"
SCS review	On the assurance that the SPR website will soon be augmented with a new section on the results of monitoring activities, such as those listed in the 2/18/2014 email from Steve Auten, SCS concludes that closure of this Observation is warranted.
Status of OBS:	☒ Closed ☐ Upgraded to Non-Conformity ☐ *Other decision (refer to description above)*

4.2.4 New Corrective Action Requests and Observations

	Finding Number: 2014.1
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	1.5.b
Issue: Signage on the upper (unlocked) gate to Fern Flat Road is old and has been modified with hand-written updates to SPR contact persons and telephone numbers. Most pertinently to this Indicator, the signs prominently state: "Road Closed Through Winter." A reasonable interpretation of this message is that the road is not closed in the summer season which fundamentally conflicts with the policy that has been conveyed by Swanton Pacific personnel to residents located uphill of this gate that the Fern Flat Road segment that runs through the SPR Valencia Tract is closed year-round except for emergency circumstances.	
Observation: The old and outdated signage on the upper gate of Fern Flat Road is not an effectively implemented action to curtail unauthorized use of Fern Flat Road.	

FME response *(including any evidence submitted)*	
SCS review	
Status of OBS:	☐ Closed ☐ Upgraded to Non-Conformity ☐ *Other decision (refer to description above)*

	Finding Number: 2014.2
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	2.1.b
Issue: With respect to both the Fern Flat Road segment crossing the Valencia Tract and the Boy Scout Camp on the Swanton Pacific Ranch, the uses that SPR Managers consider to be duly authorized with respect to the road and the area containing and surrounding the Camp have not been properly documented and, as such, individuals and organizations engaged in use of these areas may not be in agreement with SPR Managers.	
Observation: Clarification and documentation of the authorized and permitted uses of the Fern Flat Road and the area occupied by the Boy Scout Camp would help to resolve current or future tensions and possible disputes with people who are using these portions of the certified forest.	
FME response *(including any evidence submitted)*	
SCS review	
Status of OBS:	☐ Closed ☐ Upgraded to Non-Conformity ☐ *Other decision (refer to description above)*

	Finding Number: 2014.3
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	4.2.b
Non-Conformity: The contract between Swanton Pacific Corporation and Big Creek Lumber Company that covers timber harvesting, hauling and appurtenant activities does not expressly contain safety provisions/requirements, as stipulated in FSC U.S. National Standard, Indicator 4.2.b.	
Corrective Action Request: Modify all contracts covering activities undertaken by contractors on the forestlands within the scope of FSC Certificate: SCS-FM/COC-00071N , including but not limited to the contract with Big Creek Lumber Company, to expressly incorporate safety provisions/requirements.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.4
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	4.5.b
Non-Conformity: The "Contact Us" link on the SPR website's homepage directs the user to a generic page on the Cal Poly campus in San Luis Obispo. This does not provide "a known and accessible means for interested stakeholders to voice grievances and have them resolved" or to generally provide input or ask questions, as is required by FSC U.S. National Standard, Indicator 4.5.b.	
Corrective Action Request: On the SPR website or through other effective mechanisms, establish a known and accessible means for interested stakeholders to voice grievances and have then resolved or to generally provide input or ask questions.	
FME response *(including any evidence submitted)*	

SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.5
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	6.3.h
Issue: Invasive exotic plant species, notably French broom, are present on the certified forest.	
Observation: There is an opportunity for SPR managers to demonstrate stronger conformity to FSC U.S. National Standard, Indicator 6.3.h by undertaking an assessment of the risks to native species and communities associated with invasive exotic plants found on both the Swanton and Valencia tracts of the certified forest. As warranted, SPR managers should develop, document and implement a strategy to prevent and/or control invasive species such as French broom.	
FME response *(including any evidence submitted)*	
SCS review	
Status of OBS:	☐ Closed ☐ Upgraded to Non-Conformity ☐ *Other decision (refer to description above)*

	Finding Number: 2014.6
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FF 6.4.a

Non-Conformity: There is presently lack of consistency and clarity in the use of several terms, all of which pertain to areas possessing attributes of note and that warrant special consideration in the course of designing and executing management activities on the certified forest. Terms with overlapping but not clearly and operationally defined meaning and use include: Reserve Areas, Reference Areas, Research/Study Areas, and Large Tree Management Areas. Due to this ambiguity, effective consultation with stakeholders and external experts as well as identification of qualifying areas in the certified forest is hampered.	
Corrective Action Request: SPR must review the current array of terms used for areas possessing special attributes on the certified forest and then modify as appropriate so as to establish a more coherent, consistent and effective system and classification nomenclature, in line with FSC requirements.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.7
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FF 7.1.a
Non-Conformity: The description/treatment of areas on the certified forest possessing High Conservation Value Forest attributes is not adequately/consistently presented in the SPR Management Plan. Further the SPR Management Plan Summary has not been updated to incorporated HCVF-related planning, identification and classification work that has been completed on the certified forest.	
Corrective Action Request: In the SPR Management Plan Summary, and other appurtenant plan documents as appropriate, the presentation of SPR's approach to and management designations made with regard to areas possessing High Conservation Value Forest attributes must be updated.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.8
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	8.3.b (see also SCS COC Indicators for FM)
Issue: There remains some uncertainty on the part of the SPR Operations Director as to proper information (FSC certificate number and claim) to be placed on load tickets accompanying logs from the certified forest going to customers that wish to receive the material as FSC certified. At present, the FSC certificate number and claim is being handwritten on the tickets.	
Observation: Certainly prior to having a new supply of load tickets produced, a mock-up of the ticket containing the FSC certificate number and claim should be sent to SCS for review. Likewise, the use of the FSC logo and the SCS logo on the SPR website should also be reviewed by appropriate personnel at SCS. SPR is encouraged to use both the FSC and SCS logos in off-product applications such as websites and printed materials.	
FME response *(including any evidence submitted)*	
SCS review	
Status of OBS:	☐ Closed ☐ Upgraded to Non-Conformity ☐ *Other decision (refer to description above)*

	Finding Number: 2014.9
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	9.1.c
Issue: There are inconsistencies in the content of three different SPR management plan documents that address HCVF.	

Observation: The clarity of SPR's approach to and status of High Conservation Value Forest areas would be improved by a review and harmonization of the three management plan documents that address HCVF.	
FME response *(including any evidence submitted)*	
SCS review	
Status of OBS:	☐ Closed ☐ Upgraded to Non-Conformity ☐ *Other decision (refer to description above)*

5. Certification Decision

Certification Recommendation	
FME be awarded FSC certification as a "Well-Managed Forest" subject to the minor corrective action requests stated in Section 4.2.	**Yes** ☒ **No** ☐
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols. If certification is recommended, the FME has satisfactorily demonstrated the following without exception:	
FME has addressed any Major CAR(s) assigned during the evaluation.	**Yes** ☒ **No** ☐
FME has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this report) are met over the forest area covered by the scope of the evaluation.	**Yes** ☒ **No** ☐
FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.	**Yes** ☒ **No** ☐
Comments:	

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – Current and Projected Annual Harvest for Main Commercial Species

Annual harvest rates for all of SPR's managed forest have been maintained at approximately 500,000 board feet for the last 25 years. It is projected that the harvest rate of 500,000 board feet will stay approximately the same. Harvest volumes shall not exceed the growth of the stand subsequent to the previous harvest.

Appendix 2 – List of FMUs Selected for Evaluation

☒ FME consists of a single FMU

☐ FME consists of multiple FMUs or is a Group

Appendix 3 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Steve Auten	Ranch Operations Manager		Field consultation
Dr. Brian Diettterick	Professor, Cal Poly		Field consultation
Dr. Rich Thompson	Professor, Cal Poly		Field consultation
Dr. Douglas Piirto	Professor, Cal Poly		Field consultation

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Janet Webb	Big Creek		Phone	
Nadia Hamey	Private consulting forester		Field consultation	
Dr. Priya Verma	Professor, Cal Poly		Audit observer	
Jeff Reimer	Cal Poly		Phone	

Appendix 4 – Additional Evaluation Techniques Employed

No additional audit techniques were employed.

