

FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY CERTIFICATION EVALUATION REPORT

State of Wisconsin Department of Natural Resources

SCS-FM/COC-0070N

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CERTIFIED	EXPIRATION
01/13/2009	01/13/2014

DATE OF FIELD AUDIT
Aug/18-23/2013
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Foreword

SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as “well managed,” thereby permitting the FME’s use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<http://info.fsc.org/>) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Certificate Registration Information

1.1.1.a Name and Contact Information

Organization name	State of Wisconsin, Wisconsin Department of Natural Resources		
Contact person	Mark Heyde		
Address	101 S. Webster Street	Telephone	608-267-0565
	P.O. Box 7921	Fax	608-266-8576
	Madison, WI 53707-7921	e-mail	Mark.Heyde@Wisconsin.gov
		Website	dnr.wi.gov

1.1.1.b FSC Sales Information

<input checked="" type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson			
Address	Telephone		
	Fax		
	e-mail		
	Website		

1.1.2 Scope of Certificate

Certificate Type	<input checked="" type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)		
Number of FMUs in scope of certificate		
Geographic location of non-SLIMF FMU(s)	<i>Latitude & Longitude:</i>	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is:	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac	
privately managed		
state managed	1,558,761	
community managed		
Number of FMUs in scope that are:		
less than 100 ha in area	338	100 - 1000 ha in area 322

1000 - 10 000 ha in area	91	more than 10 000 ha in area	11
Total forest area in scope of certificate which is included in FMUs that:			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
are less than 100 ha in area	33,363		
are between 100 ha and 1000 ha in area	296,110		
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0		
Division of FMUs into manageable units:			
Properties are divided into compartments and then into stands.			

1.1.3 Non-SLIMF Group Members

Name	Contact information	Latitude / longitude of Non-SLIMF FMUs	

1.2 FSC Data Request

1.2.1 Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	776,150
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	89,865
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	686,285
Silvicultural system(s)	Area under type of management
Even-aged management	
Clearcut (clearcut size range 1-263 ac)	259,557
Shelterwood	194,125
Other:	6,981
Uneven-aged management	
Individual tree selection	101,932
Group selection	123,690
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	23876 acres of all forest types (area control); see Appendix 1
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	192,877
Other areas managed for NTFPs or services	589,734

Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	Balsam boughs 5 tons; Christmas trees 500
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
Data are derived from "WisFIRS" which is a database that contains all recon, treatment, and timber sale data for State and County Lands.	
Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name)	
Aspen/Popple:	<i>Populus tremuloides</i> <i>Populus grandidentata</i>
Balsam poplar	<i>Populus balsamifera</i>
White birch	<i>Betula papyrifera</i>
Eastern Cottonwood	<i>Populus deltoides</i>
Swamp white oak	<i>Quercus bicolor</i>
Silver maple	<i>Acer saccharinum</i>
American elm	<i>Ulmus americana</i>
River birch	<i>Betula nigra</i>
Green ash	<i>Fraxinus pennsylvanica</i>
White oak	<i>Quercus alba</i>
Bur oak	<i>Quercus macrocarpa</i>
Black oak	<i>Quercus velutina</i>
Northern pin oak	<i>Quercus ellipsoidalis</i>
Black walnut	<i>Juglans nigra</i>
Butternut	<i>Juglans cinerea</i>
Shagbark hickory	<i>Carya ovata</i>
Bitternut hickory	<i>Carya cordiformis</i>
Black cherry	<i>Prunus serotina</i>
Red maple	<i>Acer rubrum</i>
Hackberry	<i>Celtis occidentalis</i>
Scotch pine	<i>Pinus sylvestris</i>
European larch	<i>Larix decidua</i>
Norway spruce	<i>Picea abies</i>
Eastern redcedar	<i>Juniperus virginiana</i>
Blue spruce	<i>Picea pungens</i>
Norway maple	<i>Acer platanoides</i>
Boxelder	<i>Acer negundo</i>
Black locust	<i>Robinia pseudoacacia</i>
Honey locust	<i>Gleditsia triacanthos</i>
Eastern Hophornbeam,	<i>Ostrya virginiana</i>
Ironwood	
Musclewood, Bluebeech	<i>Carpinus caroliniana</i>
Sugar maple	<i>Acer saccharum</i>
Yellow birch	<i>Betula alleghaniensis</i>
White ash	<i>Fraxinus americana</i>
American beech	<i>Fagus grandifolia</i>
American basswood	<i>Tilia americana</i>
Northern red oak	<i>Quercus rubra</i>
Northern white cedar	<i>Thuja occidentalis</i>
Balsam fir	<i>Abies balsamea</i>

<i>Eastern hemlock</i>	<i>Tsuga canadensis</i>
<i>Red Pine</i>	<i>Pinus resinosa</i>
<i>Jack Pine</i>	<i>Pinus banksiana</i>
<i>Eastern white pine</i>	<i>Pinus strobus</i>
<i>Black spruce</i>	<i>Picea mariana</i>
<i>Tamarack</i>	<i>Larix laricina</i>
<i>Black ash</i>	<i>Fraxinus nigra</i>
<i>White spruce</i>	<i>Picea glauca.</i>

1.2.2 FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough wood	Roundwood (logs)	4,796 MBF and 264,768 cds, all species
W1 Rough wood	Fuel wood	717 cds
W3 Wood in chips	Wood chips	6,294 cds and 500 tons
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
Plants and plant parts		N6.3.1 Christmas trees; balsam boughs

1.2.3 Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives		
High Conservation Value Forest / Areas		
High Conservation Values present and respective areas:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Code	HCV Type	Description & Location
<input checked="" type="checkbox"/> HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	<p><u>Driftless Area</u>: Large rivers, complex floodplains, sand terraces; Large Blocks of Southern Forest; Prairie & Savanna Remnants</p> <p><u>Northwoods</u>: Old-growth Developmental Stages HH and NH; Old-growth Developmental Stages Pines; Embedded Wetlands</p> <p><u>Glacial Outwash Plains & Lakebeds</u>: Xeric Pine-Oak Forests; Pine-Oak Barrens; Large Peatlands, Sedge Meadow, & Wetlands</p> <p><u>Lake Michigan</u>: Ridge & Swale Communities (inc. Lakeplain Prairie); Beach and Dune Formations; Level Bedrock Influenced Communities; estuaries, Green Bay</p>
		19,547

			<p>Marshes</p> <p><u>Lake Superior:</u> Freshwater Estuaries; Sandscapes; Dunes & Pine Forest; Boreal Clay Plain Forest; Apostle Islands Cliffs & Maritime Forest; Red Clay Wetlands</p> <p><u>Glaciated Southeast Wisconsin</u> Prairies, Fens, Savannas</p> <p><u>Niagara Escarpment:</u> Niagara Escarpment</p> <p><u>Ecological Landscape Features:</u> Central Lake Michigan Central Sand Hills Central Sand Plains Forest Transition North Central Forest Northeast Sands Northern Highland Northern Lake Michigan Northwest Lowlands Northwest Sands Southeast Glacial Plains Southern Lake Michigan</p>	
X	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.	<p><u>Driftless Area:</u> Large rivers, complex floodplains, sand terraces; Large Blocks of Southern Forest; Prairie & Savanna Remnants; Springs and Cold Water Streams; Cliffs, Caves and Talus Slopes; Relic Conifer Stands and Algific Slopes</p> <p><u>Northwoods:</u> Old-growth Developmental Stages HH and NH; Old-growth Developmental Stages Pines ;Embedded Wetlands; Biologically Rich Freshwater Lakes</p> <p><u>Glacial Outwash Plains & Lakebeds:</u> Xeric Pine-Oak Forests; Pine-Oak Barrens; Large Peatlands, Sedge Meadow, & Wetlands</p> <p><u>Lake Michigan:</u> Ridge & Swale Communities (inc. Lakeplain Prairie); Beach and Dune Formations; Level Bedrock Influenced Communities; estuaries, Green Bay</p>	104,162

			<p>Marshes</p> <p><u>Lake Superior:</u> Freshwater Estuaries; Sandscapes; Dunes & Pine Forest; Boreal Clay Plain Forest; Apostle Islands Cliffs & Maritime Forest; Red Clay Wetlands</p> <p><u>Glaciated Southeast Wisconsin</u> Prairies, Fens, Savannas, Kettle Moraine Forest, Emergent Marshes</p> <p><u>Niagara Escarpment:</u> Niagara Escarpment</p> <p><u>Ecological Landscape Features:</u> Central Lake Michigan Central Sand Hills Central Sand Plains Forest Transition North Central Forest Northeast Sands Southeast Glacial Plains Southern Lake Michigan</p> <p><u>Key Ecological Features:</u> Marl Lakes, Lower Wolf River</p>	
<input checked="" type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	<p><u>Driftless Area:</u> Large rivers, complex floodplains, sand terraces; Large Blocks of Southern Forest; Prairie & Savanna Remnants; Springs & Cold Water Streams; Cliffs, Caves, and Talus Slopes; Relict Conifer Stands & Algific Slopes</p> <p><u>Northwoods:</u> Old-growth Developmental Stages HH and NH; Old-growth Developmental Stages Pines; Embedded Wetlands; Biologically Rich Wild Freshwater Lakes</p> <p><u>Glacial Outwash Plains & Lakebeds</u> Xeric Pine-Oak Forests Pine-Oak Barrens Large Peatlands, Sedge Meadow, & Wetlands</p>	183,763

			<p><u>Lake Michigan:</u> Ridge & Swale Communities (inc. Lakeplain Prairie); Beach and Dune Formations; Level Bedrock Influenced Communities; Estuaries; Green Bay Marshes</p> <p><u>Lake Superior</u> Freshwater Estuaries; Sandscapes, Dunes & Pine Forest; Boreal Clay Plain Forest; Apostle Islands Cliffs & Maritime Forest; Red Clay Wetlands</p> <p><u>Glaciated Southeast Wisconsin:</u> Prairies, Fens, Savannas; Kettle Moraine Forests; Emergent Marshes;</p> <p><u>Wisconsin's Key Ecological Features</u> Marl Lakes; Lower Wolf River</p> <p><u>Niagara Escarpment:</u> Niagara Escarpment</p> <p><u>Ecological Landscape Features:</u> Central Lake Michigan Central Sand Hills Central Sand Plains Forest Transition North Central Forest Northeast Sands Northern Highland Northern Lake Michigan Northwest Lowlands Northwest sands Southeast Glacial Plains Southwest Grasslands Superior Coastal Plain Western Coulees & Ridges Western Prairie</p>	
<input type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		

<input checked="" type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	Driftless Area Northwoods Glacial Outwash Plains & Lakebeds Lake Michigan Lake Superior Glaciated Southeast Wisconsin: Niagara Escarpment	776
Total Area of forest classified as 'High Conservation Value Forest / Area'				308,248

1.3 Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> <i>N/A – All forestland owned or managed by the applicant is included in the scope.</i>		
<input checked="" type="checkbox"/> <i>Applicant owns and/or manages other FMUs not under evaluation.</i>		
<input type="checkbox"/> <i>Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.</i>		
Explanation for exclusion of FMUs and/or excision:	<p>The following DNR properties (about 130,599 acres) are excluded from the certification project:</p> <ul style="list-style-type: none"> • Agricultural fields (due to potential GMO issue) • Stream Bank Protection Areas (eased lands not under DNR management) • Forest Legacy Easements (eased lands not under DNR management) • States Fish Hatcheries and Rearing Ponds (intensive non-forest use) • State Forest Nurseries (intensive non-forest use) • Nonpoint Pollution Control Easements (eased lands not under DNR management) • Poynette Game Farm and McKenzie Environmental Center (intensive non-forest use) • Boat Access Sites (intensive non-forest use) • Fire Tower Sites (intensive non-forest use) • Radio Tower Sites (intensive non-forest use) • Ranger Stations (intensive non-forest use) • Administrative Offices and Storage Buildings (intensive non-forest use) • State Park Intensively Developed Recreation Areas (intensive non-forest use) e.g. Peninsula State Park golf course, Blue Mound State Park swimming pool 	
Control measures to prevent mixing of certified and non-certified product (C8.3):	Excised areas are not managed for timber and logs are not sold from these areas, thus there is no risk of mixing.	
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input type="checkbox"/> ac)

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1.4 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):	
353 male workers (Division of Forestry)	84 female workers (Division of Forestry)

1.5 Pesticide and Other Chemical Use



2012 Chemical Use.xls

1.6 Standards Used

1.6.1 Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard	1.0	July 2010
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSGlobalServices.com).		

1.7 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	To	multiply by
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft)	Meter (m)	0.3048
Yard (yd)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	To	multiply by
Square foot (sq ft)	Square meter (m ²)	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	To	multiply by
Cubic foot (cu ft)	Cubic meter (m ³)	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

2. Description of Forest Management

2.1 Management Context

2.1.1 Regulatory Context

<p>Pertinent Regulations at the National Level</p>	<p>Endangered Species Act Clean Water Act (Section 404 wetland protection) Occupational Safety and Health Act National Historic Preservation Act Archaeological and Historic Preservation Act Americans with Disabilities Act U.S. ratified treaties, including CITES Lacey Act Forest Resources Conservation and Shortage Relief Act National Resource Protection Act National Environmental Protection Act National Wild and Scenic River Act Native American Grave Protection and Repatriation Act Rehabilitation Act Architectural Barriers Act</p>
<p>Pertinent Regulations at the State / Local Level</p>	<p>Statutory authority to engage in forest certification (broadly interpreted): §§23.11, 28.01, 28.07, and 77.80 DNR Manual Codes and Handbooks Wisconsin Pesticide Law (Chapter 94, WI Statutes) Use of Pesticides on Land and Water Areas of the State of Wisconsin (WI Administrative Code, Chapter NR 80) Wild Animals and Plants Law (Chapter 29, WI Statutes) and WI Administrative Code NR 10 Wisconsin Water Law: UW Booklet Wisconsin Groundwater Law (Chapter 160, WI Statutes) Navigable Waters (Chapter 30, WI Statutes) Water Quality Standards for Wetlands (Chapter NR 103, WI Administrative Code) Wisconsin Shoreland Management Program (Chapter NR 115, WI Administrative Code) Endangered and Threatened Species (Chapter NR 27, WI Administrative Code) Wisconsin Historic Preservation Laws</p>

Regulatory Context Description

(Adapted from the 2008 Full Evaluation Report)

In 1967, the Wisconsin Legislature created the Department of Natural Resources. The Department coordinates the preservation, protection and regulation of the natural environment for the benefit of the people of Wisconsin and its visitors. Included in its responsibilities are water and air quality protection, water supply regulations, solid and hazardous waste management, contamination cleanup, protecting biodiversity, fish and wildlife management, forest management and protection, providing parks and outdoor recreation opportunities, lake management, wetland, shoreland and floodplain protection, and law enforcement.

The Department also coordinates federal, state and local aid programs of the U.S. Fish and Wildlife Service, the U.S. Forest Service, the Environmental Protection Agency and other federal agencies and administers federal funds available for outdoor recreation, thereby taking a lead role in planning state outdoor recreation facilities. It administers state aid programs for local outdoor recreation and pollution abatement.

The Department is a cabinet agency, with the Secretary and a citizen Board appointed by the Governor and confirmed by the Senate. The Secretary is the Department's chief executive officer, and the seven-member citizen Natural Resources Board directs and supervises the Department.

The Wisconsin Natural Resources Board sets policy for the Department of Natural Resources and exercises authority and responsibility in accordance with governing statutory provisions. Chapter 15 of the Wisconsin Statutes delineates the formal duties of the seven-member board. Board Members are appointed by the Governor with the advice and consent of the State Senate. Three members each must be selected from the northern and southern portions of the state and one member serves "at large."

2.1.2 Environmental Context

Environmental safeguards:
<p>Revisions to the Wisconsin Best Management Practices took effect in 2011; these specify additional protection for all wetlands, particularly seasonal wetlands, many of which are small but some of which are ecologically significant; foresters and loggers are aware of these provisions and work to implement them. Sale and/or harvest unit boundaries are designed to avoid or buffer wetlands, stream, lakes, and other water bodies. Riparian buffers associated with harvests are shown on maps and marked on the ground. Field audits in 2013 confirmed that foresters are knowledgeable of BMP requirements to protect riparian zones and are doing an excellent job of implementing them on harvest sites.</p> <p>Water quality considerations including lakes or rivers potentially affected by the harvest are documented for each proposed harvest on Form 2460, and this information is reflected in the harvesting requirements within the timber sale contracts. Timber harvest planning considers weather events, with some sites on dry sands intended for the wet time of year, other sites identified for only dry weather, and other sites only for frozen ground. Furthermore, the Wisconsin "Forestry Best Management Practices for Water Quality" contains excellent written guidelines for controlling erosion and protecting water and wetlands.</p>

Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:

DNR has a thorough process for addressing the management of RTE species. Prior to master planning, Rapid Ecological Assessments are conducted by ecologists from the Bureau of Natural Heritage Conservation. Thus, any RTE species known to the ecologists or documented in the survey is considered in the planning process. In addition, any planned harvesting activity is reviewed by representatives from all relevant divisions of DNR, and Natural Heritage Inventory databases are referenced. Interviews with a number of NHC ecologists during field visits revealed descriptions of numerous surveys designed to assess rare species and important indicator species. Along the Mississippi River corridor birds have been monitored to assess importance of blocks of mature forest for migrants. An ongoing survey project, conducted jointly by DOF and NHC, involves a survey of ephemeral ponds.

If a rare ecological community is present, it is identified in the state's NHI database, at which point the land manager consults with an ecologist in the Bureau of Natural Heritage Conservation to develop appropriate management options. More commonly, rare communities are already identified and may be part of an SNA, with a management plan developed to feature a viable community.

2.1.3 Socioeconomic Context

(Adapted from the 2008 Full Evaluation Report)

Timber production and tourism contribute significantly to the state's overall economy.

As of 2012, forest products in Wisconsin accounted for 12% of the value of all shipments, as well as 14% of jobs and 13% of wages in the manufacturing sector. Over 60,000 people are employed in the forest products sector state wide (mostly in paper manufacturing), across approximately 1,271 businesses in the forest products industry and another 278 in the logging and forestry support sectors. The average wage is \$42,600 and total wages contribute \$3.0 billion per year to the state economy.

