Sustainable Forestry Initiative®
Forest Management Audit Report

State of Wisconsin: Wisconsin Department of Natural Resources – State Forests and Lands
Certificate # SCS-SFI/FM-000070

SFI 2022 Standards and Rules®, Forest Management
Recertification Audit

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SFI® Forest Management Standard

SECTION A – PUBLIC SUMMARY

Foreword

Organization of the Report

This report on the results of your audit assessment is divided into two sections. Section A provides the public summary and background information that is required by the Sustainable Forestry Initiative® Section A is made available to the public and is intended to provide an overview of the audit process, the management programs and policies applied to the forest, and the results of the audit. Section A will be posted on the SFI website and Section B contains more detailed results and information for required SFI record-keeping or for use by the Certified Organization.

Principles of SFI Forest Management

The SFI 2022 Standards and Rules® for Forest Management promotes sustainable forestry and includes measures to *protect water quality, biodiversity, wildlife habitat, species at risk and Forests with Exceptional Conservation Value.*

The 13 *SFI Principles* for Forest Management are:

1. **Sustainable Forestry:** To practice sustainable forestry to meet the needs of the present while promoting the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, climate change mitigation, biological diversity, wildlife and aquatic habitats, recreation and aesthetics.

2. **Forest Productivity and Health:** To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, invasive species and other damaging agents and thus maintain and improve long-term forest health and productivity.

3. **Protection of Water Resources:** To protect water bodies and riparian areas, and to conform with forestry best management practices to protect water quality, to meet the needs of both human communities and ecological systems.

4. **Protection of Biological Diversity:** To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, ecologically important species and native forest cover types.

5. **Aesthetics and Recreation:** To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.

6. **Protection of Special Sites:** To manage lands that are ecologically important, geologically or culturally important in a manner that takes into account their unique qualities.

7. **Responsible Fiber Sourcing in North America:** To use and promote among other forest landowners sustainable forestry that is both scientifically credible and economically, environmentally and socially responsible.

8. **Legal Compliance:** To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

9. **Research:** To support advances in sustainable forest management through forestry research, science and technology.

10. **Training and Education:** To improve the practice of sustainable forestry through training and education programs.

11. **Community Involvement and Social Responsibility:** To broaden the practice of sustainable forestry on all lands through community involvement, socially responsible practices, and through recognition and respect of Indigenous Peoples' rights and traditional forest-related knowledge.

12. **Transparency:** To broaden the understanding of forest certification to the Forest Management Standard by documenting certification audits and making the findings publicly available.

13. **Continual Improvement:** To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.

1. General Information

1.1 Name, Contact, and Certificate Information

Organization Name	State of Wisconsin: Wisconsin Department of Natural Resources – State Forests and Lands
Certification Representative	Jake Walcisak, Forest Certification Coordinator
Phone Number	715-657-5812
Address	101 South Webster Street Madison, WI 53703
Audit Dates	9 - 13 September 2024
SFI Certificate Type	☐ Single ☒ Multi-site. This Audit covered the requirements of the central organization and a subset of sites. These sites were selected based on proximity and length of time since previous audits. See Summary of Audit Itinerary for details of sampling.

2. Summary Description of the Management Unit(s)

Description of Ownership	☒ SFI: List of all sites/FMUs under scope of the certificate, including certified acres. Copy of DNR_STATE_LANDS_
Total Forest Area (Acres)	1,543,366 acres
Description of Sites and Group Membership under Scope	☐ Single site description ☒ SFI: List of all sites/FMUs under scope of the certificate, including certified acres. ☐ ATFS: Summary of Sites/FMUs under scope of certificate, including acres. ☐ Group: Description of group structure.
Management Unit Maps	Provide a link to any public maps.
Forest Types and Key Ecological Features	The department has embarked on a regional planning approach based on Ecological Landscapes. Ecological Landscapes (ELs) are regions of the state that are distinguished by unique ecological characteristics and management opportunities. These regions were delineated using a land classification system developed by the U.S. Forest Service in cooperation with other federal and state partners. A regional master plan for each of the 16 ELs in Wisconsin will include all department properties within that landscape. Properties are usually assigned to the EL within which most of their acreage resides. To date, 8 plans have been completed, 3 are in progress, 3 are in the initial planning stage and 2 remain to be planned in the future. https://dnr.wisconsin.gov/topic/fl/PropertyPlanning/About
Forest Management Planning	The management plan outlining forest management policies and objectives: See Property Planning	Facilities and Lands	Wisconsin DNR
Sustainable Harvest Level Assessment	Document review and interviews confirm the WisFIRS system (Wisconsin Forest Inventory and Reporting System) is developed and maintained to house forest inventory from all state lands. The DNR uses area regulation to determine sustainable harvest levels. Review of Growth vs Removals State Lands document indicate positive growth vs removal. The overall ratio of growth to removal is 1.88, which indicates more growth than removal.

