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

Maryland Department of Natural Resources- Forest Service
Chesapeake Forest Lands & Pocomoke State Forest

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

CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00069P

Submitted to:

State of Maryland
Department of Natural Resources – Forest Service
580 Taylor Avenue
Annapolis, Maryland 21401 USA

Authored by:

Michael Thompson
Michael Ferrucci
Kathryn Fernholz

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Certified: April 29, 2004
Recertified: April 29, 2009

By:

SCIENTIFIC CERTIFICATION SYSTEMS
2200 Powell St. Suite Number 725
Emeryville, CA 94608, USA
www.scscertified.com

SCS Contact: Dave Wager dwager@scscertified.com
Client Contact: Jack Perdue, Public Lands Stewardship, jperdue@dnr.state.md.us

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the SCS website (www.scscertified.com) prior to issuance of the certificate. Section B contains more detailed results and information for the use of the Maryland Forest Service.

Foreword

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by the Maryland Forest Service to conduct a certification evaluation of its Chesapeake Forest Lands and the Pocomoke State Forest. Under the FSC/SCS certification system, forest management operations meeting international standards of forest stewardship can be certified as "well managed", thereby enabling use of the FSC endorsement and logo in the marketplace.

In March 2009, an interdisciplinary team of natural resource specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 4-day field and office audit of the subject properties as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team determined conformance to the 56 FSC Criteria in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to the Maryland Forest Service for the management of its Chesapeake Forest Lands and the Pocomoke State Forest. In the event that a certificate is awarded, Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

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Section A- Public Summary and Background Information

1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	Maryland Department of Natural Resources – Forest Service
Contact person	Jack L. Perdue, Public Lands Stewardship
Address	580 Taylor Avenue, Annapolis, MD 21401
Telephone	410-260-8505
Fax	410-260-8595
E-mail	jperdue@dnr.state.md.us
Certificate Number	SCS-FM/COC-00069P
Certificate/Expiration Date	April 29, 2014
Certificate Type	Single FMU
Number of FMU's *if applicable*	1
Number of FMUs in scope that are	
less than 100 ha in area	0
100 - 1000 ha in area	0
1000 - 10 000 ha in area	0
more than 10 000 ha in area	1
Location of certified forest area	Salisbury, MD (population center)
Latitude	75°35'12.92" W
Longitude	38°22'17.22" N
Forest zone	Temperate
Total forest area in scope of certificate which is included in FMUs that:	
are less than 100 ha in area	0
are between 100 ha and 1000 ha in area	0
meet the eligibility criteria as *low intensity* SLIMF FMUs	0
Total forest area in scope of certificate which is:	
privately managed[1]	0

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

state managed	81,917 ac (33,151 ha)[2]
community managed[3]	0
Number of forest workers (including contractors) working in forest within scope of certificate	12
Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	7,915 acres (3,203 ha)
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Area of forest classified as 'high conservation value forest'	10,572 acres (4,279 ha)
List of high conservation values present[4]	HCV 1.1, 1.2, 3, 4.1, 4.2, and 5
Chemical pesticides used	Roundup (Glyphosate) Arsenal (Imazapyr) Razor Pro (Glyphosate) Oust Extra (Sulfometuron/Metsulfuron) Escort XP (Metsulfuron-methyl)
Total area of production forest (i.e. forest from which timber may be harvested)	64,985 acres (26,300 ha)
Area of production forest classified as 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF)	15,198 acres (6,151 ha)
Area of production forest regenerated primarily by replanting[5]	0[6]
Area of production forest regenerated primarily by natural regeneration	64,985 acres (26,300 ha)
List of main commercial timber and non-	Loblolly pine (*Pinus taeda*)

[2] Note: Vision Forestry, a private corporation, assists the State of Maryland with certain management activities.

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

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

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

[6] Although many stands originated as plantings in agricultural fields, they are now managed as natural forests.

timber species included in scope of certificate (botanical name and common trade name)	
Approximate annual allowable cut (AAC) of commercial timber	Loblolly pine: Sawtimber: 30 million board feet Pulp: 60,000 tons
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products (include basic description of product - e.g. round wood, pulp wood, sawn timber, kiln-dried sawn timber, chips, resin, non-timber forest products, etc.)	Round wood, pulp wood, chips

Conversion Table English Units to Metric Units

Length Conversion Factors

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

Area Conversion Factors

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

Volume Conversion Factors

Volume

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

1 acre	= 0.404686 hectares
1,000 acres	= 404.686 hectares
1 board foot	= 0.00348 cubic meters
1,000 board feet	= 3.48 cubic meters
1 cubic foot	= 0.028317cubic meters

1,000 cubic feet = 28.317 cubic meters

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

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

1.2 Management Context

The Chesapeake Forest Project consists of lands that were formerly privately owned by companies involved in the forest products industry. The lands were purchased from these companies through a multi-party conservation agreement and turned over to the State of Maryland to be managed by the Department of Natural Resource's Forest Service. Forest Service management of the Chesapeake Forest Project lands has been facilitated through a contract with Vision Forestry, a private consulting company. Vision Forestry is still involved in management of the Chesapeake Forest, but the Forest Service has taken an increasingly lead role as the project matures. By way of contrast, the Pocomoke State Forest has been in the Maryland State Forest system for many years and is managed exclusively by Maryland Forest Service staff.

Pertinent Regulations at the Federal Level:

a) Endangered Species Act
b) Clean Water Act (Section 404 wetland protection)
c) Occupational Safety and Health Act
d) National Historic Preservation Act
e) Archaeological and Historic Preservation Act
f) Americans with Disabilities Act
g) U.S. ratified treaties, including Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

Pertinent Regulations at State and Local Level:

<u>Management Programs and Initiatives</u>

- ***Chesapeake Bay Program*** – An estuary program involving State and Federal agencies within Maryland, Virginia, Pennsylvania, and District of Columbia working to protect and restore the Chesapeake Bay.
- ***Smart Growth*** – The State of Maryland has launched a growth management initiative to reduce suburban sprawl by directing development toward existing urban centers and away from rural areas.
- ***Rural Legacy*** – Local governments define targeted rural areas for protection from development through easements and purchase. Lands within local rural legacy areas are eligible for State Rural Legacy funding.

- ***Green Infrastructure*** – Department of Natural Resources (DNR) has developed a targeting program to identify ecologically important nodes and corridors to be used in planning efforts at the State and local levels.
- ***Clean Water Action Plan*** – In response to the Federal Clean Water Act, DNR developed a targeting and ranking process to identify watersheds for protection and restoration in Maryland.
- ***Lower Eastern Shore Conservation and Restoration Action Strategy*** – DNR, in conjunction with local interests, developed an action strategy to address water quality concerns in targeted watersheds on the lower Eastern Shore.

Regulatory Programs

- ***Discharge Permits*** – Maryland Department of the Environment (MDE) issues permits placing limits on pollutants from point sources, including wastewater treatment plants and industrial plants.
- ***Nutrient Management Program*** –Maryland Department of Agriculture (MDA) ensures that all farmers follow nutrient management plans for their agricultural operations.
- ***Pesticide Regulation and Applicator Certification Program*** – MDA requires licenses for all businesses engaged in commercial pesticide application or recommendations.
- ***Septic System Regulations*** – MDE and local health departments set standards and requirements for septic system installation on individual properties.
- ***Total Maximum Daily Load (TMDL)*** – MDE sets upper limits for the amount of pollutants that can be discharged from any source to impaired water bodies.
- ***Critical Area Program*** – The Critical Area Commission and local governments regulate development within 1,000 feet of tidal waters of the Bay and limit disturbances to buffers within the first 100 feet.
- ***Stormwater Management*** – MDE and local governments require site plans and installation of stormwater management facilities for development projects.
- ***Forest Conservation Act*** – DNR and local governments require plans for forest conservation and possibly mitigation for development projects that clear greater than 40,000 square feet of forest.
- ***Erosion and Sediment Control*** – Local Conservation Districts require sediment and erosion control plans for activities that may cause land disturbance or erosion.

Incentive Programs

- ***Conservation Reserve Enhancement Program*** – A joint United States Department of Agriculture (USDA)/State program that provides rental payments and cost-share funds to farmers willing to take eligible farmland out of production and to install conservation practices including forested riparian buffers, wetlands, and filter strips.
- ***Environmental Quality Incentive Programs*** – A USDA program that provides farmers with incentives and cost-share to implement a variety of conservation practices designed to improved water quality.
- ***Maryland Agricultural Cost-Share Program*** – An MDA program that provides farmers cost-share for a variety of conservation practices designed to improve water quality.
- ***Biological Nutrient Removal Program*** – MDE offers municipalities 50% cost-share to upgrade wastewater treatment plants with biological nutrient removal.