((<http://dnr.wi.gov/topic/ForestBusinesses/documents/WisconsinForestProductsIndustry.pdf>, accessed 10/22/13)

Since 2002, total wages for the industry have decreased 38% (adjusted for inflation). Paper mills have been the largest contributor to this decline, from \$1.9 billion in 2002 to less than \$900 million in 2012, a decrease of 53%. However, total wages for the wood furniture manufacturing sector has increased by 37% in the same period.

(<http://dnr.wi.gov/topic/ForestBusinesses/documents/WisconsinForestProductsIndustry.pdf>, accessed 10/22/13)

Despite these declines in the forest products sector, the benefits of certification are still applicable. Benefits include strengthened marketability of products and retention of manufacturers who are actively seeking certified forest products. The assessment and auditing process also provide beneficial opportunities to identify potential challenges and solve problems that results in continual performance improvements. The social benefits of certification include improved public support and reduced controversy related to land management activities.

2.1.4 Land use, Ownership, and Land Tenure

(Adapted from the 2008 Full Evaluation Report)

The scope of the certificate includes state forests managed for diverse forest-based uses as well as Land Division properties that provide significant socioeconomic benefit. These property types include: State Parks, Wildlife Areas, Recreation Areas and Trails, Fisheries Areas and Natural Areas, Natural Resource Protection and Management Areas, Lower Wisconsin Riverway, State Wild Rivers, State Owned Islands and Stewardship Demonstration Forests.

Recreation is one of the primary uses of the State Forests with over two million visitors annually on the Northern Highland/American Legion State Forest alone. Hunting, hiking, boating, fishing, camping, cross country skiing, and snowmobiling are examples of popular recreational activities that occur on state lands. Wisconsin households spend over \$5.5 billion per year on goods and services associated with forest-based recreation.

Wisconsin is expecting a 6.8% increase in the state’s adult population by 2025. This population growth is expected to increase demands for recreation opportunities and pressures on competing land uses. The age of Wisconsin residents is expected to shift in coming years with 20% of the population being over the age of 65 by 2030. This demographic trend is anticipated to have impacts on land use decisions. Wisconsin is also becoming more culturally diverse and more urbanized.

2.2 Forest Management Plan

Management Objectives:

(Adapted from the 2008 Full Evaluation Report)

The WDNR uses a Property Master Planning process to determine how a property will be managed and developed. By administrative code the master plan is the controlling authority for all actions and uses on a property. The development of master plans is governed by Chapter 44 (Natural Resources) of the Wisconsin Administrative Code--the master planning rule. This rule defines master planning; sets forth its purposes, specifies the general planning process and the content of a master plan.

The master planning handbook supports and supplements NR 44 by providing additional guidance on master planning policies, process, required data, document content, planning team structure and function, and citizen involvement. Further, it is intended to aid achieving an appropriate level of consistency in plans across all Department programs. The handbook was developed by the Bureau of Facilities and Lands, Planning and Land Management Section, which has administrative responsibility for the Department’s property planning program.

The purposes of the master plan and planning processes include the management of resources on Department properties in accordance to land use capabilities, consistent with the long-term protection and use of these resource, as required by NR 1.60(4). The plans also provide the basis for decision-making consistent with the Wisconsin Environmental Policy Act (WEPA).

Forest Composition and Rationale for Species Selection:

Wisconsin’s forest resources are divided into two broad categories, the Northern Mixed Forest and the Southern Broadleaf Forest. These two overall forest types exist in Wisconsin because of the differences in the soil types and climate that support them and to which they have adapted over thousands of years.

These two regions meet in an area called the tension zone. The tension zone stretches across Wisconsin

from northwest to southeast in an S-shape. The tension zone forms the northern boundary of many species' ranges, both plant and animal. The tension zone is a diverse area, where representative plant and animal species from both the Northern Mixed Forest and the Southern Broadleaf Forest types can be found, and a significant shift in vegetation occurs.

The most abundant forest types in Wisconsin are hardwood forest types. Maple-basswood, aspen-birch, and oak-hickory are the most common. Maple basswood accounts for 5.3 million acres, followed by aspen-birch forest type with almost 3.4 million acres, and oak-hickory with about 2.9 million acres. While 84% of Wisconsin's forests are hardwood types, there are also significant softwood types occupying large areas, especially in the north. Red pine, jack pine, black spruce, northern white cedar, and tamarack are the most common conifer forest types.

(<http://dnr.wi.gov/files/pdf/pubs/fr/FR0161.pdf>, pages 8-9, accessed 10/22/13)

General Description of Land Management System(s):

(Adapted from the 2008 Full Evaluation Report)

DNR has developed a Silviculture and Forest Aesthetics Handbook to guide management treatments on the major forest cover types in Wisconsin. The ecological characteristics and recommended silvicultural practices and systems for each cover type are described in sufficient detail to support operational planning. Additional silvicultural information can be obtained by referring to the list of publications at the end of each chapter. The Forest Aesthetics portion of the Handbook contains a compilation of management considerations and techniques that may be used to modify silvicultural practices in order to accomplish desired aesthetic management objectives. Typically, the silvicultural guidelines are written to encourage a stand containing the greatest quality and quantity of timber while recognizing the short term and long term impacts of silvicultural activities, and land management responsibilities. A stewardship ethic is fostered to encourage vigor within all developmental stages of forest stands, managed in an evenage or unevenage system. The guidance in the Handbook applies to all forest properties owned by the Wisconsin Department of Natural Resources. Department personnel and cooperating partners will follow the management alternatives outlined in this Handbook, unless the approved property management plan makes an exception, or in the judgment of the forester, a variance from these guidelines is warranted and can be documented to the satisfaction of the Department.

Harvest Methods and Equipment used:

(Adapted from the 2008 Full Evaluation Report)

Clearcut, shelterwood, group and individual tree selection are all employed with standard forestry field operating equipment and machinery.

Explanation of the management structures:

(Adapted from the 2008 Full Evaluation Report)

The Department is organized with a headquarters office in Madison, five regional offices and over 200 other field stations and offices. The central office staff assists the Secretary in developing policy and directing the implementation of Department programs in the regions, which carry out the field operations of the Department. Over 70% of the Department's personnel operate from five Regional Headquarter offices and from field stations throughout the state.

The Department is organized into programs and subprograms to facilitate the accomplishment of its mission. Seven divisions established in statutes -- Land, Forestry, Air and Waste, Enforcement and Science, Water, and Customer and Employee Services -- have primary responsibility for the Department's program.

The Land and Forestry Divisions have lead responsibilities for the lands included within the forest certification assessment. The Enforcement, Science, and Water Divisions also have roles and responsibilities related to state lands management.

The Land Division plans and directs activities that include developing and maintaining game and nongame wildlife populations; coordinating long-range programs of management and protection for endangered resources; and providing necessary acquisition, development and operations for statewide recreational and conservation activities within parks, southern forests, wildlife lands, scientific areas and natural areas.

The Forestry Division is responsible for the administration of the development and implementation of a balanced management and protection program for the state's forest resource.

2.3 Monitoring System

Growth and Yield of all forest products harvested:

Wisconsin Forest Inventory Reporting System (WisFIRS), Public Lands Handbook chapter 100

The main timber inventory is done through forest compartment reconnaissance (recon). Recon is a stand level assessment used to populate the Wisconsin Forest Inventory Reporting System (WisFIRS). Plots include measurements of species, volume (merchantable log tally and basal area reading), stocking, site index, timber quality, and general forest conditions.

Recon is done on an as needed basis depending on several triggers (timber sale establishment, closeout, land acquisition, etc.) but no longer than every 15 years on state land.

DNR has also started a Continuous Forest Inventory system on state forests only. Started in 2007, the first 5 year report has been completed, "Wisconsin Continuous forest Inventory Report." The CFI system captures more in-depth information than the recon, but is done on an annual basis for a smaller area.

Forest dynamics and changes in composition of flora and fauna:

Auditors visited numerous sites where management activities were designed to maintain or restore under-represented forest types or age classes. On an experimental basis, some stands are being managed to accelerate old-growth forest structure. Active burning programs in SNAs are implemented to maintain open wetland and barrens type habitats. DNR also cooperates with the USFWS to shear decadent alder habitat to provide early successional habitat for wildlife species (American woodcock and golden-winged warbler). Management prescriptions for sites visited in 2013 were consistently written to enhance or maintain current or desired composition of plant species on the site. Selective management techniques such as controlled burning and use of herbicides are commonly employed.

Environmental Impacts:

Form 2460s present methods to avoid negative environment impacts and to enhance the long-term viability of the forest. Where master plans have not been prepared or are out of date, a number of guidance handbooks (e.g., silviculture handbook, old-growth handbook) and other documents assure

conformance when used a guides for field prescriptions.
Social Impacts:
DNR has staff sociologists dedicated to understanding the social impact of forest management. The Wisconsin Environmental Policy act requires an evaluation of social impacts, including historic, cultural, scenic, and recreational resources. Archeological sites are mapped in state database and protections measures are put in place prior to activities beginning.
Individual master plans include discussion of social impacts as part of a regional property analysis.
Costs, Productivity, and Efficiency:
Although financial return is not the primary motivation of the state agency, revenue and costs are tracked and detailed as part of standard financial record keeping.

3. Certification Evaluation Process

3.1 Evaluation Schedule and Team

3.1.1 Evaluation Itinerary and Activities

Date: August 18, 2013, Sunday	
FMU / Location / sites visited	Activities / notes
<i>Auditor Mike Ferrucci</i>	
Buckhorn State Park	Meet with park staff; inspect shop and operations; visit beach and day-use areas, campsites, and a new campground location.
Buckhorn Wildlife Management Area	Field visit to inspect co-management of a natural area and wildlife management; examine forest and vegetation management.
Devil's Lake State Park	Meet with park staff; inspect day-use areas on north shore and south shore, campgrounds, and Ice Age trail. Also visit forest management site.
Date: August 19, 2013, Monday	
FMU / Location / sites visited	Activities / notes
State Natural Resources Building, Madison	8-9: Opening meeting (entire audit team)
	9-10: Interview with planning staff (entire audit team)
	10:15-10:45: Interview with inventory and monitoring staff (entire audit team)
	10:45-11:30: Interview with wildlife management staff (Capen and Grady)
	10:45-11:30: Interview with silviculture and timber sale staff (Ferrucci and Boatwright)
	11:30-12:00: Interview with trails and recreation staff (Capen and Grady)
	11:30-12:00: Interview with hydrology staff to discuss water quality BMPs (Ferrucci and Boatwright)
	1:00-1:30: Interviews with legal and tribal relations staff (Capen and Grady)
	1:00-1:30: Interview with forest health staff (Ferrucci and Boatwright)
1:30-2:00: Interview with outreach staff (Capen and Grady)	

	2:15-2:45: Interview with cultural and historic site staff (Capen and Grady)
	2:15-2:45: Interview with pesticide use team (Ferrucci and Boatwright)
	2:45-3:15: Interview with law enforcement personnel (Capen and Ferrucci)
	2:45-3:15: Interview with forest research staff (Ferrucci and Boatwright)
	3:15-4:00: Interview with natural heritage personnel (Capen and Grady)
Date: August 20, 2013, Tuesday	
FMU / Location / sites visited	Activities / notes
Auditors Capen and Grady Lower Wisconsin State Riverway	
Tower Hill State Park	Meet with DNR staff involved in the management of a landscape comprised of a mix of state and private lands protecting a variety of unique resources in the Riverway, part of the state's Driftless region. The management area contains numerous historic and pre-historic artifacts, important habitat for migrating birds, and a long list of rare plant and animal species.
Leone Road Timber Sale	Recently completed harvest of a 20-acre red pine plantation that was beginning to decline rapidly. Initial plan was for a thinning, but bark beetle damage was so obvious, that the entire stand was cut. Abundant advanced regeneration and seed sources, for a mixed stand of white pine and several species of oaks. Flat, sandy soils with no sign of damage by the harvest crew. Access points blocked by soil berms. Timber Sale Prospectus reviewed by auditors.
Monument Oak Sale	Thinning with regeneration patches; harvest finished almost 3 years ago. Forest understory is dense, with and little evidence of 2010 harvest. Site inspection involved the upland part of the harvest; bottomlands were also part of the sale, but wet conditions prevented the planned cutting. A very diverse area with numerous rare species and associated conditions specified in the Timber Sale Prospectus.
Lemanski Bottoms Timber Sale	This bottomland hardwood tract was fully stocked with a large component of silver maple, swamp white oak, river birch, green ash, and other miscellaneous hardwood species. The goal for this stand is to maintain a significant component of swamp white oak while maintaining bottomland hardwoods. Different objectives for regeneration in patch cuts of different sizes, filtered light versus stronger light. Form 2460 indicates that rare species and historical artifacts may be found on the site, thus logging equipment was restricted to periods when ground was frozen.
Prehistoric Effigy Mound	Effigy Mound shaped like Twin Eagle, recently discovered by forestry technician. DNR has detailed policy and procedures for the protection of such sites, and foresters were familiar with the

	guidelines (Burials, Earthworks, and Mounds Preservation Policy and Plan).
Hogback State Natural Area	Hogback Prairie is found on a narrow, steep-sided limestone-capped ridge that rises 300' above a former oxbow of the nearby Kickapoo River. A mix of rare plants and invertebrates is found here, including the Regal Fritillary Butterfly and the associated Hill's Thistle. Management activities include a recent timber sale to restore prairie vegetation, controlled burning, planting locally collected seeds, grazing by goats, and use of herbicides to combat brush. Some of the acreage is allocated to share-cropping, with conditions on use of chemicals and crops grown. Form 2460 and the Timber Sale Prospectus were reviewed.
Battle Hollow State Natural Area	Battle Bluff Prairie SNA contains southern dry forest and a south-facing dry prairie on a steep slope. The diverse prairie flora is interspersed with limestone boulders, sandstone outcrops, and a few stunted trees. More than 80 species of native prairie plants have been identified. On the top and at the bottom the prairie gives way to forest dominated by oaks, birch, and basswood. Inspected a marked sale of oak and walnut, with the objective of restoring and maintaining oak savanna. Form 2460, Timber Sale Prospectus, and the Interim Forest Management Plan were reviewed by auditors.
Auditor Mike Ferrucci	
Jennings Creek Wildlife Area	
2008 Oak Salvage	Stand was defoliated in 2002 by Gypsy moth and was sprayed as part of a large block. Oak wilt has been impacting this stand since, with numerous dead and flagged oaks indicating an active oak wilt problem. Salvage harvest conducted in 2008. Foresters intend to consider this stand for a sanitation harvest. Observed good oak regeneration and discussed regeneration monitoring.
Sale # 1-10	26 acres completed thinning in a red pine plantation that is somewhat off site/at southern edge of its range, and recovering from drought and overstocking. Buckthorn is growing throughout the understory, but there are no present plans to control
Rocky Run Creek Fishery Area	
SNA habitat management	Savanna and grassland management for 2 rare reptile species. The significant and very successful restoration project spanning over ten years has removed most invasive species, reintroduced fire, achieved desired forest structure, and increased target populations. Monitoring of this HCVF site includes "Rapid Ecological Assessment" (biological inventory) done prior to the Master Plan and to be repeated every 15 years as part of the master planning cycle, annual population surveys for the two rare species, periodic review of site for invasives, and a broader, formal site monitoring review done by staff from Madison on a three-year rotation.
Sale # 1103-410 North	Red Pine thinning and salvage. 58-year old red pine plantation which has had pocket decline salvaged in 2000 and thinned again in 2011 (more heavily than normal in this area) to release spruce and oak

	understory and in one clearcut area. Walked through an untreated field of spotted knapweed; other areas closer to the SNA have been treated by release of bio-control agent.
Sale # 1103-410 South	This part of the stand is heavily infested with buckthorn.
Dekorrra Public Hunting Ground	
Sale # 1-11	Oak harvest on 45 acres to create savanna and oak woodland. The harvest is nearly complete, but was halted last winter due to weather and hunting activity. The Oak Savanna Guidelines were used help plan the treatment. Sale documents describe seasonal limitations to prevent injury to a rare turtle; discussed the process for reviewing NHI records and records of historical and archeological sites. Discussed in detail sale administration and the rutting standard. Contract included BMP requirements, the rutting standard, training requirements for loggers, and specifications for utilization.
Pine Island Wildlife Area	
Tritz Road Planting Site	Plantings to convert sharecrop fields to forest: Machine planted White Oak (driest part), Bur Oak, and Swamp White Oak (wettest areas) during April 2010. Despite flooding that submerged the site for many weeks soon after the survival and growth rates were impressive, and the stand is fully stocked and established.
Savanna management Site	Viewed briefly from edge, the stand was thinned/salvaged to restore a previously degraded savanna, based on pre-harvest assessment which found many remnant prairie plant species.
Grassland Management Area	
Sale# 2-11, Blount Rd aspen regeneration	50 acres clearcut with oak reserves, for woodcock management, with 2 acres of uncut reserves. Foresters reported that there were some impacts to access haul road, but the site had re-vegetated and it is not clear that any remediation is needed. Aspen root suckers were sufficiently robust and prolific to comprise successful regeneration.
Prescribed burns	Windshield view of several successful burn restoration areas.
Auditor Norman Boatwright	
Waterloo Wildlife Area	
Sale No. 3-08 I	17-acre partial harvest in a mixed oak hickory and cherry stand with aspen along the edges. Objective was to remove over mature black oak, leaving white and bur oak and remove all aspen. White and red oak seedlings were planted after the harvest (reviewed planting record which contained initial stocking count). Good residual stocking and aspen regeneration.
Sale No. 3-08 II	19-acre partial harvest to remove box elder and elm with an aspen clearcut release along the edges. Good discussion regarding marking strategy.
Prescribed burn units	Bluejoint area: 5- acre burn in spring of 2013 to encourage open grassland. Review of the approved prescribed burn proposal indicates it addresses the appropriate issues including a map and an Endangered Resources Review documentation.