Monitoring Program Description	See https://dnr.wisconsin.gov/topic/forestmanagement/regenmonitoring, https://dnr.wisconsin.gov/topic/ForestHealth, and https://dnr.wisconsin.gov/topic/forestmanagement/bmp for examples.

3. Audit Process

3.1 Applicable Standards and Audit Objectives

Certificate Code	SCS-SFI/FM-000070		
Audit Type	☐ Stage 1, Preliminary Review Audit	☐ Stage 2, Certification Audit	
	Re-Certification	☐ COVID-19 Additional Surveillance	
	x 1st, ☐ 2nd, ☐ 3rd or ☐ 4th Surveillance		
	☐ Transfer	☐ Expansion of Scope	
	☐ Other (*describe*):		
Applicable Standards	☒ SFI: 2022 Forest Management. *Objectives 1-4, 16-17 . Exclusions, if applicable:* ☒ SFI: Rules for Use of SFI On-Product Labels and Off-Product Marks ☒ SFI: Audits of Multi-Sites		
Multiple Standards	☐ N/A, this is not a multi-standard nor a multi-CB audit. This was a dual combined audit including FSC® US Forest management.		
	☒ Combined	☐ Joint	☐ Integrated
	A combined audit is when a client is being audited against the requirements of two or more	*A joint audit is when two or more auditing organizations cooperate to audit a single client.*	*An integrated audit is when a client has integrated the application of requirements of two or more management systems standards into a single management system and is being audited against more than one standard.*
SFI Substitute or Modified Indicators	☒ None, ☐ Yes, Substitute or Modified Indicators used and justification:		
Certificate Scope/ Statement	The scope of the certificate includes all forest management activities associated with the Organization's sustainable forest management system with defined forest lands located in Wisconsin and including the harvest unit and associated landing site(s), and other forest management system activities for the Audit Objectives. The Organization has sufficient control over any contracting or outsourcing of forest management planning and activities to ensure conformance to applicable certification requirements. These forest management activities occur on approximately 1.5 million acres of Wisconsin state forest, park, fisheries, and wildlife lands.		
Description of Sampling Approach	Categories included in the DNR Lands forest certification review include: • State Forests • State Parks		

	• State Recreation Trails • State Wildlife Areas • State Fisheries Areas • State Natural Areas • Natural Resource Protection and Management Areas • Lower Wisconsin Riverway • State Wild Rivers • State Owned Islands • Stewardship Demonstration Forests The following DNR properties (about 37,798 acres) are excluded from the certification project: • Agricultural fields/Cooperative farming agreements (due to pesticide use and potential GMO issue) • Stream Bank Protection Areas (eased lands not under DNR management) • Forest Legacy Easements (eased lands not under DNR management) • States Fish Hatcheries and Rearing Ponds (intensive non-forest use) • State Forest Nurseries (intensive non-forest use) • Nonpoint Pollution Control Easements (eased lands not under DNR management) • Poynette Game Farm and McKenzie Environmental Center (intensive non-forest use) • Boat Access Sites (intensive non-forest use) • Fire Tower Sites (intensive non-forest use) • Radio Tower Sites (intensive non-forest use) • Ranger Stations (intensive non-forest use) • Administrative Offices and Storage Buildings (intensive non-forest use) • State Park Intensively Developed Recreation Areas (intensive non-forest use) e.g. Peninsula State Park golf course, Blue Mound State Park swimming pool • State Trails Cooperatively Managed by Others (planning and management authority given to others by MOU; primarily counties). In 2024, sites were sampled in the Dodgeville, Fitchburg, and Richland Center team areas, including Aztalan State Park, Jennings Creek Wildlife Area, Kettle Moraine State Forest-South Unit, Lake Kegonsa State Park, Lodi Marsh State Wildlife Area, Rocky Run Natural Area, Baraboo Hills Recreation Area, Dell Creek Wildlife Area, Devils Lake State Park, Governor Dodge State Park, Lower Wisconsin State Riverway, Mirror Lake State Park, Rocky Arbor State Park, Douglas Hallock Demonstration Forest, and Kickapoo Wildlife Area.
Deviations from the Audit Plan	Were there any significant deviations from the Audit Plan? ☒ No ☐ Yes. If yes, provide a description and explanation.

