

# **Certification Program**

## **Finch Paper LLC Glens Falls, New York**

### **I. Company Background**

Finch Pruyn & Co., Inc. took root in 1865 when two enterprising entrepreneurs – Jeremiah Finch and Samuel Pruyn – formed a partnership to operate a grist mill, limestone and marble quarry, and sawmill on the banks of the Hudson River in the Upstate New York city of Glens Falls. In June 2007, the assets of Finch, Pruyn & Co., Inc. were purchased by Finch Paper Holdings LLC, which is owned by an investor group led by Atlas Holdings LLC and Blue Wolf Capital Management. The name of the Glens Falls mill was changed to Finch Paper LLC; today, the company’s 603 employees manufacture 250,000 tons per year of fine uncoated printing paper for marketing and business office uses.

Finch Paper LLC / Finch Forest Management manage approximately 50,672 acres of FSC certified forestland and 26,576 acres of SFI certified forestland through its Landowner Assistance Program (LAP), most of it within the boundaries of the six-million acre Adirondack Park in Upstate New York. The company manages property on behalf of Litchfield Park Inc. (12,165 acres), Elk Lake Land Inc. (12,631 acres), The Northwood’s Club (4,701 acres), Windfall Pond Forest (1,608 acres), Cedar Heights Timber (14,061 acres), Blue Devil Timber (1,783 acres) and Langley Park Associates (3,723 acres). The LAP lands where Finch Forest Management has direct “management control” supply approximately 10% of the pulpwood fiber to the company’s mill.

LAP forests are managed for the continual production of forest products while at the same time maintaining other open space ecosystem values including wildlife diversity, soil and water conservation, and open space recreation. The company employs extensive forestry techniques, utilize 75-150 year harvesting rotations and rely on natural regeneration to create the natural forest stands.

As much as 25% of the timber harvested is sold to other forest products companies. More than 90% of the wood used at the paper mill in Glens Falls is purchased from outside sources that fall into the “Wood Producer” category as defined in the SFI & FSC Standards. Only procurement of roundwood from Upper Hudson Woodlands, APT, LP; The Nature Conservancy Lands, and Elk Lake Land Inc. (Three Brothers Tract) is under a contractual 20 year fiber supply agreement where the company has the right and obligation to procure 65,000 tons of pulpwood per year on average until 2027.

Overall, Finch Paper LLC has eight foresters that handle all aspects of the company's forestry operation, including LAP and wood procurement. Four foresters work for Finch Forest Management in land management working on LAP lands. Two foresters and a Fiber Quality Technician are in Wood Procurement that purchase wood from outside sources to supply the company's manufacturing facilities. One forester is the Division Manager and oversees both the Finch Forest Management and Finch Wood Procurement Departments. Additionally a Woodlands Business Coordinator / Woodlands Accounting position was created in November 2009 to handle the increased work load in the Woodlands office and accounting duties. These employees are directly responsible for implementing and achieving the Sustainable Forestry Initiative and Forest Stewardship Council Forest Management Standards and have been assigned specific roles and responsibilities in the SFI & FSC Indicators and Evidence Manual.

Finch Pruyn & Company, Inc. and now Finch Paper LLC has been an SFI Program participant through its membership in the American Forest & Paper Association since the inception of the program (1999). Finch Pruyn & Company, Inc. and now Finch Paper LLC has been a FSC Program participant since 2003. Because round wood material is supplied from the company's LAP lands, and from independent wood producers, Finch Paper LLC is implementing all of the SFI and FSC Forest Management Standard Objectives.

Finch Paper LLC is active in a number of forestry associations and organizations that work on its behalf to help broaden the practice of sustainable forestry. These organizations include: 1) the Empire State Forest Products Association, 2) the Empire State Forestry Foundation 3) the American Forest & Paper Association, 4) the National Council for Air and Stream Improvement, 5) the Paper Industry Management Association, 6) the New York SFI – SIC, 7) the New Hampshire SFI – SIC, 8) the New Hampshire Timber Owners Association, 9) the Vermont SFI – SIC, 10) the Adirondack Research Consortium, 11) the New York Timber Producers Association, and 12) the Society of American Foresters.

The Company meets its SFI & FSC responsibilities by improving and demonstrating sustainable forestry on LAP lands, as well as directly participating in the state and regional associations and in the SFI Implementation Committees in New York, New Hampshire and Vermont to promote sustainable forestry on other properties.

In 2013 Finch started purchasing stumpage directly from private landowners on a small scale through Finch Forest Management operations. With these landowners the principles of sustainable forest management and the use of best management practices are reviewed and encouraged.

Finch Paper LLC Wood Procurement Foresters encourages its "wood producers" to encourage landowners that they purchase wood from to implement BMPs, protect visual quality, manage for wildlife and biodiversity, practice sustainable forest management, and to utilize professionally trained forest managers and loggers. This is communicated to the wood producers through formal written correspondence and oral communication.

On LAP lands, the company requires its logging contractors and each of its crew members to attend state developed logger training, or begin the training process within one year of initiating work. Where the company does not directly contract with loggers on its fee or leased lands, it strongly encourages its wood producers to attend SFI sponsored logger training programs. It continues to offer an incentive payment to wood producers that are trained and harvest timber under the supervision of an SAF or licensed forester.

Finch Paper LLC has a written SFI Policy, a written FSC Policy and a Wood Procurement Policy that guide its implementation of the SFI & FSC Standards. It communicates these policies to its employees through written correspondence from the company President and CEO. The SFI Policy, FSC Policy and Wood Procurement Policy are formally communicated to wood producers and landowners through written and oral correspondence.

The SFI & FSC Indicators and Evidence Manual contain references to objective evidence of conformance to the SFI & FSC Standards, including the company's SFI & FSC Policies. That evidence includes written documentation, interviews with responsible personnel, and inspection of field sites. A file containing all written documentation is maintained in Finch Paper LLC's Woodlands Headquarters office (Krum House) in Glens Falls, New York.

Finch Paper LLC has a responsibility to manage forests and procure wood products in a manner that does not compromise its adherence to the principles of sustainable forestry. This Certification Program is intended to guide the actions and activities of Finch Paper LLC.

## **II. Finch Paper LLC's Certification Program**

The following Certification Program has been developed to address each of the relevant requirements of the SFI 2022 (Section 2) Forest Management Standard, the FSC-US Forest Management Standard (v.1.0) and the Forest Management Group Standard FSC-STD-30-005 V2-0. The Sections of the SFIS & FSC Criterion are identified, along with a description of the corresponding program, plan, system or process.

### **SFIS 1.1 / FSC C7.1 Sustainable Harvesting Program**

#### **Forest Inventory & Harvesting**

Finch Forest Management conducts a long-term resource analysis that guides forest management planning at a level appropriate to the small size and non-intensive management scale of its land management operations.

Finch Forest Management conducts stand level inventories across the 50,672 acres of LAP lands. The inventory is conducted on a stand-by-stand basis as part of the pre-harvest planning phase and is documented in a Pre-Harvest Report.

The company also compares its general inventory information against the Forest Service FIA data for the counties in which it manages land, and the inventory information is generally

consistent. The growth of the forest across the company's wood and fiber supply area exceeds harvests and mortality, resulting in a positive growth to drain ratio.

Finch Paper LLC employs extensive forestry techniques utilizing 75-150 year rotations. The company relies almost exclusively on natural regeneration to create natural forest stands. The company harvests no more than 5% of its managed land base, on average. Adjustments are made to accommodate insect and disease outbreaks and other natural phenomenon. This conservative level of harvesting ensures a sustained yield of wood and fiber over the long-term.

## **Land Classification and Timber Typing**

Four major forest types occur on LAP lands including:

**1) Spruce-Fir flats:** These stands are found in lower elevations. The soils in spruce-fir flats tend to be shallow and poorly drained. Due to the limiting soil factors, shallow rooted spruce-fir species are best suited for survival on these sites, and will likely out-compete the hardwood species, which require better drainage and soil nutrient conditions. Some of our spruce-fir flats are important wintering yards for the Whitetail Deer.

**2) Low & Mid Slope Mixed wood Types:** Soil depth, drainage and nutrient richness tend to increase as we move up slope from the spruce-fir flats. Mid slopes, adjacent to the spruce-fir flats, tend to exhibit improved soil drainage and depth, consequently allowing for some hardwood species to compete and mix with spruce and fir. Hardwood species best suited to compete with spruce and fir in these areas is red maple and yellow birch. Mid slope mixed wood types offer silvicultural opportunities to favor the specie best adapted to a particular site.

**3) Upland Hardwood Types:** The upland sites tend to exhibit soil characteristics that make these sites the most productive on LAP land. Soil depth, drainage and nutrient retention are generally best in these sites with hardwood species such as sugar maple, beech, yellow birch, and black cherry dominating. Opportunities to grow high value timber are best in the upland sites.

**4) Upper Elevation Slopes:** The upper elevation slopes (generally exceeding 2,500' in elevation) tend to exhibit shallow, dry, nutrient leached soils. Tree species composition tends to be those species that are less competitive on the better sites. Species found on upper elevation slopes include red spruce and white birch. Activities involving forest management are limited within these sensitive areas, and timber quality is generally poor.

