Forest Management and Stump-to-Forest Gate Chain-of-Custody Certification Evaluation Report for the:

Wisconsin Department of Natural Resources

Conducted under auspices of the SCS Forest Conservation Program
SCS is an FSC Accredited Certification Body

CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00070N

Submitted to:

Wisconsin Department of Natural Resources

Lead Author: Dr. Robert Hrubes

Date of Field Audit: September 15-19, 2008

Date of Report: December 16, 2008

Certified: Month, Day, Year

By:

SCIENTIFIC CERTIFICATION SYSTEMS
2000 Powell St. Suite Number 1350
Emeryville, CA 94608, USA
www.scscertified.com

SCS Contact: Dave Wager dwager@scscertified.com
Wisconsin DNR Contact: Paul Pingrey, paul.pingrey@dnr.state.wi.us

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the SCS website (www.scscertified.com) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of the Wisconsin Department of Natural Resources.

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Wisconsin Department of Natural Resources to conduct a certification evaluation of its forest estate. Under the FSC/SCS certification system, forest management operations meeting international standards of forest stewardship can be certified as "well managed", thereby enabling use of the FSC endorsement and logo in the marketplace.

From September 15 – 19, 2008, an interdisciplinary team of six (6) natural resource specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 5 day field and office audit of the subject property as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team determined conformance to the 56 FSC Criteria in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to Wisconsin Department of Natural Resources, for the management of its 1.5 million acre forest estate. In the event that a certificate is awarded Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION
1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	Wisconsin Department of Natural Resources
Contact person	Paul Pingrey
Address	101 S. Webster St. PO Box 7921, Madison, WI 53707-7921
Telephone	608-266-1727
Fax	608-266-8576
E-mail	paul.pingrey@dnr.state.wi.us
Certificate Number	SCS-FM/COC-00070N
Certificate/Expiration Date	*2013*
Certificate Type	*single forest management certificate with forest gate chain-of-custody*
Forest zone	*temperate*
Total forest area in scope of certificate:	1.5 million acres. All lands are state managed, including 513,000 acres of state forests and 984,157 acres of Land Division properties.
Chemical pesticides used	*List of active ingredients: tetramethrin and phenothrin, glyphosate, 2-4-d, dimethylamine ester, imazamox, ammonium sulfate, 2-4-d butoxyethanol ester, s-metolachor r-enantiomer, triclopyr, imazapyr, piperohyl butoxide and bendiocarb, terbuthylazine and haloxyfop, aminopyralid, imazapic, sodium chloride, carbaryl, tebuthiuron, picloram, clopyralid*
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	The forest is a mosaic of conifer and hardwood cover types, classified by species dominance; e.g., white pine, spruce-fir, northern hardwoods, central hardwoods, oak, aspen, planted pine stands
List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products	Round wood, pulpwood, sawtimber, firewood and other non-timber forest products

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 (sq m)	0.09290304
acre (ac)	hectare (ha)	0.4047

Volume Conversion Factors

Volume

To convert from	to	multiply by
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
gallon (gal)	liter	4.546

1 acre = 0.404686 hectares
1,000 acres = 404.686 hectares
1 board foot = 0.00348 cubic meters
1,000 board feet = 3.48 cubic meters
1 cubic foot = 0.028317cubic meters
1,000 cubic feet = 28.317 cubic meters

Breast height = 1.4 meters, or 4 1/2 feet, above ground level

Although 1,000 board feet is theoretically equivalent to 2.36 cubic meters, this is true only when a board foot is actually a piece of wood with a volume 1/12 of cubic foot. The conversion given here, 3.48 cubic meters, is based on the cubic volume of a log 16 feet long and 15 inches in diameter inside bark at the small end.

1.2.1 Environmental Context

This report addresses the five-year reassessment of the Wisconsin DNR pursuant to the FSC guidelines for forest management certification assessments as well as the forest management certificate awarded by Scientific Certification Systems (SCS-FM/COC-00070N). The Wisconsin Department of Natural Resources was first awarded certification for the State Forests in May 2003. Annual audits were completed for the State Forests in each subsequent year from 2003 – 2007. During the 2007 annual audit of the State Forests, a preliminary assessment was completed to address the proposed expanded scope of the certificate. The proposed expansion includes additional lands administered by the Division of Land, including state parks, wildlife management areas, and scientific and natural areas. The proposal is to have all state-managed lands achieve certification. A public summary of the initial evaluation and subsequent annual audits is available on the SCS website (www.scsceertified.com).

This report includes the expansion of the scope of the certificate to include additional lands managed by the Wisconsin DNR. The expanded scope of the certificate includes the state forests, state parks, and scientific and natural areas. The assessment was conducted with the applicable FSC regional standard, the Lake States-Central Hardwoods Region (USA) Regional Forest Stewardship Standard Version 3.0.

WDNR land included in the project includes approximately 1.5 million acres as shown in the following table:

Wisconsin DNR Lands – based on a May 2008 DNR real estate snapshot (acres).

	Fee and Leased Land	Outside Certification Scope	Certified Land
State Forests (Certified in 2004)	553,736	36,002	517,734
"Other" DNR Land (Parks, Wildlife Areas, Etc.)	1,060,825	94,597	966,228
All DNR Land	1,614,561	130,599	1,483,962

Categories included in the forest certification assessment include:

- Northern and Southern 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

At the time of the last annual audit (July 2007), there were two (2) open Corrective Action Requests (CARs) related to monitoring reports and woody debris guidelines. The last annual audit focused on reviewing the open CARs and included a pre-assessment to address the proposed expanded scope of the certificate. The field component of the pre-assessment took place on July 16-19, 2007. The pre-assessment was performed in conjunction with the 2007 annual surveillance audit of the Wisconsin State Forests FSC-endorsed forest management certificate (SCS-FM/COC-00070N).

The Wisconsin DNR has responsibilities for managing 517,000 acres of state forests that were first certified in 2003. The DNR believes that there has been sufficient benefits accrued from participation in forest certification to warrant expansion of the scope of their certificate to include 966,000 acres of properties managed by its Land Division. The benefits of certification are perceived to include strengthened marketability of products and retention of manufacturers who are actively seeking certified forest products. The assessment and auditing process also provide beneficial opportunities to identify potential challenges and solve problems that results in continual performance improvements. The social benefits of certification include improved public support and reduced controversy related to land management activities.

While 84 percent of Wisconsin's forests are hardwood types, state managed lands also offer opportunities to maintain or restore conifer forest communities. There are also areas of important barrens, savanna, wetland and prairie communities that play an important role in maintaining favorable conditions for many of the 1,800 native plant species and 657 vertebrate species found in the state. The State Natural Area Program has grown to 590 sites encompassing more than 150,000 acres of land and water. The majority of State Natural Areas (354 sites) are located on DNR lands. State Natural Areas protect outstanding examples of native natural communities, significant geological formations, and archaeological sites. They harbor natural features essentially unaltered by human-caused disturbances or that have substantially recovered from disturbance over time. More than 90% of the plants and 75% of the animals on Wisconsin's list of endangered or threatened species are found on habitats protected within State Natural Areas.

1.2.2 **Socioeconomic Context**

The scope of the certificate includes state forests managed for diverse forest-based uses as well as Land Division properties that provide significant socioeconomic benefit. These property types include: State Parks, Wildlife Areas, Recreation Areas and Trails, Fisheries Areas and Natural Areas, Natural Resource Protection and Management Areas, Lower Wisconsin Riverway, State Wild Rivers, State Owned Islands and Stewardship Demonstration Forests. Wisconsin households spend over $5.5 billion per year on goods and services associated with forest-based recreation.

Timber production and tourism contribute significantly to the state's overall economy. In Wisconsin, more than 1,850 wood-using companies produce nearly 20 billion dollars of forest products every year. More than 300,000 Wisconsin jobs rely on the forest products industry. Recreation is one of the primary uses of the State Forests with over two million visitors annually on the Northern Highland/American Legion State Forest alone. Hunting, hiking, boating,

fishing, camping, cross country skiing, and snowmobiling are examples of popular recreational activities that occur on state lands.

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

1.3 Forest Management Enterprise

1.3.1 Land Use

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

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

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

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

The following regulations apply to state land management in Wisconsin and have relevancy to the certification assessment:

- Statutory authority to engage in forest certification (broadly interpreted): §§23.11, 28.01, 28.07, and 77.80
- DNR Manual Codes and Handbooks
- Wisconsin Pesticide Law (Chapter 94, WI Statutes)

- Use of Pesticides on Land and Water Areas of the State of Wisconsin (WI Administrative Code, Chapter NR 80)
- Wild Animals and Plants Law (Chapter 29, WI Statutes) and WI Administrative Code NR 10
- Wisconsin Water Law: UW Booklet
- Wisconsin Groundwater Law (Chapter 160, WI Statutes)
- Navigable Waters (Chapter 30, WI Statutes)
- Water Quality Standards for Wetlands (Chapter NR 103, WI Administrative Code)
- Wisconsin Shoreland Management Program (Chapter NR 115, WI Administrative Code)
- Endangered and Threatened Species (Chapter NR 27, WI Administrative Code)
- Wisconsin Historic Preservation Laws

List of treaties and international agreements at the federal level that are relevant to the operation:

- Clean Water Act (Section 404 wetland protection)
- Occupational Safety and Health Act
- National Historic Preservation Act
- Archaeological and Historic Preservation Act
- Americans with Disabilities Act
- U.S. ratified treaties, including CITES
- Endangered Resources Laws

1.3.2 Land Outside Scope of Certification

The following DNR properties (about 130,000 acres) are explicitly excluded from the certification project and the reason for exclusion is included in parenthesis:

- Agricultural fields (intensive non-forest use)
- 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 fish rearing sites, only)
- 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)
  Meadow Valley Wildlife Area (Leased Federal lands)

DNR makes no claims that would indicate that these properties outside of the scope are FSC certified. Additionally as indicated in Section B.2.2, DNR has appropriate procedures in-place to ensure that only timber from lands within the scope of the certificate is sold as “FSC”.

1.4 Management Plan

1.4.1 Management Objectives

The WDNR uses a Property Master Planning process to determine how a property will be managed and developed. By administrative code the master plan is the controlling authority for all actions and uses on a property. The development of master plans is governed by Chapter 44 (Natural Resources) of the Wisconsin Administrative Code--the master planning rule. This rule defines master planning; sets forth its purposes, specifies the general planning process and the content of a master plan. This rule also establishes a uniform land management classification system to be applied in the master plan. NR 44.04(9) states; *A master plan establishes the authorized management and development on a property, and only those management and development activities identified in the master plan may be pursued by the department*. NR 44.04(11) further states; *When internal department guidelines and directives conflict with the provisions of a master plan, the master plan shall control.*

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

The purposes of the master plan and planning processes include the management of resources on Department properties in accordance to land use capabilities, consistent with the long-term protection and use of these resource, as required by NR 1.60(4). The plans also provide the basis for decision-making consistent with the Wisconsin Environmental Policy Act (WEPA). Plans integrate department programs and provide clear direction on management with a long-range vision and goals. Plans establish management objectives, priorities and prescriptions and provide an opportunity for interested persons and organizations to provide input. The plans also contribute to the budget process.

1.4.2 Forest Composition

The Department of Natural Resources adopted an ecological classification system to consistently organize its land-based ecological planning, management, and monitoring activities. This system divides the state into 16 ecologically similar regions, based on climate, soils, existing and pre-settlement vegetation, topography, types of aquatic features present, and other factors. They also have unique sets of conservation needs and opportunities. They differ in levels of biological productivity, habitat suitability for wildlife, presence of rare species and natural communities, and in many other ways that affect land use and management. The distribution and abundance of plants and animals across the state has been, and continues to be, determined by both natural factors and human-induced disturbance patterns. Historically, many species reached the edge of their range in a narrow band that runs from northwestern to southeastern Wisconsin. This narrow band, known as the "Tension" or "Transition" Zone, separates the northern forest (including the boreal forest) from the southern forest and prairies.

1.4.3 Silvicultural Systems

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

1.4.4 Organization and Scope

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

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

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

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

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

1.4.5 Monitoring System

DNR has a multi-faceted monitoring system. There is also a citizen-based monitoring network in the state with support from a DNR grant program. The WDNR monitoring system includes monitoring Best Management Practices (BMPs), use of the Forest Recon Data System/WisFIRS, and the well-established Forest Inventory and Analysis Program (FIA). The WDNR is also beginning to implement a Sustainability Framework that is based upon Criteria and Indicators that will aid in monitoring land use conditions and changes in the state. A key component of the monitoring system is the process associated with master plans. Reports resulting from monitoring activities are publicly available. Monitoring and reporting is also completed for specific areas of interest including deer impacts, tree improvement, forest health, and climate change.

1.4.6 Estimate of Maximum Sustainable Yield

The Wisconsin DNR uses an area control method for calculating the Annual Allowable Timber Harvest. The system defines the number of acres that can be harvested each year, on a sustained basis, without depleting the resource over time. It is calculated based on inventoried forest data collected by field staff in combination with long range planning (e.g. Master Planning) considerations. A property's ecological, economic, and societal constraints are considered in this determination. The land manager uses this information to determine a predicted year of harvest for each stand of trees. The combination of these stands, and their associated treatments, represents the number of acres to be evaluated for harvest in a particular year. The annual allowable timber harvest is a long term monitoring figure. Yearly fluctuations are common due to changing conditions created by storms, insect & disease infestations; changing timber markets, fires, or backlogged workload.

Both Long Term harvest goals and Annual harvest goals are established through the planning procedure in the WisFIRS database. In calculating those figures local harvest constraints may be applied to fine-tune the rotation ages and thinning intervals. Early and late constraints (within silvicultural sideboards) also allow local managers to temper harvest peaks and valleys in scheduled timber sales.

The Long Term Harvest Goal in WisFIRS represents the annual allowable harvest for public lands in Wisconsin. It provides long-term annual harvest goals by forest type and harvest type, over a 15 year period. Any backlogged practices are apportioned out equally over the 15 years. Long-term timber sale monitoring compares timber sales established and deferred against this figure.

1.4.7 Estimated, Current and Projected Production

DNR is required to prepare a report specifying the total timber harvest (acres established to be used rather than cut acres) on each forested property for the previous biennium. The initial report was due on January 1, 2007 on a biennial reporting cycle with reports submitted to the Council on Forestry. The Council on Forestry prepares a report containing reasons for noncompliance and recommendations on methods of ensuring that the timber harvest is consistent with the established annual allowable timber harvest. The report is only required if harvest is less than 90% or more than 110% of annual allowable timber harvest. The reports are

prepared biannually and submitted to the Governor, DNR, and appropriate standing committees of legislature.

The most recent report indicates that the allowable harvest in the two-year period of 2005-2006 was 54,250 acres. During the 2005-2006 period 25,818 acres of timber sales were established. This level of harvest represents 69% of the allowable harvest on a total statewide ownership of 1.5 million acres.

On an annual basis, about 1 % of the land under DNR administration is actively managed each year according to a 2007 report to the Wisconsin Legislature. In the last three years, an average of 14,985 acres were established for harvest per year. Of this, two-thirds of the harvests occur on State Forests (which constitute 1/3 of the DNR land base). Reflecting a greater focus on non-timber objectives, other DNR land such as wildlife areas and state parks (with 2/3 of the land base) produce 1/3 of the average annual harvest acreage.

Of the area harvested over 70% of the management prescriptions are thinnings, which reduce the density of stems to accelerate growth of the remaining trees and vertical structural diversity within the stand harvested. Approximately 30 % of the stands actively managed each year are harvested using regeneration techniques. After harvest these stands are either replanted or regenerate naturally and will continue to grow and produce forests and wood products for future generations. These regenerating forests also provide important habitat for species associated with young forests such as the snowshoe hare and woodcock.

Harvested stands are either regenerated naturally or are planted with seedlings. The determination of which method to use is based on the ability of the site to regenerate naturally and the ability of the desired species to regenerate on a particular site. For example, if a site experiences hot and dry conditions planting may be the best alternative. This is most common for the pine species, especially jack pine.

Even-aged and uneven-aged management schemes are the harvest systems employed on Wisconsin DNR's land. Even-aged management includes clearcuts, clearcuts with reserves, seed tree methods, shelterwood cuttings, and intermediate thinnings. Uneven-aged management includes both individual and group selection techniques. Each of these systems and techniques are designed in conjunction with a particular tree species or community of trees. For example, uneven-aged single tree and group selection techniques are used in northern hardwoods, hemlock-hardwood, and swamp hardwood stands. In contrast, even-aged clearcuts are used in pine (red, white, and jack), paper birch, aspen, oak, northern hardwoods, scrub oak, aspen, fir-spruce, and black spruce stands. The selection of a management system and specific technique depends on many factors including tree composition, age of the stand, location, accessibility, and most importantly the long-term objectives for the stand under consideration."

1.4.8 Chemical Pesticide Use

The WDNR has an established pesticide regulations outlining Department approval, use and reporting of chemicals for disease, pests, and management. The Department uses various

methods for disease and pest control at its facilities and for land management. The DNR has prepared guidance on complying with the FSC policy regarding highly hazardous pesticides and received a derogation for the use of hexazinone.