3.2 Audit Team

Auditor name:	Tom Harlan	Auditor name:	Tom Harlan
Qualifications:	Tom Harlan graduated from North Carolina State University in 1983 with a BS in Forestry. He has over 40 years' experience in the forestry profession including experience in timber		

	procurement, timber sale administration, forestry consulting and TIMO land management. Tom was a water quality engineer with the Virginia Department of Forestry where he worked with loggers and landowners to protect water quality and enforce the Chesapeake Bay Act provisions concerning forest operations. Tom managed land that was certified to SFI and FSC forest management standards and was audited to those standards. He was a FSC COC administrator for a small timber company on the Eastern Shore of Maryland. Tom joined SCS Global Services in October 2023 as a Technical Specialist. He is a SFI FM, SFI FS, ATFS, SBP, and FSC CoC Lead Auditor.		
Auditor name:	Sterling Griffin	Auditor name:	Sterling Griffin
Qualifications:	Sterling Griffin, Technical Specialist, Forest Certification – Sterling is a California Registered Professional Forester #2805 living in southern Oregon. He is a graduate of Purdue University with a degree in Forest Management. His career began with the U.S. Forest Service where he participated in long-term ecosystem productivity research in the Pacific Northwest. He later founded a consulting firm serving private landowners managing timber, water, recreation, fuels, and biodiversity. In 2007, he helped SCS establish its GHG verification program and later founded one of the largest U.S. developers of forest carbon credits. He is a FSC and SFI FM Lead Auditor and has evaluated over 20 million hectares of forestland around the world.		

3.3 Total Time Spent on Audit

A. Number of days spent on-site for the Audit	5
B. Number of auditors participating in on-site audit	2
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	3
E. Total number of person days used in audit	**13**

3.4 Summary of Audit Itinerary and Site Visits

Location(s) sampled	Dodgeville, Fitchburg, and Richland Center regions including different types of State Land management programs.
Number of field sites	22
Summary of Cover Types visited	White-red-jack pine, Aspen-birch, Spruce-fir, and Maple-beech-birch (and other Northern hardwood mixes).
Summary Description /Number of Silviculture Activities inspected	Final harvest of ash, red pine and aspen-birch, thinning of white pine, even-aged and uneven-aged management of northern hardwood types, shelterwood harvests to regenerate oaks, thinning of pine stand to release planted oak. Wildlife management activities such as planned prescribed fire, mowing, and forestry mulching.
Summary Description of Road infrastructure inspections	Road and stream crossing maintenance, installation of water bars, broad-based dips, and rocked ford.

3.5 Evaluation of Management Systems

SCS deploys teams with expertise in forestry and other relevant fields to assess the certified organization's conformance to SFI standards and policies. Audit methods include reviewing documents and records, interviewing 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 relevant stakeholder input. When there is more than one team member, each member may review parts of the standards based on their background and expertise. Applicable aspects of the Management System under evaluation, such as Management System Review and other relevant Objectives, Performance Measures, and Indicators will also inform the audit team. On the final day of an evaluation, team members convene to deliberate the findings of the audit jointly. This involves an analysis of all relevant field observations, interviews, reviewed documents and records, and relevant stakeholder input. 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.

3.6. Changes to Management System

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

☐ Significant changes that affect the management system occurred since the last audit described as follows (describe):

3.7 Confirmation of Meeting Audit Objectives

The objectives for this audit included:

a.   Determination of the conformity of the client's management system, or parts of it, with audit criteria (Selected Objectives, Performance Measures, and/or Indicators).

b.   Determination of the ability of the management system to ensure the client meets applicable statutory, regulatory and contractual requirements.

c.   Determination of the effectiveness of the management system to ensure the client can reasonably expect to achieve specified objectives.

d.   As applicable, identification of areas for potential improvement of the management system.

Audit Objectives were met	**Yes** ☒ **No** ☐ If no, provide an explanation:

4. Results of Audit

4.1 Grading of Possible Findings

Once a consensus is reached by the audit team, determinations of grading are made as to the level of findings. Grading of findings may occur as follows:

- *Major CARs*: Major Corrective Action Requests (CARs) occur when one or more of the SFI 2022 Standard(s) performance measures or indicators has not been addressed or has not been implemented to the extent that a systematic failure of a Certified Organization's SFI system to meet an SFI objective, performance measure or indicator occurs.

- *Minor CARs:* An isolated lapse in SFI 2022 Standard(s) implementation which does not indicate a systematic failure to consistently meet an SFI objective, performance measure or indicator.
- *Opportunities for Improvement:* Opportunities for Improvement (OFIs) are identified by audit team members where the client is in conformance, but there is a risk to conformance in the future. Nonconformance with the standard requirements cannot be recorded as OFIs.
- *Exceeds:* Practices that exceed the basic requirements of the SFI 2022 Standards and Rules for Forest Management or Fiber Sourcing.