## **Silvicultural Options**

**1) Spruce-Fir flats:** Soil conditions in the spruce-fir flats are best suited to the continued maintenance and regeneration of spruce-fir. The rotation age for spruce-fir stands will be 75 - 100 years depending upon the percentage of balsam fir within a stand. Within spruce-fir flats, consideration must be given to special wildlife needs, as well as regulatory requirements involving wetlands. Silvicultural systems focused upon even aged management will - where ever practical - be the systems of choice. Uneven age silviculture will be used in those areas where uneven aged

stands will enhance wildlife, ecologic and aesthetic values (primarily within riparian zones). Silvicultural options include:

**A) Thinning:** Thinning will occur in merchantable spruce-fir stands that have become overstocked. Thinning will be based upon specie composition, and stand density, utilizing A Silvicultural Guide for Spruce - Fir in the Northeast as a guide. When thinning, we will not reduce the stand density below the “B” line. Thinning will remove those species and trees that would normally die out of the stand due to competition. The intent is to improve the specie and genetic composition of the stand leading to a regeneration harvest.

**B) Clearcut:** Clearcuts can be used to regenerate stands that have reached rotation age. Clearcut patch sizes must comply with all applicable laws, rules and regulations. The preferred clearcut technique is “Strip cut” where-by strips approximately 50' wide will be harvested leaving approximately 100' wide uncut strips. Residual strips will not be harvested until the cut strip has been sufficiently regenerated, but no sooner than 10 years. Strip cuts serve two purposes; they leave a two thirds residual for winter cover in the case of deer wintering yards (as recommended by the Adirondack Ecological Center), and they speed up reforestation by reducing competition from berries and grasses.

**C) Group Selection:** Group selection cuts will be used to create uneven aged stands. This silvicultural treatment will be used sparingly, and only in areas where an uneven aged stand will enhance ecologic, wildlife, and aesthetic values (primarily riparian zones). A minimum of three age classes will be created using harvest intervals of ten to twenty-five years. Harvest patch sizes will generally be no more than one and a half times the height of the adjacent timber. Patches will be evenly spaced throughout the stand, however placement of the patches will - as much as possible - target trees of poor health. Once an uneven aged stand has been created, future harvests will focus on maintaining a reverse “J” shaped curve of stems per acres plotted against diameter class.

**2) Low and Mid Slope Mixed Wood Types:** The rotation age for mixed wood stands will be 80 to 120 years depending upon specie composition. The silvicultural systems of choice for mixed wood stands will be even age systems, however, uneven age systems may be used to enhance wildlife, ecologic, and aesthetic values (primarily in riparian zones). Silvicultural options include:

**A) Thinning:** Thinning will occur in merchantable stands that have not reached rotation age and have become overstocked. The thinning will remove those species and trees that would normally die out of the stand due to competition. Thinning will seek to reduce stand density to the “B” line on an applicable stocking chart. The intent is to improve the specie and genetic composition of the stand leading to a regeneration harvest.

**B) Two or Three-Stage Shelterwood:** The shelterwood system will be used to regenerate mixed stands. The first stage of a three-stage shelterwood harvest resembles a thinning and is intended to improve the quality of the seed source, without reducing the stand density below the stocking guide “B” line. The second stage of a three-stage shelterwood is the “seed tree” cut where-by all but the seed-trees are harvested from the stand to a residual stocking of 40 square feet of basal area, creating conditions favorable for seed dispersal,

germination and survival (a two-stage shelterwood begins with this stage). The “final cut” of the two or three-stage shelterwood system is the removal of the seed trees, and occurs only after adequate regeneration has been achieved.

**C) Group Selection:** Group selection cuts will be used to create uneven aged stands. This silvicultural treatment will be used sparingly, and only in areas where perpetual cover is needed (in some riparian zones). A minimum of three age classes will be created using harvest intervals of ten to twenty-five years. Harvest patch sizes will in general be no more than one and a half times the height of the adjacent timber. Patches will be evenly spaced throughout the stand, however placement of the patches will - as much as possible - target trees of poor health.

**3) Upland Hardwood Types:** The rotation age for our hardwood stands will be 100 to 150 years. The silvicultural systems of choice for hardwood stands will be even age systems, however, uneven age silviculture may be used to enhance wildlife, ecologic, and aesthetic values (primarily in riparian zones). Silvicultural options include:

**A) Thinning:** Thinning will occur in merchantable stands that have not reached rotation age and have become overstocked. The thinning will remove those species and trees that would normally die out of the stand due to competition. Thinning will seek to reduce stand density to the “B” line on an applicable stocking chart. The intent is to improve the specie and genetic composition of the stand leading to a regeneration harvest.

**B) Two or Three-Stage Shelterwood:** The shelterwood system will be used to regenerate hardwood stands. The first stage of a three stage shelterwood harvest resembles a thinning and is intended to improve the quality of the seed source, without reducing the stand density below the stocking guide “B” line. The second stage of a three stage shelterwood is the “seed tree” cut where-by all but the seed trees are harvested from the stand to a residual stocking of 40 square feet of basal area, creating conditions favorable for seed dispersal, germination and survival (a two-stage shelterwood begins with this stage). The “final cut” of the two or three-stage shelterwood system is the removal of the seed trees, and occurs only after adequate regeneration has been achieved.

**C) Group Selection:** Group selection cuts will be used to create uneven aged stands. This silvicultural treatment will be used sparingly, and only in areas where uneven age silviculture will enhance wildlife, ecologic, and aesthetic values (in some riparian zones). A minimum of three age classes will be created using harvest intervals of ten to twenty-five years. Harvest patch sizes will in general be no more than one and a half times the height of the adjacent timber. Patches will be evenly spaced throughout the stand, however placement of the patches will - as much as possible - target trees of poor health.

**4) Upper Elevation Slopes:** Silvicultural treatments (if at all feasible) in the upper elevation slopes will be based upon a rotation age of 80 to 100 years. Even aged silviculture will be practiced in these stands. Silvicultural options include:

**A) Thinning:** Thinning will occur in merchantable stands that have not reached rotation age and have become overstocked. The thinning will remove those species and trees that would normally die out of the stand due to competition. Thinning will seek to reduce stand density to the “B” line on an applicable stocking chart. The intent is to improve the specie and genetic composition of the stand leading to a regeneration harvest.

**B) Two or Three Stage Shelterwood:** The shelterwood system will be used to regenerate mixed stands. The first stage of a three stage shelterwood harvest resembles a thinning and is intended to improve the quality of the seed source, without reducing the stand density below the stocking guide “B” line. The second stage of a three stage shelterwood is the “seed tree” cut where-by all but the seed trees are harvested from the stand to a residual stocking of 40 square feet of basal area, creating conditions favorable for seed dispersal, germination and survival (a two-stage shelterwood begins with this stage). The “final cut” of the two or three-stage shelterwood system is the removal of the seed trees, and occurs only after adequate regeneration has been achieved.

Salvage operations may be used in any of the above mentioned forest types whenever an unanticipated natural event causes damage to, or threatens a commercial forest stand. The controlling factors guiding a salvage operation are to improve the health of the residual forest stand and/or to fully utilize - as much as is practical - timber before further loss of value.

## **Soils Inventory & Mapping**

The company timber types its stands and enters the information onto tract maps. Mapping of LAP ownership is an ongoing process. Maps are upgraded with current information as part of the timber cruising process prior to timber harvesting. The maps are being entered into ArcView 10.4 (a computer enhanced drafting programs) creating a layered map that can be electronically updated. Tract maps are kept on file with other tract information including Pre- and Post-harvest Reports.

USGS topographic maps will be used as base maps for those properties for which no previous maps exist. Cover types will be added to these maps whenever a timber cruise is performed ahead of our normal harvest schedule. The maps will also be entered into the ArcView 10.4 program for future informational upgrades and changes.

The following information will be documented on base maps:

- Cover Types
- Classified Streams, Ponds, Rivers
- Contours
- Truck Roads (winter and summer)
- Areas of Unique Geological, Historic and/or Ecological Value
- Wetlands
- Important Wildlife Areas
- Wild/Scenic/Recreational/Study Rivers

In addition to the base maps, Finch Forest Management maintains maps or has access to websites that depict the following specialized information:

- Soil Types
- Deer Wintering Yards
- Regulated Wetlands
- Natural Heritage Sites

County soils information is also collected and, where the information is available, it is contained in the ArcView mapping system. Foresters generally use the soils information in identifying soils that are vulnerable to compaction and may present other management challenges. Where possible, heavy equipment and ground disturbing activities are avoided or minimized on soils vulnerable to compaction.

### **Resource Management and Harvest Level Planning**

Resource management of Finch, Paper's 50,672 certified LAP acres is accomplished through a geographic rotation of harvest operations combined with:

- Pre-harvest timber cruises
- Aerial Reconnaissance Flights
- Forester Ground Reconnaissance / Inspection
- Feedback from Recreational Lease Organizations, Landowners and Neighbors

Current harvest activity follows the management plan harvest schedules for each LAP property. Forestland inspection and harvest activity is planned to make a complete circuit of the property in 20 to 30 years (based upon the annual allowable harvest) on each landowner. This pattern follows historic harvest trends and will provide detailed resource data upon completion. Adjustments to the harvest pattern will be made to accommodate unanticipated disturbances (blowdown, ice damage, disease, insect etc.), scheduled 480a harvests.