Pesticides Used on Wisconsin DNR Lands (2007-2008)

Chemical Name	Active ingredients	Permitted by FSC
6-Pro	tetramethrin and phenothrin	x
Accord	Glyphosate	x
Amine 4 2,4-D weed killer	2-4-d, dimethylamine ester	x
Aquastar	Glyphosate	x
Beyond	imazamox	x
Buccaneer Plus	Glyphosate	x
Class Act NG	ammonium sulfate	x
Cornerstone Plus	Glyphosate	x
Credit Xtra	Glyphosate	x
Crossbow Herbicide	2-4-d butoxyethanol ester	x
Dual II	s-metolachor r-enantiomer	x
Element 3-A	triclopyr	x
Element 4	triclopyr	x
Escort	metasulfron methyl	x
Escort XP	metasulfron methyl	x
Garlon 3A	triclopyr	x
Garlon 4	triclopyr	x
Garlon 4 Herbicide	triclopyr	x
Garlon DA	triclopyr	x
Gly Star	Glyphosate	x
Glyphomax	Glyphosate	x
Glyphos Extra	Glyphosate	x
Glyphosate	Glyphosate	x
GlyPro	Glyphosate	x
Glystar	Glyphosate	x
Glystar Plus	Glyphosate	x
Habitat	imazapyr	x
Hornet	piperohyl butoxide and bendiocarb	x
Milestone	aminopyralid	x
Milestone VM	aminopyralid	x
Mirage Plus	Glyphosate	x
Plateau	imazapic	x
Quik Pro	Glyphosate	x
Raid Wasp Killer	imidcloprid	x
Rascal Plus	Glyphosate	x
Razor Pro	Glyphosate	x
Roundup	Glyphosate	x
Roundup PRO	Glyphosate	x
Roundup Ultra	Glyphosate	x
Roundup Ultra Max	Glyphosate	x
Salt	sodium chloride	x
Spike 80DF	tebuthiuron	x
Tahoe	triclopyr	x
Tahoe 4	triclopyr	x

Tahoe 4A	triclopyr	x
Tahoe 4E	triclopyr	x
Tordon K	picloram	x
Tordon RTU	picloram	x
Touchdown Herbicide	Glyphosate	x
Touchdown Total Pro	Glyphosate & imazapyr	x
Transline	clopyralid	x
Transline herbicide	clopyralid	x
Weedone Brand 638	2-4-d, butoxyenthanol ester	x

2.0 GUIDELINES/STANDARDS EMPLOYED

As the applicant is located in Wisconsin, the certification evaluation that is the subject of this report was conducted against the duly-endorsed Lake States-Central Hardwoods Region Version 3.0 (Feb. 10, 2005). The standard is available at the FSC-US web site (www.fscus.org) or is available, upon request, from Scientific Certification Systems (www.scscertified.com).

3.0 THE CERTIFICATION ASSESSMENT PROCESS

3.1 Assessment Dates

The assessment was completed in September 2008 with the field assessment occurring from September 15 – 19, 2008.

Main Evaluation:

3.2 Assessment Team

Robert J. Hrubes, Ph.D., FSC Lead Auditor
Dr. Hrubes is a California registered professional forester (#2228) and forest economist with over 30 years of professional experience in both public and private forest management issues. He is presently Senior Vice-President of Scientific Certification Systems. In addition to serving as team leader for the Wisconsin state forestlands evaluation, Dr. Hrubes worked in collaboration with other SCS personnel to develop the programmatic protocol that guides all SCS Forest Conservation Program evaluations.

Dr. Hrubes has previously led numerous SCS Forest Conservation Program evaluations of North American public forests, industrial forest ownerships and non-industrial forests, as well as operations in Scandinavia, Chile, Japan, Malaysia, Australia and New Zealand.

Dr. Hrubes holds graduate degrees in forest economics, economics and resource systems management from the University of California-Berkeley and the University of Michigan. His professional forestry degree (B.S.F. with double major in Outdoor Recreation) was awarded from Iowa State University. He was employed for 14 years, in a variety of positions ranging from research forester to operations research analyst to planning team leader, by the USDA Forest Service. Upon leaving federal service, he entered private consulting from 1988 to 2000. He has been Senior V.P. at SCS since February, 2000.

Michael Ferrucci, SFI Lead Auditor
Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 18 years. Its clients include private citizens, land trusts, municipalities, corporations, private water companies, and non-profit organizations. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies.

Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies.

Kathryn Fernholz, Audit Team Member; Forestry Specialist
Kathryn Fernholz is Executive Director of Dovetail Partners, a non-profit organization based in Minneapolis that works on issues related to sustainable forestry and responsible trade. Kathryn is a forester with training and experience in silviculture, forest management in the Lake States region, and private lands forestry. Kathryn has been working with family forest owners and related forest management interests since 1999. Her work has included projects throughout the Upper Midwest and has ranged from assisting with the development of forestry cooperatives and the growth and development of landowner associations to supporting a variety of family forest certification efforts. Kathryn has been a leader within the forestry community in the Upper Midwest through her service as Chair of the Minnesota Society of American Foresters and her appointment to the Minnesota Forest Resources Council. Kathryn is a member of the Advisory Board for the Blandin Foundation's Vital Forests/Vital Communities Initiative, and she is also a member of the Board of Directors for the Minnesota Environmental Partnership and the College of Food, Agricultural and Natural Resource Sciences Alumni Society. Kathryn has a B.S. in Forest Resources from the University of Minnesota, College of Natural Resources and also studied at the College of Saint Benedict in St. Joseph, MN and Sheldon Jackson College in Sitka, Alaska.

Bernie Hubbard, Audit Team Member; Forestry Specialist
Bernie Hubbard is currently serving as President of the Society of American Foresters. As a licensed forester with the state of Michigan, Bernie has over 40 years of forest management experience in the Lake States region. Bernie served as the State Forester and Assistant Chief of the Michigan Department of Natural Resources from 2002 to 2005 and as MDNR Upper Peninsula Forest Supervisor between 1998 and 2002. Prior to this, he spent 13 years as District Forest Supervisor for the MDNR Lake Superior State Forest. In 1995 Bernie led the development of a sustainable forest management planning process that was adopted by MDNR as a model for forest resource planning. In addition, Bernie was involved in the establishment and growth of Eastern Upper Peninsula Partners in Ecosystem Management, a group of major landowners and natural resource managers in the Eastern Upper Peninsula to facilitate and compliment ecosystem management across all ownerships. Active in the Society of American

Foresters on both the state and national level, Bernie was elected SAF fellow in 2002 and was presented the Outstanding Service to the Society award in 2000.

Gary Zimmer, Audit Team Member; Wildlife Biology Specialist
Gary Zimmer is the Western Great Lakes Regional Biologist for the Ruffed Grouse Society and resides in Laona, Wisconsin. Gary has extensive certification experience in Wisconsin having participated on the initial FSC and SFI main assessments for the Wisconsin County Forest Program and the DNR State Forests. In March of this year, Gary participated as an auditor in the FSC recertification assessment for the Menominee Tribe.

Gary joined the Ruffed Grouse Society in December of 2000 after 18 years with the US Forest Service, working as a District Biologist on the Lakewood/Laona Ranger District. He received his B.S. degree in wildlife management in 1976 and received a M.S. degree in natural resources in 1979 from the University of Wisconsin – Stevens Point. His M.S. thesis was entitled "The Status and Distribution of the Common Loon in Wisconsin". An avid outdoorsman, Gary enjoys hunting, fishing, camping, outdoor photography and is a licensed bird bander. Gary is a Certified Wildlife Biologist and recently completed a two year term as Secretary/Treasurer for the Wisconsin Chapter of the Wildlife Society. Gary currently is the chairman of the Habitat Assessment and Management Committee for the Wisconsin Bird Conservation Initiative.

Gary has a significant background in forest management having worked throughout his career in planning and implementing a variety of wildlife and fish habitat projects. He has participated on a variety of forest management reviews in Wisconsin and has received numerous Special Achievement Awards throughout his career. Gary is especially proficient in the management of forest bird habitat both in his professional and private life.

JoAnn Hanowski, M.Sc., Audit Team Member; Biology/Ecology Specialist-
JoAnn M. Hanowski was a senior research fellow at the University of Minnesota-Duluth's Natural Resources Research Institute. She has considerable expertise evaluating the effects of forest management on wildlife habitat, and is currently working on research projects involving the response of birds to various forest management practices in stream and seasonal pond buffers and the development of indicators of forest and water health and sustainability in Minnesota and across the Great Lakes. She was a member of the forest bird technical team for the original GEIS and participated on the wildlife technical team that wrote forest management guidelines for Minnesota. She is a participant in a 14-year project for monitoring avian populations on the Chequamegon National Forest. She is currently a member of the riparian science technical committee that is investigating the effectiveness of Minnesota's current guidelines for forest management in riparian systems. She has published 64 peer-reviewed journal articles and over 75 reports in her 21 year tenure with the University of Minnesota. In 2005 JoAnn participated in the largest forest certification project ever conducted in the United States, the joint FSC/SFI certification of Minnesota's state lands. In 2006 and 2006 JoAnn contributed regional ecological expertise to the annual surveillance audits of the MN DNR's FSC and SFI certificates.

3.3 Assessment Process

The scope of the assessment included: document review, auditors spending time in the field and office, interviewing management personnel and, as appropriate, interacting with outside stakeholders. To enhance the efficiency and effectiveness of the assessment, the audit team was divided into two three-person teams that traveled to different sites. The use of two teams allowed the assessment to view more diverse and geographically dispersed field sites.

The audit teams inspected a variety of field sites to assess conformance with the Lakes States-Central Hardwoods FSC Regional Standard. During the assessment planning the Lead Auditor and the WDNR representative reviewed the range of field activities and formulated a sampling plan. The Lead Auditor and WDNR representatives first determined appropriate sample areas or geographic strata within which to sample field sites. The Lead Auditor then used randomized selection methods to select a subset of all available sales and assigned a priority number to each site. Wisconsin DNR staff members worked with the lead auditor to designate the final selection list from this prioritized list and final adjustments were made during the audit to ensure flexibility and allow for additional samples as needed. Local foresters assisted with scheduling appropriate field site visits in a manner that balances efficiency of travel routes, the priority number for sites, and factors designed to assure coverage of key issues under the certification requirements.

3.3.1 Itinerary

Field sites and schedule of site visits:

Day 1 – Opening meeting WDNR Offices in Madison

Participants:

Dave Birren, WI DNR, Land Division, Forest Certification Coordinator
Tom Boos, WI DNR, Forestry, Invasive Species
Alan Crossley, WI DNR, Wildlife Management, Public Lands Management Specialist
Kate Fitzgerald, WI DNR, Facilities and Land, Chief, Land Management Planning Section
Randy Hoffman, WI DNR, Endangered Resources, State Natural Areas Ecologist
Bob Mather, WI DNR, Director Bureau of Forest Management
Janel Pike, WI DNR, Forestry, GIS Coordinator/WISFIRS Project Manager
Jeff Prey, WI DNR, State Parks
Paul Pingrey, WI DNR, Forestry, Certification Coordinator
Teague Prichard, WI DNR, Forestry, State Forest Coordinator

Auditors Present:

Robert Hrubes, Lead Auditor
Mike Ferrucci, Lead Auditor
Bernie Hubbard, Team Member
JoAnn Hanowski, Team Member
Gary Zimmer, Team Member
Kathryn Fernholz, Team Member

10 AM Meetings (3 concurrent meetings)

1 – Planning	2 – Public Use Mgmt	3 – Endangered Resources
Mike Ferrucci	Robert Hrubes	Gary Zimmer
Kathryn Fernholz	Bernie Hubbard	JoAnn Hanowski
Randy Hoffman, WDNR, Land, State Natural Areas Ecologist	Carrie Morgan, WDNR, CAES Division, Bureau of Education and Information	Drew Feldkirchner, WDNR, Land, Conservation Biologist
Ann Runyard, WDNR, Land, GIS	Keith Warnke, WDNR, Land, Big Game Specialist	Kelly Kearns, WDNR, Land, Invasive Plant Coordinator
Loren Ayers, WDNR, Land, Bureau of Endangered Resources, Ecologist	Peter Biermeier, WDNR, Land, Bureau of Parks and Recreation	Sharene Smith, WDNR, Real Estate Closing Officer
Tom Watkins, WDNR, Land, Planner		Signe Holtz, WDNR, Land, Endangered Resources, Bureau Director
Alan Crossley, WDNR, Land, Wildlife Mgmt		
John Pohlman, WDNR, Land, Land Management Specialist		

11:15 AM Meetings (3 concurrent meetings)

1 – Forest Health	2 – Planning & Training	3 – Public Use
Mike Ferrucci	Robert Hrubes	Gary Zimmer
JoAnn Hanowski	Kathryn Fernholz	Bernie Hubbard
Eunice Padley, WDNR, Forestry, Forest Ecologist/Silviculturist	Rebecca Gass, WDNR, Forestry, Policy and Planning Analyst	Bob Mather, WDNR, Forestry, Director, Bureau of Forest Management
Thomas Boos, WDNR, Forestry, Forest Invasive Plant Coordinator	Mark Heyde, WDNR, Forestry, Chief, Planning and Analysis Section	Paul Pingrey, WDNR, Forestry, Forestry Certification Coordinator
Avery Dorland, WDNR, Forestry, Forest Geneticist and Nursery Coordinator	Quinn Williams, WDNR, Forestry Attorney	Teague Prichard, WDNR, Forestry, State Forests Coordinator
Darrell Zastrow, WDNR, Forestry, Director, Office of Forest Sciences	Michael Lutz, WDNR, Deputy Chief Counsel	Jeff Barkley, WDNR, Forestry, County Forest/Public Lands
David Lentz, WDNR, Forestry, Conservation Biologist	Janel Pike, WDNR, Forestry, GIS Coordinator, WISFIRS Project Manager	Kathy Mather, WDNR, Forestry, Forest Tax Section Financial Specialist
Jane Cummings Carlson, WDNR, Forestry, Forest Health Specialist	Wendy McCown, WDNR, Forestry, Director, Bureau of Forestry Services	James Warren, WDNR, Forestry, Chief, Forest Lands

Day 1 – Afternoon (Sept. 15)

- Goose Lake Wildlife Area /SNA

- Reviewed grassland management and timber harvesting to restore grassland habitats, active operator with contractor on site

- Red Cedar Lake State Natural Area
  - Reviewed management goals and invasive species control activities including biological controls for purple loosestrife
- Aztalan State Park

Participants:

Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Doug Fendry, WDNR, Area Wildlife Supervisor
Mark Aquino, WDNR, South Central Region Land Leader
Jacob Fries, WDNR, Wildlife Biologist
Jeff Prey, WDNR, State Parks Planner
Randy Hoffman, WDNR, State Natural Areas Ecologist
Matt Zine, WDNR, State Natural Areas Biologist
Laurie Osterndorf, WDNR, Administrator, Land Division
Paul Pingrey, WDNR, Forest Certification Coordinator
Randy Stampfl, WDNR, Forester
Aaron Young, WDNR, Forestry Supervisor
Teague Prichard, WDNR, Forestry
Andrew Komassa, Weekly Timber-Pulp, Inc., Forester
Kathryn Fernholz, Auditor
Gary Zimmer, Auditor
Mike Ferrucci, Auditor
Robert Hrubes, Auditor
JoAnn Hanowski, Auditor
Bernie Hubbard, Auditor

Day 2 (Sept. 16)

Mid WI Team

George W. Mead Wildlife Area

- reviewed 28-acre aspen clearcut with retention and 2 acres of hardwood thinning
- reviewed 32-acre aspen clearcut with retention
- observed past hardwood thinning site

Participants:

Matt Slater, WDNR, Forester
Brian Peters, WDNR, Wildlife Technician
Shirley Bargander, WDNR, Forestry Team Leader
Arvid Haugen, WDNR, Regional Forestry Leader
Thomas Meier, WDNR, Mead Property Supervisor
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Teague Prichard, WDNR, Forestry
Mike Ferrucci, Lead Auditor
Gary Zimmer, Auditor

Rib Mountain State Park
- reviewed Master Plan and planning process
- reviewed state park facilities and lease site (cell tower)

Participants:
Bill Smith, WDNR, Northern Region Land Leader
Arvid Haugen, WDNR, West Central Region Forestry Leader
Shirley Bargander, WDNR, Wausau Forestry Team Leader
William Bursaw, WDNR, Rib Mountain State Park Property Manager
Teague Prichard, WDNR, Forestry
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Mike Ferrucci, Lead Auditor
Gary Zimmer, Auditor
Kathryn Fernholz, Auditor

Plover River Fishery Area
- Meeting with staff regarding management and planning
- site visit to review 73 acre sale (45 acres of aspen regeneration, 28 acres of hardwoods)

Ackley Wildlife Area
- review of aspen treatments to support grassland management and waterfowl habitat

Participants:
Chad Keranen, WDNR, Marathon County Forest Liaison
Tom Meronek, WDNR, Fish Biologist/Property Manager
Tom Duke, WDNR, Forestry Staff Supervisor
Eric Bouchert, WDNR, Wildlife Technician
Ted AveLallemant, WDNR, Forester
Mike Lietz, WDNR, Forestry Team Leader
Chuck McCullogh, WDNR, Wildlife Area Supervisor
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Rick Weide, WDNR Wildlife Biologist

East WI Team
Southern Unit of the Kettle Moraine State Forest
Lulu Lake Natural Area
Rome Pond Wildlife Area

Participants:
Brian Glenzinski, WDNR, Wildlife Biologist
Michael Sierger, WDNR, Forester
Jeff Prey, WDNR, State Parks-Madison
Matt Zine, WDNR, Natural Areas Program
Paul Pingrey, WDNR, Forest Certification Coordinator
Paul Sandgren,WDNR, Forest Superintendent
Joe Lennart, WDNR, LTE Forester

Owen Boyle, WDNR, Endangered Resources Ecologist
Frank Trcka, WDNR, Southeast Region Land Leader
Jeff Weatherly, WDNR, Southeast Region Forestry Leader

Northern Unit of Kettle Moraine State Forest - active timber harvest 5 mi. east of Kewaskum.