Lake Mills Wildlife Area	
Sale No. 5-08	17 acre summer aspen clearcut with box elder and some cherry removal. Good aspen regeneration
Dike renovation at Zeloski Marsh Unit	Includes resurfacing dikes in this unit. Project was administered by DNR engineers and completed in the summer of 2013. Really nice marsh with several flowage control devices.
Rome Pond Wildlife Area	
Texas Island timber sale	76-acre initial entry sale; marking is not complete so no sale #. Very unique geomorphic area with a large elevated island in the middle of a large marsh accessed by an elevated road. Sale area is a mature hardwood forest dominated by red and white oak, shagbark hickory and sugar maple. Timber stand improvement marking was appropriate and included removing ash, basswood, some white oak and mixed hardwood
Kettle Moraine State Forest, Southern Unit	
Sale No. 114	88-acre 2 nd thin red pine plantation with little damage to residuals and 110 sq ft basal area remaining. A second parcel in the same sale was a 5-acre black locust harvest and mulch with a spray planned for next summer.
Sale No. 124	126-acre 2 nd thin red pine plantation with little damage to residuals. Nice horse trail.
Sale No. 129	First parcel visited was a 9-acre locust treatment and TSI harvest leaving oak and cherry. Will be treated and planted next year. A second parcel in the same sale was a timber stand improvement cut in a nice cherry stand with minimal residual damage
Sale 126	121 acres marked red pine but not yet cut. Marking is fine.
Paradise Springs	Beautiful natural spring that was previously a resort (buildings long gone). Nice paths, benches and educational items.
Date: August 21, 2013, Wednesday	
FMU / Location / sites visited	Activities / notes
Auditors Capen and Grady	
Coulee Experimental Forest	State forest, established originally as agriculture research station with some experimental tree plantings. State assumed management in 80s. Plot data is maintained, but there has been little active research in past 10 years.
Sale 3213-28	Demonstrated early attempt at managing oak – shelterwood installation cut. Conversion of central & northern hardwoods/thinning to promote vigorous oak, regenerated oak area. Discussed reserve area, restrictions on equipment operability
Sale 3213-27	First thinning of red and white planted pine stands. Method was row thinning. End goal for legacy planted pine areas is to manage to rotation length and then convert back to northern hardwoods. Adjacent aspen stands were cleared in order to regenerate through coppice method.

	<p>Harvest included dry bluff prairie area (a globally rare community), removal of pine plantations and prescribed fire used to promote prairie system.</p> <p>Inspected road work, discussed rutting road BMPs.</p>
Sale 3213-26	First thinning of pine stands (row thinning). Sale interrupted due to steep slope, logger needs to return with hand fallers.
Wildcat Mountain State Park	State park, primary recreation activities are canoeing on Kickapoo river, horseback riding, camping, etc. contains embedded hemlock state natural area
Sale 6339-001	Thinning of red pine plantation. End goal for pine is to phase out and replace with native hardwoods. Discussed temporary stream crossing installation (pvc pipe and temporary bridge system). Reviewed culvert replacement work (mixed results)
Coon Creek Fishery Area	Fishery management area, mix of fee, easement, and leased land on creek.
Sale 6304-2	Innovative riparian zone management project. Removal of bottomland hardwood along stream zone in order to daylight stream. Limiting factor for fish production in the system is sunlight for plant productivity, not temperature. Installation of artificial banks, overhangs, in stream structure, etc. to create runs, riffles, pools.
Auditor Mike Ferrucci	
Black River State Forest	
Sale 1130, Shale Road Oaks I	Stand 2 is a recently completed shelterwood/heavy seed tree harvest in and oak-dominated stand with scattered white pine trees mostly less than 15-feet tall. The objective, driven by landscape-level goals, is to regenerate a similar stand. Before the harvest the site was “dozer-scalped” to create favorable seedbeds for oak and to eliminate much of the encroaching white pine. Oak seedlings are present throughout the site, many in portions of the scalps where there is a mixture of organic matter and sandy soil.
Hilltop view	Discussion of landscape management
Sale 1130, Shale Road Oaks II	Stand 3: This area was recently completed. The forester pointed out that she had marked to achieve a “stocking gradient” from more open towards the rear of the sale to less-heavily cut towards adjacent “native Community Management Area” across forest road.
Sale 1141, Oak Clearcut Unit	This active sale within the Outermeyer Hills Recreation Area has a prescription of clearcut with marked retention. Silviculture, retention, soil protections, and contract terms were confirmed. The buyer and operator is Delaney Forest Products; interviewed Gary Nemitz, Forwarder Operator and NAME, processor operator. Neither is current with their FISTA training; the supervising forester explained that the WDNR attorney told her that the trained person needs to be identified in association with the company that signs the

	<p>contract.</p> <p>When we arrived on the site the forwarder was parked in the landing. The loading arm was not operational. There had been an incident where fluid had sprayed onto the ground and onto the machine, and the hoses in the grapple area were still leaking hydraulic fluid very slowly. No spill kit was present on site.</p> <p>Minor Non-conformance 2013-01: The auditor observed an on-going, minor leak of hydraulic fluid from the loader arm of the forwarder (initial spray onto ground and onto rear of forwarder. Two mechanics arrived with a spill kit at least 40 minutes after the auditor arrived on site (unknown how much time elapsed between the leak and the arrival of the auditor).</p>
Sale 1156, Timberdoodle Pine	<p>This sale includes white pine thinning, jack pine release, and jack pine clearcut areas and is partly complete but was not active during the visit. We reviewed two different areas of white pine thinning (main canopy) and release (saplings in understory) and Wisconsin DNR foresters discussed the prescription and the challenges of variable stand and site conditions.</p>
Sale 1150 Hableman Red Pine Thinning	<p>The red pine plantation, while adjacent to a barrens management area, was conventionally thinned. The district ecologist had advised this approach, correctly predicting that the treatment would be sufficient to further encourage the development of some prairie plants in the understory.</p>
Stand 13 Barrens Management Area	<p>This stand is within the “Forest Production Area” of the forest. Old records indicating the presence of Karner Blue Butterfly, the presence of several types of some prairie plants in the understory, and the forester’s ability to market some of the overstory, very poor-quality oaks led to a decision to conduct a restoration harvest. Large, merchantable white pine were also sold, and funding was secured for control of undesirable understory. The district ecologist pointed out prolific prairie plants and declared the area to be the “best barrens restoration opportunity on the entire Black River State Forest.</p>
Meadow Valley Wildlife Area	
Sale 882	<p>This site was a completed aspen clear cut with retention intended to regenerate early successional forest. The timber sale narrative is clear and complete, including explicit desired future condition, “regeneration of all species currently present”, that appears to be met. The adjacent marsh, crossed during the harvest to access timber from the furthest portion of the harvest unit, was protected from damage by harvesting when the ground was frozen.</p>
Silver Creek Barrens Management	<p>Observed and discussed from vehicle, the goal is to create and maintain 1,000 acres of barrens habitat in a 10,000 acre portion of Meadow Valley WMA in keeping with the role as a recovery property for Karner Blue Butterfly. Methods employed included harvesting commercial forest products, mowing, herbicide treatments, and burning, in various combinations.</p>

Sale 875	This completed thinning of mature natural pine (Stand 1) and regeneration harvest (clearcut with reserves, Stand 2) has excellent post-harvest conditions matching prescriptions and relevant silvicultural guidelines.
Tract 13-12	This planned (marked) regeneration harvest & pine thinning was similar to Site 11 before that harvest.
Leola Marsh	Prairie Chicken management is the primary objective here. Site #1: Grazing area to manage habitat and set back brush Site #2: Forest stand discussed; too difficult to convert to open habitat Site #3: Recently-acquired 40-acre tract, planted for permanent cover Site #4: Planted Strips of sunflower, food for the Prairie Chicken Site #5: Leased hay cutting area, strict protocols enforced to protect the associated listed plants in prairies, grasslands, and savannas. Discussed the “General Protocol for Incidental Take Authorization”. Prescribed burning, mowing, grazing, selective brush/tree cutting, and herbicide use are all carefully restricted.
Auditor Normal Boatwright	
Vernon Wildlife Area	
Sale No. 6809-3	12-acre locust harvest, treatment and hardwood planting combined with a larger timber stand improvement cut to create an oak savannah. Also observed a successful prairie grass conversion
Sale 6809-2	Northern hardwood selection harvest adjacent to the Fox River dominated by red maple and ash. Nice marking effort geared towards creating an all-aged stand of shade tolerant trees. No issues.
Kettle Moraine State Forest, Southern Unit	
Sale No. 116	120 acre red pine 4 th thin with little damage to residuals.
Sale 115	70-acre oak shelterwood cut with small aspen clearcuts. Buckthorn was sprayed prior to harvest. Logger left due to long skids. Good marking effort.
Scuppernog River Habitat Area	Beautiful restored prairie. Buckthorn was mechanically removed 8 years ago and, because the area had never been tilled, it reverted back to prairie.
Nelson Farm	Agricultural field planted in oaks and cherry 2 years ago. Banded with Oust. Good survival. Another portion was planted to prairie with success.
Sale No. 118	Large red pine 3 rd thinning with some hardwood removal, mostly ash and box elder. Well-marked sale with minimal residential damage
Sale No. 127	63-acre 2 nd red and white pine thin not yet cut. Marking looks good with adequate residual stocking.
Sale No. 125	16-acre red pine salvage in several blocks. DRN marked dead and dying timber. No issues.
Sale No. 129	Two parcels, not yet harvested. Locust girdled and sprayed. Will be

	mulched, sprayed and planted next year.
Pinewood Campground	Nice area dominated by red pine with showers, bathrooms and water.
Milwaukee Public School Farm	Working farm with crops, sheep, horses and cows. Run by the Milwaukee Public Scholl system. DNR charges nothing and the school system maintains the buildings.
Ottawa Lake Campground	Nice lake with beach, boat landing, RV hookups, campsites and cabins for terminal patients.
Date: August 22, 2013	
FMU / Location / sites visited	Activities / notes
Auditors Capen and Grady	
Kickapoo Wildlife Area— Wauzeka Unit	Parking lot discussion of management goals for Kickapoo Wildlife Area. Mature stands of oaks and northern hardwoods support the importance of this area for migratory songbirds. Wildlife managers would also like to see aspen promoted where appropriate.
Cornfield timber sale	Auditors inspected a 46-acre sale marked for harvest. The stand is about 75% mature aspen, but will be managed to create some openings in the canopy to encourage aspen regeneration while maintaining mature oaks and other hardwoods. The stand is relatively free of invasives, and measures will be taken to avoid introducing seeds from elsewhere. Forester noted numerous snags and cavity trees in the stand, which will be maintained.
Lower Wisconsin State Riverway	
Gotham Sands State Natural Area	Tract 2-11, a low-productivity oak stand where the goal is to remove most of the tree cover, leaving only marked trees, and use prescribed fire to encourage a pine barrens community consisting of black oak, jack pine, and a native prairie plant community. Current conditions is an open stand with dense Pennsylvania sedge a the dominant ground cover. The property is adjacent to a residential neighborhood, so prescribed burning will require good relationships with neighbors.
Gotham Sands State Natural Are	Tract 5-06, is a 10-acre plantation of red pine that will gradually be thinned. The long-term goal is to convert to a native forest community. The stand was marked initially in 2006, but access became an issue that is now in place.
Lone Rock Pine	73-acre restoration of an oak-pine barrens. The harvest has been advertised for biomass cutting, leaving only marked tree and taking all fine materials off site. This site is the subject of detailed pre-harvest monitoring of birds, mammals, and herps. Post-harvest surveys will continue, in an effort to document response to restoration of the barrens. This is an area of heavy recreations, so measures are proposed to prevent ORV use.
Lone Rock Pine	Tract 10-13. This tract involves two small parcels surrounded by other ownerships and adjacent to a recreation path. An 8-acre parcel of red pine will be removed to release a mix of oaks and white pine that are in the understory. A smaller parcel nearby is a red pine plantation that will be thinned, but the goal is to convert to white

	pine eventually.
Lone Rock Pine	Highway 14 Bottomland forest, 8-07. This is a 250-acre stand where marking was initiated in 2008, but the harvest was later classified as “deferred.” A red-shouldered hawk nest and an adjacent SNA if similar forest initiated discussion that led to a decision to wait until Master Planning was completed. Migratory birds are a major concern in this location along the Lower Wisconsin River.
Auditor Mike Ferrucci	
White River Marsh	<p>Topics: Wetland management; Whooping crane reintroduction efforts; HCP for Karner Blue Butterfly (this property is a recovery property)</p> <p>Site 1: Parking Area; SNA Southern Sedge Meadow Large SNA, portion adjacent to road is not representative, so did not walk.</p> <p>Site 2, Sale # 3972-01, Flowing Well Timber Sale Sold, uncut planned harvest. Reviewed treatment area for KBB habitat development. Stands 2, 6, and 7 (31 acres) will have a heavy harvest to remove most of forest except 5-6 scattered, open-grown white oak per acre and to leave 20% canopy closure. Discussed briefly a 114-acre oak regeneration treatment in Stand 28 which is included in the same sale and is not cut yet either.</p>
Mecan River Fisheries Area	
Sale # 7059-80, Fat Squirrel Timber Sale	Closed timber sale completed by Weekly Timber and Pulp. Interview with Andrew Kommassq, Procurement Forester confirmed that he and all members of the harvest crews are FISTA-trained. Review of sale contract confirmed that it requires use of Wisconsin BMPs and FISTA-training and that it specifies rutting criteria and utilization standards. Several different portions of the sale and adjacent resources were reviewed:
Also on Mecan River Fisheries Area	<p>Site 3A, Oak clearcut with retention</p> <p>Site 3B, Ice Age Trail</p> <p>Site 3C, Red Pine Second Thinning: The expect goal of gradual, long-term conversion towards mixture of oak, savanna, and white pine (some white pine seedlings were planted as part of original plantation) and interim pine production are reasons for the thinning. Discussed ecology of the native, but somewhat overly-dense (mono-layer in places) Pennsylvania Sedge.</p> <p>Site 3D, Scrub Oak, untreated areas</p> <p>Site 3E, Jack Pine patch clearcut and regenerated to other species, based on multi-disciplinary agreement.</p> <p>Site 3F, Red Pine Third Thinning: Similar to Site 3C except that this part of the stand was previously thinned twice and the trees are larger. All pine thinning areas received stump treatment to prevent Annosum.</p> <p>Site 4, Prairie and Open Field Management Discussed various management challenges associated with trying to maintain non-forested cover in the face of continual encroachment</p>

	by Aspen, pine, and other species. Pre-settlement fire patterns kept the lands open, but absent frequent fire the diversity of native species is reduced. One area of spotted knapweed likely will be sharecropped for several years, so that the farmer will remove the weeds, pay a rent, and then help set the site up for planting and long-term management with more appropriate cover.
Chaffee Creek Fishery Area	
Sale 7020-94 Cougar Sale	The overall sale is much larger than the portions viewed during the site visit. They include aspen, oak, & white pine regeneration harvests and pine thinnings. No harvesting has occurred as yet. Reviewed the 7-acre proposed aspen stand conversion to wet mesic prairie will be quite challenging, requiring expensive follow-up treatments.
Upper Fox Headwaters SNA	An extensive discussion of the restoration challenges associated with restoration and management of open types. This site is close to a four-lane highway, has many invasive plants, worsened by the Ice Age Trail, and is subject to rules regarding endangered species and potential “incidental take” associated with any management effort.
Ice Age Trail	Several connector sections were walked, and management challenges discussed. Forester has added contract provisions designed to further protect the trail during harvesting, based on experience with previous sales.
Lawrence Creek Fish and Wildlife Area	
Lawrence Creek Timber Sale	Planning and the sale were completed prior to current direction requiring interim management plans. The harvest was completed in the summer of 2011. This portion of the harvest included black locust treatment via the saw head of the processor, but the locust has sprouted from cut stems and from roots and now presents a major challenge. The site also has invasives, including Japanese Hedge Parsley.
Auditor Norman Boatwright	
Pike Lake Unit, Kettle Moraine State Forest	
Pike Lake Office	Overview of park operations and cooperation with local recreation businesses to promote park usage.
Ice Age Trail	DNR had acquired a buffer strip for the Trail and planted it in oaks, maple and hickory. This was the 2 nd planting attempt which appeared to be successful.
Sale No. 6701-1	White and spruce pine 1 st thin with ash removal. Good residual stocking with minimal damage to residuals
Lowes Lake Unit, Kettle Moraine State Forest	
Sale No. 5463-3	58 acre sale with the northern section consisting of a northern hardwood stand dominated by sugar maple with ash and northern red oak. The sale has been sold but not cut. The sale is a selection/timber stand improvement cut favoring retention of maple

	and oak.
Kettle Moraine State Forest, Northern Unit	
Sale No. 2-11	Initial entry to promote oak health and vigor and maintain cover type. Accomplished by an intermediate thinning with a residual BA of 75-85. Sale has been bid 3 times with no winners. Likely due to the large amount of pulpwood marked.
Youth Camp Road Planting	Former sharecrop field converted to forest. Planted 4 years ago in oak, cherry and conifers. Good survival and stocking. Reviewed regeneration survey.
Mauthe Lake Wetland Restoration	Plugged ditch to create a nice pond. Also restored prairie area with planted big blue stem that was burned last year. EAB was discovered in a trap nearby and the ash was marked for removal.
Jersey Flats	Farm land converted to prairie.
Headquarters, Northern Unit	Diesel and gas tanks double line with leak detection system and containment structures. Large, locked and vented herbicide storage area.
Parnell Area, Conifer Timber Sale	Buckthorn removal test. Red pine cut back to 20 BA, Buckthorn mowed, sprouts sprayed with garlon and the area planted in oaks, cherry and white pine. Buckthorn was not eliminated. Reviewed regeneration survey.
Central Hardwood Timber Sale	Stand dominated with oak, cherry and hickory. Timber stand improvement cut removing undesirable species. Excellent natural regeneration observed.
Shamrock Road	Brushing and haying using haying agreement in prairie plantings.
Parnell Area Timber Sales	Aspen regeneration, invasive plant BMPs, red shouldered hawk nest success monitoring in sales, tree planting with donor funding, brush-land restoration.
Date: August 23, 2013	
FMU / Location / sites visited	Activities / notes
State Natural Resources Building, Madison	8:00-11:30: Miscellaneous interviews; auditors consult about findings. 11:30-12:30: Closing meeting.

