Maryland DNR Forest Service
SFI Summary Surveillance Audit Report for 2015

The SFI Program of the Maryland DNR Forest Service of Annapolis, Maryland has achieved continuing conformance with the SFI Standard®, 2010-2014 Edition, according to the NSF-ISR SFIS Certification Audit Process.

The Maryland DNR Forest Service initially obtained SFI Certification from NSF-ISR on July 24, 2003 (NSF-ISR initially certified the Chesapeake Forest in 2003, with two significant scope expansions since) 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 within the expanded scope based on an audit of the six largest state forests against the SFI 2010-2014 Standard. Surveillance audits were conducted in 2012 and 2013.

The state forests included in the current scope were re-certified to the SFIS in April of 2014. This report describes the results of the 2015 Surveillance Audit designed to focus on changes in operations, the management review system, and efforts at continuous improvement. A subset of the SFI 2010-2014 requirements were selected for detailed review. In addition all of the new requirements of the SFI 2015-2019 Standards were reviewed to ensure that the organization is prepared to meet them by the deadline of December 31, 2015.

Maryland's State Forests

Maryland DNR Forest Service is responsible for the management of the 215,607 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 Draft Management Plan:
'The resources and values provided from state forests reach people throughout the State and beyond. These resources and values range from economic to aesthetic and from scientific to 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)'*

SFI 2010-2014 Standard Scope

Scope Statement: 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. The SFI Certificate Number is NSF-SFIS-0Y301.

The audit was performed by NSF-ISR on April 6-10, 2015 by an audit team headed by Michael Ferrucci, Lead Auditor supported by Kyle Meister, Team Auditor. Audit team members fulfill the qualification criteria for conducting SFIS Certification Audits of "Section 9. SFI 2010-2014 Audit Procedures and Auditor Qualifications and Accreditation" contained in Requirements for the SFI 2010-2014 Program: Standards, Rules for Label Use, Procedures, and Guidance.

The scope of the SFIS Audit included land management requirements and general requirements; there are no milling or mill procurement operations. Land management and forestry practices that were the focus of field inspections included those that have been under active management over the planning period of the past year. Practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example). In addition, SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were within the scope of the audit.

SFI Objectives relating to procurement and other 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 2.1.4: Minimized plantings of exotic tree species.
- Indicator 2.1.7: Afforestation programs that consider potential ecological impacts of the selection and planting of tree species in non-forested landscapes.
- Performance Measure 2.5: Program Participants that deploy improved planting stock, including varietal seedlings, shall use sound scientific methods.
- Objective 8. Landowner Outreach: To broaden the practice of sustainable forestry by forest landowners through fiber sourcing programs.
- Objective 9. Use of Qualified Resource and Qualified Logging Professionals: To broaden the practice of sustainable forestry by encouraging forest landowners to utilize the services of forest management and harvesting professionals.

- Objective 10. Adherence to Best Management Practices: To broaden the practice of sustainable forestry through the use of best management practices to protect water quality.

- Objective 11. Promote Conservation of Biological Diversity, Biodiversity Hotspots and High-Biodiversity Wilderness Areas: To broaden the practice of sustainable forestry by conserving biological diversity, biodiversity hotspots and high-biodiversity wilderness areas.

- Objective 12. Avoidance of Controversial Sources including Illegal Logging: To broaden the practice of sustainable forestry by avoidance of illegal logging.

- Objective 13. Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws: To broaden the practice of sustainable forestry by avoiding controversial sources.

- Indicator 15.1.2: Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols.

SFIS Audit Process

The objective of the audit was to assess continuing conformance of the firm's SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2010-2014 Edition and to assess readiness to meet the full set of requirements of the SFI 2015-2019 Standards.

NSF-ISR initiated the SFIS 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 SFIS Certification Audit, and to prepare a detailed audit plan. NSF then conducted the SFIS Certification Audit of conformance to the SFI 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 2010-2014 Sustainable Forestry Initiative Standard ®. The next Surveillance Audit is scheduled for May 2015.

