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

Wisconsin Department of Natural Resources – County Forest Program

SCS-FM/COC-00083G

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CERTIFIED	EXPIRATION
22/Dec/2014	21/Dec/2019

DATE OF FIELD AUDIT
12-14/Aug/2015
DATE OF LAST UPDATE
18/Sep/2015

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Foreword

Cycle in annual surveillance audits			
☒ 1st annual audit	☐ 2nd annual audit	☐ 3rd annual audit	☐ 4th annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
Wisconsin Department of Natural Resources – County Forest Program (WCFP or FME)			

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

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

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

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (http://info.fsc.org/) no less than 90 days after completion of the on-site audit. Section B contains more detailed results and information for the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Annual Audit Team

Auditor Name:	Kyle Meister	**Auditor role**:	FSC Lead Auditor
Qualifications:	Kyle Meister is a Certification Forester with Scientific Certification Systems. He has been with SCS since 2008 and has conducted FSC FM pre-assessments, evaluations, and surveillance audits in Brazil, Panama, Mexico, Costa Rica, Bolivia, Indonesia, India, Japan, New Zealand, Spain, and all major forest producing regions of the United States. He has conducted COC assessments in Oregon, Pennsylvania, and California. Mr. Meister has successfully completed CAR Lead Verifier, ISO 9001:2008 Lead Auditor, and SA8000 Social Systems Introduction and Basic Auditor Training Courses. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan; and a Master of Forestry from the Yale School of Forestry and Environmental Studies.		
Auditor Name:	Tucker Watts	**Auditor role**:	SFI Lead Auditor
Qualifications:	Tucker Watts has over 30 years' experience in forest management, primarily in the southern U.S. He worked for many years for International Paper Company, first as a land management and procurement forester, then as an analyst, and finally as an environmental manager with considerable involvement in forest certification. Tucker has a BS in Forestry from Louisiana Tech, and MS in Forestry from Mississippi State University, and an MBA from Centenary College. He has participated in many forestry organizations, notably as a Trainer in the Louisiana Master Logger Program, as a team member for "Recommended Forestry Best Management Practices for Louisiana" and on various SFI State Implementation Committees. Tucker is trained as a Tree Farm Group Certification Auditor and has experience in SFI and FSC auditing from both sides, as an auditor and as the management representative of an organization being audited. Audit experience includes audits of pulp and paper mills, container and box companies, printers, distributers, and audits of recovered fiber and recycled content.		
Auditor Name:	Michelle Matteo	**Auditor role**:	Wildlife biologist/ assistant FSC/SFI auditor
Qualifications:	Michelle L. Matteo is a lead auditor for SCS based in Southern New England. Michelle is a forester and arborist and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Arborist Certification. Michelle has completed a 3-day ISO 19011 training designed & presented in relation to the FSC Standards, completed hundreds of CoC audits, certification audits of the Northeast Master Logger program, and is a team auditor for Forest Management audits. She earned an MS in Forestry and BS in Wildlife & Fisheries Biology, both from the University of Massachusetts.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	3
B. Number of auditors participating in on-site evaluation:	3
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	2

D. Total number of person days used in evaluation:	11

1.3 Standards Employed

1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC-US Forest Management Standard	1-0	July 2010
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSglobalServices.com).		

1.3.2. SCS Interim FSC Standards

Title	Version	Date of Finalization
SCS COC indicators for FMEs	5-1	December 2012
This SCS Interim Standard was developed by modifying SCS' Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of the Draft Regional / National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, the SCS Draft Interim Standard for the country / region was sent out for comment to stakeholders identified by FSC International, SCS, the forest managers under evaluation, and the National Initiative. A copy of the standard is available at www.scsglobalservices.com/certification-standards-and-program-documents or upon request from SCS Global Services (www.SCSglobalServices.com).		

2 Annual Audit Dates and Activities

2.1 Annual Audit Itinerary and Activities

11 – August – 2015	
FMU/Location/ sites visited	**Activities/ notes**
Crivitz, WI	Opening Meeting: Introductions, client update, review audit scope, audit plan, intro/update to FSC and SCS standards and protocols, and review of open CARs/OBS.
12 – August – 2015	
FMU/Location/ sites visited	**Activities/ notes**
Florence County (all auditors)	1. Timber sale 757: combination coppice and single-tree selection harvest. Coppice used to regenerate oak and aspen. Single-tree selection used in transition zones (oak-northern hardwood) and northern hardwood sites. Observation of aspen snags within coppice sites, and various snags within single-tree selection area. Regeneration monitoring will be completed by summer crews. 2. Timber sale 775: natural red pine stand marked for thinning from below with removal of aspen, suppressed jack, red, and white pine, and diseased spruce-fir component. Retention of vigorous red and white pine, Eastern hemlock, and Northern white-cedar. 2 streams present (no stream crossings) and buffers maintained. 3. Lunch & discussion: safety, training, etc. of Wisconsin County & DNR employees.

	4. Biochar experiment site (Dead Ox Timber sale): use biochar and manure mixture in planting of red pine. Discussion of experimental controls, measurements, hypothesis, and relationship to climate change adaptation projects. 5. Timber sale 728, BFR: oak site impacted severely with oak wilt. Oak removed and chipped. Regeneration of aspen and red maple present. Wood ash applied on snow over the winter followed by planting of Jack pine. Discussion of regeneration and stocking monitoring after planting. 6. Timber sale 768: active northern hardwood harvest; single-tree selection. Interview with logger on health & safety requirements, log specifications & sorts, BMPs, training on invasive species, and continuing education. Walk-through timber sale with logger to ask questions about slash, identification of retention trees, etc. Retained trees include ash, yellow birch, maples, and basswood. Discussion of loss of gap-phase species over time on higher quality sites. 7. Timber sale 797: lower quality northern hardwood marked selection harvest. Oak, aspen, and yellow birch components. Larger gaps to be created to secure regeneration. Scarification reserved as an option in case competition from understory vegetation is too high. Invasives may be an issue, as survey completed when many spp were dormant; potential for re-survey.
13 – August – 2015	
FMU/Location/ sites visited*	**Activities/ notes**
Forest County (FSC lead & FSC/SFI co-auditor)	1. Timber sale 466: aspen coppice and selection harvest of northern hardwood stand finished in 2014. Discussion of snag recruitment. Retention of longer-lived species; harvest of aspen, fir, white birch, and suppressed trees. Coppice area with reserves of maple, aspen, and other species dispersed throughout stand. Observed reserved Legacy trees. 2. Timber sale 477: Marked northern hardwood selection harvest with some gaps. Planned retention of maple, basswood, ash, yellow birch, red oak, butternut, etc. Evidence of snag recruitment in retained deformed and frost- or storm-damaged trees. Adjacent to equestrian trail. Road recently graded for harvest. 3. Timber sale 465: gravel pit. Topsoil and clays reserved in pile for reclamation after gravel and stone resource is exhausted. Gravel used on forest roads. Discussion of aesthetics, reclamation strategy, and conversion. Note that site does not qualify as conversion since it is for a management purpose, in this case maintaining roads. 4. Timber sale 459: single-tree selection of northern hardwood forest type to release advanced regeneration of maple, ash, basswood, and oak. Discussion over grass seed mixes for erosion control. Observation of property boundary that existed

	before sale, but is no longer relevant due to county's acquisition of adjacent property. Areas noted on drive out of site - Green tree retention areas located to include as many spp as possible. 5. Timber sale 460: larger aspen stand with dispersed and clumped retention of aspen and other species. Discussion of monitoring protocols for inventory and post-harvest regeneration. 6. Ruffed Grouse Management Area: discussion of early successional habitat management and rotation. Habitat management benefits primarily two game species, ruffed grouse and woodcock, and about thirty non-game species, including the Golden Winged Warbler, a State species of Greatest Conservation Need (SGCN). ~10 acre blocks are clearcut every ten years to maintain dynamic between early and mid-successional stages. 7. Timber sale 480: observation of HCVF adjacent to aspen strip clearcut complex. Coordinate with adjacent DNR lands on breaking up age classes of aspen. Retention grouped towards edges of sale due to its narrowness. Observation of >80' buffer width for stream. 8. Timber sale 464: smaller aspen coppice with retention of oak, hemlock, cedar and pine. Observation of dispersed and clumped aspen retention. 9. Porcupine Pelt timber sale: aspen coppice with dispersed and clumped retention. Retention clumps include maple, aspen, fir, and some small hemlock. Some retention clumps consist of wetlands and seeps. Adjacent block includes larger maples and hemlocks, which are seeding into harvest site. Discussion of retention's effect on efficiency of operations. 10. Acorn planting within old variable retention site: mixed Northern hardwood site was not achieving desirable mix of regeneration, so FME staff decided to plant some acorns of red and bur oak, both of which occur in the overstory. Regeneration included lots of ash and basswood, with some red oak, maple species, and black cherry.
Marinette County (SFI lead)	NA – SFI only
14 – August – 2015	
FMU/Location/ sites visited*	**Activities/ notes**
Oconto County (FSC lead)	Stakeholder consultation
Oconto County – Southern route (SFI lead)	1. Timber sale 269: Oak Shelterwood. Retain White Oak for wildlife and next stand. Controlled burn used to control aspen and understory regeneration. Oak regeneration established. Monitor regeneration to protect during harvest. No issues. 2. Timber sale 217: Oak shelterwood and thinning. Retention of snags. Red line for drain. No entrance into area. Good regeneration. No issues. 3. Timber sale 197: Red Pine thinning. Minimal damage to residual trees. Good tree selection. No issues.

