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

State of Wisconsin

Wisconsin Department of Natural Resources – State Forests and Lands

Wisconsin, USA

SCS-FM/COC-00070N

Client Address	101 S. Webster Street, PO Box 7921, Madison, WI 53707-7921 USA
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Client Website	dnr.wi.gov/topic/forestry.html

CERTIFIED	EXPIRATION
31 December 2018	30 December 2023

DATE OF FIELD EVALUATION
13-17 September 2021
DATE OF REPORT FINALIZATION
16 May 2022

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Foreword

Cycle in annual surveillance evaluations				
☐ 1st annual evaluation	☐ 2nd annual evaluation	☒ 3rd annual evaluation	☐ 4th annual evaluation	☐ Other (*expansion of scope, Major CAR audit, special audit, etc.*):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
Wisconsin Department of Natural Resources (WIDNR, DNR), Forestry Division (Forestry), Fish Wildlife & Parks (FWP).				

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual evaluations to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database http://info.fsc.org/.

Pursuant to FSC and SCS guidelines, annual / surveillance evaluations are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope evaluation would be prohibitive and it is not mandated by FSC evaluation protocols. Rather, annual evaluations are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual evaluation);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this evaluation; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the evaluation.

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 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 90 days after completion of the on-site evaluation. Section B contains more detailed results and information for required FSC record-keeping or the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

Auditor name:	Brendan Grady	**Auditor role:**	Audit Team Leader
Qualifications:	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 returning to SCS.		
Auditor name:	Shannon Wilks	**Auditor role:**	Team Auditor
Qualifications:	Mr. Wilks has over 27 years of professional experience in the forest industry. His roles have included procurement, supply chain management, contract negotiations and environmental management compliance. His experience includes 20 years with a global forest products company where he spent most of his career in the southern United States. He has also managed industrial properties with land management functions. Mr. Wilks is a Controlled Wood Senior Lead Auditor for FSC® Chain of Custody, Lead auditor for Sustainable Forestry Initiative (SFI®) Chain of Custody Standard, SFI® Fiber Sourcing, SFI® Forest Management Standard, Programme for the Endorsement of Forest Certification (PEFC®) Chain of Custody Standard and a Lead Auditor for Sustainable Biomass Program (SBP). Mr. Wilks is a graduate of Louisiana Tech University with a Bachelor of Science-Forest Management degree.		
Auditor name:	Tucker Watts	**Auditor role:**	Team Auditor
Qualifications:	Tucker Watts is a partner in Watts Consulting LLC. His primary focus is forest certification through auditing. Since 2008, Watts has been involved with SFI Forest Management, Fiber Sourcing, Certified Sourcing, and Chain of Custody auditing, FSC Forest Management and Chain of Custody auditing, Programme for the Endorsement of Forest Certification Chain of Custody auditing, auditing of the American Tree Farm System's Group certification, auditing of the Responsible Procurement Program of the National Wood Flooring Association and auditing of the Sustainable Biomass Partnership. Watts has 30 years of experience in forest management with a large forest products corporation involved in the manufacturing of paper, lumber and plywood. For 10 years, Watts was a system manager for the forest certification system.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation	4
B. Number of auditors participating in on-site evaluation	3
C. Number of days spent by any technical experts (in addition to amount in line A)	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up	2.5
E. Total number of person days used in evaluation	**14.5**

1.3 Applicable Standards

All applicable FSC standards are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS's Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS's COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements. "Applicable standards" are all FSC standards with which the certified entity must comply, not just the standards selected for evaluation this year.

Standards applicable *NOTE: Please include the full standard name and Version number and check all that apply based on type of certificate.*	☒ Forest Stewardship Standard(s), including version: FSC US Forest Management Standard, v1.0, 2010
	☒ FSC Trademark Standard (FSC-STD-50-001 V2-0)
	☒ SCS COC indicators for FMEs, V8-0
	☐ FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	☐ Other:

1.4 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. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

Date: 9/13/2021	
FMU / location / sites visited	**Activities / notes**
Remote via videoconference	Opening Meeting: Introductions; client summary of land sales/acquisitions, annual management activities, and stakeholder issues; review scope of evaluation; finalize audit plan; intro/update to FSC and SCS standards; confidentiality and public summary; conformance evaluation methods and review of open CARs/OBS; emergency and security procedures for evaluation team; final site selection.
Date: 9/14/2021	
FMU / location / sites visited	**Activities / notes**
Lacrosse Audit team - Auditor Shannon Wilks	Wood County Wildlife Area - Permits for firewood issued for Native American for Tamarack Poles used in ceremonial event. 1. Frazzled Feline -81 acres: Cut all trees marked in orange and other trees greater than 1 inch, except for white oak, white pine and red pine. Reserve all trees marked in red and green paint and dead trees without commercial value. Objective to regenerate aspen and oaks for wildlife benefits-ruffed grouse, white tailed deer. Harvesting completed winter 2020; began 2018- finagled in Spring 2020. SFI qualified Logging Professional certified. Successful bidder- review FISTA training to confirm. No treatments prescribed- hunter walking trail -General invasive species monitoring. Transitioned non forested habitat into WisFIRS around 2018. Ground monitoring was conducted. Regeneration monitoring scheduled for 3 years after completion. Aspen and oaks targeted regeneration species. No water features or crossings. Boundaries are identified with white metal signs. Red line buffer observed with no harvesting. Winter harvesting conducted. Active harvests are monitored 1-2 per week. Break-up more frequent to monitor ground conditions. Red and white pine reserved on front for species diversity. Observed snags and other vigorous oaks left for perch and wildlife. No BMP issues observed. Stand matched prescription and management plans. 2) Forgotten North - 54 acres: 5 cutting units-cut all trees greater 1 inch and greater except marked in green, red or blue paint. Objective is regeneration of early successional forest. Blue line boundary for private property. Oak trees left with evidence of oak wilt. Goal to transition stand from maples to oaks. Blanking turtle- specie of concern- buffer left in Sandy upland bank. Review of annual NHI- search of new species. listing of community types. Practices are input for mitigation. Annual review for one-time management activities. Completed harvesting in winter 2021.

	Qualified Logging Professional certified. Red buffer observed for stream- WI BMP require 35 ft for streams 1-3 feet wide. Larger streams require 100 buffer and minimum 60 basal area of long-lived species. Buffers can be modified based on site conditions and slopes. Buffer on stream met and exceeded minimum requirements. Stream dug in early 20th century and spoil pile lined stream banks on both sides. No evidence of soil movement or erosion. Flat topography. Knowledgeable personnel of BMP requirements. Adequate regeneration of aspen, oaks and maples observed. Utilized fiber adequate considering lack of pulpwood market. Lack of aspen left stacked. 3) Sandhill Wildlife Area HQ- Chemical Storage: SDS binder observed for 11 chemicals. Guide for use and mixture posted with PPE on top. Storage cabinet closed and within secure building. Krenite was oldest in storage-2008. Cases of unopened chemicals stored adjacent to cabinet. Roundup stored was different brand than SDS label. Biologist will review inventory and confirm. Review of chemical inventory list confirms 15 chemicals stored on-site with 7 missing SDS documents. Review of pesticide use policy and requirements. Triple rinse of containers and sent for recycling. Applicator for biologist #88538 expiration 7/31/23. Technicians have applicators license- not present. 4) Minotaur-76 acres: 2 cutting blocks- cut all Jack pine and oaks except those marked with green paint. Cut all red and white pine marked with orange paint. Leave 2-3 oaks per acre. Hardwood has 4-inch top spec and pine a 3-inch top spec. Primary objective is early successional forest. Township requested to increase buffer along road- expansion of 25-foot buffer. Township owns 25 ft from centerline of roads. Harvested in winter 2020-2021. Stand still open. Qualified Logging Professional certified. Blandings Turtle on NHI review- active season from March to October, no harvesting allowed dependent on habitat. Favor sandy type upland soils. Dry or frozen- time adjusted for turtle. Minimal damage to thinned area. Flat topography, no soil movement. Stream buffered by red painted line. 5) Sonic Boom-66 acres: 4 stands with no prior management. Even age harvest-regeneration. Stand 3 will be thinned to improve health. Stand 1, w and 10 will regenerate through coppice and seed. Stand 3 will have pockets of coppice and seed regeneration. Leave 3-5 white pines per acre in stand 1 for green tree retention. HRD restrictions- all pine stumps must be treated. Reserve all trees marked in green paint within west area; in eastern unit 2nd area-cut all red and white pine marked in orange, cut all oaks, maple, aspen and Jack pine. No activity on sale. Stand will be bid in Spring 2022. Observed regeneration of white pines in understory of stand 3. DNR personnel knowledgeable and discussed stand prescription and succession. Ground conditions matched maps and prescription. Lower quality pines marked in orange paint. Stand. 1

	and 2 observed. Green painted trees observed- primarily white pines. Red buffer painted along low/swamp area. 6 NHI occurrences- all mitigated. Observed blue painted exterior boundary. 6) Kracken- 34 acres: objective is early successional forest with emphasis on aspen management. Cut all aspen, maple, birch and Jack pine. Leave 2-3 mature oaks marked with green paint for wildlife-GTR. Verso purchased 2 + years ago. No activity was observed. Frozen ground restriction. Red painted buffers on lowlands/swamps. Red X painted areas designated for equipment. Significant swamps on stand. Occurrences noted within NHI-frozen ground will mitigate. Observed Lupine area in opening adjacent to road-Karen's Blue Butterfly habitat. Forester located habitat during pre-sale recon. Area will be protected and no equipment allowed in opening. 7) Cottontail -46 acres: 4 stands within 1 cutting unit. Objective is regeneration of Jack pine and oaks. GTR of 2-3 black oaks for wildlife per acre. Cut all trees not marked in green paint and 1 inch and larger trees. Oaks were dying and red maples were overtaking stand. KBB habitat potential. Jack pine stand is 47 years old. Oaks are ~98 years old. RMZ on Beaver Creek-100 ft. Ditches were buffered on stand with red painted lines. Stand is sold but not harvested at time of audit. 8) EW-50 acres: Cut all oak and Jack pine areas. Thin within pockets of red pine area-remove white pine, oaks and maple to enhance health. GTR of 3 or more white oaks and red pine; leave 1-2 oaks makes with green paint. Active sale but contractors not present at time of audit. Contractor farms cranberries- prep for harvesting. Newer Timberjack equipment with no evidence of hydrocarbon spills or leaks. Spills kits are mandatory part of presale inspection. E.Schwemmer Contractor-Qualified Logging Professional certified. No trash or trespass observed near deck. Pile of tie logs, oak/hardwood deadwood used for firewood and pine pulpwood. Approximately 40% of stand has been cut at time of site visit. Processor was harvesting area around 1st swamp. Good utilization of fiber and observation of leave trees. Snowmobile trail used for access. Potential for deer, grouse and songbird habitat. Stand will provide habitat for future brood of grouse. Observed pre-sale checklist and harvesting monitoring document. Biologist reviews proposal before sake is prepared. Consistent contract force in area that purchase sales. No BMP issues observed. Clean harvesting operation. Timber Sale Inspection Record Form 2460-002 observed for monitoring. Notes observed dated 7/26/21 for last entry. Notes were in email form and not added to inspection record-administrator had been on fire detail deployed to MN. Others inspected in his absence. 9) Raining Acorns- 116 acres: 8 cutting units divided by snowmobile trails, roads and marshland. Salvage of ash killed by

	EAB and oaks killed by oak wilt. Regeneration of early successional species-ash and Jack pine. Harvest all trees greater than 1 inch except those reserved with green paint. NHI and Frozen ground restrictions. Review found occurrences adjacent but not on stand. Purchased in Spring, no activity at time of audit. Leave trees retained were dominant and appeared healthy-white pines and white oaks. Red buffer on swamp areas.
Black River Falls - Auditor Tucker Watts	1) Butterfuss Oak & Hardwoods (1263) - 112 acres release oak overstory 22 acres. Thinning of 90 acres. Older oak thinned for interior nesting birds. No invasives. Oak wilt requirements followed. No wetlands or BMP. No aesthetics. Leave tree retention marked with X. Interior cutting line is red. Sale is well marked and understandable. South of road is passive management. Sale is open. 70% canopy for birds. Red-Shoulder Hawk nest identified in sale. Oak wilt period extended for nesting period. Debris scattered for stabilization of ground conditions. Public and Ho-Chunk comments sought prior to developing sale plan. Discussed timber sale security and ticket system. 2) Pesticide Treatment - 2-acre food plot for elk to reduce damage to agriculture fields. Area treated with Roundup but was not planted due to equipment problems. Chemical used for control of invasive Fox Tail. Goal is to mow and refresh in Fall with no chemical use. Chemical Plan in WisFIRS. Plan was to till and plant site with grass and clover. Elk were introduced in 2015-2016. Goal is to have population of 390 animals. Log landings are being planted to supplement feed areas and attempt to reduce agriculture damage. Elk are monitored by GPS tracking and cameras. Calves have VHF collar for monitoring. 3) Townline Oak (1239) - 95-acre sale. 44-acre harvest with natural regeneration. 51 acres thinning. Oak wilt consideration required. Prior to harvest pre-merchantable Maple trees were cut and stumps treated. Treatment of Maple funded by grant from RMEF. Slopes stabilized with debris and native vegetation. Seed trees marked and retained. Residuals protected during harvesting. Good Aspen regeneration. NHI met with oak restriction. No wetlands or BMP required. Retention marked. No aesthetics required. 4) Oak Oasis (1280) - 60-acre sale. Goal is regenerate of Oak and improve habitat for Eastern Massassuaga, a rare species and interior bird species. Focus is on Eastern Massassuaga habitat. Area is old moss drying beds. Area mowed to create habitat. The Oak will be regenerated through a seed tree harvest. Monitoring of Eastern Mississauga is conducted annually in Spring. No invasive species were found

	5) Blue Spotted Slug (1267) - 80-acre sale. 72 acre White Pine thinning. 8 acre White Pine regeneration. Sale has been sold, but no harvesting activity. Silviculture trial for White Pine regeneration under uneven-aged management. Goal is to stimulate growth while creating 15 canopy gaps for White Pine regeneration. 3 locations with canopy gaps. Each location has a gap of 1/10th, 1/2, and 1 acre. Regeneration survey conducted prior to and following harvest. Will share findings with landowners. No invasive species. Stumps must be treated with CELLU-TREAT. NHI shows endangered, threatened, and special species of concern in or within 1 mile of sale. No wetlands. No BMP required. Retention required. No aesthetics. 6) Battlepoint Oak & Pine (1277) - Logger training verified. 137 acres. 50 acres oak regeneration. 3.4 acre island untouched for wildlife and aesthetics. 74 acres White Pine thinning. Lower quality and less desirable trees removed. Good tree selection. Buckthorn light will be monitored. Pine stumps treated with CELLU-TREAT. Frozen or dry grounds required. Retention for wildlife. No archeological sites. ATV/snowmobile trail goes through sale area. Signs will be used during the use of trail. Observance of Karner Blue Butterfly conducted. None observed. Lupine habitat observed. None present. No issues observed. 7) Towering Pines (1224) - 88 acres. Harvest and 2 acre red pine thinning. Leave trees marked. Debris used for stabilization. Natural regeneration. Arial seeding of Jack Pine. Invasive Buckthorn has been treated. Cleaning of equipment required prior to moving into Red Pine and before leaving timber sale. Wetlands in and near sale. Dry or frozen conditions required for work in wet areas. Aesthetics along Highway K. Snags and den trees left. Archeologist concern cleared. 8) Red sale boundary along Dickey Creek well delineated. No issue identified. Steep area along Dickey Creek well protected. 9) Freezer Door Sale (1268) – 59-acre sale. 54 acres harvest with regeneration by planting Jack Pine. 5 acre Shelterwood to promote White Pine and Oak regeneration. Active sale. Retained trees marked. Snags retained. Biomass has been harvested in parts of sale. Invasive Buckthorn to be treated post-harvest. NHI identifies 4 butterflies, 4 communities, 1 bird, 1 moth, 2 plants. No water or aesthetics issues.
Eau Claire - Auditor Brendan Grady	#1 Dunnville Wildlife Area – Oak Savannah work, bottom land hardwood. Grassland restoration, prescribed burning. Heavy Recreation use on the WA (Wildlife Area), hunting, beach day use. Large remnant prairie in WA – State Natural Area Dunnville Prairie.