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable SFI 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-ISR reviewed a sample of the written documentation assembled to provide objective evidence of SFIS Conformance. NSF-ISR 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-ISR SFI-SOP. NSF-ISR also 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 possible findings of the audit included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, Practices that exceeded the Basic Requirements of the SFIS, and Transitional Non-conformance.

Overview of Audit Findings

Maryland's SFI Program demonstrated substantial conformance against the 2010-2014 SFI Standard. There were two non-conformances, and three "Opportunities for Improvement". The program has continued to exceed the standard in several areas. As such, the program has earned recertification. The program was also found to meet all of the new indicators of the new SFI 2015-2019 Standards except one. Details for the evaluation against both versions of the SFI Standard are provided below.

2010-2014 SFI Standard

Two non-conformances were identified in the 2015 audit.

> Indicator 2.3.6 requires "Road construction and skidding layout to *minimize* impacts to soil *productivity*.
>
> Minor Non-conformance: Administrative challenges continue to delay the implementation of necessary road repairs and upgrades.
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> Indicator 2.4.2 requires "Management to promote healthy and productive forest conditions to *minimize* susceptibility to damaging agents."
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> Minor Non-conformance: Management on the Savage River State Forest (SRSF) does not fully meet the requirement to promote healthy and productive forest conditions to *minimize* susceptibility to damaging agents. At SRSF many stands are stressed and/or overstocked; regeneration problems are apparent, with silvicultural analyses and silvicultural prescriptions developed through SILVAH-Oak indicating the need for treatments.

Three opportunities for improvement (OFIs) were identified in the 2015 audit:

> Indicator 2.2.6. Requires the "Use of management practices appropriate to the situation, for example: d. designation of streamside and other needed buffer strips…" when applying herbicides. There is an Opportunity for Improvement in the implementation of the herbicide application program on the eastern forests to ensure that contractors implement the spray plan correctly.
> Additional Notes: On the Wango Pines herbicide project the aerial spray contractor neglected to avoid a clearly-designated "no spray" buffer around a cluster of plant species (horse sugar and sheep laurel) that are on the watch list. The needed buffer was clearly identified on the project map and had been discussed with the forester in charge, but apparently the pilot forgot about this sensitive site (others sensitive areas were avoided).

Protocols for future aerial herbicide application projects have been modified to require an on-site briefing just prior to application to remind the pilot of the sensitive areas.

Indicator 4.1.8. requires organizations to "Consider the role of natural disturbances, including the use of prescribed or natural fire where appropriate…" There is an Opportunity for Improvement regarding timely implementation of critical prescribed fire projects.

Indicator 15.1.1 requires a "System to review commitments, programs and procedures to evaluate effectiveness." There is an Opportunity for Improvement in the consistency and clarity of information in management reports (also provided to public on web sites) providing activity results (acres treated, etc.) in relation to plans.

There were four areas where the finding was "Exceeds the Requirements":

The MD DNR program exceeds the requirements for promoting conservation of native biological diversity.
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.

The MD DNR program exceeds the requirements for retaining stand-level wildlife habitat elements.
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.

The MD DNR program exceeds the requirements for providing an exceptional range of high-quality recreational opportunities State Forests.
5.4.1. Provide recreational opportunities for the public, where consistent with forest management objectives.

The MD DNR's use of information and expert advice or stakeholder consultation in the identification special sites for protection exceeds the requirements for this indicator.
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.

Transitional Non-conformances against SFI 2015-2019 Forest Management Standard

Transitional Minor Non-conformance: There is not a written policy acknowledging a commitment to recognize and respect the rights of Indigenous Peoples. This is a new requirement, and as such the Maryland Forest Service has until December 31, 2015 to address this gap.
Indicator 8.1.1 requires organizations that "Program Participants will provide a written policy acknowledging a commitment to recognize and respect the rights of Indigenous Peoples."

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General Description of Evidence of Conformity

NSF's audit team used a variety of evidence to determine conformance. A general description of this evidence is provided below, organized by SFI Objective.

Objective 1. Forest Management Planning - To broaden the implementation of sustainable forestry by ensuring long-term forest productivity and yield based on the use of the best scientific information available.