Unanticipated disturbances to forest stands or to infrastructure (road system & bridges) are detected by a combination of routine yearly aerial flights, forester ground inspections, road crew ground inspection and feedback from recreational lease members, landowners and neighbors.

Following a timber harvest, a Post-Harvest Report documenting the post-harvest stand condition, and harvest volumes is completed and stored in permanent files. Necessary follow up information is also entered into a database for planning purposes. This information will become extremely valuable over time by providing detailed descriptions of past stand treatments to compare against the condition of the future stand. Future harvest activity will be based upon post-harvest report recommendations.

### **Growth and Harvest Calculations**

Annual harvest volumes are determined by using current timber inventory data of each LAP property then applying an annual growth increment obtained from United States Forest Service Forest Inventory and Analysis data for New York State, Resource Bulletin NRS-98. Growth vs. harvest drain records are maintained for each property on an annual basis. Based upon



these calculation, Litchfield Park (10,114 ac.) is 3,947 cord (9788 ton) per year, Elk Lake Land (6,867 ac.) is 2,383 cord (5,981 ton) per year, Three Brothers Tract (1,364 ac.) is 426 cord (1,098 ton) per year, The North Woods Club (4,070 ac.) is 2,324 cord (5,834 ton) per year, Blue Devil Timber LLC (1,494 ac.) is 569 cord (1,405 ton) per year, Windfall Pond (1,401 ac.) is 939 cord (2,450 ton) per year, Cedar Heights Timber (13,264 ac.) is 3,373 cord (8,197 ton) per year and Langley Park is (3,723 acres) 1,609 cord (4,215 ton) per year comparatively. Harvest volumes may exceed the yearly limit whenever it is necessary to salvage diseased or damaged timber.

## **Non-Timber**

Sustainable forest management planning provides both wood and non-timber forest products. Finch Forest Management reviews special sites, wild, scenic and recreational river corridors, wetlands, wildlife, open space recreation and other non-timber factors in its planning for long-term sustainable management.

There is increasing opportunities for carbon sequestration and storage on forestland. Finch foresters are committed to ensuring these opportunities are available to landowners should they wish to pursue them. In 2022 we had five landowners that entered into the NCX – Harvest Deferral carbon market. Currently there are no permanent set asides on any of Finch Forest Management managed properties for carbon sequestration, however, some less intensive options include extending the rotation age by 5-10 years and converting low productive forests to high productive forests through management that will improve stocking density and increase crown cover.

Foresters attend training and continuous education regarding the opportunities, markets and requirements for carbon options.

## **Timber Harvest Planning and Supervision**

All timber harvest plans and activities are supervised by a trained professional forester. District Foresters prepare and submit for review and comment, a stand-specific Pre-harvest Report. The Pre-harvest Report is based upon a current timber cruise. Attached to the report as supporting evidence is the timber cruise data, a map, and the stand stocking guide. Pre-harvest Reports are entered into a database for easy access to stand information. Permanent hard copies are kept on file by harvest unit.

Guidance for thinning in northern hardwood stands and mixed stands will come from the U.S. Forest Service [Research Paper NE-603](#). Guidance for thinning of hemlock stands will come from [Hemlock Management](#) - Kenneth Lancaster, U.S.D.A. Forest Service - 1984. Guidance for thinning in Spruce/Fir stands will come from [A Silvicultural Guide for Spruce-Fir in the Northeast](#). Guidance for thinning of White Pine will come from [A Silvicultural Guide for White Pine in the Northeast](#) by Kenneth Lancaster and Bill Leak. Regeneration cut prescriptions will utilize [The Practice of Silviculture](#) by Smith, for guidance.

Upon job completion, the Forester submits a Post-Harvest Report detailing the post-harvest condition of the stand including, stocking levels, basal area, and specie composition. If the Pre-

harvest Report prescribed some form of regeneration harvest (shelterwood, seed tree, unevenaged management etc.) then a regeneration cruise will be conducted no later than five years after the harvest to verify its effectiveness. The Post-Harvest Report quantifies actual harvest volumes down to the header level, critiques the harvest operation, and specifies follow up dates for stand review, and/or a regeneration check cruise. Post-Harvest Reports are entered into a database for easy access to stand information. Permanent hard copies are kept on file by harvest units.

Timber harvest contractors will not be allowed to leave a header until the supervising forester has approved the location of water bars, the condition of riparian zones, the lopping of tops, the utilizing of harvested material, and the cleaning of the header.

The company enters into “Jobber Contracts” only with those timber harvest contractors who have become certified or are working towards certification through New York Logger Training, or through other states programs that have been approved by New York Logger Training Program. Effective 12/31/00 all on ground employees of a timber harvesting crew must be certified, or within one year have enrolled in and / or completed certification (in the case of new crews or new employees to existing crews).

### **SFIS 2.1 / FSC C6.3 Reforestation Program**

The goal of Finch Forest Management is to regenerate each productive acre in order to bring the forest into a generally regulated state.

Foresters consider regeneration options during annual harvest planning. Following a regeneration cut, all harvested areas will be regenerated within 5 growing seasons. Regeneration of forest stands will be accomplished primarily by “natural regeneration.” However, seedlings will be planted if natural regeneration is not sufficient. This will be stock from local nurseries and will not be genetically engineered or exotic species.

Stands that have been damaged by disease, wind throw, fire, or ice, and are salvaged to or below the “C” line, will be regenerated naturally. In the case of salvage, the company allows the natural progression of species to regenerate the stand – even if it requires more than five years.

Survival surveys are conducted by the end of the fifth growing season to determine the survival of planted trees. These cruises are conducted by FP foresters, using regeneration measurement guidelines developed by the SUNY - ESF. Surveys showing survival under 1,000 seedlings per acres are considered for replanting or supplemental planting. Successful regeneration is documented for monitoring and reporting purposes. If minimum stocking requirements are not met, the supervising forester, in consultation with other forestry staff, will determine appropriate management alternatives for the stand.

Harvested areas will be considered sufficiently regenerated when there are at least 1,000 stems per acre of commercial species.

The company only plants tree species that are native to the region. No invasive or exotic tree species are planted. Where thinning is conducted, foresters work with the contract loggers to protect the crop trees. In some situations where advanced natural regeneration is occurring in small areas, advanced natural regeneration will be protected during harvest.

### **SFIS 2.2 / FSC C6.6 Forest Chemical Program**

Control of insects, diseases, or vegetative species mix is primarily accomplished through silviculture, without the use of chemicals or biologic agents. If the company does utilize pesticides, fertilizers, herbicides or other forest chemicals in the operational management of forests at a landowner's request, it does so in accordance with all labels, instructions, local laws and in a way that is consistent with SFI & FSC Standards. If required, trained or licensed individuals will be hired to oversee chemical applications.

### **SFIS 2.3 / FSC C6.5 Forest and Soil Productivity Program**

As a critical element in resource protection and management, soils are considered in every forest operation. County soils maps, where available, are used by the foresters as they plan forest management activities.

Soil erosion is minimized through silvicultural planning, BMP implementation and site restoration efforts. The company's reliance on natural regeneration in and of itself helps to protect and enhance forest and soil productivity due to the infrequent harvesting activity and, therefore, infrequent soil disturbance in any given area.

When compaction or site degradation could become a problem, it is controlled through proper logging techniques and corrective action. Different soil types and site qualities are targeted specifically to maximize growth rates.

Water resource protection is ensured through advanced planning of forest operations designed to minimize soil movement, sedimentation, and changes in water temperatures. State Best Management Practices related to forest roads, timber harvest, site preparation, regeneration or other silvicultural activities are followed.

Finch Forest Management policy is to minimize new road construction. Because road construction is a major cause of erosion and sedimentation, this policy will substantially reduce impacts on water quality. Existing roads may be relocated to avoid riparian management zones, erodible soils or other natural features that need to be protected.

Specific wet weather requirements include no excessive rutting across the majority of the harvested site. State BMPs are also followed to minimize rutting, particularly in riparian management zones.

### **SFIS 2.4 / FSC C6.3 Forest Health Program**

Finch Forest Management manages all forests under their responsibility in a healthy and productive condition to minimize their susceptibility to damaging agents. Finch Forest Management works in cooperation with government and private entities to locate and control damaging agents and root rot to maintain forest health.

Forest health is monitored and specific prescriptions are in-place to enhance forest health. Integrated pest management is used to avoid the use of chemicals and to lower costs. For example, thinning operations may be scheduled to prevent loss of growth as well as maintain stands in a vigorous, healthy condition.

Finch Forest Management cooperates with the Adirondack Nature Conservancy (Adirondack Park Invasive Plant Program) in its efforts to limit the introduction and spread of exotic species. The company has accessed Base Maps produced by the New York State Office for Technology and APIPP containing the distribution and location of terrestrial invasive plant species. Finch foresters have attended APIPP training on terrestrial invasive identification and control. The company also works closely with the Empire State Forest Products Association and New York State Department of Environmental Conservation to address the threat posed by exotic species (i.e. EAB, HWA, ALB, SPB, SM, SWW, SLF, Beech Left Disease and Oak Wilt).

The company applies an Adirondack Mix and North Country Mix of non-invasive grass seed and straw to landings as soon as feasible. The combination of non-invasive seed mix and using straw instead of hay as mulch is used to deter the introduction of invasive species. Ongoing monitoring of forest pests and exotic species is accomplished through aerial flights, lessee and landowner feedback, and forester onsite inspection.