Appendix 5 – Certification Standard Conformance Table

C= Conformance with Criterion or Indicator
C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances

NC= Nonconformance with Criterion or Indicator
NA= Not Applicable

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles **Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.**		
1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
1.1.a *Forest* management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and ***administrative requirements*** (e.g., regulations). Violations, outstanding complaints or investigations are provided to the ***Certifying Body*** (CB) during the annual audit.	C	All forest management plans reviewed and operations visited during the evaluation demonstrated compliance with federal and local laws and regulations. SPR operates under approved NTMPs, which are designed to meet all applicable legal and administrative requirements. No violations under the California Forest Practice Rules (FPR) were issued to SPR over the past year.
1.1.b To facilitate legal compliance, the ***forest owner*** or ***manager*** ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	C	LTOs are used for timber operations, ensuring that contractors have received the requisite training in applicable forestry regulations. The Ranch Operations Manager is an RPF and SPR contracts an additional RPF to serve as the chief point of contact for relevant regulatory agencies. Cal Poly professors and staff provide additional supervision and guidance when needed.
1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	
1.2.a The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made. FF Indicator: Low risk of negative social or environmental impact.	C	The only fees due to forestry operations that are explicitly the responsibility of SPR as a separate entity from Cal Poly are yield taxes, which are paid in a timely manner. No evidence of nonpayment has been noted curing the audit cycle.
1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.	C	SPR operates under approved NTMPs, which are designed to meet all applicable legal and administrative requirements, including relevant international agreements,

FF Indicator: Low risk of negative social or environmental impact		of which there are relatively few. Labor regulations and ILO Conventions are adhered to as per state and federal labor requirements and CITES is not relevant given the species they are harvesting.
1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	C	No such conflicts have been found between compliance with the US Forest Management Standard and the California FPR.
1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the ***Forest Management Unit*** (FMU).	C	SPR has recurring problems with trespass and various forms of unauthorized use of the property. This may become a larger issue once the adjacent Cemex property fully changes hands and becomes open to public use through the planned trail system. The installation of a new gate on the Valencia tract main road has alleviated unauthorized access. The key system and video camera help determine who is accessing the property.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	For full description of findings, please see Observation 2014.1
1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	C	
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	C	Now in the beginning of their third certification cycle, SPR amply demonstrates their long-term commitment to adhere to the FSC P&C through their continued participation in certification evaluations, adherence to the requirements of the relevant FSC standards even as they have changed throughout the timeframe over which they have remained certified, and exemplary forest management practices informed by compelling research

		and in compliance with the especially stringent regulations for their region.
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	NA	All of SPR's forestland is under the scope of their certificate.
FF Indicator 1.6.c The forest owner, manager or group manager notifies the Certifying Body of significant changes in ownership, the certified land base and/or significant changes in management planning prior to the next scheduled annual audit, or within one year of such change, whichever comes first.	C	Although all the forested land managed by SPR is covered under the scope of the certificate, SPR did notify SCS of two instances over the past year where changes in management planning occurred. One concerned a Major Amendment to the NTMP covering the Valencia tract to include 12 additional acres due to a zoning change, although the 12 acres in question are not planned for harvest. The other change noted was a new THP on the land covering the Boy Scout camp and adjacent "Diamond" area in order to obtain permissions to replace a culvert.
Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	C	
2.1.a The forest owner or manager provides clear evidence of ***long-term*** rights to use and manage the FMU for the purposes described in the management plan.	C	Each NTMP contains a legal description of the property covered as evidence of long-term use rights to manage the property as planned.
2.1.b The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.	C	For full description of findings see OBS 2014.2.
2.1.c Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.	C	NTMPs and THPs include maps of all the areas proposed for management. A copy of the 1994 title report for SPR is kept on the manager's computer and helps keep the boundaries clear. Ownership boundaries have been surveyed and are clear to all parties on the ground.
2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the	C	

extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies. *Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.*		
2.2.a The forest owner or manager allows the exercise of ***tenure*** and ***use rights*** allowable by law or regulation.	C	There are very few use rights held by third parties by law or regulation. There are some roads where SPR has agreements with individuals or associations for access and maintenance, though these agreements are not necessarily written up and may be considered a prescriptive use right, though they have not been assessed by a lawyer. The boy scouts camp is also an example of a possible prescriptive use right that SPR has allowed for a number of years.
2.2.b In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.	C	In all cases, whether or not the use right is contested or has been legally verified, SPR makes efforts to consult with all interested parties. For example, prior to submitting a THP for the area that includes the scout camp, SPR will consult with those involved in the troupe to identify their needs and concerns and make sure the harvest does not negatively impact their use of the area.
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.	C	
2.3.a If ***disputes*** arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes. FF Indicator: Low risk of negative social or environmental impact.	C	SPR has attempted to resolve the dispute that has arisen with the Fern Flat Road Association regarding use of the road across the Valencia Tract through open communication, including multiple meetings and efforts towards a written access agreement.

2.3.b The forest owner or manager documents any significant disputes over tenure and use rights. FF Indicator: Low risk of negative social or environmental impact.	C	The above mentioned dispute has been documented through meeting minutes and records, reports following phone calls or meetings with individuals.
Princple #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
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.	NA	There are no Tribal forests under the scope of this certificate.
3.1.a Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.	NA	
3.1.b The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.	NA	
3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	C	
3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	Discussion with foresters during the audit confirmed that there are no American Indian groups or tribal members that hold legal rights or other kinds of binding agreements to any resources on SPR. All required consultation with Native American groups is conducted as per the public comment and notification requirements for THPs and NTMPs.
3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	The only tribal resources that have required special protective measures have been archeological sites found during standard archeological surveys conducted prior to active operations. These sites are relatively limited in the redwood forest. Standard protective measures include equipment exclusion buffers surrounding sites and instructions to fallers to fall trees away from site interiors.
3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
FF Indicator 3.3.a The forest owner or manager	C	All required consultation with Native American groups is

maintains a list of sites of current or traditional cultural, archeological, ecological, economic or religious significance that have been identified by state conservation agencies and tribal governments on the FMU or that could be impacted by management activities.		conducted as per the public comment and notification requirements for THPs and NTMPs. CalFire maintains the Native American Heritage contact list SPR uses for each notification. As per FPRs standard archeological surveys have been conducted and any sites found are listed and protected as necessary.
3.3.b In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).		No sites requiring special protection measures have been found. Two years ago Valentine Lopez of the Amah Mutsun Tribe gave a guest lecture at SPR. Each year Chuck Striplen, also of the Amah Mutsun Tribe, guest lectures in the Sustainable Forestry and Environmental Practices class, although this past year the class was not held.
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.	C	
3.4.a The forest owner or manager identifies whether ***traditional knowledge*** in forest management is being used.	C	No traditional knowledge regarding forest management is being used by SPR.
3.4.b When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.	NA	
3.4.c The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.	NA	
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	C	
4.1.a Employee compensation and hiring practices meet or exceed the prevailing ***local*** norms within the forestry industry. FF Indicator: Low risk of negative social or environmental impact.	C	The requirements of this indicator are ensured through the Cal Poly hiring process and requirements.
4.1.b Forest work is offered in ways that create	C	The unique position of SPR as a working forest and a