Participants:
Tim Beyer, WDNR, Senior Forester
Dan Weidert, WDNR, Wildlife Biologist
Jason Quant, WDNR, Assistant Superintendent

Day 3 (Sept. 17)

Mid WI Team
Pershing Wildlife Area

Participants:
Mark Schmidt, WDNR, Property Manager
Terry Tappon, WDNR, Forester
Tom Duke, WDNR, Regional Forestry Staff Supervisor
Pete Wisdom, WDNR, Forestry Team Leader
Kate Fitzgerald,
Gary Zimmer, Auditor

Jump River Fishery Area

Participants:
Mark Schmidt, WDNR, Wildlife Manager/Property Manager
Terry Tappon, WDNR, Forester
Tom Duke, WDNR, Regional Forestry Staff Supervisor
Pete Wisdom, WDNR, Forestry Team Leader
Jeff Scheirer, WDNR, Fishery Biologist/Property Manager
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Gary Zimmer, Auditor

Bearskin State Trail

Participants:
Tom Duke, WDNR, Forestry Staff Supervisor
Tim Friedrich, WDNR, Team Leader Forestry
Ron Eckstein, WDNR, Wildlife Manager
John Gillen, WDNR, Forester Ranger
John Brandenburg, WDNR, Property Manager
Chuck McCullough, WDNR, Wildlife Team Leader
Tim Miller, WDNR, Regional Parks & Recreation Supervisor
Kate Fitzgerald, WDNR, Chief, Land Management and Planning

Gary Zimmer, Auditor

Woodboro Lakes Wildlife Area

Participants:
Tom Duke, WDNR, Forestry Staff Supervisor
Tim Friedrich, WDNR, Team Leader Forestry
Ron Eckstein, WDNR, Wildlife Manager
John Gillen, WDNR, Forester Ranger
Chuck McCullough, WDNR, Wildlife Team Leader
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Gary Zimmer, Auditor

Flambeau River State Forest
- review of road system, stops to review stream crossing, timber stand improvement, hardwood and pine plantation thinning, spruce thinning, and hardwood thinning

Participants:
Carmen Wagner, WDNR, Forest Hydrologist
Mike Luedeke, WDNR, Regional Forester
Larry Glodoski, WDNR, Area Forester
Teague Princhard, WDNR, Forestry, State Forest Coordinator
Heidi Brunkow, WDNR, Forester
Jim Halvorson, WDNR, Superintendent/Forester
Mike Ferrucci, Lead Auditor
Kathryn Fernholz, Auditor

Willow Flowage Scenic Waters Area
- review of master plan and timber harvest plans, visit to recent aspen thinning with management goal of transition to pine cover type

Participants:
Carmen Wagner, WDNR, Forest Hydrologist
Mike Luedeke, WDNR, Regional Forester
Teague Princhard, WDNR, Forestry, State Forest Coordinator
Kelly Moermond, WDNR, Law Enforcement Ranger
Steve Petersen, WDNR, Superintendent
Paul DeLong, WDNR, State Forester
Tom Duke, WDNR, Forestry Staff Supervisor
Jeff Olsen, WDNR, Northern Highlands American Legion State Forest Team Supervisor
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Mike Ferrucci, Lead Auditor
Kathryn Fernholz, Auditor
Gary Zimmer, Auditor
Tom Shockley, WDNR, Property Manager

East WI Team
Mud Lake Wildlife Area

Participants:
Aaron Buchholz, WDNR, Wildlife
Joe Henry, WDNR, Endangered Resources
Curt Wilson, WDNR, Regional Forester
Chris Plzak, WDNR, Door County Forester
Paul Pingrey, WDNR, Forest Certification Coordinator-Madison
Jeff Prey, WDNR, State Parks-Madison
Jean Romback-Bartels, WDNR, Northeast Region Land Leader

Whitefish Dunes State Park

Participants:
Carolyn Rock, WDNR, Educator
Tony Knipfer, WDNR, Ranger
Rich Ostrowski, WDNR, Manager

Potawatomi State Park

Participants:
Don McKinnon, WDNR, Park Superintendent

Red Banks Wildlife Area

Participants:
Aaron Buchholz, WDNR, Wildlife

Day 4 (Sept 18)

Mid WI Team
Northern Highlands – American Legion (NHAL) State Forest
- review of jack pine planting and regeneration site, review of the Raven sale and recreational uses in area of hardwood thinning

Participants:
Jim Wetterau, WDNR, NHAL Forester
Paul Schultz, WDNR, NHAL Forester
Kate Fitzgerald, WDNR, WDNR, Chief, Land Management and Planning
Todd Anderson, WDNR, NHAL Forester
Cal Doering, WDNR, NHAL Forester
Brett Bockhop, WDNR, NHAL Law Enforcement
Teague Prichard, WDNR, Forestry
Tim Friedrich, WDNR, Forestry
Tom Duke, WDNR, Regional Staff Supervisor

Craig Dalton, WDNR, NHAL Forester
Ron Eckstein, DNR, Wildlife Biologist
Steve Petersen, WDNR, Superintendent
Kelly O'Neil, WDNR, NHAL Forester
Gary Zimmer, Auditor
Kathryn Fernholz, Auditor

Bolger Lake (Scattered Forest Lands)
- review of wildlife area and oak regeneration treatments and recreational uses, review of Highway 47 right-of-way sale including aspen cut and hardwood thinning

Participants:
Jim Wetterau, WDNR, NHAL Forester
Paul Schultz, WDNR, NHAL Forester
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Todd Anderson, WDNR, NHAL Forester
Cal Doering, WDNR, NHAL Forester
Brett Bockhop, WDNR, NHAL Law Enforcement
Teague Prichard, WDNR, Forestry
Tim Friedrich, WDNR, Forestry
Tom Duke, WDNR, Regional Staff Supervisor
Craig Dalton, WDNR, NHAL Forester
Ron Eckstein, WDNR, Wildlife Biologist
Steve Petersen, WDNR, Superintendent
Kelly O'Neil, WDNR, NHAL Forester
Gary Zimmer, Auditor
Kathryn Fernholz, Auditor

East WI Team

LaSage WA - a unit of the Lower Wolf River Bottomlands Natural Resource Area

Participants:
Frank Kirchling, WDNR, Forester
Kay Brockman-Mederas, WDNR, Wildlife Biologist
James Robaidek, WDNR, Wildlife Tech
Tom Nigus, WDNR, Area Wildlife Superintendent
Ron Jones, WDNR, Forestry, Area Supervisor
Kendall Kempke, WDNR, Fisheries Biologist

Hartman Creek State Park

Participants:
Michael Bergum, WDNR, Superintendent
Steve Hoffman, WDNR, Wildlife Biologist
Mike Schuessler, WDNR, Forester
Buzz Vahradian, WDNR, Forestry Supervisor

Day 5 (Sept. 19)
Exit meeting in at WDNR Offices in Madison

Participants:
Paul DeLong, WDNR, State Forester
Paul Pingrey, WDNR, Forestry, Forest Certification Coordinator
Dave Birren, WDNR, Land, Forest Certification Coordinator
Teague Prichard, WDNR, State Forest Specialist
Peter Biermeier, WDNR, State Parks & Trails
Jeff Prey, WDNR, State Parks
Kate Fitzgerald, WDNR, Chief, Land Management and Planning also acting for Steve Miller, Director, Bureau of Facilities & Lands
Kristen Tomaszewski, WDNR, Forestry & Watershed Planner
Drew Feldkirchner, WDNR, Endangered Resources, Forestry Liaison
Randy Hoffman, WDNR, State Natural Areas
Jamie MacAvistor, WDNR, State Forest Master Planning, Forestry
Tom Watkins, WDNR, Planner, Bureau of Facilities & Lands
Bill VanderZouwen, WDNR, Wildlife Ecology Section Chief
Darrell Zastrow, WDNR, Director, Office of Forest Sciences
Alan Crossley, WDNR, Wildlife Public Lands Specialist
Sarah Shapiro-Hurley, WDNR, Deputy Administrator, Land Division
Laurie Ostendorf, WDNR, Administrator, Land Division
Mark Aquino, WDNR, Land Leader, South Central Region
Signe Holtz, WDNR, Endangered Resources Bureau Director
Robert Hrubes, Lead Auditor
Mike Ferrucci, Lead Auditor
JoAnn Hanowski, Auditor
Kathryn Fernholz, Auditor

3.3.5 Stakeholder Consultation

Pursuant to SCS protocols, consultations with key stakeholders were an integral component of the evaluation process. Consultation took place prior to, concurrent with, and following the field evaluation. The following were distinct purposes to the consultations:

- To solicit input from affected parties as to the strengths and weaknesses of the Wisconsin Department of Natural Resource's management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests.

Principal stakeholder groups of relevance to this evaluation were identified based upon results from the scoping evaluation, lists of stakeholders from the WDNR and previous assessments, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal

stakeholders:

- WI DNR employees, including headquarters and field and different divisions
- contractors
- lease holders
- adjacent property owners
- Pertinent Tribal members and or representatives
- Members of the Lake States-Central Hardwoods FSC Working Group/National Initiative
- FSC International
- Local and regionally-based environmental organizations and conservationists
- Local and regionally-based social interest organizations
- Forest industry groups and organizations
- Purchasers of logs harvested on WI DNR managed forestlands
- Local, State and Federal regulatory agency personnel
- User groups, such as hikers, ATV users, and others

Prior to, during, and following the site evaluation, a wide range of stakeholders from the regional area were consulted in regard to their relationship with the WI DNR, and their views on the management of the state managed lands. Stakeholders included FSC contact persons, government and non-government organizations involved in forest management, local citizens and groups, employees, contractors, and others. More than 150 stakeholders were contacted during the assessment process. Stakeholders were contacted with a notification mailing soliciting comment and/or phone contact. Comments were received via meetings and personal interviews "face-to-face", phone interviews ("Interview"), and through written responses. Stakeholders provided permission for their names to be listed in the report. Additional comments may have been received from individuals not wishing to reveal their identities.

Name	Affiliation	Consultation
John Camacho	Lakeland Area Mountain Bike Organization	Interview
Vern Everson	WDNR, Forest Resource Analyst	Interview
Fred Clark	Member, Governors Council on Forestry	Interview
Jonathan Gilbert	Great Lakes Indian Fish and Wildlife Commission	Interview
Doug Haag	WDNR, Section Chief, Real Estate Division	Interview
Randy Harding	Wisconsin ATV Association	Interview
Charlie Luthin	Natural Resource Foundation of Wisconsin	Interview
Terry Mace	WDNR, Forest Resource Analyst	Interview

Steve Miller	WDNR, Director of Facilities and Land	Interview
Paul Mueller	Lumberjack RC&D	Interview
Don Reed	Kettle Moraine Natural History Association, Southern Unit Friends Group	Interview
Rebecca Schroeder	WDNR, Section Chief, Endangered Resources	Interview
Fred Souba	NewPage Corporation	Interview
Shahla M. Werner	Sierra Club	Interview

3.3.5.1 Summary of Stakeholder Concerns and Perspectives and Responses from the Team Where Applicable

A summary of the major perspectives and concerns expressed by the stakeholders that were consulted during the course of this evaluation include:

Economic Concerns

Comment/Concern	Response
• There is a significant gap in road maintenance funding and it is impacting all of the lands, especially State Parks.	See OBS 2008.2
• Forest industry employment continues to decline and industries are being lost to foreign competition.	The audit team agrees that global market trends are relevant to the assessment of the WDNR's land management activities.
• Biomass energy developments are an area of growth.	See CAR 2008.5
• There are opportunities to re-introduce sharp-tailed grouse.	Duly noted and incorporated into this report
• The DNR does not provide timely reporting to account for grant expenditures and accomplishments.	No evidence of non-compliance was identified. Compliance with reporting requirements will continue to be monitored.
• The DNR is the catalyst for making business participation in certification possible.	Duly noted and incorporated into this report
• Potential to include trees from urban areas in	The audit team agrees

certification or recycling initiatives.	that opportunities exist to improve urban wood utilization; however, this is currently outside the scope of the assessment of WDNR lands.
• The certification process and timelines for corrective action requests need to be sensitive to the demands of the public process that public agencies must follow.	Duly noted and incorporated into this report
• Certification of state lands is important and helps Wisconsin's industry's meet customer demands.	Duly noted and incorporated into this report
• Timber revenues could provide an incentive for improved management of park properties.	Duly noted and incorporated into this report
• Need a more defined ATV policy for state lands and more efficient planning process to also address tribal use and access consistently.	The audit team will continue to monitor motorized and non-motorized recreation activities and policies.
• Plans for Black River and Flambeau need to allow for continued motorized trail use and avoid constructing trails that are over-built and create road-like riding experiences.	The audit team will continue to monitor the development of Master Plans.
• DNR lacks the resources to effectively manage and monitor its land base and has more land than they can handle.	See CAR 2008.3

Social Concerns

Comment/Concern	**Response**
• The best part of working with the DNR is the good resource people.	Duly noted and incorporated into this report
• Certification has made the Division of Forestry more open to stakeholder input and certification has been very helpful for improving communications.	Duly noted and incorporated into this report
• The forest supervisor has been very responsive [to recreational user concerns] and good to work with.	Duly noted and incorporated into this report
• The Land Division needs to consult with tribal interests in the management of their various types	See OBS 2008.9

of properties.	
• Tribes need information about what uses are allowed on the various types of Land Division properties.	See OBS 2008.9
• Need clarity on rights and permit process to harvest non-timber forest products on state forests and other DNR managed lands.	See OBS 2008.9
• DNR needs to do more land acquisition in the more populated parts of southeastern Wisconsin	Duly noted and incorporated into this report
• The DNR is responsive to [contractor] suggestions and feedback.	Duly noted and incorporated into this report
• The DNR has excellent leadership, especially the forestry leadership team that is creative, collaborative and meeting the needs of stakeholders.	Duly noted and incorporated into this report
• DNR does not utilize the cultural resource officers that are available and have expertise at each Tribe.	See OBS 2008.9
• Timber harvesting doesn't fit well with desired recreation activities and would prefer to see areas set aside without management.	See OBS 2008.3, Obs. 2008.5
• The DNR provides good opportunities for input to management decision-making, good communication and open information sharing.	Duly noted and incorporated into this report

Environmental Concerns

Comment/Concern	**Response**
• Lack of adequate management plans for state managed properties	See CAR 2008.1, CAR 2008.2
• Certification is a good thing because it raises the bar on how lands are managed and requires that plans be implemented	Duly noted and incorporated into this report
• Opposed to delisting of gray wolf and the proposed state management.	The audit team will continue to monitor the status of the gray wolf and its management in Wisconsin.
• DNR needs to continue to work on implementing plans.	See CAR 2008.2
• Carbon credit markets distract from the more important benefits that forest provide, wildlife habitat, water quality protection, and wood and paper	Duly noted and incorporated into this report

products.	
• Management on wildlife properties is inconsistent and varies depending on the local manager's interests and motivations.	See CAR 2008.3
• Concern about how forest certification applies to state lands managed for non-forest uses and if forest management will be required.	See OBS 2008.5
• Land managers need to collaborate across land types and integrate their learning and expertise across professions.	See OB 2008.5
• DNR is doing a good job looking at all land types and their focus on rare, threatened and endangered species is an area of success.	Duly noted and incorporated into this report
• Invasive species are taking over on properties that are not actively managed.	See OBS 2008.11
• Need pilot projects to demonstrate better management on park lands.	Duly noted and incorporated into this report
• DNR is unwilling or unable to reduce deer population densities to levels that are acceptable	See OBS 2008.4

3.4 Total Time Spent on Audit

The total person days spent on the evaluation was associated with a six (6) person audit team with two days of pre and post assessment work in addition to five field days and site visits for a total of 42 person days. The calculation includes time spent on pre-evaluation or other preparatory work, time spent auditing documents and records, interviewing stakeholders, and carrying out field work, but excluding travel to and from the region in which the certified forest is located.