- ***Stormwater Pollution Control Program*** – MDE provides financial assistance to local governments for implementing stormwater management retrofits and conversion projects in existing developed areas.
- ***Coastal Non-point Source Program/Non-point Source Management Program/Clean Water Act Section 319 Grants*** – These programs provide financial assistance for implementing projects that reduce non-point source pollution.

1.2.1 Environmental Context

The lands that were the subject of this assessment occur on Maryland's Lower Eastern Shore, which encompasses Caroline, Dorchester, Somerset, Wicomico, and Worcester Counties. This region is sometimes included in an area referred to as Delmarva, or the Delmarva Peninsula, which includes the State of Delaware and two counties in Virginia, in addition to the Eastern Shore counties of Maryland.

The region is surrounded on two sides by the Atlantic Ocean and Chesapeake Bay and it is classified as being part of the Middle Atlantic Coastal Forest (World Wildlife Fund No. NA0517). According to the World Wildlife Fund, the Middle Atlantic Coastal Forest extends from Maryland's Eastern Shore south to the Georgia-South Carolina border. The ecosystem as a whole ranks among the top ten eco-regions of the United States and Canada in reptile, bird, and tree species diversity. Bottomland forests in this region are particularly rich in biodiversity.

The region is a mix of lowland flats, freshwater swamps, salt marshes, forested and non-forested wetlands, and uplands. The climate is temperate, semi-continental and relatively uniform, with hot and humid summers and somewhat mild winters. Drought is common and the region is occasionally impacted by hurricanes.

Native American burning and over 300 years of agriculture and industry have influenced Maryland's Eastern Shore forests. Forests in the region are currently dominated by loblolly pine, but historic land cover is thought to have been dominated by hardwood forests mixed with pine softwoods. Oak species likely included white oak, willow oak, pin oak, and cherry bark oak. Other naturally occurring hardwoods included sweet gum, silver and red maple, black gum, dogwood, birch, beech, bay, and holly. Loblolly pine, shortleaf pine, and Virginia pine were also present, but may not have occurred in pure stands until areas had been cleared of hardwoods for agriculture.

Forests in the region are now highly fragmented and the natural fire cycle has been disrupted by fire suppression. Almost 70 percent of the forest is now found in pine plantations. The remaining lands are a mix of pine/hardwood, mixed hardwoods, riparian areas, and wetlands.

Major environmental concerns within the region include loss of habitat to development, forest fragmentation, restoration of natural forests, and impaired water quality (particularly for waters draining into Chesapeake Bay).

1.2.2 Socioeconomic Context

The earliest settlers in the region were Native American hunter-gatherers who also developed agriculture, using fire extensively as a tool for land clearing. Their fire management practices are thought to have been an important influence on the forest composition of the region, favoring species like pine and oak that have a higher fire tolerance.

English settlers arrived in the region in the mid-1600s (ca 350 years BP) and many forests were converted to agricultural uses. The widespread destruction of Maryland's forests, however, began in the 18th century when there were estimated to be as many as 18 iron forges at the start of the Revolutionary War.

The conversion of forests to agricultural uses peaked in the early 20th century and some abandoned farms have now reverted to forest. In the entire Lower Eastern Shore area, current land uses are: urban (5%), agriculture (25%), forest (30%), water (30%), and wetlands (10%). The main agricultural enterprise is raising poultry as broilers, although other forms of livestock are also raised, and feed crops are grown for livestock.

Forest products represent a significant source of income within the Eastern Shore region, with loblolly pine (approximately 90 percent of all wood being used in the region) being the most profitable species. Many products are processed locally, and there is a strong desire to keep the State Forests in active forest management to help maintain the forest products sector of the economy.

Approximately 205 million board feet of pine sawtimber, hardwood sawtimber, and pine pulpwood is consumed on an annual basis on the Lower Delmarva Peninsula. Much of this material is utilized by seven pine sawmills and two pine pulpwood chipping operations for paper making. The pine mills produce a variety of products, including piling, utility poles, building poles, dimensional lumber, and decking. Three hardwood sawmills also operate in the region and produce timbers, construction lumber, railroad ties, pallet stock, and some high quality lumber.

1.3 Forest Management Enterprise

1.3.1 Land Use

The subject lands are owned by the State of Maryland and there are no known cases where this ownership is being legally challenged. In a few areas, the lands are encumbered by easements for transmission lines, pipelines, public roads, and minor rights-of-way.

When the Chesapeake Forest Project lands were purchased and transferred to the State, a variety of private clubs had leases allowing use of the properties for hunting. The hunt club lease program continues on these lands, with a portion of the leases held by the traditional clubs and the remainder being made available to the public through a lottery system.

As public lands, the subject properties are used for a wide variety of public uses, including hiking, riding horses, canoeing, and picnicking. The Pocomoke State Forest also contains an off-road vehicle (ORV) trail that was mandated by State legislation.

1.3.2 Partial Certification- Land Outside Scope of Certification

The areas within the scope of this certificate, Chesapeake and Pocomoke Forests, are part of the Maryland State Forest system that is managed by the Forest Service. The Forest Service has plans to certify its remaining State Forests over time. The primary reason for not yet seeking certification on the other lands is limited resources. The Maryland Forest Service's webpage http://www.dnr.state.md.us/forests/mdforests.asp provides information on all of the lands that the Maryland Forest Service manages. The audit team is unaware of any serious failures with FSC on the non-certified lands. For further assurance that serious failures with the FSC standard are not occurring on the other lands- SCS has issued Minor CAR 2009.2. Chain-of-custody controls are in place to ensure that there is no confusion over log sales from the non-certified State Forests.

1.4 Management Plan

1.4.1 Management Objectives

The Chesapeake and Pocomoke Forests have separate management plans, but they are managed according to an overall set of Forest Service management objectives that include:

- Providing a steady flow of economic activity and employment to support local businesses and communities;
- Preventing the conversion of forested lands to non-forest uses in a region where the forests were already heavily fragmented by agricultural and urban uses;
- Contributing to improvements in water quality as part of a larger effort to restore Chesapeake Bay;
- Protecting and enhancing habitat for threatened and endangered species;
- Maintaining soil and forest productivity and health; and
- Protecting visual quality and sites of special ecological, cultural, or historical interest

Management plans for both forests are available to the public on the Forest Service's web site (http://www.dnr.state.md.us/Forests/).

1.4.2 Forest Composition

Forests of the region are dominated (approximately 73%) by hardwood stands comprised of oak-pine, oak-hickory, oak-gum-cypress, elm-ash-cottonwood, and maple-beech-birch associations. The majority of harvests, however, focus on loblolly-shortleaf pine stands that represent approximately 27% of the Eastern Shore forest. Many of the loblolly forests of today originated from planting abandoned agricultural lands. Although the Forest Service considers supplemental planting as an appropriate management tool, these loblolly pine stands are now managed as natural forests.

From an ecological perspective, important habitat types, especially for neo-tropical migrants, include

pine savannah, forested wetlands, freshwater/brackish wetlands, upland mixed forests, early successional scrublands, and pine plantations.

1.4.3 Silvicultural Systems

The State Forests are typically divided into five management zones: 1) visual quality areas (e.g., vistas and scenic views), 2) wildlife zones, 3) special areas (e.g., cemeteries and rare plant habitat), 4) water quality protection zones, and 5) general forest management areas. Within the general forest management area there are two primary management situations: 1) mixed pine-hardwood and mixed hardwood forests (about 10% of the general forest area), and 2) pine management areas (about 90% of the general forest area).

Most of the pine-hardwood and mixed hardwood forests are managed toward mature stands of mixed timber, with selection harvesting and small-opening harvests designed to encourage regeneration of desired species such as oak. A minimum post-harvest basal area of 70 square feet is the target in selection harvests.

Pine stands are dominated by loblolly pine and are managed in two different zones: 1) areas designated as a high priority for Delmarva fox squirrel habitat (DFS) and Forest Interior Dwelling Birds (FIDs), and 2) general management areas. The Delmarva fox squirrel is a federally listed endangered species under the Endangered Species Act.

In the DFS high priority core areas, rotations are lengthened and hardwoods are encouraged in the overstory. The goal is to grow larger trees and maintain them for longer periods on the landscape. In general management areas, stands are managed on a 30-40 year rotation for a mixture of sawlogs and pulp. Some younger stands, however, may be harvested early to balance out the age class distribution, which is currently skewed to stands less than 25 years old, to avoid future wood supply problems. The general silvicultural system employed in pine stands includes: 1) pre-commercial thinning, 2) commercial thinning, 3) clearcutting, 4) site preparation, and 5) planting, where necessary, potentially followed by herbicide applications.