Foresters complete aerial reconnaissance when the threat of insect infestations warrants or after substantial storm events. The standard strategy for controlling insect outbreaks is cutting infected areas and thinning the adjacent stand – striving to eliminate the host and the need for pesticides. With the threat of Emerald Ash Borer and Hemlock Woolly Adelgid on our doorstep foresters are keenly aware of the importance of early detection and control of forest pests.

Foresters work with state and local firefighting organizations to reduce incidence and severity of wildfire. Integrated Pest Management is implemented by managing the forest in a healthy and productive condition. Stands susceptible to insect and disease infestations are identified and harvested prior to infestation. Where insects, diseases or wind damages stands, they are promptly salvaged to ensure forest health.

The company will remove as soon as possible, large quantities of downed timber to reduce the risk of wildfire and insect outbreaks. And in an effort to slow the spread of Beech Scale

Nectria Disease, and promote healthy vigorous forests, the company removes diseased beech trees from its managed stands as practical.

Suppression of wildfires is accomplished in cooperation with state agencies for first response.

### **SFIS 3.1 / FSC C6.5 Water Quality / Best Management Practices Program**

Finch Forest Management ensures water resource protection through advanced planning of forest operations designed to minimize soil movement, sedimentation, and changes in water temperatures. State specific Best Management Practices are followed during all aspects of forest management including forest road construction and maintenance, timber harvesting, site preparation, reforestation or other silvicultural activities according to the companies written policies and guidelines specific to landowner wishes in the Management Plans.

Land use practices may vary throughout Finch Forest Managements operating area depending on soil characteristics, relief, precipitation, vegetation and special site-specific concerns. In all cases, water quality regulations and BMPs are met or exceeded.

Finch Forest Management maps RMZ's and delineates them on the ground. Foresters may contact state experts when BMP questions or concerns arise.

Finch Forest Managements "Jobber Contract" and "Forest Management Services Agreement" require contractors to comply with applicable laws and regulations, including state BMPs for water quality protection.

### **SFIS 3.2 / FSC C6.5 Riparian Management Zone Program**

Finch Forest Management is committed to protecting Riparian Management Zones (RMZ) adjacent to lakes, ponds, streams or other water courses where extra precautions in carrying out forest practices are necessary to protect water quality. Finch Forest Management has several objectives associated with RMZs:

1. Maintain the quality of water on Finch Forest Management LAP and owned lands by:
  - a. Maintaining a Riparian Zone of a minimum of 75 up to 200 feet on either side of NYS classified streams and other water bodies.
  - b. Maintaining a Riparian Zone of a minimum of 50 up to 100 feet on either side of perennial streams or other water bodies.
  - c. Maintaining a Riparian Zone of a minimum of 25 up to 50 feet on either side of intermittent streams or other water bodies when running or holding water.
  - d. Maintaining an adequate canopy of forest cover over all perennial streams to ensure normal water temperature.

2. Minimize forest soil erosion by maintaining the appropriate amount of residual forest cover under various soil and slope conditions.
3. Single tree and group selection will be used in the Riparian Zone where practical.
4. New hunting/fishing cabins will be located outside of the Riparian Zone.
5. Use of machinery will be minimized or eliminated in the Riparian Zone.
6. Skid trails will be allowed only if no other reasonable alternative exists.
7. Retention of wildlife trees will be included in the selection criteria for trees to be harvested within the Riparian Zone.

RMZs are maintained on perennial and intermittent streams and other water bodies where warranted, and as prescribed in the state BMP Manuals. This may include spring-heads, oxbows, and drains bordered by steep or erodible slopes. A perennial stream is one that has a well-defined channel and flows year-round except during periods of extreme drought. During periods of drought, perennial streams retain pools of water. Intermittent streams have seasonal flow and a continuous well-defined channel. Ephemeral areas flow during and for a few hours or days after periods of heavy rain and the stream channel is less recognizable than either perennial or intermittent streams. These should be treated as Intermittent streams when there is active water flow.

RMZ widths are dependent on, specific landowner wishes, forester discretion and the risk of erosion and minimum specifications are found in the State BMP Manuals. The boundaries of RMZs will be delineated and marked prior to commencement of a final harvest operation or during late rotation intermediate harvests. Flagging is generally used during pre-harvest preparation.

Finch Forest Management Foresters may use discretion and increase the width of the riparian management zone to account for sandy soil types, grades exceeding 25%, lack of vegetative cover or large watershed size.

Selective cutting may be done in a RMZ where LAP management plans permit. Every attempt should be made to minimize erosion due to harvesting in the RMZ. Minimize equipment operation in RMZs to prevent disturbance of the forest floor, especially in wet conditions. Crossings are to be identified by the forester on site and placed in stable locations at the most direct angle. Cleanup operations may have to be postponed until dry weather makes ground traffic suitable in the RMZs. Repair and stabilize ruts if they could carry sediment to the stream.

If an RMZ is damaged by storm, fire, insects, etc., a sanitation or salvage harvest may be required. Where possible, protect trees that are not damaged and evaluate the ability of the understory and ground cover to protect the stream and determine the need to assist re-vegetation or reforestation.

Finch Forest Management will not remove trees from banks, streambeds or steep slopes if it will destabilize the soil and cause water quality impacts. Under no circumstances shall logging debris or temporary stream crossing material be left in the streambed. Large woody debris in the water prior to harvesting shall not be removed from the stream. Equipment will not be operated in the RMZ under conditions where soil rutting could occur. Skid trails and landings should be kept away from the RMZ.

Finch Forest Management will also manage Riparian Management Zones to provide stand level wildlife habitat elements such as snags, mast trees, down woody debris, den trees and nest trees. Windrows and slash piles within management units will be retained for wildlife. Perennially wet areas, non-forested wetlands, and other low-lying areas will be protected.

Non-forested wetlands including bogs, vernal pools and marshes of significant size will be delineated on the ground and equipment will generally be excluded where rutting could occur. State BMPs will be followed to protect significant non-forested wetlands.

Upon completion of a harvesting operation, the condition of the riparian zones are reviewed by a field forester and recorded on a Post-Harvest Report and the database.

### **SFIS 3.2.3 / FSC C6.5 Adverse Weather Conditions Program**

In addition to BMP water quality guidelines, Finch Forest Managements program to address adverse weather conditions to protect soil productivity and reduce damage to the ecosystem, is to schedule harvesting activities in a manner that allows consistent and efficient harvesting levels while maintaining a sustainable supply of fiber for its manufacturing facility.

Wet weather logging is also planned for and prioritized according to:

- Soil types and conditions that is capable of supporting harvesting operations during adverse weather conditions. This may include well-drained soils, terrain, volume per acre (capable of supporting low impact logging systems), and operational access.
- Access roads must be capable of supporting harvesting operations. This capability may include soil type, road foundation, road surfacing and proximity to harvest area. Care is taken to maintain the integrity of road surfaces and drainage through the use of rock and culverts and may include allowing roads to drain following periods of wet weather. Care is also taken to minimize logging equipment being placed on roads and in road ditches. Any damage to roads or roads ditches is promptly repaired.
- Logging contractors are shifted to those operating areas that have the greatest probability of harvesting while minimizing logging damage to soils and roads. Tracts are harvested in compliance with applicable state BMPs.

Wet weather logging systems are utilized to minimize any logging damage to soils and roads. Depending on ground conditions, wet weather logging systems may consider one or more of the following:

- track feller buncher

- track forwarder
- high floatation tires
- track loader
- minimal road access
- low impact logging systems
- small conventional low impact logging

Wet weather tracts that meet the wet weather logging criteria are continuously sought out and may be reserved for harvesting when needed. During periods of adverse weather, higher cost sources of wood fiber and increased hauling distances may be necessary to obtain sufficient wood fiber, without putting undue pressure on local sources subject to the adverse weather event.

Foresters monitor BMPs on LAP lands using the Post-Harvest Reports. Logging Contractor Inspection Reports are also filled out addressing performance of logging contractors. These reports are summarized into a database and filed in the Tract Files and reviewed annually to identify any trends and weaknesses in the system. This information is used during the Annual Management Review process to continually evaluate effectiveness and improve performance as well as incorporated into Management Plan revisions.

#### **SFIS 4.1 / FSC C6.1, C6.3 Wildlife and Biodiversity Protection Program**

Forest and wildlife management activities can be successfully integrated to improve wildlife habitat and protect, enhance and increase game and non-game wildlife resources. In addition to timber and fiber production, forest management planning will assess the environmental impacts to the ecosystem's biodiversity and consider integration of activities to maximize wildlife benefits including economic, public relations and wildlife diversity.

Harvest operations will be planned so as to promote a diversity of forest age classes and habitats across the landscape. This diversity of age classes and habitats will be accomplished through the use of Even Aged Silvicultural Systems (Uneven Aged Systems will be used whenever practical within riparian zones).

Wildlife trees (cavity trees) will be left in regeneration harvest areas and riparian zones wherever practical. In addition, proximity to New York State "Forever Wild" lands, and the activity of beavers, will be taken into account when determining wildlife tree density.

Critical wildlife habitat such as deer wintering yards, rookeries, bat caves, lake side nesting areas, fresh water wetlands and spruce fir swamps will be identified prior to a timber harvest operation, and added to operational maps. Expert advice may be sought whenever harvest operations impact critical wildlife habitat.