3.5 Process of Determining Conformance

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

Corrective action requests (CAR's) are issued for every instance of non-conformance. Major

non-conformances trigger Major CAR's and minor non-conformances trigger Minor CAR's

Interpretations of Major CAR's (Preconditions), Minor CARs and Recommendations

Major CARs/Preconditions: Major non-conformances, either alone or in combination with non-conformances of other 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 prior to award of the certificate. If major CAR's arise after an operation is certified, the timeframe for correcting these non-conformances is typically shorter than for minor CAR's. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

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

Observations (OBS): These are suggestions that the audit team concludes would help the Department move even further towards exemplary status. Action on the recommendations is voluntary and does not affect the maintenance of the certificate. Recommendations/observations can be subsequently changed to CARs if performance with respect to the criterion triggering the recommendation/observation falls into non-conformance.

4.0 RESULTS OF THE EVALUATION

Table 4.1 below, contains the evaluation team's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. The table also presents the corrective action request (car) numbers related to each principle.

Table 4.1 Notable strengths and weaknesses of the forest management enterprise relative to the P&C

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/OBS #s
P1: FSC Commitment and Legal Compliance	▪ Creation of "The Sustainability Framework" as a tool to support monitoring	▪ Need to have a system of identifying any conflicts between WDNR regulations and the FSC Principles and Criteria	▪ **CAR 2008.7** ▪ **OBS 2008.10**
P2: Tenure & Use Rights & Responsibilities	▪ All legal rights associated with lands managed by the WDNR are appropriately documented ▪ WDNR provides for a full and robust array of public uses on the lands it manages.		
P3: Indigenous Peoples' Rights	▪ Consultation with tribal groups is on going, including formal, periodic meetings as well as in-formal conversations and open communications, and effective mechanisms exist to protect sites of special significance.	▪ Consultation specific to the different types of lands administered by the WDNR	▪ **OBS 2008.9**
P4: Community Relations & Workers' Rights	▪ The WDNR workforce demonstrates a high degree of commitment to their work and to the natural resources they are charged with managing in the peoples' interest. Land managers have stable relationships with contractors and employees indicate satisfaction with the work.	▪ Lack of spill kits at active harvest sites	▪ **OBS 2008.1** ▪ **OBS 2008.6** ▪ **OBS 2008.7**
P5: Benefits from the Forest	▪ WDNR has demonstrated a commitment to the long term management of state lands for diverse	▪ Completion of the biomass harvesting guidelines, including woody	▪ **CAR 2008.5**

	environmental and social benefits and economic viability. The updated Master Planning process emphasizes a long term perspective.	debris retention and recruitment standards	
P6: Environmental Impact	▪ The WDNR is doing an excellent job of evaluating environmental impacts and applying appropriate management options for various habitat types. ▪ Ecological assessments and management options are clearly identified in updated Master Plans. ▪ Wisconsin has one of the best SNA programs.	▪ Completion of Best Management Practices to address invasive species ▪ Communication of chemical pesticide training and requirements ▪ Timely entry of Natural Heritage Inventory data ▪ Risk assessments for the use of exotic/non-native species	▪ **CAR 2008.6** ▪ **CAR 2008.8** ▪ **CAR 2008.9** ▪ **OBS 2008.2** ▪ **OBS 2008.8** ▪ **OBS 2008.11**
P7: Management Plan	▪ The updated Master Plan Handbook and updated Master Plans do an excellent job of addressing the requirements of P7.	▪ Development of interim guidance on lands that lack Master Plans ▪ Continued progress on Master Plan development, implementation, and training	▪ **CAR 2008.1** ▪ **CAR 2008.2** ▪ **OBS 2008.3** ▪ **OBS 2008.5**
P8: Monitoring & Assessment	▪ A Master Plan monitoring process has been created and implementation has begun. ▪ The WISFIRS system provides excellent data collection and monitoring opportunities	▪ Expansion of the Master Plan monitoring and evaluation reporting procedures and associated training	▪ **CAR 2008.3** ▪ **OBS 2008.4**
P9: Maintenance of High Conservation Value Forest	▪ WDNR has demonstrated its commitment to identify and conserve HCV forests by conducting several comprehensive assessments and the findings have been publically reported.	▪ Application of HCVF requirements to include state properties administered by the Division of Land within the scope of	▪ **CAR 2008.4**

		the certificate	

4.2 Preconditions

Preconditions are major corrective action requests that are issued to the certification applicant after the initial evaluation and before the forest management operation is certified. Certification cannot be awarded if open preconditions exist.

No preconditions were issued to the Wisconsin Department of Natural Resources (WDNR) as a result of the re-certification evaluation.

5.0 CERTIFICATION DECISION

5.1 Certification Recommendation

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team hereby recommends that the Wisconsin Department of Natural Resources retain FSC certification as a "Well-Managed Forest" subject to the corrective action requests stated in Section 5.2. The Wisconsin Department of Natural Resources has demonstrated that their system of management is capable of ensuring that all of the requirements of the Lake States-Central Hardwoods Region (USA) Regional Forest Stewardship Standard Version 3.0 are met over the forest area covered by the scope of the evaluation. The Wisconsin Department of Natural Resources has also demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.

5.2 Initial Corrective Action Requests

Background/Justification: FSC Principle 7 requires that management of certified lands be guided by management plans that are "written, implemented and kept up to date." The WDNR has made substantial progress toward planning for the strategic development of Master Plans for state managed properties by using a well-structured 3-tiered approach. In the interim as plans are being developed, the WDNR needs to institute measures for maintaining the currency of operational components of outdated plans and/or providing operational guidance for Tier 1 and Tier 2 properties that lack a plan. These efforts should include correlating the annual work plans with the master plans or other guidance documents and addressing the management plan requirements of Principle 7.	
CAR 2008.1	By the time of the first annual audit after award of certification, WDNR must develop protocols and make substantial progress in developing key operational components of the Master Plans for state-managed properties that will not be undergoing a full re-planning within the next 5 years. Key components to develop include: management objectives for each property (by individual tract or groups), descriptions of the natural resources to be managed, the management systems to be used, and any unique considerations for the property. Updates should be made publicly available (e.g., through updates to property websites).
Deadline	2009 annual audit
Reference	*FSC Indicators 7.1.a.2, 7.2.a., 7.3.a*

Background/Justification: The WDNR has developed a plan for completing Master Plans for Tier 1 and Tier 2 properties. There is a 10-12 year timeframe for the process of developing these plans. This timeframe should be accelerated as much as possible and training efforts should be planned to accompany plan implementation.	
CAR 2008.2	The WDNR must provide an update on progress toward the Master Planning goals on an annual basis as well as the training programs for supporting plan development and implementation.
Deadline	2009 annual audit
Reference	*FSC Indicators 7.1.a.2, 7.2.a., 7.3.a*

Background/Justification: The WDNR has implemented a process for State Forest Master Plan Monitoring and Evaluation Reporting. The Master Plan monitoring process needs to be expanded to include those properties managed by the Division of Land. The expanded Master Plan monitoring and evaluation reporting process should also be supported by training or additional guidance that increases consistency in the reporting and more clearly links accomplishments with management objectives and goals.	
CAR 2008.3	By the next annual audit, Wisconsin DNR must develop and apply a property plan implementation and monitoring reporting template and instructions in order to expand the Master Plan monitoring and evaluation reporting procedures to include properties administered by the Division of Land and provide evidence of training or guidance that provide direction on how to complete the reporting in a manner that links to the management objectives and quantified progress toward goals.
Deadline	2009 annual audit
Reference	*FSC Indicator 8.1.b*

Background/Justification: The WDNR, Division of Forestry, has developed a written crosswalk between HCVF requirements found in P.9 and DNR's approach to identifying and managing areas of high conservation value. This crosswalk needs to be expanded to address state properties administered by the Division of Land that are within the scope of this certification evaluation.	
CAR 2008.4	By the time of the first annual audit, the Division of Land must update the HCVF crosswalk to include properties it administers. This expanded crosswalk must demonstrate that management of all DNR-administered properties within the scope of this certification evaluation meets the HCVF requirements set forth in Principle 9.
Deadline	2009 annual audit
Reference	*FSC Indicator 9.3.a*

Background/Justification: The WDNR has developed guidelines for biomass harvesting that include woody debris retention and recruitment standards. The guidelines were in the public review process at the time of the September 2008 assessment.

CAR 2008.5	At the time of the first annual audit, the WDNR must update SCS on the status of the implementation of the guidelines. If the guidelines are not approved and disseminated in a timely manner the WDNR will need to identify an alternative approach to address woody debris retention in the context of biomass harvesting operations on properties included in the scope of this certification evaluation.
Deadline	2009 annual audit
Reference	*FSC Indicators 5.3.a, 6.3.b, and 6.3.c*

Background/Justification: The WDNR has inconsistent guidance regarding the training and licensing requirements for chemical pesticide applicators. The FSC Lakes States Regional Standard also requires that an up-to-date list of all chemical pesticides being used on WDNR-managed properties is provided to the certification body to confirm compliance with the FSC Pesticides Policy; that is, to confirm that no chemicals on the FSC prohibited list are in use on certified properties. It is also required that land managers employ integrated pest management and other strategies that effectively minimize the use of chemical pesticides.	
CAR 2008.6	The WDNR must provide evidence of clearly communicated chemical pesticide training and licensing requirements and implement training programs, as needed. The WDNR must also provide an up-to-date complete list of chemical pesticides being used on properties within the scope of the certification evaluation. The WDNR must provide evidence of an integrated pest management policy or other strategies that result in the reduction, avoidance, and minimization of chemical pesticide use.
Deadline	2009 annual audit
Reference	*FSC Indicator 6.6.b*

Background/Justification: The FSC Lake States Regional Standard requires that when conflicts between legal mandates and conformance with the FSC Principles and Criteria occur that such conflicts are referred to the appropriate FSC body for guidance and resolution. To comply with this requirement it is necessary that responsible parties including field staff have sufficient familiarity with the FSC standard to be able to recognize potential conflicts and that guidance is provided regarding reporting mechanisms. Certification training should be provided to staff consistent with their roles and may include the use of information tools, handbook revisions and other delivery mechanisms or approaches.	
CAR 2008.7	The written commitment must be conveyed to SCS that WDNR will bring any conflicts between applicable laws/regulations and the FSC certification standard to the attention of FSC/SCS. This commitment must be supported by actions aimed at improving relevant DNR employees' familiarity with the FSC Lake States Regional Standard including providing ready access to the full standard.
Deadline	2009 annual audit
Reference	*FSC Indicator 1.4.a*

Background/Justification: The FSC Lake States Regional Standard requires the protection of threatened, endangered, of special concern, or sensitive species and their habitats. A key step to complying with this requirement is the use of a robust Natural Heritage Inventory (NHI) database that is inclusive and kept up to date. The WDNR must ensure that land managers are provided the most current NHI data possible and that where a backlog in data entry occurs land managers must still be able to access records of occurrences and/or expert advice. To the extent practical, staff and resources should be reallocated to address the data entry backlog. The WDNR must also ensure that all recorded occurrences (including those not yet entered in the database) are included in Master Plan development and operational planning.	
CAR 2008.8	By the time of the first annual audit, the WDNR must provide a report on the status of the data entry backlog, efforts that are underway to address the backlog (including collaborations with stakeholders), and evidence of guidance that addresses the procedures land managers must use to access the most current records and information and details for how this procedure is used for Master Plan development and operational planning.
Deadline	2009 annual audit
Reference	*FSC Indicator 6.2.e.*

Background/Justification: The FSC Lake States Regional Standard requires that the use of exotic/non-native species be informed by a risk assessment conducted prior to their use.	
CAR 2008.9	The WDNR must demonstrate that risk assessments for the use of exotic/non-native species (such as in seed mixes for erosion control and other management applications) are completed prior to such use.
Deadline	2009 annual audit
Reference	*FSC Indicator 6.9.b*

Observation 2008.1: Field visits during the September 2008 evaluation resulted in observed instances of contractors having first aid kits and spill kits kept in vehicles at the landing and not at the active harvest site. Training should emphasize the importance of health and safety materials being kept in multiple locations and/or with the operators and equipment.

Observation 2008.2: The WDNR has made significant efforts to ensure that road, trail and other transportation systems on state managed lands are designed to required standards. However, this level of performance cannot be maintained without adequate and reliable dedicated funding and staff. There is currently no secure funding source for road maintenance, leading to auditor concerns about the frequency of road maintenance treatments (such as grading) and BMP compliance.

Observation 2008 3: The WDNR is instituting a plan for developing Master Plans for state managed lands. To support the timely, consistent and constructive development and implementation of Master Plans, the WDNR may want to engage in a process to promote the benefits of Master Plans to field personnel. The communication efforts could also help identify and address any field-level questions or concerns about the plans and planning process.

Observation 2008.4: The State of Wisconsin has made significant efforts to monitor the deer population in the state, set population goals, and manage deer in a manner that supports multiple land management objectives. The WDNR has tried a variety of hunting season structures and regulations in an effort to bring deer populations closer to desired levels. Deer levels vary throughout Wisconsin; in general populations are somewhat above target but generally not significantly so. Negative impacts to desirable advanced regeneration from deer browse were observed in many forests, particularly in east-central Wisconsin. Ongoing efforts to set and achieve deer population targets at which forest components and diversity can be sustained should be encouraged. Continuing attention is warranted.

Observation 2008.5: There are opportunities for better understanding on the part of some Forestry Division field foresters of Division of Land management objectives for state parks, wildlife areas, and other properties administered by the Land Division so that stand management prescriptions designed for these categories of properties will better contribute to management objectives, objectives that typically do not include sustained yield timber production.

Observation 2008.6: Recognizing that the WDNR does not regulate workers compensation insurance rates and that the agency did testify in support of rate changes, logging and roading contractors have expressed concerns about current workers compensation insurance rates and the lack of distinction between hand-felling and mechanized operations. These stakeholders concerns and the status of any legislative actions will continue to be monitored.

Observation 2008.7: Concerns have been raised by some DNR field personnel regarding the potential use of contract foresters for land management activities on State Forests, a strategy that is being considered in response to the mandate for WDNR to meet timber production goals. The administrative rule that sets up forester contracting includes contractor training requirements and safeguards on contractor performance. Property managers are phasing in contracting trials to assure the concept works as intended. The results of these trials could be monitored and a report prepared to summarize the findings and provide recommendations.

Observation 2008.8: Field personnel were found to have a lack of familiarity with the rutting guidelines and thresholds. While it was confirmed that the guidelines are included in the contracts and as such, are readily available, there is nonetheless an opportunity to improve the working knowledge of the guidelines with foresters who are overseeing logging operations.

Observation 2008.9: There are opportunities for the Division of Land to enhance tribal stakeholder consultation related to land management activities and impacts on traditional uses and customary rights. The consultation could include a specific request for land management input from tribal interests and representatives. Consultation could also include providing information to tribal members to clarify which activities are permitted on the various land classifications and guidance for non-timber forest product gathering.

Observation 2008.10: The WDNR may find benefit in continuing to develop The Sustainability Framework as an element of its 10-year Statewide Forest Assessment. The Framework includes its own Criteria and Indicators for Sustainable Forest Management and provides an opportunity to gather valuable, readily available statewide information without additional data generation. Given the statewide scale and scope of WDNR land management the scale of the Framework assists in meeting the need for landscape scale monitoring.

Observation 2008.11: The WDNR should complete the process of developing Best Management Practices (BMPs) that address invasive species in forest management and methods for incorporating observed instances of invasive species into the inventory data. The program could include specifics on mapping/identification, removal/control, and prevention, including specifically how the major pathways of invasive species introduction will be contained/controlled.

6.0 SURVEILLANCE EVALUATIONS

If certification is awarded, surveillance evaluations will take place at least annually to monitor the status of any open corrective action requests and review the continued conformance of the Wisconsin Department of Natural Resources to the applicable FSC standard. The applicable standard is currently the Lake States-Central Hardwoods Region (USA) Regional Forest Stewardship Standard Version 3.0. The FSC-US is undergoing a standards revision process and future surveillance audits will be conducted under the applicable standard which may be different from the current standard. Public summaries of surveillance evaluations will be posted separately on the SCS website (www.scscertified.com).

7.0 SUMMARY OF SCS COMPLAINT INVESTIGATION PROCEDURE

The following is a summary of the SCS Complaint and Appeal Investigation Procedures; the full versions of the procedures are available from SCS upon request. The SCS Complaint and Appeal Investigation Procedures are designed for and available to any individual or organization that perceives a stake in the affairs of the SCS Forest Conservation Program and that/who has reason to question either the actions of SCS itself or the actions of a SCS certificate holder.

A **complaint** is a written expression of dissatisfaction, other than **appeal**, by any person or organization, to a certification body, relating to the activities of staff of the SCS Forest Conservation Program and/or representatives of a company or entity holding either a forest management (FM) or chain-of-custody (CoC) certificate issued by SCS and duly endorsed by FSC, where a response is expected (ISO/IEC 17011:2004 (E)). The SCS Complaint Investigation Procedure functions as a first-stage mechanism for resolving complaints and avoiding the need to involve FSC.

An "**appeal"** is a request by a certificate holder or a certification applicant for formal reconsideration of any adverse decision made by the certification body related to its desired certification status. A certificate holder or applicant may formally lodge an appeal with SCS against any adverse certification decision taken by SCS, within thirty (30) days after notification of the decision.