1.4.4 Management Systems

The subject lands are managed by the Maryland Forest Service with assistance from Vision Forestry on the Chesapeake Forest lands. The Forest Service's staff includes forest technicians, foresters, planners, and supervisory professionals. Additional DNR staff – including fish and wildlife biologists – also work regularly on the subject forests and the Forest Service can call on other State agencies when specific assistance is needed (e.g., when addressing historical resources). Maryland's Wildlife and Heritage Service works particularly closely with the Forest Service on issues related to rare, threatened, and endangered plants, animals, and natural communities.

A key element within the management system is the interdisciplinary review of annual work plans. This review is conducted prior to implementing management activities and includes input from

foresters, biologists, and supervisory staff. The Wildlife and Heritage Service is available for additional comment as management plans are implemented, and this group may take the lead on implementing management programs in cases where ecological resources are particularly sensitive.

1.4.5 Monitoring System

Monitoring of the Chesapeake and Pocomoke State Forests occurs at the landscape level, at the stand/complex-level, and for project-specific assessment and research. At the landscape level, forest managers maintain a GIS that includes recent aerial photography, stand/community type polygons, known locations of rare species and natural communities, and the location of features of historic or cultural significance. This information is periodically updated and used to compare conditions on the forest over time.

Both forests are subject to Continuous Forest Inventory (CFI) sampling that provides data on forest composition and growth. Harvests are monitored through GPS survey of actual harvest boundaries and post-harvest cruises. The volume of harvested forest products is also maintained in a Forest Service database.

Ecologists with the Wildlife and Natural Heritage Service inventory rare species and natural community occurrences and monitor the effects of management activities in ecologically sensitive areas (e.g., monitoring plant community development following prescribed burning).

The Forest Service seeks public input on its management efforts through a Citizen's Advisory Committee and via public comment on management plans and annual work plans. Staff members also monitor public opinion when members of the public are encountered on State Forest lands.

1.4.6 Estimate of Maximum Sustainable Yield

The Sustainable Forest Management Plan for the Chesapeake Forest was updated in 2009 and includes an estimate of the maximum sustainable yield; the plan is available to the public on the Forest Service website and the description of the estimate is contained in Appendix J. The current model is spatially explicit and based on the Woodstock software system (see www.remsoft.com). The forest has been divided into modelling themes that include primary forest type (e.g., loblolly pine, Atlantic white cedar), management area designation (e.g., Delmarva fox squirrel core area, Ecologically Significant Area, General Forest Management Area), thinning status, and regeneration status. The model is being populated with the best available data and current estimates of maximum sustained yield for pine range from approximately 170,000 tons to 220,000 tons.

Recent CFI data for the Pocomoke State Forest have also been analyzed and suggest annual net growth for sawtimber of over 2.5 million board feet (1.8 million board feet of which is loblolly pine).

1.4.7 Estimated, Current and Projected Production

Harvest rates over the last 5 years have been well below the AAC due, generally, to poor weather

conditions (i.e., too much rain). Current conditions have improved somewhat and it is hoped that production rates will approach the estimated AAC. It is unlikely, however, that production rates will exceed the AAC – in an attempt to catch up with past low production – due to constraints associated with available contractors and available management time.

1.4.8 Chemical Pesticide Use

Chemicals are used in even-aged management prescriptions to control competing vegetation and they are also used to control road-side vegetation and to reduce invasive species. Herbicides are applied by licensed applicators and include Roundup®, Arsenal®, Razor Pro®, Oust®, and Escort XP®.

2.0 Guidelines/Standards Employed

For this annual audit, the SCS audit team evaluated the extent of conformance with the FSC Southeastern Regional Standard (Version 10.0), which was endorsed by the FSC in February 2005.

3.0 THE CERTIFICATION ASSESSMENT PROCESS

3.1 Assessment Dates

The assessment began in March 2009 with notification of the pending evaluation and preliminary consultation with stakeholders. The field portion of the assessment took place during March 23-26, 2009.

3.2 Assessment Team

Michael Thompson, M.Sc.: Michael Thompson is a Certified Wildlife Biologist and Principal of the firm Penobscot Environmental Consulting, Inc., located in Yarmouth, Maine. He is a graduate of the University of Idaho, with a degree in Wildlife Resources, and received his M.Sc. degree in Wildlife Management from the University of Maine. Mr. Thompson was a member of the FSC's Northeast Regional Standards Working Group and has conducted FSC audits in Maine, Connecticut, Maryland, West Virginia, Pennsylvania, Tennessee, Indiana, Idaho, Ontario, and New Brunswick. He was also the Team Leader for SCS's initial evaluation of the Chesapeake Forest Lands.

Michael Ferrucci, M.F.: Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 20 years. Its clients include private citizens, land trusts, municipalities, corporations, private water companies, and non-profit organizations. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and

silviculture of natural forests of the eastern United States. He is a member of the Forest Practices Advisory Board of the State of Connecticut, and past Chairman and Executive Committee member of the Connecticut Tree Farm Committee. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies. Mr. Ferrucci's has conducted numerous FSC audits, and he has lead a number of audits under the AF&PA's Sustainable Forestry Initiative program, including the FSC-SFI certification of the Chesapeake Forest Lands in 2003.

Kathryn Fernholz: Kathryn Fernholz led the stakeholder consultation for the assessment. Kathryn has worked on development and forest management issues in a range of roles. Since 2006 Kathryn has served as Executive Director of Dovetail Partners, Inc., a Minneapolis-based non-profit. Previously, while employed with a consulting firm, Kathryn was a member of the environmental department and assisted with natural resource inventories, reporting, and environmental impact assessments including the use of Geographic Information Systems (GIS). While working with the Community Forestry Resource Center, Kathryn managed a group certification project for family forests and worked to increase local capacity to provide forest management and marketing services that are compatible with certification standards. Kathryn has served as Chair of the Minnesota Chapter of the Society of American Foresters and filled an appointment to the Minnesota Forest Resources Council. Kathryn has a B.Sc. degree in forest resources from the University of Minnesota, College of Natural Resources, and also studied at the College of Saint Benedict in St. Joseph, MN, and Sheldon Jackson College in Sitka, Alaska.

3.3 Assessment Process

3.3.1 Itinerary

Monday, March 23 8:15 am to 6:30- pm

Time	*Activity*
8:00 am	Auditors arrive at Vision Forestry Offices
8:15 am	Opening Meeting and Office Discussions Changes to the CFP forest management program Overview of the Pocomoke State Forest Harvest planning (Pocomoke Forest mainly; also CFP) Ecological Protections (all lands) Adaptive Management Summary (what you've learned thus far)
Noon	Review Selected Sales and Finalize Field Visit (1 tour)
12:30 to 5 pm	Field Site Visits, Pocomoke State Forest
5 pm	Daily Briefing (at final field site)
6 pm	Dinner (auditors joined by DNR personnel as available)

Tuesday, March 24 8 am to 5 pm

Time	*Activity*
7:45 am	Auditors arrive at Vision Forestry Offices
8:00 am	Review Selected Sales and Finalize Field Visits (2 separate tours)
8:15 – 5 pm	Field Site Visits
6 pm	Dinner (with informal daily briefing)

Wednesday, March 25 8 am to 5 pm

8 am- 1 pm	Field sites Pocomoke and CFP (one tour of local sites)
1 pm -	Auditor private discussion
6 pm	Dinner (auditors on their own)

Thursday, May 26 8 am to 11 am

8:00 am	CFP Office – discuss remaining issues
8:45 - 9:30 am	Final SFI Exit Briefing
9:30 - 11 am	Final FSC Exit Briefing
12:25 pm	Thompson / Ferrucci flight from Salisbury airport

3.3.2 Evaluation of Management System

This was the 5-year re-evaluation for the Chesapeake Forest, so the team has had ample opportunity to evaluate the public/private partnership with the Maryland Forest Service and Vision Forestry. Nonetheless, a portion of the audit was devoted to group meetings and individual interviews to ascertain the current status of the management system on the Chesapeake Forest. Where this was the first evaluation of the Pocomoke State Forest, more time was spent on interviews to ensure that the management programs observed on the Chesapeake Forest over the last 5 years were also being employed on the Pocomoke.

3.3.3 Selection of FMU's to Evaluate

The certified forest consists of two FMUs, the Chesapeake Forest and the Pocomoke State Forest. Both FMUs were selected for evaluation given that it was the 5-year re-evaluation of the Chesapeake and the first evaluation of the Pocomoke.