	Seven-Pointer Sale, 63 acres total, Multiple units, Aspen, Mixed Hardwoods sale, Access near County HWY Y. Sale is sold but not harvested yet. Aesthetics concerns, Harvest intended to remove mature aspen and low vigor/ high risk trees. 1st patch, target is move to all age hardwood stand through aspen removal. Target residual basal area is 85 across the stand. 2nd patch, Oak dominated stand. 3rd patch, move to multi-aged white pine stand. Several NHI hits for nesting songbirds, regional ecologist contacted. Stand is adjacent to Red Cedar River, all harvest units on a bluff. No impacts anticipated. Auditor reviewed red line operational buffer above the escarpment. Line was well in excess of BMP minimum due to the inoperable slope, and proposed thinning would leave basal area above 60 BA. #2 Dunnville - Bammert Bottoms Sale, 78 acres total, Single tree/group selection 53 acres. Regen 25 acres. Mixed Hardwood and Silver maple harvest. Frozen/dry ground only. Harvest goal to promote regen of bottomland hardwoods and promote healthy silver maple through thinning. Multiple NHI hits. Oxbow pond/wetland complex present in the unit, portion of unit adjacent to Chippewa river. Active sale, logger onsite performing equipment maintenance interview, verified first aid and spill kits. #3 Gilbert Creek Fishery Area – discussed trout habitat restoration project along creek. Sidehill Sale 32-acre thinning. Marked but not sold yet. Plan is to cut all marked and merchantable aspen & white birch. Primarily red oak sale by volume. Stand borders perennial stream (Gilbert Creek). Goal of plan is to harvest mature trees and create a mixed species all age stand. Harvest border more than 100 ft from stream edge. Red line marked around spring, 75-100 ft., residual BA planned to be 60 BA. #4 Willow River State Park - Heavily used state park. Recreation demand from twin cities area, primarily hiking and trail use, some hunting. Timber objective for the park is to maintain healthy stands. Pumpkinseed Timber Sale - Improvement thinning, 46-acre pine thinning, 4 scattered blocks, 50-60-year-old. Invasive brush concerns in all stands. Recreational trails may be impacted, buffering of trails. Stand is adjacent to campgrounds and recreational trails. Sale is prepared but not sold, has been advertised multiple times without success. May move to a direct sale rather than auction in order to facilitate a purchase of the

	timber. Distance from market and operational challenges from operating in the park make it a challenging sale. #5 Willow River pesticide application site. - Buckthorn control pesticide site, as part of harvest preparation for Pumpkinseed. First mechanical thinning followed by herbicide application. Discussed planning process and ESRAs for individual approvals. #6 Willow River Wildlife Area - 800-acre wildlife area, primarily prairie and grassland restoration. Discussed prairie restoration process using old farm fields and planting with native grass seeds. Maintain through burning. Prairies are underrepresented on the landscape due to large scale conversion to agriculture. Prairie Pines Timber sale 47-acre pine thinning, marked trees and all aspen cut. Harvest took place in 2019. Separate into two blocks, one primarily red pine, the second primarily white pine. Some white spruce, & mxd hardwoods. No residual stand damage in thinning, stand looked healthy and vigorous. Eventual plan is to convert these pine stands to prairie or oak savannah once the planted pine stands reach the end of their rotation (still several decades at least). #7 Cylon Wildlife Area - 2800-acre area, mix of uplands, marsh, meadows, wetland restoration. 4 flowages on the area. Popple Pandemic Timber Sale 61 acre, even aged harvest, goal is to regen aspen & oak using clearcut or variable retention. Stand was partially cut. Lots of logs and tops in the unit still waiting to be skidded, due to poor market for biomass last year. Merchantable material will be removed prior to the forester closing out the sale. Sale contained several sedge meadows, discussed BMP needs surrounding these. Decision was made that a buffer mark was not necessary since the wetlands can be harvested with seasonal restrictions, although no trees were marked in this particular one. Timber sale is restricted to frozen or dry ground only. State Natural Area adjacent to timber sale. Cylon SNA, intended to promote older stand types, since the rest of the wildlife area is dedicated to active management and early seral systems. Large white pines in the SNA. #8 Cylon Wildlife Area - Cylon Oaks sale 70 acre, Oak/aspen regeneration cut, Dry/frozen harvest only. Primarily even-aged coppice harvest, one unit of oak seed tree. One NHI hit of Blanding's turtle Similar to previous site, harvest was finished but not closed out since merchantable tops and a large chip pile still on site because of market fluctuations. They will be removed before the sale is closed.
Date: 9/15/2021	

FMU / location / sites visited	Activities / notes
Lacrosse Audit team - Auditor Shannon Wilks	All sites observed had completed Timber Sale and Cutting Notice documents (2460). NHI, wildlife management, recreation, resources of special concern (archaeological), aesthetic, water quality and ecological evidence. All timber sales contracts contained BMP requirements, use of FISTA trained loggers and compliance to all regulations. No public complaints on Forest management activity. All prescriptions, maps and ground conditions matched management plans. 1. Broadhead-(mandatory) 76 acres: 7 stands consisting of 3 harvest units. Tract is within General Habitat Management of Meadow Valley Wildlife Area. Regeneration harvest and white pine thinning, GTR of 2-3 oaks per acre where applicable. Expansion of barrens habitat to provide habitat. Consulted Wildlife Action Plan. No RTE species detected during NHI review. Habitat for KBB (Karner Blue Butterfly) will be enhanced by harvesting operations. Blue line for fire break improvement. Sale has been sold but no activity at time of audit. Barrens is global imperiled habitat. Logging slash will be piled and burned post-harvest. Goal to increase plants and herbaceous habitat. Ideal is prescribed burning every 4-6 years. Limited disturbance of Lupine habitat due to federal guidelines. HCP plan to increase habitat for KBB. Prescribed burning-plan established, develop with WISFIRS- identification of aspects, goals and objectives. Maintain early successional condition. Assigned to burn boss- implementation of plan, sent for approval, ranking established for assignment, implementation with site specific with all notifications internally and external. Post burn monitoring- report from burn boss; following summer Habitat Manager assesses goals and achievements. Next management activity including fire, mowing and herbicide treatments as needed. No water features within Barrens area. Ditch is located on one of stands- red lined for protection. 2. County H-101 acres: 7 stands consisting of 4 harvest units. Objective is regeneration of oak. One red pine stand being regenerated. All trees not marked in green paint and 1 inch and greater trees will be harvested. GTR of 1 oak per acre will be retained for wildlife and seed. Stand has been sold but no activity at time of audit. Historical removal of Jack pine and thinning of oaks. Now patches of oak are intermixed with Jack pine. Oak wilt restrictions for harvesting- April 1-July 15. No water features on stands. Low area borders but stand does not enter, red line painted as boundary. Observed green marked islands of white oaks. Knowledgeable of stand and management plans confirmed. Evidence of oak wilt observed in black oaks. 3. Blueberry Trail-91 acres: Tract is within General Habitat Management of Meadow Valley Wildlife Area. Mature oak stand will be regenerated to early successional habitat. All trees not marked in green paint and 1 inch and greater trees will be

	harvested. Consulted Wildlife Action Plan. Several species were identified during NHI review. No suitable habitat was located. KBB survey conducted and no suitable habitat was located. Oak wilt restrictions on harvesting from April 1-July 15. GTR of wildlife trees and 2-3 oaks per acre. Snowmobile trail on site and can be used for hauling. Sale has been completed in winter 2021; post-sale inspection performed. Harvested by Lambert FP- Qualified Logging Professional certified. Observed green marked trees, oak wilt impacted snags left. No erosion or soil movement issues identified on access roads. Township issues on county road during operations, alternate route through snowmobile trail utilized. Signs placed for notice and operations were shut down early on Friday and weekends for snowmobile recreation. Monitoring record of harvesting operations observed. No issues identified. No water features of stand. Post monitoring activity- considering shearing of white pine unmerchantable stems to enhance oak regeneration. Observation on ground confirmed tremendous oak regeneration. Landings will be increased and seeding of native grasses and forbes. Access trail is mowed, land has significant hunting pressure. Observed slash utilized on hills for skid trails. Good utilization of fiber and no evidence of hydrocarbon or trash. Good harvesting operation. Stand conditions matched prescription and management plans. Stand boundaries identified with red painted lines. Recreational hunting and snowmobile trails through stand. Fire plow lines observed for containment. Observed red pine thinning, removal of inferior stems. Protection of residual stand- minimal damage observed. 4. Carsonite-83 acres: 8 stands and 2 cutting units. Primary objective is regeneration to early successional habitat. Overstory removal of white pine, Black oak and Red maple. Retain 1-2 Oaks and white pines per acre marked with green paint and scattered mature red pines. First thinning (every third row) will be conducted on red pine plantation stand. NHI review confirmed presence of 4 communities, 2 insects, 1 insect range, 1 native plant, 1 endangered reptile and 1 endangered bird. All requirements or impacts mitigated. Treatment of red pine stumps required in thinning area due to Annosum Root Rot-April 1-November 30. Pine harvested between May 15-August 15 must be hauled within 2 weeks to prevent bark beetles. Signage needed during winter harvesting for snowmobile trail. Sale is active but no harvesting or equipment on site during audit. Qualified Logging Professional certified. HRD treatment on red pine stumps- signs posting on access road for pesticide notification. Monitoring/sale inspection report observed for tract- date of last entry 7/9/21. Wildfire impacted east finger on sale in April. Started from railroad traffic off-site and migrating onto stand. Blue lines observed on exterior boundary with a Necedah Wildlife Refuge. Town requested clearing of right-of-way. Significant regeneration of black oaks

	observed in burned area. Personnel will allow succession to occur and stand convert to early habitat. Buffer of small red maple island left in low area. Stand is harvested during dry ground or frozen ground restrictions. No rutting observed. Good utilization of fiber, no evidence of trash or hydrocarbon spills. Clean operation. Stand is 85-90% complete. 5. Buckhorn State Park- 8k acres: 120 campsites. ~57 primitive campsites. Handicapped accessible cabin (only 1-8 in state. Attendance in 2020 was 195,000. Regional location for families. Park located on Castlerock Lake. Handicap observation tower on walking trail. Kiosks on walking trail to educate and inform public. Eco-box located on walking trail hand-crank that gives educational recording about history of barrens and unique features. Handicapped accessible kayaks, beach chairs, sit-skis and hunting stand/blind. 6. Buckhorn State Park-Rusted Arrow-213 acres: 1 cutting unit-whole tree harvesting of Jack Pine and oaks. Stand straddles border of Buckhorn Oak Barrens Management Area and Buckhorn Recreation Management Area. Creation of oak barrens and grassland. Reserved and marked with green paint- oaks and Jack pine. Stand is active and still open. No equipment or activity on site during audit. Fuel chipping of debris remaining, along with pile of fuel. Qualified Logging Professional certified. Stand will be burned every 4-6 years to maintain oak barrens and grassland. GTR of oaks observed. Walking trail within stand and adjacent to south boundary- observed with signs. No public complaints confirmed by Park Manager. Public notices posted at park and website for activity. Natural Area within Buckhorn. No water aspects on stand. Oak wilt was present and declining health of remaining oaks facilitated transition to oak barrens. Site was allowed to utilize whole tree chipping within WI Biomass Harvesting Guidelines due to transitioning to barrens. No evidence of trash or hydrocarbon spills. 7. Buckhorn State Park-East Sandbox Openings Herbicide: application sprayed in August 2020. 4 spots treated with combination of Escort XP (.5 ounces /acre) and Garlon 4 (1 qt/acre). DNR Applicator #67630 with valid expiration. All mixtures are based on formulated mixture developed by DNR Forest Health. Conducted in July August 2021-Targets spot treatments of oaks, cherry's and maples to create mosaic within oak barren. Signs posted on public entrance to alert and prohibit entry. Site burned in April 2021 by DNR personnel- burn outline provided in site #1. Sand-blow adjacent to herbicide area. Glacial remnants of ancient ocean bed. 8. Buckhorn State Park-Orphan Pine-189 acres: 8 cutting units. Thin plantations and promote growth and health. Harvest cut of 4 acres for removal of black locust to promote other desirable species- Not Completed due management change on

	property. Saplings have grown and next phase will need to be planned for ground fecon (mulch). 2 reptiles and 1 insect listed during NHI review. Survey planned for insect and suitable habitat not present for reptiles. Red pine stand was thinned for 3rd time. Marked orange removal of inferior trees. Tract completed in Spring 2021 Qualified Logging Professional certified. Excellent quality harvesting in thinning areas. Minimal evidence of damage to residual stand. No evidence of hydrocarbon spills. Random BA plots confirmed ~110 BA. Next management activity on red pine will be 10-15 years for 4th thinning. Rotation age around 70-90. Parcel was restricted to harvesting in deer hunting season. Black locust was harvested for posts. Clean harvest operation with no trash observed. 9. Buckhorn State Park-The Flush Sale-74 acres: regeneration of oak and Jack pine; expansion of desirable species in pine stands. Oak wilt present. Cut all trees not marked in green paint. Pine plantation area- cut all orange painted trees. Private landowners adjoining sale were notified by Cutting-Line Agreement. Three attempts are made for contact and operations proceed. Landowners receive a copy of completed agreement. Federal butterfly and range noted during NHI review. Survey completed for habitat assessment; note of consideration for location of decks. HRD prevention required April 1-November 30. No activity at time of site visit. Stand has been sold. Logger qualifications and other verification will be conducted prior to start of harvesting. Ground conditions matched management plans and prescription. Observation of oak wilt impacts. Marked green trees observed-some Jack pine. Some pockets of oak are dead, and nothing retained. Adequate regeneration of black oaks. Prescription matched ground conditions.
Black River Falls – Auditor Tucker Watts	1) Black River Falls Shop - Chemical Storage Review - Chemical storage locker is locked. There are 2 keys to locker. One key is on site and Ralph has key. Tray is on each shelf for containment of any spill or leakage from containers. Each jug has a label with the mix stated. There is a sheet in the locker with the mix for each chemical. The label and SDS was present for each chemical in the locker. 2) Powerhouse Pine & Oak - Complaint/Comment was raised on the harvesting of timber on the Powerhouse Pine & Oak Timber Sale. Normal process had been used for the development of the timber sale. Prescription is for a regeneration cut of 24 acres of orange marked trees of Red and White Pine, and hardwood, except White Oak greater than 12"; 52 acres of 2nd thinning. Natural regeneration will be used. BA in regeneration area averages 20 BA, with a greater density along the North end near