	4. Timber sale 272: Clearcut for Poplar-Maple, Red Pine thinning. Minimal damage to residual trees in Red Pine thinning. Good regeneration in Poplar-Maple harvest. No issues.
Oconto County – Northern route (FSC/SFI assistant)	1. Timber sale 286: Active harvest site. Aspen coppice and single tree selection to release and improve stand quality, retaining oak and cedar. Regeneration included lots of oak and maple. Site is surrounded by residential land and all stands are near the roadside. Retention grouped towards edges of sale due to its narrowness. Evidence of snag recruitment in retained edges of stand. Interview with loggers on health & safety requirements, log specifications & sorts, BMPs, training on invasive species, identification of retention trees, and continuing education. Additional discussion of snag retention and harvester safety. Safety equipment, spill kits, and logger safety training records viewed on-site. Potential vernal pond viewed and machinery did not enter area and avoided wet seeps. 2. Cultural site: Site has been classified as non-harvestable. 3. Timber sale 253: release advanced regeneration by removing overstory of pin and red oak. Oak mortality is significant due to oak wilt. Oak and conifers retained. Site was hand-cut and good oak regeneration observed. 4. Brazeau Swamp: HCVF dominated by Northern white cedar. Site is a wintering deer yard and historical regeneration attempts through harvest failed due to the high winter deer populations. No harvesting currently occurs. Swamp observed from the bordering road with the SE/E border noted by a pine ridge. Area is frequented by local birders due to its large diversity of neo-tropical migrant birds, including the Golden Winged Warbler, a State species of Greatest Conservation Need (SGCN). 5. Timber sale 187: Regenerate tamarack stand with even-aged clearcutting with reserves. Sale has not yet been harvested and contract has been extended since 2010. No regeneration of any age classes of tamarack observed in the understory. Mature tamarack is declining due to multiple insect attacks. Discussion of the likely regeneration spp, based on observations of a privately owned adjacent stand of tamarack. Parcel between the road and the tamarack stand was purchased by the county recently and is primarily white cedar. 6. Timber sale 106: multiple smaller stands grouped to create one larger sale. Winter logging due to wet conditions. Aspen coppice, pine thinning with single tree selection, and uneven age harvest to retain oak and pine. Pockets of older pine, variety of age classes represented, and retained snags observed.
DNR offices – Oconto, WI	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm audit findings.
	Closing Meeting and Review of Findings: Convene with all relevant staff to summarize audit findings, potential non-conformities and

	next steps.

2.2 Evaluation of Management Systems

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME's conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3. Changes in Management Practices

There were no significant changes in the FME's management system that affected conformance to FSC requirements.

4. Results of the Evaluation

4.1 Existing Corrective Action Requests and Observations

	Finding Number: 2014.1
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC-US indicator 4.2.b.
Non-Conformity *(or Background/ Justification in the case of Observations)*: Firewood and moss harvesting permits do not include safety requirements. Evidence: permits reviewed for Jackson (moss), Clark (firewood), and Juneau (moss).	
Corrective Action Request *(or Observation)*: Contracts or other written agreements shall include safety requirements.	
FME response *(including any evidence submitted)*	This CAR was issued based on the observation that several firewood and moss harvesting permits did not contain any safety requirements. When the scope of this indicator and finding was discussed with our certification auditor during the closing meeting of the 2014 audit, he implied that the intent/focus should be on including safety requirements specifically in "forest management" agreements (e.g. firewood, planting, site prep., etc.). In 2011 the county forest group received a similar Minor CAR (2011.1) as a result of some county forest timber sale contracts not containing adequate safety language. CAR 2011.1 was closed in 2012 after all FSC certified county forests added safety language to timber sale contract templates. The Wisconsin County Forest Program has reviewed this recent finding 2014-01 in detail and has responded in two distinct ways. The Wisconsin County Forest Program recognizes that some written agreements (i.e. contracts) utilized by individual county forest group members did not contain safety requirements. In order to rectify this situation, the WDNR County Forest Specialist worked with the Wisconsin County Forests Association's (WCFA) Legislative and Certification Committee to develop standard template language that could be utilized by individual county forest group members, with additional consultation and potential adaptation from their county legal counsel, to be included in written agreements (contracts) that are directly related to forest management activities (i.e. planting, site prep, timber stand improvement, forest invasive species treatment). The WDNR County Forest Specialist sent the template language and guidance to include the template language or similar language, including safety requirements, in forest management written agreements (contracts) to the FSC certified county group members on 03/09/15. That communication is included below under supporting materials. The finding cited evidence that indicated several Wisconsin County Forest Program permits issued by group members did not contain specific safety requirements and that this was out of conformance with indicator 4.2.b. The Wisconsin County Forest Program group members and the Wisconsin DNR strongly disagree with this assertion on two main grounds.

	This indicator and the entire criterion were written specifically to address the health and safety of employees and their families, not members of the public at large that utilize the property. Numerous activities by members of the public may be authorized via a permit on a property, including firewood gathering, camping, moss harvesting, access to private property, and recreational trail usage. These activities are authorized and regulated via a permit system to ensure greater control over how these activities are conducted on a property. The relationship of a county forest to the permittee is one of a landowner to a member of the public who may be allowed to perform a certain activity under a set of permit conditions, not a forest worker/employee or their family. Additionally, when asked about including safety language in county forest permits, the legal counsel for many county group members indicated that such requirement can or should not be included, as inclusion of such requirements would create liability for permittees for activities which are covered by Wisconsin's recreational immunity laws. By including any specific safety requirements in permits, a county may be eroding its immunity under Wisconsin law and may be creating an unacceptable liability for permitting such recreational uses. Additionally, this indicator is written to specifically address "contracts or other written agreements"; license or permits are NOT agreements/contracts creating a vested property right, so they are distinguishable under Wisconsin law. **Definition of License** Normally, "license" is right or permission granted by competent authority to do an act which without such license would be illegal. State v. Jackman, 60 Wis.2d 700 (1973); State ex. Rel. Fairchild v. Wisconsin Automotive Trades Ass'n, 254 Wis. 398 (1949); Ford Motor Co. v. Lyons, 137 Wis.2d 893 (Wis. App. 1987) **Definition of Permit** To "permit" and to "authorize" are synonymous. State v. Laven, 270 Wis. 524 (1955) Firewood permits for example authorize someone to harvest firewood in a manner regulated by the County so as not to harm the underlying public values associated with a healthy forest (i.e., don't cut live trees, don't damage surrounding trees or property, etc., all designed to protect the public interest). Any fee received is for administration, and unlike timber sale contracts, is not done on a "volume" or "value" basis, which would be more similar to an offer-acceptance-consideration model for standard contract law. Below are numerous examples of Wisconsin case law that further illustrate the distinction of a permit from a contract/written agreement. - "The fact that a person is once licensed **does not create a vested property right** in such person, as advancements in the trade or profession may require additional conditions to be complied with if the general welfare of the public is to be protected." State ex rel Week v. Wisconsin State Bd. Of Examiners in Chiropractic, 252 Wis. 32 (Wis. 1947) - In the ordinary licensee-licensor relationship, primary benefit is to the