The written Complaint or Appeal must:

- Identify and provide contact information for the complainant or appellant
- Clearly identify the basis of the aggrieved action (date, place, nature of action) and which parties or individuals are associated with the action
- Explain how the action is alleged to violate an SCS or FSC requirement, being as specific as possible with respect to the applicable SCS or FSC requirement
- In the case of complaints against the actions of a certificate holder, rather than SCS itself, the complainant must also describe efforts taken to resolve the matter directly with the certificate holder
- Propose what actions would, in the opinion of the complainant or appellant, rectify the matter.

Written complaints and appeals should be submitted to:

Dr. Robert J. Hrubes, Senior Vice-President
Scientific Certification Systems
2200 Powell Street, Suite 725
Emeryville, California, USA94608
Email: rhrubes@scscertified.com

As detailed in the *SCS-FCP Certification Manual*, investigation of the complaint or appeal will be confidentially conducted in a timely manner. As appropriate, corrective and preventive action and resolution of any deficiencies found in products or services shall be taken and documented.

SECTION B DETAILED RESULTS OF THE FULL EVALUATION

1.0 DETAILED EVALUATION OF CONFORMANCE

The findings and observations of the evaluation team are presented in this section, structured according to the 9 applicable FSC Principles. To follow are brief descriptions of each Principle, Criterion, and Indicator and the team's findings and judgments at the Criterion and Indicator level.

1.1 PRINCIPLE #1: COMPLIANCE WITH LAWS & 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.

This FSC Principle is elaborated through a set of 6 Criteria that focus on issues such as conformance to all applicable national and local laws and regulations, payment of legally prescribed fees, taxes and royalties, protections against illegal harvesting and other unauthorized activities, and demonstrating a long-term commitment to adhere to the FSC Principles & Criteria.

Standard	**C/NC**	**Comments/CAR**
C1.1 Forest management shall respect all national and local laws and administrative requirements.	**C**	
1.1.a. Forest management plans and operations comply with applicable Federal, state, county, tribal, and municipal laws, rules, and regulations.	C	Ceded territory rights are addressed in the Master Planning Handbook
1.1.b. Forest management plans and operations comply with state Best Management Practices (BMPs) (see Appendix for references) and other government forest management guidelines applicable to the forest, both voluntary and regulatory (see also Criterion 6.5)	C	Field observations confirmed BMP compliance , confirmed water permitting processes followed
1.1.c. Forest management plans and operations meet or exceed all applicable laws and administrative requirements with respect to sharing public information, opening records to the public, and following procedures for public participation.	C	Extensive online sharing of information and availability of management records. Public meetings and guidelines for public engagement in the handbooks. See CAR 2008.4
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	**C**	
1.2.a. Taxes on forest land and timber, as well as other fees related to forest management, are paid in a timely manner and in accordance with state and local laws.	C	As a state agency, matters related to taxes are largely not applicable. There is no evidence to suggest that DNR does not make timely payment of applicable fees and charges.
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	**C**	
1.3.a. Forest management operations comply with all	C	Confirmed awareness of applicable treaties and

binding treaties or other agreements to which the U.S. is a party, including treaties with American Indian tribes.		ongoing efforts to comply with settlement regarding on-going consultation. DNR believes that they are in compliance with all applicable international agreements. However, this conclusion is not based upon an explicit assessment. The auditors consider highly likely that there is no likely instances of noncompliance but an explicit assessment conducted by DNR would help to confirm this. See Observation 2008.*
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.	**C**	
1.4.a. Where conflicts between laws and FSC Principles and Criteria occur, they are referred to the appropriate FSC body.	C	DNR leadership have orally assured the SCS lead auditor that any such conflicts will be brought to the attention of SCS and/or FSC. However, a written statement of commitment will provide added assurance. As well, DNR Land Division staff, in the field and in the central office, does not have a working familiarity with the FSC Lake States Regional Standard. Without a working familiarity, DNR is less likely to avoid nonconformities and to be aware of any conflicts may arise. **See CAR 2008.9**
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	**C**	
1.5.a. Forest owners or managers implement measures to prevent illegal and unauthorized activities in the forest.	C	Observances of gates, berms, road closures and other techniques including posted signs indicating allowed uses.
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	**C**	
1.6.a. Forest owners or managers provide written statements of commitment to the FSC Principles and Criteria. The commitment is stated in the management plan [see 7.1], a document prepared for the certification process, or another official document.	NC	Commitments to FSC have been maintained through the 5-year life of the certificate. See CAR 2008.*
1.6.b Forest owners or managers document the reasons for seeking partial certification.	NA	The WDNR is pursuing certification for all state managed lands except for approximately 30,000 acres of agricultural, eased lands outside of DNR management and non-forest lands uses that have been described.
1.6.c Forest owners or managers document strategies and silvicultural treatments for several harvest entries that meet the FSC Principles and Criteria (see Principle 7).	C	Several harvest entries and diverse silviculture treatments were reviewed and documentation provides to demonstrate compliance with the standard. The Silviculture Handbook establishes re-entry cycles for the silvicultural regimes employed on state property. Foresters mark stands for harvest

		with explicit consideration of the time period to the next entry and the likely nature of that entry. Foresters clearly approach stand treatments with a long term perspective. Harvest planning includes long-term considerations such as future stand objectives

1. 2 PRINCIPLE #2: TENURE AND USE RIGHTS/RESPONSIBILITIES

Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.

This FSC Principle, detailed through 3 Criteria, focuses on the long-term tenure and use rights to the land that is undergoing the certification evaluation. Forest managers seeking FSC-endorsed certification must establish clear and legal ownership or right to manage the defined forest area that is being evaluated. Customary use rights, if clearly demonstrated, must be appropriately honored.

Standard	**C/NC**	**Comments/CAR**
C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	**C**	
2.1.a. Forest owners or managers document the legal and customary rights associated with the forest. These rights include both those held by the party seeking certification and those held by other parties.	C	All legal rights associated with lands managed by the DNR are appropriately documented
2.1.b. Affected land boundaries are clearly identified on the ground by the forest owner or manager prior to commencement of management activities.	C	Perimeters of harvest units are clearly marked in the field prior to operations. It was clear that the managers were diligent in defining property boundaries prior to any management activities.
C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.	**C**	
2.2.a. The forest owner or manager allows legal and customary rights to the extent that they are consistent with the conservation of the forest resource and the objectives stated in the management plan.	C	DNR provides for a full and robust array of public uses on the lands it manages. The properties are open to public use, however use may be restricted according to objectives in the management plan. Public use policies are driven by the objective to conserve and enhance the values and resources associated with the lands managed by the DNR
2.2.b. On ownerships where customary use rights or traditional and cultural areas/sites exist, forest owners or managers consult with concerned groups in the planning and implementation of forest management	C	Field observation indicated that this was happening in applicable areas. DNR employs an array of methods that collectively assure a substantial level of discourse and consultation with individuals and

activities.		organizations expressing an interest in the management of DNR-administered properties. Management activities on DNR-managed properties are extremely unlikely to cause adverse impacts on customary uses as well as sites of significance to Native Americans
C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	**C**	
2.3.a. The forest owner or manager maintains relations with community stakeholders to identify disputes while still in their early stages. If disputes arise, the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If negotiation fails, existing local, state, Federal, and tribal laws are employed to resolve claims of land tenure (see Glossary).	C	DNR, through an array of mechanisms such as "Friends of …" groups, maintains very active and collaborative interaction with interested individuals and organizations, thereby enhancing the likelihood of early resolution of any concerns. Property managers work very hard to maintain good relationships with community stakeholders Evidence was found of established and maintained stakeholder relations that assist in addressing and preventing disputes. Efforts include consultation before harvests occur and continued conversations as management activities are implemented.
2.3.b. The forest owner or manager provides information to the certification body regarding unresolved and/or ongoing disputes over tenure and use-rights.	C	In the unlikely event that such disputes were to arise, the auditors are fully satisfied that DNR will bring such disputes to SCS' attention. There are no current significant unresolved or ongoing disputes over tenure and use-rights.

1.3 PRINCIPLE #3: INDIGENOUS PEOPLES' RIGHTS

The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.

This FSC principle is concerned about the rights of indigenous peoples to own, use and manage their lands and territories. The Criteria focus on issues such as tenure rights of indigenous people, protection of cultural sites, and compensation for traditional knowledge.

Standard	**C/NC**	**Comments/CARs**
C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.		**This Criterion is deemed to be not applicable to the evaluation of the state lands managed by the DNR.**
3.1.a. On tribal lands, forest management and planning includes a process for input by tribal members in	NA	

accordance with their laws and customs.		
3.1.b. Forest management on tribal lands is delegated or implemented by an authorized tribal governing body.	NA	
C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	**C**	
3.2.a. Forest owners or managers identify and contact American Indian groups that have customary use rights or other legal rights to the management area and invite their participation in the forest planning processes, appropriate to the scale and intensity of the operation. (see also Criterion 4.4.)	C	The WDNR maintains ongoing consultation with Tribal groups and organizations in relation to management activities. Consultation includes the requirements of the settlement associated with the Voight case as well as other interested parties and groups.
3.2.b. Steps are taken during the forest management planning process and implementation to protect tribal resources that may be directly affected by certified operations such as adjacent lands, bodies of water, critical habitats, and riparian corridors as well as other resource uses such as rights to hunt, fish, or gather.	C	Collectively, management planning and project implementation on DNR-managed properties assures a high degree of assurance that adverse impacts to tribal resources and sites will be avoided. The State Archaeologist is active in identifying cultural resources, training land mangers in their identification, and advising on the appropriate protections. Land mangers demonstrated a working knowledge of resources and their identification and an understanding of the appropriate protections including consultation with the State Archaeologist. Gathering rights are being protected and used.
C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	**C**	
3.3.a. Forest owners or managers make systematic efforts to identify areas of cultural, historical, and/or religious significance. They invite participation of tribal representatives (or other appropriate persons, where tribal entities are lacking) in the identification of current or traditionally significant sites within the forest proposed for certification.	C	This is one of the factors considered in the inventory of properties and looked at again when prescriptions are being implemented. While there is some variability across individual property managers, the strong impression formed by the audit team is that DNR field personnel are sensitive to the possible presence of cultural, historical and/or religious sites of significance to Native Americans.
3.3.b. Forest owners and managers consult with tribal leaders (or other appropriate persons, where tribal entities are lacking) to develop mechanisms that ensure forest management operations protect from damage or interference those areas described in 3.3.a. and incorporate these special places into forest management and operational plans.	C	Consultation with tribal groups is on-going, including formal, periodic meetings as well as in-formal conversations and open communications, and effective mechanisms exist to protect sites of special significance
3.3.c. Confidentiality of disclosures is maintained in keeping with applicable laws and the requirements of tribal representatives.	C	DNR complies with all applicable requirements for maintaining confidentiality of cultural sites of significance to Native Americans.
C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	**NA**	**There is no evidence to suggest that this Criterion is relevant/applicable to DNR's management of the state properties.**

3.4.a. Forest owners or managers respect the confidentiality of tribal knowledge and assist in the protection of tribal intellectual property rights.	NA	No instances of non-compliance were identified.
3.4.b. A written agreement is reached with individual American Indians and/or tribes prior to commercialization of their indigenous intellectual property, traditional knowledge, and/or forest resources. The individuals and/or tribes are compensated when such commercialization takes place.	NA	No instances of applicability were identified.

1.4 PRINCIPLE #4: COMMUNITY RELATIONS & WORKERS' RIGHTS

Forest management operations shall maintain or enhance the long-term social and economic well being of forest workers and local communities.

This FSC Principle, elaborated through 5 Criteria, addresses the effects of forest management on the well being of forest workers and local communities. The Criteria focus on issues such as: preferences for local employment, compliance with employee health and safety regulations, rights of workers to organize, completion of social impact assessments, and employee grievance resolution mechanisms. In short, this principle expresses the position that exemplary forest management must include a conscious sensitivity to the interests of the most directly impacted stakeholders: employees, contractors and local communities.

Standard	**C/NC**	**Comments/CARs**
C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	**C**	
4.1.a. Opportunities for employment, contracting, procurement, processing, and training are as good for non-local service providers as they are for local service providers doing similar work.	C	Employment opportunities at DNR are non-discriminatory, including with respect to place of residence; while most DNR employees were schooled in Wisconsin, there are many employees with origins and training in other states. Contractors are obligated to provide equal protection for all employees regardless of whether they are local or non-local. Service providers indicated satisfaction with work conditions and local and non-local conditions are similar.
4.1.b. Forest work is packaged and offered in ways that create quality work opportunities for employees, contractors, and their workers.	C	Despite the longstanding and ongoing budgetary challenges that have resulted in a smaller DNR workforce over the years, those jobs that remain are quality positions with competitive compensation and benefits. The workforce demonstrates a high degree of commitment to their work and to the natural resources that are charged with managing in the peoples' interest. Land managers have stable

		relationships with contractors and employees indicate satisfaction with the work. There is some concern about the stability and turnover within Limited Term Employee (LTE) positions but opportunities for advancement were also recognized.
4.1.c. Forest owners or managers contribute to public education about forestry practices.	C	The WNDR supports a large number and wide range of environmental education activities, including activities at Land Division properties such as State Parks. Many state park units employ public education specialists.
4.1.d. Forest owners or managers participate and invest in the local economy and civic activities.	C	DNR employees reside in small, mid-sized and large communities throughout Wisconsin and the workforce is engaged in civic activities throughout the state both as private citizens in off hours and as DNR representatives during work hours
4.1.e. Employee compensation and hiring practices meet or exceed the prevailing local norms for work within the forest industry that requires equivalent education, skills, and experience.	C	DNR compensation and benefit packages are competitive with other employers, public and private, that employ natural resource professional and technicians The WDNR is aware of prevailing wages and recent adjustments were made to be more competitive with regional norms.
4.1.f. Forest owners or managers assure that contractors, subcontractors, intermediaries, and persons hired by them are covered and protected by all state and Federal labor laws regarding discrimination, wages, benefits, and other conditions of employment.	C	DNR contracts explicitly require that contractors comply with all applicable labor and worker safety laws. Applicable laws are referenced in contracts and employee handbooks and other documents.
C4.2. 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 and their contractors develop and implement safety programs and procedures.	C	Safety considerations and policies are an express element of contracts. The loggers working on visited sites were knowledgeable and had suitable safety equipment in the immediate vicinity. Safety is a formal element in the DNR's field operations.
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 Labour Organization (ILO).	**C**	
4.3.a. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.	C	Freedom of association is unambiguously guaranteed for all DNR employees. For all employees of contractors, the DNR standard contract requires the contractor to comply with all applicable labor laws; as such, freedom of association is assured.
4.3.b. Forest owners or managers and their contractors develop effective and culturally sensitive mechanisms to resolve disputes between workers and management.	C	DNR has a highly developed dispute resolution mechanism for its employees, both union and non-union employees
4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.	**C**	
4.4.a. On lands with multiple owners, a process is provided that assures the opportunity for fair and	NA	

reasonable input from the landowners and/or shareholders.		
4.4.b. Input is sought in identifying significant sites of archeological, cultural, historical, or community importance, that are to be designated as special management zones or otherwise protected during operations.	C	DNR field staff adheres to protocols that entail consultation with the state archeologist. This was evident on many of the properties visited. Special sites such as archeological, cultural and historic sites are effectively and consistently protected with special management designations. Site disturbing land management actions are modified or foregone, as necessary, to avoid adverse impacts to archeological, cultural and historic sites.
4.4.c. Viewpoints and feedback are solicited from people and groups directly affected by forest management operations and its associated environmental and aesthetic effects (e.g., logging, burning, spraying, and traffic). Significant concerns are addressed in management policies and plans.	C	DNR engages in a full and robust array of both formal and informal stakeholder interactions, dialogue and consultation. All property managers are actively involved in keeping the public informed and work well with "friends" groups. In the judgment of the audit team, DNR policies and practices are highly responsive to the desires and expectations of the citizens of Wisconsin.
4.4.d. Forest owners or managers of large and mid-sized (see Glossary) forests provide opportunities for people directly affected by management operations to provide input into management planning.	C	Management planning, at both the strategic and tactical levels, incorporates ample opportunities for citizens to provide input.
4.4.e. For public forests, consultation will include the following components:	C	The following components were all confirmed to be included in management planning considerations.
1. Legislative and historical mandates are included in the plan, and provisions are made for their accomplishment.	C	Statutory authorities are properly referenced in management planning documents such as Master Plans.
2. Clearly defined and accessible methods for public participation are provided in both the strategic (long-range) and tactical (short-range) planning processes, including initial adoption and subsequent amendments.	C	Opportunities and mechanisms for the public to be involved in management planning are clearly articulated and broadly understand by the citizenry. The Master Plan Handbook defines public participation requirements and were observed to be followed on properties with Master Plans.
3. Public notification is sufficient to allow interested citizens of the affected jurisdiction and/or other people and groups directly affected by management operations the chance to learn of upcoming opportunities for public review and/or comment on the proposed management.	C	Public notifications of planning activities and of public comment opportunities are robust and included in the Master Planning process.
4. The final planning decisions are based on legal mandate, public input, credible scientific analysis, and the productive capacity of the land and are made by professional employees, hired by the public, or other legally authorized parties.	C	Final planning decisions, such as finalization of Master Plans, are clearly taken pursuant to statutory authorization and they involve extensive public input as well as in-depth analysis. Land management planning and operational management decisions are undertaken by a large and diverse staff of professional employees who collectively are acting in the public interest.
5. An accessible and affordable appeals process to planning decisions is available.	C	As a state agency subject to a state administrative procedures act, there is an appeal process that is available.