3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	5
B. Number of auditors participating in on-site evaluation:	4
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	4
D. Total number of person days used in evaluation:	24

3.1.3 Evaluation Team

Auditor Name:	David Capen	Auditor role:	Lead Auditor, FSC
Qualifications:	Dr. David E. Capen is a Professor Emeritus in the Rubenstein School of Environment		

	<p>and Natural Resources at the University of Vermont. He has a B.S.F. degree in Forestry from the University of Tennessee, an M.S. degree in Wildlife Management from the University of Maine, and a Ph.D. in Wildlife Science from Utah State University. He was an active member of the faculty at the University of Vermont from 1976 to 2010, maintaining a part-time research appointment since retiring from teaching in 2002. His research expertise includes studies of forest management and habitat for birds; GIS applications for landscape-level habitat analysis; conservation design to protect biodiversity. David is a Certified Wildlife Biologist and was a Certified Forester from 2002-2008. He has been a member of The Wildlife Society for more than 40 years; the Society of American Foresters for more than 20 years; a charter member of Society for Conservation Biology; and a member of several professional ornithological organizations. He has conducted numerous FSC audits in Massachusetts, Maine, Michigan, Minnesota, Pennsylvania, New York, Wisconsin, and Indiana.</p>		
Auditor Name:	Brendan Grady	Auditor role:	Team Auditor, FSC
Qualifications:	<p>Mr. Grady is the Director, Forest Management Certification for SCS. In that role, he provides daily management and quality control for the program. He participated as a team member and lead auditor in forest certification audits throughout the United States, Europe, and South East Asia. Brendan has a B.S. in Forestry from the University of California, Berkeley, and a Juris Doctorate from the University of Washington School of Law. Brendan is a member of the State Bar of California, and was an attorney in private practice focusing on environmental law before taking his current role at SCS.</p>		
Auditor Name:	Mike Ferrucci	Auditor role:	Team Auditor, FSC; Lead Auditor SFI
Qualifications:	<p>Mike Ferrucci is the SFI Program Manager for NSF – International Strategic Registrations and is responsible for all aspects of the firm’s SFI Certification programs. He is qualified as a RAB-QSA Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor for Forest Management, Procurement, and Chain of Custody, as an FSC Lead Auditor Forest Management and Chain of Custody, as a Tree Farm Group Certification Lead Auditor, and as a GHG Lead Auditor. Mike has led Sustainable Forest Initiative (SFI) certification and precertification reviews throughout the United States. He has also led or participated in joint SFI and Forest Stewardship Council (FSC) certification projects in nearly one dozen states and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He also co-led the pioneering pilot dual evaluation of the Lakeview Stewardship Unit on the Fremont-Winema National Forest.</p> <p>Mike Ferrucci has 33 years of forest management experience. His expertise is in sustainable forest management planning; in certification of forests as sustainably managed; in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis on regeneration and management of native hardwood species. Mike has conducted or participated in assessments of forest management operations throughout the United States, with field</p>		

	<p>experience in 4 countries and 33 states. Mike has been a member of the Society of American Foresters for over thirty-five years. He is Past Chair of the SFI Auditor’s Forum. Mike is also a Lecturer at the Yale School of Forestry and Environmental Studies, where he has taught graduate courses and workshops in forest management, harvesting operations, professional forest ethics, private forestry, and financial analysis.</p>		
Auditor Name:	Norman Boatwright	Auditor role:	Team Auditor, FSC; Team Auditor, SFI
Qualifications:	<p>Norman Boatwright is the president of Boatwright Consulting Services, LLC located in Florence, South Carolina. BCS handles typical forestry consulting, SFI, ATF and FSC Audits, Phase I Environmental Site Assessments, Forest Soil Mapping, Wetland Delineation, and other Biological Services. Norman has over twenty-nine years’ experience in intensive forest management, eighteen years’ experience in environmental services and ten years’ experience in forest certification auditing. He has conducted Phase I Assessments on over three hundred and fifty projects covering 3,000,000 acres, Endangered Species Assessments on timberland across the South, and managed soil mapping projects on over 1.3 million acres. From 1985-1991, he was Division Manager at Canal Forest Resources, Inc. and was responsible for all forest management activities on about 90,000 acres of timberland in eastern South Carolina. Duties included budgeting and implementing land and timber sales, site preparation, planting, best management practices, road construction, etc. From 1991-1999, he was manager of Canal Environmental Services which offered the following services: Phase I Environmental Site Assessments, Wetland Delineation and Permitting and Endangered Species Surveys. From 1999-2012 he was the Environmental Services Manager, Milliken Forestry Company. Norman has extensive experience auditing SFI, procurement and land management organizations and American Tree Farm Group Certification Programs. He is also a Lead Auditor for Chain of Custody Audits under SFI, PEFC, and FSC</p>		

3.2 Evaluation of Management System

3.2.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME’s conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and

expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3.2.2 Pre-evaluation

A pre-evaluation of the FME *was not* required by FSC norms.

A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

3.3 Stakeholder Consultation Process

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Principal stakeholder groups are identified based upon results from the pre-evaluation (if one was conducted), lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders in this evaluation:

3.3.1 Stakeholder Groups Consulted During Evaluation for Certification

FME Management and staff	Pertinent Tribal members and/or representatives
Consulting foresters	Members of the FSC National Initiative
Contractors	Members of the regional FSC working group
Lease holders	FSC International
Adjacent property owners	Local and regionally-based environmental organizations and conservationists
Local and regionally-based social interest and civic organizations	Forest industry groups and organizations
Purchasers of logs harvested on FME forestlands	Local, state, and federal regulatory agency personnel
Recreational user groups	Other relevant groups

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

3.3.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

Stakeholder Comments	SCS Response
Economic Concerns	
I think that it was helpful when the DNR had a liaison between the department and the business community to help promote the forest products industry in WI.	DNR staff showed in depth knowledge and interaction with forest products industry during the audit. While relationships could always be improved, no non-conformance to the standard is warranted.
DNR procures goods and services locally	Evidence of conformance, no response needed.
DNR forestry operations are providing clear economic benefits to local communities	Evidence of conformance, no response needed.
Social Concerns	
Non-motorized recreational opportunities are insufficient	Review of recreational opportunities during the audit showed a mix of motorized and non-motorized activities. While certain of the more high profile and heavily trafficked parks allow for motorized recreation, non-motorized activities are also readily available and well utilized. See Statewide Comprehensive Outdoor Recreation Plan (SCORP) for more details. No non-conformance is warranted.
WDNR is effectively engaging with Native Americans.	Evidence of conformance, no response needed.
There are readily available opportunities for input into management planning.	Evidence of conformance, no response needed.
WDNR maintains positive relationships with neighbors	Evidence of conformance, no response needed.
Environmental Concerns	
Forest management in Wisconsin is a model for the nation.	Evidence of conformance, no response needed.
The State is doing a good job regarding forest management on State lands.	Evidence of conformance, no response needed.
DNR is taking appropriate action in protecting rare and endangered species.	Evidence of conformance, no response needed.

4. Results of The Evaluation

Table 4.1 below, contains the evaluation team’s findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C.

Principle / Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard
P1: FSC Commitment and Legal Compliance	WDNR is in compliance with all applicable laws and requirements. Commitment to FSC is conveyed at all levels of the management planning and operations.	
P2: Tenure & Use Rights & Responsibilities	The DNR real estate department ensures rights and easements are properly maintained. Tenure and use rights are demonstrated through required deeds and easements and are available.	
P3: Indigenous Peoples’ Rights	Significant sites are protected and kept confidential when necessary.	
P4: Community Relations & Workers’ Rights	WDNR takes affirmative steps to understand the social impacts of their management and there are numerous avenues for interested parties to comment on management planning and harvests.	
P5: Benefits from the Forest	WisFIRS ensures compliance with harvest level requirements.	
P6: Environmental Impact		OBS 2013.1 Minor CAR 2013.2 Minor CAR 2013.3
P7: Management Plan	Wisconsin Administrative code, NR 44, outlines in detail the requirements for master planning for department properties and ensures that all management planning requirements are amply met, both at the state level and for individual properties.	
P8: Monitoring & Assessment		Minor CAR 2013.4
P9: High Conservation Value Forests	Because of the significant overlap of State Natural Area and HCVF designation, WDNR is in full	

	compliance with the requirements relating to HCVFs. With the nation’s largest and oldest natural areas protection program, DNR has undergone extensive review and assessment of HCVF within the SNA program, which has furthered compliance with this principle.	
Chain of custody		See CAR 2013.4 Minor CAR 2013.5

4.2 Process of Determining Conformance

4.2.1 Structure of Standard and Degrees of Nonconformance

FSC-accredited forest stewardship standards consist of a three-level hierarchy: principle, the criteria that correspond to that principle, and the performance indicators that elaborate each criterion. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each nonconformance must be evaluated to determine whether it constitutes a major or minor nonconformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in nonconformance. The team therefore must use their collective judgment to assess each criterion and determine if the FME is in conformance. If the FME is determined to be in nonconformance at the criterion level, then at least one of the applicable indicators must be in major nonconformance.

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

4.2.1 Interpretations of Major CARs, Minor CARs and Observations

Major CARs: Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME’s response to the CAR within the stipulated time frame.

Minor CARs: These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

Observations: These are subject areas where the audit team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

4.2.2 Major Nonconformances

<input checked="" type="checkbox"/>	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.

4.2.3 Existing Corrective Action Requests and Observations

Finding Number: 2012.1	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator(s):	FSC US 1.1.b
Non-Conformity (or Background/ Justification in the case of Observations): DNR has not compiled a listing of the applicable federal, state, county, municipal, and tribal laws to facilitate determination of conformance with FSC US 1.1.a and to ensure that employees and contractors are duly informed about applicable laws and regulations.	
Corrective Action Request (or Observation): DNR must ensure that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	
FME response (including any evidence submitted)	Upon reviewing draft CARs and OBS, the Certification Coordinator submitted a response to SCS, "...the audit team missed Appendix D of our recently revised and published Forest Management Guidelines. The Forest Management Guidelines is a publication that we use with contractors, landowners, foresters, etc."
SCS review	Appendix D of the Forest Management Guidelines is the appropriate reference for laws and authorities that address this indicator. Although such evidence was requested before and during the audit, it is appropriate to close this CAR before the draft audit report is delivered.

Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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Finding Number: 2012.2	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify):
FSC Indicator(s):	FSC US 4.2.b
Non-Conformity (or Background/ Justification in the case of Observations): Although contracts with logging contractors contain language requiring contractors to abide by OSHA regulations concerning job-site safety, DNR foresters responded to questions from auditors by indicating that they do not enforce compliance with these regulations upon observing unsafe practices, e.g., working without personal protective equipment. There were limited opportunities to observe contractors at work on this audit, and no instances of unsafe behavior, but there appears to be double standard—DNR employees do comply with requirements to wear protective gear, but they look the other way when contractors do not.	
Corrective Action Request (or Observation): DNR, their employees, and contractors should address their policies and procedures for demonstrating a safe work environment.	
FME response (including any evidence submitted)	<p>The Wisconsin DNR has a strong track record of supporting contractor training and professionalism, including the requirement for logging contractors to maintain FISTA SFI-trained certification and support of the Wisconsin Master Logger (WML) program. FISTA and WML both incorporate elements of work site safety into their programs.</p> <p>It is in the DNR’s interest to have the OSHA standards enforced to promote safety within our industry; however, it is OSHA’s role to enforce OSHA standards. Additionally, the contract is signed with the contractor and it is the contract holder who is the employer and thus responsible for his/her employees conformance with OSHA requirements. It is not reasonable for DNR to interfere with the employer/employee relationship to the end of suggesting to on-site worker’s the need to take appropriate safety precautions. Additionally, state staffs are not trained on all of the requirements of the OSHA standard.</p> <p>The administering forester, as the contract seller, typically covers any sale specific safety concerns (e.g. power lines) during a pre-sale meeting and may also cover the general safety provisions of the contract. The administering forester may also make the contract purchaser aware of any obvious violations of safe working practices of the purchaser’s employees or sub-contractors that were noted during a routine timber sale inspection.</p>

SCS review	Wisconsin DNR's approach is adequate to address the issues within the constraints of a contractor relationship.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2012.3	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator(s):	FSC US 6.1.B
Non-Conformity (or Background/ Justification in the case of Observations): For lands not covered by either a NR44-compliant master plan or a landscape-focused plan, site disturbing activities are being carried out without completing an Interim Forest Management Plan. A Minor CAR was issued in 2011 (CAR 2011.3) for the same non-conformity, thus the CAR is elevated to a Major.	
Corrective Action Request (or Observation): DNR must identify cases of non-conformance with FSC 6.1.b, since CAR 2011.3 was issued, and report these to Scientific Certification Systems. DNR must then ensure that managers assess and document impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a prior to undertaking additional site disturbing activities (except where contracts for such activities have already been signed).	
FME response (including any evidence submitted)	<ol style="list-style-type: none"> WI DNR has analysed it's timber sale records and determined that there are 47 instances where timber sales were established on properties without Interim Forest Management Plans (IFMPs) on or after March 16, 2012 (the date of issuance of a the Minor CAR). Properties and their associated timber sales were deleted from the master list because in one case a property Master Plan was complete and waiting NRB approval; and in 23 cases timber sales were already sold, under contract and in many cases were complete. This leaves 25 properties requiring IFMPs for work already established. Two properties were added for tracking because local managers wanted to group other properties for IFMP development purposes. WI DNR also understands and has directed staff that an IFMP or a NR44 compliant master plan must be in place prior to selling any future timber sale. The only rare exception will be consideration for situations where life or property is threatened, e.g. storm damage in a high fire danger landscape. The attached Excel files detail the properties and sales involved. Cause analysis: The response to the 2011 minor CAR for the same noncompliance involved an IFMP development directive to staff from the Lands Division Administrator in May 2012. Although the directive was comprehensive and complete, it was apparent that it did not clearly identify who was receiving the assignment to complete IFMPs or in what

	<p>situations IFMPs were required. The IFMP development guidance was packed into a very large email that contributed to staff having a difficult time accessing the needed information. In some cases the directive was received by staffs that were entering a busy summer field season and the urgency for immediate action by Lands Division staff was not communicated. Forestry Division staff also play a key role in the development of IFMPs; the May guidance did not clearly identify the forester's role in IFMP development.</p> <p>3. Corrective Action Plan:</p> <p>A. The Department will follow through on the development of IFMPs that address the assessment of forest cover types, age or size classes, and habitats at relevant spatial scales including multidisciplinary planning and management planning, particularly for timber sales; SFI indicator 4.1.5.</p> <p>B. Identify properties and timber sales where immediate IFMP development must occur to proceed with established timber sales (see Major CAR IFMPs required spread sheet attached).</p> <p>C. Reissue guidance to Lands Division staff that clearly states the assignment to develop IFMP's by November 7, 2012 to enable a coordinated public outreach/comment period of two weeks, November 8 - November 21.</p> <p>D. Issue clear guidance to foresters that clarify the foresters' role in the IFMP development process.</p> <p>E. Develop an IFMP web page to house information and data links for IFMP development; note: developed prior to reissued guidance memo.</p> <p>F. Completed IFMPs will be available for review by the CB by December 10, 2012; see http://dnr.wi.gov/topic/lands/IFMP.html for completed IFMP's. <i>Note: 26 IFMP's were completed for 36 properties.</i></p> <p>4. Both the IFMP directive issued by Kurt Thiede, Lands Division administrator and a clarification of the forester's role issued by Darrell Zastrow, Deputy Forestry Division Administrator clearly state that all future timber sales will need either a completed IFMP or a NR44 compliant master plan prior to a sale being sold. Ideally as we catch up with a backlog of this planning workload, IFMPs or Master Plans will be in place prior to sale establishment. Annual integrated property meetings will continue to be required by March 1 of each calendar year; managers will look for the opportunity to coordinate new IFMP development to support the work plans identified during the integrated property meeting process.</p> <p>Referenced documents are included in the transmittal email.</p>
<p>SCS review</p>	<p>SCS verified that the IFMPs identified to be created immediately were available on the WDNR webpage. The IFMPs include an assessment of impacts of planned management activities on elements 1-5 listed in Indicator 6.1.a. Site-level plans and SOPs may address certain elements in more detail. For example, while soil resources are described in IFMPs consistent with 6.1.a, in some IFMPs impacts to soils are only mentioned where sensitive hydrological features are known to exist at the unit level. In these cases, the assessment of any impacts to soils may be addressed in site-level plans.</p>

Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
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Finding Number: 2012.4	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator(s):	FSC US 8.3.a
Non-Conformity (or Background/ Justification in the case of Observations): In one instance, DNR foresters were not aware of the proper protocols for tracking FSC-certified products from the stump to mill. Normally, trip tickets are used for such tracking because DNR usually sells wood on a weight or volume basis, determined at the mill. But, in the instance of a lump-sum sale without trip tickets (as planned), there would be no safeguard to prevent mixing of certified products from DNR lands with uncertified products from elsewhere.	
Corrective Action Request (or Observation): DNR must ensure that foresters understand the process of maintaining chain of custody of certified products.	
FME response (including any evidence submitted)	<p>The Department’s Timber Sale Handbook has been modified to clarify the use of the “ticket system” for lump-sum or scaled sales. The language states: <u>“MILL SCALE TICKET SYSTEM – SCALING or CERTIFICATION CHAIN OF CUSTODY DOCUMENTATION</u></p> <p>The following are guidelines for use of a mill scale ticket system for administering a timber sale to determine harvested volumes. This system may also be used on field scaled or lump-sum sales to provide Forest Certification Chain of Custody (COC) documentation if a purchaser requests such documentation. Haul tickets may be issued as shipping documentation to help a contractor maintain the COC. Tickets should be treated similarly for COC documentation as they would be used for receiving mill scaled volumes. More information on certification COC can be found in the Public Forest Lands Handbook 2460.5.”</p> <p>New language was added regarding certification Chain of Custody in the Public Forest Lands Handbook: <u>“FOREST CERTIFICATION Chain of Custody</u></p> <p>FSC and SFI certification provide an opportunity to differentiate responsibly harvested wood in the marketplace. Ultimately, when finished goods are produced from raw materials that originate from certified lands, these certification systems allow the use of on-product logos. FSC and SFI have specific on-product logos that can be used to identify</p>

