

# Maryland DNR Forest Service

Tawes Building, 580 Taylor Avenue  
Annapolis, Maryland 21401

SFI 2015-2019 Standards and Rules®  
Section 2 – Forest Management

2nd Surveillance Audit





# NSF Forestry Program Audit Report

## A. Certificate Holder Information

Certificate Holder	Maryland DNR Forest Service
Customer Number	OY301
Contact Information (Name, title, phone & email)	Jack Perdue, Forest Resource Planning 410-260-8505 (office), <a href="mailto:jack.perdue@maryland.gov">jack.perdue@maryland.gov</a>
Scope of Certification	The forest management program of the Maryland Department of Natural Resources on the following Maryland State Forests: Chesapeake Forest Lands, Pocomoke State Forest, Green Ridge State Forest, Garrett State Forest, Potomac State Forest and the Savage River State Forest. SFI Forest Management code: NSF-SFI-FM-OY301.
Scope is accurate and appropriate, and matches on certificate, FRS and audit plan.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Locations Included in the Certification Note: may be listed as plain text or included in an appendix or a separate file.	Chesapeake Forest Lands Pocomoke State Forest Green Ridge State Forest Garrett State Forest Potomac State Forest Savage River State Forest
Significant Changes to Operations or to the Standard(s)	No significant changes

## B. Audit Team

Lead Auditor	Michelle Matteo, Sr. NSF Lead Auditor
Audit Team Member(s)	Beth Jacqumain

## C. Site Visits

Date and Location of Each Visit	20-22 July 2021
---------------------------------	-----------------

## D. Audit Results

Auditor Recommendation	<input type="checkbox"/> Grant, maintain or renew certification <input checked="" type="checkbox"/> Grant, maintain or renew certification pending closure of CARs <input type="checkbox"/> Grant, maintain or renew certification pending follow-up assessment <input type="checkbox"/> Do not grant, maintain or renew certification (notify NSF office immediately)
Number and Summary of Findings of "Exceeds the Requirements"	- 1 - <b>SFI 11.1.2:</b> Assignment and understanding of roles and responsibilities for achieving <i>SFI 2015-2019 Forest Management Standard objectives</i> . Excellent communication exists between the MD-DNR Forest Service staff and loggers. On the ground practices looked good and were consistently above average, in part resulting from the clear communications.
Number and Summary of Findings of "Opportunity for Improvement"	- 1 - <b>SFI FM Std, Section 13.1.2: OFI</b> –There is an opportunity to improve the contact with local stakeholders, to clarify how the Compartment and Stand Silvicultural proposals noted in the Annual Work Plan (AWP) link to the corresponding Timber Sale Contract #s (TS#) that are enacted.



<p>Number and Summary of Findings of "Minor Nonconformity"</p>	<p>- 2 -</p> <p><b>SFI FM Std, Section 1.1.1: MINOR CAR</b> – For the Pokomoke-Garrett SF (PGSF) and Savage River SF (SRSF) Forest Management Plans (FMP), the sections that describe forest modeling are not consistent with descriptions by field staff on how those are being implemented in operational planning. See SRSF – Section 5.12 - Forest Modeling, pg. 70, and PGSF – Section 5.12 - Forest Modeling, pg. 70.</p> <p><b>SFI FM Std, Section 11.1.3: MINOR CAR</b> – Staff education and training sufficient to their roles and responsibilities. Staff have continued to use outdated templates for the harvest contracts and addendums.</p>
<p>Number and Summary of Findings of "Major Nonconformity"</p>	<p>- 1-</p> <p><b>SFI Multi-site Standard, Sec. 4.1.1: MAJOR CAR, repeated issue</b> - Templates used for Harvests are maintained by the Central Office – multiple templates available for download contained errors or omissions.</p>
<p>Summary of review of nonconformities from previous audit(s)</p>	<p><b>Minor CAR 2020.1:</b> SFI 14.1.1: The summary audit report submitted by the Program Participant (one copy must be in English), shall include, at a minimum,</p> <ul style="list-style-type: none"> <li>a. a description of the audit process, objectives and scope;</li> <li>b. a description of substitute indicators, if any, used in the audit and a rationale for each;</li> <li>c. the name of Program Participant that was audited, including its SFI representative;</li> <li>d. a general description of the Program Participant’s forestland included in the audit;</li> <li>e. the name of the certification body and lead auditor (names of the audit team members, including technical experts may be included at the discretion of the audit team and Program Participant);</li> <li>f. the dates the audit was conducted and completed;</li> <li>g. a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and</li> <li>h. the certification decision.</li> </ul> <p>The summary audit report will be posted on the SFI Inc. website (<a href="http://www.sfiprogram.org">www.sfiprogram.org</a>) for public review. CAR: The April 2019 Recertification Audit is not present on the SFI website, and there is no evidence/confirmation that it has been submitted. <b>Closed:</b> 2019 and 2020 Audit reports are currently posted on the SFI website.</p>
<p>Notes from Opening and Closing Meetings</p>	<p>Opening meeting held at the Potomac - Garrett State Forest (PGSF) office, closing meeting held at the Savage River State Forest (SRSF) office. State Forest level and Central Office level staff attended both meetings.</p>
<p>All logos and/or labels, including ANSI, ANAB, SFI, PEFC, ATFS, etc. are utilized correctly in accordance with NSF policies.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No (a finding of nonconformity should be issued)  <input type="checkbox"/> N/A (not using any labels or logos on any marketing materials, website, finished products, etc.)</p>

**E. Surveillance Review**

<p>Explain how the management system is capable of meeting the applicable requirements and expected outcomes of the audit</p>	
<p>Answer</p>	<p>MD DNR has demonstrated effective implementation by having their annual internal audits and management reviews each fiscal year. NSF auditor reviewed documented internal audits and management reviews, which demonstrate continued commitment by the organization. The organization addressed all internal/external findings including the recent external CAR &amp; OFIs issued by NSF in FY 2020. Leadership commitment was demonstrated during the field portion of the audit with good attendance by staff. The Annapolis Director /State Forester and Associate Director Forester have oversight and input into management system, were actively engaged in communications during a portion of this year’s NSF field audit. This interaction demonstrated leadership commitment and the willingness to contribute to meeting the MDNR objectives in forest certification.</p>



**F. Recertification Review**

Consider the performance of the program over the cycle through a review of all audits in the previous certification cycle, internal audits, management reviews, corrective actions and continual improvement. Describe the evidence supporting:

- effective interaction between all parts of the program and its overall effectiveness,
- overall effectiveness of the system in its entirety considering internal and external changes,
- demonstrated commitment by top management to maintain the system and maintain continuous improvement,
- program contribution to the achievement of the client’s policy and objectives, and the intended results.

If there were any repeat findings during the audit cycle that indicate systemic issues, explain how they were addressed.

Answer	n/a, surveillance audit
--------	-------------------------

**G. Appendices**

Appendix 1	Audit Notification Letter and Audit Agenda
Appendix 2	SFI Forest Management Public Summary Report
Appendix 3	SFI Forest Management Standard Audit Checklist
Appendix 4	Multi-site Checklist
Appendix 5	Site Visit Notes
Appendix 6	Meeting Attendance
Appendix 7	Forestry Program COVID-19 Report Appendix



## Appendix 1

# Audit Notification Letter

15 June 2021

Jack Perdue, Maryland DCR Forest Service  
580 Taylor Avenue  
Annapolis, MD 21401

## RE: SFI® Forest Management Surveillance Audit (S2 audit)

Dear Mr. Perdue,

As we discussed, I will be conducting your SFI® surveillance audit as described in the attached itinerary. Please confirm that these dates are still appropriate for the audit of your program's continued conformance to the below standard(s):

- SFI® 2015-2019 Standards and Rules: Section 2 – Forest Management
- SFI® 2015-2019 Standard and Rules: Section 5, Logo Use

## Preparing for the Audit

A key part of the audit is a review of selected evidence related to your program, which may include the below items:

- Forest Management Plans for the lands certified
- Status of Inventory and growth and yield modeling
- Approval for logo usage (if used)
- Verification of Controversial Sources
- Internal Audit records
- Management Review records
- Training records, license, certifications (Internal and external)
- Documentation for operation of complaint procedure
- Herbicide and Pesticide listing of chemicals and acreage
- Policies regarding certification, health, and safety (Example Organizations HR Manual)
- Wildlife habitat plans and forestry prescriptions
- BMP monitoring documents
- Documentation for monitoring, non-conformances identified and corrective action
- Contracts for harvesting and silvicultural activities, loggers/operators/truck drivers, and road building operators
- Listing of State and Regulatory contacts including but not limited to State regulations, SIC / 1-800- SFI
- Educational Opportunities for Loggers/landowners/community outreach
- Average sizes of clear cuts
- Cultural Resources
- Recreational Leases documents/records and monitoring program
- Verification of Controversial Sources
- Documentation for subcontracting/outsourcing
- Documentation for multisite organization (if applicable).

Please have this information available for me during the audit.

Additionally, **prior to the audit**, please ensure you:

- Address any open Corrective Action Requests you may have (see your last report)
- Confirm the scope of your certification (*eg. Scope/number of sites*) / any changes to management system
- Prepare summary records of certified sales
- Prepare summary records of any chemical use.



---

## SFI Objectives and Performance Measure (PM)/Indicators to be Assessed:

This year's assessment will include a review of the following SFI Objectives and Performance Measure (PM)/Indicators:

- Objective 2: Forest Health & Productivity
- Objective 3: Protection and Maintenance of Water Resources
- Objective 4: Conservation of Biological Diversity
- Objective 6: Protection of Special Sites,
- Objective 9: Legal and Regulatory Compliance
- Objective 13: Public Land Management Responsibilities
- Objective 14: Communications and Public Reporting
- Objective 15: Management Review & Continual Improvement
- As well as findings from the 2020 audit: OFI – 11.1.3, Minor CAR - 14.1.

A range of stakeholders may be consulted during the audit.

Scope of Certification: The forest management program of the Maryland Department of Natural Resources on the following Maryland State Forests: Chesapeake Forest Lands, Pocomoke State Forest, Green Ridge State Forest, Garrett State Forest, Potomac State Forest, and the Savage River State Forest. SFI Forest Management code: NSF-SFI-FM-0Y301.

---

## Sampling

Your responsibilities for Public Lands Stewardship include the role of “central administration” for this multi-site program. We will review the SFI multi-site requirements during the office/document review time of the audit.

The following sites are included in the overall scope: Chesapeake Forest Lands, Pocomoke State Forest, Green Ridge State Forest, **Garrett State Forest, Potomac State Forest, and the Savage River State Forest.** The 2021 audit will include 3 of these 6, as follows and noted in bold above: Garrett, Potomac, and Savage River State Forests. These forests were selected to include a broad cross-section of activities and of the sites, and to facilitate travel. Random sampling was not employed in the selection of these three State Forests, but is used in the selection of sites to be visited.

## Field Site Selection

Preliminary site selections include preparing a candidate site list of forest stands or areas harvested in the past 2 years with associated forestry environmental risk categories including FECV, RT&E, road construction, riparian areas, and other unique/special sites. Please provide this to your auditor(s) a minimum of 1 week before the audit.

The NSF team will select an initial subset of sites for your certificate and will ask for supplemental information on these sites, including their accessibility and the likelihood of being actively harvested during the visit. Once we review this information, we will select a subsample of sites to visit. Final site selection will occur during the opening meeting of the audit. On the opening day of the audit, we would ask you to tell us about any sales that are being worked at that time, and we would add one or two of these if possible. Staff should be prepared to review audit routes each morning.

## Role of SFI Inc. Office of Label Use and Licensing

As a reminder, your organization is responsible for contacting SFI, Inc. and complying with all requirements before using or changing any SFI label or logo. Your contact is:

Courtney P. Guillen  
Coordinator, Statistics and Label Use  
Sustainable Forestry Initiative  
Phone: 202.719.1391 ext. 338  
Email: [Courtney.Guillen@sfiprogram.org](mailto:Courtney.Guillen@sfiprogram.org)



## Health and Safety

Please advise the Audit Team of any health and safety requirements, especially PPE required. The audit team will not proceed in any situations which they deem to be unsafe.

## Audit Logistics

Travel: Auditor flights arrive Monday, July 19 to BWI, Auditors drive to PGSF or SRSF lodging.

Rental Car: Auditors will drive separately in their rental car(s) to and from Grantsville, MD and ride with MD DNR staff to field sites.

Lodging: Auditors to book lodging in coordination with client.

Meals: Lunches as arranged in coordination with Md DNR staff. Auditors' breakfast and dinner on their own or as arranged with MD DNR staff.

Meetings & Conference Rooms: Meetings will be held outside where possible; if held indoors, social distancing and adequate air flow will be provided. Separate COVID-19 detailed guidance will be sent via email, as part of NSF's Health and Safety Process. Auditors have been notified of client's COVID-19 policy and we will adhere to your policy.

Document Exchange: We will be using MD DNR's Google Drive to share and access files, as discussed during the pre-audit planning call. Please be prepared to upload any requested documents in advance of the audit, to limit sharing of paper documents among each other during the audit.

Staff and Stakeholder Interviews: Remote meetings may be set for key staff interviews prior to the audit, as arranged in coordination with MD DNR staff.

Other COVID-19 Details: Both auditors are fully vaccinated. When in-person interviews are conducted, schedules will have to be well-coordinated, so that auditors can achieve the needed interviews while maintaining adequate social distancing. Per NSF COVID-19 protocol, NSF auditors will wear masks when indoors.