	neighboring property. Invasive species will require stump treatment with CELLU-TREAT and Oak Wilt harvesting restrictions. Aesthetic requirements require slash to be 100' from roadways. There is a 100' buffer painted in red along the Black River. This area is very steep and not operable. NHI archeological findings restrict harvesting to frozen ground. Lupine survey has been conducted with no presence. Boundary Cutting Line Agreement for Timber Harvesting was received for the South line with Croell Redi-Mix Quarry. Landowner on the North did not agree with the established line. Sale has been delayed indefinitely. 3) Tank Creek Fishery Area - Scattered Pine (2712) - 47 acres. Thinning of Red Pine. Goal is to improve growth, spacing, and stand vigor. Will convert stand to Oak as possible. No invasives. Archeological hits require restriction for parts of sale to be harvested during frozen ground. Stream crossing permit has been obtained. NHI hit for Wood Turtle. Habitat is not present on site. 50 ft. buffer for stream. Prescription is for creation of landscape diversity for Grouse. CTL used for harvesting. Residuals protected during harvesting. Minimal skinning observed. Good tree selection. Crossing used in 2019. Banks stabilized with native vegetation. Clean flow. No issues identified. 4) South Beaver Creek Wildlife Area - South Beaver Hardwoods (2709) - 39 acre thinning and regeneration of Oak and Aspen. Green tree retention. Goal is for establishment of young forest habitat. Debris scattered for stabilization. Very steep ground. Invasive species BMPS will be followed by spraying off equipment prior to moving on site. FISTA verified for purchase. Verification of FISTA today confirms FISTA is not current. FISTA must be current prior to beginning harvest. Logger will be contacted. 5) Lake Coulee Wildlife Area - Bird Dog - 7 & 6 acre thinning. 11- & 38-acre regeneration harvest. Active sale. Conversion of Red Pine to Hardwood. Planting of Red Oak, White Oak, and Bur Oak. Goal is to improve species composition and wildlife habitat. Seedlings protected from browsing and rubbing with tubes. Tubes will be in place for 5 years. Seeding of logging roads required. Retention required Debris scattered. Invasives observed on tract. Invasive BMPs were followed. Machinery is cleaned prior to entry and before leaving tract. Confirmed during interview. Garlic Mustard has been mapped and area flagged. Area will be cut last. Equipment cleaning is mandatory. Operation to take place with dry or frozen ground. NHI is aquatic. Another NHI does not have habitat. No archeological sites identified. No water on site.

	6) Supplemental planting for Oak regeneration. Chemical treatment around tubes to control competition. Nets on tubes for birds and amphibians. Treatment prescription in WisFIRS. Monitoring for survival, and rodents. Good survival. 7) Trempealeau Lakes Fisheries Area – Felix Flats - 14.14-acre Invasive Control of Buckthorn and Honeysuckle. Escort XP and Alligare Triclopyr 4 used for control. Hand pulling/Weed wrench and fire evaluated as non-chemical alternative. Alternatives will not be effective. Pine stand will be allowed to evolve to bottomland hardwood. Stand was mowed during the Winter 2020-2021. Ground broadcast spray was conducted during August 2021. Label and SDS witnessed in WisFIRS. Witnessed Invasive Special Control - Mechanical & Chemical Treatment Contract. All required elements included. Observed goal met to control invasives. Group openings created. No issues observed. 8) 15.47-acre Invasive control of Buckthorn and Honeysuckle using Milestone and Element 4. Hand pulling/Weed wrench and fire evaluated as non-chemical alternative. Alternatives will not be effectiveWitnessed 2021 Felix Flats 40 - Site Prep Chemical Treatment Contract. Observed effective application. No issues identified.
Eau Claire - Auditor Brendan Grady	1) Hoffman Hills Recreational Area: recreational management area, made up of donated property. Historic farmland that is in the long term process of converting to oak savannah and mixed hardwood type. The site has heavy recreational use, particularly cross country skiing. The hilly terrain provides a challenging area for advanced skiers. Hoffman Pine Sale – 47-acre Pine thinning in multiple stands. White pine thinning reducing basal area from 150 to 120 sq ft. Red pine thinning reducing from 130-100 BA. Intermediate thinning, long term plan is to convert planted pine to a mixed species stand. Inspected landing, soil condition throughout sale was still in good shape. Seasonal restrictions on the harvest in place so that it wouldn't interfere with heavy recreational use. Sale completed in 2021. 2) Hoffman pesticide treatment area Cellu-treat needed to control Heterobasidion root disease (HRD). HRD was not present in the stand, but within the radius of where treatment is needed on conifer stumps. Discussed pesticide approval and prescription process. Application went through DNR's "individual" approval process rather than a "general" application. 3) Otter Creek Fishery Area Property focused around class 2 trout stream, purchased for primarily for angling opportunities, although the property is relatively remote and underutilized for recreation.

	Bridge Over Troubled Water timber sale – 4-acre sale in two patches. Pine stands planted in 1960s, largely unmanaged until 2009 thinning. Stand suffered from poor health and a salvage cut was established to rotate the stand. Cut in 2021 winter during frozen conditions. Reviewed RMZ along trout stream. Red line was set in excess of 100 ft. No harvesting past red line in the RMZ. Streamside buffer well protected from erosion with an alder thicket. Sale bordered an inholding, discussed coordination with neighboring property owner. 4) BOTW tree planting White pine and tamarack supplemental planting in the previous site. Stand will rely primarily on natural regeneration to convert back to an oak woodland. Planting done as part of community effort with a local school. Discussed monitoring strategy for these types of plantings. 5) Hay Creek Deer Exclusion fence Deer exclusion project set up small fenced area in order to exclude deer browse. White pine stand that had been recently thinned. Plan for the fenced area to be in effect for 3-4 years as a demonstration of browse effect. Discussion about rising deer herd population in the county and how it has made tree regeneration a challenge. Exclusion fence will be used to educate the public about this. Fenced area had notably more vigorous young regeneration. 6) Hay creek Buckthorn control pesticide site. Herbicide application after 2018 white pine thinning (same as previous site). Treatment during winter 2020, used Garlon 4. Reviewed pesticide application and approval process. Site showed good buckthorn control, should allow for seedlings to outcompete it. 7) Elk Creek Fishery area – Albertville suburbs timber sale. Three separate units, red pine thinning, aspen regeneration cut, aspen/red maple/oak regen. Sale bordered class 1 trout stream. Reviewed RMZ, red paint line was well in excess of 150 ft from the stream. No harvest in the RMZ. Stream banks in good condition with low erosion risk. 8) Elk Creek Tornado salvage sale – 2019 tornado caused blowdown in the Elk Creek area. Harvest focused on cleaning up blow down. Sale area bordered the creek, reviewed RMZ. Buckthorn herbicide treatment, intermittent planting with red oak and basswood.
Date: 9/16/2021	
FMU / location / sites visited	**Activities / notes**
Lacrosse Audit team - Auditor Shannon Wilks	All sites observed had completed Timber Sale and Cutting Notice documents (2460). NHI, wildlife management, recreation, resources of special concern (archaeological), aesthetic, water quality and ecological evidence. All timber sales contracts contained BMP requirements, use of FISTA trained loggers and compliance to all regulations. No public complaints on Forest

	management activity. State Natural Area- NHI Program-Ecologist Overall management- of NHI. Updates to program and input into GIS. Research permits on state lands are issued and managed within state lands by department- SNA, Parks, etc. Conservation research is funded by grants primarily for monitoring activities. Landscape level research grants, White Oak acorns for University of Kentucky project on White Oaks. Mandatory training requirements and role specific trading. Great Lakes Forest Fire Compact-MI, MN, WI, Manitoba, Ontario. Regional coordination to manage forest fires. Coordinating training within compact for preparation of wildfire events. Research Project-Fisheries Biologist- Brown Trout removal on Brook Trout streams for population and habitat. Collaboration with UW-Lacrosse. 1. Bluffside Black Oak-58 acres: Mill Bluff State Park is a mixed-use park that includes camping and hiking opportunities and is known for its rocky bluffs and its history as a roadside park. This timber sale is a regeneration harvest for the benefit of oak and jack pine on the property while leaving some trees for aesthetic reasons as well as a seed-source. These harvests are seed tree and shelterwood regeneration systems and will retain between 20 and 40 basal area of mature oak, jack pine, white pine, and red pine for seed, aesthetics, and structure. Oak wilt pockets are noted within stands 50 and 67. Because of the harvest restriction dates, the oak wilt restricted period will be followed. All pine products cut between March 1 and August 30 must be removed from the sale area within three weeks from time of cutting to control bark beetle populations. The Natural Heritage Inventory revealed multiple hits within the buffer of this harvest. See NHI check for further details. NHI check was done on 11/6/19. There were multiple Archeological hits near, but not within, the harvest area. See archeological information in the timber sale file. Review was done on 11/7/19. Sold but no activity at time of audit. Visual buffer of trees left along walking trails. Buffer delineated with red paint. GTR of green marked trees. Recreational hunting, walking trails and handicapped accessible trails, rustic camping and swimming beach. 2. Soper Creek Seed Tree-70 acres (mandatory): The Big Creek Fishery Area is a state fisheries-owned property. Soper creek is the headwaters for Big Creek. The property has been historically managed for both pine and hardwood production. This timber sale has two objectives. First, to harvest mature timber that has reached its rotation age, while allowing excellent advance regeneration to grow. Next, areas of red pine will be left to continue growing until rotation age. For compartment 204 stand 5, the majority of the stand is mature jack pine, with scattered pockets of red pine, as well as scattered black oak and white pine.

	A seed tree harvest will leave scattered jack pine as a seed source. Red pine pockets will be left as green tree islands as they have not fully matured. Green tree retention includes 3-5 jack pine trees per acre, as well as islands of red pine left to mature. NHI review includes possibility of several special concern and endangered species present. Please consult NHI review for further information. Review completed on 2/16/2021. No archeological hits presently known. Archeological review done on 2/16/2021. Red line and buffer of red maple stand along headwaters. Blue line boundary for exterior. No harvesting or equipment. Confirmed interview with FISTA is used to confirm training of harvest contractors. Brook and Brown trout habitat, recreational opportunities and hunting opportunities. Stream survey in 2018- Class 1 or 2. Sale active, 2/3 complete but no harvesting or equipment present during field site. Observed red line buffer with no evidence of equipment incursion. Mat of logging debris utilized on skid trail. No BMP issues or water aspects on stand. Monitoring report observed and last activity date was 8/24/21. Clean operation, good utilization and vigorous tree retention observed. Great job of protecting regeneration during harvest operation. Next planned activity is regeneration survey in 3 years, Buckthorn herbicide as soon possible and approved from regeneration fund-likely in 2022. Post-sale recon completed on all FM activities. Schedules are updated in WISFIRS. 3. Barrel Brook-41 acres: The Big Creek Fishery Area is a state fisheries-owned property and this area also includes a ruffed grouse management recreation area. Compartment 202 stand 10 and 34 will be overstory removal harvests as they contain good advance regeneration. Compartment 202 stand 13 and 17 will be thinnings to improve overall stand health, vigor, and spacing. An intermediate thinning will be done in compartment 202 stand 13 and 17. Overstory removal will be used in compartment 202 stand 10 and 34 to remove mature trees while promoting advance regeneration that is present. The intermediate thinning areas will retain significant basal area after harvest. The overstory removal areas will still retain up to 30 basal area in some areas as legacy trees and a seed source. The Natural Heritage Inventory revealed multiple hits within the buffer of this harvest. See NHI check for further details. NHI check was done on 2/10/2020. There appear to be no hits in the Archeological review. Review was done on 2/10/2020. Harvesting completed in June 2021. Harvested Qualified Logging Professional certified. Red line buffer along Big Creek. Invasive vine weed observed. Mitigation measure discussed with Forester by shading. No evidence of trespass within red buffer line. No trash or hydrocarbon spills observed. Blue line on exterior boundary. Clean harvest, good utilization of fiber. Ground conditions on all stands matched prescription. Property is being managed to include early successional habitat for Ruffed Grouse.

	4. Coulee Experimental Forest-1950-1970 studies with water runoff, plantings of Russian Olive, Autumn Olive for wildlife. Site-RC West Conversion-27 acres (mandatory): The red pine plantation in this sale has been invaded by autumn olive, Japanese barberry, and buckthorn. The sale objective is to remove the pine in preparation for controlling the invasives and seeding the site to oak. The aspen areas are small pockets of mature aspen that are adjacent to the pine and are logical to harvest at the same time. The prescription is to harvest all stems within the sale area that contain at least one pulp stick. Stands 28, 29 and 70 had been the green tree retention for the earlier thinning for this stand and will be again for this harvest. Total green tree retention is 20 acres. The review indicated 4 threatened bird species within the buffered area. The harvest area does not contain suitable habitat for any of them. The cultural review was completed on 12/26/18 and there were no hits. Red pine thinned in 2015-opening of stand proliferated growth of invasive species. Site will be transition back to native hardwood forest. Interview with adjoining landowner confirmed no complaints regarding FM activity. Historical development of assistance on site for cross country skiing. Issue with adjacent landowner claiming easement on access to property. DNR working to resolve at state level. Sale was planned to be active, but issue with landowner prevented start. No activity at time of audit. Old storage building on site. All pine and stems greater than 1 inch will be removed. Pine specs have 4-inch top. Lump sum sale. Riparian zone and central hardwood areas retained. Post-harvest recon mowing will occur. Regeneration funds utilized for herbicide treatment and replant oaks- multi- year sale. Bell Timber purchased tract. Heavy undergrowth of herbaceous and invasives observed in pine stand. Stand and sale boundary well defined. No water features on stand, old Coulee washes will be protected but do not hold water. Stream banks protected with no equipment allowed within buffer. 5. Coulee Experimental Forest-Cut Stump Invasives Control Herbicide-22 acres with ~3 acres completed(mandatory)-Working across Divisional boundaries- Forestry regeneration funds supported Conservation Divisions for invasive treatment. Treatment completed in 2020. Autumn olives, Buckthorns and other exotics. Garlon 4 & Bark Oil utilized-mix ratio of 20%. (12.5-gallon bullet container-2.5 Gallon). Label use- max rate 8 qts/acre. Used approximately 100 ounces. Use of 3.2 quarts or 1.06 quarts per acre. 13% of maximum label recommendation. Significantly below max label use. Hand spot treatment- licensed applicators. Signs were posted at access points prohibiting entry. No evidence of drift or unintended targets during site visit- only stumps of Russian Olive and Honeysuckle were observed. 5. Coulee Experimental Forest-Crown Vetch/Knapweed/Sumac Control-Berg Prairie Herbicide-5

	acres(mandatory)- Funding from Pittman Robinson. Mixture of 1/2 ounce per gallon with water mixture. 10 ounces of Milestone. Max label use-14 oz/acre/year. Usage of 2 ounces per acre or 85% below max label use. Prescribed burn for maintenance of seed collection of prairie drop seed. Site is burned every other year. Qualified DNR personnel managed burn operations. Confirmed proper use of PPE during interview with DNR personnel and observation of photo during application- use of safety glasses, long sleeve shirts, pants, gloves and boots. 6. Coulee Experimental Forest-Crown Vetch/Knapweed/Sumac Control-Berg Prairie Herbicide-5 acres(mandatory)- Funding from Pittman Robinson. Mixture of 1/2 ounce per gallon with water mixture. 10 ounces of Milestone. Max label use-14 oz/acre/year. Usage of 2 ounces per acre or 85% below max label use. Prescribed burn for maintenance of seed collection of prairie drop seed. Site is burned every other year. Qualified DNR personnel managed burn operations. Confirmed proper use of PPE during interview with DNR personnel and observation of photo during application- use of safety glasses, long sleeve shirts, pants, gloves and boots. 7. Coulee Experimental State Forest-Japanese Stiltgrass grass-Post Emergent Herbicide-(mandatory). Stiltgrass discovered on roadside leading to parking area. Outside Botanist from MN located first ever discovery in WI~ (July 2020). Currently applying Maddog K6-August 2021 treatments. Reporting quantity will be finalized once complete. Applications conducted in 2020-4 ounces per gallon. Total usage 4 ounces-application of 1/10 acre. Max label use 5.3 quarts per acre per year. Based on application only 24% of maximum label applied. Boot brush observed on walking trail for visitor use- aid in spread of invade species. Ground conditions confirmed prescription.
Black River Falls – Auditor Tucker Watts	1) Merrick State Park - Siberian Elm Control (invasive) - 1.65 acres. Razor Pro used in Red Pine for control of Buckthorn, Siberian Elm, Honeysuckle, and Prickly Ash. Spot application used. 2 cuts and spray of tree. Application done by employees and interns. Training includes saw training and applicators license. Woody debris and snags retained for wildlife. On-going project. Application conducted in bands annually. 2) Tiffany Wildlife Area - Swamp White Oak Plantation - 4 acres. Afforestation of hay field with Swamp White Oak. Witnessed pruning of 15-year-old Swamp White Oak plantation. Plantation established at a high density for Integrated Pest Management control of Reed Canary Grass. Swamp White Oak is limited species in ecosystem. Interplanting has been conducted with tubes. Openings have Reed Canary Grass and nettle. Regeneration is inhibited. Trial is successful for regeneration of