3.3.4 Sites Visited

Monday March 23, 2009

1. ***Milburn Landing Tract (Compartment 27).*** 40-acre pine plantation scheduled for first thinning;
2. ***Milburn Land Tract (Compartment 28).*** 17.4-acre regeneration harvest. Currently monitoring natural regeneration to determine if fill-planting will be warranted;
3. ***Milburn Landing Tract (Compartment 26).*** 30-acre regeneration harvest, with some retention areas, recently completed. This stop also included a visit to a hiking trail that was adjacent to the harvest block;
4. ***Nazareth Church Tract (Compartment 9).*** 17.8-acre regeneration harvest completed in 2008. Site included Inland Sand Dune natural community where management activities were reviewed and approved by the Wildlife and Heritage Service;
5. ***Nazareth Church Tract (Compartment 5).*** 23.3-acre pine regeneration harvest. Some natural communities designated as HCVF, which requires review and approval of management activities by the Wildlife and Heritage Service.

Tuesday March 24, 2009

1. ***R.F. Richardson (W17).*** 37-acre Chemical Release of natural regeneration; confirmed regeneration monitoring and minimized use of pesticides;
2. ***Steffen Tract (W12).*** First thinning in Loblolly Pine plantation; set up landing only;
3. ***Athol Complex (W-10).*** First thinning in Loblolly Pine plantation; 342 acres of thinning; completed, also small maintained grassy area by Turkey Foundation for wild turkey.
4. ***Hoernicke Oliphant Complex (D 25).***
   A: First thinning partially completed; oak trees were retained and well-released; logger left due to wet conditions; load tickets signed and stamped by Vision Forestry
   B: Second thinning completed
5. ***Indiantown Tract (D-14).*** 117 acres first thinning and 170 acres of final harvest including significant dispersed and clumped retention; this site represents one of the best examples of structural retention in southeastern pine forestry
6. ***Rhodesdale Complex.*** Completed final harvest and active first thinning; logger interview
7. ***Pricilla Pusey Complex (WR19).*** First thinnings on 264 acres;
8. ***Green Polk Complex (S12).*** Clearcut with retention followed by limited herbicide use;
9. ***Peters McAllen Complex (S11).*** 40-acre regeneration harvest; natural regeneration is being monitored to determine if fill-planting is warranted;
10. ***E. Mace Smith Complex (S21).*** First thinning, including Delmarva Fox Squirrel habitats;
11. ***Greenhill Complex (W23).*** Large complex with planned first thinnings, second thinnings, and final harvests.

Wednesday March 25, 2009

1. ***Foster Tract, Chesapeake Forest Project.*** 5,000-acre recent acquisition
2. ***Tankard Farm (WR25).*** First thinning and Final Harvest; small vernal pool buffered from harvest but some machine travel nearby

3. ***Whitesburg (C20).*** Pre-commercial Thinning 18 acres: 65 year old plantation clearcut 1998; natural regeneration, dense stand was thinned by contract crew in 2007; goal of ten foot spacing and 435 tpa almost accomplished; contractor Melvin Beteta.
4. ***Pocomoke State Forest.*** ORV trail; potential impacts to sand dune community.
5. ***Tarr Tract, Stand 24.*** 84-acre natural mixed pine and hardwood stand planned for a regeneration harvest, with provisions to restore structure of a relect sand dune community.

Participants

- Mike Thompson, Lead Auditor, SCS mike@penobscotenvoronmental.com
- Mike Ferrucci, Lead Auditor, NSF mferrucci@iforest.com
- Steve Koehn, State Forester/Director, DNR Forest Service, skoehn@dnr.state.md.us
- Kenneth Jolly, Associate Director, DNR Forest Service, kjolly@dnr.state.md.us
- Jack Perdue, DNR Forest Service, jperdue@dnr.state.md.us
- Kip Powers, DNR Forest Service, kpowers@dnr.state.md.us
- Sam Bennett, Forest Manager, Pocomoke State Forest, sbennett@dnr.state.md.us
- Mike Schofield, CFP Manager, DNR Forest Service, mschofield@dnr.state.md.us
- Don Kronner, CFP Technician, DNR Forest Service, dkronner@dnr.state.md.us
- Kevin Massey, CFP Contractual Employee, DNR Forest Service
- Roy Miller, Pocomoke State Forest Technician
- Mark Beals, Green Ridge State Forest, mbeals@dnr.state.md.us
- Neil Sampson, Vision Forestry, LLC., neil@visionforestry.com
- Larry Walton, Vision Forestry, LLC., safer4u@intercom.net
- Kenny Rees, Vision Forestry, LLC.
- Judy H., Vision Forestry, LLC.
- Bill Cheesman, Vision Forestry
- Donnelle Keech, TNC, dkeech@tnc.org
- Deborah Landan, TNC, dlandau@tnc.org
- Joe Fehrur, TNC
- Robert Feldt, DNR Forest Service, rfeldt@dnr.state.md.us
- Timmy Hopper, T&J Logging
- Wes Knapp, Ecologist, Maryland Natural Heritage Program, wknapp@dnr.state.md.us
- Dr. Joan Maloof, Department of Biological Sciences, Salisbury University, Citizen Advisory Committee, jemaloof@salisbury.edu
- Arthur Egolf, Egolf Forest Harvesting, Inc. , Citizen's Advisory Committee – Logger

3.3.5 Stakeholder Consultation

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

- To solicit input from affected parties as to the strengths and weaknesses of the State of Maryland Department of Natural Resources, Forest Service, relative to the standard, and the nature of the interaction between the Maryland Department of Natural Resources and the surrounding communities; and

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

Principal stakeholder groups of relevance to this evaluation were identified based upon lists of stakeholders from the Maryland Department of Natural Resources and additional stakeholder contacts from other sources (e.g., members of the regional FSC working group).
The following types of groups and individuals were determined to be principal stakeholders:

- Maryland Department of Natural Resources employees and contractors,
- Adjacent property owners;
- Pertinent Tribal members and or representatives;
- Members of the Regional FSC Working Group/National Initiative;
- FSC International;
- Local and regionally-based environmental organizations and conservationists;
- Local and regionally-based social interest organizations;
- Forest industry groups and organizations;
- Purchasers of logs harvested on state forestlands;
- Local, State, and Federal regulatory agency personnel;
- User groups, such as hikers, hunters, horse trail riders, ATV users, and others; and
- Other relevant groups.

Prior to, during, and following the site evaluation, a wide range of stakeholders were consulted in regard to their relationship with the Maryland Department of Natural Resources and their views on the management of the lands enrolled or to be enrolled in the state's certificate. Stakeholders included FSC contact persons, government and non-government organizations involved in forest management, local citizens and groups, employees, contractors, and others. Stakeholders were contacted with notification mailings soliciting comments and inviting participation in the consultation and public comment process. Notifications were distributed primarily via email. Stakeholders with an email address were also invited to provide comments via an online questionnaire and comment form. Phone contacts were also made. At least 100 stakeholders representing diverse environmental, social and economic interests were contacted during the process and invited to provide comments. Comments were received via meetings and personal interviews "face-to-face", phone interviews ("Interview"), and through written responses. Individuals were asked to provide permission to be listed in the report and additional comments may have been received from individuals not wishing to reveal their identities.

Name	Affiliation	Consultation
Garry Adelhardt	Pocomoke River State Park	Interview
Bill Cheesman	Vision Forestry	Interview
Tim Connelly	The Conservation Fund	Interview
Sydney Cropper	Cropper Brothers Lumber Company	Interview

Joe Fehrer	The Nature Conservancy	Written
Jeff Fisher	Glatfelter Paper Co.	Interview
Steven Huettner	Maryland Sportsmen's Association	Written & Interview
Wesley Knapp	Maryland Heritage Program	Interview
Scott Smith	Maryland Heritage Program	Interview
Jeremy Ward	Timberscape Services	Written
Sandy Winter	Recreationalist	Interview

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

The following tables provide a summary of the comments received from stakeholders related to the standards as well as major perspectives and concerns.

Economic Concerns

Comment/Concern	Response
• The department is understaffed and it is increasingly difficult to keep up with the work plan.	Staffing levels and budget constraints were discussed with management staff members, who are well aware of the tension between fiscal realities and workloads. The team concluded that the Forest Service is making prudent efforts to balance work needs with available staff and resources given the current economic climate.
• More financial resources are need to support pre-commercial treatments, prescribed burning (e.g., for RTE habitats), and recreation trail management.	See comment above.
• State isn't selling enough southern yellow pine.	As noted in the CF management plan, the Forest Service has had to deal with an unbalanced age class distribution, which may result in a temporary sag in available forest products.