## Audit Team Members and Contact information

Role	Name	Email	Phone Number
Lead Auditor:	Michelle Matteo	<a href="mailto:mmatteo@nsf.org">mmatteo@nsf.org</a>	413.265.3714
Team Member(s):	Beth Jacqmain	<a href="mailto:BJacqmain@scsglobalservices.com">BJacqmain@scsglobalservices.com</a>	218.256.2959

## Audit Report Topics and Follow-up Actions

A report will be provided to you following the audit, which includes background information, completed checklist, and any Corrective Action Requests (CARs) raised. It will be necessary to close out any CARs raised within the proposed timescale.

## Agenda for Review

Attached for your review is the tentative agenda that will guide the conduct of the audit. Please contact me via email or phone if you would like to recommend changes or have any questions regarding what is needed for the audit.

Thank you for selecting NSF to provide your audit services.

Sincerely,

Michelle Matteo

Senior Lead Auditor, NSF

413.265.3714

[michmatteo@nsf.org](mailto:michmatteo@nsf.org)



## Audit Agenda

### Type of Audit

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Readiness Review (Stage 1) | <input type="checkbox"/> Registration (Stage 2) | <input checked="" type="checkbox"/> Surveillance |
| <input type="checkbox"/> Reassessment               | <input type="checkbox"/> Transfer               | <input type="checkbox"/> Verification            |
| <input type="checkbox"/> Other _____                |   |  |

### Audit Objectives

Determine if certification should be maintained to the SFI 2015:2019 Standards and Rules®: Section 2, Forest Management.

### Schedule

Day/Date	Time *	Activity/Process and Location to be Audited	Auditor
		<b>Potomac-Garret State Forest (PGSF) – Opening meeting to be held at PGSF office, 1431 Potomac Camp Road, Oakland, MD 21550</b>	
The Audit Agenda will be agreed during the opening meeting at Central/Head Office. However, it may change during the audit, by the Audit Team Leader in response to issues identified during the assessment. A Site/Branch Audit will only require a summary opening meeting. Stakeholders will be consulted during field visits or by appointment.			
Tuesday 20 July 2021	8:00 am	Opening Meeting/Agenda Review <ul style="list-style-type: none"> <li>Introductions, Confirmation of Roles, Audit Objectives, and resources/facilities required by the audit team</li> <li>Review Audit Procedures and Plan, including; timetable, audit objectives, including standards used and selected requirements to be assessed, methods and procedures, including sampling process, determine Interviewees, confirmation of matters relating to confidentiality</li> <li>Formal communication channels between the audit team and auditee</li> <li>Review and discuss changes to the Facility Record Sheet (FRS) (contact information, billing information, review and confirm scope and Product Group List, changes in operations, etc.)</li> <li>Confirm relevant work safety, emergency and security procedures for the audit team</li> <li>Conditions under which audit may be terminated</li> <li>Discussion of corrective action requests / plans, including method of reporting audit findings / grading of CARs</li> <li>Review of findings (CARs-OFIs) raised during previous audits</li> <li>Conducting staff interviews in the absence of (line) management</li> <li>Overview of Logo or Label use</li> <li>Records of any complaints received by Company and Complaints/Appeals system on the conduct or conclusions of an Audit</li> <li>Overview by your staff of program</li> <li>Discuss field site visit provisions and other logistical issues</li> <li>Final site selection and audit route review</li> <li>Client questions</li> </ul>	Michelle Matteo, Beth Jacqmain
	8:30 am	Visit to the PGSF Office located at 1431 Potomac Camp Rd, Oakland, MD 21550 Confirm field staff have access to online forestry data for critical forestry activities PGSF Site visits	
	4:30 pm	Daily wrap-up	
	5:00 pm	End of day & return to Grantsville lodging	
		<b>Savage River State Forest (SRSF) office, 127 Headquarters Ln, Grantsville, MD 21536</b>	





Wednesday 21 July 2021	8:00 am	Abbreviated open meeting, Audit route review GIS Review - Confirm field staff have access to online forestry data for critical forestry activities	Michelle Matteo, Beth Jacqmain
		Site visits	
	4:30 pm	Daily wrap-up	
	5:00 pm	End of day & return to Grantsville lodging	
<b>Savage River State Forest (SRSF) office, 127 Headquarters Ln, Grantsville, MD 21536</b>			
Thursday 22 July 2021	8:00 am	Site visits – remainder of SRSF sites	Michelle Matteo, Beth Jacqmain
	11:00 am	<p>Review of Documentation and Evidence, including (but not limited to) the following:</p> <ul style="list-style-type: none"> <li>• SFI Program - Selected Objectives/PM</li> <li>• Written procedures, training records, trademark approvals, and outsourcing agreements</li> <li>• Management Plans</li> <li>• Overview of SFI Survey forms</li> <li>• Review Logo or Label use and claims on sales documents</li> <li>• Inventory Process and Updates</li> <li>• Annual Work Plans</li> <li>• Heritage Mapping: Biodiversity database</li> <li>• Historic/Cultural Sites</li> <li>• Forest Insect and Disease Program</li> <li>• Invasive Control Program</li> <li>• Management Review</li> <li>• Tax payments</li> <li>• Deed and lease information</li> <li>• OG</li> <li>• Monitoring records</li> <li>• Recent salvage activity/acreage</li> <li>• Multi-site requirements (if multi-site)</li> <li>• Other Issues</li> </ul> <p>Staff Interviews to confirm key personnel understanding of relevant responsibilities and effectiveness of training received. Auditor shall interview a sufficient variety and number of employees and contractors at each operational site selected for evaluation. If multi-site, employees interviewed at each of the selected sites.</p>	
	Time TBD	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm audit findings	
	Time TBD	<p>Closing Meeting</p> <ul style="list-style-type: none"> <li>• Audit review and advising that audit evidence is based on sampling process.</li> <li>• Discussion of preliminary audit findings; CAR grading, normative reference, timeframe for closure and consequences of not meeting closure deadlines.</li> <li>• Audit follow up: - NSF Report Review and final audit/certification decision.</li> <li>• Recording of any divergent opinions where they could not be resolved.</li> <li>• NSF Certification Complaints/Appeals system on the conduct or conclusions of an Audit (available on website).</li> </ul>	
		End	

\* Audit conducted jointly with both the SFI FM and the FSC FM audit; times approximate and may vary.



## Appendix 2

# Maryland DNR Forest Service 2020 SFI® Forest Management Summary Report

### Introduction

The SFI Program of the Maryland DNR Forest Service of Annapolis, Maryland has achieved continuing conformance with the SFI® 2015-2019 Forest Management Standard, including the sustainable harvest level requirement (Performance Measure 1.1), according to the NSF SFI-FS Certification Audit Process.

The Maryland DNR Forest Service initially obtained SFI Certification from NSF on July 24, 2003 and the program was re-certified in July 2006. Initially only the Chesapeake Forest Lands were certified, with the Pocomoke State Forest added in 2009 as part of an expansion of scope that included other recently acquired lands. In 2011 the organization sought and was granted recertification to the current scope based on an audit of the six largest state forests against the SFI 2010-2014 Standard. The state forests included in the current scope were re-certified to the SFI 2015-2019 Standards in April of 2014 and again in April 2019. The most recent audit was a partial surveillance audit conducted July 2021.

The multi-site certificate covers 6 different State Forests (Chesapeake Forest, Pocomoke State Forest, Green Ridge State Forest, Garrett State Forest, Potomac State Forest, and Savage River State Forests) also including the central office located in Annapolis MD. The 2019 audit included office reviews in the following Chesapeake Forest, Pocomoke State Forest, Green Ridge State Forest, and the central office located in Annapolis, MD. Field visits were conducted in 2 out of a total of 6 State Forests. This sample size was determined using the guidelines set forth in IAF-MD1. The State Foresters were selected based on a date rotation of total 6 different Forests. Approximately half of the field sites visited were randomly sampled. Within the 2 selected forests, NSF's lead auditor selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in NSF's protocols and procedures. 2 field offices, 1 central office and 14 field sites were visited.

The 14 field sites consisting of the 2 active timber harvest, 2 recently closed sale with wildlife considerations, 2 with herbicide application, 2 High Conservation Forest, 1 planting site, and 2 research sites (some sites met multiple considerations and are noted for each of those above). Both thinnings and final harvests were viewed for multiple sites. There were also several roads, several smaller road-trail/stream crossings with cross drains and BMPs being applied. Harvest levels are documented in Annual Work Plans and have been at or below levels identified in plans for MD DNR associated inventory and growth data as well as harvest-related planning documents are used to ensure that plans include long term harvest level and consistent with the growth and yield model generated by the PGSF and SRSF. Data from the 5-year stand-level inventory project was used to develop a volume-control target based allowable harvest levels for western forests.

Maryland DNR Forest Service has an extensive program for harvest planning and approval. A Sustainable Forest Management Plan has been developed for each forest, and these plans are regularly updated. Harvests levels have been modeled by forest type for sustainability by area control for a 50-year planning horizon. Based on the Sustainable Forest Management Plan an Annual Work Plan is developed for each forest including planned harvests and other management activities. The Annual Work Plan is reviewed by various agencies in the Maryland DNR, and a Citizen's Advisory Team. It is also posted on the Maryland DNR Forest Service website for public comment for a period of 30 days. Following review of comments, the finalized plan is approved and posted on the Maryland DNR Forest Service website.

This report describes the results of the 2021 Surveillance Audit which considered changes in operations, the management review system, and efforts at continuous improvement. A sample of the SFI requirements were selected for detailed review.

### Maryland's State Forests

Maryland DNR Forest Service is responsible for the management of the 209,207 acres of Maryland State Forests through a variety of designations. The Forest Service is supported by other agencies within the Department of Natural Resources including Wildlife, Fisheries, Heritage, and the Natural Resources Police. Various management plans provide a useful summary of the importance of these forestlands and the broad policy goals:

#### Excerpted from the Savage River State Forest Management Plan:

'The resources and values provided from state forests reach people throughout the State and beyond. These resources and values range from economic too aesthetic and from scientific too inspirational. The Department of Natural Resources is mandated by law to consider a wide variety of issues and uses when pursuing a management strategy for these forests. The importance of considering these factors is acknowledged in the Annotated Code, which establishes the following policy pertaining to state forests and parks:



"Forests, streams, valleys, wetlands, parks, scenic, historic and recreation areas of the state are basic assets. Their proper use, development, and preservation are necessary to protect and promote the health, safety, economy and general welfare of the people of the state. It is the policy of the state to encourage the economic development and the use of its natural resources for the improvement of the local economy, preservation of natural beauty, and promotion of the recreational and leisure interest throughout the state." (Annotated Code of Maryland, Natural Resources Article §5-102)

The Department recognizes the many benefits provided by state forests and has established a corresponding management policy in regulation.

"The state forests are managed to promote the coordinated uses of their varied resources and values for the benefit of all people, for all time. Water, wildlife, wood, natural beauty and opportunities for natural environmental recreation, wildlands experience, research demonstration areas, and outdoor education are major forest benefits." (Code of Maryland Regulations 08.07.01.01)

The 2021 Surveillance Audit was performed by NSF on July 20-22, 2021 by an audit team headed by Michelle Matteo Sr. Lead Auditor. Beth Jacqmain was the FSC Lead Auditor and supported the NSF lead auditor for SFI. Audit team members fulfill the qualification criteria for conducting audits contained in SFI 2015-2019 Standards and Rules, Section 9 - Procedures and Auditor Qualifications and Accreditation.

The objective of the audit was to assess conformance of the firm's SFI Program to the requirements of the SFI 2015-2019 Standard and Rules, Section 2 – Forest Management.

The scope of the audit included forest management operations. Forest practices that were the focus of field inspections included those that have been under active management over the planning period of the past 2 years. In addition, practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example); SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were also within the scope of the audit.

The SFI Standard was used without modifying any requirements. SFI requirements that are outside of the scope of Maryland's SFI program were excluded from the scope of the SFI Certification Audit as follows:

- Indicator 10.1.2. Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols ratified by the United States and/or Canada depending on jurisdiction of management. Maryland DNR Forest Service does not participate in research on genetically engineered trees.

## **Audit Process**

NSF initiated the SFI audit process with a series of planning phone calls and emails to reconfirm the scope of the audit, review the SFI Indicators and evidence to be used to assess conformance, verify that Maryland DNR Forest Service was prepared to proceed to the SFI Audit, and to prepare a detailed audit plan.

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable requirements. The plan provided for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of conformance. NSF also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF protocols. NSF selected and interviewed stakeholders such as contract loggers, landowners and other interested parties, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented. The activities of the central office were reviewed against the multi-site requirements as well.

The possible findings of the audit included conformance, major non-conformance, minor non-conformance, opportunities for improvement, and practices that exceeded the requirements of the standard.

A report was prepared and final approval was done by an independent Certification Board Member assigned by NSF. Follow-up or Surveillance Audits are required by the Sustainable Forestry Initiative Standard<sup>®</sup>. The next Surveillance Audit is scheduled for the third week of July 2022.



## Overview of Audit Findings

Maryland's SFI Program demonstrated conformance against the SFI 2015-2019 Standard. There was one major non-conformance, two minor non-conformances, and one "Opportunity for Improvement" in 2021. As such, the program has earned continuing certification with the plans in place to address the non-conformances.