	<p>wood sourced from certified lands.</p> <p>Chain-of-Custody (COC) documentation allows for the tracking of a product through every step from the forest to finished goods. The FSC standard includes criteria 8.3, which states “Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the “chain of custody.” There are two indicators within this chain of custody criteria. Indicator 8.3.a states “When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale.” Indicator 8.3.b states “The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.” The SFI certification program also requires organizations that sell or transfer certified products to provide customers with documentation of the certified products which clearly accounts for their origin from certified lands.</p> <p>On state and county forest timber sales the certified chain of custody is maintained by the state or county up to the forest gate, the point at which the ownership of the forest product changes. The forest gate in most cases is the stump with the authorized harvest being the transfer of ownership. The purchaser is responsible for maintaining COC after leaving the sale area. This can be achieved by supplying suitable documentation to allow a contractor to maintain the COC until delivered at a certified mill. The contractor must also be COC certified or covered under a COC certificate from the destination mill. This documentation begins with timber sale contracts, which all contain the certification information required by the applicable certification standard.</p> <p>To satisfy chain of custody standards timber sale documents must contain a) name and contact details of the organization; b) name and address of the customer; c) date when the document was issued; d) description of the product; e) quantity of the products sold; f) the organization’s FSC and/or SFI Forest Management (FM/COC) code; and g) a clear indication of the product claim “FSC 100%” and/or “SFI-Certified”. If separate transport documents are issued (i.e. haul tickets for mill scale sales or for COC documentation), information sufficient to link the sales documents and related transport documentation to each other must be included, such as property name and sale number.</p> <p>In the case of mill scaled sales, the shipping documents (haul tickets) contain the required information to maintain chain of custody documentation to the receiving mill.</p> <p>In the case of field scaled sales or lump sum sales, where haul tickets are not issued to track timber volumes delivered to mills, haul tickets may be issued to provide COC documentation if a purchaser requests them. Haul tickets may be issued as shipping documentation to help a contractor maintain the COC. Tickets should be handled as they would for receiving mill scaled volumes as described under the Mill Scale Ticket System section of the Timber Sale Handbook. Contractors shall be responsible for the tickets they are issued with a record of ticket numbers issued being maintained and unused tickets returned at the close-out of a sale.</p> <p>Purchasers wishing to maintain COC documentation should deposit copies of tickets in a lock box before leaving the sale site only for any products which will be delivered as certified and require shipping documentation as requested by the purchaser. Subsequently, the receiving certified mill should send actual scaled volumes back to the timber sale administrator or manager to be reconciled with the tickets left in the drop box. This process is identical to the process for mill scaling products, and is required to account for the tickets</p>
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	<p>used and products claimed as certified products being hauled from a particular timber sale.</p> <p>In the case of harvesting any timber on lands that are not covered by forest certification, that is state or county lands that are not included within the scope of the certificates, forest products should be kept separate from any certified products and any timber sale and shipping documents should not include any certification code or product claim.</p> <p>These clarifications of policy were communicated to Division of Forestry staffs and supervisors and county forest administrators by Joe Schwantes, County Forests and Public Lands Specialist by email on July 31, 2013.</p>
SCS review	The additions to the public lands handbook sufficiently address the gap that was identified in WDNR's chain of custody system.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

4.2.4 New Corrective Action Requests and Observations

Finding Number: 2013.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 6.6.b
Background: Herbicides are used extensively by numerous DNR employees and contractors for a wide variety of applications, most often for control of invasive species. Interviews and review of documents showed that programs are in place to assure that laws and regulations are followed and that chemicals are applied safely. But, there is inconsistent evidence that the Department has made an effort to minimize the use of chemicals and to apply them at the least damaging formulation. Written strategies that justify the use of chemicals also are inconsistent across the Department.	
Observation: The Department of Natural Resources should take additional actions to assure that written strategies guide the minimal and consistent use of chemicals across the agency.	
FME response (including any evidence submitted)	
SCS review	

Status of OBS:	<input type="checkbox"/> Closed
	<input type="checkbox"/> Upgraded to Major
	<input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2013.2	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 6.6.d
Non-conformance: Written requests for use of chemicals are required, but the format of the request does not always address site-specific hazards, environmental risks, precautions to minimize risks, and maps of treatment areas.	
Corrective Action Request: The Department of Natural Resources must assure that written prescriptions for use of chemicals address the required elements of this indicator.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2013.3	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 6.7.a
Non-conformance: An auditor observed an on-going, minor leak of hydraulic fluid from a piece of harvesting equipment. There was no spill kit on site. Two mechanics arrived with a spill kit at least 40 minutes after the auditor arrived. Wisconsin BMP Manual clearly specifies that, for spills of fuels and lubricants used in forest operations, spill and containment kits will be on site	
Corrective Action Request: The Department of Natural Resources must take steps to assure that employees and contractors have the equipment necessary to respond to hazardous spills.	

FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2013.4	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 8.3.a
Non-conformance: A timber sale prospectus sheet from May 2013 demonstrated improper use of the FSC trademark requirements, in particular the out-of-date FSC claim language (FSC Pure rather than 100%). The language on the prospectus also misidentified the certified landbase as the "LWSR" rather than the Wisconsin DNR. The FSC logo was also used without required format.	
Corrective Action Request: The Department of Natural Resources must seek approval from SCS prior to logo and trademark use.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2013.5	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS FSC Chain of Custody Indicators for Forest Management Enterprises, Indicator 5.1

Non-conformance: Interviews with field staff showed inconsistent knowledge of the chain of custody requirements, answering that either claim could be used (100% or Pure).	
Corrective Action Request: All relevant FME staff and outsourcers shall be trained in the FME's COC control system and shall demonstrate competence in implementing the FME's COC control system.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

5. Certification Decision

Certification Recommendation	
FME be awarded FSC certification as a "Well-Managed Forest" subject to the minor corrective action requests stated in Section 4.2.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols. If certification is recommended, the FME has satisfactorily demonstrated the following without exception:	
FME has addressed any Major CAR(s) assigned during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
FME has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this report) are met over the forest area covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: No Major CARs were assigned.	

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – Current and Projected Annual Harvest for Main Commercial Species

Acres (area control, rpt. 201)

4,891	ASPEN
1,486	BOTTOMLAND HARDWOODS
255	WHITE BIRCH
163	WHITE CEDAR
611	CENTRAL HARDWOODS
111	BALSAM FIR
182	FIR SPRUCE-*OLD CODE, RECODE
220	HEMLOCK
46	MISCELLANEOUS CONIFEROUS
33	MISCELLANEOUS DECIDUOUS
479	RED MAPLE
3,375	NORTHERN HARDWOODS
4,796	OAK
702	SCRUB OAK
665	JACK PINE
2,758	RED PINE
1,693	WHITE PINE
265	BLACK SPRUCE
91	SWAMP CONIFER-*OLD CODE, RECODE
710	SWAMP HARDWOODS
111	WHITE SPRUCE
233	TAMARACK

Appendix 2 – List of FMUs Selected for Evaluation

FME consists of a single FMU

FME consists of multiple FMUs or is a Group

SCS staff establishes the design and level of sampling prior to each group or multiple FMU evaluation according to FSC-STD-20-007. A list of the FMUs sampled and the rationale behind their selection is listed below.

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other – please describe

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Appendix 3 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Mark Heyde	Forest Certification Coordinator	Division of Forestry	Interview
Craig Thompson	District Land Program Manager, West Central District	Division of Lands	Interview
Alan Crossley	Public Land Management Specialist	Bureau of Wildlife Management	Interview
Kristen Tomaszewski	Planner	Division of Forestry	Interview
Paul Cunningham	Staff Specialist	Bureau of Fisheries	Interview
Jeff Weatherly	Area Forestry Leader	Division of Forestry	Interview
Karl Martin	Chief, Wildlife and Forestry Research Section	Bureau of Science Services	Interview
Jeff Prey	Program and Policy Analyst	Recreation, Planning and Development Section, Bureau of Parks	Interview
Tom Boos	Plant Pest and Disease Specialist, Forest Health Team	Sciences Section, Bureau of Forest Management	Interview
Bernie Williams	Conservation Biologist, Forest Health Team	Sciences Section, Bureau of Forest Management	Interview
Andrea Diss-Torrance	Plant Pest and Disease Specialist, Forest Health Team	Sciences Section, Bureau of Forest Management	Interview
Carmen Hardin	Chief Sciences Section	Bureau of Forest Management	Interview
Joe Schwantes	County and Public Lands Specialist	Public and Private Forestry Section, Bureau of Forest Management	Interview
Teague Prichard	State Forest Specialist	Public and Private Forestry Section, Bureau of Forest Management	Interview
Brad Hutnik	Ecologist and Silviculturist	Forest Sciences Section, Bureau of Forest Management	Interview

Eric Grudzinski	Forestry Law Enforcement Specialist	Fire and Law Enforcement Section, Bureau of Forest Protection	Interview
Mark Dudzik	Archaeologist	Facilities Management Section, Bureau of Facilities and Lands	Interview
Steve Miller	Director	Bureau of Facilities and Lands	Interview
Rebecca Diebel	Chief, Staff and Partner Services Section	Bureau of Forestry Business Services	Interview
Kate Fitzgerald	Chief, Land Management Section	Bureau of Facilities and Lands	Interview
Quinn Williams	Attorney Supervisor	Bureau of Legal Services	Interview
Shelly Allness	Tribal Liaison	Division of Lands	Interview
Randy Hoffman	Conservation Biologist, Program Integration	Bureau of Natural Heritage Conservation	Interview
Drew Feldkirchner	Conservation Biologist, Public and Private Forestry Section	Bureau of Natural Heritage Conservation	Interview
Adrian Wydeven	Forest Wildlife Biologist, Ecology Section	Bureau of Wildlife Management	Interview
Scott Walter	Staff Specialist, Ecology Section	Bureau of Wildlife Management	Interview
Eric Lobner	District Wildlife Supervisor, Southern District	Bureau of Wildlife Management	Interview
Andy Stoltman	Forest Inventory Specialist	Staff and Partner Services Section, Bureau of Forestry Business Services	Interview
Matt Seguin	Property Manager	Lower Wisconsin State Riverway	Interview
Sharon Fandel	District Ecologist	Bureau of Natural Heritage Conservation	Interview
Kobby Antioi	Forester	Division of Forestry	Interview
Nick Morehouse	Forester	Lower Wisconsin State Riverway	Interview
Travis Anderson	Wildlife Biologist	Bureau of Wildlife Management	Interview
Mary Ann Buenzow	Forestry Team Leader	Southern District	Interview
Nate Fayram	Conservation Biologist	Bureau of Natural Heritage Conservation	Interview
Dean Edlin	Conservation Biologist	Bureau of Natural Heritage Conservation	Interview
Armund Bartz	District Ecologist	Bureau of Natural Heritage Conservation	Interview

Gary Harden	Forester	Division of Forestry	Interview
Bill Carlson	Forestry Team Leader	Division of Forestry	Interview
Joel Jepsen	Forester	Division of Forestry	Interview
Ron Lichtie	Wildlife Biologist	Bureau of Wildlife Management	Interview
Steve Courtney	District Forestry Leader	West Central District	Interview
Sue Crowley	Area Forestry Leader	Mississippi River Area, West Central District	Interview
Adam Zirbel	Forester	Division of Forestry	Interview
Jayne Collins	Ranger	Wildcat Mountain State Park	Interview
Jim Moorhead	Ranger	Wildcat Mountain State Park	Interview
Lenore Schroeder	Team Leader	Wildcat Mountain State Park	Interview
Jordan Weeks	Fisheries Biologist	Bureau of Fisheries	Interview
Tim Babros	Area Wildlife Supervisor	Bureau of Wildlife Management	Interview
Zach Neitzel	Forester/Ranger	Division of Forestry	Interview
Dan Goltz	Wildlife Biologist	Bureau of Wildlife Management	Interview
Aaron Young	Area Forestry Leader	Dodgeville Area, Southern District	Interview
Craig Kopacek	Wildlife Technician	Bureau of Wildlife Management	Interview
Bret Owsley	Area Wildlife Supervisor	Bureau of Wildlife Management	Interview
Randy Stampfl	Forester	Southern District	Interview
Mike Sieger	Forester	Southern District	Interview
Dan Schuller	Bureau Director	Bureau of Parks	Interview
Tim Lizotte	Area Wildlife Supervisor	Bureau of Wildlife	Interview
Paul Sandgren		Bureau of Parks	Interview
Jason Fritz	Southern District Supervisor	Bureau of Parks	Interview
Julie Peltier	Forester	Southern District	Interview
Rob Wessberg	Property Supervisor	Bureau of Parks	Interview
Dan Weidert	Wildlife Biologist	Bureau of Wildlife	Interview
Dale Katsma	Area Wildlife Supervisor	Bureau of Wildlife	Interview
Jason Quast		Bureau of Parks	Interview
Heather Wolf	Property Manager	Bureau of Parks	Interview
Kris Wimpe	Forester	Division of Forestry	Interview
Jon Robaidek	Wildlife Biologist	Bureau of Wildlife Management	Interview
Steve Schmelzer	Superintendent	Devil's Lake State Park	Interview
Paul Zajackowski	Supervisor, Southwest District	Bureau of Parks	Interview

John Nielsen	District Forester	Southern District, Division of Forestry	Interview
Jim Bennett	Forester	Southern District	Interview
Bruce Henderson	Forester/Ranger	Division of Forestry	Interview
R.J. Wickham	Forestry Team Leader	Division of Forestry	Interview
Nathan Nye	Fisheries Biologist	Bureau of Fisheries	Interview
Bob Nack	Area Wildlife Supervisor	Bureau of Wildlife Management	Interview
Jeff Nyquist	Forester	Division of Forestry	Interview
Sara Kehrli	Wildlife Biologist	Bureau of Wildlife Management	Interview
Joel Green	Forester	Division of Forestry	Interview
Al Ramminger	Wildlife Technician	Bureau of Wildlife Management	Interview
Jenifer Boice	Forester	Black River State Forest	Interview
Josh Waukau	Ranger	Black River State Forest	Interview
Larry Whaley	Area Forestry Leader	Division of Forestry	Interview
Mark Chryst	Forester	Division of Forestry	Interview
Steve Courtney	District Forester	West Central District, Division of Forestry	Interview
Jodi Stormoen	Team Leader	Division of Forestry	Interview
Wayne Hall	Wildlife Biologist	Bureau of Wildlife Management	Interview
Neal Paisley	Work Unit Supervisor	Bureau of Wildlife Management	Interview
Marc Sass	Ranger	Division of Forestry	Interview
Terri Wilson	Forester	Division of Forestry	Interview
Kris Johansen	Area Wildlife Supervisor	Bureau of Wildlife Management	Interview
Jim Holzwart	Wildlife Biologist	Bureau of Wildlife Management	Interview
Scott Sullivan	Forester	Division of Forestry	Interview
Matt Zine	SNA Management Specialist	Bureau of Natural Heritage Conservation	Interview
Ellen Barth	Area Wildlife Supervisor	Bureau of Wildlife Management	Interview
Jason Hennes	Forestry Technician	Division of Forestry	Interview
Jon Vote	Forestry Technician	Division of Forestry	Interview
Denise Krentz	Forestry Technician	Division of Forestry	Interview
Sarah Fischer	Forester	Division of Forestry	Interview
Jim Tomasko	Wildlife Technician	Facilities and Lands	Interview
Andrew Komassq	Forester	Weekly Timber and Pulp	Interview

Garrett Prusse	Forester	Weekly Timber and Pulp	Interview
Tom Hauge	Director	Bureau of Wildlife Management	Closing meeting
Kurt Thiede	Administrator	Division of Lands	Closing meeting
Paul DeLong	Administrator	Division of Forestry	Closing meeting
Darrell Zastrow	Deputy Administrator	Division of Forestry	Closing meeting
Frank Trcka	Deputy Director	Bureau of Wildlife Management	Closing meeting
Dan Schuler	Director	Bureau of Parks	Closing meeting
Peter Biermeier	Section Chief	Bureau of Parks	Closing meeting
Wendy McCown	Director, Bureau of Business Services	Division of Forestry	Closing meeting

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method
Matt Schultz	Pine Curve Consulting Forestry LLC		Survey response
Keb Guralski	WI Board of Commissioners of Public Lands		Survey response
Ray D. Perry	Perry Forestry Consulting, LLC		Survey response
Bethany Polchowski	Lambert Forest Products, LLC		Survey response
Aaron Burmeister	Burmeister Logging		Survey response
Joseph R. Kies	Domtar A.W. LLC		Survey response
Bob Paddock	Bob Paddock Forestry		Survey response
Dale Zaug	Zaug's Forest Enterprise		Survey response

Additional stakeholders provided comment but requested anonymity.

Appendix 4 – Additional Evaluation Techniques Employed

No additional evaluation techniques were employed during the audit.