4.2 Table of Audit Results and History of Findings for Certificate Period

This table lists Findings to the Performance Measure and/or Indicator level for each year of the certificate period and is updated annually.

SFI Objective	Cert/Re-cert Evaluation (2023)	1st Annual Evaluation (2024)	2nd Annual Evaluation (2025)	3rd Annual Evaluation (2026)	4th Annual Evaluation (2027)
No findings	☐	☐	☐	☐	☐
1		Minor 1.1.5			
2	OFI 2.2.8	Minor 2.2.8			
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13	OFI 13.1.2	Minor 13.1.3			
14					
15					
16					
17					
COC					
Trademark					
Group					
Other					

4.3 General Description of Evidence of Conformity

This section summarizes the general evidence found to verify conformity that is detailed in Appendix 5.

SFI Objective	Summary of Evidence
Objective 1. Forest Management Planning. To ensure forest management plans include long-term sustainable harvest levels and measures to avoid	Wisconsin DNR maintains a detailed complex management and GIS system (WisFIRS) for managing State Lands. Management Plans and

forest conversion or afforestation of ecologically important areas.	Interim Management Plans are utilized based on Wisconsin ecological landscapes. Forest inventory is maintained and utilized for guidance on sustainable harvest levels. Personnel are trained, knowledgeable and experienced to develop and implement forest management activities. Review of all field sites in 2024 confirmed accurate maps and ground conditions were represented within prescriptions and harvest plans. No conversions to non-forest use was observed.
Objective 2. Forest Health and Productivity. To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, afforestation, deploying integrated pest management strategies, minimized chemical use, soil conservation, and protecting forests from damaging agents.	WisFIRS System is maintained for foresters to schedule reforestation which issues alerts so that sites are promptly reforested. Regional ecological impacts of reforestation or afforestation are discussed as part of the master planning or Interim Forest Management Plan (IFMP) process. Ecological plans for reforestation are bounded by the master plans, or in the Interim Forest Management Plan if a master plan is not in place; reforestation projects are discussed at annual integrated property meetings to assure that proposed reforestation meets property objectives.
Objective 3. Protection and Maintenance of Water Resources. To protect the water quality and water quantity of rivers, streams, lakes, wetlands, and other water bodies.	Review of twenty-two (22) field sites confirmed Protection and Maintenance of Water Resources. Qualified personnel and harvest contractors were confirmed during implementation of forest management activities. No BMP issues were observed, and Riparian Management Zones were protected and observed during field site audit of all sites.
Objective 4. Conservation of Biological Diversity To maintain or advance the conservation of biological diversity at the stand- and landscape- level and across a diversity of forest and vegetation cover types and successional stages including the conservation of forest plants and animals, aquatic species, threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.	Invasive Species management was reviewed for all field sites during 2024 audit. Wisconsin DNR has a very active program to address specific invasive species with qualified and trained personnel. Foresters use written silvicultural guidelines for retaining structural diversity in even-aged management systems. 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. A variety of habitat restoration and enhancement projects are conducted annually on department lands including (but not limited to) barrens restoration, native prairie restoration, wetland restoration/enhancement, and young forest management. WIDNR also has an intranet resource for Priority Habitat Management Guides. These guides and tools direct staff in managing high

	priority resources such as barrens, wetlands, grasslands, oak forests and young forests.
Objective 5. Management of Visual Quality and Recreational Benefits. To manage the visual impact of forest operations and provide recreational opportunities for the public.	Not evaluated.
Objective 6. Protection of Special Sites. To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.	Not evaluated.
Objective 7. Efficient Use of Fiber Resources. To minimize waste and ensure the efficient use of fiber resources.	Not evaluated.
Objective 8. Recognize and Respect Indigenous Peoples' Rights. To recognize and respect Indigenous Peoples'' rights and traditional knowledge.	Not evaluated.
Objective 9: Climate Smart Forestry To ensure forest management activities address climate change adaptation and mitigation measures.	Not evaluated.
Objective 10. Fire Resilience and Awareness To limit susceptibility of forests to undesirable impacts of wildfire and to raise community awareness of fire benefits, risks, and minimization measures.	Not evaluated.
Objective 11. Legal and Regulatory Compliance To comply with all applicable laws and regulations including, international, federal, provincial, state, and local.	Not evaluated.
Objective 12. Forestry Research, Science and Technology. To invest in research, science, and technology, upon which sustainable forest management decisions are based.	Not evaluated.
Objective 13. Training and Education. To improve the implementation of sustainable forestry through appropriate training and education programs.	Not evaluated.
Objective 14. Community Involvement and Landowner Outreach. To broaden the practice of sustainable forestry through public outreach, education, and involvement, and to support the efforts of SFI Implementation Committees.	Not evaluated.
Objective 15. Public Land Management Responsibilities. To participate and implement sustainable forest management on public lands.	Not evaluated.
Objective 16. Communications and Public Reporting To increase transparency and to annually report progress on conformance with the SFI Forest Management Standard.	Public Reports are available on Wisconsin DNR website but not listed on SFI website as required.
Objective 17. Management Review and Continual Improvement: To promote continual improvement in	Records of program reviews, agendas and notes from management review meetings confirmed

| the practice of sustainable forestry by conducting a management review and monitoring performance. | detailed process for review. Review of internal and external audits confirmed compliance. |