high quality job opportunities for employees. FF Indicator: Low risk of negative social or environmental impact.		research/demonstration forest as a teaching tool for Cal Poly students means the forestry work is done in a unique environment, creating an interesting job opportunity for employees.
4.1.c Forest workers are provided with fair wages. **FF Indicator:** Low risk of negative social or environmental impact.	C	Wages are offered by Cal Poly. No evidence was noted of unfair wages to workers.
4.1.d Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations. FF Indicator: Low risk of negative social or environmental impact.	C	The requirements of this indicator are mandatory in California and SPR compliance is ensured through the Cal Poly hiring process and requirements.
FF Indicator 4.1.e: The forest owner or manager, as feasible, contributes to the local community.	C	SPR hires and contracts with local applicants to the best of their ability. There are well fewer than 10 active logging contractors in Santa Cruz that bid on jobs, so the pool is relatively small. Goods and services are bought locally if available and most contractors are local due to SPR's location and travel time. SPR also contributes financially through yield taxes. The fire station on their property contributes to local safety.
4.1.f Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management. FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)	C	SPR has an exemplary track record in supporting educational opportunities on SPR, primarily through publicizing the research being done on the property through Cal Poly. An annual research forum is held to showcase research projects from the previous year and the community is invited to attend. Stakeholders contacted prior to the audit noted the research forum as a positive interaction with SPR.
4.1.g The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available. FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)	C	An observation last year noted that while SPR does an excellent job providing education on forestry topics to the community and actively participates in various civic activities, they have done a poor job describing this involvement on their website so that interested parties can see the full range of their engagement with the local community. Following this observation SPR decided to update their website with lists of learning opportunities they have provided, including: i. Northern and southern SAF meeting ii. Forestry Challenge iii. Cal Conclave;

		and civic opportunities provided, such as the Pacific School Fundraiser.
4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	C/NC	
4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1). FF Indicator: Low risk of negative social or environmental impact.	C	Compliance with health and safety laws is guaranteed by adherence to OSHA requirements, contract requirements and benefits packages offered by Cal Poly.
4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	NC	Please see CAR 2014.3 for full findings.
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan. FF Indicator: Low risk of negative social or environmental impact.	C	No evidence of poorly qualified workers was noted or discussed during the audit.
4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).	C	
4.3.a Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests. FF Indicator: Low risk of negative social or environmental impact.	C	The California legislature clearly protects workers right to organize and voluntarily negotiate with their employers. Workers at SPR are not unionized.
4.3.b The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management. FF Indicator: Low risk of negative social or environmental impact.	C	Significant disputes between workers and management have not arisen in the past year. Should disputes arise SPR would follow the dispute resolution process of Cal Poly.
4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.	C	
FF Indicator 4.4.a The forest owner of manager understands the likely social impacts of	C	SPR is highly sensitive to the social impacts of their harvest operations, particularly given the involvement and concerns

management activities, and incorporates this understanding into management planning and operations.		of the local community and access issues with neighbors. There are many parties who access/use/derive benefits from SPR forestland and the concerns of all such parties are considered prior to active operations and in planning decisions. For example, three meetings have been held in the last three months in regards to the disputed road access with the Fern Flat Road Assoc. Discussion is planned with the Boy Scouts troupe leaders prior to operations for the THP that incorporates the camp area.
4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities. FF Indicator: Low risk of negative social or environmental impact.	C	As noted above, SPR consults with those will be affected by timber operations in order to ensure their needs are met and they are not unduly negatively affected. For example, consultation with Boy Scout troupe leaders will take place prior to harvesting under the THP to assess how the scouts' use of the area can be made compatible with some stand improvement work and harvest plans under the THP for the area.
4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.	C	Although NTOs associated with NTMPs do not require public notification or notification of neighbors, SPR continues to notify any adjacent property owners or residents prior to active operations. This improves relations and ensures those affected by timber operations are not surprised by any inconveniences associated with the harvests. For example, SPR took out a road bond for possible damage to Ryder road, partly in response to concerns of residents. SPR has also improved the road (which serves as the main haul road) above and beyond the bond measures, which really just ensures repair in the case of negligent behavior by the LTO.
4.4.d For ***public forests,*** consultation shall include the following components: 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to	NA	SPR is privately owned.

planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.		
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.	C	
4.5.a The forest owner or manager does not engage in negligent activities that cause damage to other people.	C	No negligent behavior by SPR has been noted over the past year. SPR will put up bond measures to ensure against negligent damage on the part of LTOs (e.g. road bond for Ryder Rd).
4.5.b The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.	NC	Please see Minor CAR 2014.4 for description of findings.
4.5.c Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager. FF Indicator: Low risk of negative social or environmental impact	C	In the event of damage caused due to logging operations to a shared resource (e.g. residential access roads also used for hauling), SPR has committed to road repairs through bond measures.
Principle #5: Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments	C	

necessary to maintain the ecological productivity of the forest.		
5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.	C	SPR operations are funded through timber revenue receipts. The Ranch operations manager position is funded through the Cal Poly endowment, which is able to be called upon for financial support in down markets or for special projects, ensuring the financial viability of the ranch and the implementation of all activities necessary for compliance with this standard. Although public perception is that revenue generated on the ranch is send to Cal Poly, this is not the case. All revenue generated on the ranch stays on the ranch to fund operations.
5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	C	Last year's net harvest revenue was all set aside to fund the summer field camp. The current harvest on the Valencia tract removes more volume than any previous harvests, in an effort to provide sufficient funding for the summer field camp, which has generated intense and valuable discussion of harvest rates and regeneration and desired future goals amongst the many foresters providing input to harvest planning. In addition to meeting the need for a short term increase in revenue, the current harvest rate is expected to benefit regeneration by opening up stands, and so makes silvicultural sense in a manner meeting the intent of this standard.
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	C	
5.2.a Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service. FF Indicator: Low risk of negative social or environmental impact	C	Given the paucity of harvest crews working in the area (there are really only three functioning crews from which to choose at the moment) and the location of SPR, all harvesters are local. Big Creek most often buys the sales from SPR and is the only local mill in operation.
5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.	C	SPR sells timber in any form that will be bought by local mills. With the acquisition of a portable small mill, SPR has completed some small projects (picnic tables, benches) for use on the ranch. Should manufacturing such items commercially become an option, SPR will seek a separate CoC certificate.

5.2.c On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.	NA	
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	C	
5.3.a Management practices are employed to minimize the loss and/or waste of harvested forest products.	C	As described in the management plan, hardwood management is primarily through firewood collection. Undesirable brush or hardwood coppices need to be removed where competing with seedlings. Tanoak and madrone currently have no commercial use other than for firewood. Firewood cutting is done by the Ranch staff and students with direct sales to the public upon request and as supplies permit. Where possible, firewood removal may be part of timber harvest operations, which reduces material waste on site.
5.3.b Harvest practices are managed to protect residual trees and other forest resources, including: • soil compaction, ***rutting*** and erosion are minimized; • residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; • damage to NTFPs is minimized during management activities; and • techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.	C	The regulations governing harvest practices in the sub-district in which SPR operates are extremely restrictive, having been designed to optimally protect the residual stand. As such, the single tree selection practiced by SPR results in minimal damage to residual trees and other resources, including soil and NTFPs. Restrictions on winter operations (or operating during wet conditions) limits soil compaction, rutting and erosion. Single tree selection is implemented to leave a healthier, higher quality growing stand of residual trees. Topography has necessitated using a skyline yarder in the past and this year SPR will use an SYYS on the Valencia tract harvest, which further protects soil resources and minimizes residual damage on steep terrain.
5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	C	
5.4.a The forest owner or manager demonstrates knowledge of their operation's effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.	C	In discussions during the audit foresters and participants proved knowledgeable about their operation's effect on their local economy. SPR does not provide a lot of permanent employment opportunities, but provides innumerable opportunities for involvement and internships for students. Economic impact can also be thought of in