Most of the managed land is leased to individuals who recreate and hunt game species. These recreation and hunting leases provide income to The Nature Conservancy, Litchfield Park, Elk Lake, and Finch Paper LLC which helps with management costs in owning this land base. Because of these hunting leases, Finch Forest Management requires its Foresters, where practical,



to consider the habitat requirements of game species when managing the land base. Documentation of wildlife diversity will be accomplished through the use of recreational lease surveys, and a periodic (10 year) biological survey on the LAP properties.

The following are current forest management activities performed by Finch Forest Management that are beneficial to game species:

1. **Road maintenance** – The main forest roads are maintained periodically using mechanical equipment. This practice prevents the roads from becoming overgrown with trees, and stays in an early successional stage. This practice is beneficial to these wildlife species by promoting forage production.

2. **Skid Trails** - When skid trails are built on Finch Forest Management lands, portions of these trails may be seeded with wildlife friendly plant species to stabilize the trail and to prevent soil erosion. Native Adirondack seed mixes using straw instead of hay are used to avoid the introduction of invasive exotic plants.

3. **Recreational Leases** – The majority of LAP land is leased to recreational users. These lessees help control wildlife species populations. Lessees are required by agreement to follow all state and federal hunting regulations and laws.

4. **Wildlife food plots** - Finch Forest Management allows lessees to plant logging decks, power line right-of-ways where soil erosion will not be a problem. These plots provide additional forage for wildlife species.

5. **Rotation length** -Sawtimber tree rotation of 75-150 years provide abundant herbaceous and fruit bearing plants at periodic intervals.

6. **Distribution of age classes** – Finch Forest Management does not harvest clearcut areas until adjacent units are at least 5 years old or 5 feet high at a desired level of stocking. This has the effect of distributing harvest units and different age classes across the landscape.

7. **Clearcut Harvest** – Finch Forest Management manages its clearcut harvests so that stands average around 15 acres and makes the clearcut shape irregular, where practical. These practices increase the edge around these forests, which provide additional food, cover and nesting sites for these wildlife species.

8. **Riparian Management Zones (RMZ)** - Finch Forest Management leaves Riparian Management Zones (RMZ's) on streams as required by the New York, New Hampshire and Vermont Best Management Practices, (BMP's). Within these zones, trees are selectively harvested and hardwood regeneration is encouraged. Hard mast species, such as oaks and beech, are left to provide food for these wildlife species. These wildlife species use these zones for travel corridors, feeding areas, and nesting sites.

In addition to the above wildlife management practices, habitat diversity goals are achieved by planning and applying management activities at the ownership and landscape scales. Stand

level habitat diversity goals are achieved by applying habitat management practices during silvicultural operations.

Finch Forest Management indicators for wildlife biodiversity include the production of early and mid-successional habitats. Maintaining these habitats is consistent with overall land management objectives of non-industrial private landowners and they are preferred by important game and non-game species. The identification and conservation of unique habitats also contributes to habitat diversity and the conservation of biological diversity.

The goal of providing habitat diversity at the landscape level is achieved by utilizing stand size and adjacency restrictions, riparian zone retention, designation of and conservation of ecologically unique habitats, retention of cover types during harvest scheduling and through the application of stand level habitat programs during harvest set-up and administration. The result is a mixture of stands of differing size, age classes and configuration, intermingled with less intensively managed riparian areas combined with unique areas and other non-timber producing habitats.

By using a mixture of even aged and uneven aged silvicultural techniques, our harvesting programs create periodic openings in the forest canopy, promoting the establishment of early successional plant life and providing an important food source for those species that rely on it for survival. Finch, Paper's commitment to habitat diversity is especially important given that fully one-half of the Adirondack Park is set aside by state law as unmanaged wilderness, limiting the availability of early successional stages on these lands.

Den or cavity trees are left in swamps and in RMZs when possible. Snag trees are left on site when possible and they do not represent a safety concern. Safety for employees and contractors is Finch Paper LLC's primary consideration in leaving snag trees.

Slash piles containing woody debris are generally left on most clearcut sites to enhance rodent, small game and reptile populations. Piling slash will be practiced where nutrient retention accomplished by spreading slash is not a concern.

Buffers beyond those prescribed in State BMPs may be used to emphasize landscape features in order to benefit wildlife travel corridors.

Foresters have access to a list of potential endangered species and applicable field guides. Information concerning endangered species will be reported to the VP of Forestry and Wood Procurement. Wildlife biologists may be consulted when specific wildlife management questions arise.

#### **SFIS 4.2.1 / FSC C6.2 Threatened and Endangered Species Program**

Finch Forest Management is committed to comply with applicable threatened and endangered species regulations. The general process used for managing known threatened and

endangered species is to voluntarily employ Best Management Practices (BMPs) established by appropriate management agencies.

Finch Forest Management has cooperated with the Adirondack Nature Conservancy to survey LAP lands to identify areas that contain unique or rare plant and animal communities. This report is used by the company to identify areas for special management and protection.

In addition, documents identifying the existence of known T&E species by state are reviewed prior to initiating field activities (e.g., Natural Heritage databases, NYSDEC Environmental Resource Mapper website). In the event that a T&E occurrence is confirmed on a harvest site during regular activities, the area is marked (with flagging) and the appropriate managers are notified, then oversee management to avoid a regulatory “take” of the species and reports the occurrence to the appropriate federal or state agency.

Future occupied sites would be identified and recorded on the timber stand maps. Species discovered after operations have begun will result in the immediate cessation of all operations and the appropriate protection and reporting procedures will be implemented before operations resume. Finch Paper LLC has not identified any federal endangered or threatened species on LAP lands.

Finch Forest Management considers full compliance with State BMPs as sufficient to satisfy the federal regulations for threatened and endangered aquatic species. When considering the management of habitat for threatened and endangered aquatic species, BMPs are reviewed and knowledgeable resource professionals (state, federal, or academic) may be consulted if interpretation is needed. If BMPs are determined to be insufficient to adequately protect threatened and endangered species, action plans for individual species may be developed that provide managers with necessary background information and required actions to ensure protection of the listed species.

Finch Forest Management worked with the state Department of Environmental Conservation on a multi-year program to protect a threatened strain of New York Brook Trout. Windfall strain Brook Trout have been stocked by DEC in two ponds on former managed forestland in Essex and Hamilton counties. Only a small number of Adirondack ponds are now home to the Windfall strain, and just three of those ponds, including the two on The Nature Conservancy property, have fish of an age capable of reproduction.

#### **SFIS 4.2.2 / FSC C6.2, C6.3.a.2, P9 Forests of Exceptional Conservation Value (FECV) Program**

This section outlines a planning process that the company will use to satisfy the FSC & SFI Standard for identifying known viable occurrences of G-1 and G-2 species and communities, and for collecting information in cooperation with the New York Natural Heritage Agency and Adirondack Park Agency.

The first phase of implementing the FSC & SFI Standard requirement is the identification of any known viable occurrences of critically imperiled (G-1) or imperiled species (G-2) and ecological communities on lands managed by the company.

### **Stage 1. Identifying Critically Imperiled or Imperiled Species and Ecological Communities**

The Finch Forest Managements Regional Manager and staff periodically conduct a search of NatureServe's database across its timberland management and ownership to identify any known occurrence of critically imperiled or imperiled forest species and ecological communities. This search is conducted online by accessing the NatureServe Explorer at [www.natureserveexplorer.org](http://www.natureserveexplorer.org). Additionally the New York State Department of Environmental Conservation Environmental Resource Mapper is used to identify imperiled species and ecological communities [Environmental Resource Mapper](#).

From the NatureServe database, as well as working with Natural Heritage Program staff, the company will retain the list of viable forest species and ecological communities identified as Global Heritage Rank G-1 and G-2. The company will check the viability of the record to ensure that the historical record is accurate and reliable. If the forest species and ecological communities are not located within the ownership of the company or are not considered viable, they will be removed from consideration.

### **Stage 2. Develop Conservation Strategies**

For known occurrences of G-1 and G-2 species and communities, the company will explore the development of a Conservation Strategy. Prior to developing a Conservation Strategy for forest communities identified as G-1 and G-2, the company will conduct an assessment of the historical disturbance patterns and successional processes, including the risk of fire and other disturbance regimes.

If a known occurrence of an aquatic species or community is identified, the company will implement appropriate water quality BMPs. It is assumed that BMPs will be sufficient to provide protection to any identified species or communities.

If a known occurrence of a terrestrial G-1 or G-2 species or community is identified, the company will coordinate with the Heritage Agency to identify appropriate management practices and strategies. Currently, no known occurrence has been verified to occur on LAP owned land.

As new information and mechanisms are developed to identify and protect Forests of Exceptional Conservation Value, the company will adjust and refine its plans for addressing this requirement of the SFI / FSC Standards.

Consistent with the intent of the standards, the company will proceed with the expectation that mechanisms will be available to provide economic return for the societal values provided by the LAP's managed forests including: conservation easements, rental payments, land trades, tax policy, direct purchases or other equitable forms of securing economic return.

The company will evaluate the overall costs of implementing a conservation strategy. If the protection of an individual species or community carries exceptionally high costs or carries with it disproportionate impacts on the landowner, the company is free to implement other management or operational alternatives that are more appropriate from an economic and sustainability standpoint.