4.4 Existing Corrective Action Requests, OFIs, and Exceeds

OFI 2023.1: PM 2.2.8, part i: Use of management practices appropriate to the situation, such as the use of spill response plans and chemical spill kits.

Action to Correct: No harvest sites visited were active during the audit. The state requirement is to maintain an accessible spill containment and clean-up kit appropriate for the material on the operation. There was no evidence of violations of this requirement during onsite inspection of idle equipment; no spills or persistent leaks on equipment were observed. It was not possible to inspect inside the cab or in compartments to verify if spill kits were available on harvest equipment. It is also possible that operators could keep spill kits in trailers or transport vehicles onsite. Given that spill kits must be accessible, and not necessarily located on harvest equipment, there is an opportunity to review best practices for back-up options, such as recommending that oil absorbent sheets be available on harvest equipment. Same as FSC 2023.2 OBS.

Response: Wisconsin DNR requires logging contractors to maintain training through the Forest Industry Safety and Training Alliance (FISTA) www.fistausa.org/fista/default.asp All Wisconsin DNR timber harvesting contracts require the Purchaser to ensure at least one in-woods person actively engaged in performance of the contract and responsible for the logging site complies with this training requirement. To be considered Trained as a Qualified Logging Professional (QLP) an individual must complete the following: 12 hours of Core Curriculum – Best Management Practices (BMP) for Water Quality and Basic Core II (Endangered species, logger safety, and OSHA); 4 hours (annually) of Continuing Education.

Spill kits on each individual machine is not required by Wisconsin BMP's for Water Quality. This topic will be considered during the next review of the BMP manual.

SCS Review: Inspection and interviews with contractor of the one active harvest indicated that a complete spill kit was not on-site, but the contractor was aware of the need for the spill kit.

This OFI has been raised to a Minor Nonconformance (2024.1)

OFI 2023.2 PM 13.1.2, part i: Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer continuing education training courses that shall be taken by qualified logging professionals at least once every two years to maintain their status. The continuing education training course(s) shall address one or more of the following topic: logging safety.

Action to Correct: There were no active operations during the site visit. Staff described health and safety requirements for heavy equipment operators, which include having processes and procedures to ensure health and safety of all forest workers. In these interviews and per observation of idle equipment onsite, the audit team concluded that the certificate holder has the opportunity to review lockout-tagout procedures or training for relevant logging equipment considering the level of risk and restrictions due to contractor relationships.

Response: All Wisconsin DNR timber harvesting contracts include the following language. The Purchaser is responsible to comply with, and assure compliance by all employees or subcontractors with, all Occupational Safety and Health Act (OSHA) requirements for the health and safety of Purchaser's employees. The Purchaser agrees to notify, and obtain agreement from, the Seller if the Purchaser

intends to modify performance required under the contract for the purpose of compliance with OSHA requirements.

Wisconsin DNR requires logging contractors to maintain training through the Forest Industry Safety and Training Alliance (FISTA) www.fistausa.org/fista/default.asp All Wisconsin DNR timber harvesting contracts require the Purchaser to ensure at least one in-woods person actively engaged in performance of the contract and responsible for the logging site complies with this training requirement. To be considered Trained as a Qualified Logging Professional (QLP) an individual must complete the following: 12 hours of Core Curriculum – Best Management Practices (BMP) for Water Quality and Basic Core II (Endangered species, logger safety, and OSHA); 4 hours (annually) of Continuing Education.

All new foresters and forestry technicians receive training on how to interact safely with equipment. This includes safe approach angles and safe distances to active equipment. DNR staff do not interact with inactive logging equipment owned by others.

SCS Review: Reviews of contracts and training records indicate the Wisconsin DNR uses trained logging contractors that are aware of the OSHA requirements. During a site visit to an active harvest, the contractor properly secured his equipment before speaking to the auditor.

This OFI is Closed.