OFIs identified in the 2020 audit have been resolved:

- 1. OFI SFI 11.1.3:** Staff education and training sufficient to their roles and responsibilities. OFI was originally issued in 2019. While the seed mix used on landings and roads has been previously approved by State Wildlife staff for food plots and for the Erosion and Sediment Control plan, there is an opportunity to improve staff education and training as it relates to the seed mixture (species and ratios) currently being applied on landings and roads, as only non-native, naturalized species are being used. 2020 audit note: Communications with other DNR staff confirm that native seed mixes are available as an option and are worth discussing with Forestry – this OFI remains open for the 2020 audit.  
MD-DNR 2020 response: The primary purpose for these seed mix is to provide a quick, reliable covering for disturbed soils and it provides that. It has been used for many years without an incident of being invasive. This seed mix was suggested by our Wildlife & Heritage Service as a good mix for wildlife benefits. It is preferred by our State Forest managers since it is readily available for purchase by logging contractors from local sources and based on its quality, price and productivity. It has been our experience that this planting falls out (diminishes) after about 5-years and must be disked and replanted to maintain these open areas that also serve as wildlife food plots. One of these re-establishment sites was visited during the 2019 audit at Green Ridge State Forest. **Closed:** Interviews with multiple DNR staff, including the State Botanist and Southern Region Ecologist, as well as the Nature Conservancy Conservation Ecologist show that multiple options have been discussed, and the MD DNR BOF is aware of the current seed mix and others that could be used.

One Minor CAR identified in the 2020 audit has been resolved:

**Minor CAR 2020.1: SFI 14.1.1:** A *Program Participant* shall provide a summary audit report, prepared by the *certification body*, to *SFI Inc.* after the successful completion of a certification, recertification or surveillance audit to the *SFI 2015-2019 Forest Management Standard*. The April 2019 Recertification Audit is not present on the SFI website, no confirmation was provided that it has been submitted. Progress in implementing this corrective action plan will be reviewed in subsequent surveillance audits. **Closed:** 2019 and 2020 Audit reports are currently posted on the SFI website.

There was 1 Opportunity For Improvement (OFI) identified in the 2021 audit:

- 1. SFI FM Std, Section 13.1.2: OFI** - There is an opportunity to improve the contact with local stakeholders, to clarify how the Compartment and Stand Silvicultural proposals noted in the Annual Work Plan (AWP) link to the corresponding Timber Sale Contract #s (TS#) that are enacted.  
This finding does not indicate a current deficiency but served to alert Maryland DNR Forest Service to areas that could be strengthened, or which could merit future attention.

There were three new Non-Conformances identified in the 2021 audit, two Minor corrective actions (CARs) and one Major corrective action:

Minors:

- 1. SFI FM Std, Section 1.1.1: MINOR CAR** – For the Pokomoke-Garrett SF (PGSF) and Savage River SF (SRSF) Forest Management Plans (FMP), the sections that describe forest modeling are not consistent with descriptions by field staff on how those are being implemented in operational planning. See SRSF – Section 5.12 - Forest Modeling, pg. 70, and PGSF – Section 5.12 - Forest Modeling, pg. 70.
- 2. SFI FM Std, Section 11.1.3: MINOR CAR** – Staff education and training sufficient to their roles and responsibilities. During the document review, it was found that Forest managers had multiple instances of not using the most recent template for contract documents. They did not follow the system documentation / procedures as prescribed by the MD Forest Service.

Major:

- 1. SFI Multi-site Standard, Sec. 4.1.1: MAJOR CAR, repeat issue** - Templates used for Harvests are maintained by the Central Office – multiple templates available for download contained errors or omissions. 352D – Special Conditions

NSF also identified the following area where forestry practices and operations of Maryland DNR Forest Service exceed the basic requirements of the standard:

- 1. SFI 11.1.2** Assignment and understanding of roles and responsibilities for achieving *SFI 2015-2019 Forest Management Standard objectives*.  
Excellent communication exists between the MD-DNR Forest Service staff and loggers. On the ground practices looked good and were consistently above average, in part resulting from the clear communications.



## General Description of Evidence of Conformity

NSF's audit team used a variety of evidence to determine conformance. The 2021 audit included State Forest reviews in the following by the NSF audit team, Savage River State Forest, Potomac-Garret State Forest, and the central office located in Annapolis, MD; the Central Office audit was completed off-site. Field visits were conducted in 2 out of a total of 6 State Forests. 2 field offices, 1 central office and 15 field sites were visited. The 15 field sites consisted of the 2 active timber harvests, 4 recently closed sale with wildlife considerations, 2 with herbicide application, 3 High Conservation Forests, 1 planting sites, 4 thinning sites, 3 regeneration/final harvests, 1 restoration site, and 1 deer enclosure site (some sites met multiple considerations and are noted for each of those above). Both thinnings and final harvests were viewed for multiple sites. There were also several roads, several smaller road-trail/stream crossings with cross drains and BMPs being applied. A further description of the audit evidence is provided below, organized by SFI Objective. NSF's audit team used a variety of evidence to determine conformance.

### Objective 1 Forest Management Planning

To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion.

**Summary of Evidence:** *While this Objective was not audited in 2021, in the past evidence included field observations of a range of sites. The forest management plans for both the Savage River State Forest and Potomac-Garret State Forest and supporting documentation and the associated inventory data and growth analyses were the key evidence of conformance for eastern forests.*

### Objective 2 Forest Health and Productivity

To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, afforestation, minimized chemical use, soil conservation, and protecting forests from damaging agents.

**Summary of Evidence:** *Field observations and associated records including annual work plans and "State Forest Database" reports were used to confirm practices. Maryland DNR Forest Service has programs for reforestation, for protection against insects, diseases, and wildfire, and for careful management of activities which could potentially impact soil and long-term productivity.*

### Objective 3 Protection and Maintenance of Water Resources

To protect the water quality of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices.

**Summary of Evidence:** *Field observations of a range of sites were the key evidence. Auditors visited the portions of field sites that were close to water various types of water resources, (primary waterways, secondary streams and drains) generally riparian buffers, and confirmed that these buffers were flagged during planning, painted prior to harvests and noted for input into GIS.*

### Objective 4 Conservation of Biological Diversity

To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote a diversity of types of habitat and successional stages, and the conservation of forest plants and animals, including aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.

**Summary of Evidence:** *Evidence included field observations, written plans and policies for the protection of old growth, High Conservation Value Forests sites.*

### Objective 5 Management of Visual Quality and Recreational Benefits

To manage the visual impact of forest operations and provide recreational opportunities for the public.

**Summary of Evidence:** *While this Objective was not audited in 2021, in the past evidence included field observations of active and completed harvesting operations and policies/procedures for visual quality. Visits to recreation sites and contacting various stakeholder seeking input and obtaining feedback on how the DNR balances public interests while providing various recreational opportunities.*

### Objective 6 Protection of Special Sites

To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.

**Summary of Evidence:** *Evidence included field observations of completed operations, assessments of GIS maps and other records of special sites, training records, and written protection plans. Partners within the DNR and outside stakeholders participate in identification of special sites and participate during audits.*



---

### **Objective 7 Efficient Use of Fiber Resources**

To minimize waste and ensure the efficient use of fiber resources.

*Summary of Evidence:* While this Objective was not audited in 2021, in the past evidence included field observations of recently completed operations, contract clauses, and discussions with supervising field foresters and interviews with loggers.

### **Objective 8 Recognize and Respect Indigenous Peoples' Rights**

To recognize and respect Indigenous Peoples' rights and traditional knowledge.

*Summary of Evidence:* While this Objective was not audited in 2021, in the past evidence included review of the management plans to confirm the policy statement developed to recognize and respect Indigenous Peoples' rights and interviews with MD-DNR staff.

### **Objective 9 Legal and Regulatory Compliance**

To comply with applicable federal, provincial, state and local laws and regulations.

*Summary of Evidence:* Field and office reviews of ongoing and completed operations were the most critical evidence. Foresters are licensed and have access to legal and regulatory listing electronic and hard copy.

### **Objective 10 Forestry Research, Science and Technology**

To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.

*Summary of Evidence:* While this Objective was not audited in 2021, in the past evidence included discussions with stakeholders and support for research on state forest lands. Forests are used for several ongoing research projects such as research projects involving, pollinators and prescribed burning, which are visited.

### **Objective 11 Training and Education**

To improve the implementation of sustainable forestry practices through appropriate training and education programs.

*Summary of Evidence:* While this Objective was not audited in 2021, in the past evidence included review of training records, and the records of support for the Maryland Master Logger Program.

### **Objective 12 Community Involvement and Landowner Outreach**

To broaden the practice of sustainable forestry through public outreach, education, and involvement, and to support the efforts of SFI Implementation Committees.

*Summary of Evidence:* While this Objective was not audited in 2021, in the past evidence included records provided by the audited organization and interviews.

### **Objective 13 Public Land Management Responsibilities**

To participate and implement sustainable forest management on public lands.

*Summary of Evidence:* The Citizen Advisory Committee confirms the involvement with the public inputs does occur.

### **Objective 14 Communications and Public Reporting**

To increase transparency and to annually report progress on conformance with the SFI Forest Management Standard.

*Summary of Evidence:* Reports filed with SFI Inc. and the SFI Inc. website provided the key evidence. The state forests web site includes the complete certification reports from the past years.

### **Objective 15 Management Review and Continual Improvement**

To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.

*Summary of Evidence:* The state forests web site includes the organization's Sustainable Forestry Initiative Management Reviews for the past 10 years. The most recent of these program reviews, agendas and notes from field reviews, and interviews with personnel from all involved levels in the organization were assessed.



---

## Relevance of Forestry Certification

Third-party certification provides assurance that forests are being managed under the principles of sustainable forestry, which are described in the Sustainable Forestry Initiative Standard as:

### 1. Sustainable Forestry

To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitats, recreation and aesthetics.

### 2. Forest Productivity and Health

To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, invasive exotic plants and animals and other damaging agents and thus maintain and improve long-term forest health and productivity.

### 3. Protection of Water Resources

To protect water bodies and riparian areas, and to conform with forestry best management practices to protect water quality.

### 4. Protection of Biological Diversity

To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, and ecological or natural community types.

### 5. Aesthetics and Recreation

To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.

### 6. Protection of Special Sites

To manage lands that are ecologically, geologically or culturally important in a manner that takes into account their unique qualities.

### 7. Responsible Fiber Sourcing Practices in North America

To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally and socially responsible.

### 8. Legal Compliance

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

### 9. Research

To support advances in sustainable forest management through forestry research, science and technology.

### 10. Training and Education

To improve the practice of sustainable forestry through training and education programs.

### 11. Community Involvement and Social Responsibility

To broaden the practice of sustainable forestry on all lands through community involvement, socially responsible practices, and through recognition and respect of Indigenous Peoples' rights and traditional forest-related knowledge.

### 12. Transparency

To broaden the understanding of forest certification to the SFI Standard by documenting certification audits and making the findings publicly available.

### 13. Continual Improvement

To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.



---

**14. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing**

*(Applies only to the SFI 2015-2019 Fiber Sourcing Standard)*

To avoid wood fiber from illegally logged forests when procuring fiber outside of North America, and to avoid sourcing fiber from countries without effective social laws.

**Source:** Sustainable Forestry Initiative® (SFI) Standard, 2015–2019 Edition

**For Additional Information Contact**

Daniel Freeman	Michelle Matteo	Jack Perdue
NSF Project Manager	NSF Forestry Program Manager	Maryland DNR Forest Service
789 N. Dixboro Road Ann Arbor, MI 48105	789 N. Dixboro Road Ann Arbor, MI 48105	580 Taylor Avenue Annapolis, MD 21401
734-214-6228	413-265-3714	410-260-8505
<a href="mailto:dfreeman@nsf.org">dfreeman@nsf.org</a>	<a href="mailto:mmatteo@nsf.org">mmatteo@nsf.org</a>	<a href="mailto:jack.perdue@maryland.gov">jack.perdue@maryland.gov</a>





Appendix 3

SFI™ Forest Management Standard Audit Checklist

OY301 – Maryland DNR Forest Service

Date of audit(s): 20-23 July 2021

1.2 Additional Requirements

SFI Program Participants with fiber sourcing programs (acquisition of roundwood and field-manufactured or primary-mill residual chips, pulp and veneer to support a forest products facility), must also conform to the SFI 2015-2019 Fiber Sourcing Standard.

Use of the SFI on-product labels and claims shall follow Section 5 - Rules for Use of SFI On-Product Labels and Off-Product Marks as well as ISO 14020:2000.

Input boxes for N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Notes: All uses comply.

Objective 1 Forest Management Planning

To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion.

Performance Measure 1.1

Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models.

Input boxes for N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Notes: Not evaluated this year

1.1.1 Forest management planning at a level appropriate to the size and scale of the operation, including:

- a. a long-term resources analysis;
b. a periodic or ongoing forest inventory;
c. a land classification system;
d. biodiversity at landscape scales;
e. soils inventory and maps, where available;
f. access to growth-and-yield modeling capabilities;
g. up-to-date maps or a geographic information system (GIS);
h. recommended sustainable harvest levels for areas available for harvest; and
i. a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy feedstock production, or biological diversity conservation, or to address climate-induced ecosystem change).

Input boxes for N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Notes: The Western Maryland Sustainable Forest Management Plans had major updates (non-policy changes) since the 2018 audit and are available for downloading on the individual state forest websites. The Chesapeake Forest and Pocomoke State Forests plans were updated in 2019 to reflect recent DNR policies (WMD state forest plans were not affected) and involved review and comments from the Interdisciplinary Team (IDT). The Sustainable Forest Management Plans are reviewed and updated nearly every year, often as a result of audit findings.

MINOR CAR – For the Pocomoke-Garrett SF (PGSF) and Savage River SF (SRSF) Forest Management Plans (FMP), the sections that describe forest modeling are not consistent with descriptions by field staff on how those are being implemented in operational planning. See SRSF – Section 5.12 - Forest Modeling, pg. 70, and PGSF – Section 5.12 - Forest Modeling, pg. 70.

1.1.2 Documented current harvest trends fall within long-term sustainable levels identified in the forest management plan.

