



2014 SFI Summary Recertification 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 Standard®, 2010-2014 Edition, according to the NSF-ISR SFIS Certification Audit Process.

NSF-ISR initially certified to the Brosnan Forest to the SFIS on July 22, 2011. This report describes the first Recertification Audit 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 14,405 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 85 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 recertification audit was performed by NSF-ISR on May 15, 2014 by Norman Boatwright, Lead Auditor. NSF auditors 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 objective of the audit was to assess continued conformance of the firm’s SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2010-2014 Edition. 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 2013. 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.
- Because riparian protection standards (BMPs) have been published in South Carolina, Indicator 3.2.5 does not apply.
- The company does not procure any wood from outside landowners or wood producers to supply any manufacturing facilities. As such, Objectives 8, 9 and 10 of the SFI Standard are not applicable.
- Also, as Brosnan Forest does not procure any wood from outside of North America Objectives 11, 12, and 13 do not apply.
- The company does not have public land management responsibilities, so SFI Objective 18 is not applicable.

SFIS Recertification 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-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 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 full conformance with the SFIS Standard. No non-conformances or opportunities for improvement were identified this year or last year.

Exceptional Practices:

4.1 Program Participants shall have programs to promote biological diversity at stand- and landscape-levels.

Brosnan Forest has devised programs to promote biological diversity at stand-and landscape-levels. Two contract foresters are fully certified in RCW management and well versed in RCW habitat guidelines, and many other specialists are used in the program to ensure strong biodiversity protections.

Brosnan Forest fosters and protects approximately 94 Red-Cockaded Woodpecker Clusters, with approximately 85 clusters being active and providing this property with distinction of having the largest known population of the endangered Red Cockaded Woodpecker. Brosnan Forest also protects its Red-Cockaded Woodpeckers with a Forest Conservation Easement and a RCW Safe Harbor Agreement. This

is also the most researched population of RCWs on private property with USFWS and Clemson graduate students researching reproductive biology of these clusters.

Brosnan Forest demonstrates support of and participation in plans or programs for the conservation of old-growth forests on its ownership. Longleaf pine stands on Brosnan Forest occupy approximately 6,200 acres with an average age of 110 years.

Brosnan Forest encourages the longleaf fire maintained ecosystem with prescribed fire at intervals of 2 and 4 years that has maintained ideal Red-Cockaded Woodpecker habitat, and to successfully regenerate native wiregrass – an important understory component of the historical longleaf pine ecosystem.

4.2 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.

Brosnan Forest has implemented a superb program to promote biological diversity at stand-and landscape-levels. The program is run by 2 wildlife biologists, two contract foresters that are fully certified in RCW management and well versed in RCW habitat guidelines, research ecologist and plant ecologist contractors and many other specialists are involved in the program ensuring strong biodiversity protections.

15.1 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.....

Brosnan Forest provides financial and/or in-kind support for RCW, Deer and prescribed burn research and to the Longleaf Alliance.

A Surveillance Audit is scheduled for May 14, 2015.

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 plan (Forest and RCW Management Plan, Brosnan Forest, Dorchester County, S.C. Revised December 2010) 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, soil conservation, afforestation and other measures.

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 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. Auditor visited the portions of field sites that were closest to water resources. Efforts to restore bottomland hardwood stands with supplemental planting were also assessed.

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, 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 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, records of special sites particularly Red Cockaded Woodpecker nest trees and colonies, 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 the logger used for all harvests provided the key evidence.

Objective 14. Legal and Regulatory Compliance -

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

Summary of Evidence – Field reviews of ongoing and completed operations were the most critical evidence. There have been no regulatory issues.

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

Objective 16. 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 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 – Records of financial support and evidence of many types of outreach and forestry education were sufficient to assess the requirements.

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 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 & 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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