C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of Clocal peoples. Measures shall be taken to avoid such loss or damage.	**C**	
4.5.a. The forest owner or manager attempts to resolve grievances and mitigate damage resulting from forest management activities through open communication and negotiation prior to legal action.	C	DNR field personnel have a long tradition of maintaining open dialogue with a wide array of interest groups as well as individuals. It is our strong sense that DNR employees seek to resolve any issues that may arise through open communication and that litigation is pursued or resorted only in extremely rare circumstances. Field observation indicated this occurs frequently especially in property line discussions.
4.5.b. Forest owners or managers and their contractors have adequate liability insurance.	C	DNR contract terms require contractors to have liability insurance

1.5 PRINCIPLE #5: BENEFITS FROM THE FOREST

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.

This FSC Principle addresses several loosely related issues such as efficiency in the use of forest products, financial viability of the forest management operation, and diversity of environmental and social benefits from forest management. Principle 5 is elaborated through 6 Criteria. Of note, Criterion 5.6 requires that the rate of harvest not exceed levels that can be permanently sustained, perhaps one of the most focused and specific requirements found throughout the P&C. The other 5 Criteria within this principle address matters such as balancing financial objectives with full cost accounting (including environmental costs), optimal use of harvested products and local processing, minimization of waste and residual stand damage, diversification of products from the forest, and protection of forest services such as watershed functions and fisheries values.

Standard	**C/NC**	**Comments/CARs**
C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	**C**	
5.1.a. The forest owner or manager is willing and able to support long-term forest management (i.e., decades rather than quarter-years or years), such as planning, inventory, resource protection, and post-harvest management activities.	C	DNR committed to long term management of state lands. Updated Master Planning process emphasizes long term perspective. This is well addressed as a public land manager.
5.1.b. Responses (such as increases in harvests or debt	C	Where there are written plans the managers make

load) to short-term financial factors (such as market fluctuations and sawmill supply requirements) are limited to levels that enable fulfillment of the management plan.		every effort to work within the plan and ask for a variance if there is a need to deviate from the plan.
5.1.c. Investment and/or reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity.	C	The current high deer population makes it difficult to attain adequate regeneration of some stands.
C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	**C**	
5.2.a. Opportunities are given to local, financially competitive, value-added processing and manufacturing facilities.	C	Yes
5.2.b. When non-timber products are harvested, the management and use of those products is incorporated into the management plan.	C	Yes
5.2.c. New markets are explored for products from common but underutilized forest species.	C	This appears to be left up to the logger to decide where the products will be marketed but the pricing structure helps ensure that products will be directed to the highest use.
C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	**C**	
5.3.a. Adequate quantities and a diversity of size classes of woody debris (considered a reinvestment of biological capital under this criterion—not an economic waste) are left on the forest floor to maintain ecosystem functions, wildlife habitats, and future forest productivity.	C	This will be covered in new policy that is under development stating how much and what needs to be left depending on site and soil conditions. **See CAR 2008.7**
5.3.b. The loss and/or waste of merchantable forest products is minimized.	C	Utilization standards in contracts and as observed in the field were appropriate to minimize waste.
5.3.c. Harvest practices minimize residual stand damage.	C	On the sites visited harvest damage was minimal and contract specifications outlined the penalties for excessive residual damage, however excessive is not very well described.
C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	**C**	
5.4.a. Forest management diversifies forest uses and products, while maintaining forest composition, structures, and functions.	C	Good evidence that this is occurring across the landscape.
C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	**C**	
C5.6. The rate of harvest of forest products shall not exceed levels that can be permanently sustained.	**C**	
5.6.a. The sustainability of harvest levels is based on growth and regeneration data, site index models, soil classification, and/or desired future conditions. The required level of documentation is determined by the scale and intensity of the operation.	C	Harvest levels on the sites visited do not exceed levels that can be permanently sustained.
5.6.b. After the species composition and the age-class (see Glossary) distribution commensurate with long-term	C	These properties have not been intensively managed for forest products for many years and in many cases

sustainability have been achieved, harvest and growth records demonstrate that the volume harvested during any 10-year span is less than the net growth accumulated over that same period. Exceptions to this constraint may be granted to forest owners or managers whose periodic cycle of re-entry is longer than 10 years. In such cases, allowable harvest is determined by examining the volume of re-growth and removal since the previous harvest and the forest owner or manager's commitment to allow an equivalent amount of re-growth before additional harvests.		this will be the first entry since the forest was established by natural or artificial means.
5.6.c. If rates of harvest are temporarily accelerated to compensate for or prevent unacceptable mortality, or in cases of salvage operations (see Indicator 6.3.c.4), the rate of future harvest is recalculated accordingly to meet desired future conditions, and the adjusted rate of harvest is implemented within three years of the temporary acceleration.	C	No evidence of inappropriate harvest accelerations or aggressive salvage was found.

1.6 PRINCIPLE #6: ENVIRONMENTAL IMPACT

Forest Management shall conserve biological diversity and its associated values, water resources, souls, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest

This FSC Principle is elaborated by a set of 10 Criteria that focus on issues such as impact assessments, protection of listed species, biodiversity, reserve areas, streamside and wetlands buffers, erosion control, exotic species, chemical use, high conservation value forests, and forest conversions. Of all the FSC Principles, this one is the most expansive in scope, with an associated high level of emphasis on data and information collection and analysis. Collectively, the thrust of this principle encourages the maintenance and restoration of natural forest conditions.

Standard	**C/NC**	**Comments/CARs**
C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	**C**	
6.1.a. Using credible scientific analyses and local expertise, an assessment of current conditions is completed to include:	C	Managers do an excellent job of assessing all of the affected resources. DNR has information or created data layers that allow them to assess current condition

• Disturbance regimes and successional pathways; • Unique, vulnerable, rare, and threatened communities; • Common plants, animals, and their habitats; • Sensitive, threatened, and endangered species and their habitats; • Water resources; and • Soil resources (see also Indicators 7.1.a and b).		of managed properties. This information is located in a variety of locations/documents. As an example, the planning handbook indicates that "Maintaining or improving biological diversity is essential to an ecological approach. Activities that improve biological diversity vary depending on the ecosystem and its capability: the mix, relative abundance, and patch sizes of vegetative communities should be based in part on natural disturbance regimes and historical vegetation". This information is used to "set the stage" for activities planned in the Master Plan for a management unit. The NHI has data on occurrence and locations of rare features. Silvicultural handbook has information on natural disturbance regimes and historical locations of habitat types in the State.Master Planning process currently in use utilizes a range of regional assessments compiled by staff specialists. Natural Heritage Inventory identifies rare species and their habitats and is reviewed prior to project implementation.
6.1.b. Using available science and local expertise, the current ecological conditions are compared to both the historical conditions and desired future conditions within the landscape context. This comparison is done by employing the baseline factors identified in 6.1.a.	C	Field visits confirmed use of available science and local experience. Master plans that have been completed recently compare current condition of the management unit to both historic and desired future condition. Recent Master Plans include reference to historical conditions through incorporation of ecological assessments. Restoration efforts underway on numerous properties to enhance unique communities (ie. Goose Lake Prairie restoration, Red Cedar Lake SNA, pine restoration on Willow Flowage and Northern Highland/American Legion State Forest)
6.1.c. Prior to the commencement of management activities, potential short-term environmental impacts and their cumulative effects are evaluated.	C	The WDNR is doing an excellent job of evaluating environmental impacts. It is evident that DNR assess potential short-term impacts of management activities prior to commencement of these activities (e,g., impacts of logging equipment on soil compaction).At the project level, timber sale form 2460 includes analysis on potential site impacts and is reviewed by staff specialists prior to implementation. Impacts to water resources are addressed in water quality permitting process.
6.1.d. Using assessments derived from the above information, management options are developed and implemented to achieve the long-term desired future conditions and ecological functions of the forest (see also Criterion 7.1).	C	The WDNR is doing an excellent job of long-term management. It is evident that DNR personnel have developed appropriate management options for various habitat types to move them to a desired future condition.Updated Master Plans incorporate ecological assessments and clearly identify a variety of management options.
C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	**C**	

6.2.a. Although species that are state and/or Federally listed as threatened, endangered, of special concern, or sensitive, and their habitats are identified, their specific locations remain confidential.	C	Locations of rare features are pixilized up to a township section in data that are accessible by the public.NHI database identifies species locations and is utilized across all units. Data remains confidential for sensitive species. The data base is only accessible to managers.
6.2.b. If scientific data indicate the likely presence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive populations, either new surveys are carried out before field-management activities begin or the forest owner or manager assumes their presence and makes appropriate modifications in forest management.	C	We observed that foresters routinely use the NHI data to determine presence and location of rare features in a stand that has been identified for management. Surveys are carried out prior to management activities taking place. A meeting with a wildlife biologist determines whether new surveys are required or what the appropriate management should be to protect the feature. Audit revealed numerous examples of modifications made to project plans to protect sensitive species and their habitats. Biotic inventories conducted prior to Master Plan developments on state forests. DNR has array of species experts that are available for consultation.
6.2.c. For management planning purposes, forest owners or managers of publicly owned and large privately owned forests use, participate in, or carry out on-the-ground assessments for the occurrence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species.	C	This happens on many of the properties however staff shortages and low budgets make it difficult to do the job as thorough as most managers would like. This information is collected during RECON. For areas that do not have a master plan, or that have an old master plan, new biotic inventories have been or are currently being conducted. Biotic inventories and ecological assessments conducted prior to State Forest Master Planning Processes
6.2.d. Where they have been identified, state and/or Federally listed as threatened, endangered, of special concern, or sensitive species and their habitats are maintained and/or restored. Multiple-use management activities are acceptable, where the law allows, in these species' habitat areas to the extent that they are compatible with maintenance and restoration of the species.	C	SNAs protect or restore habitat for rare ecological species. The species and habitats are protected and enhanced if possible. Fire is often used to restore more open habitats like pine or oak barrens. Priority given to rare and sensitive species and habitats across all state lands. State Natural Areas primary role is protection and maintenance of special communities. Wildlife management areas often target unique habitats and rare species.
6.2.e. If a state and/or Federally listed as threatened, endangered, of special concern, or sensitive species is determined to be present, its location is reported to the manager of the species' database.	C	We observed that although new locations are reported for these rare elements, that there is a multi-year back-log in entering data into the database. This is especially the case on DNR Land. .A process is in place for local staff to report rare or sensitive species information. Concern was noted on backlog of data input to NHI data base. All occurrences are reported to the manger of the species database but there is a backlog of several years on getting the data entered. **See CAR 2008.10**
C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	**C**	
C6.3.a. Forest regeneration and succession	**C**	
6.3.a.1. Forest owners or managers make management decisions using credible scientific information (e.g., site classification) and information on landscape	C	All of the factors are evaluated and considered when the managers make the decision on what prescriptions will be carried out on the properties. This information

patterns (e.g., land use/land cover, non-forest uses, habitat types); ecological characteristics of adjacent forested stands (e.g., age, productivity, health); species' requirements; and frequency, distribution, and intensity of natural disturbances.		is available in a number of documents including the Silvicultural Handbook .Land managers utilize Kotar Habitat Classification System in assessing land capabilities. Field audit demonstrated a full range of management options being implemented that address local management goals and objectives. Planting activities target biodiversity considerations and promotion of unique communities. DNR Bureau of Endangered Resources personnel, especially regional ecologists, work closely with area managers.
6.3.a.2. Silvicultural practices encourage regeneration that moves the forest toward a desired future condition, consistent with information gathered in 6.3.a.1.	C	We observed that field personnel use appropriate silvicultural techniques to move the forest toward a desired future condition. Management practices promote underrepresented communities (ie. jack pine, white pine, oak). Early successional management emphasis on several wildlife management areas with big tree silviculture and native community management evident on state forests. Every effort is made to move the forest to the desired future condition; however, the high deer population often makes this a difficult if not impossible task.
6.3.a.3. Measures are taken to ensure the retention of endemic and difficult-to-regenerate species.	C	We observed that considerable effort is being made to regenerate oak (red, white and burr). Management practices promote underrepresented communities (i.e., jack pine emphasis on NH/AL State Forest, white pine management on Willow Flowage and NH/AL, oak restoration on Red Cedar Lake SNA, prairie restoration efforts on Goose Lake WMA. Deer continue to have an impact in the regeneration of certain tree and plant species especially in specific areas. In most of the state, deer populations are above established goal levels and efforts should be made to keep populations at these goals. The high deer population often makes this difficult but managers do take the steps to ensure the retention of the endemic and difficult to regenerate species.
6.3.a.4. Across the forest, or the landscape in which it is located, management actions lead to a distribution of successional stages, age classes, and community types appropriate to the scale and intensity of the operation and desired future conditions.	C	There are excellent efforts being made to make this happen. We observed a variety of forest management activities that will result in a number of different successional stages and community types across the landscape. State Forests and WMA's address a wide range of community types and successional stages. Harvests target stand improvement and address gaps in age class distributions. State Forest Master Plans incorporate Native Community Management emphasis.
6.3.a.5. When even-aged management (see Glossary) is employed, live trees and native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type (see Glossary). Exceptions may be allowed when retention at a lower level is necessary for purposes of forest restoration and/or rehabilitation or to maintain community types that exist on the site (e.g., oak-hickory, jack pine). The level of retention increases proportionally to the size of the harvest unit.	C	Harvest units reviewed included single tree and multiple tree retention with emphasis on underrepresented species or mast producing species.

C6.3.b. Genetic, species, and ecosystem diversity	**C**	**See CAR 2008.7**
6.3.b.1. Forest management conserves native plant and animal communities and species.	C	We observed that forest management on SNA's and State Parks are consistently managing for native plant communities. .Management activities across all divisions emphasize native communities with efforts observed to reduce or eliminate non-native species (ie. buckthorn removal). Every effort is made to conserve and enhance native plant and animal communities.
6.3.b.2. The forest owner or manager cooperates with local, state, and Federal agencies to protect and manage native plant and animal communities and species.	C	DNR is doing an excellent job in this respect. The DNR is mandated to protect Federally listed species. State land management clearly demonstrates emphasis of native communities and species.
6.3.b.3. There is a consistent scientific method for selecting trees to plant, harvest and retain in order to preserve and/or enhance broad genetic and species diversity.	C	Silvicultural handbook was developed by working groups of species experts familiar with local land capabilities. Excellent job.
6.3.b.4. Forest owners or managers maximize habitat connectivity to the extent possible at the landscape level (e.g., through an ecological classification system, at the subsection or land-type association level).	C	Master plans for several SNA's include plans to purchase private in-holdings to protect larger blocks of habitats and communities. This is also a conservation action in the new Wildlife Action Plan. Ecological assessments utilized in recent Master Plans include opportunities to promote connectivity and were incorporated into native community management areas. Habitat connectivity illustrated with grassland management emphasis to promote sharptail grouse on Pershing Wildlife Area.
C6.3.c. Natural cycles that affect the productivity of the forest ecosystem	**C**	**See CAR 2008.7**
6.3.c.1. Biological legacies of the forest community are retained at the forest and stand levels, consistent with the objectives of the management plan, including but not limited to: large live and declining trees, coarse dead wood, logs, snags, den trees, and soil organic matter.	C	The mangers are very cognizant of looking at this and ensuring that prescriptions are written to preserve the biological legacy. We observed that DNR staff follow site level guidelines in the Silviculture Manual. Harvest plans do not allow full tree removal in selective harvest units on many properties retaining woody debris on site. Harvest plans reviewed by wildlife specialists prior to implementation. Snag/reserve tree guidelines in silvicultural handbook.
6.3.c.2. Forest management practices maintain soil fertility and organic matter, especially in the A horizon, while minimizing soil erosion and compaction. If degradation of soil quality occurs, as indicated by declining fertility or forest health, forest owners or managers modify soil management techniques.	C	Emphasis shown on restricting harvests in moist soils to dry or frozen ground conditions. BMP's in place and being utilized to reduce soil impacts. Rutting guidelines in timber sale contracts. Policy is under development that will greatly assist mangers in this endeavor and they are already doing an adequate job with current techniques and knowledge.
6.3.c.3. Forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools), and forested riparian areas (see also Criterion 6.5).	C	We observed that in one area of the State a concerted effort to map and protect venal pools. BMP's followed for protecting wetlands across state lands. Harvest plans include areas identified where equipment use is restricted to protect wetlands. Excellent job.
6.3.c.4. Responses (such as salvage) to catastrophic events (such as wildfire, blowdown, and epidemics) are limited by ecological constraints.	C	Several pine harvests were in response to insect and disease outbreaks. Responses to catastrophic events, (windfall and disease vectors) show a reasonable degree of environmental restraint. All factors are considered prior to conducting salvage operations.
C6.4. Representative samples of existing ecosystems	**C**	