Input boxes for N/A, Conforms, Exceeds, O.F.I., Minor NC, Major NC

Notes: Not evaluated this year

1.1.3 A *forest inventory* system and a method to calculate growth and yield.

- N/A     
  Conforms     
  Exceeds     
  O.F.I.     
  Minor NC     
  Major NC

Notes: Not evaluated this year

1.1.4 Periodic updates of *forest inventory* and recalculation of planned harvests to account for changes in growth due to *productivity* increases or decreases, including but not limited to: improved data, *long-term* drought, fertilization, *climate change*, changes in forest land ownership and tenure, or *forest health*.

- N/A     
  Conforms     
  Exceeds     
  O.F.I.     
  Minor NC     
  Major NC

Notes: Not evaluated this year

1.1.5 Documentation of forest practices (e.g., *planting*, fertilization and thinning) consistent with assumptions in harvest plans.

- N/A     
  Conforms     
  Exceeds     
  O.F.I.     
  Minor NC     
  Major NC

Notes: Not evaluated this year

### Performance Measure 1.2

*Program Participants* shall not convert one *forest cover type* to another *forest cover type*, unless in justified circumstances.

1.2.1 *Program Participants* shall not convert one *forest cover type* to another *forest cover type*, unless the conversion:

- a. Is in compliance with relevant national and regional *policy* and legislation related to land use and forest management;
- b. Would not convert *native* forest types that are rare and ecologically significant at the *landscape* level or put any *native* forest types at risk of becoming rare; and
- c. Does not create significant long-term adverse impacts on Forests with Exceptional Conservation Value, old-growth forests, forests critical to threatened and endangered species, and special sites.

- N/A     
  Conforms     
  Exceeds     
  O.F.I.     
  Minor NC     
  Major NC

Notes: Not evaluated this year

1.2.2 Where a *Program Participant* intends to convert another *forest cover type*, an assessment considers:

- a. *Productivity* and *stand* quality conditions and impacts which may include social and economic values;
- b. Specific ecosystem issues related to the site such as invasive species, insect or disease issues, riparian *protection* needs and others as appropriate to site including regeneration challenges; and
- c. Ecological impacts of the conversion including a review at the site and *landscape* scale as well as consideration for any appropriate mitigation measures.

- N/A     
  Conforms     
  Exceeds     
  O.F.I.     
  Minor NC     
  Major NC

Notes: Not evaluated this year

### Performance Measure 1.3

*Program Participants* shall not have within the scope of their certification to this *SFI Standard*, forest lands that have been converted to non-forest land use. Indicator:

1.3.1 Forest lands converted to other land uses shall not be certified to this *SFI Standard*. This does not apply to forest lands used for forest and *wildlife* management such as *wildlife* food plots or infrastructure such as forest roads, log processing areas, trails etc.

- N/A     
  Conforms     
  Exceeds     
  O.F.I.     
  Minor NC     
  Major NC

Notes: Not evaluated this year

## Objective 2 Forest Health and Productivity

To ensure *long-term* forest *productivity*, carbon storage and *conservation* of forest resources through prompt *reforestation*, *afforestation*, *minimized* chemical use, *soil conservation*, and protecting forests from damaging agents.

### Performance Measure 2.1

*Program Participants* shall promptly reforest after final harvest. Indicators:

- 2.1.1 Documented *reforestation* plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt *reforestation*, unless delayed for site-specific environmental or *forest health* considerations or legal requirements, through *planting* within two years or two *planting* seasons, or by planned *natural regeneration* methods within five years.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Forest Management plans provide direction; harvest prescriptions contain information regarding reforestation. Organizations harvest areas include a prescription for natural regeneration but the organization monitors and if needed planting does occur. Regeneration criteria are forest-type specific. Western-most two forests (SRSF and PGSF) use Oak-SILVAH for criteria and for protocols for regeneration surveys. No regeneration delays were observed.

Western: Viewed a sample of regeneration plots for previously harvested units. Regen plot data viewed, as well as the smaller plots that capture the herbaceous layer (26' plot, and 6' plot). Regeneration plots taken at year 4 or 5.

Regeneration criteria are forest-type specific. Confirmed that Western SFs use Oak-SILVAH for criteria and for protocols for regeneration surveys. No regeneration delays were observed in the field.

- 2.1.2 Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for *planting*, *direct seeding* and *natural regeneration*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Regeneration criteria are forest-type specific. Confirmed that Western SFs use Oak-SILVAH for criteria and for protocols for regeneration surveys. Protocol noted in silva. No regeneration delays were observed in the field. Individual stand prescriptions and visual walk through 3 to 5 years before harvest are also used. If there is not enough natural regeneration observed, then a plan is formulated with appropriate actions taken with planting of local nursery tree stock. Viewed regeneration plot data from Jacobs Road sale.

- 2.1.3 Plantings of exotic tree species should minimize risk to native ecosystems.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Western forests rarely plant, and normally only to meet wildlife habitat objectives. Native species are used.

- 2.1.4 *Protection* of desirable or planned advanced *natural regeneration* during harvest.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Observed on several active harvests in different regions that contractor and MD DNR foresters protected desirable or planned natural hardwood and also softwood regeneration during the active harvests.

- 2.1.5 *Afforestation programs* that consider potential ecological impacts of the selection and *planting* of tree species in non-forested *landscapes*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed through interviews and observations that AWP and ID Team processes ensure that any treatment designed to change species composition is designed and reviewed by a team with expertise in forestry, ecology, botany, and other skills as needed. No afforestation viewed on selected sites.

**Performance Measure 2.2**

*Program Participants* shall *minimize* chemical use required to achieve management *objectives* while protecting employees, neighbors, the public and the environment, including *wildlife* and *aquatic habitats*. Indicators:

2.2.1 *Minimized* chemical use required to achieve management *objectives*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Forest chemicals are applied only as needed, and generally to control or set-back understory vegetation hindering natural regeneration or to control invasive, exotic plants. Interviews and observations confirm that minimal chemicals are used to achieve the management object. Reviewed the storage sheds and chemical usage logs, all labeled and SDS viewed.

2.2.2 Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Some treatments used Glyphosate, which is accepted as one of the "least-Toxic" herbicides.

2.2.3 Use of pesticides registered for the intended use and applied in accordance with label requirements.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Trained foresters prescribe chemicals which are applied by trained applicators, and both parties check to ensure the uses align with label requirements. Interviewed licensed foresters on the PGSF & SRSF.

2.2.4 The World Health Organization (WHO) type 1A and 1B pesticides shall be prohibited, except where no other viable alternative is available.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed chemicals used (glyphosate, Triclopyr, Imazapyr, or sulfometuron methyl) are not on prohibited list. The FSC HHP list is used as a proxy and this as well as the WHO lists are reviewed.

2.2.5 Use of pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001) shall be prohibited.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed chemicals used (glyphosate, Triclopyr, Imazapyr, or sulfometuron methyl) are not on prohibited list.

2.2.6 Use of *integrated pest management* where feasible.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Reviewed spray logs for chemicals applied. Interviews and documentation show that chemicals are only applied after careful site analysis, development of a prescription, ID review, and by trained applicators. The treatment area is provided to the applicator on printed maps supplemented by GIS data (.shp file). The contractor provides GIS data showing "spray on" flight lines of the treatment area.

2.2.7 Supervision of forest chemical applications by state- or provincial-trained or certified applicators.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed MD DNR Forester and Forest Technicians hold current state-issued cards for Licensed Applicators in PGSF & SRSF. Confirmed that the aerial applicator holds a valid MD applicators license.

- 2.2.8 Use of management practices appropriate to the situation, for example:
- a. notification of adjoining landowners or nearby residents concerning applications and chemicals used;
  - b. appropriate multilingual signs or oral warnings;
  - c. control of public road access during and immediately after applications;
  - d. designation of streamside and other needed buffer strips;
  - e. use of positive shutoff and minimal-drift spray valves;
  - f. aerial application of forest chemicals parallel to buffer zones to *minimize* drift;
  - g. monitoring of water quality or safeguards to ensure proper equipment use and *protection* of streams, lakes and other water bodies;
  - h. appropriate transportation and storage of chemicals;
  - i. filing of required state or provincial reports; and/or
  - j. use of methods to ensure *protection* of *threatened and endangered* species.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: SF Forest interviews, review of SDS sheets and labels, and inspection of chemical storage shed confirmed a, c, d, h, i, and j. Confirmed through interviews all forests use ID Team to review, modify as needed, and approve all treatments including proposed chemical applications, ensuring d, g, and j. If chemical usage is needed, abutters are typically notified by personal communication.

### Performance Measure 2.3

*Program Participants* shall implement forest management practices to protect and maintain forest and soil *productivity*. Indicators:

- 2.3.1 Process to identify soils vulnerable to compaction, and use of appropriate methods, including the use of soil maps where available, to avoid excessive soil disturbance.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: GIS data layer is checked with NRCS published soils maps and used in forest management activities. Viewed GIS layers with foresters in both the PGSF & SRSF.

- 2.3.2 Use of erosion control measures to *minimize* the loss of soil and site *productivity*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Active field sites visited confirmed that various levels of erosion control measures were used including for example: water bars, cross drains, bridge installment, or corduroy of wet areas to minimize loss of soil and site productivity.

- 2.3.3 Post-harvest conditions conducive to maintaining site *productivity* (e.g., limited rutting, retained down woody debris, *minimized skid trails*).

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed by field observations that post-harvest conditions reflect efforts to maintain site productivity.

- 2.3.4 Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed by field observations that vigorous trees during various harvesting regimes were being retained.

- 2.3.5 Criteria that address harvesting and site preparation to protect soil *productivity*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed by field observations at various active sites visited that soil productivity was being protected in site preparation.

- 2.3.6 Road construction and skidding layout to *minimize* impacts to soil *productivity*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Auditors reviewed many road segments which have been recently upgraded on the SFs to improve access. For example, main skid trails were laid out by foresters on SF land to minimize impacts to the soil productivity. See field notes.

---

**Performance Measure 2.4**

*Program Participants* shall manage so as to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and *invasive exotic plants and animals*, to maintain and improve *long-term forest health, productivity and economic viability*. Indicators:

2.4.1 *Program* to protect forests from damaging agents.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Reviewed the MD Department of Agriculture Forest Pest Management Schedule for treatment of Hemlock Woolly Adelgid (HWA). NSF team visited in the field HWA site, see field notes. Emerald Ash Borer presence is being monitored. Staff is aware of the potential impact of EAB in the ash cover type.

Natural Heritage staff are in communication to help with any posts as needed. Dept of Ag will send the SF educational materials to provide to the general public. Forest pest update completed each spring. Viewed pest traps in the forest.

---

2.4.2 Management to promote healthy and productive forest conditions to *minimize* susceptibility to damaging agents.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed by field observations that foresters are managing for forest condition and looking to minimize susceptibility to damaging agents.

---

2.4.3 Participation in, and support of, fire and pest prevention and control *programs*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: MD DNR foresters are actively participating in pest prevention program with HWA. Many state forest workers are trained as wild fire fighters; confirmed training and discussed with field staff. See field notes.

---

**Performance Measure 2.5**

Program Participants that deploy improved planting stock, including varietal seedlings, shall use best scientific methods. Indicator:

2.5.1 *Program* for appropriate research, testing, evaluation and deployment of *improved planting stock*, including *varietal seedlings*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Few trees are planted on the western state forests. Trees planted in the eastern forests are sourced from providers which use scientific protocols.

---

**Objective 3 Protection and Maintenance of Water Resources**

To protect the water quality of rivers, streams, lakes, *wetlands* and other water bodies through meeting or exceeding *best management practices*.

**Performance Measure 3.1**

*Program Participants* shall meet or exceed all applicable federal, provincial, state and local water quality laws, and meet or exceed *best management practices* developed under Canadian or U.S. Environmental Protection Agency–approved water quality *programs*.

Indicators:

3.1.1 *Program* to implement federal, state or provincial water quality *best management practices* during all phases of management activities.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Foresters and contractors followed legal requirements and implement BMPs as needed. See also field notes.

3.1.2 Contract provisions that specify conformance to *best management practices*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Reviewed multiple **Attachment C** Compliance Agreements for the Standard Erosion and Sediment Control Plan for Forest Operations." See field notes. The standard provision in contracts is:

7. Sediment and Erosion Control. The Buyer shall be responsible for complying with all sediment and erosion control measures required by Title 4, Subtitle 1 of the Environment Article of The Annotated Code of Maryland. To that end the Buyer must have filled out and returned to (DNR Representative) Attachment C "Standard Erosion and Sediment Control Plan for Forest Harvest Operations" (hereinafter referred to as "Sediment Plan") prior to commencing any harvest activities. Failure to do so will render this Agreement voidable. The Sediment Plan is hereby expressly incorporated into this Agreement and compliance with it is required.

3.1.3 Monitoring of overall *best management practices* implementation.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Consulting foresters and DNR Foresters monitor use of BMPs. Approximately once a week the BMP monitoring inspections occur. Topics covered on the inspection forms include: landing, skid trails, safety, visual, stocking, and other items like trash. Pre-harvest checklist reviewed for multiple sites, and inspection sheets viewed for every harvest visited.

**Performance Measure 3.2**

*Program Participants* shall implement water, *wetland* and *riparian protection* measures based on soil type, terrain, vegetation, ecological function, harvesting system, state *best management practices (BMPs)*, provincial guidelines and other applicable factors.

Indicators:

3.2.1 *Program* addressing management and *protection* of rivers, streams, lakes, *wetlands*, other water bodies and *riparian areas* during all phases of management, including the layout and construction of roads and *skid trails* to maintain water reach, flow and quality.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed that Consulting foresters and MD DNR forests documents show mapping of rivers, streams, lakes, and other water bodies and are entered into GIS databases and timber sale maps. The riparian buffers (and other buffers for visual management or to protect steep areas or draws/dry ravines) were flagged during layout and then painted when layout is finalized; this was clearly observed in the field. See field notes.