		terms of the frequency of harvests, the crews hired to conduct the logging and yield tax contribution to the local school system. SPR notes that by keeping their land in timber production and using all the related goods and services in the local community they contribute substantially to the local economy. SPR is extremely knowledgeable regarding the local timber market and keeps a close eye on the supply of different timber species, products, and prices.
5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.	C	Products sold off SPR are limited by what the local mills will buy. Given that the ranch is a Cal Poly property and as such used for a wide range of education purposes, paid for in part by student fees and research grants and funding, the economic use of the forest is already quite diverse, apart from the timber management operations.
5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	C	
5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.	C	Maintaining, and enhancing where feasible, public values associated with their forestland is an important aspect of SPR's forest management. For example, water resources are frequently reviewed for restoration activities, such as Scotts Creek marsh and Queseria Creek. Habitat restoration to promote and protect RTE species, as required by law, is also frequently undertaken and is considered to serve the public value of maintaining forest level biodiversity. Carbon storage is now a required component of THPs. In addition, SPR's role as a research forest provides considerable public benefits in the form of widely applicable research data obtained from studies on the ranch.
5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.	C	Measures to maintain the above mentioned public benefits are noted where required in NTMPs and THPs and in the management plan of the ranch as a whole for items that relate to its function as a resource of Cal Poly.
5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	C	
FF Indicator 5.6.a. On family forests, a sustained yield harvest level analysis shall be completed. Data used in the analysis may include but is not limited		SPR manages its forestland and plans their harvests according to two NTMPs and one THP in development. Both THPs and NTMPs require inventory data to be collected and harvest levels calculated from the data for each planning

to: - regional growth data; - age-class and species distributions; - stocking rates required to meet management objectives; - ecological and legal constraints; - empirical growth and regeneration data; and, - validated forest productivity models.		unit, whether that is an individual THP or subsequent NTOs under an NTMP. THPs must demonstrate maximum sustained production (MSP) of high-quality timber products while considering other forest values such as environmental protection, wildlife habitat, and future desired stand conditions. Yield must be planned such that over time the forest achieves a balance between growth and removal. Sustained yield harvest levels are approved if calculations show that harvests do not exceed growth over a long term planning time frame. SPR is currently preparing a THP for an area encompassing the Boy Scouts camp to address a crossing in need of upgrade. NTMPs are a method by which smaller landowners can opt to prepare a long term management plan as an alternative to filing individual THPs. In exchange, landowners agree to manage their forests through uneven-aged management and long-term sustained yield. Harvest yield is calculated for NTMPs based on a required sustained yield analysis, which incorporates data collected on growth and yield, species composition, site conditions, management objectives, future conditions and proposed management activities and prescriptions. Calculations for sustained yield must consider the effects of repeated harvest cycles and multiple rotations on the timber products and ecosystem. SPR maintains a GIS layer showing CFI plots initially developed for use in a Growth and Yield forestry class and now periodically measured to validate growth and yield modeling in FORESEE.
FF Indicator 5.6.b. On family forests, harvest levels and rates do not exceed growth rates over successive harvests, contribute directly to achieving desired future conditions as defined in the forest management plans, and do not diminish the long term ecological integrity and productivity of the site.	C	As described above, NTMPs require that harvests do not exceed levels approved through the sustained yield analysis to balance growth and removal. The Valencia Creek NTMP was recently updated with a revised sustainability analysis. CFI plots were re-measured in 2012 and compared against the modeled growth reported from 2002 post-harvest inventory data. Per the requirements of the NTMP sustainability analysis, harvest may not exceed the growth of the forest since the previous entry. Growth is reported at approximately 6.98 MMBF; therefore the 2013 harvest in Unit 1 and 2014 harvest in

		Unit 2 shall not exceed 6.98 MMBF volume harvested. Although the harvest planned in the NTO is well within removal levels stipulated by the NTMP, SPR frequently does and may again reduce their cut to a level of 4-5 MMBF for this harvest entry to achieve other goals and ensure desired future conditions are reached.
5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	C	Much discussion during the audit was devoted to whether the current harvest on the Valencia tract, which removes more volume than past harvests, is a departure from the exceptionally conservative approach practiced by SPR or is a reasonable silvicultural decision to open up redwood stands for increased regeneration while meeting funding goals for educational facilities. There is no danger of SPR overcutting in regards to the limits set by the NTMP or FPRs. Given the consensus that advanced regeneration needs to be encouraged and funding is required for the new field camp, the harvest and anticipated future conditions it will generate are well justified in management objectives.
5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	C	NTFPs are not currently commercially harvested.
Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.		
6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	C	
6.1.a Using the results of ***credible scientific***	C	SPR has completed a thorough assessment of the

analysis, best available information (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes: 1) Forest community types and development, size class and/or successional stages, and associated ***natural disturbance regimes***; 2) ***Rare, Threatened and Endangered (RTE) species*** and ***rare ecological communities*** (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) ***Soil resources***; and 6) ***Historic conditions*** on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.		conditions on their property in conformance with the requirements of this indicator and written up results in their respective management plan documents (NTMPs, THPs and SPR Management Plan). Under the California FPRs all THPs and NTMPs require an assessment of the current conditions on the FMU in line with items 1-6 of this indicator prior to active operations. Descriptions of the results of the assessment are included in management documents. For example, an assessment of the forest conditions in the area covered by the NTMP is required and submitted for review (Section III General Description of Plan Area). Soil resources and water resources are also described in detail in this section. Historic conditions are described in all approved plans in Section IV as part of the Cumulative Impact Assessment and historic resources are also described in narrative form in the SPR Management Plan. SPR conducts required assessments for RTE species and rare ecological and botanical communities prior to site disturbing activities. In Northern California this generally requires at a minimum standard surveys for NSO, Marbled murrelet, red legged frog and salmonids. Botanical surveys are conducted prior to each NTO as conditions warrant.
6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a. The assessment must incorporate the ***best available information***, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.	C	As required under the California FPRs, all forest managers must document the potential short and long-term impacts of their forest management activities and present their findings in the Cumulative Impact Assessment section of their management plan. Cumulative Impact Assessments cover all resources that might reasonably be impacted by management activities, including soils, biological resources, recreation, aesthetics, traffic, climate and watershed/hydrology. Apart from regulatory requirements, conversations during this year's audit indicated that all forest managers are aware of both short and long-term potential impacts due to management activities and frequently discuss and debate alternative site treatments with these issues in mind. SPR also has numerous ongoing research projects (such as

		the water quality study on Little Creek) that look at long term impacts of different site-disturbing activities.
6.1.c Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.	C	Based on the cumulative Impacts Assessment, SPR designs forest management activities that both mitigate potential impacts while moving the forest resource toward desired future conditions to achieve overall management goals, on a unit by unit basis. For example, based on the current forest conditions assessed on the Valencia tract, a harvest was designed to remove more volume than previous harvests to improve redwood regeneration. Although the harvest feels intense compared to previous harvests, the primary goal is to open up the forest and enhance regeneration. The hope is that this will promote the long term ecological viability of the forest by improving stand health and growth, leading to larger diameter trees (primarily redwood) and increased volume/acre.
6.1.d On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.	NA	
6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
FF Indicator 6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. A secondary review of the survey does not need to be included in the process. If a species is	C	Under an NTMP, harvests conducted following NTOs require updated surveys and results to ensure RTE species presence or use of the area has not changed significantly since past harvests. For example, prior to the current harvests on the Valencia tract, and in conjunction with the NTO, SPR conducted a new botanical survey and raptor surveys, the results of which were incorporated into the new sustainability analysis and submitted to CAL FIRE. Marbled murrelet surveys are also conducted on an ongoing basis – records were submitted of surveys done in 2010 and 2011 on Little Creek and the General Smith Stand.