	Management efforts, however, will eventually result in a more even flow of products. Production in the last 5 years has also been hampered by wet weather and poor ground conditions.
• Southern yellow pine is being managed on too long of a rotation; should be 45-50 years.	Some pine management areas are being managed on longer rotations to benefit ecological resources, including the endangered Delmarva fox squirrel. Other areas, however, are managed according to more commercially-driven rotation lengths. The team concluded that the Forest Service is striking an appropriate balance between economic and ecological needs.
• The state should sell more timber to help local businesses and provide revenue to the state.	See comment above.
• State has done a good job keeping the industry in mind during the current economy challenges.	Comment noted.
• Certification has been a smart move and is appropriate and welcomed for more state lands.	Comment noted.
• Mills need consistent timber supplies to operate and the information now available from the state about planned harvest levels helps address uncertainty.	Comment noted. See also observations above about the future more even flow of products once age class distribution issues are addressed.
• State could do more to utilize under-utilized species and allow more non-timber forest product utilization.	The team discussed this issue with Forest Service staff during the evaluation. As a result, Vision Forestry summarized their efforts to date in this area and the Forest Service will renew conversations with companies that use under-utilized species. Opportunities to harvest non-timber forest products have been minimal on the subject properties to date.

• The state and local businesses could be doing more to market certified products and make sure the local FSC products are getting used rather than materials being shipped in from other areas where more companies are labeling and marketing them.	See comment above regarding Vision Forestry's prior efforts and the State's commitment to promote the local use of FSC-certified raw materials.
• Recreational opportunities and service providers (guides, etc.) could be listed at the State website.	This comment has been passed on to the Forest Service for their consideration. Many recreational opportunities, however, are posted on the website.

Social Concerns

Comment/Concern	Response
• Need more unified management for recreation opportunities (equestrian trails, trailer parking, etc).	Each forest has a unique set of recreational resource opportunities and constraints that must be addressed at the forest level. That said, the Forest Service also has a management system designed to ensure consistency in management approaches between forests. Nonetheless, the comment has been forwarded to the Forest Service for their consideration.
• Need more remote campsites.	Comment has been passed on to the Forest Service for their consideration.
• Need forestry messaging and public education about the benefits of management.	The Forest Service website contains information regarding the benefits of forest management and Forest Service staff members participate in public outreach efforts.
• The state needs to provide more opportunities for public input to management planning and operations.	The Forest Service maintains a Citizen's Advisory Committee and Annual Work Plans are made available for public comment on the Forest Service's website. That said, the team did discuss with the Forest Service additional proactive efforts that

	might be appropriate to ensure that the public is aware of these opportunities.
• We are lucky to have these state lands; they are beautiful places.	Comment noted.
• A consensus has been established amongst stakeholders about the HCVF definition.	Comment noted.
• It is awesome that the state lands are FSC certified and I want to see this continue.	Comment noted.
• Need more active advisory committee members, better meeting attendance, and stronger tribal representation.	Advisory Committee composition and attendance were discussed with the Forest Service. At this time, it appears that the Forest Service allows members to miss a few meetings before being asked to leave the Committee. The Forest Service strives for broad representation in Committee membership.
• Should have an annual public meeting to share and get input on the work plan and could include a tour so people understand where activities are planned.	This comment was passed on to the Forest Service, where staff members noted that such public meetings and tours are often poorly attended. The Service, however, will consider the pros and cons of future public meetings and tours.
• Public comment period should be advertised on the radio and in newspapers, not just online and the timing of it shouldn't jump around so much from year to year.	This comment was passed on to the Forest Service for their consideration.
• Public engagement and promotion of recreational opportunities is too focused on hunting. Other user groups and interests should be better engaged with maps developed for them and better signage in the forests.	The team noted efforts that the Forest Service has made to promote recreational pursuits such as bird-watching, horse riding, canoeing, and hiking. There is a strong tradition of hunting on the Eastern Shore, but it does not appear that the Forest Service is paying too little attention to other recreational pursuits.
• Public and private partnerships are needed to support forest conservation.	The Chesapeake Forest Project is seen as a positive public/private partnership by most parties.

• State is understaffed and there aren't enough foresters to meet public needs.	See comment above regarding staffing and financial constraints.

Environmental Concerns

Comment/Concern	Response
• Pocomoke State Forest includes sensitive riparian areas and ORV use should be reviewed and some types of vehicles may not be appropriate for use in the forest.	ORV use on the Pocomoke is mandated by State legislation. The team did, however, tour the ORV trail and noted that some trail use occurs on ecologically sensitive sand dune communities. The need for additional monitoring and enforcement of existing regulations was also discussed.
• Selling more timber would help forest health.	This is one point of view regarding forest health, whereas other stakeholders would like to see less harvesting as a means of promoting their view of forest health. The team concludes that the Forest Service is striking an appropriate balance between economic and ecological needs.
• More should be done to address invasive species.	The Forest Service aggressively monitors invasive species and takes immediate steps to eradicate such populations, where practicable, primarily through herbicide application. The Forest Service periodically considers what other measures might be appropriate to address invasive species.
• More should be done to prevent unauthorized uses (e.g., gates, enforcement) and more enforcement capacity is needed to prevent destructive OHV use, poaching, dumping and other activities.	See comment and response above regarding ORV use. The team noted that the Forest Service recently added new gates and upgraded existing ones. Forest Service staff members and contractors monitor illegal dumping and turn the matter over to appropriate enforcement

	personnel when it is encountered. Enforcement of regulations related to illegal hunting is also turned over to the appropriate agency.
• It will take time to complete a rigorous environmental (e.g., HCVF) review of the new tracts being enrolled in the certificate and this analysis should not be rushed just to meet certification timelines.	This comment was passed on to the Forest Service for their consideration. The team also visited new tracts and determined that the Forest Service is making sure that there is adequate review of potential HCVF prior to any management activities.
• HCVF definition should be consistently applied and properties first certified should be reviewed and the HCVF analysis updated.	This comment was discussed with the Forest Service and efforts are being made to ensure the consistent application of HCVF designations.
• The HCVF approach being used on Chesapeake should be the same as at Pocomoke and Foster.	See comment above. Although the forests have unique attributes, a consistent approach to HCVF is warranted.
• Finalizing the fox squirrel management plan will help address the current uncertainty about impacts on harvests and rotation length.	Comment noted.
• Certification may not fit for the more pristine state forests where a low level of active management is appropriate and the management from the Chesapeake would be inappropriate.	FSC certification does not prescribe levels of management activity and many types of forests can be certified.
• Global warming and sea level changes are a concern for salt kill and coastal areas.	Comment noted.
• The Pocomoke work plan calls for too much harvesting in older hardwood stands. The low hardwood retention levels and the plans to replant with pine will cause a loss in hardwood and ecological diversity.	This comment was discussed with the Forest Service at several of the site visits on the Pocomoke Forest.
• There should be no herbicide use on state forest lands.	Comment noted. FSC certification, however, does not preclude the responsible use of herbicides.
• State could be involved in more research, including soil compaction studies.	This comment was passed on to the Forest Service for their consideration. The team notes

	that the Forest Service does promote research in many areas.
• It is an improvement to not have the private hunting clubs because they did whatever they wanted with ATVs, campfires, littering, etc.	Comment noted.
• Maps included with the management documents and work plan have improved and are helpful with the review process.	Comment noted.
• Expanding state ownership keeps land out of development and is a good thing.	Comment noted.
• The recent drought and dry years are effecting the environment.	Comment noted.
• State does a good job with wildlife management and serving hunting interests.	Comment noted.

3.4 Total Time Spent on audit

A total of approximately 12 person-days were spent on document review, stakeholder consultation, site visits, analysis of observations, and report preparation.

3.5 Process of Determining Conformance

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

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

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

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

operations response to the CAR within the stipulated time frame.