	Swamp White Oak and Integrated Pest Management of Reed Canary Grass. 3) Tiffany Wildlife Area - Swamp White Oak Planting - Test of planting of Swamp White Oak on 5-acre old agriculture field invaded with Reed Canary Grass. High density planting (4X4) to control Reed Canary Grass for restoration of Swamp White Oak which is in decline and test control measures for Reed Canary Grass. a. Steps of project include the following: • Site was mowed in the fall, 2007 • Site prep was conducted in the summer of 2008; the back portion of field was not addressed due to wetness. • There was no flooding on the site in the fall or the following spring (2009). This was good as no new seed was brought into the site. • The swamp white oak was planted on the site on April 16, 2009. We used a high-density method, planting the trees on a 4 foot by 4 foot spacing (2,723 trees/acre). We planted 1-year old stock from the State nursery. • Release work was done in May 2009, including in the back portion of the field. • Late August 2009, the field was checked. Some small pockets of reed canary grass were coming in, but not much, it was stunted and showing no sign of seed production. Some broadleaf weeds were coming in and a lot of thistles came in • On November 20, 2009, the field was checked, and the trees were being decimated by voles. There was a huge population of them on site and they were stripping the bark off numerous trees. • In April 2010, we hand planted 100 walnut, 200 swamp white, 200 tamarack, 100 river birch and 100 red osier dogwoods to fill in some openings. • Additional release work was done in June 2010. • May 2011, did more spot planting (400 trees) and reed canary grass control • May 2012, spot planted 100 swamp white oak. • 2013: wet spring, flood water stayed on until early June. No spraying done. Planted 100 sycamore and 100 swamp white oak to fill in openings. Canary grass not doing too bad. Lot of sedge. • 2014: another wet spring. Water came off field at end of May. No spraying done. 75 swamp white oak and 6 Kentucky coffee trees planted. Reeds not doing bad but, starting to get more prevalent. • January 30th, 2020: lateral and corrective pruning of plantation commences, ~1/4 of plantation addressed

	• January 29th, 2021: lateral and corrective pruning of plantation continues, an additional ~1/3 of plantation addressed, some competing/multi-stemmed river birch removed to release neighboring swamp white oak 4) Tiffany Wildlife Area - Swede Ramble Pines - 39 acres. 26 acres thinning for improved health of stand. 13-acre clearcut. Purchased by FISTA trained logger. Verified training record. Higher density in areas to protect from blow down. 5) Hardwood retained for wildlife. Goal of thinning is to encourage hardwood, Oak, Walnut. Invasive Honeysuckle monitored for future treatment. Retention observed. NHI hits examined and not effected on site. No archeology 6) Oak Planting - Planting of 800 Red Oak per acre in clearcut. Black Locust girdled. Area will seed in with Aspen and Oak. No issues identified. 7) Tiffany Wildlife Area - Round Hill - 17.91 acres. Site is remnant sand prairie. Invasive control of Siberian Elm, Honeysuckle, Black Locust, Sumac using Milestone and Alligare Triclopyr 4. Fire has been used every 2-3 years. Integrated Pest Management used with Sumac by mowing. Goal is to return to prairie. Great diversity of plants and animals. 8) Tiffany Wildlife Area - Maxwell Pine - 37 acres 14 acres Pine Thinning. 14 acres Clearcut. Goal to improve stand health. Remove lower quality and/or less desirable trees. NHI hits, but habitat does not exist on site. No BMPs required. Retention of snags and live trees. Voles along ROW have been removed. Roads used by public have been graded and seeded. Harvesting by CTL. Debris spread. Slash used to armor skid trails. Minimal damage to residual stand. No Oak cut in clearcut. Orange marked trees to be cut. Discussed security and ticket box. Sale was recently closed. No issues identified. 9) Tree Release (Herbicide) -7.23 acres. Razor Pro. Target Oak Wilt. Employee double girdle and spray for Oak Wilt. Trees damaged and susceptible to Oak Wilt have been cut and stumps treated. Continue to monitor for Oak Wilt next Summer.
Eau Claire - Auditor Brendan Grady	Site #1: Augusta wildlife area, Wildlife road north timber sale. Augusta is a large wildlife area close to Eau Claire, sees significant amount of hunting use. Primarily waterfowl, deer & grouse hunting. Three impoundments on the area. Jack Pine & aspen regeneration cut, mixed species thinning. Harvest on frozen or dry ground only. Wet swale was excluded from the harvest. Harvested with forwarder/processer. NHI hits in

	the sale were primarily for aquatic species, mitigating by seasonal harvesting restrictions. Harvest was conducted during dry conditions in the summer. Reviewed small amount of rutting on a skid trail that did not rise to level of excessive rutting under DNR guidelines. Overall harvesting at the site was well done with little residual damage. Site #2: Kelly Road take 2 THP 26-acre, planned but not cut regeneration harvest. Goal was to stimulate oak regen. Property line had been recently surveyed due to neighboring land sale. Reviewed paint lines and reserve trees. Second block is a pine thinning patch, 160 sq ft basal area pre-harvest, goal of 125 post-harvest. Discussed stand origins and overall management objectives for the site. Site #3 Remnant prairie, state natural area on Augusta wildlife area. Native prairie that is maintained through burning and mowing. Planned timber sale in neighboring aspen stand in order to expand the site and connect it with other prairies, but this was unsuccessful due to market conditions. Site #4 McCann Creek Fishery Area – Fishery area built around Class 1 trout stream, primarily brook trout habitat. Discuss trout habitat projects. 80% of the creek is either held by DNR outright or in easements. Reviewed tree planting area. Former sharecrop field former agricultural lease. Decision made to replant as forest after the lease expired. Planted red pine seedlings in 2018. Goal is for pine forest to provide young forest habitat diversity, especially for deer. Site #5 – Pesticide application on McCann Creek site #4. Trans line spaying on pre-emergements. Needed to control thistle outbreak that occurred, classified as a noxious weed. Site was bordered by active agricultural fields. Seedlings showed strong survival rate. Site #6 – Obey Visitor Center, Chippewa Moraine Recreational Area. Viewed visitor center, role of DNR in education and public outreach. The moraine is a unique geologic feature in the area. Discussed potential harvest on recreational area in the future. Site #7 – Duncan Creek Fishery Area – planned harvest, originally scheduled for 2027, but moved up because of concerns over emerald ash borer and Dutch elm disease will affect the stand. Prescription is to harvest all hardwoods above 2 inches and marked conifers. Stand contains small pocket of exotic scotch pine, which is targeted for removal. Scotch pine area includes harvest of half acre area within 66 ft of trout stream, which normally would be in excess of the BMP guideline. Discussed the approval process for this type of exception based on the need to remove an exotic species. A second similar sized stand of aspen and ash in the RMZ was marked for removal based on the RMZ aspen guidelines and EAB concerns.

	Site #8 Sand Creek Fishery Area – headwaters of Sand creek, empties into the red cedar river. Excellent brown trout habitat stream. Culvert replacement project along roadside ditch, which ran under the gravel driveway onto the property. Driveway had repeatedly failed before the new culvert. Replaced in June '21 with flat wall plastic culvert. No issues noted. Site #9 - Nobbern timber sale, 9-acre regeneration cut, 20-acre selection harvest. Removed all aspen and marked trees. Oak maintained on the site for structural diversity and mast production. Harvest restricted to dry or frozen, this one done during dry summer conditions in '21. No oak wilt restrictions. Some marked trees intended for cutting had been left on the site but had been replaced with neighboring trees. Overall utilization was acceptable. Site #10 – Nobbern sale planting. Same prescription as McCann creek planting described in sites 4&5. Old sharecropping lease that had expired and the field was planted to red pine. Pre-emergent herbicide application used. Seedlings showed strong survival rate.
Date: 9/17/2021	
FMU / location / sites visited	**Activities / notes**
Remote via videoconference	Closing Meeting Preparation: Auditor(s) consolidate notes, deliberate, and confirm evaluation findings.
	Closing Meeting: Review preliminary findings (potential non-conformities and observations) and discuss next steps.

2.2 Evaluation of Management Systems

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 reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member 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, interviews, stakeholder comments, and reviewed documents and records. Where consensus among 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. Changes in Management Practices

☒ There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies.

☐ Significant changes occurred since the last evaluation that may affect the FME's conformance to FSC standards and policies (*describe*):

4. Results of Evaluation

4.1 Definitions 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 evaluation 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 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation (2018)	1st Annual Evaluation (2019)	2nd Annual Evaluation (2020)	Special Audit (2021)	3rd Annual Evaluation (2021)	4th Annual Evaluation (2022)
No findings	☐	☐	☐	☐	☒	☐
P1				Minor 1.1.a		
P2						
P3	Obs 3.3.a					
P4	Obs 4.4.b			Minor 4.4.d		
P5						
P6	Obs 6.3.e, Obs 6.6.e, Obs 6.7.c			Minor 6.5.b	Minor 6.6.d	
P7		Obs 7.1.q		Minor 7.1.r	Obs 7.3.a	
P8	Obs 8.1.a	Obs 8.5.a				
P9						
P10						

COC for FM						
Trademark						
Group						
Other						

4.3 Existing Corrective Action Requests and Observations

No corrective action requests or observations were issued as a result of the 2020 Surveillance audit. A special audit was conducted in June 2021. Findings still open from that audit report are recorded here as well.

	Finding Number: 2021.1
Finding and Deadline	
☐ **Major CAR**: Pre-condition to certification/recertification ☐ **Major CAR**: 3 months from Issuance of Final Report ☐ **Minor CAR**: 12 months or next regularly scheduled audit, whichever comes first (*surveillance or re-evaluation*) ☐ **Observation** – response is optional ☒ **Other** and deadline (specify): Minor CAR, 12 months from finalization of the audit report (July 13, 2022)	
FMU CAR/OBS issued to (when more than one FMU):	
Standard and Indicator	FSC-US Forest Management Standard, Indicator 6.5.b
☒ **Non-Conformity Evidence** ☐ **Observation Justification and/or Explanation** **Issued 4/22/21, Following Complaint Investigation Report.** Subsquent to the 2020 field audit, a complaint was submitted to SCS regarding the Hodge Podge 11-19 timber sale, adjacent to Whitney Lake. On the basis of information provided by the complainants as well as interviews with pertinent DNR staff, review of pertinent elements of the Wisconsin Best Management Practices for Water Quality Manual and the Northern Highlands/American Legion Master Plan, it was determined that DNR's planned (and partially executed) timber harvest plan/sale ("Hodge Podge" 11-19 adjacent to Whitney Lake), is found to be in conflict with FSC-US Forest Management Standard. The planned harvest in tract 11-19 is primarily intended as an "overstory removal" type of commercial harvest that, in large part, is designed to provide sufficient light to the forest floor to foster establishment and development of a new cohort of seedlings/saplings, primarily oak. Overstory removal harvest prescriptions are generally more intensive (in terms of volume removed per acre) than single tree selection prescriptions. Likewise, so are the visual impacts. Another pertinent aspect of the planned harvest is that the intensity of planned removal of harvest trees (and, conversely, the spatial pattern of leave trees) varies across the harvest unit. The basal area retention of retained trees will be as low 35 square feet per acre in some areas and above 60 square feet per acre in other areas of the harvest unit. As well, the widths of riparian management zones (RMZ's) adjacent to or within the harvest boundaries are not universally 100 feet or greater.	

Chapter 7 of the Wisconsin BMP Field Manual specifies requirements for establishing RMZ's (riparian management zones) in association with lakes and streams. For lakes and for streams wider than 3 feet, RMZ's are to be at least 100 feet (per each side for streams), starting at the ordinary high-water mark. On page 91 of Chapter 7, tree retention requirements within RMZ's are stipulated: "Harvesting plans should leave at least 60 square feet of basal area per acre in trees 5 inches DBH (diameter at breast height) and larger, *evenly distributed*." (emphasis added).

On page 87, variations from the 100' per side RMZ width requirement are addressed:

RMZ widths greater than 100' per side "may be needed on sites that exhibit one or more (emphasis added) of the following site conditions:

- steep slopes
- long, continuous slopes
- highly erodible soils
- no ground cover or duff layer
- intensive soil disturbance near the RMZ
- Unique or sensitive waters"

RMZ widths less than 100' per side "may be suitable on sites that exhibit the following site conditions:

- flat terrain
- short slopes
- stable or undisturbed soil
- dense groundcover vegetation
- soils with high filtration rates"

Of significant note, the trigger for increasing the widths of RMZs is "one or more" of the stipulated conditions. In contrast, "one or more" does not apply to narrowing RMZs below 100' per side. That is, text on page 87 rather clearly establishes that all 5 stipulated site conditions must be present to warrant narrower RMZs.

In the absence of an argument and supporting evidence that all 5 triggers for narrower RMZ's are met, the RMZs established for the Whitney Lake harvest unit are not in compliance with the Wisconsin Best Management Practices Manual. That is:

- the RMZ's as laid out are not uniformly greater than 100' per side
- The residual trees (to be reserved from harvest) are not evenly distributed, and comprising at least 60 square feet basal area per acre.

Given that forest operations must meet or exceed BMPs, the current harvest layout constitutes a non-conformity with pertinent elements of the FSC US Forest Management Standard.