	licensee, **and the license is a mere sufferance on the part of the licensor**. Rehse v. Industrial Com'n, 1 Wis.2d 621 (1957). - A legislative act may confer upon an agency of government authority to grant or withhold a license, provided that where discretion is to be exercised by such agency proper standards or guides for use of discretion are established and that act does not confer power to exercise discretion unreasonably, arbitrarily or capriciously. Graebner v. Industrial Com'n, 269 Wis. 252 (1955) - **A statue giving power to license must be strictly construed; and doubts arising from the language employed must be resolved in favor of the public**. Reliance Laundry & Cleaning Co. v. City of Milwaukee, 151 Wis. 194 (1912); Chain Belt Co. v. City of Milwaukee, 151 Wis. 188 (1912) - The statute regulating the practice of architects and professional engineers is founded in the police power of the state to protect public welfare and to safeguard the life, health and property of its citizens' **the statute is for the benefit and protection of the public and not for the benefit of the persons licensed thereunder**. State ex rel. Wisconsin Registration Bd. Of Architects and Professional Engineers v. T. V. Engineers of Kenosha, Inc., 30 Wis.2d 434 (1966) - Imposition of additional burdens on licensed commercial fishermen by the conservation commission acting under statute delegating to the commission power to regulate fishing in outlying waters are not subject to redress, **since the fishermen are bound to know that the licenses issued to them are subject to such new laws as might be enacted, and regulations of the commission which might change specifications of equipment which they could use as commercial fishermen if the welfare of the public requires such changes**. Olson v. State Conservation Commission, 235 Wis. 473 (1940) The Wisconsin County Forest Program does support safety of members of the public using county forest properties for recreation. As evidence of such support, County Forest Program group member counties and the Wisconsin County Forests Association collaborated with the Forest Industry Safety and Training Alliance (FISTA) over the past year to coordinate and provide a location for FISTA to conduct chainsaw safety workshops for interested members of the public.
SCS review	FME has provided a reasonable argument to demonstrate that permits related to harvest and collection from the second clause of indicator 4.2.b (*Contracts or other written agreements shall include safety requirements*.) are not subject to this requirement. Specifically, a permit does not create an employment or contractual agreement; license or permits are NOT agreements/contracts creating a vested property right per the evidence the FME provided. However, as the FME has described, health & safety measures are addressed in other ways for permittees.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.2
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): No deadline
FSC Indicator:	FSC-US indicator 6.3.f and 6.3.g.1.
Non-Conformity *(or Background/ Justification in the case of Observations)*: For even-aged red pine stands at final harvest, auditors observed un-entered retention islands with species that were generally representative of the dominant species found on the site (red pine, oak, maples, etc.). On aspen stands, individual tree and clumped retention observed consisted of oak and pine species, with little to no aspen retained. County forest managers stated that the reason for little to no retention of aspen within clearcut areas was due to forest health concerns such as conks (i.e., fungus) and insect pests.	
Corrective Action Request *(or Observation)*: WCFP should consider providing written justification for situations in which it opts to not maintain dominant species found on site, particularly in aspen stands.	
FME response *(including any evidence submitted)*	This CAR was issued based on the observation that on a number of timber sales the green tree retention did not retain species that were dominant or co-dominant in the stand prior to harvest. Indicator 6.3.f includes the following, "trees selected for ***retention*** are generally representative of the dominant species naturally found on the site." This was most often observed in aspen and jack pine regeneration harvests, where little or no aspen or jack pine were left. Foresters were typically able to fully describe the reasons for their choices (e.g. forest health concerns, blow-down potential, desire to shift stand composition, site prep limitations, etc.), but those reasons were not always clearly described on the 2460. In order to address this FSC observation, all foresters were instructed to provide reasonable written justification in the 2460 timber sale cutting notice narrative when green tree retention does not maintain species that are representative of the dominant species naturally found on the site
SCS review	FME demonstrated email records of having sent this instruction to county forest managers. Timber sale narratives (form 2460) for even-aged management stands written since the advice was sent included descriptions of harvests in which retention of trees generally representative of dominant species on aspen harvests observed (e.g., Florence County: Timber sale 757; Forest County: Porcupine Belt and Timber sale 464; and Oconto County: Timber sale 262-14), and for harvests in which retention of dominant trees was not include due to small acreage of harvest site, narrowness of harvest site, or forest health concerns (e.g., Oconto County: Timber sales 286-15, 247-13, 286-15). No sites with jack pine as a dominant component of the overstory were visited in 2015; however, as confirmed during interviews, timber sale preparers and writers are aware of the new guidance and have been describing the rationale behind retention decisions.

Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.3
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): No deadline
FSC Indicator:	FSC-US indicator 9.1.a.
Non-Conformity *(or Background/ Justification in the case of Observations)*: HCV assessment framework appears to not have been updated. Examples include Juneau and Clark Counties, which include descriptions of recreational areas, ruffed grouse habitat, and other exceptional resources that likely do not meet the definition of HCV according the FSC-US framework. Certain HCV types are provided when WCFP reports HCV areas to SCS, but types are not specified in management plans (e.g., Winx Flowage). Post-audit, WCFP conducted a root-cause analysis and discovered that some of these areas were lumped into the HCV area due to a reporting error. The error involved selecting more special management areas in the reporting of HCV acreage to SCS. While the scale of the issue is small and WCFP presented evidence of the most up-to-date HCV classification, further work may be necessary to determine the scope of any further misclassification or misunderstanding of HCVs within WCFP's management system.	
Corrective Action Request *(or Observation)*: WCFP should ensure that HCVs are properly identified per the six recognized types in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F of the FSC-US standard.	
FME response *(including any evidence submitted)*	This CAR was issued based on the observation that one (and potentially additional) county forest comprehensive land use plans included ruffed grouse management areas in a section of the plan that identifies High Conservation Value Forests (HCVFs). As a result of the identification of such management areas in that section of county forest plans, the Wisconsin County Forest Program accidently reported several of these grouse management areas as HCV5 in the annual Certificate Registration Information document, which contains total acres for each of the six HCV types. Shortly after the 2014 audit the Wisconsin County Forest Program reviewed all FSC certified plans and confirmed that the grouse management areas in question are not identified specifically as HCVFs, but instead are described as exceptional resource areas. When summarizing the acreage of HCVFs by the 6 types for our 19 FSC certified county forests, these areas were mistakenly included in the *Description & Location* column and 560 acres in the *Area* column of the HCVF summary table. This was simply a reporting error and subsequently a revised version of the Certificate Registration Information document was provided following the audit, which removed the grouse management areas from the HCVF table and which was incorporated into the final 2014 FSC Audit Report.

Appendix F of the 2010-2014 FSC-US Standard provides guidance to forest managers on what types of sites should be considered in determining the presence of HCVs on the FMU and provides definitions and examples which can be used to accurately identify and categorize HCVs by the six defined HCV types. When County Forest Comprehensive Land Use Plans were last revised in whole, Appendix F of the FSC-US standard and the FSC-US Draft HCVF Assessment Framework did not yet exist. When Appendix F was developed and incorporated into the 2010-2014 FSC-US standard and reporting by each of the six types was first required, the Wisconsin County Forest Program did its best to accurately report HCVFs by type. Following the 2014 Wisconsin County Forest Program audit, the audit team provided Appendix F and the non-normative FSC-US Draft High Conservation Value Forest Assessment Framework document along with Observation 2014.3.

The Wisconsin County Forest Program has completed a comprehensive review of all previously reported HCVFs and the associated County Forest Comprehensive Land Use Plans to ensure that all HCVFs are properly identified and reported per the six recognized types in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F of the FSC-US standard. This review resulted in updated and more accurate reported acreages for many HCVFs, removal of several additional areas that had previously been mistakenly categorized as HCVFs (e.g. Eau Claire wilderness areas), some amended and more detailed County Forest Comprehensive Land Use Plan language (e.g. Oconto County), and a recategorization of some HCVFs previously reported by the wrong category (e.g. HCV3 -> HCV1). The most significant recategorization was a shift of the majority of what had been reported as HCV3 (forest areas that are in or contain rare, threatened or endangered ecosystems, such as old growth, barrens, savannah, etc.) to the HCV1 category (globally, regionally or nationally significant concentrations of biodiversity values). The majority of HCVs identified on Wisconsin County Forest Lands had previously been reported as HCV3, but are more accurately categorized as HCV1s. They are areas which contain significant concentrations of biodiversity values, often key areas for threatened and endangered species. The table below provides a current summary of high conservation value forests on Wisconsin County Forest Program lands.

HCV1	31,586	Globally, regionally or nationally significant concentrations of biodiversity values (e.g. T&E species).
HCV2	5,112	Globally, regionally or nationally significant large landscape level forests.
HCV3	2,252	Forest areas that are in or contain rare, threatened or endangered ecosystems (e.g. old growth, barrens, savannah, etc.)
HCV4	320	Forest areas that provide basic services of nature in critical situations (e.g. Drinking water supply, flood mediation, etc.).