4.5 New Corrective Action Requests, OFIs, and Exceeds

Finding Number: 2024.1	
Finding and Deadline	☐ Major: Pre-condition to certification ☐ Major: 3 months from Closing Meeting ☒ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing ☐ OFI: no deadline ☐ Exceeds: no deadline ☐ Other deadline (specify):
SFI Indicator:	SFI 2.2.8, part i. Use of management practices appropriate to the situation, such as: a. notification of adjoining landowners or nearby residents concerning applications and chemicals used; b. appropriate multilingual signs or oral warnings; c. control of public road access during and immediately after applications; d. designation of streamside and other needed buffer strips; e. use of positive shutoff and minimal-drift spray valves; f. aerial application of forest chemicals parallel to buffer zones to limit drift; g. monitoring of water quality or safeguards to ensure proper equipment use and *protection* of streams, lakes, and other water bodies; h. appropriate transportation and storage of chemicals; **i. use of spill response plans and chemical spill kits;** j. filing of required state or provincial reports; and/or k. use of methods to ensure *protection* of *threatened and endangered* species.
☒ **Non-Conformity** ☐ **Background/ Justification in the case of OFI or Exceeds**	

Auditor visited active harvest operation and through interviews of contractor on site, it was determined that there was no complete spill kit on site. There was active harvesting, forwarding and trucking occurring during the site visit. Phone interview with the foreman of company that was not onsite, indicated the spill kit was in his truck. The contract clause 18 and the Timber Sale Contractor Checklist Pre-Sale Meeting form 2460-009 section 16 indicates required compliance with WI BMP's. The WI BMP manual requires that a complete spill kit be on site when equipment is operating.

Root Cause Analysis *(to be prepared by Organization)*	*Analysis of the cause that led to the non-conformity.* Staff administering timber sales are required by handbook to verify the presence of a spill kit at initial pre-sale meetings and during active inspections. In part, the root cause lies in clarification of the word "verify" as it applies to visual or verbal verification. The secondary root cause is the responsibility of purchasers to maintain a complete spill kit onsite during operations as part of their FISTA training and compliance with the BMPs for Water Quality manual which is a requirement of all DNR Timber Sale contracts.
Correction *(to be prepared by Organization)*	*Evidence of correcting the identified non-conformity.* For all staff who administer timber sales to use the Timber Sale Contractor Checklist: Pre-Sale Meeting (Form 2460-009) and Timber Sale Inspection Form (2460-002) to verify and document the presence of a complete spill kit is onsite and remains on site, to the best of our abilities, while also recognizing contractor responsibility.
Corrective Action Plan *(to be prepared by Organization)*	*Description of the actions to be taken to prevent reoccurrence of the non-conformity. This is due to the lead auditor within 5 days of closing meeting, although implementation of the correction and corrective action plan may take longer.* BACKGROUND: The audit team observed the absence of a complete spill kit onsite during operations. Each piece of equipment did contain a bucket and shovel. However, missing from the job site were absorbent material and plugs/clamps to stop a leak from a hydraulic line break. These two items were in the foreman's work truck which was off site for a period of two days while he roofed his home. The DNR forester did verify a spill kit onsite with the purchaser during the pre-sale meeting and documented this on the Timber Sale Contractor Checklist. CURRENT PRACTICES: Wisconsin DNR Division of Forestry has systems and policies in place to assure compliance with BMPs for water quality, including provisions for spill kits. The information below details these systems and policies. Wisconsin DNR requires logging contractors to maintain training through the Forest Industry Safety and Training Alliance (FISTA). All Wisconsin DNR timber harvesting contracts require the Purchaser to ensure at least one in-woods person actively engaged in performance of the contract and responsible for the logging site complies with this training requirement. To be considered Trained as a Qualified Logging Professional (QLP) an individual must complete the following: 12 hours of Core Curriculum – Best Management Practices (BMP) for Water Quality and Basic Core II (Endangered species, logger safety, and OSHA); 4 hours (annually) of Continuing Education. All DNR State Lands timber sale contracts require the purchaser to follow the BMP Water Quality manual. The requirement for a spill kit is well defined in the manual (see page 116). This includes the four necessary components of a spill kit. Division of Forestry Timber Sale Handbook requires administering forestry staff to