Amended 6/22/21, Following Special Audit

Fundamental to the discrepancy is a misunderstanding between the DNR and stakeholders as to how the RMZ buffer is designated in the field. The BMPs recommend a minimum 100 ft RMZ from the ordinary high water mark (OHWM) for RMZs adjacent to lakes and certain other water bodies. (see page 91 of the

BMP manual). The BMP manual also presents field conditions and a multiple factor list for when a wider RMZ is needed or a narrower RMZ is suitable. However, there is an additional buffer within the RMZ which is an equipment exclusion zone (EEZ), which is only required to be a minimum of 15 ft from the OHWM. From 15-50 ft, wheeled or tracked equipment is only allowed on frozen or dry ground.

At the Hodge Podge sale and other sales, a spot painted red line has been marked out running parallel to the shoreline. In the initial complaint submission, the complainants allege that the cutline at the Hodge Podge sale averages 50-60 ft, while the residual basal area would be less than 60 sq ft in many places in the RMZ, and 32 sq ft on average behind the no cut zone. The red line appears to be the RMZ line, and as it is clearly less than 100 ft in many places, it would be subject to the BMP's test on whether conditions are suitable for a narrower BMP. Indeed, after initial concerns were raised by stakeholders, the DNR's BMP forester reviewed the sale in June 2020, and analyzed the redline as the entire RMZ. The BMP forester concluded that it met the test to be narrowed, while the SCS complaint investigation report disagreed with this assessment, as described above.

However, in response to the complaint investigation report, it was clarified by the DNR that the redline is only the equipment exclusion zone, and that the RMZ should be measured 100 ft from the OHW, including areas falling outside the EEZ and available for harvest. This has the practical effect of creating an "inner buffer" composed of the EEZ, and an "outer buffer" composed of the remainder of the 100 ft. It is acknowledged that the terms inner and outer buffer are not found in the BMP manual and this concept is not used by DNR, SCS is using it only to illustrate the sites visited on this audit. The 100 ft RMZ itself is not marked out on the ground, but trees retained within the entire 100 ft still contribute to the basal area retention requirement. Using a 100 ft RMZ, a DNR Forest Ecologist/Silviculturist conducted an inventory of the area in May 2021 using 21 random plots and determined that the average basal area to be retained after harvest was 94 sq ft. basal area, with a range of 50-200 sq ft. The SCS auditor also took sample plots of the area and found a lowest basal area plot of 80 sq ft.

The difference between the inventory data submitted by stakeholders and the inventory plots is possibly explained by the fact that DNR marked additional trees for retention in response to stakeholder concerns after the stakeholder survey was conducted. Also, there is a difference in interpretation on how to measure the basal area of plots that fall partially within the RMZ. Regardless, based on the inventory data taken directly by the SCS auditor and the DNR data confirmed by SCS, we conclude that the average basal area of the RMZ exceeds the 60 sq ft. minimum.

However, the BMPs also state that the basal area should be retained in trees that are "evenly distributed," and a simple average of basal area in an RMZ would not capture potential variability. An RMZ in which the retained basal area was all clumped in the EEZ with little to none in the RMZ beyond the EEZ would not meet this requirement, even if the average basal area of the 100 ft was above 60 sq ft. At the Hodge Podge sale, this does not appear to be the case, because plots taken in the outer buffer in exceeded 60 sq ft.

Other completed sites visited during the audit did identify a larger discrepancy between the basal area within the EEZ and basal area in the remainder of the RMZ. For example, a completed sale at Upper Gresham Lake had plots taken by the auditor showing 20, 30, and 40 basal area in the outer zone. However, in this case the EEZ had been extended to 75 feet, beyond the minimum of 15 ft. The Jute Lake sale also included plots as low as 10 sq ft basal area, although it is acknowledged that this sale occurred more than 5 years ago, and DNR identified it as operator error. In cases such as this, the basal area is clearly not evenly distributed and in excess of 60 sq ft. Stakeholders also identified other sites around the

NHAL that exhibited a similar pattern of decreased basal area outside the EEZ, although these sites were not all sampled during the audit.

By its own terms, the BMP manual does allow for modification of BMPs if water quality is not impacted, and the sites visited during the special audit did not have visible evidence of water quality impacts. So, these modifications do not indicate automatic violations of the BMPs. However, the DNR's system for review of BMP modifications needs to be strengthened.

Because DNR clarified that the RMZ was not narrowed, an analysis of the five conditions allowing an RMZ to be narrowed is not directly pertinent here. However, the state-wide BMP forester who originally reviewed the Hodge Podge sale for BMP compliance in June 2020 explicitly analyzed the sale as if the RMZ had in fact been narrowed. This indicates that the DNR's internal system for evaluating BMP field review needs improvement in order to ensure that it is operating effectively.

Based on this, CAR 2021.1 is being maintained, but rewritten to more accurately reflect evidence from the special audit.

☒ **Non-Conformity Corrective Action Request** ☐ **Observation; no Corrective Action is required**

DNR must review its forest operations to ensure that harvest plans consistently meet or exceed Best Management Practices. DNR must also review its internal systems for BMP compliance field review in order to ensure that being BMPs are consistently being met.

FME response *(including any evidence submitted)*	
SCS review	No formal response was provided during the 2021, however the finding was not yet due.
Status of CAR:	☐ Closed ☐ Upgraded to Major ☒ *Other decision (refer to description above)*

	Finding Number: 2021.4
Finding and Deadline	
☐ **Major CAR**: Pre-condition to certification/recertification ☐ **Major CAR**: 3 months from Issuance of Final Report ☐ **Minor CAR**: 12 months or next regularly scheduled audit, whichever comes first (*surveillance or re-evaluation*) ☐ **Observation** – response is optional ☒ **Other** and deadline (specify): Minor, 12 months from date of finalization of report (July 13, 2022)	
FMU CAR/OBS issued to (when more than one FMU):	
Standard and Indicator	FSC-US indicator 4.4.d
☒ **Non-Conformity Evidence** ☐ **Observation Justification and/or Explanation**	

The FME's consultation process does not clearly make available an accessible and affordable appeals process to planning decisions (item 3 of 4.4.d). Specifically, the appeals process is not fully defined and documented. For annual property implementing plans, staff may follow various methods and chains of command to address stakeholder concerns or disputes. Per interviews with FME staff, litigation is currently considered the primary option of the appeals process, without a defined non-litigation appeal option. The FME made efforts to engage stakeholder groups, as confirmed via review of email records and interviews with stakeholders. While some concessions were made, such as creating a buffer around a newly established raptor nest on Upper Gresham Lake and marking some additional leave-trees in an uncut timber sale on Whitney Lake, it was unable to determine the main points of disagreement and/or agreement between itself and stakeholders using its informal process.	
☒ **Non-Conformity Corrective Action Request** ☐ **Observation; no Corrective Action is required** For public forests, consultation shall include an accessible and affordable appeals process to planning decisions.	
FME response *(including any evidence submitted)*	
SCS review	No formal response was provided during the 2021, however the finding was not yet due.
Status of CAR:	☐ Closed ☐ Upgraded to Major ☒ *Other decision (refer to description above)*

	Finding Number: 2021.5
Finding and Deadline	
☐ **Major CAR**: Pre-condition to certification/recertification ☐ **Major CAR**: 3 months from Issuance of Final Report ☐ **Minor CAR**: 12 months or next regularly scheduled audit, whichever comes first (*surveillance or re-evaluation*) ☐ **Observation** – response is optional ☒ **Other** and deadline (specify): Minor, 12 months from date of finalization of report (July 13, 2022)	
FMU CAR/OBS issued to (when more than one FMU):	
Standard and Indicator	FSC-US indicator 7.1.r
☒ **Non-Conformity Evidence** ☐ **Observation Justification and/or Explanation** The management plan describes the current stakeholder consultation process. However, a change in the process is expected based on the outcome of CAR 2021.4.	
☒ **Non-Conformity Corrective Action Request** ☐ **Observation; no Corrective Action is required** Once the process described in 2021.4 is concluded, the relevant section of the management plan must be updated.	
FME response *(including any evidence submitted)*	

SCS review	No formal response was provided during the 2021, however the finding was not yet due.
Status of CAR:	☐ Closed ☐ Upgraded to Major ☒ *Other decision (refer to description above)*

4.4 New Corrective Action Requests and Observations

	Finding Number: 2021.6
Finding and Deadline	
☐ **Major CAR**: Pre-condition to certification/recertification ☐ **Major CAR**: 3 months from Issuance of Final Report ☒ **Minor CAR**: 12 months or next regularly scheduled audit, whichever comes first (*surveillance or re-evaluation*) ☐ **Observation** – response is optional ☐ **Other** and deadline (specify):	
FMU CAR/OBS issued to (when more than one FMU):	
Standard and Indicator	FSC-US Forest Management Standard, v1-0, 6.6.d
☒ **Non-Conformity Evidence** ☐ **Observation Justification and/or Explanation** A review of chemical inventory storage, list of inventory, and SDS sheets at Sandhill Wildlife Management Area confirmed 7 of the chemicals maintained in inventory did not contain the required SDS sheets. However, updated SDS sheets were provided to auditor prior to closing meeting.	
☒ **Non-Conformity Corrective Action Request** ☐ **Observation; no Corrective Action is required** Workers applying chemicals must receive proper training in application methods and safety. This includes access to relevant safety data sheets for the chemicals being used.	
FME response *(including any evidence submitted)*	
SCS review	Based on the rapid response from the DNR during the audit, this finding is noted as a non-conformance, but closed.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2021.7
Finding and Deadline	
☐ **Major CAR**: Pre-condition to certification/recertification ☐ **Major CAR**: 3 months from Issuance of Final Report ☐ **Minor CAR**: 12 months or next regularly scheduled audit, whichever comes first (*surveillance or re-evaluation*) ☒ **Observation** – response is optional	

☐ **Other** and deadline (specify):	
FMU CAR/OBS issued to (when more than one FMU):	
Standard and Indicator	FSC-US Forest Management Standard, v1-0, 7.3.a
☐ **Non-Conformity Evidence** ☒ **Observation Justification and/or Explanation** Interviews with field staff indicated limited understanding of new FSC ESRA requirements related to pesticide use, specifically how any mitigation efforts required by the ESRAs are implemented on the ground. DNR staff showed strong understanding of the existing DNR procedures for pesticide approval, but some were unaware of the new policy.	
☐ **Non-Conformity Corrective Action Request** ☒ **Observation; no Corrective Action is required** There is an opportunity to improve understanding in how the new FSC Environmental and Social Risk Assessments (ESRAs) for chemical pesticides in FSC-POL-30-001 V3-0 will affect on the ground pesticide application.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

5. Stakeholder Comments

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 FME 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).

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.

5.1 Stakeholder Groups Consulted

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the comments falling within scope of the standard 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.

☒ *FME has not received any stakeholder comments from interested parties (who are not members of the enterprise under evaluation) as a result of stakeholder outreach activities during this annual evaluation.*	
Summary of Outreach Activities Conducted (Check all that apply): ☐ Face to face meetings ☐ Phone calls ☐ Email, or letter ☐ Notice published in the national and/or local press ☐ Notice published on relevant websites ☐ Local radio announcements ☐ Local customary notice boards ☐ Social media broadcast	
Stakeholder Comment (Negative, positive, and neutral)	**SCS Response**
	Extensive stakeholder consultation was conducted as part of a special audit earlier in 2021. No additional pertinent stakeholder comments were received as part of this surveillance audit.

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME's response to any open CARs.	**Yes** ☒ **No** ☐
Comments:	

7. Annual Data Update

☐ No changes since previous evaluation.	
☒ Information in the following sections has changed since previous evaluation.	
☐ Name and Contact Information ☐ FSC Sales Information ☐ Scope of Certificate ☐ Non-SLIMF FMUs ☒ Social Information	☒ Pesticide and Other Chemical Use ☐ Production Forests ☐ FSC Product Classification ☐ Conservation & High Conservation Value Areas ☐ Areas Outside of the Scope of Certification

Name and Contact Information

Organization name	State of Wisconsin, Department of Natural Resources		
Contact person	Teague Prichard		
Address	101 S. Webster Street P.O. Box 7921 Madison, WI 53707-7921	**Telephone**	608-669-8290
		Fax	
		e-mail	Teague.prichard@wisconsin.gov
		Website	dnr.wi.gov

FSC Sales Information

FSC salesperson	Collin Buntrock, WDNR, Forest Products Services Team Leader		
Address	107 Sutliff Ave Rhinelander, WI 54501-3349	**Telephone**	(608) 286-9083
		Fax	
		e-mail	Collin.Buntrock@wisconsin.gov

Scope of Certificate

Certificate type	☒ Single FMU	☐ Multiple FMU
	☐ Group	
SLIMF *if applicable*	☐ Small SLIMF certificate	☐ Low intensity SLIMF certificate
	☐ Group SLIMF certificate	
# Group Members (*if applicable)*		
Number of FMU's in scope of certificate		

Geographic location of non-SLIMF FMU(s)	*Latitude & Longitude:*	
Forest zone	☐ Boreal	☒ Temperate
	☐ Subtropical	☐ Tropical
Total forest area in scope of certificate which is:	**Units: ☐ ha or ☒ ac**	
privately managed		
state managed	1,543,827	
community managed		

Number of FMUs in scope that are:			
less than 100 ha in area		100 - 1000 ha in area	
1000 - 10 000 ha in area		more than 10 000 ha in area	1

Total forest area in scope of certificate which is included in FMUs that:	**Units: ☐ ha or ☐ ac**
are less than 100 ha in area	
are between 100 ha and 1000 ha in area	
meet the eligibility criteria as *low intensity* SLIMF FMUs	

Division of FMUs into manageable units:
Individual management units are identified by property name and responsible bureau. Within each property, stands are defined by species groups and/or age classes.

Non-SLIMF FMUs (Group or Multiple FMU Certificates)

Name	**Contact information**	**Latitude/ longitude of Non-SLIMF FMUs**	
NA			

Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
male workers: # 1500	female workers: # 700	
Number of accidents in forest work since previous evaluation:	Serious: 0	Fatal: # 0

Pesticide and Other Chemical Use

☐ *N/A - FME has not used pesticides since last audit.*				
Commercial name of pesticide / herbicide	**Active ingredient**	**Quantity applied since previous evaluation (kg or lbs.)**	**Total area treated since previous evaluation (ha or ac)**	**Reason for use**

See embedded spreadsheet	 Microsoft Excel 97-2003 Worksheet			

Production Forests

Timber Forest Products	**Units: ☐ ha or ☒ ac**
Total area of production forest (i.e. forest from which timber may be harvested)	709,359
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	88,200
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	621,159
Silvicultural system(s)	**Area under type of management**
Even-aged management	
Clearcut (clearcut size range <40)	
Shelterwood	215,000
Other: coppice	250,000
Uneven-aged management	
Individual tree selection	101,000
Group selection	143,900
Other:	
☐ Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	19,492
Species in scope of joint FM/COC certificate: *Scientific/ Latin Name* (Common/ Trade Name)	
Aspen/Popple: Populus tremuloides Populus grandidentata	
Balsam poplar Populus balsamifera	
White birch Betula papyrifera	
Eastern Cottonwood Populus deltoides	
Swamp white oak Quercus bicolor	
Silver maple Acer saccharinum	
American elm Ulmus americana	
River birch Betula nigra	
Green ash Fraxinus pennsylvanica	

White oak	Quercus alba
Bur oak	Quercus macrocarpa
Black oak	Quercus velutina
Northern pin oak	Quercus ellipsoidalis
Black walnut	Juglans nigra
Butternut	Juglans cinerea
Shagbark hickory	Carya ovata
Bitternut hickory	Carya cordiformis
Black cherry	Prunus serotina
Red maple	Acer rubrum
Hackberry	Celtis occidentalis
Scotch pine	Pinus sylvestris
European larch	Larix decidua
Norway spruce	Picea abies
Eastern redcedar	Juniperus virginiana
Blue spruce	Picea pungens
Norway maple	Acer platanoides
Boxelder	Acer negundo
Black locust	Robinia pseudoacacia
Honey locust	Gleditsia triacanthos
Eastern Hophornbeam, Ironwood	Ostrya virginiana
Musclewood, Bluebeech	Carpinus caroliniana
Sugar maple	Acer saccharum
Yellow birch	Betula alleghaniensis
White ash	Fraxinus americana
American beech	Fagus grandifolia
American basswood	Tilia americana
Northern red oak	Quercus rubra
Northern white cedar	Thuja occidentalis
Balsam fir	Abies balsamea
Eastern hemlock	Tsuga canadensis
Red Pine	Pinus resinosa
Jack Pine	Pinus banksiana
Eastern white pine	Pinus strobus
Black spruce	Picea mariana
Tamarack	Larix laricina
Black ash	Fraxinus nigra
White spruce	Picea glauca.