3.2.2 Mapping of rivers, streams, lakes, *wetlands* and other water bodies as specified in state or provincial *best management practices* and, where appropriate, identification on the ground.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Observed during field visits; harvest plans include mapped water bodies.



---

3.2.3 Document and implement plans to manage and protect rivers, streams, lakes, *wetlands*, other water bodies and *riparian areas*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Harvest plans incorporate protection of various water bodies. Observed where public water supply was protected.

---

3.2.4 Plans that address wet-weather events in order to maintain water quality (e.g., *forest inventory* systems, wet-weather tracts, definitions of acceptable operating conditions).

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Wet weather operations covered in Policy and Procedures Handbook for Western MD (3/27/2019 page7). Foresters have identified wet weather tracts in each forest visited.

---



## Objective 4 Conservation of Biological Diversity

To manage the quality and distribution of *wildlife habitats* and contribute to the *conservation of biological diversity* by developing and implementing *stand-* and *landscape-*level measures that promote a diversity of types of *habitat* and successional stages, and the *conservation* of forest plants and animals, including *aquatic species*, *as well as threatened and endangered species*, *Forests with Exceptional Conservation Value*, *old-growth forests* and ecologically important sites.

### Performance Measure 4.1

Program Participants shall conserve biological diversity. Indicators:

4.1.1 Program to incorporate the *conservation of native biological diversity*, including species, *wildlife habitats* and ecological community types at *stand* and *landscape* levels.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Field sites visited included sites where foresters incorporate wildlife habitats considerations, including for example items recognized on the Natural Heritage data base. Natural Heritage completes landscape level analysis and will update the state datasets when needed. Interviews confirm that foresters are aware of the on-going updates. Habitat considerations are also used for example with landscape level programs, such as the Frosted Elfin Butterfly habitat restoration projects. See field notes.

4.1.2 Development of criteria and implementation of practices, as guided by regionally based *best scientific information*, to retain *stand-level wildlife habitat* elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Active and inactive field sites visited in multiple regions; observed snags, stumps, mast trees, down woody debris, and den trees were being left and in order to implement the agency goals.

4.1.3 Document diversity of *forest cover types* and age or size classes at the individual ownership or forest tenure level, and where credible data are available, at the *landscape* scale. Working individually or collaboratively to support diversity of *native forest cover types* and age or size classes that enhance *biological diversity* at the *landscape* scale.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed some RSAs are present in the Forests that were visited. Confirmed in Forest Management Plan.

4.1.4 Program Participants shall participate in or incorporate the results of state, provincial, or regional *conservation* planning and priority-setting efforts to conserve biological diversity and consider these efforts in forest management planning. Examples of credible priority-setting efforts include state *wildlife* action plans, state forest action plans, relevant *habitat conservation* plans or provincial *wildlife* recovery plans.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Foresters are aware of the state-wide plan and some foresters incorporate the results of State Wildlife Action Plan information (such as the species assessments) into the initial phases of the management plan process. Interviews confirmed that consultant foresters and MD DNR are aware of the state wildlife action plan. ID Team has input over all Work Plans during the review process.

4.1.5 Program to address *conservation* of known sites with viable occurrences of significant species of concern.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Forester described process for investigating occurrences:

- Checked for and found occurrence on GIS layer.
- Look up guidance and descriptions.
- Analyzed and evaluated site potential for actual occurrences.
- Foresters work with the natural heritage; confirmed through interviews.

4.1.6 Identification and *protection of non-forested wetlands*, including bogs, fens and marshes, and *vernal pools* of ecological significance.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Foresters communicated to the auditors that when they recon for forestry operations, they will flag and protect features such as Vernal Pools. Sites will be documented by GPS and reported to the MD DNR office. Discussions occurred that MD DNR has an active hunting club lease at some locations and long-term monitoring. See field notes.

4.1.7 Participation in *programs* and demonstration of activities as appropriate to limit the introduction, spread and impact of *invasive exotic plants and animals* that directly threaten or are likely to threaten *native* plant and animal communities.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Demonstrated management of an invasive species such as HWA. See field notes.

4.1.8 Consider the role of natural disturbances, including the use of prescribed or natural fire where appropriate, and *forest health* threats in relation to *biological diversity* when developing forest management plans.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: At last year's audit, auditors observed on the Foster Tract Prescribed Burn, 30-acre active burn in progress on an early successional ESA. No burning was observed in 2021.

#### Performance Measure 4.2

Program Participants shall protect threatened and endangered species, Forests with Exceptional Conservation Values (FECV) and old-growth forests. Indicators:

4.2.1 Program to protect threatened and endangered species.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Program uses the Natural Heritage database to be aware of and protect threatened and endangered species. Wolf Swamp ESA (an HCVF) was visited. Projects for the Frosted Elfin butterfly and Henslow's sparrow were visited and discussed in detail. See field notes. Viewed sensitive goshawk areas as well and discussed limited harvest operation times, if active nests were present.

4.2.2 *Program* to locate and protect known sites flora and fauna associated with viable occurrences of *critically imperiled* and *imperiled* species and communities also known as *Forests with Exceptional Conservation Value*. Plans for *protection* may be developed independently or collaboratively, and may include *Program Participant* management, cooperation with other stakeholders, or use of easements, *conservation* land sales, exchanges, or other *conservation* strategies.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Foresters check the Natural Heritage data base and protect threatened and endangered species.

4.2.3 Support of and participation in plans or *programs* for the *conservation of old-growth forests* in the region of ownership or forest tenure.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed with observations and document review that some forests have a separate map or listing capturing possible old-growth forests within the state land ownership.

### Performance Measure 4.3

*Program Participants* shall manage ecologically important sites in a manner that takes into account their unique qualities. Indicators:

4.3.1 Use of information such as existing natural heritage data or expert advice in identifying or selecting ecologically important sites for *protection*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Discussion of the Delmarva Fox Squirrel, habitat needs old growth; field discussions occurred with Natural Heritage representative. HCVF, mature loblolly pine to be removed to promote mature pond pine and future DFS habitat (Watershed/Oak Hickory Pond Pine with short leaf but no loblolly pine). Discussion on old growth issues. Retention of mixed species.

4.3.2 Appropriate mapping, cataloging and management of identified ecologically important sites.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Reviewed documented procedures: "Methodology for Locating Representative Sample Areas (RSA) for Naturally Occurring Ecosystems within the Region of Maryland State Forests April 2012".

### Performance Measure 4.4

*Program Participants* shall apply knowledge gained through research, science, technology and field experience to manage *wildlife habitat* and contribute to the *conservation of biological diversity*. Indicators:

4.4.1 Collection of information on *Forests with Exceptional Conservation Value* and other *biodiversity*-related data through *forest inventory* processes, mapping or participation in external *programs*, such as NatureServe, state or provincial heritage *programs*, or other credible systems. Such participation may include providing non-proprietary scientific information, time and assistance by staff, or in-kind or direct financial support.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Monitoring and Inventory by Natural Heritage Program Staff on State Forests:

#### Savage River State Forest

- Survey of frosted elfin (*Callophrys irus*) (1 day)
- Allegheny woodrat (*Neotoma magister* - state endangered) population mark/recapture live trap monitoring, rattlesnake, and RTE breeding bird monitoring at High Rock (annual research activity since 1990).
- Allegheny woodrat latrine/midden survey at Coleman Hollow, Meadow Mt. Rocks, Bobcat Rocks.
- Monitored West Virginia white (*Pieris virginienensis* - state rare) butterfly population at a site along the upper Savage River.
- Monitored Fraser's sedge (*Carex fraseriana* - state endangered), Filmy angelica (*Angelica triquinata* - state endangered), and rose twisted-stalk (*Streptopus lanceolatus* - state threatened) in Savage Ravines Wildland.
- Monitored bat populations through moving acoustic route recording - annual research project since 2010. (Dr. Ed Gates/Juliet Nagel/Dan Feller)
- Monitored Coleman Hollow/South Savage Old Growth forest stands.

#### Potomac-Garrett State Forest

- Monitored Franz's cave amphipod (*Stygobromus franzi* - state in need of conservation), Allegheny spring isopod (*Caecidotea alleghenyensis* - state endangered), and a planaria (*Procotyla typhlops* - state endangered) at Mellot Rd. Spring Complex.
- Monitored bat populations through stationary acoustic recorders at Garrett State Forest. (Dr. Ed Gates/Ben Neece/Dan Feller)
- Allegheny woodrat latrine/midden survey at Lostland Run rocks and Backbone Mt. Wildland.
- Monitored Wild bleeding heart (*Dicentra eximia* - state threatened) population at Backbone Mt. Wildland.



---

4.4.2 A methodology to incorporate research results and field applications of *biodiversity* and ecosystem research into forest management decisions.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: **Russell Road, Bakerstown** acquisition, land to be managed with listed species. Discussion of the Frosted Elfin Butterfly. See field notes.

---



**Objective 5 Management of Visual Quality and Recreational Benefits**

To manage the visual impact of forest operations and provide recreational opportunities for the public.

**Performance Measure 5.1**

*Program Participants* shall manage the impact of harvesting on *visual quality*. Indicators:

5.1.1 Program to address visual quality management.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

5.1.2 Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

**Performance Measure 5.2**

*Program Participants* shall manage the size, shape and placement of clearcut harvests. Indicators:

5.2.1 Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements, achieve ecological *objectives* or to respond to *forest health* emergencies or other natural catastrophes.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

5.2.2 Documentation through internal records of clearcut size and the process for calculating average size.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

**Performance Measure 5.3**

*Program Participants* shall adopt a *green-up requirement* or alternative methods that provide for *visual quality*. Indicators:

5.3.1 Program implementing the *green-up requirement* or alternative methods.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

5.3.2 Harvest area tracking system to demonstrate conformance with the *green-up requirement* or alternative methods.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

5.3.3 Trees in clearcut harvest areas are at least 3 years old or 5 feet (1.5 meters) high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the *performance measure* are utilized by the *Program Participant*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

**Performance Measure 5.4**

*Program Participants* shall support and promote recreational opportunities for the public. Indicator:

5.4.1 Provide recreational opportunities for the public, where consistent with forest management *objectives*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

---

**Objective 6** *Protection of Special Sites*

To manage lands that are geologically or *culturally important* in a manner that takes into account their unique qualities.

**Performance Measure 6.1**

*Program Participants* shall identify *special sites* and manage them in a manner appropriate for their unique features. Indicators:

6.1.1 Use of information such as existing natural heritage data, expert advice or stakeholder consultation in identifying or selecting *special sites* for *protection*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Stakeholder consultation in identifying or selecting special sites for protection is noted in the on-line data base. See field notes.

---

6.1.2 Appropriate mapping, cataloging and management of identified *special sites*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Review of plans and GIS, confirmed with visits to the field.

---



---

## Objective 7 Efficient Use of Fiber Resources

To *minimize* waste and ensure the efficient use of fiber resources.

### Performance Measure 7.1

*Program Participants* shall employ appropriate forest harvesting technology and in-woods manufacturing processes and practices to *minimize* waste and ensure efficient utilization of harvested trees, where consistent with other *SFI Standard objectives*. Indicator:

7.1.1 *Program* or monitoring system to ensure efficient utilization, which may include provisions to ensure:

- a. management of harvest residue (e.g., slash, limbs, tops) considers economic, social and environmental factors (e.g., organic and nutrient value to future forests and the potential of increased fuels build-up) and other utilization needs;
- b. training or incentives to encourage loggers to enhance utilization;
- c. exploration of markets for underutilized species and low-grade wood and alternative markets (e.g., bioenergy markets); or
- d. periodic inspections and reports noting utilization and product separation.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

---



**Objective 8 Recognize and Respect *Indigenous Peoples'* Rights**

To recognize and respect *Indigenous Peoples'* rights and traditional knowledge.

**Performance Measure 8.1**

Program Participants shall recognize and respect Indigenous Peoples' rights. Indicator:

8.1.1 *Program Participants* will provide a written *policy* acknowledging a commitment to recognize and respect the rights of *Indigenous Peoples*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

**Performance Measure 8.2**

*Program Participants* with forest management responsibilities on public lands shall confer with affected *Indigenous Peoples* with respect to sustainable forest management practices. Indicator:

8.2.1 *Program* that includes communicating with affected *Indigenous Peoples* to enable *Program Participants* to:

- a. understand and respect traditional forest-related knowledge;
- b. identify and protect spiritually, historically, or culturally important sites;
- c. address the use of non-timber forest products of value to *Indigenous Peoples* in areas where *Program Participants* have management responsibilities on public lands; and
- d. respond to *Indigenous Peoples'* inquiries and concerns received.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

**Performance Measure 8.3**

*Program Participants* are encouraged to communicate with and shall respond to local *Indigenous Peoples* with respect to sustainable forest management practices on their private lands. Indicators:

8.3.1 *Program Participants* are aware of *traditional forest-related knowledge*, such as known cultural heritage sites, the use of wood in traditional buildings and crafts, and flora that may be used in cultural practices for food, ceremonies or medicine.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: This program does not manage private lands.

8.3.2 Respond to *Indigenous Peoples'* inquiries and concerns received.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: This program does not manage private lands.



## Objective 9 Legal and Regulatory Compliance

To comply with applicable federal, provincial, state and local laws and regulations.

### Performance Measure 9.1

*Program Participants* shall comply with applicable federal, provincial, state and local *forestry* and related social and environmental laws and regulations. Indicators:

9.1.1 Access to relevant laws and regulations in appropriate locations.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Foresters confirmed they have access to relevant laws and regulations in the organization's internal web page for their reference or on the forester's computer with bookmarks for needed and frequently visited pages. Observed field offices visited had Federal, State laws and regulations posted.