	verify and document the presence of a complete spill kit at pre-sale meetings by using the *Timber Sale Contractor Checklist: Pre-Sale Meeting* (Form 2460-009). Those individuals administering timber sales must also verify and document the presence of a skill kit on all active operations using the *Timber Sale Inspection Form* (2460-002). The Applied Forestry Section conducts regular BMP Water Quality monitoring. The current format, which started in 2013, monitors specific land ownerships every 5 years and includes state forest lands among several other landownership types. This long-term monitoring has shown high rates of correct application on state owned lands in the category of "fuels, waste, and spills". Most recently in 2023, a correct application of 98.7% was documented with 100% in both 2018 and 2013 were recorded. CORRECTIVE ACTION PLAN: An article will be published in the internal Division of Forestry newsletter, (ForesTREEporter). This weekly newsletter is the means by which critical information is distributed to all Division of Forestry employees. This newsletter is required reading for staff. The purpose of the article would be to remind/educate staff of the existing handbook language and forms regarding spill kit requirements on timber sales. This may also be referred to Division specialist and/or management teams for their review of handbook language and guidance provided to staff about spill kits on timber sales. If updated, guidance may include the requirement for staff to visibly verify spill kits to ensure its presence on site and to confirm it contains all necessary components. Other opportunities to communicate with staff may include district in-service trainings, timber sale administration training, and Forest Certification annual trainings.
SCS Review of Action Plan	☒ Accepted ☐ Rejected (*explain*): SCS representative: **Brendan Grady** 12/20/24
Evidence and Actions Implemented by Organization	
SCS Review of Implemented Actions	
Status of Finding:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

Finding Number: 2024.2	
Finding and Deadline	☐ Major: Pre-condition to certification ☐ Major: 3 months from Closing Meeting ☒ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing ☐ OFI: no deadline

	☐ Exceeds: no deadline ☐ Other deadline (specify):
SFI Indicator:	13.1.3 Staff education and training sufficient to their roles and responsibilities.

☒ **Non-Conformity** ☐ **Background/ Justification in the case of OFI or Exceeds**

Management system procedures were not properly implemented on the Lodi Dodi timber sale. A new forester found that 65 acres were harvested with zero loads of timber accounted for in the pre-paid load ticket system. DNR did receive mill copies for only three loads, although pre-paid haul tickets were not used with these loads as required. Documents indicate the mandatory pre-sale meeting with DNR staff and the logging contractor was not done onsite and signed, as is required in the Timber Sale Handbook, and there were only 3 harvest inspections done with the first being done 6-weeks after cutting began. The logging contract breach has been properly forwarded to legal and upper management for ongoing investigation and resolution. Therefore, a minor Corrective Action Request is issued to provide forest workers with sufficient guidance and supervision to adequately implement their respective components of the plan (management system), as required by the indicator.

Root Cause Analysis *(to be prepared by Organization)*	*Analysis of the cause that led to the non-conformity.* Administering forestry staff did not conduct a pre-sale meeting onsite with the operator/purchaser prior to harvest operations beginning. The *Timber Sale Contractor Checklist: Pre-sale Meeting* (Form 2460-009) was not used. The pre-sale meeting occurred verbally, over the phone only. Secondarily, the root cause may include the lack of "notification" a contractor is required to provide DNR prior to starting a sale. Notification language is not present in the timber sale contract template or prospectus template. Some foresters provide notification language in their prospectuses, but this varies across the state. The *Timber Sale Inspection Form* (2460-002) was utilized, but not as prescribed in handbook. There are numerous mandatory items which must be checked for contract compliance during each site visit. While the proper form was used, the entries only indicated the dates a forester visited the site. No other information was recorded. Lastly, the frequency of timber sale inspections was not conducted on a regular basis as operation of the sale dictated. This is prescribed in handbook.
Correction *(to be prepared by Organization)*	*Evidence of correcting the identified non-conformity.* For all staff who administer timber sales to use the Timber Sale Contractor Checklist: Pre-Sale Meeting (Form 2460-009) and Timber Sale Inspection Form (2460-002). To conduct pre-sale inspections with each purchaser onsite prior to operations commencing and to regularly inspect timber sale operation.
Corrective Action Plan *(to be prepared by Organization)*	*Description of the actions to be taken to prevent reoccurrence of the non-conformity. This is due to the lead auditor within 5 days of closing meeting, although implementation of the correction and corrective action plan may take longer.* CURRENT PRAXTICES: Wisconsin DNR Division of Forestry has policies and systems in place to address this CAR. The Timber Sale Handbook specifically requires administering forestry