As part the company's ongoing training in the identification and protection of threatened and endangered species, critically imperiled and imperiled species and ecological communities will be added as appropriate. The Regional Forest Manager and Vice President of Forestry and Wood Procurement will serve as the company experts when it comes to T&E and G-1 and G-2 species and communities.

### **SFIS 4.2.3 / FSC C6.3.a.3 Conservation of Old Growth Forests**

Finch Forest Management actively works with the Adirondack Park Agency to manage LAP lands in harmony with the other lands managed within the Adirondack Park for old growth characteristics. The company is also working with the New York State Department of Environmental Conservation Open Space Committee to address the conservation of old growth forests and open space.

The company is also active in the Empire State Forest Products Association addressing the old growth management issue. The States of New York, New Hampshire, and Vermont have several agencies and private conservation organizations that are working to recreate older forests across the landscape. Generally, the region's forests are getting older and sufficient reserves of old growth timber are available.

### **SFIS 4.3 / FSC C6.4 Ecologically Important – Special Sites Program**

Finch Forest Management has identified sites that contain unique biological, ecological, archeological, historical or cultural attributes. Areas of unique ecologic, geologic, and historic value have been identified and managed so as to conserve their unique characteristics. Criteria used to identify unique ecologic, geologic and historic areas include:

- Regulatory Identifiers (wild, scenic, recreational, study rivers; wetlands, lakes, ponds, Classified Streams)
- Geographic Uniqueness (major waterways, geographic landmarks)
- Public reports
- Professional Staff Knowledge
- Finch, Pruyn Biological Survey of 2001
- NYS Natural Heritage Program
- Natural Heritage Biological Survey 2008
- NYSDEC Environmental Resource Mapper
- FFM Rare Plants, Animals and Significant Communities Report

The company also considers critical environmental areas, including future known G-1 and G-2 species and communities, to its Special Sites Program. The locations of all Special Areas are entered into the ArcView program and paper copy maps are produced.

The following is a listing of management options to be applied to unique areas, and a description of those options:

<b>Preserve</b>	Does not include any active on-site operations.
<b>Special</b>	Active management that does not include commercial timber harvest, but focuses on maintaining the “special qualities” on the site.
<b>Modified</b>	Management that includes commercial timber harvest but for which typical operations modified to protect special qualities.
<b>Other</b>	Management which utilizes scientifically established silvicultural techniques, and study silvicultural techniques for research and educational purposes.

Prior to timber harvesting and site disturbance activities, an assessment for unique ecological, geological, riparian, and historic areas will be completed. Identification, evaluation and management will be documented in Pre-harvest Reports. The effects that site disturbance will have on landscape level factors such as riparian systems, sensitive habitats, connecting corridors, successional stage forests, unique ecosystems, etc. will also be assessed at this time and documented.

Special places such as Wild, Scenic, Study, and Recreational River corridors, wetlands and ponds are clearly identified on operational maps. Whenever an operation is planned in an area where a special place is located, the boundaries of the special place are flagged on the ground to provide a clear delineation of where operational practices must change.

Finch Forest Management has also cooperated with the Adirondack Nature Conservancy to complete a survey and report of the entire ownership with a focus on natural heritage-quality communities and unique or rare species.

**SFIS 4.4 / FSC 7.1 Assessment of Forest Cover Types, Wildlife Habitat and Biological Diversity**

Finch Forest Management has coverted the majority of LAP lands. It has removed from management those lands that are non-productive and/or provide other ecological and wildlife resource benefits that contribute to biological diversity. The company manages RMZs, visual buffers, rock outcrops, steep slopes, non-productive and inaccessible areas for wildlife and biodiversity purposes. It also manages stand “legacies” such as older trees, mast producing trees,

snags, and den trees in riparian areas. The percentage of land removed from timber production for wildlife and biodiversity purposes is approximately 15 to 20 percent of the LAP acreages.

Finch foresters consistently attend continuing education programs to stay abreast of forest health issues, Threatened and Endangered Species, biological habitat, biological diversity. This education along with field experience and information technology is used to develop forest management plans. An assessment of cover type, stage and habitat has been done for each landowner.

### **SFIS 5.1 / FSC C4.4.a, C7.1.j Visual Quality Management Program**

Timber harvest operations are conducted using the NYS Timber Harvesting Guidelines and the New York State Forestry Best Management Practices BMP Field Guide. In addition, the FRA's Forestry Aesthetics Guide and the FRA's Professional Mechanical Harvesting Practices guides will be used as a basis for all skid trail layout/building, landing layout/building, clean water standards, and aesthetics standards for all of company owned and service forestry lands. All Adirondack Park Agency rules and regulations that apply to timber harvesting within the Adirondack Park will be adhered to.

### **SFIS 5.2 / FSC C4.4.a, C7.1.i, C7.1.j Clearcut Size Program**

Clearcuts will be less than 25 acres in size as regulated by the Adirondack Park Agency. In addition, clearcuts will be planned, laid out, and implemented so that regeneration will be accomplished within five growing seasons. Buffer strips between clearcut patches will comply with Adirondack Park Agency regulations, and will be located using wildlife habitat and silviculture as the primary focus.

Timber harvesters will not be allowed to leave a landing until all down timber is skidded, and the skid trails have been water bared (winter harvest operations on frozen ground will be water bared the following spring / summer by Finch Forest Management road crew or hired contractors). In addition:

- a. All debris (garbage) will be picked up and removed from the property.
- b. All merchantable wood will be neatly piled to be removed from the landing in the next load.
- c. All unusable material will be pushed from the landing and - as much as possible - feathered into the woods.
- d. Water bars will be installed as per the guidelines listed in New York State Forestry Best Management Practices BMP Field Guide.
- e. Harvesters will be required to provide a bond to cover contract non-compliances that become liabilities to the company.

Where clearcut harvest boundaries will not employ a stand line, RMZ, or other natural boundary, the Foresters should attempt to establish a harvest boundary of an irregular shape.

Additionally, where clearcut size is maximized, the use of retention trees & patches will be evaluated.

In the event of insect infestation, wildfire or other natural catastrophes, clearcut salvage areas may be larger. Large-scale salvage operations are documented in the tract files, but are not included in the calculation of the annual average clearcut size.

### **SFIS 5.3 / FSC C4.4.a, C7.1.j Green-up and Adjacency Program**

Foresters employ “green up” principles to manage forests that result in visually pleasing landscapes while operating within company economic guidelines.

Following a clearcut, the areas adjacent to the clearcut will not be harvested until the clearcut area has at either five-year-old regeneration, or the regeneration averages five feet in height. In either case, stocking must be at least 1000 to 2000 stems per acre. Adirondack Park Agency regulations prohibit the removal of residual buffer strips for ten years following a clearcut.

RMZs that serve as an adjacency buffer must be no less than 100 feet (total width) between the clearcut units and must meet minimum state BMP guidelines. When RMZs are utilized as an adjacency buffer, retain 50% crown cover within the RMZ, or the extended buffer, until green-up requirements have been met in the adjacent stand.

The Post-Harvest Reports and database will be used to monitor and track adherence to the Green-up requirement.

### **SFIS 5.4 / FSC C6.5.g Recreation Program**

Finch Paper LLC recognizes that the recreational use and open space attributes of LAP land is compatible with and enhanced by the company’s timber management program. Our goal is to manage all lands to enhance the experience of the recreational organizations and landowners that use it.

While some properties are owned by private clubs, we strive to lease all acreage of properties available for lease. A formal recreational lease contract is signed between the landowner and lessee.

- Policies affecting hunting and fishing on LAP lands include:
- Adherence to NYS Fish and Game rules and regulations
  - Finch Paper monitoring of deer feeding
  - Finch Paper monitoring of fish stocking
  - Lessee reporting of game take
  - Lessee reporting of hours of recreational use



Policies affecting camps built on LAP lands include:

- Camp size not to exceed 500 square feet of useable floor space
- Camp density not to exceed one per 100 acres.
- Camp locations must comply with local and APA regulations
- Camp locations must be approved by a Finch Paper forester
- Vegetation cannot be cut without Finch Paper forester’s approval.
- Firewood may only be used for the camp and not hauled offsite.
- Trailers must be registered and only for temporary use
- Only surface discharge of gray water will be allowed
- Fuel storage other than approved propane tanks is not allowed.
- Finch Paper will enforce a “carry in -- carry out” policy.

**SFIS 6.1 / FSC C6.2, C6.3 Special Sites Program**

Finch Forest Management has identified sites that contain unique biological, ecological, archeological, historical or cultural attributes. Areas of unique ecologic, geologic, and historic value have been identified and managed so as to conserve their unique characteristics. Criteria used to identify unique ecologic, geologic and historic areas include:

- Regulatory Identifiers (wild, scenic, recreational, study rivers; wetlands, lakes, ponds, Classified Streams)
- Geographic Uniqueness (major waterways, geographic landmarks)
- Public reports
- Professional Staff Knowledge
- Finch, Pruyn Biological Survey of 2001
- NYS Natural Heritage Program
- Natural Heritage Biological Survey 2008
- NYSDEC Resource Mapper
- FFM Rare Plants, Animals and Significant Communities Report

The company also considers critical environmental areas, including future known G-1 and G-2 species and communities, to its Special Sites Program. The locations of all Special Areas are entered into the ArcView program and paper copy maps are produced.