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

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

4.0 Results of the Evaluation

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

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

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/REC #s
P1: FSC Commitment and Legal Compliance	▪ The Forest Service has expressed a long-term commitment to meeting the FSC standards ▪ State staff members have extensive experience in interpreting and complying with complex regulations and legislation ▪ The Forest Service has installed new gates in many areas to control access ▪ The Forest Service and Vision Forestry monitor properties for illegal activities	▪ The Forest Service had not received the necessary approvals from SCS for all use of the FSC logo on such things as reports, websites, and PowerPoint presentations ▪ The Forest Service intends to eventually certify all State Forests and has developed procedures for ensuring that HCVFs are not diminished by management activities on uncertified forests; implementation of these procedures must be demonstrated	▪ **CAR 2009.1** ▪ **CAR 2009.2**
P2: Tenure & Use Rights & Responsibilities	▪ The Forest Service owns the subject lands and there are no known claims against this ownership ▪ On the Chesapeake Forest, the Forest Service balanced the traditional use of the land by private hunt clubs with the benefit of making a proportion of such leases available to the public	▪ None observed	
P3: Indigenous Peoples' Rights	▪ The subject lands are not owned by a Native American Tribe or Tribal Enterprise ▪ The Forest Service has successfully implemented procedures for consulting with Native American representatives regarding culturally important resources	▪ Procedures for consulting with Native American representatives employed on the Chesapeake Forest should be more formally adopted on the Pocomoke State Forest	▪ **REC 2009.1**

P4: Community Relations & Workers' Rights	▪ The Forest Service consults with experts regarding sites of special cultural significance (e.g., pre-historic and historic features) ▪ State employees benefit from job stability and benefits packages associated with State employment ▪ The Forest Service notifies neighbors and communities prior to implementing controlled burns ▪ The Forest Service and Vision Forestry strive to maintain relationships with a wide range of community and forest products stakeholders ▪ Logging contractors express satisfaction with their working relationships with the Forest Service and Vision Forestry ▪ The Forest Service promotes training for its employees ▪ The Forest Service has provided off-season work opportunities for commercial fishermen as part of a State Program to support commercial fisheries ▪ The Forest Service maintains a Citizen's Advisory Committee to ensure input from a variety of interest groups ▪ The Forest Service solicits input from the public on annual work plans	▪ In striving to maintain an arms-length distance from independent logging contractors, the Forest Service is potentially overlooking opportunities to implement additional proactive measures to enhance safety ▪ The Forest Service could better document efforts to identify sites of special cultural significance on the Pocomoke State Forest ▪ The Forest Service does not notify all nearby landowners when implementing harvest operations or when aerially applying herbicides	▪ **REC 2009.2** ▪ **REC 2009.3** ▪ **REC 2009.4**

P5: Benefits from the Forest	▪ The Forest Service strives to maintain forestlands as productive forests and to provide raw materials to the forest products industry, while balancing other ecological and community needs ▪ The Forest Service has recent CFI data for all subject properties ▪ A spatially explicit wood supply analysis is being developed for the Chesapeake Forest ▪ The Forest Service strives to provide an acceptable flow of raw materials to local forest products businesses ▪ Vision Forestry has made efforts on behalf of the Forest Service to communicate with small, local value-added businesses ▪ Harvest operations are generally efficient and there is minimal waste of merchantable logs	▪ The Forest Service has general AAC calculations for the Chesapeake Forest but has not developed similar estimates for the Pocomoke State Forest ▪ The Forest Service should continue to meet with stakeholders from the forest products industry to explain constraints on harvest levels and long-term plans for a more even flow of logs	▪ **REC 2009.5**

P6: Environmental Impact	▪ The Wildlife and Heritage Services program conducts inventories for rare, threatened, and endangered species and natural communities ▪ All proposed harvests are reviewed by an interdisciplinary team of professionals ▪ The Forest Service and Wildlife and Heritage Services program have developed a system of conservation zones (e.g., FIDS, DFS habitat, ESAs) that conserve ecologically sensitive resources ▪ The Forest Service strives to manage pine plantations as natural forests ▪ The Forest Service strives to minimize the use of chemical pesticides and herbicides ▪ Retention areas are more commonly prescribed in regeneration harvest blocks ▪ Harvest operations are shut down when weather conditions are poor and likely to result in excessive soil compaction or rutting ▪ Supplemental planting is only used when natural regeneration does not result in adequate stocking levels ▪ Harvest operations are designed to conserve water quality through the use of BMPs ▪ Representative samples of existing ecosystems have been identified and are protected ▪ The Forest Service has a comprehensive program for controlling invasive species	▪ The Forest Service and Wildlife and Heritage Service must develop more specific protocols for conserving vernal pool habitats ▪ Existing ORV trails on the Pocomoke State Forest should be screened for the potential presence of rare, threatened, or endangered species ▪ The Forest Service should review their definition of old growth to ensure that it conforms to the definition found in the FSC's Southeast Regional Standards ▪ The Forest Service should consult with the Wildlife and Heritage Service to determine if it is appropriate to develop age class ranges for late-successional and old growth conditions for individual tree species and forested community types	▪ **CAR 2009.3** ▪ **CAR 2009.9** ▪ **REC 2009.7** ▪ **REC 2009.8**

P7: Management Plan	▪ The entire management plan is made available to the public on the Forest Service web site ▪ Current management plans are comprehensive ▪ Comprehensive Annual Work Plans are developed and made available for comment to the public ▪ Vision Forestry is working on a spatially explicit wood supply model for the Chesapeake Forest, with a particular emphasis on pine ▪ The management plan is based on comprehensive ecological data provided by the Wildlife and Heritage Services ▪ The GIS for the Chesapeake Forest continues to grow in content and capability	▪ The management plan for the Pocomoke State Forest will soon be out of date ▪ The Forest Service shall provide clearer evidence for how implementation of the Pocomoke State Forest management plan has been monitored ▪ A specific estimate of the AAC for loblolly pine for the Pocomoke State Forest should be developed ▪ A public summary of the management plan was lacking (Major CAR that has been closed) ▪ Management plans could include better descriptions of the silvicultural systems that are used to manage stands that aren't dominated by loblolly pine ▪ The description and justification for harvesting techniques and equipment to be used could be better documented in the harvest prescription ▪ The Forest Service could define training needs for each major staff category (e.g., technician, forester, manager)	▪ **MAJOR CAR 2009.1 (CLOSED)** ▪ **CAR 2009.4** ▪ **REC 2009.9** ▪ **REC 2009.10** ▪ **REC 2009.11**

P8: Monitoring & Assessment	▪ The Forest Service monitors the forest at the landscape, stand, and specific project levels ▪ CFI plots are used to monitor forest composition and growth ▪ Detailed records of the yield of forest products from specific harvest blocks are maintained ▪ The Forest Service tracks the specific costs of harvest operations ▪ The Wildlife and Heritage Service monitors a wide range of ecological parameters ▪ Harvest inspections are conducted during operations to monitor the environmental impacts of logging operations ▪ The Forest Service maintains a record-keeping system that allows monitoring the chain-of-custody ▪ The results of monitoring efforts were used to update the Chesapeake Forest management plan and will be used to update the Pocomoke State Forest management plan	▪ A public summary of the of monitoring indicators was lacking (Major CAR that has been closed) ▪ Evidence for how implementation of the Pocomoke State Forest management plan was monitored should be provided ▪ Evidence that a current forest inventory is available for the Pocomoke State Forest should be provided (a CAR was issued and then closed upon submission of information following the audit) ▪ The updated management plan for the Pocomoke State Forest should include specific measures for monitoring implementation of the plan ▪ More explicit protocols for monitoring regeneration in mixed stands (i.e., stands not dominated by loblolly pine) should be developed	▪ **MAJOR CAR 2009.2 (CLOSED)** ▪ **CAR 2009.5** ▪ **CAR 2009.6 (CLOSED)** ▪ **REC 2009.12** ▪ **REC 2009.13**

P9: Maintenance of High Conservation Value Forest	▪ The Forest Service has worked closely with the Wildlife and Heritage Service and other stakeholders to define HCVF ▪ There is a large amount of information concerning unique ecological features available to inform consideration of HCVF on the certified forests ▪ Management efforts in HCVF are reviewed and supervised by the Wildlife and Heritage Service ▪ The Wildlife and Heritage Service is responsible for monitoring the effects of management in HCVFs ▪ The Chesapeake Forest management plan contains a detailed section on HCVF and the updated Pocomoke State Forest plan will contain similar information	▪ The Forest Service has developed protocols for ensuring that HCVF on uncertified State Forests will not be diminished by management efforts, but how these protocols have been implemented must be better documented ▪ Efforts to define HCVF on the Pocomoke State Forest were recently initiated and the Forest Service must strive to ensure that sufficient time is allotted to follow-up stakeholder consultation ▪ The Forest Service has specific and detailed protocols for conserving and enhancing Delmarva Fox Squirrel habitat; whether to define such habitats as HCVF, however, must be reconsidered ▪ A more detailed description of management activities in HCVF should be made available to the public ▪ Management plans should include more specific descriptions for how HCVFs are being conserved through protection and/or management efforts	▪ **CAR 2009.2** ▪ **CAR 2009.7** ▪ **CAR 2009.8** ▪ **REC 2009.14**

P10: Plantations	▪ Areas classified as "plantation" were established prior to certification when abandoned agricultural areas were reclaimed for forest uses ▪ Plantations are now managed as natural forests ▪ Plantations are dominated by loblolly pine, which is an important raw material for area forest products industries ▪ Management plans contain specific information regarding plantation management	▪ Management plans could contain more specific programs related to the restoration of natural forests on plantation sites	