9.1.2 System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Chemicals stored with labeling and SDS, viewed chemical storage at each field office visited in 2021. Foresters' reports track usage to ensure compliance with federal, state and local laws and regulations as it relates to chemical management. Field visits on active harvests confirmed necessary permits.

9.1.3 Demonstration of commitment to legal compliance through *available regulatory action information*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed through field visits that organization is committed to legal compliance and BMPs.

### Performance Measure 9.2

*Program Participants* shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the *Program Participant* operates. Indicators:

9.2.1 Written *policy* demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, *Indigenous Peoples'* rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Field observations confirmed numerous posters posted in each MD DNR State office and consulting office visited. including for example: EEO, anti-harassment and anti-discrimination, right to know, workers right to organize, and OSHA.

9.2.2 *Forestry enterprises* will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Through interviews confirmed Annapolis Director/State Forester and Associate Director/Forester that there were no known ILO complaints.

## Objective 10 Forestry Research, Science and Technology

To invest in *forestry* research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of *climate change* impacts on forests, *wildlife* and *biological diversity*.

### Performance Measure 10.1

*Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners provide in-kind support or funding for forest research to improve *forest health*, *productivity* and sustainable management of forest resources, and the environmental benefits and performance of forest products. Indicators:

10.1.1 Financial or in-kind support of research to address questions of relevance in the region of operations. Examples could include, but are not limited to, areas of forest *productivity*, water quality, biodiversity, community issues, or similar areas which build broader understanding of the benefits and impacts of forest management.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

10.1.2 Research on genetically engineered trees via *forest tree biotechnology* shall adhere to all applicable federal, state, and provincial regulations and international protocols ratified by the United States and/or Canada depending on jurisdiction of management.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

### Performance Measure 10.2

*Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners develop or use state, provincial or regional analyses in support of their *sustainable forestry programs*. Indicator:

10.2.1 Participation, individually and/or through cooperative efforts involving *SFI Implementation Committees* and/or associations at the national, state, provincial or regional level, in the development or use of some of the following:

- a. regeneration assessments;
- b. growth and drain assessments;
- c. *best management practices* implementation and conformance;
- d. *biodiversity conservation* information for family forest owners; and
- e. social, cultural or economic benefit assessments.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

### Performance Measure 10.3

*Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners broaden the awareness of *climate change* impacts on forests, *wildlife* and *biological diversity*. Indicators:

10.3.1 Where available, monitor information generated from regional climate models on *long-term forest health*, *productivity* and *economic viability*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

10.3.2 *Program Participants* are knowledgeable about *climate change* impacts on *wildlife*, *wildlife habitats* and *conservation of biological diversity* through international, national, regional or local *programs*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

## Objective 11 Training and Education

To improve the implementation of *sustainable forestry* practices through appropriate training and education *programs*.

### Performance Measure 11.1

*Program Participants* shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the *SFI 2015-2019 Forest Management Standard*. Indicators:

11.1.1 Written statement of commitment to the *SFI 2015-2019 Forest Management Standard* communicated throughout the organization, particularly to facility and woodland managers, and field foresters.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Written statement is found in a variety of documents including:

- Website: <https://dnr.maryland.gov/forests/Pages/forestcert.aspx>
- Notation on the Executive Order
- Link to download a pdf of the SFI Standard

11.1.2 Assignment and understanding of roles and responsibilities for achieving *SFI 2015-2019 Forest Management Standard objectives*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Field interviews confirmed that foresters understand roles and responsibilities. Confirmed documented MD Forest Service Organization chart signed May 2016 by the Director/State Forester.

Excellent communication exists between the MD-DNR Forest Service staff and loggers. On the ground practices looked good and were consistently above average, in part resulting from the clear communications.

11.1.3 Staff education and training sufficient to their roles and responsibilities.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Multiple samples of training documentation reviewed, including:

FY 2019 Webinar/Training, Climate Change Vulnerability Assessment for the Mid-Atlantic Region, Patricia Leopold Climate Change Outreach Specialist Northern Institute of Applied Climate Science (NIACS) pesticide applicator licenses/credentials, Forester license CEUs.

During the document review, it was found that Forest managers had multiple instances of not using the most recent template for contract documents. MDDNR Forest Service has Forest Management training two times per year which included informing managers of required forms provided here, <https://dnr.maryland.gov/forests/Pages/timbersales.aspx>.

Staff have continued to use outdated templates for the harvest contracts and addendums. They did not follow procedures as prescribed by the MD Forest Service. Procedures which note the contract forms to use are listed below:

"Maryland Department of Natural Resources Forest Service, Operation Order 2015-601", Effective: April 1, 2015, Timber Operation Order, page 16. Section 5. Administrative Requirements. (d) Contract forms.

11.1.4 Contractor education and training sufficient to their roles and responsibilities.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Interviewed contractors on active sale and they were current with MD Master Logger.

11.1.5 *Program Participants* shall have written agreements for the use of *qualified logging professionals* and/or *certified logging professionals* (where available) and/or *wood producers* that have completed training programs and are recognized as *qualified logging professionals*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Reviewed agreements. See field notes.

**Performance Measure 11.2**

*Program Participants* shall work individually and/or with *SFI Implementation Committees*, logging or *forestry* associations, or appropriate agencies or others in the *forestry* community to foster improvement in the professionalism of *wood producers*.

Indicators:

11.2.1 Participation in or support of *SFI Implementation Committees* to establish criteria and identify delivery mechanisms for *wood producer* training courses and periodic continuing education that address:

- a. awareness of sustainable forestry principles and the SFI program;
- b. best management practices, including streamside management and road construction, maintenance and retirement;
- c. reforestation, invasive exotic plants and animals, forest resource conservation, aesthetics and special sites;
- d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat (e.g., Forests with Exceptional Conservation Value);
- e. awareness of rare forested natural communities as identified by provincial or state agencies, or by credible organizations such as NatureServe, The Nature Conservancy, etc.
- f. logging safety;
- g. U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (CCOHS) regulations, wage and hour rules, and other provincial, state and local employment laws;
- h. transportation issues;
- i. business management;
- j. public policy and outreach; and
- k. awareness of emerging technologies.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Communication with the MD-DEL SFI SIC Chair, Todd Berman, during the NSF audit and confirmed that MD DNR is an active participant in the state SIC. Reviewed multiple meeting minutes & agendas, confirming involvement and topics that cover a) to k) above.

11.2.2 The *SIC*-approved *wood producer* training *programs* shall have a continuing education component with coursework that supports the current training *programs*, safety and the *principles* of *sustainable forestry*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: To gain Active Master Logger status, program participants must initially complete 4 four-hour core courses within two years and submit proof of current First Aid and CPR training.

The four core courses are:

- OSHA Regulations and Logging Safety
- Sustainable Forestry I: Sediment and Erosion Control, Spill Cleanup and Prevention, Logging Aesthetics
- Sustainable Forestry II: Basic Forestry and Silviculture, Forest Certification
- Sustainable Forestry III: Threatened and Endangered Species, Logger Activism

Regular updates are also required.

- 11.2.3 Participation in or support of *SFI Implementation Committees* to establish criteria for recognition of logger certification programs, where they exist, that include:
- a. completion of *SFI Implementation Committee* recognized logger training programs and meeting continuing education requirements of the training program;
  - b. independent in-the-forest verification of conformance with the logger certification program standards;
  - c. compliance with all applicable laws and regulations including responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act and other measures to protect *wildlife habitat*;
  - d. use of *best management practices* to protect water quality;
  - e. logging safety;
  - f. compliance with acceptable *silviculture* and utilization standards;
  - g. aesthetic management techniques employed where applicable; and
  - h. adherence to a management or harvest plan that is site specific and agreed to by the forest landowner.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: There is no logger certification program in Maryland; the Maryland Master Logger Program fits the description under 11.2.1 above.

## Objective 12 Community Involvement and Landowner Outreach

To broaden the practice of *sustainable forestry* through public outreach, education, and involvement, and to support the efforts of *SFI Implementation Committees*.

### Performance Measure 12.1

*Program Participants* shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, *conservation* organizations, *Indigenous Peoples* and governments, community groups, sporting organizations, labor, universities, extension agencies, the *American Tree Farm System*® and/or other landowner cooperative *programs* to apply *principles* of sustainable forest management. Indicators:

12.1.1 Support, including financial, for efforts of *SFI Implementation Committees*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

12.1.2 Support, individually or collaboratively, education and outreach to forest landowners describing the importance and providing implementation guidance on:

- a. best management practices;
- b. reforestation and afforestation;
- c. visual quality management;
- d. conservation objectives, such as critical wildlife habitat elements, biodiversity, threatened and endangered species, and Forests with Exceptional Conservation Value;
- e. management of harvest residue (e.g., slash, limbs, tops) considers economic, social, environmental factors (e.g., organic and nutrient value to future forests) and other utilization needs;
- f. control of invasive exotic plants and animals;
- g. characteristics of *special sites*; and
- h. reduction of wildfire risk.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

12.1.3 Participation in efforts to support or promote *conservation* of managed forests through voluntary market-based incentive *programs* such as current-use taxation *programs*, *Forest Legacy Program* or *conservation* easements.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

### Performance Measure 12.2

*Program Participants* shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management. Indicator:

12.2.1 Periodic educational opportunities promoting *sustainable forestry*, such as

- a. field tours, seminars, websites, webinars or workshops;
- b. educational trips;
- c. self-guided forest management trails;
- d. publication of articles, educational pamphlets or newsletters; or
- e. support for state, provincial, and local *forestry* organizations and soil and water *conservation* districts.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year



---

**Performance Measure 12.3**

*Program Participants* shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other *Program Participants* regarding practices that appear inconsistent with the *SFI Standard principles and objectives*. Indicators:

12.3.1 Support for *SFI Implementation Committees* (e.g., toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

---

12.3.2 Process to receive and respond to public inquiries. *SFI Implementation Committees* shall submit data annually to *SFI Inc.* regarding concerns received and responses.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Not evaluated this year

---

---

**Objective 13 Public Land Management Responsibilities**

To participate and implement sustainable forest management on *public lands*.

**Performance Measure 13.1**

*Program Participants* with forest management responsibilities on *public lands* shall participate in the development of *public land* planning and management processes. Indicators:

13.1.1 Involvement in *public land* planning and management activities with appropriate governmental entities and the public.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Board of Public Works - DNR timber sales directive. The sale of forest products is ultimately approved by the Maryland Board of Public Works (incl. Governor, Comptroller, Treasurer). Sale valued at less than \$50,000 has been delegated to the DNR.

The Timber Operations Order directs our timber sale process which includes the 3-step review process:

1. Interdisciplinary Team (IDT) (III-D-2-a-4)
2. Citizens Advisory Committee (III-D-2-a-9 through 11), and
3. 30-day public review process (III-D-2-a-11)

Environmental Review Policy - This process guides internal/external activities (e.g., research, special events, construction, state forests activities outside of the annual work plan development, including easements, emergency timber sales) on DNR lands.

- Purpose: To establish a consistent, coordinated procedure for internal review of proposed projects and actions that affect the responsibilities of various units of the Department of Natural Resources in protecting, enhancing and providing for balanced use of the Natural Resources of the State.
- State Forest management plans include some documented information about other governmental entities.

---

13.1.2 Appropriate contact with local stakeholders over forest management issues through state, provincial, federal or independent collaboration.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: All State Forests have a Forest Lands Citizens Advisory Committee members. Confirmed that meetings have occurred and that there is a process for receiving public comment.

Roles for the CAC are noted within the timber operations order, found at:

<https://dnr.maryland.gov/forests/Pages/timbersales.aspx> and here:

[https://dnr.maryland.gov/forests/Documents/Tbr\\_Ops\\_Procedures\\_2015-601\\_v2.pdf](https://dnr.maryland.gov/forests/Documents/Tbr_Ops_Procedures_2015-601_v2.pdf)

**OFI** –There is an opportunity to improve the contact with local stakeholders, to clarify how the Compartment and Stand Silvicultural proposals noted in the Annual Work Plan (AWP) link to the corresponding Timber Sale Contract #s (TS#) that are enacted.

---



## Objective 14 Communications and Public Reporting

To increase transparency and to annually report progress on conformance with the *SFI Forest Management Standard*.

### Performance Measure 14.1

A *Program Participant* shall provide a summary audit report, prepared by the *certification body*, to *SFI Inc.* after the successful completion of a certification, recertification or surveillance audit to the *SFI 2015-2019 Forest Management Standard*. Indicator:

14.1.1 The summary audit report submitted by the *Program Participant* (one copy must be in English), shall include, at a minimum,

- a. a description of the audit process, *objectives* and scope;
- b. a description of substitute *indicators*, if any, used in the audit and a rationale for each;
- c. the name of *Program Participant* that was audited, including its *SFI* representative;
- d. a general description of the *Program Participant's* forestland included in the audit;
- e. the name of the *certification body* and *lead auditor* (names of the *audit team* members, including *technical experts* may be included at the discretion of the *audit team* and *Program Participant*);
- f. the dates the audit was conducted and completed;
- g. a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and
- h. the certification decision.

The summary audit report will be posted on the *SFI Inc.* website ([www.sfiprogram.org](http://www.sfiprogram.org)) for public review.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: These reports contain the required information and are posted on the SFI Inc. website ([www.sfiprogram.org](http://www.sfiprogram.org)):

- April 2019 Re-certification Audit Maryland NSF-ISR
- October 2020 Surveillance Audit - FM Maryland NSF-ISR

### Performance Measure 14.2

Program Participants shall report annually to SFI Inc. on their conformance with the SFI 2015-2019 Forest Management Standard. Indicators:

14.2.1 Prompt response to the *SFI* annual progress report survey.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Confirmed that the MD DNR annually responds and files the SFI Inc. annual progress report survey.