determined to be present, its location should be reported to the manager of the appropriate database.		
6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. ***Conservation zones*** and/or ***protected areas*** are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.	C	ASP Rules – Changed 14 CCR 916.9 Threatened and Impaired Watershed Rules If surveys conducted as noted above determine RTE or sensitive species are present, SPR is required to amend management plans to ensure the protection of both the species and their habitat. This requirement is the same for THPs and NTMPs. Conservation measures undertaken by SPR are generally developed with regulatory agencies to ensure management guidelines are based on relevant science and are able to achieve conservation goals. However, recent botanical surveys, marbled murrelet surveys and raptor surveys did not find any species present which require special protections.
6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.	NA	
6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	Hunting is permitted on SPR, though it is highly regulated. Individuals deemed to have substantially contributed to the ranch are permitted to hunt in keeping with CA hunting license requirements. This currently extends to only four or five individuals. Hunting has been allowed for pigs, turkey, quail and deer.
6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	
6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented ***successional*** stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to	C	SPR has been managed with selection silviculture since the 1970's, which contributes to increased structural diversity and range of age classes represented across the forest. Although the property had been clear cut long before its current ownership and management structure, there are some individual old growth trees retained throughout the property. On the Valencia tract there is a harvest underway

natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.		that seeks to open up the canopy and create gap openings in an effort to mimic the natural gap dynamics of the redwood forest and promote redwood regeneration. This should also increase early successional stage representation.
6.3.a.2 When a ***rare ecological community*** is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, ***conservation zones*** and/or ***protected areas*** are established where warranted.	C	A number of rare ecological communities are described in the SPR Management Plan – some of these have been designated HCVF and are mapped and protected as such. For example, burl forming manzanita, a candidate for federal listing, has been identified by expert botanical surveys and is protected by SPR as HCV and noted in the management plan. No management is expected in the area anyway, as it is not forested.
6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all ***Type 1*** and ***Type 2 old growth***. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate). Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g). On public lands, old growth is protected from	C	The General Smith Stand has been identified as type 2 old growth and is protected from harvests and other activities in accordance with this indicator. CFI plots continue to be monitored in the stand to determine the stability of the old growth features. There is a second stand of residual second growth which also contains significant old growth components (type 2) and is managed as a reserve. Management, protection and monitoring of these areas is described in the HCV report.

harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate). On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where: 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected.		
6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.	C	While SPR is a relatively small ownership, its presence and continuous management as working is inherently beneficial, given the high population density and severely fragmented forest habitat of the Santa Cruz Mountains.
6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent ***aquatic habitats***; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and,	C	Management of riparian areas is undertaken in full conformance with the ASP (Anadromous Salmonid Protection) rules, which are intended to protect, maintain, and improve riparian habitats for state and federally listed anadromous salmonid species. These rules are permanent regulations and replace the interim Threatened or Impaired Watershed Rules (T/I Rules) to which SPR was managing riparian areas previously.

e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.		
Stand-scale Indicators **6.3.d** Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.	C	While SPR has a clear preference for redwood and tries to push stand composition towards redwood whenever possible, species composition is primarily reflective of that which would be found naturally on sites across the management units. Stands are pushed toward redwood during selective harvests and hardwood components are retained.
6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. ***Native species*** suited to the site are normally selected for regeneration.	C	Prior to the Lockheed fire, SPR rarely engaged in reforestation activities, since redwood sprouts enough to meet stocking without planted seedlings. Occasionally redwood would be planted in group selection harvests. However, planting has increased substantially in the burn area. SPR has begun initiating the Forest Recovery Management Plan. Treatments are proposed which include monitoring, planting, and vegetation management. Demonstration sites have been laid out to compare a variety of vegetation treatments to successfully regenerate redwood. This effort will be focused on severely burned areas with redwood site potential, some of which have been previously planted with non-native Monterey pine. Ranch staff planted over 16,000 redwood seedlings in the winter of 2010 and 2011 and they intend to plant 20,000 more in substantially damaged areas.
6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, ***snags***, and well-distributed coarse down and dead woody material. ***Legacy trees*** where present are not harvested; and b) vertical and horizontal complexity. Trees selected for ***retention*** are generally representative of the dominant species found on the site.	C	SPR has developed a solid Legacy Tree policy and program to which they continue to add as units are surveyed. The Legacy Tree report defines legacy trees and identifies the individual trees that have been surveyed thus far for protection. Snag retention is required and has been discussed during CDF inspections, though following the Lockheed fire there has been no need for snag recruitment.
6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when ***even-aged systems*** are	NA	SPR does not practice even-age silviculture.

employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region. In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.		
6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan: 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the ***best available information*** including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.	NA	
6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and	C	Please see Observation 2014.5 for description of findings.

implements a strategy to prevent or control ***invasive species***, including: 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.		
6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	Following the Lockheed fire in 2009, SPR has become highly aware of risk of wildfire, natural fire regimes, fuel management practices and needs. The SPR NTMP has been updated, and will continue to be updated, as analyses of the effects of the fire continue. A fire management plan is underway, with the assistance of other local forest management companies and agency personnel.
6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.	C	
FF Indicator 6.4.a For family forests, the forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape (see Criterion 7.1). The consultation and assessment process may be more informal; however, on all FMUs, outstanding examples of common community types (e.g., common types with Natural Heritage viability rankings of A and B) are identified in the assessment to be protected or managed to maintain their conservation value.	NC	Please see Minor CAR 2014.6 for findings.
FF Indicator 6.4.b Low risk of negative social or environmental impact. However, on all FMUs where outstanding examples of common	C	All the various special treatment areas noted in CAR 2014.6 are currently protected or managed to maintain their special values.

community types exist (see Guidance for 6.4.a.), they should be protected or managed to maintain their conservation value.		
6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.	C	As noted above, management in all special treatment areas is designed to maintain features of note. For example, in the Tranquility Flat stand (18 acres reserved for big tree management) special guidelines ensure that no more than 64 trees > 38" DHB are harvested during any entry per DFG. The area is managed to demonstrate large tree harvest treatments. SPR is fully roaded and additional roads to special areas are generally not necessary.
6.4.d The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.	C	Special treatment areas are reviewed as necessary, primarily as driven by research proposals and new survey information. Given this years' CAR these areas will also be reviewed to determine which areas technically fall under the RSA category. Areas already designated as reserves are subject to frequent research projects and proposals and new areas are often proposed for inclusion as special use areas. For example, a stretch on the upper North fork of Little Creek may be proposed as an RSA and managed according to Section V of the FPRs for special riparian management options.
6.4.e Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	NA	
6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	C	
6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	SPR conducts forestry operations as planned under approved THPs or NTMPs. These planning documents contain required guidelines for operations under the California Forest Practice Rules (FPRs) that address the

		indicators of this criterion, and give explicit instructions for operators to ensure compliance with requirements regarding site preparation, harvest layout, road maintenance, erosion control, slash management, water resource protection and WLPZ management.
6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	C	While California does not have state mandated BMPs, the California Forest Practice Rules function as a set of required management practices, guiding foresters and land managers in attaining best management practices within the constraints of state requirements for forest management. Aspects of the FPRs address all components of this criterion.
6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate.	C	No significant or unanticipated effects of management activities on harvest sites were noted during the field audit. No excessive rutting or soil compaction was noted; although the season was dry, erosion was not noted to be a problem at any of the active harvest sites visited. Cable yarding is necessary at many sites due to steep topography. SPR has begun using an SYYS on steep ground, which further minimizes soil disturbance. Ground cover disturbance was at a level to be expected with harvest operations: whole tree harvesting is not practiced nor is prescribed burning conducted due to high liability risks to the property owner. All harvests are single tree selection and operators use chain saws and other hand felling and skidding equipment for a relatively minimal impact to residual stand characteristics.
6.5.d The transportation system, including design	C	SPR is fully roaded and no new roads are being built at this

and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes: • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated.		time. Road upkeep and maintenance is regularly to minimize erosion and maintain access to all parts of the property for fire management and emergencies. Most roads are gated and access controlled – roads where access is a problem have locked gates and cameras and SPR is in active negotiations to resolve the issues. A variety of preventative measures are undertaken to minimize erosion. Rolling dips and water bars are always installed following harvests. Slash is lopped and scattered and tractor crushed on skid trails. Culverts and drainage structures are checked for failure after major rain events and outdated and damaged culverts are replaced and upgraded whenever possible.
6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written ***Streamside Management Zone*** (SMZ) ***buffer*** management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers. In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within	C	Management of riparian areas and stream buffer zones is undertaken in full conformance with the ASP (Anadromous Salmonid Protection) rules, which are intended to protect, maintain, and improve riparian habitats for state and federally listed anadromous salmonid species. These rules are permanent regulations and replace the interim Threatened or Impaired Watershed Rules (T/I Rules) to which SPR was managing riparian areas previously. Adherence to the rules ensures hydrologic conditions are maintained at a level required for productive salmonids habitat.