	HCV5		Forest areas fundamental to meeting basic needs of local communities (hunting & commercial timber harvest are not included).
	HCV6	5	Forest areas critical to local communities' traditional cultural identity (e.g. religious & sacred sites.).
	Total	**39,275**	
SCS review	FME updated its HCV classification per the most recent requirements and guidance from FSC-US. When prompted on any stakeholder consultation that occurred as a result of HCVF reclassification, FME responded thusly: *The majority of the changes to HCV classifications that resulted from the Wisconsin County Forest program response to this Observation were simply made to correct previous errors in categorization of HCVFs. Several were erroneously reported as HCVFs in the past that were never intended to be HCVFs and that were never clearly identified as HCFVs in County Forest Comprehensive Land Use Plans. A great many were erroneously reported as HCVF type 3 historically, but are more accurately categorized at type 1 based on a closer review of guidance included in Appendix F. When these HCVFs were initially identified, appendix F did not exist and as such the HCVFs were not categorized at that time. When Appendix F was incorporated into the FSC2010-2015 Standard and we were asked to report acreage by type, we erroneously categorized many sites that protect significant biodiversity values (e.g. T&E&SC **species**) as HCV type 3 (which should actually be for rare/endangered **ecosystems**), when they actually are better categorized as type 1. This was simply a reporting error which we have corrected in response to Observation 2014.3; as such, no stakeholder consultation was conducted to confirm/solicit feedback on these corrections. Rather we are simply reporting our HCVFs more accurately now based on a more thorough review of Appendix F and interpretation of Comprehensive Plans. Correcting this error doesn't' rise to the level of a significant change in HCV attributes, areas, or management and, as such, didn't rise to the level of requiring the public review process detailed in Indicator 9.2.b. If the corrections were of such magnitude to require a forest plan amendment, then there would be a full public process.* *In one case, the County Forest Comprehensive Land Use Plan was actually amended to clearly add, remove, and clarify details on designated HCVFs. This occurred in Oconto County and the process involved consultation between Oconto County Forestry, DNR Forestry, DNR Wildlife, and DNR Natural Heritage Conservation experts and was vetted through the full formal public process that is involved with an amendment to the County Forest Comprehensive Land Use Plan. This is the process for informing and soliciting feedback from interested parties. The Plan amendment and the County Board Resolution documenting the public notice and opportunity for public to provide input on the proposed amendment adding, removing and clarifying details on HCVFs on the Oconto County Forest are attached.* SCS reviewed the changes to HCVF classification. Overall, HCVF acreage was overestimated in the past due to reporting errors, such as lumping all HCVF and		

	special management areas into one category (FME included non-HCVF acreage in its reporting of HCVF acreage to the certification body). SCS reviewed the changes in classification of HCV3 to HCV1 and agrees that Appendix F of the FSC-US Forest Management Standard, V1-0, more explicitly distinguishes between RTE ecosystems and significant concentrations of RTE species and includes regional guidance. Declassification of HCVs in Oconto County was addressed in a publicly reviewed amendment to the management plan. FME is cataloguing changes in HCV acreage in a spreadsheet for all counties in preparation for updating county management plans when the 15-year revision process starts again and the FSC-US standard is updated. The process of updating HCV classification during plan updates will be a significant undertaking; since there are currently no significant changes outside Oconto County, additional stakeholder consultation over HCV classification would be of little benefit.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

4.2 New Corrective Action Requests and Observations

	Finding Number: 2015.1
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): All FSC counties	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): no deadline
FSC Indicator:	FSC-US indicator 1.1.a.

Non-Conformity *(or Background/ Justification in the case of Observations)*: The Wisconsin County Forest Program (WCFP) was established per County Forest Law (s 28.10 & 28.11 Wis. Stats.) (County Forest Comprehensive Land Use Plans (CLUP) – Ch 905(typically). Only county lands currently enrolled under the County Forest Law are included within the scope of this FSC multi-site certificate, which ensures that management planning and public consultation and processes are in place, as required by the County Forest Law.

About eight acres of forestland in Forest County were withdrawn from the County Forest Law to address some third-party access issues in a manner that is not allowed under the County Forest Law, but by stipulation concerted between involved parties these acres, and documented in the withdrawal order, shall “remain in county forest ownership, be open for public use, and be managed for timber production, wildlife habitat, and recreation”. This acreage is so small that it could be grouped with adjacent timber sales on lands enrolled as county forest upon harvest. For harvest on lands not enrolled as county forest to be eligible for FSC certification, compliance with legal and/or administrative requirements must be followed and program modifications made to ensure that forest management on non-County Forest Law lands is compliant with applicable certification requirements (e.g., Chain of custody, management planning, public consultation, etc.).

Corrective Action Request *(or Observation)*: Forest management plans and operations should demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations).	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

5. Stakeholder Comments

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

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

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

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

5.1 Stakeholder Groups Consulted

Contractors	Indigenous people

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

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

☐ *FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.*	
Stakeholder comments	**SCS Response**
Economic concerns	
None received.	
Social concerns	
In the seven years that I have been in this position, I have not heard about the County's permit system for hunting and gathering rights. We have another permit system on Federal lands that uses scannable identification cards. It would be easier for the tribe to issue the permit or to issue via a tribal organization such as GLIFWC. Why does the County close some harvest roads?	In response to the question, Forest County has several users of the forest. Recreational pressure has increased in recent years, which is why the County has closed certain roads so that recreation does not interfere with sensitive forest resources. For example, certain sites visited in the 2015 audit were closed so that regeneration could be secured or so that sensitive features such as freshwater springs and wetlands could be protected. There are still plenty of places in the forest that are open to the public at large, as confirmed through an observation of maps demonstrating recreational areas such as trails. For questions on the County's permitting system, post-audit both the FME and the tribal stakeholder followed up with other tribal members and SCS**.** After being interviewed, the tribal member followed up with tribal leadership, which informed him that the Forest County Forest Administrator had in fact attended a Great Lakes Intertribal Council meeting on November 18, 2013 with representatives from five different Chippewa Tribal Communities present and discussed the process to obtain tribal gathering permits to exercise gathering rights on all county forest lands within the ceded territory. Additionally, the stakeholder reviewed the 15 Year Comprehensive Land Use Plan on file with his respective tribal government, and verified that a gathering permit process/system is available and in place with Forest County. Upon learning of this consultation, the stakeholder interviewed contacted the SCS auditor who had interviewed him and the Forest County Forestry office to provide a correction to the information he provided during the audit. Additionally, the tribal stakeholder confirmed that the tribe has had interactions with both the Forest County Forest Administrator and the recently hired DNR Liaison Forester. FME has thus demonstrated a high level of conformance to tribal consultation requirements, including incorporating recent hires into the process.
Environmental concerns	
None received.	

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team	**Yes** ☒ **No** ☐

recommends that the certificate be sustained, subject to subsequent annual audits and the FME's response to any open CARs.	
Comments: FME continues to demonstrate exemplary performance in a number of areas, including within-harvest unit retention and species diversity, and treating smaller stands that have been neglected during past management in a way that is beneficial for wildlife and local economies in a program informally called "No stand left behind." An examination of several stands reveals efforts to retain healthy Eastern hemlock and Yellow birch to attempt to secure regeneration of these species that were once more common in the landscape prior to large-scale logging and fires in the late 1800s to early 1900s. Where Eastern hemlock occurs on the landscape, on all county forests visited there are efforts to retain large and small individuals within timber harvest units.	

7. Changes in Certification Scope

Any changes in the scope of the certification since the previous audit are highlighted in yellow in the tables below.

Name and Contact Information

Organization name	Wisconsin DNR		
Contact person	Joe Schwantes		
Address	101 S. Webster St. P.O. Box 7921 Madison, WI 53707	Telephone	608-264-9217
		Fax	608-266-8756
		e-mail	joseph.schwantes@wisconsin.gov
		Website	http://dnr.wi.gov/topic/CountyForests/

FSC Sales Information

☒ *FSC Sales contact information same as above.*			
FSC salesperson			
Address		Telephone	
		Fax	
		e-mail	
		Website	

Scope of Certificate

Certificate Type	☐ Single FMU	☒ Multiple FMU
	☐ Group	
SLIMF (*if applicable)*	☐ Small SLIMF certificate	☐ Low intensity SLIMF certificate
	☐ Group SLIMF certificate	
# Group Members (*if applicable)*		
Number of FMUs in scope of certificate	19	
Geographic location of non-SLIMF FMU(s)	*Latitude & Longitude:* See table on page 9.	

Forest zone	☐ Boreal	☒ Temperate	
	☐ Subtropical	☐ Tropical	
Total forest area in scope of certificate which is:		**Units:** ☐ **ha or** ☒ **ac**	
privately managed			
state managed			
community managed	1,646,961 acres (Rpt.50A - FSC only)		
Number of FMUs in scope that are:			
less than 100 ha in area		100 - 1000 ha in area	
1000 - 10 000 ha in area	4	more than 10 000 ha in area	15
Total forest area in scope of certificate which is included in FMUs that:		**Units:** ☐ **ha or** ☐ **ac**	
are less than 100 ha in area			
are between 100 ha and 1000 ha in area			
meet the eligibility criteria as *low intensity* SLIMF FMUs			
Division of FMUs into manageable units:			
FMU are individual County Forests which are further subdivided into compartments and stands.			