14.2.2 Record keeping for all the categories of information needed for *SFI* annual progress report surveys.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Record keeping is kept in hard copy and electronic format in order to provide documented evidence to the SFI annual progress report surveys.

14.2.3 Maintenance of copies of past survey reports to document progress and improvements to demonstrate conformance to the *SFI 2015-2019 Forest Management Standard*.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Reports are kept in files, and those back through 2009 are kept on-line. Witnessed past report FY 2019.



**Objective 15 Management Review and Continual Improvement**

To promote continual improvement in the practice of *sustainable forestry* by conducting a management review and monitoring performance.

**Performance Measure 15.1**

*Program Participants* shall establish a management review system to examine findings and progress in implementing the *SFI 2015-2019 Forest Management Standard*, to make appropriate improvements in *programs*, and to inform their employees of changes.

Indicators:

15.1.1 System to review commitments, *programs* and procedures to evaluate effectiveness.

- N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: All forests conduct and document regular logging inspections & seedling survival/regeneration counts. See field notes. Monitoring of ESA restoration projects by Natural Heritage Commission.

Interdisciplinary Teams conduct Annual Work Plan reviews for all projects. See field notes.

15.1.2 System for collecting, reviewing, and reporting information to management regarding progress in achieving *SFI 2015-2019 Forest Management Standard objectives and performance measures*.

- N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Interviews confirmed that each area participated in the internal audits and Annapolis Director/State Forester and Associate Director have oversight and input into management system along with the state forester conducting the internal audits (April 27, June 15-17, 2021). Internal Review-ISA-2021 reviewed.

15.1.3 Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the *SFI 2015-2019 Forest Management Standard*.

- N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Interviews confirmed that each area participated in the internal audits and Annapolis Director/State Forester and Associate Director have oversight and input into management system along with the state forester conducting the internal audits (April 27, June 15-17, 2021). The "State Forest Managers Meeting" occurs annually and is attended by the leadership team, central office staff, district foresters, and state forester managers includes topics comprising the management review.

(End SFI Forest Management Checklist)



Appendix 4

# Checklist for SFI® Section 9, Appendix 1: Audits of Multi-Site Organizations

0Y301 – Maryland DNR Forest Service

Date of audit(s): April 2-5, 2019

## 3 Terms and Definitions

- 3.1 **Organization:** The term organization is used to designate any company or other organization owning a management system subject to audit and certification.
- 3.2 **Site:** A site is a permanent location where an organization carries out work or a service.
- 3.3 **Multi-Site Organization:** An organization having an identified central function (hereafter referred to as a central office – but not necessarily the headquarters of the organization) at which certain activities are planned, controlled or managed and a network of local offices or branches (sites) at which such activities are fully or partially carried out.
- 3.4 **Group Certification Organization:** A specific type of multi-site organization where forest owners, forest owners’ organizations, forest managers, forest products manufacturers or forest products distributors without a pre-existing legal or contractual link can form a group for the purposes of achieving certification and gaining eligibility for a sampling approach to certification audits.

For audits of conformance with SFI Section 4 in the SFI 2015-2019 Standards and Rules document, multi-site organizations using either IAF-MD1 or alternate approaches to sampling shall ensure that all the relevant sites (including the central function) are subject to the organization’s internal audit program and shall have been audited in accordance with that program prior to the certification body starting its assessment. (Section 9, Requirement 4.1.5 Audit Procedures)

**Note:** Communicate with NSF Project Manager to confirm.

- N/A     
  Conforms     
  Exceeds     
  O.F.I.     
  Minor NC     
  Major NC

Notes: Internal audit checklist and management review provided by MD DNR.

## 4.1 Eligibility Criteria / Method of Sampling (choose 1)

- Eligibility criteria established in IAF-MD1: **Use Sub-Checklist 9-1-A** below.
- Alternative Approaches to sampling provided for in Section 9, Subsection 5.2 of the Audit Procedures and Auditor Qualifications and Accreditation document: **Use Sub-Checklist 9-1-B** below.

**Sub-Checklist 9-1-A: Eligibility Criteria Established in IAF-MD1**

**Applicable**       **Not Applicable**

4.1.1 Multi-site organizations using IAF-MD1 as the basis for sampling shall meet the eligibility criteria established in IAF-MD1, including, but not limited to, the following:

a. The processes at all sites have to be substantially of the same kind and have to be operated to similar methods and procedures.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Individual field sites, MD DNR performs similar methods and procedures for forest management, wildlife management, and recreation.

b. The organization’s management system shall be under a centrally controlled and administered plan and be subject to central management review and all relative sites (including the central administration function) shall be subject to the organization’s internal audit program.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Forest management system is overseen by the state forester located at Maryland DNR Forest Service offices at 580 Taylor Avenue, Annapolis, MD. Interviews confirmed that each area participated in the internal audits and Annapolis Director/State Forester and Associate Director have oversight and input into management system.

c. It shall be demonstrated that the central office of the organization has established a management system in accordance with the SFI 2015-2019 Standards and that the whole organization meets the requirements of the standard.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Interviews confirmed that each area participated in the internal audits and Annapolis Director/State Forester and Associate Director have oversight and input into management system along with the state forester conducting the internal audits April 27, June 15-17, 2021.

d. The organization should demonstrate its ability to collect and analyze data (including, but not limited to, the items listed below) from all sites including the central office and its authority and also demonstrate its authority and ability to initiate organizational change if required:

- i. System documentation and system changes;
- ii. Management review;
- iii. Complaints;
- iv. Evaluation of corrective actions;
- v. Internal audit planning and evaluation of the results;
- vi. Changes to aspects and associated impacts for environmental management systems and
- vii. Different legal requirements.

N/A       Conforms       Exceeds       O.F.I.       Minor NC       Major NC

Notes: Internal audits April 27, June 15-17, 2021 conducted and no outcomes noted for corrective actions. Confirmed through interviews that if different legal requirements are changed Annapolis Director/State Forester and Associate Director have oversight and input in communicating to the foresters. Complaints are dealt with internally and confirmed there haven’t been any reported externally to the MD-DEL SIC in 3-5 years.

There was a non-conformance identified that covers clause d.i: System documentation. This is a Major CAR, as it is a repeated issue from a few years ago:

**Major NC:** Templates used for Harvests are maintained by the Central Office – multiple templates available for download contained errors or omissions.

**Types of contractual documents for harvests.** Of the list of types of contract templates below, 3 of the 13 available templates, those with asterisks and bolded, were found to have problems/omissions:

- 352B - Invitation to bid
- Contracts
  - **310** – Sales under 5k, \*\*
  - **352** – Sales under 5k, Lump Sum \*\*
  - 352-BL - Sales over 5k, Block

- 
- 352LS – Sales over 5k, One Step Method
  - **352N** – Sales over 5k and less than 50k
  - 352WT - Sales over 5k, Weight
  - 352 – Sales over 5k, Lump Sum
  - Amendment to Extend
  - 352F - Amendment to allow harvesting of additional timber
  - 352D – Special Conditions
  - **402** – Amendment to Extend Completion Date \*\*
  - 405G – Gatewood Agreement

Specific Issues found:

- The link for “**352** – Sales under 5k, Lump Sum \*\*\*” downloads the incorrect template

Verbal discussion with Jack Perdue confirms that this template needs to be removed from the website.

- One required template is missing from the list – one version of template does not have the corresponding “Certification template” – non-cert version is: DNR/FS-**402** version 05/29/2015
- **DNR/FS-310** – there is no master logger clause
- **DNR/FS-352N** – Clause 22: Chain of Custody – states an incorrect SFI cert code and notes that that the claim is harvested material is “FSC 100%”, nullifying the SFI claim.

---

(END Sub-Checklist 9-1-A: Eligibility Criteria Established in IAF-MD1)


### Sub-Checklist 9-1-B: Alternative Approaches to Sampling from Section 9, 5.2




**Applicable**       **Not Applicable**

(END Sub-Checklist 9-1-B: Eligibility Criteria Established in IAF-MD1)

Appendix 5

## Site Visit Notes



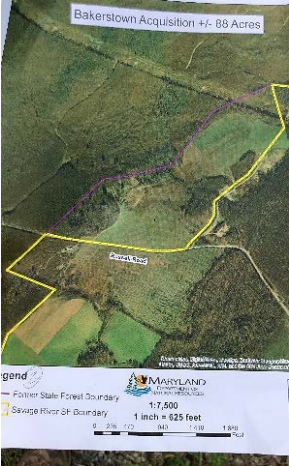
20 July 2021 - Potomac-Garret State Forest (PGSF)	
FMU/locations	Activities/ notes
7:00 AM	Leave for PGSF from Grantsville lodging.
8 AM PGSF office	<p>Opening Meeting:</p> <ul style="list-style-type: none"> <li>• Introductions</li> <li>• Client update</li> <li>• Review scope of evaluation</li> <li>• Audit plan</li> <li>• Intro/update to standards</li> <li>• Confidentiality and public summary</li> <li>• Conformance evaluation methods and tools</li> <li>• Review of open CARs/OBS</li> <li>• Emergency and security procedures for evaluation team</li> <li>• Adjustments and audit route review</li> </ul>
PGSF office	Confirm field staff have access to online forestry data for critical forestry activities
<p>Documents provided for all harvest sites visited:</p> <ol style="list-style-type: none"> <li>1. Invitation to Bid</li> <li>2. Environmental Assessment Summary</li> <li>3. Aerial and Topographic photos in Avenza, georeferenced PDF maps</li> <li>4. Signed Timber sale contracts with Attachments, Amendments, Extensions</li> <li>5. Harvest inspections</li> </ol> <p>Roads and landings for all sales selected by MDDNR staff.</p>	
 <p><i>Thinning with multi-level canopy retained.</i></p>	<ol style="list-style-type: none"> <li>1. PG-01-20 – Maple Glade Thinning in goshawk ESA Truck landing parallel the road. Prior landing was used in 1997. No issues with logger. Was on-site for a few weeks. No CoC, once tree is cut, it becomes the owner’s property. Skid trails blocked to reduce illegal access to the SF, to prohibit vehicle access. Goshawk harvest timing restriction would be implemented, if hawk was present, with no harvest allowed until young birds fledged; no active nest at the time of harvest. Special conditions noted in plan. BMP guidelines for goshawk were reviewed from other states and wildlife bio was consulted to determine the seasonal closures that would occur. Cut was completed leaving hawk perch sites at multiple levels of the canopy.</li> </ol>
	<ol style="list-style-type: none"> <li>2. PG-03-19 Stand 23-6 Regeneration Harvest - adjacent to ESA. Discussion of Goshawk ESA and HCVF. Small clearcut, roadside. Green tree retention and snags observed. Roadside landing. Site closed 7/28/2020, no issues. HCV for One trail that had some rutting, viewed fixed site. Hardwood regeneration, plots for regen will be done at year 5, after growing season. High top restriction to protect regen. Must cut at 8’ and leave.</li> </ol>

	<p>3. Compartment 42, Stand 8, FY18 – Off Maple Grade Road. Sprayed site - Ground cover was machine mist blown with oust mix, and hack &amp; squirt with Garlon 4a for larger mid-story stems, approx. 35 acres. Success was not as expected, as regen did not respond and the point was to establish regen. Will revisit the site over the next year and check growth, before deciding the next activity for the site.</p>
	<p>4. Deer exclosure, completed in 2012, due to be removed in the next year, as goal was achieved and regeneration has reached significant height.</p>
	<p>5. Wildlife enhancement project - Piney Mountain  Management completed In-house. Previous owners of property were a hunt club that never implemented the planned regular maintenance. Past activity included a variable retention project, that was more like a high-grade cut, therefore much UGS was present.  Early successional habitat being enhanced and maintained. No water on site. Cleared out the white birch, area to be mowed bi-annually. Need to bring soil back in and spread with a dozer, then plant ground cover/ grasses. Native shrubs planted inside fencing and hemlock pockets protected and cleared around. Wildlife species that will benefit include: grouse, bear, neotropical migrant birds, pollinators. Monitoring is primarily with photo documentation.  Red spruce planting on approx. 6-7 acres. 500 seedlings from West Virginia Highland Conservancy planted by DNR staff. Once winter hits, will come back to check mortality of seedlings.</p>

*Herbicide treatment.*

*Fence for deer exclosure.*

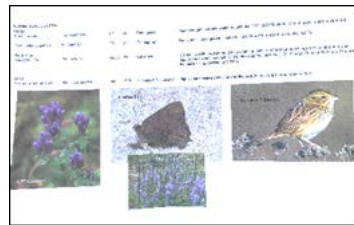
*Piney Mountain early successional habitat creation.*

Wednesday, 21 July 2021 – Savage River State Forest (SRSF)	
8 AM	Abbreviated open meeting, Audit route review
Office team	MM at office for contract documents review
<p>Documents provided for all harvest sites visited:</p> <ol style="list-style-type: none"> <li>1. Invitation to Bid</li> <li>2. Environmental Assessment Summary</li> <li>3. Aerial and Topographic photos in Avenza, georeferenced PDF maps</li> <li>4. Signed Timber sale contracts with Attachments, Amendments, Extensions</li> <li>5. Harvest inspections</li> </ol> <p>Roads and landings for all sales selected by MDDNR staff.</p>	
 <p><i>Hemlock with Hemlock Woolly Adelgid (HWA).</i></p>  <p><i>Tree marked after HWA treatment.</i></p>	<ol style="list-style-type: none"> <li>1. Wolf Swamp ESA (HCV)- Meet with Maryland Dept. of Agriculture and Wildlife &amp; Heritage Service (WHS) representatives at Wolf Swamp ESA to discuss hemlock treatment and hemlock management projects. Team targets areas heavy to hemlock. Mixed stands with over 80% hemlock. Objective is to maintain hemlock by treating hemlock woolly adelgid (HWA). Project started 2011-2012. Some soil and some by branch injections. Each tree is tagged. Protected HCV – discussion about species of interest. WHS representative presented information sheets regarding RTE and protection measures.</li> </ol>
 <p><i>Aerial photo printout of Bakerstown property acquisition.</i></p>	<ol style="list-style-type: none"> <li>2. Russell Road, Bakerstown acquisition (HCV). Discussions RE: management goals for the Frosted Elfin butterfly and Henslow’s sparrow by WHS representative, Project Open Space – with Land Acquisition and Planning. DNR does initial site visit using cross-disciplinary form for assessing properties. Issues are identified (examples, junk piles, dilapidated house, etc.) which gets put into a contract. This site has restoration goals that complement existing values in the area. For example, plans to plant seeds of host plant species, mowing, and planning possible Rx burns.</li> </ol>

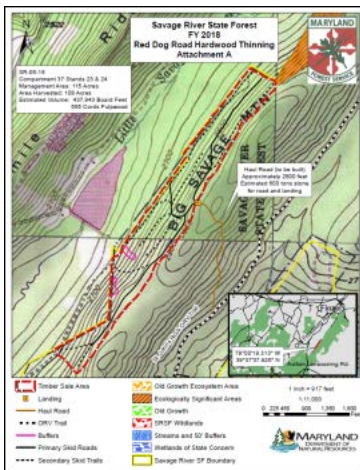




Acquisition - field to be restored to meadow conditions.