Appendix 5 – Certification Standard Conformance Table

C= Conformance with Criterion or Indicator

C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances

NC= Nonconformance with Criterion or Indicator

NA= Not Applicable

REQUIREMENT	C/N	COMMENT/CAR
P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
C1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
1.1.a. <i>Forest</i> management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.	C	There is no evidence that DNR is not in compliance with any applicable federal, state, county, municipal, or tribal law. No outstanding violations were reported to the CB.
1.1.b. To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	C	Forest Management Guidelines include list of applicable laws as an appendix.
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	
1.2.a. The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.	C	State land is not subject to taxes, but the WDNR does make payments in lieu of taxes.
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.	C	International treaties in the U.S. are implemented through applicable federal and state laws. No evidence of non-conformance.
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	C	No conflicts between laws and certification criteria have arisen. WNDR is in close communication with their CB.
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the Forest Management Unit (FMU).	C	As a state agency WDNR has its own law enforcement staff, including forestry law enforcement specialists and game wardens. Most common forest related crimes involve timber theft and unauthorized fires. No trespass issues were observed during the audit (dumping, illegal harvest, squatting). Property managers have detailed, on-the-ground knowledge of land units. Personnel with Law Enforcement credentials are readily available for consultation and support.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	WDNR staff law enforcement work cooperatively with local law enforcement and county prosecutors when cases are brought to court.
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	C	
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and	C	The commitment to the P&C is communicated throughout the organizations via the WDNR – Public Lands Handbook pages 290-11 through 290-13. Wisconsin Forest Management Guidelines Appendix

has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.		C: Forest Certification describes the program
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	C	All DNR managed forest lands are included in the scope of the certificate. Certain agricultural and non-forest land owned by DNR is excluded.
1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	C	WDNR is in regular communication with SCS.
P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	C	
2.1.a. The forest owner or manager provides clear evidence of long-term rights to use and manage the FMU for the purposes described in the management plan.	C	DNR maintains a full time real estate department to cover land exchanges. Clear title to all property is maintained. Audit team reviewed deeds and other real estate transaction documents for recent land purchases to show process of land acquisition.
2.1.b. The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.	C	Deeds and other property records indicate presence of easements, use rights, and other third part rights.
2.1.c. Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.	C	Boundaries are always clearly identified prior to activities beginning. If borders are unclear or in dispute, land is surveyed and boundaries are re-established.
C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies. <i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i>	C	
2.2.a. The forest owner or manager allows the exercise of tenure and use rights allowable by law or regulation.	C	Type of use rights present vary by the parcel and management designation. Recreation use is common on park lands. No reported evidence that tenure or use rights were being restricted.
2.2.b. In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.	C	Consultation occurs regularly, chiefly through the management planning process when property master plans are created. Consultation over tribal use rights is done at a more senior level in a government to government relationship.
C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	C	
2.3.a. If disputes arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.	C	No significant disputes over tenure rights have occurred. Extensive stakeholder consultation in formal and informal (open door policy) is undertaken to diffuse any potential disputes.
2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.	C	There are no significant disputes over tenure and use rights. Should such disputes arise they are to be handled through the State Natural Resources Board.
P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		

C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	NA	
3.1.a. Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.		
3.1.b. The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.		
C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	C	
3.2.a. During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	Consultation is undertaken at several levels. The DNR has a new statewide tribal liaison (Shelly Allness) to interact with tribes at a government to government level. Other individual staff serve as liaison and contacts for individual tribes. Tribes are formally consulted during the master planning process to make sure that their resource rights are preserved.
3.2.b. Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	Known archeological and cultural sites are protected. DNR works cooperatively with tribes on managing tribal resources (jointly setting spearing limits, for example). Unit managers interviewed all demonstrated an understanding of the treaty rights of the Chippewa Tribes. Managers of land units within the treaty rights area indicated that they regularly work with tribal members to allow for gathering right, and many reach out to tribal leaders regularly to seek consultation.
C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.	C	See responses to 3.2. Master planning process goes through archeological review, etc. review
3.3.b. In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).	C	Through master planning process some special protection measures are identified. However, many special sites are kept confidential for their protection.
C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NA	
3.4.a. The forest owner or manager identifies whether <i>traditional knowledge</i> in forest management is being used.		
3.4.b. When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.		
3.4.c. The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.		
P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for	C	

employment, training, and other services.		
4.1.a. Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry.	C	Contractors interviewed indicated a high level of satisfaction with WDNR’s sales and land management policies. DNR staff indicated general satisfaction, although wages and benefits were stagnant in recent years coinciding with the downturn in the economy. DNR has begun hiring new staff across the agency to backfill open positions, indicating that funding for employment has opened up somewhat.
4.1.b. Forest work is offered in ways that create high quality job opportunities for employees.	C	DNR has a variety of positions within its large agency, allowing for a diverse array of natural resource related positions.
4.1.c. Forest workers are provided with fair wages.	C	Wages for independent logging contractors are set by market rates. DNR competes with private industrial forestland in the market for contractors.
4.1.d. Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.	C	Hiring and employment decisions are managed by a human resources department responsible in part for ensuring that discrimination laws are met.
4.1.e. The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.	C	Most logging contractors are local, and sales are advertised in different sizes to provide opportunities for both large and small businesses. DNR offices are located throughout the state, offering local employment for office staff, maintenance workers, and local vendors.
4.1.f. Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.	C	Wide variety of different opportunities to support public learning about forest management. DNR regularly publishes brochures, guides, and other printed materials intended to educate the general public about forestry and provide technical expertise to the profession. Examples include state BMP guidelines, guides for maintaining soil quality, forest pest management, etc. DNR also uses its forestland as a venue for outdoor learning, through interpretive trails, experimental forests, etc.
4.1.g. The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.	C	DNR offices are well distributed throughout the state where they are frequently a large presence in small rural communities. Individual staff reported on their civic engagement.
C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.		
4.2.a. The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	Staff has access to relevant laws, including state statutes and administrative codes using the internet. The Department maintains an intranet that houses manual codes and handbooks for all Department programs. A list of applicable laws and regulations was updated in 2011 and is maintained in the Division of Forestry’s Forest Management Guidelines publication, Appendix D.
4.2.b. The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	C	No active harvesting was reviewed during the audit, but safety discussions were held prior to field days. Contracts contain language requiring that contractors follow OSHA safety regulations.
4.2.c. The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	Loggers are required to undergo FISTA training.
C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).		
4.3.a. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.	C	There is a union for state employees covering DNR staff. The union has the ability to advocate for their members, although recent state legislation restricted some of their ability to collectively bargain.
4.3.b. The forest owner or manager has effective and culturally	C	Dispute resolution procedures continue to be available.

sensitive mechanisms to resolve disputes between workers and management.		
C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.		
<p>4.4.a. The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> • Archeological sites and sites of cultural, historical and community significance (on and off the FMU; • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p>	C	<p>WDNR takes affirmative steps to understand the social impacts of their management. A summary document was prepared in response to a previous CAR indicating where discussion of each impact could be identified.</p> <p>DNR has staff sociologists dedicated to understanding the social impact of forest management. The Wisconsin Environmental Policy act requires an evaluation of social impacts, including historic, cultural, scenic, and recreational resources. Archeological sites are mapped in state database and protections measures are put in place prior to activities beginning.</p> <p>Individual master plans include discussion of social impacts as part of a regional property analysis.</p>
4.4.b. The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.	C	Input from the public is required as part of management planning.
4.4.c. People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.	C	Local neighbors are contacted by individual property managers when activities begin. At a larger level, there is a government email distribution list that allows for interested parties to opt into notifications on certain topics and properties.
<p>4.4.d. For public forests, consultation shall include the following components:</p> <ol style="list-style-type: none"> 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>	C	<p>Government email distribution list that allows for interested parties to opt into notifications on certain topics (e.g. wolf management) and properties (e.g. X state forest).</p> <p>At an individual harvest level, managers communicate with neighboring owners when they are harvesting on a boundary. WEPA process provides opportunity for public input. Issues on a site level basis happen more informally. Harvest planning done on annual basis, with an opportunity for comment as part of that. All planning activities are presented on the DNR website for comment.</p> <p>Parties can avail themselves of administrative hearing process. Any decision by the department can be appealed (a decision being defined as any plan or permit). The aggrieved party has the opportunity to have appeal heard in front of hearing examiner.</p>
C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.		
4.5.a. The forest owner or manager does not engage in negligent activities that cause damage to other people.	C	No evidence of negligence during the audit.
4.5.b. The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances	C	DNR first tries to resolve disputes through informal means. The administrative hearing process is in place for aggrieved parties if

<p>and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>		<p>required. Finally there is the backup of the court system.</p>
<p>4.5.c. Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.</p>	<p>C</p>	<p>Compensation would be provided in cases where DNR was found liable for some damage.</p>
<p>P5 Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p>		
<p>C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</p>	<p>C</p>	
<p>5.1.a. The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.</p>	<p>C</p>	<p>DNR State Lands expenses are paid from revenues put into the Conservation Fund. This fund is a segregated (SEG) trust fund used to finance many of the state's resource management programs administered by the Department of Natural Resources (DNR). DNR programs supported by conservation fund revenues include wildlife and fish management, forestry, the state parks system, the endangered resources program, and several recreational vehicle programs. The conservation fund also supports programs and operations in other agencies. Revenues are generated by charging fees for hunting and fishing stamps and licenses, property millage tax, Forest Tax Law program, campsite and motor vehicle admission fees, boat, snowmobile and ATV registration fees and state and federal grants (refer to the Conservation Fund Informational Paper 62). The Bureau of Natural Heritage Conservation is funded mostly by grants.</p> <p>A review of the Conservation Fund Condition Statement 2011-2013 Biennium indicates 2011-2012 actual revenues were \$242,214,900 and expenses were \$234,005,300.</p>
<p>5.1.b. Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.</p>	<p>C</p>	<p>Interviews with DNR personnel indicate there has been a substantial decrease in funding during the recent economic downturn. DNR responded to this by prioritizing activities within each department and ensuring that the high priority items were done. A substantial number of senior employees opted to retire in the last several years, but many of those vacancies are now being filled.</p>
<p>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</p>	<p>C</p>	
<p>5.2.a. Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.</p>	<p>C</p>	<p>All sales on state lands are approved by the Timber Sales Manager and Forest Supervisor. Timber sale notices are placed in a newspaper that has general circulation in the county where the sale is located. DNR also maintains a list of interested buyers and send sales prospectus to them. Auditors visited more than 20 sites where contract work was in progress or had been completed in recently years, and observed that most contractors were local.</p>
<p>5.2.b. The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.</p>	<p>C</p>	<p>This activity is accomplished by the Forest Product Services Group. This group develops minimum harvest specifications that are placed in the harvest contract. These specifications are tailored to local markets. The group also works to develop markets for under-utilized forest products.</p>
<p>5.2.c. On public lands where forest products are harvested and</p>		<p>Most timber sales are relatively small and potentially suitable for</p>

<p>sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.</p>	<p>C</p>	<p>purchase by most small businesses. The DNR also offers a deferred payment option for most pay-as-cut sales. In addition, DNR allows buyers of lump sum timber sales to break them up into smaller cutting units and pay for them individually.</p>
<p>C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>	<p>C</p>	
<p>5.3.a. Management practices are employed to minimize the loss and/or waste of harvested forest products.</p>	<p>C</p>	<p>Harvesting contracts inspected during the audit stress the careful utilization of forest products, and inspections of recent harvests confirm conformance by contractors. In anticipation of a growing market for biomass, DNR has drafted a Biomass Harvesting handbook. The Department has a utilization and marketing specialist based in working with primary manufacturers. Regional forest products specialists are to be hired.</p> <p>Timber sale contracts include utilization clauses (for example: 4-inch tip for cordwood, 8-inch for softwood sawtimber and 10-inches for hardwood timber). When foresters inspect harvests they consider utilization issues; some of the harvest notes included utilization comments.</p> <p>Utilization in sites the team visited was observed to be good, with foresters checking and enforcing utilization standards. Markets exist for nearly all species and grades of wood grown on county forests. Exceptions are generally limited to less common, and less-commonly harvest species (for example white cedar).</p>
<p>5.3.b. Harvest practices are managed to protect residual trees and other forest resources, including:</p> <ul style="list-style-type: none"> • soil compaction, rutting and erosion are minimized; • residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; • damage to NTFPs is minimized during management activities; and • techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible. 	<p>C</p>	<p>Soil maps are included in the assessment of each site before harvest, as are water and other sensitive resources. Almost all harvesting on state lands is done with processors and forwarders. Field inspections confirmed an exceptionally low incidence of damage to residual trees, soils, and regeneration. Led by a department hydrologist, DNR is developing a regional reputation for its careful protection of soil and water resources during harvesting.</p>
<p>C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	<p>C</p>	
<p>5.4.a. The forest owner or manager demonstrates knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.</p>	<p>C</p>	<p>DNR makes every effort to respond to markets for both timber and non-timber products from their lands. Recreational opportunities, in particular, are abundant and well managed. Numerous examples of working with local clubs (snowmobiles, ATV, silent sports, etc.) were observed during the audit. DNR has a Forest Products lab where economists track forest trends in markets for forest products.</p>
<p>5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.</p>	<p>C</p>	<p>The Forest Product Services Group works with businesses to expand markets, including exports. It also assists businesses in obtaining federal grants to improve sawmilling techniques and develop new forest products. As a public agency, DNR manages for much more than economic uses, but still responds to legislative mandates for pursuing allowable harvest.</p>
<p>C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	<p>C</p>	
<p>5.5.a. In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.</p>	<p>C</p>	<p>Probably no better example of DNR’s conformance with this indicator could be found than management of state lands in the Driftless Area of SW Wisconsin. This region is known for its unique complex of rivers and streams, many of which are fed by underground springs and serve as productive habitat for trout and other fish species. Two auditors spent three days in the region. As a prelude to master planning in the</p>

		region, the Bureau of Fisheries has led an effort to produce a Landscape Assessment for Rivers and Streams of the Driftless Area. Unlike other regions of Wisconsin, land management in the Driftless Area is focused on services and resources other than wood products.
5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.	C	Inspection of sites during the field audit in the Driftless region confirmed that land managers (fisheries and wildlife biologists, ecologists, foresters, and recreation specialists) were working together to address public values, such as recreation and watershed protection. Wildcat Mountain State Park was one such example.
C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	C	
5.6.a. In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan. The sustained yield harvest level calculation for each planning unit is based on: <ul style="list-style-type: none"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.	C	The sustained yield harvest in an output of the Wisconsin Forest Inventory and Reporting System (WisFIRS), and is routinely projected for 15 years. At present, growth rates are not used in projections, although a CFI system is being implemented that will allow calculation of growth. Instead, forest stands are visited on a 10-year cycle for reconnaissance, which includes measurements of volume. Recon data are considered in the annual update of 15-year harvest projections.
5.6.b. Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	C	In 2013, timber sales were scheduled or completed for 21,057 acres. The 15-year projected AAH is 24,610, which includes the smoothed backlog of harvesting due, in part, to the addition of "other" state lands into the universe of managed lands. This is consistent with the pattern from 2009 through 2012: actually scheduled harvest somewhat below projected AAH.
5.6.c. Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	C	Master plans clearly set desired conditions for different forest types and age classes on each property. Management codes for each stand are established to move the land unit toward these conditions. Several site visits during the audit were to stands that were being restored to historical conditions.
5.6.d. For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	C	NTFPs include firewood, berries, bark, and boughs. Permits are issued for firewood cutting, in small quantities; berry picking occurs in several locations, but there is no indication that any of it is commercial. Tribes track the harvest of their members and report to DNR annually.
P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and		

landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.		
C6.1. Assessments of environmental impacts shall be completed - appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	C	
<p>6.1.a. Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:</p> <ol style="list-style-type: none"> 1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>; 2) <i>Rare, Threatened and Endangered (RTE) species</i> and <i>rare ecological communities</i> (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) <i>Soil resources</i>; and 6) <i>Historic conditions</i> on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions. 	C	The master planning process for state lands is authorized by Administrative Directive NR 44. Master plans present detailed analyses of historic conditions and natural disturbance patterns. More specifically, the Timber Sale Handbook lists specific topics that must be addressed on Form 2460 prior to management actions. Form 2460 might be regarded as a mini-environmental assessment. Soil types, water resources, habitat types, rare species or communities, and cultural sites would be described on this form.
<p>6.1.b. Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the <i>best available information</i>, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	C	Form 2460 is required to be completed before a timber sale is carried out. Other site-disturbing activities require different plans. Chapter 32 of the Timber Sale Handbook lists specific topics that must be included in the assessment recorded on Form 2460, and appropriate codes for some of these items. These site-specific plans complement broad goals of master plans for long-term landscape composition.
<p>6.1.c. Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>	C	The narrative portion of the assessment for numerous pre-sale plans inspected during the audit were consistent with the expectations of this indicator. Form 2460s present methods to avoid negative environment impacts and to enhance the long-term viability of the forest. Where master plans have not been prepared or are out of date, a number of guidance handbooks (e.g., silviculture handbook, old-growth handbook) and other documents assure conformance when used as guides for field prescriptions.
<p>6.1.d. On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	C	The process for developing property-specific master plans and interim plans does include steps for involving the public in developing draft and final plans. Final assessments are available to the public on departmental web sites or by request in DNR offices. In addition, Annual Integrated Property Meetings are held for each property or group of properties and offer opportunities for public comments on proposed or ongoing projects.
C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest	C	

<p>management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>		
<p>6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	C	<p>DNR has a thorough process for addressing the management of RTE species. Prior to master planning, Rapid Ecological Assessments are conducted by ecologists from the Bureau of Natural Heritage Conservation. Thus, any RTE species known to the ecologists or documented in the survey is considered in the planning process. In addition, any planned harvesting activity is reviewed by representatives from all relevant divisions of DNR, and Natural Heritage Inventory databases are referenced. Interviews with a number of NHC ecologists during field visits revealed descriptions of numerous surveys designed to assess rare species and important indicator species. Along the Mississippi River corridor birds have been monitored to assess importance of blocks of mature forest for migrants. An ongoing survey project, conducted jointly by DOF and NHC, involves a survey of ephemeral ponds.</p>
<p>6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	C	<p>As above, pre-management reviews are conducted with an integrated team of personnel. Also, Form 2460 is required as part of a timber sale. This forms lists, among other things, descriptions of a number of ecological considerations, and the appropriate management response. Several sites visited during the audit had known occurrences of the timber rattlesnake and wood turtle, both listed species, leading to restriction of logging to the winter months.</p>
<p>6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.</p>	C	<p>These priorities are evident when reviewing a number of Form 2460s and observing the close working relationship among DNR foresters, wildlife and fisheries biologist, and NHC ecologists.</p>
<p>6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	C	<p>Obviously, on lands managed by the same Department that controls hunting, fishing, and trapping, risks to vulnerable communities and species are minimized. A caveat, however, is that the state legislation can override recommendations from DNR concerning harvest regulations for wildlife, and this has been a concern for the numbers of deer in the state and effects of over-browsing on the forest community.</p>
<p>C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	C	
<p>C6.3.a. Landscape-scale indicators</p>		
<p>6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented successional stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>	C	<p>Auditors visited numerous sites where management activities were designed to maintain or restore under-represented forest types or age classes. On an experimental basis, some stands are being managed to accelerate old-growth forest structure. Active burning programs in SNAs are implemented to maintain open wetland and barrens type habitats. DNR also cooperates with the USFWS to shear decadent alder habitat to provide early successional habitat for wildlife species (American woodcock and golden-winged warbler).</p>
<p>6.3.a.2. When a rare ecological community is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, conservation zones and/or protected areas are established where warranted.</p>	C	<p>If a rare ecological community is present, it is identified in the state's NHI database, at which point the land manager consults with an ecologist in the Bureau of Natural Heritage Conservation to develop appropriate management options. More commonly, rare communities are already identified and may be part of an SNA, with a management plan developed to feature a viable community.</p>