those SMZs. These are outlined as requirements in Appendix E.		
6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.	C	When the ASP Rules went into effect and changed the specific requirements previously listed under 14 CCR 916.9 Threatened and Impaired Watershed Rules, specific buffer zone requirements in the Water and Lake Protection Zone (WLPZ) changed. For the Coast District of the Southern Sub-district where SPR is located, Class I WLPZ for selection silviculture went from 150' to 100'. The new rules include a no cut zone in the first 30 feet of WLPZ with an 80% canopy retention requirement in the last 70 feet totaling 100'. SPR chose to maintain the original T & I rules for its NTMPs which provides for a Class I WLPZ of 150', 85% canopy in the first 75 feet and 65% canopy in the last 75 feet totaling 150 feet. SPR made this choice as they regard it as better matching the conditions on their property while ensuring adequate stream protection. This minor variation was approved through review by the relevant agencies.
6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of ***aquatic habitat.*** Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.	C	SPR makes every effort to construct stream crossings that minimize impacts on water quality and aquatic habitat. SPR frequently undertakes large projects to upgrade stream crossings, such as the current THP being planned for Scout Gulch, which will allow the upgrade of the bridge and culvert on the creek through a 1600 permit.
6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	C	Although SPR is not generally used primarily for recreation, it is accessed by a large number of people frequently for research, monitoring and education purposes. For example, many classes at Cal Poly take place at the ranch and students use the ranch for projects and class work. There is a boy scout camp used for recreation and a maintained trail system with a trail map for students to use. Use of the property for recreation is not currently at such levels as to negatively affect forest resources, though efforts are made to keep students and guests on designated roads and trails to avoid erosion and soil damage.
6.5.h Grazing by domesticated animals is controlled	C	Grazing on SPR is strictly controlled by the Livestock

to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.		Specialist, in keeping with demonstration of livestock grazing strategies. All livestock rotate through fenced paddocks.
6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.	C	
6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).	C	No chemicals are currently in use on SPR and no prohibited chemicals have been used in the past.
FF Indicator 6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Family forest owners/managers may use brief and less	C	As described under OBS 2014.5 (indicator 6.3.h), French broom is present on sites across both SPR and Valencia. Various efforts have been employed over the years to control the spread of French broom, including mowing, hand pulling, burning, brush raking and herbicide treatment. Glyphosate was applied in 2009/2010 but has not been applied since. As explained in the observation, there is an opportunity for SPR to prioritize treatment of invasive species and determine the best control methods, be they chemical or mechanical. Part of that effort should include development of a written strategy for invasive species management if chemicals are to be used.

technical written procedures for applying common over-the-counter products. Any observed misuse of these chemicals may be considered as violation of requirements in this Indicator. Whenever feasible, an eventual phase-out of chemical use is included in the strategy.		
6.6.c Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.	C	Chemicals have not been applied for forestry purposes in several years. Aerial application is never conducted.
6.6.d Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.	C	Licensed chemical applicators are contracted to apply all chemicals used for weed control and prepare the necessary paperwork. Given that chemicals have not been applied in several years there are no current chemical prescriptions.
6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.	C	SPR had a student conduct a study several years ago comparing effectiveness of different control treatments for broom. Results were recorded and monitored as a component of the study.
6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C	
6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	C	As per their contracts, forest workers have been trained in responding to equipment leaks and spills. All employees are provided active training on handling hazardous substances.
6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to	C	No spills have taken place in the past year. The CA FPRs include requirements about remediation of hazardous materials.

perform the appropriate removal and remediation, as required by applicable law and regulations.		
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	The ranch maintains a hazardous materials plan which should be updated annually, and includes an inventory of hazardous substances, MSDS, and methods for labeling, handling and disposing of hazardous materials. At this time no hazardous materials are stored for the forestry program. Fuel tanks are located on the property and have been inspected by the relevant regulatory agencies.
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	C	
6.8.a Use of ***biological control agents*** are used only as part of a pest management strategy for the control of invasive plants, ***pathogens***, insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.	C	Biological control agents have not been used on SPR. Redwood forests are generally free of disease and pests and invasive species management is achieved through conventional methods.
6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.	NA	
6.8.c If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.	NA	
6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose	C	No GMOs have been used on SPR.
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid	C	

adverse ecological impacts.		
6.9.a The use of ***exotic species*** is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	Non-native species are not currently planted on SPR and there are ongoing activities to remove non-native species when possible. There are some residual eucalyptus in some areas that were planted during previous ownership and uses of the property. Non-native Monterey pine have also been removed.
6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	NA	
6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	NA	
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.**	C	
6.10.a Forest *conversion* to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	In September of 2011 CAL FIRE approved a "Less Than 3 Acre Conversion Exemption" for SPR for a portion of the Satellite Stands Unit. The reason for the exemption is planned future construction of Field Camp Cabins to aid in the educational mission of the Ranch. The exemption area shall be removed from the NTMP harvest area. The exemption area is approximately 2.9 acres and affects approximately 2 acres within the NTMP boundary. Approximately 1.2 acres are in the Douglas-fir Timber Type and approximately 0.8 acres are in the Douglas-fir – Hardwood Timber Type, on the edge of a Shreve Oak Stand.
6.10.b Forest *conversion* to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and care related and all need to be conformed with for conversion to be allowed).	C	No HCVF are included in the conversion area described above. The proposed field camp is undergoing a full EIR currently, and two public meetings have been held to address neighbors' concerns, which are mainly regarding potential lights and noise.
6.10.c Forest *conversion* to non-forest land uses does not occur, except in circumstances where	C	As noted in 6.10.a, the conversion is in support of SPR's education mission. The conversion and subsequent

conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).		construction will allow more students to participate in classes and field work on the ranch, increasing its educational reach and exposing more students to certification and the unique forest management philosophy practiced on the ranch. It will enable more internships and more research projects to be undertaken, to better understand forest ecology and management impacts on forest systems.
6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.	C	No conversion to plantations has occurred on SPR.
6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)	C	NTMP amendment
6.10.f Areas converted to *non-forest use* for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.	C	No forest areas have been converted due to subsurface rights.
Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.		
7.1. The management plan and supporting documents shall provide: **a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions,**	C	

and a profile of adjacent lands. **b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.** **b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.**		
FF Indicator 7.1.a A written management plan exists for the property or properties for which certification is being sought. The management plan includes the following components: i. Management objectives (ecological, silvicultural, social, and economic) and duration of the plan. Guidance: Objectives relate to the goals expressed by the landowner within the constraints of site capability and the best available data on ecological, silvicultural, social and economic conditions. ii. Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information. Guidance: In addition to stand-level descriptions of the land cover, information in site-level plans may include: landscape within which the forest is located; landscape-level considerations; past land uses of the forest; legal history and current status; socio-economic conditions; cultural, tribal and customary use issues and other relevant	NC	The overarching management plan for SPR is titled "Swanton Pacific Ranch Management Plan." i. Chapter 2 addresses goals for the property in terms of management and research in keeping with the goals of the donor, Al Smith. Goals specific to forestry are listed on p.10. SPR's Forestry Philosophy, which includes broad management objectives, is described on p.76. ii. Section 8.1.1 provides an overview of the forestland by unit and resulting management considerations. Species composition, management strategy and desired outcomes are described by unit and stand. Forest resource management and inventory information is presented in section 9.5. iii. These topics are discussed throughout numerous sections of the management plan that describe management of the forest resource on SPR. Section 9.5 describes silvicultural objectives and strategies by unit. Throughout the property uneven age management is the norm and is often referenced in the management plan. iv. Both THPs and NTMPs under which harvests have already been conducted are described in section 9.6. Harvest limits and rates are described in detail