FSC Data Request

Production Forests

Timber Forest Products	**Units:** ☐ **ha or** ☒ **ac**
Total area of production forest (i.e. forest from which timber may be harvested)	1,326,535 forested area scheduled for management (Rpt.101)
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	127,3912(PR, SW and 2/3 PJ) (Rpt.102)
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	1,199,143
Silvicultural system(s)	**Area under type of management**
Even-aged management	
Clearcut (clearcut size range (1-264 (15.45 avg) ac (WisFIRS export))	613,570 - A, 1/3 PJ, OX (Rpt.102)
Shelterwood	164,893 PW and O
Other: (e.g., coppice, seed-tree)	130,137
Uneven-aged management	
Individual tree selection	222,823 NH
Group selection	67,720 BH, SH, CH
Other:	
☐ Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	

The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Acres: (Rpt. 201) 12,449 ASPEN 167 BOTTOMLAND HARDWOODS 286 WHITE BIRCH 489 WHITE CEDAR 6 CENTRAL HARDWOODS 192 BALSAM FIR 280 FIR SPRUCE-*OLD CODE, RECODE 82 HEMLOCK 5 MISCELLANEOUS CONIFEROUS 6 MISCELLANEOUS DECIDUOUS 848 RED MAPLE 11,509 NORTHERN HARDWOODS 4,712 OAK 612 SCRUB OAK 1,086 JACK PINE 4,171 RED PINE 1,634 WHITE PINE 823 BLACK SPRUCE 229 SWAMP CONIFER 2,357 SWAMP HARDWOODS 146 WHITE SPRUCE 578 TAMARACK **42,667 Total acres**
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	Sphagnum moss- <20,000 bales annually (0391B sub-product); N6.3.1 Christmas trees 15 trees and 18 tons of boughs (WisFIRS export product 40 & 42T)
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
Data is derived from "WisFIRS" which is database that contains all recon, treatment, and timber sale data for State and County Lands. Sustainable rate of harvest is based on long term harvest goals (15yr avg.) under an area control system.	
Species in scope of joint FM/COC certificate: *Scientific/ Latin Name* (Common/ Trade Name)	

Species	Scientific Name
Aspen/Popple:	*Populus tremuloides*
	Populus grandidentata
Balsam poplar	*Populus balsamifera*
Bottomland hardwoods:	
Eastern Cottonwood	*Populus deltoides*
Swamp white oak	*Quercus bicolor*
Siver maple	*Acer saccharinum*
American elm	*Ulmus americana*
River birch	*Betula nigra*
Green ash	*Fraxinus pennsylvanica*
Central hardwoods:	
White oak	*Quercus alba*
Bur oak	*Quercus macrocarpa*
Black oak	*Quercus velutina*
Northern pin oak	*Quercus ellipsoidalis*
Black walnut	*Juglans nigra*
Butternut	*Juglans cinerea*
Shagbark hickory	*Carya ovata*
Bitternut hickory	*Carya cordiformis*
Black cherry	*Prunus serotina*
Red maple	*Acer rubrum*
Hackberry	*Celtis occidentalis*
Balsam fir	*Abies balsamea*
Eastern hemlock	*Tsuga canadensis*
Miscellaneous conifers:	
Scotch pine	*Pinus sylvestris*
European larch	*Larix decidua*
Norway spruce	*Picea abies*
Eastern redcedar	*Juniperus virginiana*
Blue spruce	*Picea pungens*
Miscellaneous deciduous:	
Norway maple	*Acer platanoides*
Boxelder	*Acer negundo*
Black locust	*Robinia pseudoacacia*
Honey locust	*Gleditsia triacanthos*
Eastern Hophornbeam, Ironwood	*Ostrya virginiana*
Musclewood, Bluebeech	*Carpinus caroliniana*
Northern hardwoods:	
Sugar maple	*Acer saccharum*
Yellow birch	*Betula alleghaniensis*
White ash	*Fraxinus americana*
American beech	*Fagus grandifolia*
American basswood	*Tilia americana*
White birch	*Betula papyrifera*
Northern red oak	*Quercus rubra*
Red Pine	*Pinus resinosa*
Jack Pine	*Pinus banksiana*
Eastern white pine	*Pinus strobus*
Black spruce	*Picea mariana*
Tamarack	*Larix laricina*
Black ash	*Fraxinus nigra*
White spruce	*Picea glauca*
Northern white cedar	*Thuja occidentalis*

FSC Product Classification

Timber products			
	Product Level 1	**Product Level 2**	**Species**
X	**W1 Rough Wood**	W1.1 Roundwood (logs)	16,289 MBF and 351,021 cds. (Rpt. 37A-total cordwood minus small diameter reported below) –All species listed above.
X		W1.2 Fuel Wood	~1,435 cds. –All species listed above. (Rpt. 37A – Firewood)

☐		W1.3 Twigs	
☐	**W2 Wood charcoal**		
☒	**W3 Wood in chips or particles**	W3.1 Wood chips	<4" diameter (prod code 26) and mixed diameter (prod code 24)- Rpt. 37A (total cords-sum of cords by species) 190,325 cd eq. –All species listed above.
☐	**Other***	Please List:	
Note: If your operation produces processed wood products such as wood pellets, planks, beams, poles etc. please discuss with SCS staff as you may need a separate CoC certificate.			

Non-Timber Forest Products			
	Product Level 1	**Product Level 2**	**Product Level 3 and Species**
☐	**N1 Bark**		
☐	**N4 Straw, wicker, rattan and similar**	N4.1 Rattan cane (rough form)	
☐		N4.2 Rattan taper (clean, peeled and spitted)	
☐		N4.3 Decorative objects and wickerwork	
☐		N4.4 Rattan furniture	
☐		N4.5 Rattan furniture components	
☒	**N6 Plants and parts of plants**	N6.1 Flowers	
☒		N6.2 Grasses, ferns, mosses and lichens	Sphagnum moss (*Sphagnum* spp.)
☒		N6.3 Whole trees or plants	☒ N6.3.1 Christmas trees 15 trees and 18 tons of boughs (WisFIRS export product 42T)
☐		N6.4 Pine cones	
☐	**N7 Natural gums, resins, oils and derivatives**	N7.1 Rubber/latex	
☐		N7.2 Gum resin	
☐		N7.3 Resin and manufactured resin products	
☐		N7.4 Tannin	
☐		N7.5 Essential oils	
☐	**N9 Food**	N9.1 Nuts	
☐		N9.2 Tea	
☐		N9.3 Palm-hearts	
☐		N9.4 Mushrooms, truffles	

☐		N9.5 Fruits	
☐		N9.6 sap-based foods	
☐		N9.7 Game	
☐		N9.8 Honey	

Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	10,302Acres (WisFIRS report; prefix F, J, K, N, or S and Z)

High Conservation Value Forest/ Areas

High Conservation Values present and respective areas: **Units:** ☐ **ha or** ☒ **ac**

	Code	HCV Type	Description & Location	Area
☒	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Assorted bogs, Wetland communities, fens, kettle lakes, and other areas containing significant biodiversity values (including endangered & threatened species) - Numerous counties(13)	31,586
☒	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally-occurring species exist in natural patterns of distribution and abundance.	Upper Nemadji Floodplain Forest –Douglas Brazeau Cedar Swamp - Oconto Penokee Range Hardwood-Iron Silent Wood Benchmark Forest-Washburn	5,112
☒	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Barrens-Eau Claire, Clark, Douglas, Jackson Old Growth/ pine relics-Forest, Juneau, Sawyer, Taylor Oak Savanna- Washburn	2,252
☒	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Winx Flowage – Clark	320
☐	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		0
☒	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	Burial Mounds - Oconto	5
Total Area of forest classified as 'High Conservation Value Forest/ Area'				39,275

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

☐ N/A – All forestland owned or managed by the applicant is included in the scope.		
☒ Applicant owns and/or manages other FMUs not under evaluation.		
☐ Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
Explanation for exclusion of FMUs and/or excision:	29 County Forests exist in WI. 19 of them have chosen to commit to FSC certification. The other 10 are either SFI certified or not certified under any forest certification program. Within each county, there may be forestlands that are outside of the scope for other reasons, such as being inaccessible to forest management for timber production or not otherwise being suitable for forest management, and not being enrolled as county forest land under s. 28.11 of the Wisconsin statutes.	
Control measures to prevent mixing of certified and non-certified product (C8.3):	Each FMU has its own log or haul tickets that include the appropriate certificate codes as applicable. Non-certified FMUs are not permitted to use any certificate codes. Forest areas outside of the scope within certified counties typically are not managed through timber harvests and, in cases where harvests occur, products are kept separate during harvest and delivery.	
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	**Location (city, state, country)**	**Size (☐ ha or ☒ ac)**
Refer to table 1.1.2 of this section and the FMU summary table below.	Scattered across WI.	~730,000 acres.
County owned lands within FSC certified counties that are not enrolled as county forest lands under s. 28.11 of the Wisconsin statutes.	Scattered across WI.	~50,000 acres

WI County Forest FMU Summary

SFI Certificate: NSF-SFIS-1Y943
FSC Certificate: # SCS-FM/COC-00083G -
county sub-code