<p>6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate). On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 	<p>C</p>	<p>DNR is very aware of the importance of identifying and protecting old-growth forests. To that end, systematic reconnaissance of all forest stands on state lands uses three codes to designate different levels of late successional forests: relict forest, old-growth forest, and old forest. The relict forest designation corresponds to FSC Type 1 old growth; these forests are also coded as reserved. DNR also has developed an Old-Growth and Old Forest Handbook to assist in the assessment, classification, and management of old forests. In short, the Department is demonstrating exemplary efforts to protect to promote old-growth forest stands of a range of forest types.</p>
<p>6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>C</p>	<p>DNR’s forest management goals are ecologically oriented, and management is conducted to maintain ecological habitat conditions that are suited to each site. These decisions are aided by the habitat classification that is done as a component of reconnaissance surveys for each site. Sites visited by auditors routinely had prescriptions that would allow natural regeneration and succession to occur on the site. For example, stands of planted pines on sites better suited for hardwoods are being allowed to succeed to hardwoods by natural regeneration.</p>
<p>6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ol style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed 	<p>C</p>	<p>Revisions to the Wisconsin Best Management Practices took effect in 2011; these specify additional protection for all wetlands, particularly seasonal wetlands, many of which are small but some of which are ecologically significant; foresters and loggers are aware of these provisions and work to implement them.</p>

<p>in adjacent aquatic habitats;</p> <p>c) habitat for species that use riparian areas for feeding, cover, and travel;</p> <p>d) habitat for plant species associated with riparian areas; and,</p> <p>e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</p>		<p>Sale and/or harvest unit boundaries are designed to avoid or buffer wetlands, stream, lakes, and other water bodies. Riparian buffers associated with harvests are shown on maps and marked on the ground. Confirmed by field observations that non-forested wetlands are protected by excluding them from sales where possible, and by buffering them using special colors of paint to indicate “no harvest” or “no equipment,” or by not marking any trees for harvest. Field audits in 2013 confirmed that foresters are knowledgeable of BMP requirements to protect riparian zones and are doing an excellent job of implementing them on harvest sites.</p>
<p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	C	<p>Management prescriptions for sites visited in 2013 were consistently written to enhance or maintain current or desired composition of plant species on the site. Selective management techniques such as controlled burning and use of herbicides are commonly employed.</p>
<p>6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>	C	<p>Planting stock is provided by Wisconsin state nurseries, and seed sources are local.</p>
<p>6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <p>a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and</p> <p>b) vertical and horizontal complexity.</p> <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>	C	<p>DNR personnel employ written silvicultural guidelines for retaining structural diversity in even-aged management systems. Personnel attended training to gain understanding and application of the new green tree retention standards. Based on recent revisions to the wildlife chapter in the Silviculture Manual foresters are marking more leave trees (individual) and painting off more pockets or clumps of leave trees, especially around wetlands. The definition of Legacy trees is working its way into the silviculture handbook. The new provisions, which they are using already, require that legacy trees be described in the 2460 narrative and then indicated in the Wis FIRS database.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>	C	<p>DNR foresters routinely retain green trees in a harvest by prescription and by marking wildlife trees. In addition, native vegetation is retained in riparian buffers and in retention islands. The Silviculture Handbook, Section 24-17, has detailed guidelines for retention of trees in managed stands.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 	C	<p>There are no opening-size limits for the Lake States-Central Hardwoods region.</p>

<p>4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species.</p> <p>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</p>		
<p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <i>invasive species</i>, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	C	<p>Auditors consistently observed efforts to limit the introduction and spread of exotic plants. Many contracts specify that logging equipment is cleaned before harvest is initiated. Staff are well-trained in invasive species BMPs. DNR monitors the effectiveness of their control measures and routinely make changes to methodology to control invasive species. Parks are especially active in controlling invasive species. Recon inventories, at least every 10 years, document the nature and extent of invasive species.</p> <p>DNR developed, in response to legislative directives, A Statewide Strategic Plan for Invasive Species. Invasive plants are a widespread problem on state lands, but DNR employees are well trained to identify and respond to the need for management.</p>
<p>6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	C	<p>DNR uses prescribed fire in wildlife management work to maintain open habitat characteristics of lowland and upland habitat. Prescribed fires are planned and controlled to meet safety and risk requirements. Many DNR personnel are certified fire fighters, and respond to wildfires when necessary.</p>
<p>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>		
<p>6.4.a. The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the <i>landscape</i> (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) <i>GAP analyses</i>; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p> <p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p>	C	<p>DNR has identified ecosystems that occurred naturally across the landscape. A GAP analysis has been completed and Wisconsin's SNA program has documented locations of native ecosystems and have protected many of these sites as SNA's. Details of criteria for establishing SNAs are presented in NR 44, Chapter 100, "Establishing State Natural Area."</p>
<p>6.4.b. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p> <p>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p>	C	<p>The state's SNA program is still filling gaps in the protected area network and has identified candidate sites to be added to the network. When sites are identified as future SNAs they go through an evaluation process (usually a biotic inventory) and are then ranked as to their uniqueness in representation of the representative sample ecosystem. The network of SNAs in Wisconsin include representative sample areas that address purposes 2 and 3 (See NR 44.100.10).</p>
<p>6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except</p>	C	<p>SNAs are not exclusively passive management. Management plans where SNAs are present document the management activities that</p>

<p>under the following circumstances:</p> <ul style="list-style-type: none"> a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated. 		<p>will be allowed on individual SNAs. Some examples of management on SNAs include the use of fire to retain open habitat conditions and/or to encourage fire-tolerant species. Selective harvesting to favor species such as black oak and pitch pine is also used. The SNA website outlines management activities that are allowed on SNAs (http://dnr.wi.gov/org/land/er/sna/napc.htm).</p>
<p>6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p>	<p>C</p>	<p>Established in 1985 by the Wisconsin legislature, Wisconsin's Natural Heritage Inventory program (NHI) is part of an international network of inventory programs. The program is responsible for maintaining data on the locations and status of rare species, natural communities, and natural features throughout the state. Species and natural communities tracked by the Wisconsin NHI Program can be found on the NHI Working List. New locations of rare species and communities are entered into the NHI database as they are found. The list is updated regularly (at least every 5 years). In addition, county inventories are being conducted as the first step in master planning, where NHC ecologists survey a wide array of vertebrates, invertebrates, and plants.</p>
<p>6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p>	<p>C</p>	<p>Where possible, the SNA program in WI identifies the largest stands and or blocks of representative ecosystems that are present on the landscape. Wisconsin has a program to identify and protect LSNA (Landscape Scale Natural Areas), which are required to be 640 acres in size.</p>
<p>C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</p>	<p>C</p>	
<p>6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	<p>C</p>	<p>The Wisconsin "Forestry Best Management Practices for Water Quality" is one of the best, if not the best, written guidelines for controlling erosion and protecting water and wetlands.</p>
<p>6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	<p>C</p>	<p>Wisconsin BMPs are required by timber sale contracts and were in place at all sites, inspected during the audit, notwithstanding a minor leak of hydraulic fluid at one site (See 6.7.a)</p>
<p>6.5.c. Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations 	<p>C</p>	<p>Confirmed by interviews with foresters and review of records that timber harvest planning considers weather events, with some sites on dry sands intended for the wet time of year, other sites identified for only dry weather, and other sites only for frozen ground.</p> <p>BMPs are monitored by sale administration foresters, who ensure that provisions of contracts and BMPs are applied. Every 3 to 10 years the DNR conducts a systematic assessment of BMP compliance on public lands. This was last done in 2003 (report reviewed by previous audit teams).</p> <p>Water quality considerations including lakes or rivers potentially affected by the harvest are documented for each proposed harvest on Form 2460, and this information is reflected in the harvesting requirements within the timber sale contracts. Sale and/or harvest unit boundaries are designed to avoid or buffer wetlands, stream, lakes, and other water bodies. Riparian buffers associated with harvests are shown on maps and marked on the ground. Streams, lakes and other water bodies and riparian zones are mapped, and are marked on the ground (red paint on trees) near harvests as</p>

<p>is only done when research indicates soil productivity will not be harmed.</p> <ul style="list-style-type: none"> • Low impact equipment and technologies is used where appropriate. 		<p>appropriate.</p>
<p>6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 	<p>C</p>	<p>Auditors inspected numerous roads, skid trails, and recreational trails. None were determined to be out of conformance with guidelines in the Wisconsin BMP Manual or with this indicator.</p>
<p>6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written Streamside Management Zone (SMZ) buffer management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>	<p>C</p>	<p>Streamside buffers are described in detail in the BMP guidelines. For most streams, buffers are 100 feet (35 feet for streams less than 3 feet wide), and there are several guidelines for management within SMZ buffers. DNR land managers were routinely found to be in conformance with expected protection of streams and streamside habitat.</p>
<p>6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>	<p>C</p>	<p>While there are conditions where foresters are encouraged to use good judgment while operating in SMZs, most commonly auditors found that little or no harvesting activity took place in buffered areas.</p>
<p>6.5.f. Stream and wetland crossings are avoided when possible.</p>		<p>Streams and wetlands were rarely crossed in the districts (south</p>

<p>Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of aquatic habitat. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	<p>C</p>	<p>western, south central, south eastern) audited in 2013.</p>
<p>6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	<p>C</p>	<p>Wisconsin’s public forests provide an exceptionally expansive and diverse range of recreation opportunities, and the state lands within the scope of this audit contribute to this diversity. Recreation use follows the same guidelines for protecting soil and water as does forest harvesting.</p>
<p>6.5.h. Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	<p>C</p>	<p>Grazing is not normally allowed near streams, and is uncommon on this land base. Short-term “restoration” grazing on a small portion of Leola Marsh included fencing to protect wetlands/riparian areas.</p>
<p>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	<p>C/NC</p>	
<p>6.6.a. No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	<p>C</p>	<p>Auditors examined records of pesticides used during calendar year 2012 and found no instances of use of chemicals on the FSC list of Highly Hazardous Pesticides.</p>
<p>6.6.b. All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>	<p>C</p>	<p>DNR has an intranet site that describes policies, procedures, required training and certification, as well as requirements for written plans and record keeping. Managers are applying herbicides in a wide range of conditions to control many different invasive plant species. Interviews and review of documents showed that programs are in place to assure that laws, regulations, policies, and procedures are followed. Because many of these control efforts are relatively new, managers (working in some cases with contractors or suppliers) are testing various combinations of practices in very challenging treatment situations. For example uncommon, rare, or protected plants can be growing intermixed with target (invasive) species. The best control strategies, including chemical and non-chemical treatments in of varied timing and/intensity, are still being worked out for many different invasive control scenarios. More could be done to ensure that minimized pesticide use is pursued, and that best-practices and improved techniques for control of invasive plants are effectively and efficiently shared across work units and disciplines. See OBS 2013.1. On some sites visited during the audit, herbicides were applied multiple times, generally due to intractable issues with invasive plants in the understory of stands targeted for regeneration; for example: Tamarack Locust Site: 24 acres where all locust trees were girdled and sprayed with a 5% solution of Transline herbicide in water. Trees too small to girdle were killed with a basal bark treatment of element 4 in a 15% solution of oil. All merchantable locust and a small amount of red pine were harvested in the summer of 2012. Some regrowth occurred which was foliar sprayed with ½ ounce Transline per gallon of water. The site was mulched in the spring of 2013, foliar sprayed</p>

		with Makaze in summer 2013 at a rate of 6 quarts/acre (this treatment did not appear to be effective). Element 3 mixed in a 5% solution with water will be applied in August to take out any additional plants (there are many).
6.6.c. Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.	C	Managers are applying herbicides in a wide range of conditions to control many different invasive plant species. Because many of these control efforts are relatively new, managers (working in some cases with contractors or suppliers) are testing various combinations of practices in very challenging treatment situations. For example uncommon, rare, or protected plants can be growing intermixed with target (invasive) species. The best control strategies, including chemical and non-chemical treatments in of varied timing and/intensity, are still being worked out for many different invasive control scenarios.
6.6.d. Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.	NC	DNR responded to a CAR in 2011 by forming a Pesticide Use Team, which has revised manuals, developed a training plan, and established better channels for communication and reporting. Numerous workers were interviewed during the 2013 audit about training, and training records were inspected. Staff who apply chemicals appear to be in full conformance with expectations for training. Written prescriptions are now filed on line before use of chemical pesticides, but auditors found inconsistency in filing of maps of treatment areas. See Minor CAR 2013.2
6.6.e. If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.	C	Adequate requirements for record-keeping are posted on DNR's intranet. Adaptive management for control of invasive species also is a product of the Citizen's Advisory Committee on Invasive Species.
C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C/ NC	
6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	NC	DNR policy is for employees and contractors to call the DNR Hazardous Spill Coordinator for spills that meet or exceed the minimum reportable quantities (1 gallon for gas and 5 gallons for diesel/hydraulic fluid). One auditor observed an on-going, minor leak of hydraulic fluid from the loader arm of the forwarder (initial spray onto ground and onto rear of forwarder, then about 2 drops per minute continued). There was no spill kit on site. Two mechanics arrived with a spill kit at least 40 minutes after the auditor arrived on site (unknown how much time elapsed between the leak and the arrival of the auditor). See Minor CAR 2013.3.
6.7.b. In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	Visual observation of the gas and diesel tank equipment and enclosures located at the North and South units of the Kettle Moraine State Forests confirmed that absorbent material for use on spills was nearby. Interviews with DNR personnel indicate they follow the containment instructions in the state BMP manual for small spills and contact the Hazardous Spill Coordinator for larger spills. See Indicator 6.7.a; this "spill" was quite minor. The logger on site did not attempt to stop or contain the drip, but mechanics were called and took appropriate measures while the auditor was on site.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water	C	Visual observation of the gas and diesel tank equipment and enclosures located at the North and South units of the Kettle Moraine State Forests confirmed that they are double lined tanks with visible leak detection alarms. The tanks at the Northern unit were enclosed in spill containment structures. Neither set of tanks were located near any water bodies and no evidence of spill was observed.

contamination.		
C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	C	
6.8.a. Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i> , insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.	C	Andrea Diss-Torrance met with the audit team. She is a Forest Health Specialist who works on statewide programs for control of forest pests. DNR employs forest health specialists and makes their services readily available to the field units. They also work closely with forest pest specialists at University of Wisconsin, Madison and Stevens Point. Pest updates published quarterly: http://dnr.wi.gov/topic/ForestHealth/Publications.html
6.8.b. If biological control agents are used, they are applied by trained workers using proper equipment.	C	DNR did not report that any biological control agents were used on state lands in 2012. Biological agents have been used in the past, however, and guidelines are in place to assure that applicators are properly trained, whether DNR employees or
6.8.c. If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.	C	DNR has a staff of 15 forest pest specialists. The majority of these specialists work on statewide projects, coordinating with federal agencies where applicable. Written plans are required and must be approved by USDA APHIS.
6.8.d. Genetically Modified Organisms (GMOs) are not used for any purpose	C	DNR reported that no GMOs are being used for any purpose.
C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	Only native tree species are planted on DNR state lands, and seed sources are local. Where grasses and other herbaceous vegetation are planted on log landings or openings for wildlife, approved seed mixes are used. Any non-native species in these mixes are known not to be invasive.
6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	None used, so not applicable.
6.9.c. The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	No examples surfaced during the audit to suggest the need for such actions.
C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.	C	
6.10.a. Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	A new campground at the Buckhorn State Park has an overall footprint of about 5 acres, with a small portion of this area cleared for roads and infrastructure. The campground will remain wooded; no conversion.
6.10.b. Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	Prior to construction of the campground at Buckhorn State Park, two NHC ecologists spent 1 field day on this small site. The design was modified to avoid an eagle's nest.

<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>Camping and other recreational activities are the primary purpose of state parks, so minor conversions to non-forested uses do occur on occasion. Campers receive information about conservation.</p>
<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	<p>C</p>	<p>Instead, many plantations are being used to restore sites and move vegetation towards more natural conditions.</p>
<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)</p>	<p>C</p>	<p>Master Planning, Interim Forest Resource Plans, and site level planning include careful reviews of stand-type changes. Conversions to non-forest conditions are driven by ecological restoration goals. Many sites in southern Wisconsin are former prairie or savanna types that have had encroachment by trees. Natural disturbance regimes, mainly periodic ground fires at irregular intervals, have been disrupted, which has caused these formerly open landscapes to afforest naturally. Conversions are designed to restore natural conditions consistent with natural range of variability and disturbance regimes.</p>
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	<p>C</p>	<p>No such instances of conversion of forest land for mineral or gas development were reported to the auditors.</p>
<p>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>C7.1. The management plan and supporting documents shall provide: a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species. h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.</p>	<p>C</p>	
<p>7.1.a. The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	<p>C</p>	<p>Wisconsin Administrative code, NR 44, outlines in detail the requirements for master planning for department properties. NR 44.04 addresses the requirement for describing ownership of the forest (confirmed in review of 2010 plan for Black River State Forest). Some details about legal status and rights are maintained by staff in</p>

		Central Office and are not included in individual master plans.
7.1.b. The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).	C	Wisconsin Administrative code, NR 44.05 lists required elements of a property master plan, addressing most of the items in this indicator. A review of plan for Coulee Experimental State Forest confirms the inclusion of land-use history, current forest types, successional stages, and natural disturbances. More specific descriptions are presented for individual sale units when harvesting is planned (Form 2460).
7.1.c. The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.	C	These elements of the management plan are found in the WISFirs database, which includes inventory data and desired future conditions, as well as on Forms 2460 (several reviewed during field audit). The Black River State Forest master plan presents both current and predicted future land cover for each of its management zones.
7.1.d. The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.	C	Wisconsin Administrative code, NR 44.05 requires that master plans contain a description of the landscape. Landscape-scale habitat elements are clearly identified as separate land management areas in plans (e.g., Coulee Experimental State Forest plan, 2009)
7.1.e. The management plan includes a description of the following resources and outlines activities to conserve and/or protect: <ul style="list-style-type: none"> • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9); • Other special management areas. 	C	Wisconsin Administrative code, NR 44.06, 44.07, and 44.10 addresses most of these elements, requiring their inclusion in master plans. The Coulee Experimental State Forest and Black River State forest plans contains discussions of all of these topics, with representative sample areas and HCVF addressed through management of State Natural Areas and special management categories for native communities.
7.1.f. If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).	C	Management of invasive species is a common inclusion in management plans at all levels of DNR planning. Starting with a Statewide Strategic Plan for Invasive Species, the Public Forest Lands Handbook, individual property master plans (e.g., Black River SF), and Form 2460 assessments. Individual plans are required for specific management actions, such as herbicide use (e.g., Hogback SNA)
7.1.g. The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).	C	NR 44.06(10) c.3, requires that insects and diseases are addressed in master plans. Master plans, like Black River State Forest present a general discussion of forest health, but more specific information is presented in Form 2460 assessment, which are more time specific.
7.1.h. If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.	C	All Divisions and Bureaus in DNR require that plans are submitted before chemicals are used. Although auditors found some inconsistency in the content of such plans (see 6.6.d), most of the plans examined during the audit were in conformance with 6.6.
7.1.i. If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.	C	Use of biological controls is generally addressed in Wisconsin Forest Management Guidelines (one of a number of documents comprising the management plan), but more specifically on a pest-by-pest basis. DNR has a competent and active team of forest health specialists who produce annual assessments of disease and insect pests, quarterly publications that summarize plans for control, and annual reports of assessments and control efforts. A Forest Health web page provides numerous such documents.
7.1.j. The management plan incorporates the results of the evaluation of social impacts, including: <ul style="list-style-type: none"> • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); 	C	NR 44 (07), outlines requirements for obtaining public input into master planning for department properties. Evidence of conformance is obvious in review of master plans (four during the audit). The Division of Forestry has an Education and Outreach Strategic Plan, and the Forest Planning web page provides details on submitting comments on draft plans. Interviews with DNR planners confirm that the Department takes communication with the public seriously, and there is a competent staff to implement the strategic plan.