FSC Product Classification*

Timber products		
Product Level 1	**Product Level 2**	**Species**
W1 Rough wood	Roundwood (logs)	All species included above
W1 Rough wood	Fuel wood	included above
W3 Wood in chips	Wood chips	included above
Non-Timber Forest Products		
Product Level 1	**Product Level 2**	**Product Level 3 and Species**

Christmas trees 26 trees and 225 tons of boughs (WisFIRS export product 40 & 42T) FY18		

**Note: W1, W2, and W3 product groups usually do not require a separate evaluation to FSC-STD-40-004 (COC) if processing occurs in the field for FM/COC and CW/FM certificate types. N1-N10 (NTFPs) are eligible to be sold with FSC claims under FM/COC certification if reported here. Bamboo and NTFPs derived from trees (e.g. cork, resin, bark) may be eligible for FM/COC and CW/FM certification. NTFPs used for food and medicinal purposes are not eligible for CW/FM certification. Check with SCS if you have any products intended to be sold with an FSC claim outside of any of these categories.*

Conservation and High Conservation Value Areas

Conservation Area	**Units: ☐ ha or X ac**
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	252,767

**Note: Total conservation and HCV areas may differ since these may serve different functions in the FME's management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.*

High Conservation Value Forest / Areas			**Units: ☐ ha or ☒ ac**
Code	**HCV Type**	**Description & Location**	**Area**
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Driftless Area: Large rivers, complex floodplains, sand terraces; Large Blocks of Southern Forest; Prairie & Savanna Remnants Northwoods: Old-growth Developmental Stages HH and NH; Old-growth Developmental Stages Pines; Embedded Wetlands Glacial Outwash Plains & Lakebeds: Xeric Pine-Oak Forests; Pine-Oak Barrens; Large Peatlands, Sedge Meadow, & Wetlands Lake Michigan: Ridge & Swale Communities (inc. Lakeplain Prairie); Beach and Dune Formations; Level	21,297

		Bedrock Influenced Communities; estuaries, Green Bay Marshes Lake Superior: Freshwater Estuaries; Sandscapes; Dunes & Pine Forest; Boreal Clay Plain Forest; Apostle Islands Cliffs & Maritime Forest; Red Clay Wetlands Glaciated Southeast Wisconsin Prairies, Fens, Savannas Niagara Escarpment: Niagara Escarpment Ecological Landscape Features: 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	
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.	Driftless Area: 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 Northwoods: Old-growth Developmental Stages HH and NH; Old-growth Developmental Stages Pines ;Embedded Wetlands;	115,625

		Biologicaly Rich Freshwater Lakes Glacial Outwash Plains & Lakebeds: Xeric Pine-Oak Forests; Pine-Oak Barrens; Large Peatlands, Sedge Meadow, & Wetlands Lake Michigan: Ridge & Swale Communities (inc. Lakeplain Prairie); Beach and Dune Formations; Level Bedrock Influenced Communities; estuaries, Green Bay Marshes Lake Superior: Freshwater Estuaries; Sandscapes; Dunes & Pine Forest; Boreal Clay Plain Forest; Apostle Islands Cliffs & Maritime Forest; Red Clay Wetlands Glaciated Southeast Wisconsin Prairies, Fens, Savannas, Kettle Moraine Forest, Emergent Marshes Niagara Escarpment: Niagara Escarpment Ecological Landscape Features: Central Lake Michigan Central Sand Hills Central Sand Plains Forest Transition North Central Forest Northeast Sands Southeast Glacial Plains Southern Lake Michigan Key Ecological Features:	

		Marl Lakes, Lower Wolf River	
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Driftless Area: 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 Northwoods: Old-growth Developmental Stages HH and NH; Old-growth Developmental Stages Pines; Embedded Wetlands; Biologically Rich Wild Freshwater Lakes Glacial Outwash Plains & Lakebeds Xeric Pine-Oak Forests Pine-Oak Barrens Large Peatlands, Sedge Meadow, & Wetlands Lake Michigan: Ridge & Swale Communities (inc. Lakeplain Prairie); Beach and Dune Formations; Level Bedrock Influenced Communities; Estuaries; Green Bay Marshes Lake Superior Freshwater Estuaries; Sandscapes, Dunes & Pine Forest; Boreal Clay Plain Forest; Apostle Islands Cliffs & Maritime Forest; Red Clay Wetlands	195,669

		Glaciated Southeast Wisconsin: Prairies, Fens, Savannas; Kettle Moraine Forests; Emergent Marshes; Wisconsin's Key Ecological Features Marl Lakes; Lower Wolf River Niagara Escarpment: Niagara Escarpment Ecological Landscape Features: 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	
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
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).		776
Total area of forest classified as 'High Conservation Value Forest / Area'			333397

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

☐ N/A – All forestland owned or managed by the applicant is included in the scope.	
☒ Applicant owns and/or manages other FMUs not under evaluation.	
☒ Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.	
Explanation for exclusion of FMUs and/or excision:	The following DNR owned properties (about 37,798 total acres) are excluded from the scope of forest certification: • Agricultural fields subject to share-crop agreements (approximately 20,600 acres – (Stands with cover-type F in WisFIRS) • Specific intensive non-forest use areas, as provided below: • State Fish Hatcheries, Rearing Ponds & Rough Fish Stations (180 acres – LMS1 (4 ac./site)) • State Forest Nurseries (297 acres – WisFIRS) • Poynette Game Farm and McKenzie Environmental Center (621 acres - WisFIRS) • Boat Access Sites (718 acres – LMS2 (1 ac./access)) • Fire & Radio Tower Sites (143 acres – LMS3 (1 ac./tower)) • Ranger Stations, Administrative Offices and Storage Buildings (6,818 acres – LMS4 (2.5 ac./building)) • State Park Intensively Developed Recreation Areas (200 acres – WisFIRS) e.g. Peninsula State Park golf course, Blue Mound State Park swimming pool, Granite Peak Ski Area • Cooperatively managed state trails where the responsibility and authority for planning and management have been given to partners, primarily counties (7,321 acres) Additionally, lands leased or eased from other owners who have retained vegetative management authority are also excluded (i.e. Forest Legacy conservation easements, stream access easements, etc). *Included in the scope of forest certification are DNR fee title owned properties and the leased Meadow Valley, McMillian, and Wood County Wildlife Areas.
Control measures to prevent mixing of certified and non-certified product (C8.3):	Certified areas are well defined so that any timber sold from uncertified lands is not mixed. Certified and uncertified material is sold as part of separate timber sales.

Description of FMUs excluded from or forested area excised from the scope of certification:

Name of FMU or Stand	Location (city, state, country)	Size (☐ ha or ☐ ac)

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected for Evaluation

☒ FME consists of a single FMU

☐ FME consists of multiple FMUs or is a Group

Appendix 2 – Staff and Stakeholders Consulted

List of FME Staff Consulted

To protect privacy, only FME staff who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**

Name	Title	Contact Information	Consultation method
Teague Pritchard	State Forest Specialist		Interview
Rachel Hauser	Forestry Specialist		Interview
Paul Cuirro	Forester		Interview
Anne Reis	Wildlife Biologist		Interview
Chad Nichols	NR Region Team Supervisor		Interview
Chris Semann	NR Region Team Supervisor		Interview
Craig Anderson	Conservation Biologist		Interview
Doug Brown	County Forest & Public Lands Specialist		Interview
Eric Zenz	District Forestry Leader		Interview
Ian Remus	Forester		Interview
John Pohlman	Wildlife Biologist		Interview
Matt Zine	Conservation Biologist		Interview
Matt Raabe	Forester		Interview
Lois Larsen	NR Property Supervisor		Interview
Andy Sorenson	NR Region Team Supervisor		Interview
Mike Warnke	Deputy Division Administrator		Interview

Heather Berklund	Division Administrator		Interview
Paul Cunningham	NR Staff Specialist		Interview
Sara Herrick	Conservation Biologist		Interview
Phil Rynish	NR Program Manager		Interview
Jim Warren	Bureau Director		Interview
Diane Brusoe	Deputy Division Administrator		Interview
Justin Wooter	Conservation Biologist		Interview
Ralph Weible	Forestry		Interview
Cale Severson	Wildlife		Interview
Chad Nikols			Interview
Jennifer Boice	Forester		Interview
Eric Kramer	Fisheries		Interview
Mark Rusmussen	Wildlife Biologist		Interview
Lois Larrow	Park Manager		Interview

Contact information kept on file with SCS.

List of other Stakeholders Consulted*

To protect privacy, only stakeholders who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**

Name	Title	Contact Information	Consultation method	Requests Stakeholder Notification? (Y/N)
Jeremiah Cleland	Owner/logger	On file	Interview	N

** Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities, such communications are retained by SCS subject to FSC and ASI examination.*

Appendix 3 – Additional Evaluation Techniques Employed

☒ None.

☐ Additional techniques employed (*describe*):

Appendix 4 – Required Tracking

Pesticide Derogations

☒ There are no active pesticide derogations for this FME.

Name of pesticide / herbicide (active ingredient)		Date derogation approved
Condition	**Conformance (C / NC)**	**Evidence of progress**

Progressive HCVF Assessments

☒ FME does not use partial or progressive HCVF assessments.*

**Note: In the case the FME is not operating in the entire management unit, it is permissible to only complete an HCVF assessment for the portion of the unit in which they are operating under special conditions. In such cases, the HCVF assessment must be extended if new areas are entered without an existing, appropriate HCVF assessment having been completed. An example includes a large forest concession where harvesting is initially limited to a smaller geographic scope.*

Partial or progressive HCV must be noted in SCS tracking system for monitoring. Describe below the FME monitoring plan to ensure additional HCVF assessments are completed as necessary:

Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

☒	Not applicable; no significant issues identified that may impact the next audit.
Some issues were identified during this audit that the next audit team could consider in the next audit, such as:	
☐	Scope of certificate:
☐	Audit sampling:
☐	Audit time:
☐	Audit season:
☐	Travel time between sites or FMUs:
☐	Audit frequency:
☐	Suggested audit team competency for next audit:
☐	Suggested requirements to include during the next audit:
☐	Suggested issues investigate during the next audit:
☐	Suggested sites for inspection:
☐	Stakeholders to be consulted:

☐	Other(s) – please describe:

**Note: information audit team leaders wish to remain confidential may be communicated directly to SCS.*

Appendix 5 – Forest Management Standard Conformance Table

Criteria required by FSC at every surveillance evaluation (*check all situations that apply*)	☐ NA – all FMUs are exempt from these requirements. ☐ Plantations > 10,000 ha (24,710 ac): 2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, and 10.8 ☒ Natural forests > 50,000 ha (123,553 ac) ('low intensity' SLIMFs exempt): 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, and 9.4 ☒ FMUs containing High Conservation Values ('small forest' SLIMFs exempt): 6.2, 6.3, 6.9 and 9.4
Documents and records reviewed for FMUs/ sites sampled	☒ All applicable documents and records as required in section 7 of audit plan were reviewed; or ☐ The following documents and records as required in section 7 of the audit plan were NOT reviewed (*provide explanation*):

Requirements Reviewed in Annual Evaluation

Evaluation Year	**Requirements Reviewed** (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.)
2018	All – (Re)certification Evaluation
2019	P1, P5, and P8, *Except 8.3 (CoC).* Mandatory criteria above, and all indicators included in prior year findings.
2020	P2, P4, P7; Mandatory criteria: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.9, 8.2 and 9.4. CoC/TM
2021 (special)	Criteria 4.4, 6.3, 6.5, 7.3, 7.4, and 8.1.
2021	P6; Mandatory criteria: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.9, 8.2 and 9.4. TM
2022	

C= Conformance with Criterion or Indicator
NC= Nonconformance with Criterion or Indicator
NA = Not Applicable
NE = Not Evaluated

REQUIREMENT	**C/NC**	**COMMENT/CAR**
Principle #1: Compliance with Laws and FSC Principles: 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.		
1.1 Forest management shall respect all national and local laws and administrative requirements.	NE	
1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	NE	