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.		
6.4.a. Forest owners and managers protect and reserve ecologically viable representative areas that are appropriate to the scale and intensity of the operation.	C	Wisconsin has one of the best SNA programs in the US. The audit included reviews of portions of the State Natural Area system. Biotic inventories and ecological assessments prepared with BER staff involvement were utilized during preparation of State Forest Master Plans. Field observations confirmed that the managers go to great lengths to protect and preserve ecologically viable representative areas.
6.4.b. Where existing protected areas within the landscape are not of adequate size and configuration to serve as representative samples of commonly occurring forest types as defined above, owners or managers of mid-sized and large forests, whose properties are conducive to the establishment of such areas, designates ecologically viable areas to serve these purposes.	C	BER staff heavily involved in development of current network of reserve areas across the state. Outstanding efforts in this area.
6.4.c. The size and arrangement and time scale of on-site representative sample areas are designated and justified using assessment methods and sources of up-to-date information described in 6.1.	C	The new WAP identifies areas in the State (all land ownerships) that have significant conservation value. State Natural Areas cover full representation of natural communities across the state. Up to date information is utilized where available.
6.4.d. Unless exceptional circumstances can be documented, known areas of intact old-growth forests are designated as representative sample areas under purpose 3. (See Applicability Note under 6.4 above) and are reviewed for designation as High Conservation Value Forests (HCVF- see also Applicability note under 6.3). Known areas of unentered stands of old-growth are carefully reviewed, screened for uniqueness, and considered as potential representative sample areas prior to undertaking any active management within them (see Applicability Note under 6.4). Old growth stands not designated as either a HCVF or a representative sample area are, at a minimum, managed to maintain their old-growth structure, composition, and ecological functions under purpose 3.	C	Biotic inventories conducted prior to recent Master Plan development identified and protected representative samples of old forests areas on NH/AL State Forest. We did not observe any old growth forests.
6.4.e. The size and extent of representative samples on public lands being considered for certification is determined through a transparent planning process that not only utilizes scientifically credible analyses and expertise but is also accessible and responsive to the public.	C	DNR has a process to include public input on planning documents. Master Plan process currently in place allows public participation and incorporates scientific analysis. Field observation indicates that this is occurring where there are current plans and as new plans are being developed they will be responsive to the public.
6.4.f. The process and rationale used to determine the size and extent of representative samples are explicitly described in the public summary.	C	A biotic inventory is conducted prior to Master Plan development is available to the public.
6.4.g. Managers of large, contiguous public forests (>50,000 acres) create and maintain representative protected areas within the forest area, sufficient in size to encompass the scale and pattern of expected natural	C	Several of the SNA's that the team visited protect large blocks of native habitat. For example, one wetland marsh that is currently being restored will represent the largest (in area) of the habitat type east of the

disturbances while maintaining the full range of forest types and successional stages resulting from the natural disturbance regime.		Mississippi River. While state lands vary in size, the larger state forests include protected areas of sufficient size to encompass the scale and pattern of natural disturbances.
C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	**C**	
6.5.a. A set of forestry best management practices (BMPs), approved by the state forestry agency or otherwise appropriate jurisdiction (e.g., BIA), that address water quality and soil erosion is adhered to (see also 1.1.b). These guidelines may include provisions on riparian management zones (RMZs), skidding, access roads, site preparation, log landings, stream crossings, disturbance of sensitive sites, and wetlands.	C	BMP's for forestry practices are in the Silvics Manual, and are utilized on all department properties and incorporated into all timber sale contracts. BMP's for invasive species are in development. BMPs have been developed and they are constantly being updated. Field observation indicated that mangers are using and are knowledgeable of the BMPs.
6.5.b. At a minimum, implementation of BMPs and other resource protection measures will result in the following:	C	By Department policy, BMP's are considered mandatory.
Logging and Site Preparation Logging operations and construction of roads and skid trails are conducted only during periods of weather when soil is least susceptible to compaction, surface erosion, or sediment transport into streams and other bodies of water.	C	The team observed a forester shutting down an operator due to wet soil conditions. Sites are evaluated for proper operating seasons during project planning. Restrictions are documented in timber sale contract to reduce soil movement and compaction. All of the harvest operations visited had specifications in the sale contract to address these issues.
Logging damage to regeneration and residual trees is minimized during harvest operations.	C	We observed one isolated stand where residual damage was higher than allowed. This contractor was let go after staff observed the site damage. Objectives of harvest specified in sale contracts. Sale administrators review sales weekly and notify contractors of excessive damage (ie. Plover River Fishery Area).
Silvicultural techniques and logging equipment vary with slope, erosion hazard rating, and/or soil instability with the goal of minimizing soil disturbance. Areas that exhibit an extreme risk of landslide are excluded from management activities that may precipitate landslides.	C	In general, harvesting is avoided on steep slopes or areas with high potential for erosion.
Plans for site preparation specify the following mitigations to minimize impacts to the forest resources: 1) 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. 2) Top soil disturbance and scarification of soils is limited to the minimum necessary to achieve successful regeneration of desired species.	C	The new biomass BMP's should be adopted to minimize possible future impacts to soil resources. Slash left scattered across most sale areas. Site preparation methods used appear to be the minimum necessary to achieve successful regeneration of target species.
Transportation System (including permanent and temporary haul roads, skid trails, and landings) The transportation system is designed, constructed, maintained, and/or reconstructed to minimize the extent of the road network and its potential cumulative adverse effects.	C	The team observed that roads were adequately maintained and designed. Sales planned to utilize existing road and trail systems to extent possible and protect natural features.
Access to temporary and permanent roads is controlled	C	We observed that many access roads had permanent

to minimize significant adverse impacts to soil and biota while allowing legitimate access, as addressed by Principles 3 and 4 and identified in the management plan.		locked gates to control access. DNR appears to find a good balance between allowing access and closing roads to avoid potential damage. While we were on site the forester asked the logger to cease operations because of wet conditions that were causing deep ruts.
Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.	C	Measures were noted across properties to reduce impacts of transportation systems. A problem site on the Flambeau State Forest was adequately repaired since previous audit. Foresters lay out the roads and skid trails on the sales and the logger has to use the designated trails.
Stream and Water Quality Protection Stream crossings are located and constructed in a way that minimizes fragmentation of aquatic habitat (see Glossary) and protects water quality.	C	New stream crossings were avoided if at all possible. Excellent job
Visual and Aesthetic Considerations Forest owners or managers limit and/or reduce negative impacts on visual quality caused by forest management operations.	C	The team found a number of management activities that were planned to accommodate visual concerns of trail users. Aesthetics are considered in the design and execution of sales. On Rib Mountain State Park, aesthetic concerns played a major role in recent management decision. Excellent job
C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.	**C**	
6.6.a. Forest owners and managers demonstrate compliance with FSC Policy paper: "Chemical Pesticides in Certified Forests, Interpretation of the FSC Principles and Criteria, July 2002" (available at http://www.fsc.org/en/whats_new/documents/Docs_cent/2) and comply with prohibitions and/or restrictions on 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.	C	Wisconsin DNR uses many chemicals in their efforts to reduce the impact or eliminate invasive plants and animal species.
6.6.b. Forest owners or managers employ silvicultural systems, integrated pest management, and strategies for controlling vegetation that minimize negative environmental effects. Non-chemical techniques are preferred in the implementation of these strategies.	C	Biotic control included in pest management strategies. In many instances it appeared that the use of chemicals was the preferred choice over alternate treatments. This could be a result of experience in treating the multitude of invasive species on almost all of the properties visited. **See CAR 2008.8**
6.6.c. Forest owners or managers develop written strategies for the control of pests as a component of the management plan (see Criterion 7.1).	C	DNR staff have written draft BMP's for controlling invasive species. Master plans include strategies for pest management on properties. Many of the

		management plans were written prior to the current invasive species problem and new plans will better address this issue.
6.6.d. If chemicals are applied, the most environmentally safe and efficacious chemicals are used. Chemicals are narrowly targeted, and minimize effects on non-target species.	C	BMP's for controlling invasive species outline manual, chemical and biological control for individual species. Guidelines are sensitive to issues involving safety and efficacy. Chemicals being used are most environmentally safe to obtain desired objectives. We did not see evidence that the most environmentally safe chemicals were used or that managers looked at using the minimal dose needed to accomplish the objectives.
6.6.e. Chemicals are used only where they pose no threat to supplies of domestic water, aquatic habitats, or Rare species or plant community types.	C	We observed that field staff had a good awareness of applying appropriate chemicals in the community in which they were working. Emphasis on using "over the counter" herbicides if possible. Field observations indicated this to be the case.
6.6.f. If chemicals are used, a written prescription is prepared that describes the risks and benefits of their use and the precautions that workers will employ.	C	DNR staff are required to get written permission from the agency before applying chemicals. Chemical use plans prepared prior to implementation on state properties. There is an approval process that must be followed prior to the use of chemicals.
6.6.g. 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	We observed that in one State Park staff were comparing plant species composition in two areas- one where and one where no chemicals were applied. Chemical use is documented and records maintained by certified applicators.
C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.		
6.7.a. In the event of a spill of hazardous material, forest owners or managers immediately contain the material, report the spill as required by applicable regulations, and engage qualified personnel to perform the appropriate removal and remediation.	C - OFI	Sale contracts call for operators to effectively contain spills with on-site spill kits. During field reviews spill kits were not always stored in close proximity of operating equipment. All employees applying restricted use chemicals are required to have a Certifies Applicator License and to follow all applicable procedures regarding spills and the use of chemicals.
6.7.b. Waste lubricants, anti-freeze, containers, and related trash are stored in a leakproof container until they are transported to an approved off-site disposal site.	C	Field reviews confirmed proper storage of lubricants and fuel.
6.7.c. Broken or leaking equipment and parts are repaired or removed from the forest.	C	No evidence observed during field review on sale sites of excessive spills or leakage.
6.7.d. Equipment is parked away from riparian management zones, sinkholes, or supplies of ground water.	C	Equipment viewed during audit was parked in acceptable locations. BMP's are incorporated through sale layout to minimize potential for equipment impact in or near riparian areas.
C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	**C**	
6.8.a. Exotic (i.e., non-indigenous), non-invasive predators or biological control agents are used only as part of a pest management strategy for the control of	C	DNR is employing biological control of purple loosestrife with great success. Use of biological control agents is limited on state properties. Audit

exotic species of plants, pathogens (see Glossary), insects, or other animals when other pest control methods are, or can reasonably be expected to prove, ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for indigenous species because, for example, exotic species can host pathogens that might diminish biodiversity in the forest.		noted evidence of use of agents to control purple loosestrife and spotted knapweed. Where biological control agents are used they are very carefully monitored and all applicable factors are considered prior to use.
C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	**C**	
6.9.a. Except on plantation sites (see also Criterion 10.4), the use of exotic tree species is permitted only in the first successional stages or other short-term stages for the purposes of restoring degraded ecosystems.	C	Native tree species and local genotypes are used in reforestation efforts.
6.9.b. The use of exotic species (see Glossary) is contingent on peer-reviewed scientific evidence that the species in question is non-invasive and will not diminish biodiversity. If non-invasive exotic species are used, the provenance and location of use are documented, and their ecological effects are actively monitored.	C	Little use of exotic species is currently occurring on state properties. Historically, exotics were often planted to obtain habitat objectives especially on state wildlife areas. We did not observe the use of exotic species except to control another exotic invasive. **See CAR 2008.11**
6.9.c. Written documentation is maintained for the use of exotic species.	NA	
6.9.d. Forest owners or managers develop and implement control measures for invasive exotic species.	C	DNR has drafted Best Management Practices for Invasive Species. While no coordinated statewide effort to control invasive plants is underway, local managers are conducting a variety of techniques to reduce species presence. Chemicals, hand removal and prescribed burning being conducted. Division of Forestry conducting invasive species inventory on priority areas. Wisconsin is very aggressive in developing and implementing control measures for invasive species. **See CAR 2008.6**
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.**	**C**	
6.10.a. Over the life of the ownership, forest to non-forest conversions are limited to the threshold of 1% of the forest area or 100 acres, whichever is smaller, except that a parcel up to two acres in size may be converted for residential use by the forest owner or manager.	C	Conversions to non-forested areas primarily restricted to prairie restoration and large grassland management areas for specific desired habitat conditions (ie. sharptail grouse).
6.10.b. When private forest lands are sold, a portion of the proceeds of the sale is reinvested in additional forest lands and/or forest stewardship.	NA	Forest stewardship funds are being used to acquire desired parcels for state control and management.

1.7 PRINCIPLE #7: MANAGEMENT PLAN

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.

This Principle is elaborated through 4 Criteria, which collectively call for a very high level of commitment to management planning.

Standard	C/NC	Comments/CARs
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.**	**C**	
7.1.a. Management objectives	**C**	
7.1.a.1. A written management plan is prepared that includes the landowner's short-term and long-term goals and objectives (ecological, social, and economic). The objectives are specific, achievable, and measurable.	C	The new management handbook, although quite lengthy provides a great template for writing management plans. Despite limited approved plans, property managers readily relate goals and objectives of parcels. Goals and objectives were available for public review on a majority of properties off the DNR website. There is a timetable set up for all units to prepare master plans however it will be a long time before all are done. The old plans are not very specific in all instances.
7.1.a.2. The management plan describes desired future conditions that will meet the long-term goals and objectives and that determine the silvicultural system(s) and management activities to be used.	NC	Updated Master Plans clearly identify desired future conditions and methods to reach them. However, the vast majority of properties are operating with outdated or no plans with little consideration for long term goals. As new plans are developed these factors will be taken into consideration. **See CAR 2008.1, 2008.2**
7.1.b. Description of forest resources to be managed,		

environmental limitations, land use and ownership status, socioeconomic conditions, and profile of adjacent lands		
7.1.b.1. The management plan describes the timber, fish and wildlife, harvested non-timber forest products, soils, and non-economic forest resources.	C	Updated Master Plans and planning template clearly describe resources present on properties. Many of the properties have plans that are over 20 years old and do not cover all that is included in 7.1 b1 thru 7.1b6, however as mangers implement prescriptions in these plans they are looking at all of the factors. As new plans are written all factors will be considered and evaluated.
7.1.b.2. The management plan includes descriptions of special management areas; sensitive, rare, threatened, and endangered species and their habitats; and other ecologically sensitive features in the forest.	C	In absence of Master Plans, NHI data base is available to property managers and is utilized in project planning.
7.1.b.3. The management plan includes a description of past land uses and incorporates this information into the vision, goals, and objectives.	C	Updated Master Plans and planning template describes historical land use. Will be incorporated in the new plans.
7.1.b.4. The management plan identifies the legal status of the forest and its resources (e.g., ownership, usufruct rights (see Glossary), treaty rights, easements, deed restrictions, and leasing arrangements).	C	Legal status and ceded territory rights are addressed in the Master Planning Handbook. .
7.1.b.5. The management plan identifies relevant cultural and socioeconomic issues (e.g., traditional and customary rights of use, access, recreational uses, and employment), conditions (e.g., composition of the workforce, stability of employment, and changes in forest ownership and tenure), and areas of special significance (e.g., ceremonial and archeological sites).	C	Cultural issues are considered in Master Planning process. Heritage sites are mapped and available through state archeological inventory.
7.1.b.6. The management plan incorporates landscape-level considerations within the ownership and among adjacent and nearby lands, including major bodies of water, critical habitats, and riparian corridors shared with adjacent ownerships.	C	Recent Master Plans incorporate adjacent land use patterns during planning process. Pershing WA feasibility study identified acquisition opportunities during property boundary adjustment.
7.1.c. Description of silvicultural and/or other management system	**C**	
7.1.c.1. Silvicultural system(s) and prescriptions are based on the integration of ecological and economic characteristics (e.g., successional processes, soil characteristics, existing species composition and structures, desired future conditions, and market conditions). (see also sub-Criterion 6.3.a)	C	All of these factors are considered when prescriptions are written and implemented.
7.1.c.2. Prescriptions are prepared prior to harvesting, site preparation, pest control, burning, and planting and are available to people who implement the prescriptions.	C	Field observation indicated that this is the case and managers were aware of and in most cases involved in the development of the prescription.
7.1.d. Rationale for the rate of annual harvest and species selection	**C**	
7.1.d.1. Calculations for the harvests of both timber and non-timber products are detailed or referenced in the management plan and are based on net growth, yield, stocking, and regeneration data. (see also 5.6.b)	C	New plans should reference this much better than the old plans. As the objectives for most of the properties visited is not timber production other values and products looked at in more detail.
7.1.d.2. Species selection meets the social and economic goals and objectives of the forest owner or manager and leads to the desired future conditions while maintaining or improving the ecological composition, structures, and functions of the forest.	C	Good job at this.