	staff to conduct a pre-sale meeting with the operator/purchase of each timber sale prior to harvest operations commencing. This must occur onsite and be documented on the *Timber Sale Contractor Checklist: Pre-sale Meeting* (Form 2460-009). All items on this form must be addressed before signing by the DNR administering forestry staff and the operator/purchaser. Additionally, handbook requires personnel involved with timber sales to inspect active sales on a regular basis as operation of the sale dictates. These inspections must be documented on the *Timber Sale Inspection Form* (2460-002). The frequency of site visits may vary depending on factors such as weather, operator experience, sale complexity, operator tenure with DNR, financial status with DNR, past performance issues, etc. CORRECTIVE ACTION PLAN: An article will be published in the internal Division of Forestry newsletter (ForesTREEporter) to all Division of Forestry employees for awareness. This will reinforce the importance of our existing systems, handbook policies and forms regarding timber sale administration. This may also be referred to Division specialist and/or management teams for their review of handbook language and guidance provided to staff specific to timber sale administration. Other opportunities to communicate with and train staff may include district in-service trainings, timber sale administration training, and Forest Certification annual trainings. Dodgeville Area leadership has already addressed this matter with local staff as a means to prevent it from occurring in the future.		
SCS Review of Action Plan	☒ Accepted		☐ Rejected (*explain*):
	SCS representative: **Brendan Grady**		Date: **12/20/24**
Evidence and Actions Implemented by Organization			
SCS Review of Implemented Actions			
Status of Finding:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*		

Finding Number: 2024.3	
Finding and Deadline	☐ Major: Pre-condition to certification ☐ Major: 3 months from Closing Meeting ☒ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing ☐ OFI: no deadline ☐ Exceeds: no deadline ☐ Other deadline (specify):

SFI Indicator:	1.1.5 Documentation of forest management consistent with assumptions in harvest plans.
☒ **Non-Conformity** ☐ **Background/ Justification in the case of OFI or Exceeds**	
Review of WisFIRS records indicate that only 4 of 15 completed harvest operations visited had the next treatment scheduled in WisFIRS. Next scheduled treatments can include regeneration monitoring following operations, thinning, or harvesting and is required stand data to be updated in WISFIRs according to the Timber Sale Handbook. Therefore, a minor Corrective Action Request is issued to address the non-conformance with indicator 1.1.5.	
Root Cause Analysis *(to be prepared by Organization)*	*Analysis of the cause that led to the non-conformity.* The root cause analysis has determined handbook language is unclear regarding the timeline in which recon updates must occur. Existing handbook language for the updating of recon is being interpreted differently amongst staff.
Correction *(to be prepared by Organization)*	*Evidence of correcting the identified non-conformity.* For all forestry staff who are responsible for recon updates, do so in a timely manner after a timber sale is closed-out. This includes all information contained within the WisFIRS "Recon" tab.
Corrective Action Plan *(to be prepared by Organization)*	*Description of the actions to be taken to prevent reoccurrence of the non-conformity. This is due to the lead auditor within 5 days of closing meeting, although implementation of the correction and corrective action plan may take longer.* CURRENT PRACTICES: The Public Forest Lands Handbook requires recon (all data within the WisFIRS Recon tab) to be updated when a timber sale is closed-out. This includes scheduling the next treatment for each stand which was part of the timber sale being closed-out. Treatments may include commercial, non-commercial, cultural practices, and/or regeneration checks. CORRECTIVE ACTION PLAN An existing WisFIRS-based report can be run which identifies all stands that don't have a scheduled treatment. Division of Forestry staff will analyse available data to determine the frequency in which stands from closed-out timber sales are not being scheduled for their next practice. This analysis and the report mentioned above will be provided to a combination of Division specialist and/or management teams for their review of handbook language and guidance provided to staff. Screenshot of WisFIRS reports, illustrating the existing report "Stands without Scheduled Treatments".

	Recon & Assessments | Report Number	Report Name	Report Description
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101	Property Cover Type Acreage	Acreage of all cover types
102	Property Forest Type Acreage	Acreage of forested cover types
103	Forest Type Age Distribution	Age distribution by forest type displayed both tabular and graphically
109	Cover Type Acreage by Stand Prefix	Acreage of cover types by stand prefix
114	RECON Status	Acreage of RECON by age and percentage of total acres in 5 year increments. Total recon acres and total forested acres are also shown.
115	RECON Accomplishment	Acreage of RECON completed in last five year period shown by year and cumulative.
116	Blank NF Field Stand Sheet - Report 116	NF Field Stand Examination Data Sheet
119	Property Summary	Summarizes recon acres, primary cover type
120	Property Summary By Cover Types	Summarizes GIS and Recon acres by forested, and non-forested types
Form 2400-26	Stand Examination Data Sheet	Blank data sheet for paper entry of RECON for new stands
	Stands without Scheduled Treatments	Stands without Scheduled Treatments	

SCS Review of Action Plan	☒ Accepted	☐ Rejected (*explain*):
	SCS representative: **Brendan Grady**	Date: **12/20/24**
Evidence and Actions Implemented by Organization		
SCS Review of Implemented Actions		
Status of Finding:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*	

5. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Sustainable Forestry Initiative standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the Certified Organization's response to any open CARs.	**Yes** ☒ **No** ☐
Comments: None	