<ul style="list-style-type: none"> public access to and use of the forest, and other recreation issues; local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g). 		
<p>7.1.k. The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</p>	C	<p>NR 44 (07) requires that the transportation system is described in master plans. Review of Black River and Coulee SF plans confirm that roads and trails are addressed. Annual work plans for each property propose needed improvement and maintenance.</p>
<p>7.1.l. The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.</p>	C	<p>The Division of Forestry maintains an excellent Silvicultural Handbook (738 pages). It is a dynamic document that is updated periodically. A Silviculture Guidance Team has recently been appointed for reviewing and updating the Silviculture Handbook. The team is comprised of representatives from various facets of the forestry community, rather than just staff from the Division of Forestry.</p>
<p>7.1.m. The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.</p>	C	<p>These descriptions would be found, in general, in a master plan for a particular property or group of properties. Details would be found in WIFirs, by specific query.</p>
<p>7.1.n. The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.</p>	C	<p>Chapter 100 of the Public Lands Handbook outlines procedures for stand inventory. The website for master planning (dnr.wi.gov/topic/lands/masterplanning) describes the WisCFI monitoring system and presents an abundance of reports about the forest resources: e.g., volume of growing stock, sawtimber volume, acreage by forest type, even volumes of coarse woody debris, and extent of invasive species. Although this information relates to the Division of Forestry, other administrations also use the WisCFI system and collect the same information.</p>
<p>7.1.o. The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.</p>	C	<p>NR 44 (08) outlines requirements for describing the resource base and Management Areas. Review of master plans for Coulee and Black River State Forests confirms that these requirements are met and are in conformance with the indicator. For instance, the Black River SF plan identifies the following management areas: Forest Production, Habitat, Native Community, Recreation, and State Natural Areas.</p>
<p>7.1.p. The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.</p>	C	<p>Wisconsin Forest Management Guidelines (Chapter 13) discusses harvesting machinery appropriate for different sites and objectives. Inspection of pre-harvest plans and prescriptions during field visits revealed examples where foresters had specified type of harvesting equipment in special cases.</p>
<p>7.1.q. Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.</p>	C	<p>A 219-page Timber Sale Handbook provides guidance for the establishment of timber sales, including the marking of trees to be cut or retained. More specific information is prepared for each sale, using Form 2460, and the information required by this form addresses the elements of this indicator. Numerous 2460 forms were reviewed by auditors during visits to harvest sites.</p>
<p>7.1.r. The management plan describes the stakeholder consultation process.</p>	C	<p>NR 44 (07), outlines requirements for obtaining public input into master planning for department properties. Each master plan has a section entitled "Public Communications Plan (e.g., Coulee and Black River SF).</p>
<p>C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>		
<p>7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate</p>	C	<p>This requirement has been the subject of recent Corrective Action Requests. While State Forest master plans are mostly current, the</p>

<p>the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.</p>		<p>large number of smaller State Parks and Wildlife Areas, Fisheries Areas, etc. added to the certified lands base 5 years ago are still without plans that conform to the requirement of NR44. However, substantial progress is being made and a schedule has been established for completing and maintaining plans for all properties in accordance with the expectation of this indicator.</p> <p>In 2012, the state Natural Resources Board approved master plans for 36 properties, with 25 more currently part of an active master planning project. 93 of 313 properties which require a NR 44-compliant Master Plan have one; this includes many of the largest properties.</p> <p>As of May 2013, Eighty-one (81) Interim Forest Management Plans had been written for 178 properties covering 407,000 acres.</p>
<p>C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</p>	<p>C</p>	
<p>7.3.a. Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.</p>	<p>C</p>	<p>Auditor requested evidence of the education and training for selected WDNR personnel across the range of agencies involved in the audit. Training records) indicated that employees obtain varied training, ranging from agency-provided meetings up to major conferences and even college-level courses. Interviews with professional staff showed most had 4-year degrees and many have advanced degrees in relevant natural resources fields. Management foresters, ecologists, and biologists interviewed during field visits demonstrated competence in both preparing and implementing plans.</p>
<p>C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</p>	<p>C</p>	
<p>7.4.a. While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.</p>	<p>C</p>	<p>Wisconsin DNR has an excellent web page (http://dnr.wi.gov/topic/ForestPlanning), where plans in both draft and final form are posted for public review.</p>
<p>7.4.b. Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.</p>	<p>C</p>	<p>Wisconsin DNR has an excellent web page (http://dnr.wi.gov/topic/ForestPlanning), where plans in both draft and final form are posted for public review.</p>
<p>P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p>C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p>	<p>C</p>	
<p>8.1.a. Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring</p>	<p>C</p>	<p>Monitoring protocols are described in relevant handbooks as appropriate for the resource being monitored.</p>

protocol.		
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	<p>Wisconsin Forest Inventory Reporting System (WisFIRS), Public Lands Handbook chapter 100</p> <p>The main timber inventory is done through forest compartment reconnaissance (recon). Recon is a stand level assessment used to populate the Wisconsin Forest Inventory Reporting System (WisFIRS). Plots include measurements of species, volume (merchantable log tally and basal area reading), stocking, site index, timber quality, and general forest conditions.</p> <p>Recon is done on an as needed basis depending on several triggers (timber sale establishment, closeout, land acquisition, etc.) but no longer than every 15 years on state land.</p> <p>DNR has also started a Continuous Forest Inventory system on state forests only. Started in 2007, the first 5 year report has been completed, "Wisconsin Continuous forest Inventory Report." The CFI system captures more in-depth information than the recon, but is done on an annual basis for a smaller area.</p>
8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	<p>Example includes large blowdown in the northwest. Recon should be conducted after large scale loss events to reassess timber volumes. Since DNR operates on an area control rather than volume, timber loss in cert</p>
8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	<p>Post-harvest reports in the WisFIRS system capture records of harvested material.</p>
8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their habitats; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4). 	C	<p>CFI captures data on plant communities.</p> <p>Invasive species monitoring currently done as part of recon. Recommendations in the statewide strategic plan for invasives call for a more all-encompassing approach that would incorporate monitoring from members of the public.</p> <p>State Natural areas are monitored through inspection reports.</p>
8.2.d.1. Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.	C	<p>Monitoring of this type is done through timber sale administration. The Timber sale handbook details how active timber sales are reviewed and closed out. Individual reports are prepared as part of monitoring visits.</p>
8.2.d.2. A monitoring program is in place to assess the condition	C	<p>Interviews with facilities managers indicate that road monitoring is an</p>

and environmental impacts of the forest-road system.		ongoing process. DNR recently completed a formal review of roads and parking lots and identified areas for improvement.
8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	Statewide forest action plan looks into detail of effects of timber on state economy, updated every 5 years, looking at state of forest products industry, salaries of foresters, etc. DNR has daily interaction with state forest products sector.
8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.	C	Stakeholder responses are reviewed on a property level as part of annual management planning process.
8.2.d.5. Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	Opportunities for joint monitoring are provided to local tribes.
8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	Although financial return is not the primary motivation of the state agency, revenue and costs are tracked and detailed as part of standard financial record keeping.
C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	C/NC	
8.3.a. When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	NC	Wisconsin DNR maintains a chain of custody system based on standard log load ticket system. DNR typically sells standing timber, with ownership of certified material changing when it is cut. Please see Minor CAR 2013.4.
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	Haul tickets contain the required information at a sufficient detail to enable tracking of certified material.
C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.		
8.4.a. The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	C	Regular monitoring of objectives occurs with timber sale monitoring, recon, etc.
8.4.b. Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.	C	Review of management plans and objectives occurs at a tactical level as a part of timber sale administration, i.e. monitoring BMPS and shutting down jobs to protect forest resources if necessary. At a larger level, WISFIRs data is collected and management planning is adjusted when recon indicates a change in stand type or similar update.
C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	C	
8.5.a. While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	C	Results of monitoring activities are posted on DNR website, examples include state forest inventory report.

P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

High Conservation Value Forests are those that possess one or more of the following attributes:

- a) **Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance**
- b) **Forest areas that are in or contain rare, threatened or endangered ecosystems**
- c) **Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)**
- d) **Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).**

Examples of forest areas that *may have* high conservation value attributes include, but are not limited to:

Central Hardwoods:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >160 years old (a)
- Municipal watersheds –headwaters, reservoirs (c)
- Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)
- Intact forest blocks in an agriculturally dominated landscape (refugia) (a)
- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens (c)
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern (b)

Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.

In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.

Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.

Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.

Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.

C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest	C	
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<p>management.</p>		
<p>9.1.a. The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	<p>C</p>	<p>There is a significant overlap of State Natural Area and HCVF designation. All areas on DNR-managed lands that are determined to be HCVF are also contained in SNAs. Furthermore, the process that led to SNA designation includes all lands within an ecological landscape, adjacent to the FMU or not. In particular, DNR works with national forests, The Nature Conservancy, and county land managers to manage high conservation forests and other land types. Fully one-third of State Natural Areas are on land owned by partners. These areas have been identified and mapped and are contained in the NHI database. 653 designated State Natural Areas safeguard 358,000 acres of land and water.</p>
<p>9.1.b. In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.</p>	<p>C</p>	<p>Wisconsin has the nation’s largest and oldest natural areas protection program. The Natural Areas Preservation Council, an independently appointed, 11-member body created by state law in 1951, advises DNR about the establishment, protection and management of State Natural Areas. DNR has undergone extensive review and assessment of HCVF within the SNA program.</p>
<p>9.1.c. A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.</p>	<p>C</p>	<p>An Ecological Landscape Handbook for Wisconsin is still in preparation, but the chapters that have been finished are available on the DNR website. The handbook presents the result of analysis of 16 landscape types in Wisconsin. Individual master plans identify the landscapes that are relevant to the plan and present management options for SNAs (including HCVF) present on the planning unit.</p>
<p>C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	<p>C</p>	
<p>9.2.a. The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.</p>	<p>C</p>	<p>Biotic inventories of areas that will undergo master planning are completed prior to planning activities. HCVFs are identified and mapped by staff and also with stakeholders and regional experts, through the Natural Areas Preservation Council. Appropriate measures to maintain HCVF attributes are developed. A dedicated staff of ecologists in the Bureau of Natural Heritage Conservation works to carry out management plans to conserve or restore the attributes of HCVF. Several examples were inspected during the field audit (oak savannah on Bottle Bluff SNA and jack pine barrens on Gotham Sands SNA).</p>
<p>9.2.b. On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.</p>		<p>All NR 44 compliant master plans go through an extensive public review process. Master plans include sections on high conservation value sites and their proposed management. In addition, the Natural Area Preservation Council is comprised of 11 members of the public with backgrounds in biological and natural science.</p>
<p>C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	<p>C</p>	
<p>9.3.a. The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>	<p>C</p>	<p>Management plans identify when special circumstances occur that require a modification to the general forest management prescriptions in order to maintain and enhance those unique features. On the Black River State Forest, there are 10 SNAs totaling 4,892 acres. Some of these SNA have freestanding management plans, but most fall with the Land Management Areas defined by the master</p>

		plan. SNA ecologists work closely with forest managers to assure that the high conservation values are maintained. Numerous examples of this working relationship were documented by auditors (e.g., barrens management for Karner Blue Butterfly on Black River State Forest.
9.3.b. All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	C	DNR is careful in protecting HCVFs for their attributes. Some individual species management plans have been written and utilized to protect HCVF (old-forest characteristic management). The SNA website presents short management objectives for most sites.
9.3.c. If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	C	DNR also cooperates with Chequamegon-Nicollet National Forest, numerous HCVF forest lands, and some private landowners in managing HCV sites. A review of SNAs described on the website shows that many are co-managed.
C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a. The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	The SNA web site has an inspection report that is filled out whenever significant changes occur on the site/or when a site is visited. Most sites are inspected at least every other year (with the exception of very remote sites that are difficult to access). Although formal monitoring many not occur annually, virtually all SNA sites are visited by DNR personnel or cooperators capable of reporting any significant changes in the attributes of the SNA, e.g., serious invasion of unwanted plants or animal, storm damage, unauthorized site disturbance.
9.4.b. When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	The inspection report identifies risk to the HCVF attribute (presence of invasives) and appropriate measures are taken to control the risks to the HCVF attributes on the site.

Appendix 6 – Tracking, Tracing and Identification of Certified Products

SCS FSC Chain of Custody Indicators for Forest Management Enterprises, Version 5-0

REQUIREMENT	C/NC	COMMENT / CAR
1. Quality Management		
1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.	C	The Forest Certification Coordinator for the state is the designated management representative.
1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	Timber sale handbook requires record retention for this long.
1.3 The FME shall define its forest gate(s) (check all that apply): <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i>		<p>Stump</p> <p><input checked="" type="checkbox"/> <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.</i></p> <p>On-site concentration yard</p> <p><input type="checkbox"/> <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p>Off-site Mill / Log Yard</p> <p><input type="checkbox"/> <i>Transfer of ownership occurs when certified-product is unloaded at purchaser’s facility.</i></p> <p>Auction house / Brokerage</p> <p><input type="checkbox"/> <i>Transfer of ownership occurs at a government-run or private auction house / brokerage.</i></p> <p>Lump-sum sale / Per Unit / Pre-Paid</p> <p><input type="checkbox"/> Agreement <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.</i></p> <p>Log landing</p> <p><input type="checkbox"/> <i>Transfer of ownership of certified-product occurs at landing / yarding areas.</i></p> <p><input type="checkbox"/> Other (Please describe):</p>

<p>1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.</p>	<p>C</p>	<p>Since DNR sells standing trees, the stump and the gate are the same. Thus there is little risk of mixing while the material is in DNR's chain of custody.</p>
<p>1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or debarking units, small portable sawmills or on-site processing of chips / biomass originating from the FMU under evaluation.</i></p>	<p>C</p>	<p>No processing of material occurs under the scope of this certificate.</p>
<p>2. Product Control, Sales and Delivery</p>		
<p>2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).</p>	<p>C</p>	<p>Timber sales are advertised as FSC certified. All forestland managed by DNR is covered under the certificate.</p>
<p>2.2 The FME shall maintain records of quantities / volumes of FSC-certified product(s).</p>	<p>C</p>	<p>Records of all timber sales and volumes are kept.</p>
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> a) name and contact details of the organization; b) name and address of the customer; c) date when the document was issued; d) description of the product; e) quantity of the products sold; f) the organization's FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: <ul style="list-style-type: none"> i. the claim "FSC 100%" for products from FSC 100% product groups; ii. the claim "FSC Controlled Wood" for products from FSC Controlled Wood product groups. h) If separate transport documents are 	<p>C</p>	<p>Timber sale documentation includes all required information, although one prospectus used the outdated "FSC Pure" claim.</p>

<p>issued, information sufficient to link the sales document and related transport documentation to each other.</p>		
<p>2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product. Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2</p>	C	
<p>2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company’s webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria:</p> <ul style="list-style-type: none"> a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence. <p><i>FSC-ADVICE-40-004-05</i></p>	NA	
<p>3. Labeling and Promotion</p>		<input type="checkbox"/> N/A
<p>3.1 Describe where / how the organization uses the SCS and FSC trademarks for promotion.</p>	C	<p>Certification marks are used on the DNR website and in timber sale documentation only.</p>

3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.	NC	Please see Minor CAR 2014.4
3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.	C	
4. Outsourcing		<input checked="" type="checkbox"/> N/A
4.1 The FME shall provide the names and contact details of all outsourced service providers.		
4.2 The FME shall have a control system for the outsourced process which ensures that: <ul style="list-style-type: none"> a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use. 		
5. Training and/or Communication Strategies		
5.1 All relevant FME staff and outsourcers shall be trained in the FME’s COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME’s COC control system.	NC	<p>A timber sale prospectus sheet from May 2013 demonstrated improper use of the FSC trademark requirements, in particular the out-of-date FSC claim language (FSC Pure rather than 100%). The language on the prospectus also misidentified the certified landbase as the “LWSR” rather than the Wisconsin DNR. The FSC logo was also used without required format.</p> <p>Interviews with field staff showed inconsistent knowledge of the chain of custody requirements, answering that either claim could be used (100% or Pure).</p> <p>Please see Minor CAR 2013.5</p>

<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).</p>	<p>C</p>	<p>Although there has been no recent training, the CoC handbook has been revised.</p>
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