7.1.d.3. The management plan addresses potentially disruptive effects of pests, storms, droughts, and fires as they relate to allowable cut.	C	Yes, the audit team is satisfied that the collection of plan documents guiding DNR land management incorporate these issues.
7.1.e. Provisions for monitoring forest growth and dynamics (see also Principle 8)	**C**	
7.1.e.1. The management plan includes a description of procedures to monitor the forest.	C	Monitoring is addressed in planning documents.
7.1.f. Environmental safeguards based on environmental assessments (see also Criterion 6.1.)	**C**	
7.1.g. Plans for the identification and protection of rare, threatened, and endangered species. (see also Criterion 6.3.)	**C**	
7.1.h. Maps describing the forest resource base including protected areas, plannedplanned management activities, and land ownership.	**C**	
7.1.h.1. The management plan includes maps of such forest characteristics as: relevant landscape-level factors; property boundaries; roads; areas of timber production; forest types by age class; topography; soils; riparian zones; springs and wetlands; archaeological sites; areas of cultural and customary use; locations of sensitive, rare, threatened, and/or endangered species and their habitats; and designated High Conservation Value Forests.	C	Recent Master Plans utilize a large array of background information in planning process. Archeological and NHI data bases used to conserve key sites. All of these attributes are included on the maps in plans and in the maps generated for the prescriptions
7.1.i. Description and justification of harvesting techniques and equipment to be used. (see also Criterion 6.5)	**C**	
7.1.i.1. Harvesting machinery and techniques are discussed in the management or harvest plan and are specifically matched to forest conditions in order to minimize damage.	C	Timing of harvests is utilized to minimize effects.
7.1.i.2. Conditions for each timber sale are established by a timber sale contract or written harvest prescription and accompanying timber sale map.	C	Sale contracts are standardized and include harvest prescriptions and maps. Each sale has a contract that includes prescriptions and detailed specifications of how operations are to be conducted.
C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	**C**	
7.2.a. Operational components of the management plan are reviewed and revised as necessary or at least every 5 years. Components of the long-term (strategic) management plan are revised and updated at the end of the planning period or when other changes in the management require it. (see also Criterion 8.4)	NC	Monitoring plan process has been established but lacks analysis capabilities that would lead to adaptive methods to quickly address resource changes. The old plans are reviewed yearly as managers develop their work plans for the coming year. **See CAR 2008.1, 2008.2**
C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	**C**	
7.3.a. The forest owner or manager assures that workers are qualified to implement the management plan (see also Criterion 4.2).	NC	State personnel are well qualified but training is needed following Master Plan development to fully understand and implement plans. **See CAR 2008.1, 2008.2**
7.3.b. The management plan is understandable, comprehensive, and readily available to field personnel.	C	Recently completed Master Plans are understandable and available to field personnel. Audit found evidence of field personnel readily following Master Plans in project decision making. For the most part.
C7.4. While respecting the confidentiality of information,	**C**	

forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.		
7.4.a. A management plan summary that outlines management objectives (from sub-Criterion 7.1.a.), whether on private lands or the land pool under a resource manager, is available to the public at a reasonable fee. Additional elements of the plan may be excluded, to protect the security of environmentally sensitive and/or proprietary information.	C	Management plans are provided on request to the public at no charge. Many of the properties have the plan on a web page and the public can review plans in DNR offices.
7.4.b. Managers of public forests make forestry-related information easily accessible (e.g., available on websites) for public review, including that required by Criterion 7.1.	C	The Wisconsin DNR website contains a large amount of information for the public on resource management and other topics. Wisconsin has a good website and many of the properties have a web page specific to the property. This is under development and will improve as time and budgets allow.

1.8 PRINCIPLE #8: MONITORING AND ASSESSMENT

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.

As a conceptual and thematic companion to Principle 7, this Principle (elaborated through 5 Criteria) requires certified operations to engage in an aggressive and formal program of periodic monitoring of the impacts of management operations, focusing upon both bio-physical and socio-economic impacts as well as the extent of plan compliance.

Standard	**C/NC**	**Comments/CARs**
C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	**C**	
8.1.a. The frequency of monitoring activities follows the schedule outlined in the management plan.	C	Monitoring plans, identified in recent State Forests Plans, are being conducted. Formal plans have not been identified for most of the remaining properties at this time.
8.1.b. Monitoring is carried out to assess: • The degree to which management goals and objectives have been achieved; • Deviations from the management plan; • Unexpected effects of management activities; • Social (see Criterion 4.4) and environmental (see Criterion 6.1) effects of management activities.	NC	Monitoring is variable across ownerships with some long term monitoring of wildlife populations ongoing on WMA's to assess population responses while little or no monitoring is occurring on others. The recent State Forest plans contain monitoring protocol but are being utilized as a reporting tool rather than an analysis tool to adapt ongoing

		management activities if needed. This occurs yearly on most properties with the 20 plus year old plans. **See CAR 2008.3, 2008.4**
8.1.c. Public and large, private land owners or managers take the lead in identifying, initiating, and supporting research efforts to address pertinent ecological questions. Small and medium private land owners or managers use information that has been developed by researchers and other managers.	C	DNR has a research bureau that addresses a wide range of ecological issues. Much research is being conducted on these properties.
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) Yield of all forest products harvested. b) Growth rates, regeneration and condition of the forest. c) Composition and observed changes in the flora and fauna. d) Environmental and social impacts of harvesting and other operations e) Cost, productivity, and efficiency of forest management	**C**	
8.2.a. Yield of all forest products harvested	**C**	
8.2.a.1. The forest owner or manager maintains records of standing inventories of timber and harvest volumes of timber and non-timber species (quality and quantity).	C	The states Recon system provides this information. Improvements have been made in addressing Recon backlogs. Excellent records are kept of all activities.
8.2.b. Growth rates, regeneration, and condition of the forest	**C**	
8.2.b.1. An inventory system is established and records are maintained for: 1) Timber growth and mortality (for volume control systems); 2) Stocking, and regeneration; 3) Stand-level and forest-level composition and structure (e.g., by use of tools, such as ecological classification systems); 4) Abundance, regeneration, and habitat conditions of non-timber forest products; 5) Terrestrial and aquatic features; 6) Soil characteristics (e.g., texture, drainage, existing erosion); 7) Pest conditions.	C	All properties will have an inventory completed by the end of 2008. This has been a very aggressive program and is giving managers excellent information on which to make decisions they did not have in the past.
8.2.c. Composition and observed changes in the flora and fauna	**C**	
8.2.c.1. Forest owners or managers periodically monitor the forest for changes in major habitat elements and in the occurrence of sensitive, rare, threatened, or endangered species or communities.	C	Field personnel are on the lookout for new species occurrences and updates are made for changes in habitat elements. This is a major component of the management of the properties.
8.2.d. Environmental and social impacts of harvesting and other operations	**C**	
8.2.d.1. The environmental effects of site-disturbing activities are assessed (e.g., road construction and repair, harvesting, and site preparation).	C	DNR staff monitors site disturbance activities for compliance to BMP's. As most of these properties are highly used by the public and are in very visible areas environmental effects are carefully monitored and assessed.
8.2.d.2. Creation or maintenance of local jobs and public responses to management activities are monitored.	C	
8.2.d.3. Sites of special significance to American Indians are monitored in consultation with tribal representatives (see also	C	Known cultural sites are mapped, monitored and protected in partnership with the tribes.

Principle 3).		Where applicable
8.2.e. Cost, productivity, and efficiency of forest management		
8.2.e.1. Forest owners or managers monitor the cost and revenues of management in order to assess productivity and efficiency.	C	This is a given with tight or non existing budgets.
C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	**C**	
C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.	**C**	
8.4.a. Discrepancies between the results of management activities or natural events (i.e. yields, growth, ecological changes) and expectations (i.e. plans, forecasts, anticipated impacts) are appraised and taken into account in the subsequent management plan.	C	This happens on an every day basis.
C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	**C**	
8.5.a. A summary outlining the results of monitoring is available to the public at a reasonable fee, whether on private lands or a land pool under a resource manager or group certification.	NA	
8.5.b. Managers of public forests make information related to monitoring easily accessible (e.g., available on websites) for public review.	C	DNR provides any monitoring information that is available in a variety of ways to the public.

1.9 PRINCIPLE #9: MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS

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.

This FSC Principle is elaborated through 4 Criteria that collectively focus on the identification and appropriate management of areas within the defined forest area(s) that possess notable attributes meriting conservation. Such attributes may be ecological or social, in nature. Areas of high conservation value are to be managed so that the defining attributes are maintained or enhanced; focused monitoring must be undertaken with respect to efficacy of HCVF management strategies.

Standard	**C/NC**	**Comments/CARs**
C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	**C**	
9.1.a. Attributes and locations of High Conservation Value Forests are determined by:	C	DNR has demonstrated its commitment to identify and conserve HCV forests by

1) Globally rare, threatened, or endangered features, habitats, or ecosystems that may be present in the forest (suggested sources of information are: The Nature Conservancy, World Wildlife Fund, Conservation International, World Resources Institute); 2) Regionally and locally rare, threatened, or endangered features, habitats, or ecosystems that may be present in the forest; culturally and tribally significant areas; or municipal watersheds that may be present in the landscape and/or certified forest (suggested sources of information include natural and cultural heritage agencies); 3) Appropriate consultations with local and regional scientists and other stakeholders; 4) Public review of proposed HCVF attributes and areas on large-scale and public ownerships (see also 7.4, 4.4.e., 4.4.f.); 5) Integration of information from consultations and public review into proposed HCVF delineation; 6) Delineation by maps and habitat descriptions		conducting several comprehensive assessments (ie. Land Legacy Project, Natural Areas Program, CROG, and Regional Assessments). These processes have been open for review and the findings available for use by the public. The Deferral/Consultation Policy identifies and maintains HCVF areas during Master Planning across all DNR lands. Wisconsin has a very aggressive program in this area. There is a well established system of natural areas and a large number of naturalists employed by the agency.
C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	**C**	
C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	**C**	
9.3.a. Forest management plans and activities are appropriate for maintaining, enhancing and/or restoring attributes that make the area an HCVF.	C	The audit revealed efforts at the property level to restore or enhance natural communities (ie. prairie restoration on the Goose Lake WMA, oak savannah and wetland restoration at Red Cedar Lake NA, and white pine restoration at the Willow Flowage). Updated Master Plans include HCVF designation and management strategies. Field observation indicated this was occurring on all units. **See CAR 2008.5**
9.3.b. Active management in HCVFs is allowed only when it maintains or enhances high conservation values.	C	Management of reviewed HCVF's clearly showed that property managers placed the maintenance or restoration of these areas as top priority projects.
9.3.c. The management-plan summary includes information about HCVF management without compromising either the confidentiality of the forest owner or manager or environmentally and culturally sensitive features (see also sub-Criterion 7.1.f).	C	Managers take extra precautions to protect sensitive species or landscape features that could be compromised if important information is disseminated.
9.3.d. Forest owners or managers of HCVFs (forests and/or stands) coordinate conservation efforts with forest owners or managers of other HCVFs in the landscape.	C	The DNR works closely with other landowners towards the conservation of HCVF's across the state. Being the source of many of the official assessments, the DNR is often contacted by outside agencies for their data and expertise.
C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.		

9.4.a. Forest owners or managers of small forests may satisfy this requirement with informal observations (see 8.1 and 8.2.). When observations detect changes, the changes are documented.	NA	
9.4.b. Forest owners or managers of mid-sized and large forests monitor activities within and adjacent to HCVFs that may affect HCVF attributes (see Criteria 7.2, 8.1 and 8.2). Monitoring is adequate to track changes in HCV attributes, and may include informal observations. When monitoring detects changes to HCV attributes, the changes are documented.	NC	BER conducts periodic monitoring of State Natural Areas. Otherwise, little formal monitoring is occurring for other HCVF's across DNR properties. Good evidence that this is occurring amongst managers. **See CAR 2008.5**

1.10 PRINCIPLE #10: PLANTATIONS

Plantations shall be planned and managed in accordance with Principles 1 through 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.

This FSC Principle, elaborated through 9 Criteria, provides additional certification requirements specific to those operations where the nature and intensity of management practices and regimes is such that most, if not all, have the characteristics of a natural forest are absent. That is, plantations under the FSC use of the term are defined by the totality of the management regime, not on the means of stand establishment (e.g., clearcut and plant). The 9 Criteria address issues such as: plantation management objectives, diversity in the composition of plantations, plantation design and layout, natural areas within the plantation operation, control of pests and pathogens, periodic monitoring and conversion of natural forest to plantations. In brief, areas supporting natural forest cannot be converted to plantations through the use of plantation forest management regimes.

It was determined that this Principle does not apply to the WDNR's land management because the silvicultural regimes employed by the Department clearly meet the FSC definition of natural forest management. As such, DNR is not creating or maintaining stand conditions that meet the FSC definition of a plantation, which is the focus of Principle 10.

1.11 Controversial Issues

FSC requires the certification body to identify and briefly discuss, in a certification report, any controversial issues associated with the forest management unit for which certification is being sought. In the judgment of the SCS audit team, there are no highly controversial or contentious issues associated with DNR's management of the Wisconsin DNR properties. That is not to say that there are no aspects of state lands management that generate difference of opinion amongst the array of stakeholder groups who possess an interest in the manner in which these forests are managed. Such issues of active discourse include:

- Deer management—hunters want deer populations kept at maximum levels while environmental NGOs, conservation groups and scientists wish to see populations reduced
- Aspen management—hunters wish to see more early seral forest cover, including but not limited to aspen-dominated stands
- Recovery of the northern pinery/white pine—this is an active agenda item for environmental NGOs
- Forest fragmentation—environmental NGOs wish to see more large contiguous blocks of forest cover
- ATV use—more ATV access is a major objective of ATV user groups and opposed by environmental NGOs and wildlife advocates
- Old growth—environmental NGOs would like to see management aimed at restoring a greater extent of old growth stands on the state forests.

2.0 TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS

This section of the report addresses the procedures employed by the forest managers to track the flow of wood products from the point of harvest through to the point where custody is assumed by another entity (i.e., the wood products purchaser). The fundamental requirement that must be demonstrated by the forest management operation is that product from the certified forest area not be mixed with product from non-certified sources. This requirement is attained by compliance with the FSC Criteria for chain of custody. It is against these Criteria that SCS evaluated the management of the WDNR for potential award of chain of custody certification.

During the first 5-year certification of the Wisconsin State Forests the WDNR supplied to the SCS evaluation team a description of its log handling and tracking procedures. These procedures were found to be fully adequate for assuring tracking of wood sourced from the State Forests. As part of this re-certification evaluation which includes expansion of scope to include the "other state lands" administered by the DNR, the audit team was informed that the same chain of custody procedures previously determined as adequate for the State Forests are in use on the "other state lands." On this basis, we conclude the following.

2.1 Evaluation of Risks of Mixing Certified and Un-Certified Product

In that DNR's CoC responsibilities end at the point of severance of trees from the stump, the risks of mixing certified and un-certified products falls completely on all down-stream owners/handlers, such as loggers, sawmillers, etc.

2.2 Description of the Log Control System

Chain-of-custody certification is required throughout the supply chain if downstream purchasers and processors wish to carry forward the certified status of wood products sourced from the Wisconsin state lands. With respect to the state lands managed by Wisconsin DNR, the chain-of-custody focus is quite narrow, as the DNR exclusively sells standing timber. That is, the DNR does not have control of the flow of wood products from the state forests once the trees

have been severed from the stump, by the successful bidder.

In the case of its management of the Wisconsin state properties DNR's chain-of-custody obligations will include:

- Effectively notifying all purchasers of State timber sales that maintaining the FSC-certified status of the procured products requires each and every holder/owner of the product, from severance at the stump onward, to hold valid FSC-endorsed chain-of-custody certificates
- Providing SCS and/or the FSC with detailed information regarding all sales of state owned timber: purchaser's name and contact information, species and volume sold, date of sale
- Notifying SCS and/or the FSC of any instances when a purchaser of a state timber sale does not hold a valid FSC-endorsed chain-of-custody certificate
- Maintaining records for at least 5 years

During the fieldwork for the forest management evaluation, the evaluation team investigated the extent to which DNR can and is willing to comply with these chain-of-custody requirements. The audit team is satisfied that DNR, were it to accept certification, will competently execute its responsibilities for the limited portion of the chain-of-custody under its control.

The fundamental requirement that must be demonstrated by the land management operation (the certification applicant) is that product from the certified area not be mixed with product from non-certified sources as long as the product is under the control of the certification applicant. This requirement is attained by compliance with the 6 FSC Principles of Chain of Custody. It is against these criteria that SCS evaluated Wisconsin Department of Natural Resources for potential award of chain of custody certification as part of award of forest management certification.

The scope of DNR's control system is limited to keeping accurate records of the volumes (by species) of timber/logs sold: purchaser names, locations of timber, date of sale, and certification number of purchaser (if available). These records need to be compiled in annual reports that are available to SCS and/or FSC. DNR also has an affirmative obligation to inform purchasers that they must hold valid FSC CoC certificates if the wood products are to remain certified.

2.3 End Point of Chain of Custody

For DNR, the end point of chain of custody is severance at the stump.

2.4 Visual Identification at End Point of Chain of Custody

All logs purchased from and hauled off of the state lands are branded and/or marked and accompanied by trip tickets and bills of lading. The audit team is very satisfied that DNR procedures assure that all timber harvested and removed from the state lands are accurately accounted for.