County Name	Certification Status	FSC County Sub-code	General Location Latitude	General Location Longitude	Forest Administrator	Email Address	Co. Forest Lands	Special Use Lands	Total Acres
Ashland	FSC/SFI	a	46° 12' 45" N	-90° 28' 56" W	Chris Hoffman	choffman05@centurytel.net	40,323.33	0	40,323.33
Barron	FSC/SFI	b	45° 37' 16" N	-91° 52' 6" W	'John Cisek'	john.cisek@co.barron.wi.us	16,264.69	0	16,264.69
Bayfield	FSC/SFI	r	46° 47' 12" N	-90° 58' 52" W	Jason Bodine'	jbodine@bayfieldcounty.org	169,394.62	0	169,394.62
Burnett	SFI		45° 52' 29" N	-92° 10' 38" W	Jason Nichols	jnichols@burnettcounty.org	105,425.18	0	105,425.18
Chippewa	FSC	c	45° 11' 50" N	-91° 14' 53" W	Dahlby, Mike	mdahlby@co.chippewa.wi.us	32,968.88	1,614.56	34,583.44
Clark	FSC	d	44° 35' 54" N	-90° 47' 46" W	Rick Dailey	rick.dailey@co.clark.wi.us	134,190.32	63.5	134,253.82
Douglas	FSC/SFI	S	46° 17' 39" N	-92° 0' 7" W	'Jon Harris'	jharris@douglascountywi.org	263,263.85	15,636.14	278,899.99
Eau Claire	FSC/SFI	e	44° 45' 9" N	-91° 2' 7" W	Joshua Pedersen	Josh.Pedersen@co.eau-claire.wi.us	51,565.23	1168.88	52,734.11
Florence	FSC/SFI	f	45° 46' 53" N	-88° 15' 4" W	'Patrick Smith'	psmith@co.florence.wi.us	36,331.65	63.15	36,394.80
Forest	FSC/SFI	g	45° 31' 52" N	-88° 52' 26" W	'David Ziolkowski'	dzforestco@ez-net.com	13,643.73	0	13,643.73
Iron	FSC/SFI	h	46° 17' 45" N	-90° 13' 48" W	Eric Peterson	icfadmin@ironcountyforest.org	173,111.30	1,048.02	174,159.32
Jackson	FSC/SFI	i	44° 20' 57" N	-90° 32' 6" W	'Jim Zahasky'	jim.zahasky@centurytel.net	119,405.90	2,685.40	122,091.30
Juneau	FSC/SFI	j	44° 1' 2" N	-90° 8' 14" W	Brian Loyd	pfadm@co.juneau.wi.us	15,931.07	1,867.72	17,798.79
Langlade	SFI		45° 20' 1" N	-89° 4' 14" W	Erik Rantala	erantala@co.langlade.wi.us	128,117.41	1,885.24	130,002.65
Lincoln	FSC/SFI	q	45° 22' 57" N	-89° 50' 45" W	'Kevin Kleinschmidt'	kkleinschmidt@co.lincoln.wi.us	100,421.30	421.75	100,843.05

Marathon	SFI		44° 52' 11" N	-89° 41' 33" W	Tom Lovlien	tglovlien@mail.co.marathon.wi.us	29,384.47	552.1	29,936.57
Marinette	SFI		45° 27' 39" N	-88° 10' 59" W	Pete Villas	pvillas@marinettecounty.com	226,502.95	3,528.91	230,031.86
Monroe	Not Certified		44° 6' 50" N	-90° 44' 54" W	Chad Ziegler	cziegler@co.monroe.wi.us	6,848.69	432.3	7,280.99
Oconto	FSC/SFI	k	45° 2' 24" N	-88° 16' 40" W	Robert Skalitzky	robert.skalitzky@co.oconto.wi.us	43,546.40	159.43	43,705.83
Oneida	SFI		45° 35' 24" N	-89° 37' 1" W	John Bilogan	jbilogan@co.oneida.wi.us	82,098.31	179.2	82,277.51
Polk	SFI		45° 36' 21" N	-92° 43' 11" W	Jeremy Koslowski	jeremy.koslowski@co.polk.wi.us	16,445.71	698.04	17,143.75
Price	FSC/SFI	l	45° 34' 9" N	-90° 23' 54" W	'Eric Holm'	eric.holm@co.price.wi.us	91,472.81	795.01	92,267.82
Rusk	SFI		45° 35' 15" N	-91° 4' 19" W	Paul Teska	pteska@ruskcountywi.us	88,765.62	240	89,005.62
Sawyer	FSC/SFI	m	45° 42' 43" N	-91° 3' 9" W	'Greg Peterson'	greg.peterson@sawyercountygov.org	115,196.50	0	115,196.50
Taylor	FSC/SFI	n	45° 19' 15" N	-90° 3' 47" W	Russ Aszmann	russ.aszmann@co.taylor.wi.us	17,591.86	18.86	17,610.72
Vernon	Not Certified		43° 35' 16" N	-91° 0' 29" W	Andy LaChance	andy.lachance@vernoncounty.org	997.46	0	997.46
Vilas	SFI		46° 2' 8" N	-89° 17' 19" W	John Gagnon	jogagn@co.vilas.wi.us	41,011.42	101.27	41,112.69
Washburn	FSC/SFI	o	45° 57' 3" N	-91° 44' 54" W	'Mike Peterson'	mlpeters@co.washburn.wi.us	148,312.05	721.67	149,033.72
Wood	FSC/SFI	p	44° 22' 45" N	-90° 6' 2" W	'Fritz Schubert'	fschubert@co.wood.wi.us	37,069.75	692.58	37,762.33
Totals :							**2,345,602.46**	**34,573.73**	**2,380,176.19**

Prepared by Division of Forestry, July 15, 2015

WI. Department Of Natural Resources

	Total Acres
FSC	1,646,961.91
SFI	2,203,060.48
Non-certified	8,278.45

8. Annual Data Update

8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
# of male workers : 1,059	# of female workers : 73	
Number of accidents in forest work since last audit:	**Serious:** 0	**Fatal:** 0

8.2 Annual Summary of Pesticide and Other Chemical Use

☐ *FME does not use pesticides.*

Commercial name of pesticide / herbicide	**Active ingredient**	**Quantity applied annually (kg or lbs)**	**Size of area treated during previous year**	**Reason for use**
Garlon 4	Triclopyr	10.75 gal	21.75 acres	Garlic Mustard
Accord XRT/Glyphopsate	Accord XRT/Glyphopsate	99 Gallons	264 Acres	Red Pine Site Prep
Milestone	Aminopyralid	.04 gal.	1	Invasive Control
Milestone	aminopyralid	1/8 oz	<1000sq ft	Leafy spruge control
Milestone VM	aminopyralid + triclopyr amines	4 oz.	1.5 ac.	spotted knapweed control
Chopper/Imazapyr	Chopper/Imazapyr	41 Gallons	264 Acres	Red Pine Site Prep
Transline	Clopyralid	.06 gal.	1	Invasive Control
Cellu-treat	disodium octaborate tetrahydrate	20 gallons	135 ac	Annosum Root Rot treatment
Element 4/Triclopyr	Element 4/Triclopyr	114 Ounces	5.5 Acres	Common Buckthorn Treatment
Forestry Garlon XRT/Triclopyr	Forestry Garlon XRT/Triclopyr	37.35 Gallons	240 Acres	Red Pine Release and Barrens Site Management
element4	Garlon	2 gallons	10 acres	Oak wilt control
Cornerstone Plus	Glyphosate	46 oz	~ 0.5-1.0 ac	Garlic Mustard
Rodeo	Glyphosate	10.13 gal	22	Site Prep
Accord XRT II	Glyphosate	75.52 gal.	135.5	Site Prep
Cornerstone	Glyphosate	5 gallons	4 ac.	weed control on bike trail
Cornerstone Plus	Glyphosate	3% solution - spray to wet	20-25 acres	Garlic Mustard Control
Round-Up	Glyphosate	2.5% solutions	spot treatments	Invasives near parks & roads
Glyphosate	Glyphosate	2.5% and 5% solution rates	20 ac.	Control vegetation
Chopper Gen 2	Imazapyr	19.32 gal.	157.5	Site Prep

OrthoVolk Oil Spray	mineral oil	32 oz.	6 ac.	smother gypsy moth egg masses
Tordon K	Picloram*	.09 gal.	1	Invasive Control
Rodeo/Glyphosate	Rodeo/Glyphosate	91 Gallons	244 Acres	Red and Jack Pine Release
Sporax	sodium tetraborate decahydrate	5 gallons	49 acres	annosum prevention
Sulfomet XP/Sulfometron Methyl	Sulfomet XP/Sulfometron Methyl	29 lbs	475 Acres	Red Pine Site Prep and Release
Oust XP	Sulfometuron methyl	18 oz. (1-1.5 per acre)	12 acres	Control vegetation
Oust ZP	Sulfometuron methyl	0.94 oz	~ 0.5-1.0 ac	Garlic Mustard
Sulfomet Xtra	Sulfometuron Methyl	9.61 lbs.	157.5	Site Prep
Oust	Sulfometuron methyl	1 oz/acre	9 acres	Garlic Mustard Control
Spike 20p	tebuthiuron	27.9 lbs	38.5 acres	Wildlife openings maintenance
Transline/Clopyralid	Transline/Clopyralid	12 Ounces	2.25 Acres	Black Locust Treatment
Garlon 4 Ultra	Triclopyr	76.13 gal.	92.1	Oak Release
Garlon 4 Ultra, Element 4	triclopyr	14 gallons	25 ac.	buckthorn control

**FME is aware that this is included on the updated FSC list of High Hazardous Pesticides (FSC-STD-30-001a) and is working with Wisconsin DNR to research alternatives before the effective date of FSC-STD-30-001a.*

