

## **2016 SFI Summary Surveillance Audit Report Brosnan Forest, owned by Norfolk Southern Railway Company**

The SFI Program of the Norfolk Southern Railway Company for the Brosnan Forest in Dorchester County, South Carolina has achieved continuing conformance with the SFI 2015-2019 Standard and Rules<sup>®</sup>, Section 2 – Forest Management, according to the NSF SFIS Certification Audit Process.

NSF initially certified to the Brosnan Forest to the SFIS on July 22, 2011 and recertified it in 2014. This report describes the second Surveillance Audit since recertification designed to focus on changes in the standard, changes in operations, the management review system, and efforts at continuous improvement. In addition, a subset of SFI requirements were selected for detailed review.

Brosnan Forest, owned by Norfolk Southern Railway Company and Southern Region Industrial Realty, Inc., is situated in Dorchester County, South Carolina. The property, comprised of 14,343 acres, is managed as a conference center and retreat, with a focus on hunting, fishing and other outdoor activities including environmental education and research. The buildings, associated building grounds, and recreation facilities including the lakes or ponds associated with the facilities are not included in the scope.

Four basic timber types exist on Brosnan Forest: uneven aged longleaf pine; uneven aged loblolly pine, and creek and bottomland hardwood. The longleaf pine forest and ecosystem has been retained in a longleaf forest averaging 110 years of age and is considered an outstanding example of long-term stewardship of this ecologically important forest type. This longleaf forest is home to approximately 87 Red Cockaded Woodpecker (RCW) groups, the largest known population of RCWs on a single private ownership. Longleaf pine is maintained by careful use of the Stoddard-Neel Method, a variant of uneven-aged silviculture which relies on prescribed fire, stocking control, and creation of small forest openings to nurture and enhance natural regeneration. Over time managers are expanding the area of longleaf pine on appropriate sites, while managing suitable sites for loblolly pine (more intensive) and valuable bottomland hardwood species such as cherrybark oak.

The Surveillance audit was performed by NSF on May 13, 2016 by Norman Boatwright, Lead Auditor. NSF auditors fulfill the qualification criteria for conducting SFIS Audits of “Section 9. SFI 2015-2019 Audit Procedures and Auditor Qualifications and Accreditation”.

The objective of the audit was to assess continued conformance of the firm’s SFI Program to the requirements of the Sustainable Forestry Initiative Standards and Rule<sup>®</sup>, Section 2. The scope of the SFIS Audit included fee timberland operations. Forest practices that were the focus of field inspections included those that have been conducted since the previous field audit conducted in May of 2015. 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 reexamined during the audit. Use of the SFI logo and the requirement to provide a public of audit reports were also reviewed.

As with the initial certification, several of the SFI Performance Measures were outside of the scope of the company’s SFI program and were excluded from the scope of the SFI Certification Audit as follows:

- The Company does not plant exotic species so Indicator 2.1.4 does not apply.
- The company does not have public land management responsibilities, so SFI Performance Measure 8.2 and Objective 13 are not applicable.
- There is no certified logger program in South Carolina so Indicator 11.2.3 does not apply.

### **SFIS Surveillance Audit Process**

The review was governed by a detailed audit protocol designed to enable the audit team determine conformance with the applicable SFI requirements. The process included the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices. Documents describing these activities were provided to the auditor in advance, and a sample of the available audit evidence was designated by the auditor for review.

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of SFIS 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 SFI-SOP. NSF also selected and interviewed stakeholders such as contract loggers, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented.

The possible findings for specific SFI requirements included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that Exceed the Basic Requirements of the SFIS. Surveillance Audits generally focus on conformance issues and do not generally address exceptional practices.

## Overview of Audit Findings

Brosnan Forest's SFI Program was found to be in conformance with the SFIS Standard. A minor non-conformance was identified:

CI 1.3.1 Forest lands converted to other land uses shall not be certified to this SFI Standard.

Finding: The Company has not backed out the acreage of the areas associated with the office, maintenance areas and the cabin areas from the scope.

A Recertification Audit is scheduled for May 12, 2017.

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

**Summary of Evidence** – The forest management plan (Forest and RCW Management Plan, Brosnan Forest, Dorchester County, S.C. Revised April 2016) and the associated supporting documentation including inventory data and growth models were the key evidence of conformance.

**Objective 2. Forest 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 were used to confirm practices. Brosnan Forest has programs for reforestation, for protection against common insects and diseases, for developing a forest that is resilient to wildfire, and for careful management of activities which could potentially impact soil and long-term productivity.

**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 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** – Field observations, written plans and policies, notably the Habitat Conservation Plan for the Red Cockaded Woodpecker, use of college-trained field biologists, significant involvement of specialists, and regular staff involvement in conferences and workshops that cover scientific advances were the evidence used to find outstanding results in the requirements involved biodiversity conservation.

**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 of recreation sites, combined with field visits, helped confirm a strong recreation program.

**Objective 7. Efficient Use of Forest Resources** - To minimize waste and ensure the efficient use of fiber resources.

**Summary of Evidence** – Field observations of completed operations, contract clauses, and discussions with supervising field foresters and with the logger used for all harvests provided the key evidence.

**Objective 8 - Recognize and Respect Indigenous Peoples' Rights** - To recognize and respect Indigenous Peoples' rights and traditional knowledge.

**Summary of Evidence:** The written policy and fact that there are no federally listed indigenous peoples in the Company's area provided the key evidence.

**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** – In kind support of research was confirmed by interviews and includes providing lodging, meals, equipment and transportation for RWC and deer population studies.

**Objective 11. Training and Education** - To improve the implementation of sustainable forestry practices through appropriate training and education programs.

**Summary of Evidence** – On-line listing of trained loggers, records associated with harvest sites audited, and stakeholder interviews were the key evidence for this objective.

**Objective 12. Community Involvement in the Practice of Sustainable Forestry** - 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** – Records of financial support and evidence of many types of outreach and forestry education were sufficient to assess the requirements.

**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.

**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** – Records of program reviews and from management review meetings were assessed, and staff was interviewed to confirm the requirements are met.

## **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, 2015-2019 Edition*

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