4.2 Preconditions

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

The following pre-conditions were placed on the Maryland Forest Service during this recertification assessment. They have all been closed to the satisfaction of the audit team

Background/Justification: FSC Criterion 7.4 requires that forest managers make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1. The Forest Service provides the full text of the Pocomoke State Forest management plan on its website, but the plan – which is long and complex – does not include a summary.	
MAJOR CAR 2009.1	Prior to the award of certification the Forest Service must prepare a summary of the management plan for the Pocomoke State Forest and make said summary available to the public through the Division's website or in a printed format upon request.
Reference	FSC Criterion 7.4
State of Maryland Response: Immediately following the audit the Division of Forestry prepared a public summary of the management plan that will be made available on the Division's website. Printed copies will also be made available to members of the public upon request.	
Disposition of CAR: **CAR CLOSED.**	

Background/Justification: FSC Criterion 8.5 requires that forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2. The Forest Service provides information regarding monitoring on its website, but does not include a summary of monitoring efforts for the Pocomoke State Forest.	
MAJOR CAR 2009.2	Prior to the award of certification the Forest Service must prepare a summary of monitoring results for the Pocomoke State Forest and make said summary available to the public through the Department's website or in a printed format upon request.
Reference	FSC Criterion 8.5
State of Maryland Response: Immediately following the audit the Forest Service prepared a public summary of monitoring efforts that will be made available on the Department's website. Printed copies will also be made available to members of the public upon request.	
Disposition of CAR: **CAR CLOSED.**	

5.0 Certification Decision

5.1 Certification Recommendation

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team hereby recommends that the Maryland Forest Service be awarded FSC certification as a "Well-Managed Forest" subject to the corrective action requests stated in Section 5.2. The Maryland Forest Service has demonstrated that their system of management is capable of ensuring that all of the requirements of the Southeast Regional Standard are met over the forest area covered by the scope of the evaluation. The Maryland Forest Service has also demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.

5.2 Initial Corrective Action Requests

The following Minor Corrective Action Requests (CARs) were imposed as a result of the evaluation:

Background/Justification: Certified parties must receive approval from SCS, as an FSC-accredited certification body, for all uses of FSC logos, names, and trademarks. During the audit evidence was lacking to prove that such approvals had been received for the use of FSC logos, names, and trademarks on such documents as management plans, websites, brochures, and PowerPoint presentations. Following the audit the Forest Service sought and received approval from SCS for current logo use. A Minor CAR, however, is justified to ensure compliance with the requirements for logo use approval over the next year.	
MINOR CAR 2009.1	The Forest Service must develop a written procedure for ensuring that SCS approval is received for all use of FSC logos, names, and trademarks, where appropriate. The procedure must ensure that FSC design and use standards are adhered to and that appropriate staff are trained in implementation of the procedures. The Forest Service must also maintain records of the use of FSC logos, names, and trademarks and provide evidence that SCS approved such uses prior to their being employed.
Deadline	A response is due by the 2010 annual audit.
Reference	FSC-TMK-50-201 Requirements for Promotional Use of FSC Trademark

Background/Justification: FSC Indicator 1.6.b requires that forest owners or managers document the reasons for seeking partial certification. This is part of the requirement to demonstrate a long-term commitment to adhere to the FSC Principles and Criteria. Although the FSC does not mandate timetables for certifying all properties under a common management system, it does require the conservation of High Conservation Value Forests (HCVF) on uncertified management units. A CAR (CAR 2007.1, Part B) was previously issued that required that the Forest Service develop a process for identifying HCVF on uncertified State Forests. Such a process was developed and the CAR was closed. The Forest Service, however, must provide evidence that these procedures are being employed on uncertified State Forests, thereby ensuring the conservation of HCVF attributes.

MINOR CAR 2009.2	The Forest Service must document that HCVFs have been identified and mapped on all uncertified State Forests and demonstrate that management activities in such areas, if any, are not resulting in the diminishment of HCVF attributes.
Deadline	A response is due by the 2010 annual audit.
Reference	FSC Indicators 1.6.b, 9.1.a, 9.3.c

Background/Justification: FSC Indicator 6.5.c requires that logging operations avoid damage to residual trees, regeneration, ground cover, soils, waterways, and wetlands. In addition, FSC Indicator 6.5.h requires that special management zones be established for vernal pools. During the site visit a potential vernal pool was observed in a recently logged area; the pool had been generally protected from logging operations, but forest managers indicated that they were not aware of any definitive internal guidelines for the conservation of vernal pools. Natural Heritage Program staff indicated that such guidelines were being developed.	
MINOR CAR 2009.3	The Forest Service must develop a scientifically credible definition of significant vernal pools for the Eastern Shore and develop protocols for identifying such areas within harvest blocks. The Forest Service must also: 1) prepare management guidelines for conserving significant vernal pools; 2) provide evidence that forest managers have been trained to apply such guidelines, and 3) provide evidence that the guidelines are being implemented during harvest planning and operations.
Deadline	A response is due by the 2010 annual audit.
Reference	FSC Indicators 6.5.c and 6.5.h

Background/Justification: FSC Indicator 7.2.a requires that the management plan be current and reviewed and revised as necessary (at least every five years). A 10-year management plan was prepared for the Pocomoke State Forest in 1996, to take effect in 1997. The plan, however, was not formally adopted until 2000, meaning that the 10-year window will expire in 2010. Although not officially out-of-date, the Pocomoke State Forest management plan is dated and should be updated to reflect all the elements identified in FSC Criterion 7.1.	
MINOR CAR 2009.4	The Forest Service must provide evidence that the Pocomoke State Forest management plan has been periodically (at least every 5 years) reviewed and revised as necessary. The Forest Service must also provide a timeline for the completion of a new sustainable management plan and explain how management will transition from using the current plan to implementing a new plan.
Deadline	A response is due by the 2010 annual audit.
Reference	FSC Indicator 7.2.a

Background/Justification: FSC Indicator 8.1.a requires that the implementation and effectiveness of the management plan are periodically monitored to assess the degree to which the vision, goals, and objectives of the plan have been achieved; deviations from the management plan have been documented; unexpected effects of management activities have been identified;

and social and environmental effects of management activities have been evaluated. As previously noted (see Minor CAR 2009.4), the Pocomoke State Forest management plan is becoming out-of-date and is slated for updating. It was not clear at the time of the audit the degree to which the implementation and effectiveness of the management plan had been monitored.	
MINOR CAR 2009.5	The Forest Service must provide evidence for how the implementation and effectiveness of the Pocomoke State Forest management plan have been monitored since 2000 and describe how the results of such monitoring efforts have influenced or modified management programs.
Deadline	A response is due by the 2010 annual audit.
Reference	FSC Indicator 8.1.a

Background/Justification: FSC Indicator 8.2.a.1 requires that forest managers maintain records of standing timber and timber harvest volumes by species, volume, and product class (e.g., saw timber and pulp). At the time of the audit, the status of the CFI and the harvest record-keeping system for the Pocomoke State Forest was not clear (i.e., would they be as comprehensive as the Chesapeake Forest).	
MINOR CAR 2009.6	The Forest Service must provide evidence demonstrating that a current inventory of standing timber is available for the Pocomoke State Forest. The Forest Service must also demonstrate how the harvest volumes by species, volume, and product class are monitored for the Pocomoke State Forest.
Deadline	A response is due by the 2010 annual audit.
Reference	FSC Indicator 8.2.a.1
State of Maryland Response: Following the audit, the Forest Service demonstrated that 2002 CFI data are available for the Pocomoke State Forest. The Forest Service also documented that detailed records of harvest volumes by species, volume, and product class are available for the Pocomoke State Forest.	
Disposition of this CAR: CAR CLOSED.	