Information sheet HCVs in general area.



Map of active harvest site, SR-06-18.

3. SR-06-18 Red Dog Road Hardwood Thinning (Active) Glotfelty Lumber Co. (Stands 23 & 24 Compartment 37). Hardwood thinning harvest, 108 acres. The harvest borders on state forest boundary. Access to the sale will off St. John's Rock ORV Trail (formerly known as Red Dog Road). Boundary marked red paint, pink flagging. Marked red paint on stems to keep.

Harvest includes slopes greater than 15%. All appropriate BMPs implemented to prevent excessive soil loss from the harvest site. The sediment and erosion control permit from Department of the Environment. There was a temporary disruption of the use of this area by recreationists during the harvest duration. Sections of both the St. John's Rock ORV Trail and Big Savage Mountain Hiking Trail were posted with signs warning of the logging activity while the job is active. Standard Erosion & Sediment Control Plan Requirements (Plan and costs).

Logger interview, 4-man operations, machine feller, forwarders & 2 loaders, 3 trucks. Safe operations, PPE, spill kit on-site, 1<sup>st</sup> aid kit, fire extinguishers in machines, map and contract on-site. Daily safety meetings, internal OSHA review within last 3 years, logger completed OSHA program and does refresher classes. Logger planning now for SDS reviews every 6 months. Emergency communications and planning reviewed. Completed OSHA inspections in the past. Logger verified MD Master Logger certified.



Landing w/ loaders, leading into thinning harvest.

	<p>4. SR-01-20 Bowman Hill North Hardwood Thinning (Active) Cessna Brothers Lumber          Boundaries red paint, pink flagging. Gated access. Stems marked blue to cut and red to keep. Some depth to tracks along main skid trail to be recovered following harvest.          Active harvest, Logger interview, 4-man operation, not all equipment on-site, self-stop after rainy conditions on rocky soils. PPE, spill kit on-site, 1st aid kit, fire extinguishers in machines, map and contract on-site. Logger verified MD Master Logger certified.</p>
<p><i>Tree marked in blue to cut.</i></p>	
	<p>5. SR-05-19 Bowman Hill North Pine Regeneration (Closed Out). Compartment 10, Stands 19 &amp; 20. Harvest all red and white pine. 3.5 acre. Pine regeneration harvest removing undesirable and over mature trees. Thinning to release advanced regeneration present &amp; encourage additional desired regeneration establishing in the understory. No Whole Tree Skidding to prevent excessive damage to site and leave trees. Haul and skid road locations, centerlines, and construction specifications as specified by State Forest Personnel. All tops and other debris kept out of buffer areas and retained within sale boundaries. All large debris must be kept back a minimum of 50 Ft. of the traveled portions of roadways. All unstable material (exposed soil) resulting from road construction or landings with outslopes greater than 30% must be stabilized to the satisfaction of State Forest Personnel</p>
<p><i>Aerial photo showing pine harvest areas outlined in blue.</i></p>	
<p>SRSF Office – GIS review</p>	<p>Review of forester access to online resources including soils, RTE, HCV (OGEMA) information.</p>
<p>SRSF Office – Chemical storage</p>	<p>Inspection of chemical storage shed. Only non-HHP chemicals. Labels current and all present for chemicals being used by forest. Verified licensing information. Examination of chemical inventory sheets/system. Interviews with applicators.</p>

Thursday, 22 July - Savage River State Forest (SRSF) Office	
	<p>1. SR-05-20 Keyser's Ridge Hardwood Regeneration. Compartment 1 Stands 24 &amp; 26. Sold to Joe Colmer Logging, sold February 2019. Hardwood regeneration harvest, 34-acre site contains maturing northern hardwood stand about 98 years old with average merchantable dbh of 17.7". A breakdown of the stand BA is about 61 ft<sup>2</sup> of acceptable growing stock with the remaining 90 ft<sup>2</sup> recently dead trees and trees of poor form / quality. State Forest records show this stand was last thinned in 1973. The adjacent stand to the northeast was regenerated in 2005.</p> <p>Resulting stand looks like a mix of a crop tree harvest to regeneration cut, due to the varying pockets of overmature cherry that was present. All material was skidded uphill to the top of the stand. Used the SF parking area as the landing, as it was historically a harvest landing for the state, at the end of a State Forest Road.</p> <p>Herbicide treatments done in 2017 and 2018. In July / August 2017 the stand was foliar sprayed to treat ferns and grasses found to be exceptionally dense on the forest floor. In July / August 2018 the stand received cut-stump herbicide treatment of all undesirable understory stems (0.5-6") found to be limiting regeneration.</p> <p>Interview stakeholder, conservation expert, ENGO: OGEMA/HCV nomination and review procedures, collaborative projects.</p>
	<p>2. SR-02-20. Spruce thinning, Glotfelty Logging. Good clean cut, all stems skidded to the same landing as SR-05-20, to the top of the hill in the corner of sale. Used the SF parking area as the landing, as it was historically a harvest landing for the state. No residual stand damage observed on any retained trees.</p>
	<p>3. SR-04-19/SR-04-20 Jacob Yoder Firewood Salvage I &amp; III (Inactive). DNR works with neighbor to set up small, discrete firewood harvest jobs. Last harvest area was inspected from prior year. Forester marks trees to cut, inspected old and new stump and current stand.</p>
	<p>4. SR-04-21 Jacob Yoder Thinning. Additional adjacent sale was marked to cut as a thinning (recently contracted sale, not yet cut), with removal of selected hardwood stems</p>
<p>10:30 AM SRSF Office</p>	<p>Stakeholder interviews</p>
<p>SRSF Office</p>	<p>Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm evaluation findings.</p>
<p>2:00 PM</p>	<p>Closing Meeting: Brief summary of audit activities, present preliminary findings, confidentiality, SCS/FSC dispute policy, timeline for report, and discuss next steps.</p>

Appendix 6

## Meeting Attendance

### Opening Meeting – Tuesday July 20, 2021

Maryland Forest Service Certification Audit 2021  
Potomac-Garrett State Forest  
Forest July 20, 2021  
Sign in Sheet

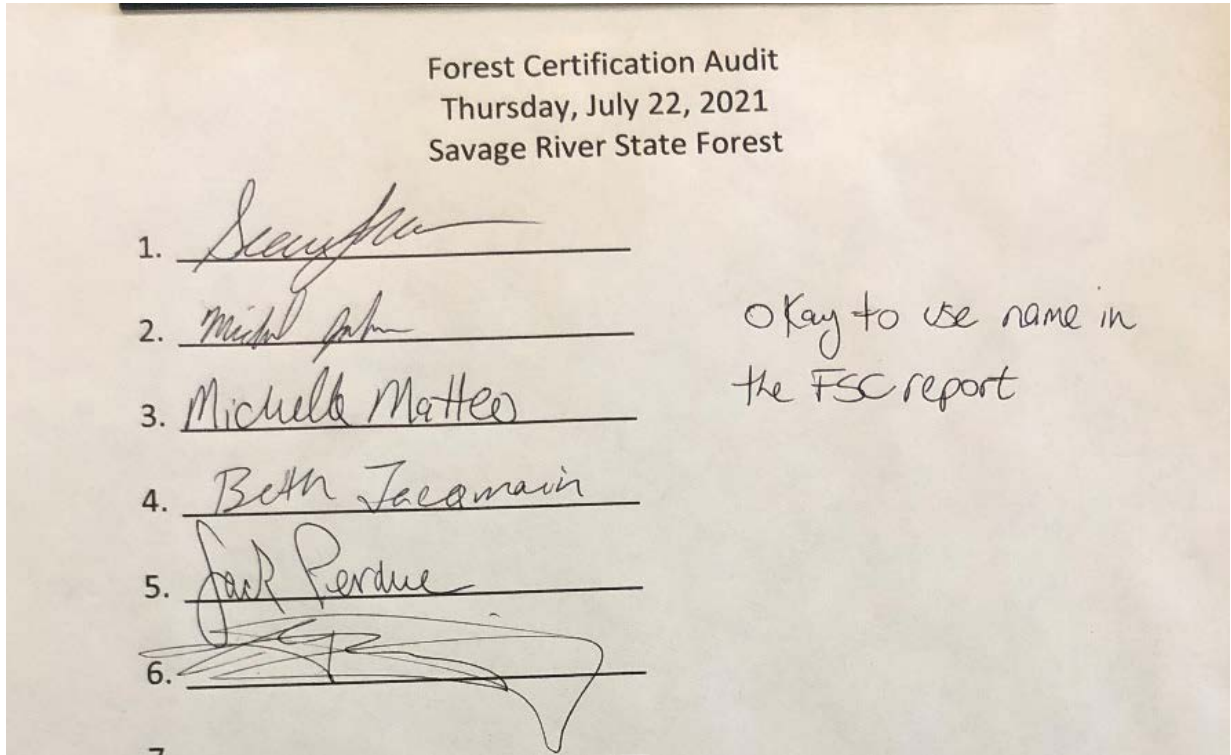
Name	Affiliation	Email
George Eberling	MFS Regional <sup>to Net</sup>	george.eberling@maryland.gov
Noah Rowe	MFS - Assistant Manager <sup>PSTF</sup>	noah.rowe@maryland.gov
SEAN NOLAN	MFS - MANAGER SESF	sean.nolan@maryland.gov
Scott Campbell	MFS - Manager PGF	scott.campbell@maryland.gov
Kenneth Jolly	MFS	Kenneth.jolly@maryland.gov
Jack Perdue	MFS - Manager <sup>MDNR Program = Forest Resource Planning</sup>	jack.perdue@maryland.gov
Michelle Matteo	NSF Auditor	
Beth Jacomini	PSCA Auditor	bjacomin@scsglobal.com

Forest Certification Audit  
Wednesday, July 21, 2021  
Savage River State Forest

1. Scott J. Howell
2. Devin Ho
3. Michelle Ho
4. ~~\_\_\_\_\_~~
5. Paul R. [unclear]
6. Beck [unclear]
7. Michelle Matteo
8. Kenneth Tolly
9. \_\_\_\_\_

OK to use  
names in FSC  
report.

Closing Meeting - Thursday July 22, 2021





Appendix 7

Forestry Program COVID-19 Report Appendix

Client Name: Maryland DNR Forest Service

FRS: 0Y301

Is this a fully remote special audit? YES NO Justification: Audit was completed with pre-audit document review and some interviews completed remotely; field portion was on-site.

Is a remote special audit for certificate extension needed? YES NO Justification:

Approximate date of the future on-site special surveillance or re-evaluation audit to be completed within the allowed extension period. N/A

Was this remote audit able to be effectively completed using remote audit methods? YES NO If no, why? State reason if "no" is selected: Partial remote audit was effective.

Are there specific portions of the audit that could not be effectively evaluated? YES NO Portion of the audit that could not be audited: n/a

Are there follow-up items needed from the remote event? YES NO Does additional time need be added to the next audit based on these follow-up items? State follow-up items needed if "yes" is selected:

Are there follow-up items needed from the remote event? YES NO Does additional time need be added to the next audit based on these follow-up items? State reason for and amount of additional time:

Table with 3 columns: Remote audit methods used, Remote method/tool, Used for. Rows include Document review, Google Drive, and Records review, File transfer technology.



---

**Additional questions**

When is it expected that the organization will be able to function normally?

Organization is back to normal operations.

---

Is the organization able to ship products or perform the service defined within the current scope of certification? If not, when is it expected to be able to do so?

N/A

---

Does the organization need to use alternative manufacturing and/or distribution sites? If so, are these currently covered under the current certification or will they need to be evaluated?

N/A

---

Will some of the processes and/or services performed or products shipped be subcontracted to other organizations? If so, how will the other organizations' activities be controlled by the certified organization?

N/A

---

To what extent has operation of the management system been affected?

Operations of the management system have not been affected.

---

Has the certified organization conducted an impact assessment regarding COVID-19?

Impact assessment has been conducted. Some staff employees are working from both home and office.

---