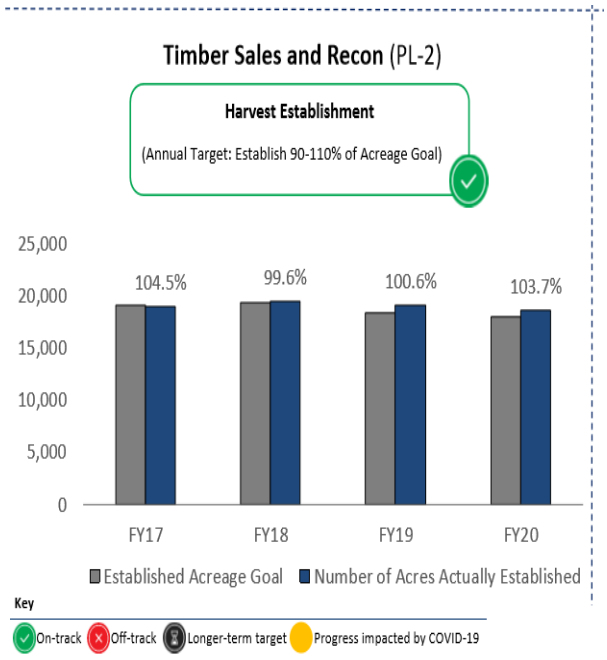
1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	NE	
1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	NE	
1.5. 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	FME provided a documented overview of its law enforcement activities. As observed during field inspection, boundaries are marked and sometimes with signs. Gates are locked and identified with DNR plates.
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	Staff interviewed stated that they work with law enforcement and real estate divisions to resolve trespass and other unauthorized activities. Common issues include posting no-trespassing signs on state land, buildings that cross property boundaries, hunting/fishing violations, etc. No timber theft actions were reported during the 2021 season.
1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	NE	
Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	NE	
2.2. 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.	NE	
2.3. 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	FME's real estate department maintains procedures to manage and settle disputes, and maintains records of all known disputes. Per interviews with staff, common trespasses include buildings that cross from private onto state lands and other forms of encroachment, and installing no-trespassing signs on state land. Negotiation of land swaps or sales of the encroached upon property are common methods used to resolve disputes, and are subject to public consultation and approval. A DNR Division of Forestry Attorney is retained who coordinates and collaborates with assigned Forestry staff to address issues that are, or might rise (proactively) to
2.3.b The forest owner or manager documents any significant disputes over tenure and use rights.	C	

		legal status. Forestry staff consulted or worked with on cases are specific to areas of expertise. No unresolved disputes were reported nor any discovered during the audit.
Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	NE	
3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	NE	
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. FME has a statewide tribal liaison to consult tribes at a government-to-government level. Other individual staff serve as liaison and contacts for individual tribes. Tribes are formally consulted during master planning and interim management planning processes to make sure that their resource rights are preserved. Each state forest has a forester in charge of outreach to tribes. A forester may put tribes in touch with a logging contractor if a specific timber sale is expected to have alternative forest products (e.g., bark, plants, bows, hunting, wild rice, firewood, etc.). The state has eleven federally recognized tribes and a twelfth that is not recognized (Brothertown Tribe). This twelfth tribe was originally from what is now New England and has no treaty rights in Wisconsin. There are six bands of Ojibwe that have off-reservation treaty rights managed through the Great Lakes Indian Fish & Wildlife Commission (GLIFWC). These tribes would like to have more power to self-regulate on state lands, similar to what they have on federal lands within the ceded territory, according to interviews with Shelly Allness. Annual Operation meetings and the Master Planning Process along with the Department's consultation policy, allow for input from Native American bands and tribes on all aspects of state forest management. Additionally, the six federally recognized Chippewa Bands in Wisconsin are currently engaged in a six year study for a self-reporting system for non-timber forest products on state lands in the ceded territory (roughly the northern 1/3 of Wisconsin).
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). Annual Operation meetings and the Master Planning Process along with the Department's consultation policy,

		allow for input from Native American bands and tribes on all aspects of state forest management. Additionally, the six federally recognized Chippewa Bands in Wisconsin are currently engaged in a six year study for a self-reporting system for non-timber forest products on state lands in the ceded territory (roughly the northern 1/3 of Wisconsin).
3.3. 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.	NE	
3.4. 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.	NE	
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	NE	
4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	C	
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	FME has a training program for new employees through HR and an employee handbook that covers laws and regulations. No serious accidents were reported in 2021. Field sites inspected during the audit generally showed safe working conditions.
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	The timber sale contract template and other contracts cover relevant safety requirements. Field sites inspected during the audit generally showed safe working conditions.
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	Contractors reviewed for the 2021 audit were FISTA-trained as evidenced by records included in packets for auditors. All FISTA training was confirmed on active sales during the 2021 audit.
4.3 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).	NE	
4.4. 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.	C	
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	C	As the entire FMP and associated documents are available to the public (e.g., https://dnr.wi.gov/topic/ForestManagement/guidelines.

impacts include effects on: • 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. A summary is available to the CB.		html), the general FMP, master plans, and interim management plans meet this requirement. Chapter 6 of the general FMP covers cultural resources, public resources are covered in several chapters (e.g., 18), aesthetics in Chapters 4 and 18, community goals and economic opportunities in several places (e.g., Chapters 9, 10, and master plans), and other people affected (e.g., indigenous people). Individual master plans include discussion of social impacts as part of a regional property analysis. Correspondence between DNR staff and the complaints was reviewed. Social concerns are mostly related to aesthetics and recreation.
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	Public input can be provided at any time per interviews with staff. The website includes who may be contacted in public comment periods are closed (e.g., https://dnr.wi.gov/topic/lands/ifmp.html, https://dnr.wisconsin.gov/topic/Lands/APIP/expanded.html, and https://dnr.wisconsin.gov/topic/timbersales/salesNHAL).
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	Per interviews with FME staff and review of site-specific planning documentation, letters are sent to adjacent landowners if it is expected that a timber harvest will abut a property boundary. Direct contact is also attempted at times. At the state-level, there is a government email distribution list that allows for interested parties to opt into notifications on certain topics and properties. Interested stakeholders may join this email list by seeking information on https://dnr.wisconsin.gov/about/NRB/public.html.
4.4.d For ***public forests,*** consultation shall include the following components: 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. 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.	NC	The https://dnr.wisconsin.gov/about/NRB/public.html page is intended to meet this requirement, as are several other components of the webpage (e.g., https://dnr.wisconsin.gov/topic/timbersales/salesNHAL). Refer to **CAR 2021.4**
4.5. 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.	NE	

Principle #5: 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.		
5.1. 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.	NE	
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	NE	
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	NE	
5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	NE	
5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	NE	
5.6. 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: • 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 (Northern and Southern state forests) is being implemented that allows calculation of growth for some state forests. Instead, forest stands are visited on a 20-year cycle for reconnaissance, which includes measurements of volume. Recon data are considered in the annual update of 15-year harvest projections. Running the comparisons as a validation of net-growth. On DNR lands are currently growing two times the amount of harvest. The FME is operating under an area-control system, which sets an annual number of acres to harvest each year. The system includes assumptions based on forest stand types and their growth rates, mortality, and silvicultural practices. Protected areas under passive management or otherwise under no-harvest restrictions are not included in AAH calculations. CFI plots have been through two, five-year cycles. While data has been collected recently, a report is still in development. See https://dnr.wi.gov/topic/ForestPlanning/forestInventory.html for more information.
5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained	C	The annual allowable harvest rate is adjusted each fiscal year based on resource needs, master planning status,

yield harvest level.		etc. The Forestry Division Strategic Leadership Team (SLT) is briefed and sets harvest targets to meet the legislative intent of Act 166. A timber sale report demonstrated offered sales are in line with allowable harvest rates.
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	Data for the last four years and CY2020 to date are shown below. Gray is establishment goal and blue is what was harvested. All values are in acres. FME is required to report to the Council of Forestry and be within +/- 10% of goal. 
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.	NA	No NTFPs are gathered commercially on the FMU. Permits are required for collection of NTFPs by the general public. Tribal members within the ceded territory covered by the Voight Decision are allowed to collect NTFPs and some timber products through tribal permits and, in some cases, permits from DNR.
Principle #6: 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.		
6.1. 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.	NE	

6.1.a Using the results of ***credible scientific analysis, best available information*** (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes: 1) Forest community types and development, size class and/or successional stages, and associated ***natural disturbance regimes***; 2) ***Rare, Threatened and Endangered (RTE) species*** and ***rare ecological communities*** (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) ***Soil resources***; and 6) ***Historic conditions*** 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	Timber Sale Handbook lists specific topics that must be addressed on the 2460 Form prior to management actions. The 2460 Form narrative section might be regarded as a mini-environmental assessment. Management history, soil types, water resources, habitat types, rare species or communities, and cultural sites are described on this form. The inventory section of the 2460 Form includes information on the forest community. Use of the 2460 Form confirmed through interview and document review.
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. The assessment must incorporate the ***best available information***, 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.	C	The 2460 Form 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 the 2460 Form, and appropriate codes for some of these items. These site-specific plans complement broad goals of master plans for long-term landscape composition. Use of the 2460 Form confirmed through interview and document review.
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.	C	Information in each 2460 Form that was reviewed for site visits was consistent with the requirements of this indicator. The 2460 Forms 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, an Interim Forest Management Plan is developed.
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.	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.
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 management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	

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. 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.	C	As part of the sale development process and filling out the 2460 Form, the forester runs a search of the Natural Heritage Inventory (NHI) database. If an element occurrence is identified then the forester consults the species guidance documents and applies avoidance measures. In some cases the forester has further questions and works with a district ecologist to develop appropriate measures. Surveys are only conducted in limited cases such as bald eagle nest surveys. In most cases, the species is considered to be present if there is appropriate habitat and the corresponding avoidance measures are applied. In most cases avoidance measures are timing restrictions. In a few instances buffers are applied (e.g. for nesting raptors).
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.	C	As part of the sale development process and filling out the 2460 Form, the forester runs a search of the NHI database. If an element occurrence is identified then the forester consults the species guidance documents and applies avoidance measures. In some cases the forester has further questions and works with a district ecologist to develop appropriate measures. Surveys are only conducted in limited cases such as bald eagle nest surveys. In most cases, the species is considered to be present if there is appropriate habitat and the corresponding avoidance measures are applied. In most cases avoidance measures are timing restrictions. In a few instances buffers are applied (e.g. for nesting raptors). Examples of RTE protection measures in practice during the 2021 audit included Blanding's turtle management in the Cylon Wildlife area.
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.	C	These priorities are evident when reviewing the 2460 Forms for each site visit in combination with the Master Plan implementation.
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).	C	All activities funded, conducted, or approved by the department are screened for potential impacts to rare species using the Natural Heritage Inventory Portal. Standard guidance and other tools are available for a large number of species, and foresters and other land managers routinely consult with wildlife and Natural Heritage Conservation staff. In addition, Conservation Wardens and Recreation Officers enforce laws related to this topic.
6.3. 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.	C	

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.	C	A variety of habitat restoration and enhancement projects are conducted annually on department lands including (but not limited to) savanna/barrens restoration, native prairie restoration, wetland restoration/enhancement, and young forest management. These activities are primarily guided by the WI Wildlife Action Plan, Joint Venture Waterfowl Plan, the Young Forest Initiative, and the various WI species management plans (turkey, etc). Property master plans identify the specific priority habitat types/work for each property based on guidance in the regional plans. Examples viewed during the 2021 audit include maintenance and restoration of remnant prairies in the Dunnville and Willow River Wildlife Areas. The audit team also viewed a deer exclusion project in Hay Creek, using a fenced area to demonstrate the effect of deer browse on regeneration in the forest.
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.	C	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 and/or labeled as a rare community with a management plan developed to feature a viable community.
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. 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). 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).	C	DNR has developed an Old-Growth and Old Forest Handbook to assist in the assessment, classification, and management of old forests. 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. In short, the Department is demonstrating exemplary efforts to protect and promote old-growth forest stands in a range of forest types. Relict old growth stands (Type 1) are typed as reserved - no management. On any managed old-growth stand – any forest management is conducted primarily to maintain or enhance old growth characteristics.

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: 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.		
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.	C	Numerous examples of restoration of habitat restoration and enhancement projects were viewed during the 2021 audit, including several examples of remnant prairie restoration and in-stream habitat work for fisheries areas. (See site notes.) These activities are primarily guided by the WI Wildlife Action Plan, Joint Venture Waterfowl Plan, the Young Forest Initiative, and the various WI species management plans (turkey, etc). Property master plans identify the specific priority habitat types/work for each property based on guidance in the regional plans. Department staff often conduct habitat work in close partnership with habitat organizations (e.g. Ruffed Grouse Society, Wild Turkey Federation, Pheasants Forever, Ducks Unlimited, Trout Unlimited, etc.).
6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent ***aquatic habitats***; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.	C	The document Wisconsin's Forestry Best Management Practices for Water Quality provides guidance on RMZ management with respect to these features. 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 sites visited during the 2021 audit showed overall compliance with BMPs. One site visited at Duncan Creek Fishery area had limited harvesting planned within an RMZ, but this was acceptable based on the need for removal of exotic species in one case, and in line with aspen management guidelines in a second case.
Stand-scale Indicators **6.3.d** Management practices maintain or enhance plant species	C	Management prescriptions for sites visited during the audit were consistently written to enhance or maintain

composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.		current or desired composition of plant species on the site. Management techniques such as controlled burning and use of herbicides are used in select areas. Often this was explicitly included in the stand level prescription on the 2460 Form.
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.	C	Seed sources come from areas around the state's two nurseries (Wi Rapids, Boscobel) through the Division's tree improvement program.
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: 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 b) vertical and horizontal complexity. Trees selected for ***retention*** are generally representative of the dominant species found on the site.	C	Foresters use written silvicultural guidelines for retaining structural diversity in even-aged management systems. The Silviculture Handbook, Section 24-17, has detailed guidelines for retention of trees in managed stands. Foresters routinely retain green trees in a harvest by prescription as well as by marking individual wildlife trees. In addition, native vegetation is retained in riparian buffers and in retention islands. The Silviculture Handbook describes legacy trees. Legacy trees may be identified in the 2460 Form narrative and then indicated in the WisFIRS database.
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. 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.	C	Foresters use written silvicultural guidelines for retaining structural diversity in even-aged management systems. The Silviculture Handbook, Section 24-17, has detailed guidelines for retention of trees in managed stands. Foresters routinely retain green trees in a harvest by prescription as well as by marking individual wildlife trees. In addition, native vegetation is retained in riparian buffers and in retention islands. The Silviculture Handbook describes legacy trees. Legacy trees may be identified in the 2460 Form narrative and then indicated in the WisFIRS database.
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: 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	There are no opening-size limits for the Lake States-Central Hardwoods region.

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. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.		
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 ***invasive species***, including: 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	A team called the Wisconsin Department of Natural Resources' Department Invasive Species Team (DIST) meets to develop tools to assist land managers in addressing invasive species. They have generated a rapid response protocol called the Wisconsin DNR's Response Framework for Invasive Species. The team also works with an advisory committee and conducts education and outreach on invasive species topics.
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.	C	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.
6.4. 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.	C	
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 ***landscape*** (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) ***GAP analyses***; 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. 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.	C	DNR has identified ecosystems that occurred naturally across the landscape. An initial GAP analysis was completed and Wisconsin's State Natural Areas (SNA) program has documented locations of native ecosystems and have protected many of these sites as SNA's. FME staff and citizens may submit element occurrences for review by Natural Heritage district ecologists. Mappers then map verified element occurrences into the natural heritage database. An example during the 2021 audit was the Cylon State Natural Area, intended to promote older stand types within a larger Wildlife Area, the majority of which is managed for early seral stages. The SNA was set up based on the presence of larger white pines in the area.
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.	C	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 the representative sample

Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.		ecosystem. The network of SNAs in Wisconsin include representative sample areas that address purposes 2 and 3.
6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: 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.	C	SNAs are not exclusively passive management. Management plans where SNAs are present document the management activities that 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. The SNA website outlines management activities that are allowed on SNAs.
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.	C	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 portal. New locations of rare species and communities are entered into the NHI database as they are found. In addition, biotic inventories are being conducted as the first step in Master Planning, where NHC ecologists survey a wide array of vertebrates, invertebrates, and plants. In addition, another GAP analysis currently is being conducted.
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.	C	Where possible, the SNA program in WI identifies the largest stands and or blocks of representative ecosystems that are present on the landscape. The Wisconsin Natural Areas Preservation Council has developed guidelines for Landscape Scale Natural Areas.
6.5 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.	C	
6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	The "Wisconsin's Forestry Best Management Practices for Water Quality" contains well-written guidelines for controlling erosion and protecting water and wetlands.
6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	NC	On most operations observed, forest operations meet or exceed Best Management Practices (BMPs) that address components of Criterion 6.5. For example, water-bars are installed at regular intervals and slash is strategically placed to control erosion when closing skid trails used in logging operations. However, see **CAR 2021.1,** which addresses the approval process for review of challenging BMP cases.