details that explain or justify management prescriptions. iii. Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used. iv. Description of harvest limits (consistent with Criterion 5.6) and species selection. Also, description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate. v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9). Guidance: Regional environmental assessments and safeguards or strategies to address pest and weed management, fire management, protection of rare, threatened, and endangered species and plant community types, protection of riparian management zones, and protecting representative samples of ecosystems and High Conservation Value Forests may be developed by state conservation agencies. Site specific plans for family forests should be consistent with such guidance and may reference those works for clarity. vi. Description of location and protection of rare, threatened, and endangered species and plant community types. vii. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8. viii. Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected		in both types of management document. In order to have approved harvest plans the documentation of harvest rates and limits has already been reviewed by a multi-agency review team as per CA FPRs. Current stand composition and desired future species composition drive species selection for harvest – this is described in section 9.6 and by unit in section 9.5. CFI plots provide accurate estimates for baseline data. v. "Habitat management considerations" are described by unit in section 8.1.1. General habitat management practices are described in section 8.2 and are in place to protect the core values of each habitat type present on the ranch and mitigate negative impacts from management. Section 8.6 lists the exotic plant species present and p.59 notes basic weed management strategies. Prevalent forest pests are described in section 8.8.4. Fire management is described in section 8.8.1. Stream protection measures are described under section 9.6.9. Goals related to specific riparian management and hydrology restoration projects are listed under section 2.3.2. Riparian corridor management is discussed throughout the management plan, in sections pertaining to unit management. vi. RTE species are described in section 8.7.1. vii. Habitat monitoring (Section 8.2.1) includes hydrological monitoring, stream flow, water quality monitoring, and forest health and growth through observations in the field and CFI plots. viii. Property maps, stand maps, hydrology and soils maps are presented in sections 1 and 5. Please see Minor CAR 2014.7 for further findings.

areas in a manner that clearly relates to the forest description and management prescriptions. Guidance: Property level maps for family forests may be simple and efficient to produce, and may cover only the necessary information needed for management to the FSC-US Family Forest Standard. At the group level, if GIS is used coverage should include protected areas, planned management activities, land ownership, property boundaries, roads, timber production areas, forest types by age class, topography, soils, cultural and customary use areas, locations of natural communities, habitats of species referred to in Criterion 6.2, riparian zones and analysis capabilities to help identify High Conservation Value Forests. Group managers may rely on state conservation agencies for complex GIS services.		
FF Indicator 7.1.b Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.	C	No violations have been issued by CAL FIRE or any other review agency cue to pre or post-harvest inspections. Field conditions noted during the audit were consistent with management objectives and stated desired future conditions of the forest resource.
7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	C	
7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.	C	The most recent version of the management plan is 2011. Both NTMPs are updated with amendments as required under the FPRs.
7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
7.3.a Workers are qualified to properly implement the management plan; All forest workers are	C	Logging crews hired have all worked SPR harvests before and are familiar to the specific requirements related to

provided with sufficient guidance and supervision to adequately implement their respective components of the plan.		certification or research areas.
7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	The most recent management plan (2011) is available on the SPR website. The website also summarizes the majority of the information in the management plan and presents it in a more user friendly manner throughout its website as a resource for those interested in the management of natural resources on the ranch.
7.4.b Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.	NA	
Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts. *Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.*		
8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	C	
FF Indicator 8.1.a For Family Forests, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol. Monitoring may be scaled to the size and intensity of the management operations that affect the resources identified in C8.2.	C	SPR conducts extensive monitoring across its entire property either in compliance with the requirements of this standard, as required by the FPRs, for the purposes of ongoing research projects and independently to assess the effects of certain prescriptions on habitat elements of note. Periodic, replicable RTE species monitoring is required by regulation and water quality monitoring according to set protocols is required following harvests (this includes road drainage/erosion monitoring following storm events).
8.2. Forest management should include the	C	

research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.		
8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	SPR maintains CFI plots in all management units and periodically re-measures to compare projected growth and standing stock in the NTMPs against actual growth measured. This occasionally results in an amendment to the sustainability analysis of the relevant management plan.
8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	There has been no significant unanticipated removal in the past year. The last significant fire was the Lockheed Fire in 2010. In March of 2011 SPR began submitting amendments to the SPR NTMP detailing a description of the fire, damage to the forest resource and salvage harvest operations.
8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	FORSEE was utilized for the first time for the Valencia Creek tract to track growth and yield and removals. Scaling reports record all harvest data, including volume and grade by species, and are maintained by SPR. NTFPs are not commercially harvested.
8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: 1) Rare, threatened and endangered species and/or their ***habitats***; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4).	C	SPR is required to periodically monitor for all RTE species, both flora and fauna, when suitable habitat exists or when species presence is determined. SPR submitted the most recent Marbled Murrelet survey reports, the botanical survey amendments to the Valencia NTMP and the updated Legacy Tree Report as evidence of periodic monitoring. HCVF monitoring is detailed in the separate report "High Conservation Values on Swanton Pacific Ranch."
8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site	C	The consulting forester and ranch Resource Manager are regularly on site during harvests to ensure the plan is being followed. Post-harvest inspections are conducted per

disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.		CalFire requirements and road/water quality monitoring per RWQCB protocols.
8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.		As noted above, water quality monitoring per RWQCB protocols is conducted over the five year timeframe required and in some instances for longer if elected. As a component of this road drainage is checked after all significant rain events during winter conditions to ensure water quality is not compromised by runoff or failed culverts.
8.2.d.3 The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	SPR is in regular contact with all neighbors, those with whom they share access roads, contractors and university stakeholders to keep them apprised of management decisions and harvest schedules that may impact them. Issues that arise as a result of forestry operations (disputes, negotiations, changes to product sales and marketing) are monitored as necessary.
8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.	C	All disputes and negotiations are closely monitored to ensure satisfactory outcomes for all parties. A contact for general comments on SPR has been added to the website.
8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	Culturally significant sites that require ongoing monitoring have not been found on SPR. Cultural sites are generally limited in the redwood Douglas fir forests.
8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	The Forestry Fund budget is calculated every year, incorporating projected revenue from timber sales.
8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	C	
8.3.a When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	The entire SPR is under the scope of the certificate, effectively eliminating the risk of mixing certified and non-certified wood. Load tickets and scaling reports link the loads of wood back to the harvest unit.
8.3.b The forest owner or manager maintains documentation to enable the tracing of the	C	Please see Observation 2014.8 for description of findings.

harvested material from each harvested product from its origin to the point of sale.		
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	C	
8.4.a The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	C	Pre and post-harvest inspections ensure management plans are being effectively followed. CFI plot measurements, scaling reports and FORESEE projections document growth and removals over time to track standing stock. Significant deviations from management objectives are noted in plans when they occur. The only such instance so far has been radical changes in harvest plans for areas affected by the Lockheed fire.
8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.	C	When events occur that require radical management actions that are a significant deviation from those prescribed in the management plan, the relevant management plan is updated. For example, the SPR NTMP has undergone significant amendments incorporating the post fire damage, inventory and salvage harvests into future planning and management goals.
8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	C	
8.5.a While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	C	SPR managers and Cal Poly faculty engage in a very diverse array of monitoring activities on the certified forest related to ongoing research, regulatory requirements and compliance with certification. The SPR website has been recently updated to include more monitoring information, including past FSC audit reports, NTOs, NTMP amendments, and the Legacy tree report. Under FSC certification tab is the addition of a link to the Cal Poly Digital Commons, which can be searched for all relevant research papers.
Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.		