The following is a listing of management options to be applied to unique areas, and a description of those options:

- Preserve** Does not include any active on-site operations.
- Special** Active management that does not include commercial timber harvest, but focuses on maintaining the “special qualities” on the site.
- Modified** Management that includes commercial timber harvest but for which typical operations modified to protect special qualities.

**Other** Management which utilizes scientifically established silvicultural techniques, and study silvicultural techniques for research and educational purposes.

Prior to timber harvesting and site disturbance activities, an assessment for unique ecological, geological, riparian, and historic areas will be completed. Identification, evaluation and management will be documented in Pre-harvest Reports. The effects that site disturbance will have on landscape level factors such as riparian systems, sensitive habitats, connecting corridors, successional stage forests, unique ecosystems, etc. will also be assessed at this time and documented.

Special places such as Wild, Scenic, Study, and Recreational River corridors, wetlands and ponds are clearly identified on operational maps. Whenever an operation is planned in an area where a special place is located, the boundaries of the special place are flagged on the ground to provide a clear delineation of where operational practices must change.

Finch Forest Management has also cooperated with the Adirondack Nature Conservancy to complete a survey and report of the entire ownership with a focus on natural heritage-quality communities and unique or rare species.

### **SFIS 7.1.1 / FSC C5.2, C5.3 Wood Utilization Program**

Finch Forest Management utilization program is to efficiently saw and utilize all merchantable timber designated for removal according to the harvest delivery agreements on all company-owned and leased timberland. Utilization monitoring is conducted via periodic supervision and onsite checks on lands of Finch Forest Management tracts using the Post-Harvest Reports and Contractor Inspection Reports.

Utilization specifications are adjusted as needed to stay current with market conditions. Other species and grades that are not consumed by Finch Forest Management are marketed to other local mills. The Jobber Contracts also contain wood utilization requirements and specifications.

Contractors are urged to spread unmerchantable residue across skid trails and landings and to minimize waste as much as possible. In woods chipping operations are becoming more readily available and where practical, contractors are encouraged to utilize this as well as other advanced technology in harvesting of trees.

### **SFIS 8.1 / FSC C3.1, C3.2, C3.3 Indigenous Peoples Rights Program**

It is Finch Paper LLC's policy to manage Finch Forest Management client properties and our own property in compliance with all relevant laws, treaties and agreements on the local state and federal levels. In doing so it is also Finch Paper LLC's intent to acknowledge and respect the rights of Indigenous People in the areas that we manage land. Of the current area that we manage

land Franklin County in the Northern Adirondack Region of New York is an area where the St. Regis Mohawk Indians have a reservation and former land claims.

**SFIS 8.3 / FSC C3.2.a, C3.2.b Indigenous Peoples Outreach**

Finch Paper LLC has communicated with the St. Regis Mohawk Council and the Stockbridge – Munsee Band in writing w/ map attached explaining the eight properties that we manage in the Adirondack Park (last in the spring 2021). We have asked tribal representative if there are sites of current or traditional cultural, archeological, ecological, economic or religious significance on the properties that we manage. To date the Council has never gotten back to us either verbally or in writing.

Additionally, we have reached out to Melanie O’Brien of the National Native American Graves Protection and Repatriation Act (NAGPRA). Ms. O’Brien responded to our request that no cultural items were removed from Franklin or Hamilton counties. There are two Indian tribes that were consulted on cultural items removed from Essex County, NY – the Stockbridge – Munsee Community, Wisconsin and the St. Regis Mohawk Tribe in New York.

**SFIS 9.1 / FSC C1.1, C1.6 System to Achieve Regulatory Compliance and Relevant Web Sites**

Finch Paper LLC has a Code of Business Conduct which promotes safety, adherence to all applicable laws and regulations, equal opportunity hiring practices, responsible community and environmental policies and practices and conduct Company’s business affairs in ways that continue to earn respect of our shareholders, directors, employees, community, government agencies, customers, suppliers and competitors.

Finch Paper’s LLC CEO has signed an SFI Policy & FSC Policy statement committing the organization to implementing and achieving conformance to both standards. The SFI & FSC Policy statements are on file at the Krum House office in Glens Falls, New York. Finch Paper LLC’s SFI & FSC Policy specifies a commitment to achieving compliance with applicable environmental, forestry and socials laws and regulations on its fee and leased lands where it has direct control of management activities. The Company has a system in place to ensure that such laws and regulations are implemented and achieved.

The system to achieve regulatory compliance includes:

- a. knowledge of all federal, state and local laws harvest ordinances;
- b. compliance with all international regulations;
- c. a commitment to achieve continuing regulatory compliance;
- d. contract provisions requiring contract loggers to comply with applicable laws;
- e. required training of contract loggers;
- f. reporting of required timber and property taxes to landowners;
- g. monitoring regulatory compliance;
- h. taking corrective and preventive action; and
- i. management review and continual improvement.

If a regulatory non-compliance issue on controlled lands were to be uncovered by either company staff or regulatory agency personnel, the company is committed to taking prompt corrective action with the contract logger to mitigate any environmental impacts.

Finch Paper LLC staff have Internet access to regulatory agency web sites where they can access the most current versions of relevant laws and regulations. The most relevant web sites are listed below, along with other appropriate association and agency web sites:

### **Federal Agency Pages**

U.S. Fish & Wildlife Service – <http://www.fws.gov/>  
U.S. F&WS Endangered Species – <http://endangered.fws.gov/>  
U.S. F&WS National Wetlands Inventory Center – <http://wetlands.fws.gov/>  
U.S. Environmental Protection Agency – <http://www.epa.gov/>  
U.S. EPA Wetlands – <http://www.epa.gov/OWOW/wetlands/>  
U.S. Army Corps of Engineers – <http://www.usace.army.mil/>  
USDA Forest Service - <http://www.fs.fed.us/>  
USDA Forest Service – North Central Research Station – <http://www.ncrs.fs.fed.us/>

### **Forestry/Logging and Environmental Pages**

National Timber Harvesting and Transportation Safety Foundation – <http://www.loggingsafety.com/>  
National Council for Air and Stream Improvement – <http://www.ncasi.org/>  
Forest Resource Environmental Information – <http://www.freenetwork.org/>  
American Forest & Paper Association – <http://www.afandpa.org/>  
Council on Forest Engineering – <http://www.cofe.org/>  
Northeastern Loggers Association - <http://loggertraining.com/>  
New York – <http://www.newyorkloggertraining.org/>  
New Hampshire – <http://www.nhtoa.org/>  
Connecticut – <http://www.dep.state.ct.us/burnatr/forestry/forestcert/certific.html>  
Vermont – <http://www.vtleap.com>  
American Loggers Council – <http://www.americanloggers.org/>

### **State Environmental Agency Home Pages**

NY Department of Environmental Conservation - <http://www.dec.ny.gov/>  
NYSDEC Environmental Resource Mapper - <http://www.dec.ny.gov/gis/erm/>  
VT Department of Environmental Conservation - <http://www.anr.state.vt.us/dec/dec.htm>  
NH Department of Environmental Services - <http://des.nh.gov/>  
MA Department of Conservation and Recreation - <http://www.mass.gov/dcr/>

### **SFI Implementation Committees**

About SFI – <http://www.sfiprogram.org>

### **SFIS 9.2 / FSC C4.1 Compliance with Social Laws**

Finch Paper LLC has an Equal Employment Officer and an Equal Employment Opportunity Policy which is publically posted at numerous locations through our facilities. Additionally, Finch Paper LLC complies with all New York State and Federal Employment laws and publically posts these laws at numerous locations through our facilities.

### **SFIS 10.1, 10.2 & 10.3 / FSC C8.2 Support for Forestry Research**

Finch Paper LLC supports forestry research and continuing education through direct committee participation in the New York SFI State Implementation Committee and also The New Hampshire SFI State Implementation Committee. Additionally, Finch Paper LLC also, contributes financially to both programs through our annual SIC dues.

Finch Paper LLC through our membership in the National Council for Air and Stream Improvement contribute to forest research, science and technology in such programs as NCASI's Sustainable Forestry and Eastern Wildlife Program (SFEW) a NCASI project headed by Dr. Ben Wigley. NCASI also has numerous research projects currently looking at the effects of climate change on forest health, wildlife and biological diversity.

### **SFIS 11.1 / FSC C7.3 Staff Training and Education**

A written statement of commitment by Finch Paper LLC CEO Debabrata Mukherjee in implementing and achieving the SFI 2015 – 2019 Forest Management Standard and the FSC-US Forest Management Standard (v1.0) for its land management and wood procurement programs is posted at locations throughout our facilities and also on our website.

Finch Paper LLC managers, foresters, technicians and accounting staff have received training appropriate to their roles and responsibilities. A Training Matrix outlines training requirements for each job category within the company. The Vice President of Forestry and Wood Procurement annually reviews training accomplishments with staff members to determine appropriate levels of training and to ensure that training requirements have been achieved. Opportunities for future staff education and training may be identified on the Training Matrix, as appropriate.

### **SFIS 11.2 / FSC C7.3 Program to Promote Certified Logging Professionals, Qualified Resource and Logging Professionals**

Finch Paper LLC actively encourages its wood producers to encourage landowners that they purchase wood from to utilize the services of qualified resource professionals and qualified logging professionals in applying principles of sustainable forest management.