Summary of Evidence – The forest management plans for each state forest and supporting documentation and the associated inventory data and growth models were the key evidence of conformance. The plans for all six of the forests involved (four plans cover the six forests) were key to this finding.

Objective 2. Forest Productivity - To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, soil conservation, afforestation and other measures.

Summary of Evidence – Field observations and associated records 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. Special recreation-oriented grants allow for some road maintenance work, further supporting conformance.

Objective 3. Protection and Maintenance of Water Resources - To protect water quality in streams, lakes and other water bodies.

Summary of Evidence – Field observations of a range of sites were the key evidence. Auditors visited the portions of many field sites that were closest to water resources.

Objective 4. Conservation of Biological Diversity including Forests with Exceptional Conservation Value 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 habitat diversity and the conservation of forest plants and animals, including aquatic species.

Summary of Evidence – Field observations, written plans and policies for the protection of old growth, High Conservation Value Forests, and representative sample areas were the key evidence used to assess the requirements involved biodiversity conservation. This was supported by the extensive use of college-trained field biologists.

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 – Field observations of completed operations and policies/procedures for visual quality were assessed during the evaluation. Further maps and descriptions of recreation sites, combined with selected field visits helped confirm a strong recreation program. Stakeholder contacts supported the DNR's statements regarding efforts to balance recreational use and environmental protections.

Objective 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.

Summary of Evidence – Field observations of completed operations, GIS maps and other records of special sites, training records, and written protection plans were all assessed during the evaluation.

Objective 7. Efficient Use of Forest Resources - To promote the efficient use of forest resources.

Summary of Evidence – Field observations of completed operations, contract clauses, and discussions with supervising field foresters and with loggers provided the key evidence. The Maryland Forest Service is working to improve markets for forest products, particularly markets related to bioenergy.

Objectives 8 through 13 are not applicable.

Objective 14. Legal and Regulatory Compliance -

Compliance with applicable federal, provincial, state and local laws and regulations.

Summary of Evidence – Interviews and a review of information on the internet helped confirm conformance. The program employs specialists to ensure that conservation laws are followed.

Objective 15. Forestry Research, Science, and Technology - To support forestry research, science, and technology, upon which sustainable forest management decisions are based.

Summary of Evidence – Discussions with stakeholders and support for research on state forest lands were the key evidence used.

Objective 16. Training and Education -To improve the implementation of sustainable forestry practices through appropriate training and education programs.

Summary of Evidence – Interviews, review of training records, and the records of support for the Maryland Master Logger Program were sufficient evidence for this objective.

Objective 17. Community Involvement in the Practice of Sustainable Forestry -

To broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment to sustainable forestry, and publicly report progress.

Summary of Evidence – Interviews with members of two of the citizens advisory groups, publications and the DNR website were used to confirm conformance with these requirements.

Objective 18: Public Land Management Responsibilities -

To support and implement sustainable forest management on public lands.

Summary of Evidence – The audit team reviewed written and on-line documentation of the extensive public involvement processes.

Objective 19. Communications and Public Reporting - To broaden the practice of sustainable forestry by documenting progress and opportunities for improvement.

Summary of Evidence – Reports filed with SFI Inc. and the SFI Inc. website provided the key evidence.

Objective 20. Management Review and Continual Improvement - To promote continual improvement in the practice of sustainable forestry, and to monitor, measure, and report performance in achieving the commitment to sustainable forestry.

Summary of Evidence – Records of program reviews, agendas and notes from management review meetings, and interviews with personnel from all involved levels in the organization were assessed.

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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 zones, and to conform with 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 forests and lands of special significance (ecologically, geologically or culturally important) in a manner that protects their integrity and 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. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing
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.

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

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

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

12. Public Involvement
To broaden the practice of sustainable forestry on public lands through community involvement.

13. Transparency
To broaden the understanding of forest certification to the SFI 2010-2014 Standard by documenting certification audits and making the findings publicly available.

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

Source: Sustainable Forestry Initiative® (SFI) Standard, 2010-2014 Edition

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