Background/Justification: The FSC's regional standards define High Conservation Value Forests (HCVFs) as those that possess, among other attributes, forest areas containing globally, regionally, or nationally significant concentrations of biodiversity values (e.g., endangered species). The Delmarva Fox Squirrel (DFS) is an endangered species, according to the Federal Endangered Species Act, and habitat for this species is found on Maryland's Eastern Shore. The Forest Service has comprehensive management programs for conserving and enhancing DFS habitat on the Chesapeake and Pocomoke Forests, but such forests have not been identified as HCVF.	
MINOR CAR 2009.7	The Forest Service must either include DFS habitat in its definition of HCVF for the Chesapeake and Pocomoke Forests or provide a rigorous defense for why such forests do not meet the FSC's definition of HCVF.
Deadline	A response is due by the 2010 annual audit.
Reference	FSC Indicator 9.1.a

Background/Justification: FSC Indicator 9.3.b requires that management of HCVFs maintains or enhances their defining characteristics, and their extent, and is implemented according to the management plan. A summary of management activities planned for these forests must also be included in the publicly available summary of the management plan (see FSC Indicator 7.4.1). The Forest Service undertakes a variety of management activities in HCVF that are designed to maintain or enhance conservation attributes. The Forest Service also documents management activities in HCVF within publicly available annual work plans. The Forest Service does not, however, provide a summary of these management activities in its publicly available summary of the management plan.	
MINOR CAR 2009.8	The Forest Service must provide a summary of management activities in HCVFs in the publicly available summary of the management plan for both the Chesapeake Forest and the Pocomoke State Forest.
Deadline	A response is due by the 2010 annual audit.
Reference	FSC Indicator 9.3.b

Background/Justification: When existing information suggests that rare, threatened, or endangered species may be present, a survey is conducted to determine if they are present or management plans are developed based on their assumed presence. It appears that rare species may be associated with sand dune communities associated with the ORV trails on the Pocomoke State Forest, but surveys have not been conducted to determine if they are actually present. In addition, evidence of riders going off the designated trail onto sand dune communities was observed.	
Minor CAR 2009.9	We recommend that the Wildlife and Heritage Service screen existing ORV trails on the Pocomoke State Forest for the presence of rare, threatened, or endangered plants or animals that could potentially be impacted by trail use.
Reference	FSC Indicator 6.2.a

The following recommendations were made as a result of the evaluation:

Background/Justification: FSC Indicator 3.3.a requires that forest managers consult with Native American representatives regarding the location of sites of cultural importance on the certified forest. Such consultation has been explicitly conducted on the Chesapeake Forest and managers suggested that similar consultation had occurred on the Pocomoke State Forest. Formally adopting the procedures used on the Chesapeake Forest on the Pocomoke State Forest, however, would ensure conformance to Indicator 3.3.a.	
REC 2009.1	The procedures used to consult with Native American representatives on the Chesapeake Forest should be more formally adopted on the Pocomoke State Forest.
Reference	FSC Indicator 3.3.a

Background/Justification: FSC Indicator 4.2.a requires that forest managers develop and implement comprehensive safety programs. Contractors have specific safety programs, but forest managers appear to take differing approaches to ensuring their implementation on harvest

operations.	
REC 2009.2	We recommend that the Forest Service consider the need for additional training in monitoring safety practices of contractors while maintaining appropriate arm's-length relationships with independent contractors (i.e., how to observe and document potential safety concerns without directing the contractor's employees).
Reference	FSC Indicator 4.2.a

Background/Justification: FSC Indicator 4.4.b requires that outside experts be consulted to identify sites of special cultural significance. Such consultation has happened on the Chesapeake Forest, but whether such consultation has occurred in sufficient detail on the Pocomoke State Forest is not as transparent as it could be.	
REC 2009.3	We recommend that the Forest Service better document efforts taken to consult with experts regarding the potential location of sites and features of special cultural significance (e.g., pre-historic and historic features) on the Pocomoke State Forest.
Reference	FSC Indicator 4.4.b

Background/Justification: FSC Indicator 4.4.c requires that adjacent landowners and/or nearby communities be informed of forest management activities with potential off-site impacts. The Forest Service has a detailed protocol for notifying stakeholders when prescribed burning will take place, but similar procedures are not used for harvest operations or the aerial application of herbicides.	
REC 2009.4	We recommend that the Forest Service consider the benefits of notifying adjacent landowners of scheduled harvest operations and aerial applications of herbicides.
Reference	FSC Indicator 4.4.c

Background/Justification: FSC Indicator 5.6.a requires that harvest rates be sustainable, based on available data and harvest records. CFI data are available for the Pocomoke State Forest and managers strive to ensure that annual harvests do not exceed estimated annual growth rates. Loblolly pine is the primary commercial species and annual harvest rates (all species) on the Pocomoke State Forest approach the estimate of annual growth for loblolly pine. More specific estimates of the AAC for loblolly pine and other commercially important species, therefore, may be warranted.	
REC 2009.5	We recommend that CFI data and other information be used to develop specific AAC estimates for each major commercial species on the Pocomoke State Forest.
Reference	FSC Indicator 5.6.a

Background/Justification: FSC Indicator 6.3.a.2 requires that forest managers restore a portion of the forest to the natural distribution of age classes of trees. The Forest Service has a definition

of old growth that guides management decisions, but this definition should be compared with the FSC's regional definition to ensure consistency.	
REC 2009.7	We recommend that the Forest Service compare their definition of old growth to the current definition found in the FSC's Southeast Regional Standards to ensure that they are similar.
Reference	FSC Indicator 6.3.a.2

Background/Justification: FSC Indicator 6.3.a.2 requires that forest managers restore a portion of the forest to the natural distribution of age classes of trees. The Forest Service has a definition of old growth that guides management decisions, but it appears that more specific definitions of what constitutes late-successional or old growth stages for dominant species and natural communities would enhance management efforts.	
REC 2009.8	We recommend that the Forest Service consult with the Wildlife and Heritage Services to determine if it is appropriate to develop specific age class ranges for late-successional and old growth conditions for individual tree species and forested natural community types.
Reference	FSC Indicator 6.3.a.2

Background/Justification: FSC Indicators 7.1.a.1 and 7.1.c.1 require that forest managers document silvicultural strategies that will be employed to meet specified goals and objectives. Management plans contain detailed information regarding managing loblolly pine, the primary commercial species, but contain only general information regarding the silvicultural systems that will be used to manage other species.	
REC 2009.9	When updating management plans, more attention should be given to describing the silvicultural systems used to manage stands that aren't dominated by loblolly pine.
Reference	FSC Indicator 7.1.a.1 and 7.1.c.1

Background/Justification: FSC Indicator 7.1.i requires a description and justification of harvesting techniques and equipment to be used. Forest managers discuss techniques and equipment with harvesting contractors, but the decisions made as a result of these meetings are not well documented.	
REC 2009.10	We recommend that the description and justification of harvesting techniques and equipment to be used be documented in the harvest prescription.
Reference	FSC Indicator 7.1.i

Background/Justification: FSC Indicator 7.3 requires that forest workers be adequately trained for their assigned duties to ensure the proper implementation of the management plan. The Forest Service encourages training and approves many training requests. The Forest Service, however, has not developed a list of required skills and related training needs for each major staff category that could be used to assess training needs for individual staff members.	
REC 2009.11	We recommend that the Forest Service define the training needs for each

	major staff category (e.g., technician, forester, manager) and develop more explicit training programs where appropriate; we further recommend annual reporting on training that has taken place each year.
Reference	FSC Indicator 7.3

Background/Justification: FSC Indicator 8.1.a requires periodic monitoring of the implementation of the management plan. The management plan for the Pocomoke State Forest has been in place for nearly a decade and it is not clear the degree to which implementation of the plan has been monitored. The management plan is scheduled for updating in the near future, which provides an opportunity for developing more specific protocols for monitoring implementation of the new plan.	
REC 2009.12	We recommend that the updated Pocomoke State Forest management plan include specific protocols for monitoring implementation of the plan.
Reference	FSC Indicator 8.1.a

Background/Justification: FSC Indicator 8.1.b requires that specific protocols be developed when monitoring requires sampling efforts. Regeneration is monitored, both formally and informally, to determine if fill planting is warranted. Protocols for monitoring loblolly regeneration are somewhat quantitative, but monitoring mixed stands is still done on a qualitative basis and there are no protocols in place to guide decisions related to fill planting.	
REC 2009.13	We recommend the development of more explicit protocols for monitoring regeneration in mixed stands (i.e., stands not dominated by loblolly pine). Such protocols should contain guidelines related to when fill planting is warranted; these protocols should also provide guidance related to species composition to be used for fill planting in mixed stands.
Reference	FSC Indicator 8.1.b

Background/Justification: FSC Indicator 9.3.b requires that management of HCVF maintains or enhances their value according to the management plan. Management plans and Annual Work Plans contain information related to activities in HCVF, but such documents could be improved through more specific descriptions of how HCVFs are being conserved through protection and/or management efforts.	
REC 2009.14	We recommend more explicit descriptions in the management plan of how HCVFs are being conserved through protection and/or management efforts.
Reference	FSC Indicator 9.3.b

6.0 Surveillance Evaluations

If certification is awarded, surveillance evaluations will take place at least annually to monitor the status of any open corrective action requests and review the continued conformance of the Maryland Forest Service to the Southeast Regional Standard. Public summaries of surveillance evaluations will be posted separately on the SCS website (www.scscertified.com).

7.0 Summary of SCS Complaint and appeal Investigation Procedures

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

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

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

The written Complaint or Appeal must:

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

Written complaints and appeals should be submitted to:

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

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