Finch Paper LLC provides an incentive payment to wood producers selling wood to the company who obtain and maintain professional logger certification, and harvest timber under the

supervision of a SAF member or licensed forester representing the landowner utilizing a silvicultural system that addresses reforestation.

Finch Paper LLC Procurement Foresters check the list of qualified logging professionals to determine if the wood producer has met the continuing education requirements. The company communicates its Wood Procurement Policy with each of its wood producers through written correspondence and oral communication.

Operations meeting the following criteria will be eligible for the trained logger incentive rate at the discretion of Finch Paper LLC wood procurement staff by paying \$.50/ton more for wood delivered:

Operations where the vendor verifies that either an on-site logging foreman or the majority of the logging crew (both members of a two-man crew, two members of a three-man crew or three members of a four-man crew, etc.) have completed a recognized certified logger training program (see listing of such programs). Current certification status will be provided by logger and will be verified by Finch Paper LLC wood procurement staff. The harvesting must be done utilizing Best Management Practices (BMP's) for that particular state.

In 2019 Finch Paper LLC sponsored three individuals to attend the Paul Smith's College School of Logging for a one month period during the summer of 2019. During the month long training course participant were trained in timber harvesting safety, conventional and mechanical timber harvesting operations, silvicultural prescriptions, Best Management Practices, forest product markets and became New York Logger Trained Certified after successful completion of the course. In 2020 this program was put on hold due to the Corona Virus Pandemic.

**Recognized certified logger training programs:**

- New York Logger Training (NYLT)
- New Hampshire Professional Loggers Program (NHPLP)
- Logger Education to Advance Professionalism LEAP (Vermont)
- Timber Harvesters License (Massachusetts)
- Supervising Forest Products Harvesters (Connecticut)

**Logger Training Requirements under FFM Operations**

Finch Forest Management has defined "contractor" as those logging contractors that have a direct contractual relationship with the company to harvest timber from its LAP lands. These contract loggers are required to sign a "Jobber Contract" or "Timber Cutting Agreement" specifying the expectations of the company.

The company requires that all logging contractors and their crew members working on LAP lands to complete an SFI / FSC recognized\* training program. To be eligible to work on Finch Paper LLC's controlled lands contractors must have completed training requirements or they must begin the required training within one year of initiating work.

\*SFI / FSC recognized training is defined by:

A trained logging contractor must be in full compliance with a State Implementation Committee's (SIC) logger training requirements for completing SFI core courses as well as continuing education requirements.

If a contractor meets the current requirements of the state where they received training, they are considered trained with respect to Finch Paper LLC's policy and may work in any state where we operate.

### **Tracking and Monitoring Compliance**

The Regional Manager and staff are responsible for tracking compliance with Finch Paper LLC's logger training policy. Documentation of training is checked with the state logger training database.

### **Road Maintenance Contractor Training Requirements**

Contractors providing road maintenance services that contract directly with Finch Paper LLC must have received appropriate BMP training. Contractors performing such services must be familiar with applicable State BMP'S and Finch Paper LLC's SFI Policy. Training requirements are met if a contractor meets any ONE of the following criteria.

- a. A contractor has completed a SIC recognized training module for road building contractors.
- b. A contractor has completed a SIC recognized "BMP" or "environmental" training module for loggers.
- c. A contractor has completed training provided by Finch Paper LLC that meets the requirements of this policy.

### **SFIS 12.1 / FSC P5 Support and Promotion of Sustainable Forest Management**

Finch Paper LLC works with state associations and provides support (monetary and in kind) to the SFI State Implementation Committees in New York, Vermont and New Hampshire. Justin Saville and Leonard Cronin are current American Tree Farm System inspectors. FFM has hosted New York Forest Owners Association (NYFOA) meetings on client properties and an annual day-long tour of its sustainably managed LAP forests through the Temperate Forestry Foundation's annual teacher's tour. Included on these tours are visits to forests in various stages of growth, overviews of various harvesting practices and a visit to an active harvesting site. Participants have the opportunity to talk directly with Finch Paper foresters and our independent timber harvesters regarding their work. Past tours have also included guest presenters such as the coordinator of New York State's SFI Implementation Committee and the director of the State University of New York College of Environmental Science & Forestry's Adirondack Ecological Center who explained the important link between timber harvesting and the availability of a

diversity of wildlife habitat. The teachers are also provided with a number of written materials regarding FSC & SFI.

The company is active in the Empire State Forest Products Association's public outreach and communication efforts. This includes informational brochures, advertisements, and other outreach materials.

### **SFIS 12.2 / FSC P5 Landowner Outreach Education Program**

Finch Forest Management and Finch Paper Wood Procurement staff has increased efforts to promote sustainable forest management and forest certification through our landowner information packets, Finch Paper LLC website, Finch Paper LLC FFM booth at county fairs and regional trade shows, and onsite Tree Farm Inspections.

Additionally, FFM foresters have been active with Arbor Day and Earth Day activities at local schools and provided lectures and mill tours for SUNY-ESF, SUNY-Ranger School, SUNY - Plattsburgh, Paul Smith's College and Vermont Forest Business School.

### **SFIS 12.3 / FSC C4.4 Process to Receive and Respond to Public Inquiries & Complaints and Stakeholder Consultation**

Finch Forest Management has a formal process for receiving and responding to public inquiries, including those that potentially relate to practices that appear to be inconsistent with the SFIS Principles and Objectives.

Signage is posted on all landing areas which include the phone number and inquiries can be received by phone or website. If a phone call or other public inquiry comes in to Finch Forest Management, the message will be documented on a call/incident report, filed and forwarded to the Vice President of Forestry and Wood Procurement. The Vice President of Forestry and Wood Procurement will either follow up with the entity making the inquiry, or forward the concern on to the SIC Inconsistent Practices Committees for resolution. (Finch Forest Management has also provided all contractors working on LAP lands as well as those producers from whom we purchase wood with the American Forest & Paper Association phone number for reporting inconsistent practices.)

General outreach to stakeholders and information can be found on the Finch Forest Management website, particularly in the 'Lessee Information' section, at county fair booths and for large or controversial operations, direct stakeholder consultations occur with landowners, lessees and neighbors through public and private meetings including club meetings and town meetings.

### **SFI 14.1 & 14.2 Annual SFI Progress Report**



Finch Paper LLC compiles and maintains information on its landowner outreach efforts, wood producer and employee training and education, the percentage of wood delivered to its mill by qualified logging professionals, and reports this information to SFI on an annual basis by the March 30<sup>th</sup> deadline. Copies of past annual progress reports are maintained and demonstrate a pattern of continual improvement.

Finch Paper assists AF&PA in circulating its annual SFI report to the public by making it available at a variety of community events at which the company participates.

### **SFIS 15.1 / FSC C8.1, C8.2 System to Evaluate Effectiveness and Improve Conformance**

Finch Paper LLC has a formal system for annually collecting information about its SFI & FSC implementation, evaluating the effectiveness of its SFI & FSC Programs, reporting information to management, determining whether any changes or improvements are necessary to continually improve conformance, and communicate those changes to responsible personnel.

Foresters and Procurement Foresters conduct monitoring using the Post-Harvest Reports on controlled lands and the Wood Procurement Timber Harvest Inspection Reports on wood producer tracts. Foresters and Procurement Foresters are encouraged to provide suggestions for program improvement.

Publicly available sources of information are also collected regarding reforestation and use of BMPs across the primary wood and fiber supply area. The Regional Manager and Procurement Manager review this information and look for patterns and trends.

The Vice President of Forestry and Wood Procurement, Regional Manager and Procurement Manager review the effectiveness of the overall SFI & FSC Programs using the summary reports and other input and determine whether any changes or improvements should be made.

The Vice President of Forestry and Wood Procurement then presents recommendations and changes to the company President and CEO as part of a formal annual management review meeting. The President and CEO review the proposed recommendations and make appropriate suggestions. The Vice President of Forestry and Wood Procurement then summarizes those changes and communicates them to other responsible personnel within Finch Paper LLC.

The Regional Manager and Procurement Manager then incorporate changes and improvements into the SFI Policy, FSC Policy, Wood Procurement Policy, Certification Program Indicators and Evidence Manual and other SFI & FSC Program documents and procedures.

### **Overall Monitoring and Evaluation of Certification Conformance and Development & Implementation of strategies in Management Planning**

Monitoring is conducted in accordance with the Management Plans on an ongoing basis to evaluate and assess the condition of the forests, yields and utilization, chain of custody, compliance with standards and overall management activities including their impacts on the environment and these are incorporated into Finch Forest Management policy revisions and individual management plan updates.

Stand level monitoring is done consistently by the Foresters pre and post-harvest and annual monitoring is done quarterly and annually to trend yield and growth, costs, productivity and the efficiency of forest management.

Stakeholder meetings and management plan revisions are completed annually and include a review of R, T & E species, habitat and ecological presence, condition of RMZs and ecologically significant areas as well as the impact of the timber and infrastructure management and open space recreation. When necessary, experts will be consulted during this process.

By implementing the above programs, plans, systems and processes, Finch Paper LLC / Finch Forest Management continually improves its performance and achieves its objective of practicing and promoting sustainable forest management.