High Conservation Value Forests are those that possess one or more of the following attributes: **a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance** **b) Forest areas that are in or contain rare, threatened or endangered ecosystems** **c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)** **d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).**		
9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	C	
9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F. Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.	C	SPR undertook a full HCVF assessment in 2005 in accordance with the required assessment process. HCVs were identified under categories 1 (Coho Salmon Habitat, Steelhead Trout Habitat, Red-Legged Frog Habitat, Monterey pine forests), 3 (Burl forming manzanita stands, General Smith Stand, Second Growth Reserve, Old redwood, Douglas-fir, and California nutmeg specimens) and 4 (Inner Gorge of Valencia Creek). Maps of HCVF have been included in multiple reports, including the Legacy Tree Report and "High Conservation Values of Swanton Pacific Ranch," which is also available on the ranch website.
FF Indicator 9.1.b In developing the assessment, the forest owner or manager consults with databases, qualified experts, and/or best available research and literature.	C	The HCVF assessment was undertaken in response to a CAR, which included the necessary consultation requirements. In conducting the HCVF assessment SPR made use of the wealth of qualified experts in forestry, redwood forests, botany of the Santa Cruz Mountains, anadromous fish ecology, etc., with whom they have consulted and/or contracted in the past and with faculty in the Natural Resources Management department of Cal Poly.
9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	Please see Observation 2014.9 for further findings.
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the	C	

maintenance thereof.		
9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.	C	All the areas identified during the assessment for designation as HCVF are managed under approved NTMPs. The approval process includes multi-agency review by qualified experts in each discipline covered under the plan (forestry, fisheries, geology, etc.) and a mandatory public comment process.
9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	NA	
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.	C	
9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.	C	The Swanton Pacific Ranch Management Plan, the Valencia NTMP and the Swanton Pacific Ranch NTMP provide the operational measures necessary for HCV management. SPR does not use a separate planning document with prescriptions specific for HCVF, rather these are incorporated into the existing management plans. In all management decisions SPR applies the precautionary principle to ensure no negative impacts are occurring, based on monitoring results. The report "High Conservation Values on Swanton Pacific Ranch" includes a table detailing the specific prescriptions for each designated HCV.
9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	C	All management activities described in the documents and plans mentioned above are designed to maintain and, where feasible, enhance the values identified in the HCVF assessment.
9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	C	Maps of HCV areas designated due to species of special concern do not indicate that the designated areas cross ownership boundaries. The General Smith Stand which is designated HCVF due to the presence of old growth, abuts the property boundary, necessitating management of the HCV by the adjacent property owner. In this case, that owner is Big Creek, who is also committed to maintaining

		the stand in its current condition.
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8. FF Indicator: Low risk of negative social or environmental impact for private family forests. Public lands must follow the requirements in Indicator 9.4.a.	C	SPRs monitoring for designated HCVF areas is described in the above mentioned table (9.3.a) under the column "Current Monitoring for compliance, effects, effectiveness, status." Certain HCVs are also monitored per FPR requirements and/or state/federal requirements, e.g. ESA.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	Increased risk has not been determined for any HCVs being monitored.

Appendix 6 – Tracking, Tracing and Identification of Certified Products

SCS FSC Chain of Custody Indicators for Forest Management Enterprises, Version 5-0

REQUIREMENT	C/NC	COMMENT / CAR
1. Quality Management		
1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization's compliance with all applicable requirements of this standard.	C	Steve Auten, Ranch Operations Manager, is in charge of forestry operations at SPR, including ensuring proper CoC procedures are followed.
1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	Records of all sales are maintained at the SPR office and integrated into budgets submitted to the university annually.
1.3 The FME shall define its forest gate(s) (check all that apply): *The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.*	C	[X] **Stump** *Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.* [ ] **On-site concentration yard** *Transfer of ownership of certified-product occurs at concentration yard under control of FME.* [ ] **Off-site Mill / Log Yard** *Transfer of ownership occurs when certified-product is unloaded at purchaser's facility.* [ ] **Auction house / Brokerage** *Transfer of ownership occurs at a government-run or private auction house / brokerage.* [ ] **Lump-sum sale / Per Unit / Pre-Paid Agreement** *A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.* [ ] **Log landing** *Transfer of ownership of certified-product occurs at landing / yarding areas.* [ ] **Other** *(Please describe):*

1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.	C	The entire SPR is under the scope of the certificate, effectively eliminating the risk of mixing certified and non-certified wood. Load tickets and scaling reports link the loads of wood back to the harvest unit.
1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. *NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips / biomass originating from the FMU under evaluation.*	C	No on site processing is done by SPR.
2. Product Control, Sales and Delivery		
2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).	C	Log loads are identified as certified on the load tickets and segregated at the log yard.
2.2 The FME shall maintain records of quantities / volumes of FSC-certified product(s).	C	Scaling reports provide detailed records of all certified loads coming off SPR.
2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information: a) name and contact details of the organization; b) name and address of the customer; c) date when the document was issued; d) description of the product; e) quantity of the products sold; f) the organization's FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: i. the claim "FSC 100%" for products from FSC 100% product groups; ii. the claim "FSC Controlled Wood" for products from FSC Controlled Wood product groups. h) If separate transport documents are	C	Please see OBS 2014.8 for findings. The required information is provided through the load tickets.

issued, information sufficient to link the sales document and related transport documentation to each other.		
2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product. **Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2**	C	The load ticket provides the necessary information and is included with the logs for transport.
2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence. *FSC-ADVICE-40-004-05*	NA	
3. Labeling and Promotion		☐ **N/A**
3.1 Describe where / how the organization uses the SCS and FSC trademarks for promotion.	C	SPR uses the FSC and SCS trademarks on its website.

3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.	C	Please see OBS 2014.8 for findings.
3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.	C	Email communication was made available upon request.
4. Outsourcing		[X] **N/A**
4.1 The FME shall provide the names and contact details of all outsourced service providers.		
4.2 The FME shall have a control system for the outsourced process which ensures that: a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use.		
5. Training and/or Communication Strategies		
5.1 All relevant FME staff and outsourcers shall be trained in the FME's COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME's COC control system.	C	Given the minimal scale of operations and the straightforward nature of the supply chain, CoC training is done on site during sales.
5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).	C	Whoever is present on site during the pre-op meetings have been trained. These people are listed in the records of the harvest and sale as the log crew and consulting forester and SPR staff.

Appendix 7 – Peer Review and SCS Evaluation Team Response to Peer Review

No peer review is required for this recertification report.

Appendix 8 – SLIMF Eligibility Criteria

An FMU qualifies as a 'SLIMF' if it is either a 'small' FMU OR managed as a 'low intensity' FMU. Any SLIMF FMU under the scope of the FME under evaluation must meet at least one of the following criteria:

☐ **N/A – none of the FMU(s) under evaluation qualify as a SLIMF according to the criteria below.**	
☒ **'Small' FMU(s)**	☐ The scope of the certificate includes FMU(s) of 100 ha (247 acres) or less.
	☒ The scope of the certificate includes FMU(s) located in a country for which the definition for maximum size of "small" is larger than 100 ha (247 acres), but does not exceed 1,000 ha (2, 471 acres).
	☐ The scope of the certificate includes FMU(s) of 1000 ha (2,471 acres) or less where there is no FSC-accredited national initiative and the national stakeholders support the larger size-limit proposed by the certification body.
☒ **'Low intensity' FMU(s) –** The scope of the certificate includes FMU(s) in which the rate of harvest is less than 20% of the mean annual increment (MAI) AND these FMUs meet one of the following additional criteria:	☒ The annual harvest from the total production forest area is less than 5000 cubic meters (2.1 million board feet).
	☐ The average annual harvest from the total production forest is less than 5000 m3 / year (2.1 million board feet / year) during the period of validity of the certificate as verified by harvest reports and surveillance audits.