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: • 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 is only done when research indicates soil productivity will not be harmed. Low impact equipment and technologies is used where appropriate.	C	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. Confirmed by interviews with foresters and review of records. Water quality considerations including lakes or rivers potentially affected by the harvest are documented for each proposed harvest on the 2460 Form. 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 appropriate.
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: • 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.	C	Auditors inspected numerous roads, skid trails, and recreational trails, all were found to be in conformance with guidelines in the Wisconsin BMP Manual or with this indicator. Minor rutting was observed at Augusta wildlife area, but it was determined to be within an acceptable amount under the DNR guidelines.
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	C	Streamside buffers are described in detail in the BMP guidelines, with buffer zones of various sizes recommended for different watercourse widths. For most streams, buffers are 100 feet (35 feet for streams less than 3 feet wide). Field inspections during the 2021 generally found that

sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers. 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.		buffer zones as implemented were sufficient to prevent runoff or other impact to watercourses. However, see CAR 2021.1 regarding BMP implementation.
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.	C	No formal variations from the RMZ requirements in 6.5.e.1 have been requested. Variations from RMZ widths do occur as allowed within the BMPs themselves.
6.5.f Stream and wetland crossings are avoided when possible. 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.	C	Sites visited during the audit generally showed that wetland crossing were avoided, or restricted to harvesting during frozen conditions in order to protect aquatic habitat.
6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	C	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.
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.	C	Grazing is not normally on this land base, though there have been some uses of domestic livestock in the past to control invasive species. Such use is controlled through fencing and other devices, as confirmed in staff interviews.
6.6. 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.	NE	

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).	C	DNR has moved to implement the new FSC pesticide policy (FSC-POL-30-001 EN V3-0, 2019), including the new procedures for Environmental and Social Risk Assessments (ESRAs). Most of the most commonly used pesticides are covered under blanket ESRA documents produced by FSC-US, WDNR, or the University of Wisconsin. For less frequently used pesticides, the DNR has implemented an ESRA process as a part of its pesticide approval process inside its WISFRS system. All chemicals reviewed were found to be covered under the blanket ESRAs or individual site-specific ones.
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.	C	The department maintains a system of Integrated Pest Management and in addition to pesticides a variety of hand, mechanical, and prescribed burning control methods are also used. Stand treatments are documented in the WisFIRS system. DNR has a program in place to guide the application of pesticides on DNR properties or easements. The program is described in Manual Code #4230.1 Pesticide Use. The manual was revised by the Pesticide Use Team to clarify how to obtain approval for use and how to report use. The team also developed videos and conducted training programs.
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	Chemical use sites viewed during the 2021 primarily took the form of invasive control, or stand establishment in former sharecropping fields that were being converted from agricultural use back to forests. Spraying was done by hand or a sprayer mounted on an ATV or dozer.
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 has a program in place to guide the application of pesticides on DNR properties or easements. The program is described in Manual Code #4230.1 Pesticide Use. The manual was revised by the Pesticide Use Team to clarify how to obtain approval for use and how to report use. The team also developed videos and conducted training programs. However, see CAR 2021.1 related to having relevant SDSs for chemicals being used on the FMU.
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	Terrestrial Pesticide Use Report is required to be filled out after chemical applications occur. Results are monitored based on the application type (site prep or invasives control).

6.7. 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	
6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	C	Pre-harvest inspection forms were reviewed by auditors during site visits, including checking for spill kits. All site visits reviewed that loggers had spill equipment on site.
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	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).
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 contamination.	C	Review of field sites did not demonstrate any hazardous materials being stored in riparian zones or sensitive areas.
6.8. 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 ***biological control agents*** are used only as part of a pest management strategy for the control of invasive plants, ***pathogens***, 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	NHC is conducting purple loosestrife biocontrol using beetles. Division of Forestry is conducting biocontrol for Emerald Ash Borer using wasps. Procedures follow the APHIS EAB biocontrol.
6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.	C	Procedures follow the APHIS EAB biocontrol.
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 maintains forest pest specialists on staff. The majority of these specialists work on statewide projects and coordinate 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	FME reported that no GMOs are being used for any purpose.
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a The use of ***exotic species*** 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	Native timber tree species are planted on state lands, and seed sources are local. Where grasses and other herbaceous vegetation are planted on log landings or wildlife openings, 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	C	No purposeful use of exotic species occurs.

effects are actively monitored.		
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 purposeful use of exotic species occurs.
6.10. 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.	NE	
Principle #7: 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.		
7.1. 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.	NE	
7.2 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.	NE	
7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	NE	
7.4 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.	NE	
Principle #8: 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.		
8.1 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.	NE	
8.2. Forest management should include the research and data	NE	

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.		
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	Refer to C5.6. Reconnaissance data is collected pre-harvest and as part of the CFI system. See https://dnr.wi.gov/topic/ForestPlanning/forestInventory.html for more information. See also Wisconsin Forest Inventory Reporting System (WisFIRS), Public Lands Handbook chapter 100. DNR reported that in 2021 5% of the state recon was updated, as is their standard procedure.
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	Recon is conducted after large-scale loss events to reassess timber volumes according to interviews with staff. Salvage harvests are often arranged to harvest material from blow-down events. Through interviews with staff, each area is regularly inspected to detect potential thefts or damage to other resources.
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	Refer to WisFIRS report cited in C5.6. FME also maintains harvest volume records in 2460 forms and invoices. Post-harvest reports in the WisFIRS system capture records of harvested material. NTFP records are maintained in the form of permits applied for since NTFPs are not commercially harvested. For 2021, DNR reported: FY21 = 241,799 cds equivalent.
8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: 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	A variety of wildlife surveys are conducted annually to monitory the status of WI wildlife populations, including nesting bird surveys, grouse drumming transects, summer deer observations, game bird brood surveys, pheasant crowing counts, eagle/osprey flights and nest monitoring, otter/beaver flights, winter mammal track surveys, bear bait index, waterfowl flights, waterfowl and dove banding, chronic wasting disease testing, avian influenza testing, and other wildlife disease monitoring, along with a variety of other wildlife and plant monitoring. Forest Health Monitoring which includes gypsy moth and EAB surveys. The attached document provides a list (though, not comprehensive) of the many agency monitoring efforts. CFI captures data on plant communities. Invasive species monitoring currently done as part of recon. State Natural areas are monitored through inspection reports, thus addressing RSAs and HCVs. FME staff are

		ready to update GAP analyses, but are going to wait for the new FSC standard to avoid duplicative work.
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	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, as confirmed during document review for all timber sales visited.
8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	Interviews with facilities managers indicate that road monitoring is an ongoing process. FME 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. State Natural Area volunteer labor reporting. NHC produces an annual report on volunteer activities on State Natural Areas – available on DNR Website. Here is the 2020 report: https://widnr.widen.net/s/lgbtxwnpt5/snavolunteerannualreport_2020
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, as confirmed in interviews with staff. At the state-level, comments are considered and changes made to plans if warranted.
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, as confirmed in interviews with the tribal liaison staff and reviews of correspondence provided.
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.
8.3 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."	NE	
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	NE	
8.5 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.	NE	
Principle #9: 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).**		
9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	NE	
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	NE	
9.3 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.	NE	
9.4 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	Site inspections and photo points were employed on many State Natural Areas. On a more informal level, virtually all SNA sites are visited by DNR personnel or cooperators capable of reporting any significant changes in the attributes of the SNA. Also, members of the public using State Natural Areas often inform DNR staff of issues they identify while on the property (e.g., serious invasion of unwanted plants or animals, storm damage, or unauthorized site disturbance). DNR reported the following monitoring efforts pertinent to this indicator: • *Annual State Natural Area Inspections by District Ecologists. DEs visit the SNAs in their districts annually to assess the progress of any management activities and evaluate any threats to conservation values (e.g. invasive species etc.)* • *Developed a barrens monitoring protocol used to document baseline conditions and track restoration progress over time in barrens systems. We are working on similar protocols to rapidly assess baseline conditions and monitor restoration and management over time in other sensitive systems.*

		• *Ongoing biotic inventories for the Master Planning process, as well as rare species, wetlands etc.* • *Ongoing routine monitoring and reporting that results from management planning, entering "scheduled treatments" into WisFIRS, and reporting out on those planned activities once they're completed ("completed treatments"). One good example is prescribed burn evals.*
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 (e.g. presence of invasives) and appropriate measures are taken to control the risks to the HCVF attributes on the site. SNA crews across the state address these issues.
Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.		
Per field observation of species composition and management practices, Principle 10 is not applicable; all management qualifies as natural/semi-natural forest management.		

Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table

☒ Chain of Custody indicators were not evaluated during this evaluation.

Appendix 7 – Trademark Standard Conformance Table

☐ N/A, does not use/intend to use FSC trademarks for any purposes (finished with this section); or

☐ N/A, is fully integrated and all trademark uses are treated under the COC Annex to this report that includes a full review of FSC-STD-40-004 and FSC-STD-50-001.

1. General Requirements for Use of the FSC Trademarks
(FSC "checkmark-and-tree" logo, initials "FSC," and/or name "Forest Stewardship Council")

Trademark uses reviewed:

Trademark Application (on-product/promotional)	Case Approval #, or Email (include approver name & date), or other appropriate documentation	Are all elements correct? (e.g., trademark symbol, color scheme, size, etc.) If not, describe in Nonconformities below.
Website	Existing	Y ☒ N ☐
Timber sale contracts	Existing	Y ☒ N ☐
Forest Management Plans and related documents	Existing	Y ☒ N ☐

		Y ☐ N ☐	
☐ All known uses reviewed. ☒ Sample reviewed. Rationale that sample choice is sufficient to confirm requirements are met: **Use is for only for: 1) promotional purposes, 2) sales documentation, and 3) internal communications/documentations. Trademark use on site documentation (either sale announcements or timber sale contracts) for all field sites were inspected.** ☐ Trademark uses detected include those grandfathered in under prior FSC trademark rules (e.g., FSC-TMK-50-201). Place the initials "GF" by the specific Trademark Applications above. *Note: This only applies to printed items or physical promotional materials (e.g., hats, load tickets) in stock. New printings, items, and websites must be updated per FSC-STD-50-001 requirements. If the organization only has GF uses and no new uses, the rest of this checklist is NA.*			
1.2 Trademark License Agreement and valid certificate In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. *Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.*			Maintained on file by SCS Main Office/ Mantenidos en los archivos de la sede principal de SCS
Evidence 1.2: Maintained on file by SCS Main Office.			
1.6 Product Group List The products intended to be labeled or promoted as FSC certified have been included in the organization's certified product group list.			☒ C ☐ NC ☐ C w/ OBS
Evidence 1.6: ☒ Refer to Product Groups List in Public Summary Report; ☐ The following nonconformance(s) were detected in Product Groups: ; or ☐ Refer to OBS related to Product Groups:			
1.3 Trademark License Code The FSC trademark license code assigned by FSC to the organization accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.			☒ C ☐ NC ☐ C w/ OBS
1.4 Trademark Symbol The FSC logo and the 'Forests For All Forever' marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to 'FSC' and 'Forest Steward-ship Council' at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). *NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.*			☒ C ☐ NC ☐ C w/ OBS ☐ NA, one or more of noted exceptions applies/ una o más de las exenciones anotadas aplica
2.1 Restrictions on using FSC trademarks The organization **has not used** the FSC trademarks in the following ways: a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme;			☒ C ☐ NC ☐ C w/ OBS

b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the organization, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as 'FSC Golden Timber' or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.	
2.2 Translations The name 'Forest Stewardship Council' has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)	☒ C ☐ NC ☐ C w/ OBS ☐ NA, no translations / no hay traduccione s
Evidence 1.3, 1.4, 2.1, and 2.2: ☒ Refer to Trademark uses reviewed above; ☐ The following nonconformance(s) were detected ; or ☐ Refer to OBS:	
Sections 8 and 9 Graphic Rules The organization has only used FSC logos that conform to the standard requirements governing: • color and font (8.1-8.3); • format and size (8.4-8.9); • label placement (8.10); and • 'Forests For All Forever' marks (9.1-9.7).	☒ C ☐ NC ☐ C w/ OBS
1.5 Trademark Use Approval The organization has submitted all intended uses of the FSC trademarks to SCS for approval. OR The organization has **an approved trademark use management system** in place. (If the organization has a trademark use management system, complete Annex A.)	☒ C ☐ NC ☐ C w/ OBS
4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.	☒ C ☐ NC ☐ C w/ OBS ☐ NA, trademarks no used for segregation marks/ no se usan las marcas registradas en marcas de separación
Evidence Graphic Rules, 1.5, and 4.6: ☒ Refer to Trademark uses reviewed above; ☐ The following nonconformance(s) were detected ; or ☐ Refer to OBS:	

2. On-Product Use of FSC Trademarks
☒ NA, no use of on-product trademarks (*on-product checklist may be deleted*)

3. Promotional Use of FSC Trademarks
☐ NA, no use of promotional trademarks (*promotional checklist may be deleted*)

6.1 Catalogues, Brochures, and Websites When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply: • It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc. • If both FSC-certified and uncertified products are listed then a text such as "Look for our FSC®-certified products" shall be used next to the promotional elements and the FSC-certified products shall be clearly identified. • If some or all of the products are available as FSC certified on request only, this is be clearly stated.	☒ C ☐ NC ☐ C w/ OBS ☐ NA, not using trademarks in catalogues/ brochures/websites/ no se usan marcas en catálogos, folletos y páginas web
6.2 Sales and Delivery Documents When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: "Only the products that are identified as such on this document are FSC certified". *NOTE: Use of the FSC claim and certificate code on the invoices does not qualify as FSC trademark use.*	☒ C ☐ NC ☐ C w/ OBS ☐ NA, not using trademarks on templates for FSC & non-FSC products/ no se usan marcas registradas en plantillas para productos FSC y no FSC
6.3 Promotional Items All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.	☒ C ☐ NC ☐ C w/ OBS ☐ NA, not labeling promotional items
6.5 Trade Fairs When the FSC trademarks are used for promotion at trade fairs, the organization has: a) clearly marked which products are FSC certified, or b) add a visible disclaimer stating "Ask for our FSC®-certified products" or similar if no FSC-certified products are displayed. *NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.*	☒ C ☐ NC ☐ C w/ OBS ☐ NA, not using trademarks at trade fairs
Section 6.6 and 6.7 Investment/Financial Claims 6.6 When investment companies or others are making financial claims based on the organization's FSC certified operations, the organization has taken full responsibility for the use of the FSC trademarks. 6.7 Any such claims have been accompanied by the disclaimer, "FSC is not responsible for and does not endorse any financial claims on returns on investments."	☒ C ☐ NC ☐ C w/ OBS ☐ NA, not making financial claims about FSC status
7.1 and 7.2 Other Forestry Certification Scheme Logos	☒ C ☐ NC

The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.	☐ C w/ OBS ☐ NA, not using other scheme logos
7.3 Business Cards The FSC trademarks have not used on business cards to promote the organization's certification. The FSC logo or 'Forests For All Forever' marks are not used on business cards for promotion. A text reference to the organization's FSC certification, with license code, is allowed, for example "We are FSC® certified (FSC® C######)" or "We sell FSC®-certified products (FSC® C######)".	☒ C ☐ NC ☐ C w/ OBS ☐ NA, approval granted prior to July 1, 2011
7.4 Promotion with CB Logo FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.	☒ C ☐ NC ☐ C w/ OBS
Evidence 6.1-6.3, 6.5-6.7, 7.1-7.4: ☒ Refer to Trademark uses reviewed above; ☐ The following nonconformance(s) were detected ; or ☐ Refer to OBS:	

Annex A: Trademark use management system
☒ NA, not using a trademark management system (*Annex A checklist may be deleted*)

Annex B, Additional trademark rules for group FM certificate holders
☒ NA, not a group FM certificate or group does not use FSC trademarks (*Annex B checklist may be deleted*)

Appendix 8 – Group Management Program

☒ This is not a group certificate, so this appendix is not applicable.