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected For Evaluation

☐ FME consists of a single FMU

☒ FME consists of multiple FMUs or is a Group

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

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other – please describe
Florence County	Non-SLIMF, Large	Natural Forest	Ease of access; random sample
Forest County	Non-SLIMF	Natural Forest	Ease of access
Marinette County	SFI only – NA	Natural Forest	NA
Oconto County	Non-SLIMF, Large	Natural Forest	Ease of access

Appendix 2 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Mark Heyde	Forest Certification Coordinator		Field and meeting
Joseph Schwantes	DNR, County Forest Specialist		Field and meeting
Jane Severt	WCFA, Executive Director		Meeting
Jason Cotter	DNR, Wildlife biologist		Field and meeting
Carly Lapin	DNR, NHC – Ecologist		Field and meeting
Liz Wood	DNR, Forest County Liaison		Field and meeting
Pat Smith	Florence County Administrator		Field and meeting
Brian Spencer	DNR, Forestry staff specialist		Field and meeting

Michael Luedeke	WCFA – board member		Field and meeting
Henry Sullivan	DNR, Floreence		Field and meeting
Eric Brolin	Florence County Recreation & Forestry		Field and meeting
Andy Nault	Florence County Forester		Field and meeting
Robbie Richard	Florence County, limited term employee		Field and meeting
David Ziolkowski	Forest County, Forest Administrator		Field and meeting
Gary Zimmer	WCFA, Assistant executive director		Field and meeting
David Halfman	DNR, Wildlife biologist		Field and meeting
Bob Skalitzky	Oconto County Forest Administrator		Field and meeting
Ryan Severson	DNR, Area Forestry Supervisor		Field and meeting
Shelley Wrzochalski	DNR, County Forestry Liaison		Field and meeting
Dave Borisch	Forestry Foreman		Field and meeting
Katherine Lenz	DNR, Area specialist		Field and meeting

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Jason Quade	Sokaogon Chippewa Community	715-478-7560; Jason.quade@scc-nsn.gov	Phone	Y
Joe Church	TPJ, LLC	715-587-1049	Field	N
Cecil Holbrook	Tigerton Lumber Company		Field	N
James Pool	Tigerton Lumber Company		Field	N

Appendix 3 – Additional Audit Techniques Employed

No additional audit techniques were employed.

Appendix 4 – Pesticide Derogations

☐ There are no active pesticide derogations for this FME.	
Name of pesticide / herbicide (active ingredient)	**Date derogation approved**
FME has derogation for hexazinone, which has not been used since before 2014; no use was reported in 2014 or 2015. As of February 2015, hexazinone is no longer on the list of FSC Highly Hazardous Pesticides (HHP).	9/Dec/2014

Appendix 5 – Detailed Observations

Evaluation Year	FSC P&C Reviewed
2014	All – (Re)certification Evaluation
2015	• Natural forests > 50,000 ha (123,553 ac) and FMUs containing HCVs: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.9, 8.2 and 9.4 • Other Criteria selected: 1.4, 3.1, 3.3, 3.4, 4.3, 6.10, 8.1, 9.1, 9.2, 9.3
2016	
2017	
2018	

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

The Wisconsin County Forest Program (WCFP) employs several documents to guide management. There are three main levels of documentation that comprise the Forest Management Plan (FMP):

DNR liaison:

- WDNR Public Forest Lands Handbook 2460.5 & WDNR Timber Sale Handbook 2461
- Wisconsin Forest Management Guidelines (WFMG)
- BMP Manuals
- Cutting Notice & Report – Form 2460

Wisconsin County Forests Association (WCFA)

- Strategic Plan (2012)
- Documentation and training programs to support the Strategic Plan

Individual Counties:

- Comprehensive Land Use Plans (CLUP or county plan)
- Annual Work Plans (AWP)
- Partnership meeting minutes
- Timber Sale Contracts

In the FSC-US Forest Management Standard Checklist, the abbreviations cited above may be used.

FSC Principles Checklist

FSC Forest Management Standard (v1.0)—United States

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles **Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.**		
1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
1.1.a *Forest* management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and ***administrative requirements*** (e.g., regulations). Violations, outstanding complaints or investigations are provided to the ***Certifying Body*** (CB) during the annual audit.	C	See **OBS 2015.1.**
1.1.b To facilitate legal compliance, the ***forest owner*** or ***manager*** ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	NE	
1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	NE	
1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	NE	
1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	C	SCS confirmed that no unresolved conflicts have been detected through a review of FME's internal audit documents for 2013-14. The 15-year term FMP was accepted as a viable timeline for the revision of the FMP due to State Statute 28.11(5)(a), which directs county forest managers to develop new comprehensive land use plans every 15 year. Moreover, FMPs are living documents and updated frequently. For example, the Oconto FMP was updated in May 2015 and an official amendment to the plan was completed.
1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or	C	Timber theft and trespass issues on County Forest

implements measures intended to prevent illegal and unauthorized activities on the ***Forest Management Unit*** (FMU).		properties are dealt with locally, and are typically investigated by county law enforcement, DNR forester-rangers, or county forest patrol officers. See below for more detail incidents reported by county. Ashland, Barron, Bayfield, Eau Claire, Forest, Iron, Jackson, Lincoln, Oconto, Price, Sawyer, Taylor, Washburn, and Wood Counties reported no incidents. • Chippewa: Nothing unusual in Chippewa County. In recent years there has been greater coordination between our staff, the Sheriff's Department and the DNR Conservation Wardens. We have met with the Sheriff's Dept. and are planning for greater patrol in 2016. As part of 2016 Budgeting, our Dept. will budget $ 15,000 to contract the Sheriff's Dept. for a specific patrol schedule during periods of peak use and peak unauthorized activity. • Clark: The Clark County Sherriff's Department issues citations for ordinance violations on the county forest throughout the year (i.e. off trail ATV use, unpermitted firewood cutting, illegal tree stands, etc.). There have been no recent occurrences of illegal timber harvest activity on the Clark County Forest. • Douglas: No gross violations. Minor violations during active timber sale activity that were handled through provisions in the timber sale contract. • Florence: We recently had a trespass issue arise from a new survey. It is currently being worked on by meeting with the adjacent landowner to discuss the issue and how to resolve it. A gate and deer stand need to be relocated and ATV trails need to be closed down. Landowner is potentially looking into an adverse possession claim. We are doing our best to not let that happen. • Juneau: Illegal dumping of garbage, tires, and construction materials does periodically occur on the FMU. The Sheriff's Department has caught a few individuals taking part in this, and the Forestry Department has improved signage in common dump areas.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	
1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	NE	
Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
2.1. Clear evidence of long-term forest use rights	NE	

to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.		
2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.	NE	
2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	C	
2.3.a If ***disputes*** arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.	C	Other than what was reported under C1.5 for Florence County, FME has reported no disputes over tenure or use rights. FME maintains documentation over all disputes over tenure and use rights, as confirmed via examination of records and interviews with staff. FME is currently using existing mediation and legal channels to resolve the issue in Florence County.
2.3.b The forest owner or manager documents any significant disputes over tenure and use rights.		
Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	NA	
3.1.a Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.	NA	FME does not manage any tribally-owned FMUs.
3.1.b The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.	NA	
3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	C	
3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their	C	County Board meetings and forestry committee meetings in which policies for resource management and work plans are set allow for public input, including Native American organizations. The DNR and Counties also maintain

resources or rights.		relationships with local Tribes and solicit input as needed as confirmed through interviews with the FME. DNR staff maintain information on tribes in the FMP: • Tribal Map of WI (8-2013) • Tribal Contact List (7-2014) WCFP sent letters to 11 Tribes (as well as Great Lakes Indian Fish and Wildlife Commission GLFWC) deemed to be potentially interested in management of the County Forests as part of the CLUP writing process in 2004-2006. The letters provided contact information for the County Administrators, described the County Forests, the County Forest planning process, and invited participation on identifying archaeological and cultural resources. Thus, all County Forests have met the minimum requirement for this Indicator. Additionally, all County Forests have participated in cultural resources training that included at least one tribal representative. In Forest County, staff maintain periodic contact with two local tribes over tribal gathering rights on county public lands within the ceded territory. Forest County Forest Administrator (Dave Ziolkowski) attended a Great Lakes Intertribal Council meeting on November 18, 2013 with representatives from five different Chippewa Tribal Communities present and discussed the process to obtain tribal gathering permits to exercise gathering rights on all county forest lands within the ceded territory. Other counties visited in 2015 have had minimal contact with most tribal members as they are not located in as close a proximity to those county forests.
3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	WCFP covers common measures taken to protect tribal resources in the CLUP – Ch 200. The Timber Sale Cutting Notice Form 2460 is also used to document any field-level precautions and measures to take. Forest County demonstrated that measures to protect special sites were respected in forest management, as confirmed through interviews with stakeholders.
3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
3.3.a. The forest owner or manager invites consultation with tribal representatives in	C	Timber Sale handbook (page 32-5) requiring a check of the cultural database be included for all County Forest timber

identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.		sales and that such information be included on the Timber Sale narrative (Form 2460-1A). If special sites have been identified on a specific County, unit-level descriptions often mention that sites have been found or not (e.g., Oconto County). FME staff consult with tribes on the location of known archeological sites, as confirmed in interviews in Forest County. The Chippewa and Potawatomi Tribes have rights to hunting and gathering on public lands within the ceded territory. Several of these rights are described in treaties and in decisions made during court trials over these rights. The tribes are invited for consultation during management plan writing. At the Forest County level, tribes have been consulted on law enforcement and economic development. DNR does consultations with tribes at broad levels over concerns on certain resources, such as birch bark.
3.3.b In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).	C	In consultation with tribes, Forest County demonstrated that a special site was avoided during a timber harvest that occurred during the past five years.
3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NA	
3.4.a The forest owner or manager identifies whether ***traditional knowledge*** in forest management is being used.	NA	According to interviews with FME staff and site members, no protected traditional knowledge is used in forest management. Any use of NTFPs is not commercial and employs management practices that are either in the public domain (e.g., maple sugaring) or do not constitute protected traditional knowledge (e.g., deer population management). SCS confirmed through observation of management practices that FME does not employ any protected traditional knowledge.
3.4.b When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.	NA	
3.4.c The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.	NA	
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	NE	
4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	C	

4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	FME reported no accidents since the last audit, as confirmed during interviews. FME requires documented evidence of FISTA training for all logging contractors, as confirmed during review of timber sale contracts in FME offices. Auditors observed evidence of safe felling techniques and use of PPE in the field on the part of contractors. In all County offices, auditors observed displays of OSHA requirements. FME demonstrated sample training records for its own staff and provided evidence of meeting agendas for trainings held over the past year.
4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	C	FME provided clarification over its permitting system in response to Minor CAR 2014.1, which shows that permits do not constitute a contract or other written agreement. Loggers interviewed during the 2015 assessment made proper use of PPE and demonstrated evidence of safe felling techniques, as confirmed through observation of stumps and equipment.
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	FME requires documented evidence of FISTA training for all logging contractors, as confirmed during review of timber sale contracts in FME offices.
4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).	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 and County employees. Right to organize is guaranteed by U.S. and State of Wisconsin Law. For all employees of contractors, the standard contract requires the contractor to comply with all applicable labor laws; as such, freedom of association is ensured. More information is available at http://oser.state.wi.us/index.asp in regards to DNR and other State employees. For both County and DNR employees, there is a dispute resolution mechanism for its employees, both union and non-union employees. More information is available at http://oser.state.wi.us/index.asp. Auditors observed displays of OSHA and labor laws in all county offices visited in 2015.
4.3.b The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.	C	
4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.	C	
4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include	C	Refer to County Forest Comprehensive Land Use Plan – Ch 300, County Forest annual work plans, County Forestry Committee meetings, WDNR Timber Sale and Public Forest Lands Handbooks, and Timber Sale Cutting Notice & Report

effects on: • Archeological sites and sites of cultural, historical and community significance (on and off the FMU; • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. A summary is available to the CB.		(Form 2460). County board meetings and forestry committee meetings in which policies for resource management and work plans are set allow for public input. County Forest Administrators are available to the public for people to provide feedback, in this way they are constantly evaluating social impacts and incorporating them into management. DNR has hired an economist who has developed county by county economic analyses of the impact of forest products industry. WCFA has been overseeing the Wisconsin County Forest Practices Study, which is evaluating many facets of forest management in the state – including social impacts.
4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.	C	County Forest Administrators respond to any stakeholder comments as they are received. No major issues other than those listed under other indicators surfaced in the last year. See below for more detail by county. • Clark: Stakeholders call regularly with concerns or questions about various management activities occurring on the county forest, parks, and campgrounds. Concerns/questions are addressed in a timely manner by county forestry & parks staff. There have been no "major issues" that have required in depth investigations since the last evaluation. • Juneau: Within the last year, ATV/UTV enthusiasts have periodically called for access throughout the Juneau County Forest. With many alternative routes, restricting access to County Forest land by ATVs and UTVs is not seen as a hindrance to riders. ATV/UTV groups have been invited to make comments and discuss access at monthly Forestry Committee meetings. Ashland, Barron, Bayfield, Chippewa, Douglas, Eau Claire, Florence, Forest, Iron, Jackson, Lincoln, Oconto, Price, Sawyer, Taylor, Washburn, and Wood Counties reported that no stakeholder comments have been received.
4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.	C	County board meetings and forestry committee meetings in which policies for resource management and work plans are set allow for public input. Adjacent land owners are contacted in cases when management activities occur near property boundaries or otherwise may affect use rights. County Forest Administrators are available to the public for people to provide feedback, in this way they are constantly

		evaluating social impacts and incorporating them into management. Forest and Florence County staff occasionally receives comments during public meetings once timber sale notices have been advertised, as confirmed through interviews with staff.
4.4.d For ***public forests,*** consultation shall include the following components: 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.	C	Refer to 4.4.b and 4.4.c. The County Forest Law establishes mechanisms for public participation in all planning processes. Annual work plans are open for public comment as advertised in local newspapers and on each County's website well before management activities take place. Appeals are dealt with prior to plans becoming finalized as to avoid any conflicts; however, the public may contact their elected county representative or present information during monthly public meetings to appeal decisions. All draft and final plans are made available in County offices and on each County's website. Specific data may be requested from county forest managers.
4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.	NE	
Principle #5: Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	NE	
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	NE	
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	NE	
5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	NE	

5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	NE	
5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	C	
5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan. The sustained yield harvest level calculation for each planning unit is based on: • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.	C	Minor changes to annual allowable harvest rate occur each year when planning is conducted for each county forest. During planning, if harvest intervals or early or late constraints are changed, the calculated annual allowable harvest will change accordingly. Additionally, if harvest dates are updated on a large amount of the property the annual allowable harvest can also be impacted. Harvest rates established using area control methods. County Forestry Committees and County Boards develop budgets annually, during which annual allowed harvest acres are considered. CF administrators can provide any documentation of Department budgets that is requested. WisFIRS Reports 36A and 37A contain stumpage value for sales completed by year. FME reported no major changes to the annual allowable harvest rate. Minor changes to annual allowable harvest rate occur each year when planning is conducted for each county forest. During planning, if harvest intervals or early or late constraints are changed the calculated annual allowable harvest will change accordingly. Additionally, if harvest dates are updated on a large amount of the property the annual allowable harvest can also be impacted.
5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	C	FME reported that 35,699 acres have been harvested since the last audit (established sale acres CY14 – rpt. 301). The long-term goal 42,134 acres annually on average (long term goal – 15 year avg.-PY14 – rpt. 303). FME reported an annual yield of ~580,000 cords equivalent (rpt. 37A – CY13-FSC only)
5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management,	C	WCFP uses standard harvest scheduling established in WisFIRS for each stand type. Future entries are based on species composition, stocking, and past management. In all counties visited a demonstration of how this system works was provided to the audit team to show how stands are being managed. A combination of moving harvests forward

or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.		and delaying harvest is being used to ensure a more balanced age class distribution over time, as well as to treat smaller stands that have been neglected in the past.
5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	C	Currently, the only significant commercial operations of NTFPs occur on counties with Sphagnum moss resources. Harvest areas and intervals are set according to data from past years that shows how quickly the resource can recover. No harvest of NTFPs was reported by counties visited in the 2015 audit.
Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.		
6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	NE	
6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of	C	The Wisconsin Natural Heritage Inventory (NHI) is consulted prior to forest management activities. Foresters work in consultation with Wildlife and Endangered Resources staff to address any occurrences. Forestry, wildlife and ER staffs often conduct additional site surveys for species if the NHI database indicates the need. The NHI system allows for reporting of any additional occurrences by a variety of staff. Impacts to RTE species are documented in timber sale files and the timber sale cutting notice (Form 2460). County staff cooperate and collaborate with Wisconsin DNR staff on upcoming timber sales during the Annual Partnership

the appropriate database.		and/or work planning Meetings and also receive additional site specific input on RTE species detection and management on a case by case basis, when needed.
6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. ***Conservation zones*** and/or ***protected areas*** are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.	C	The Wisconsin Natural Heritage Inventory (NHI) is consulted prior to forest management activities. Foresters work in consultation with Wildlife and Endangered Resources staff to address any occurrences. Forestry, wildlife and ER staffs often conduct additional site surveys for species if the NHI database indicates the need. The NHI system allows for reporting of any additional occurrences by a variety of staff. Impacts to RTE species is documented in timber sale files and the timber sale cutting notice (Form 2460).
6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.	C	As observed in Forest County, FME uses early successional habitat funds to enhance conditions for game (e.g., Ruffed Grouse and Woodcock) and 30-40 non-game (e.g. Golden Winged Warbler, a State Species of Greatest Conservation Need (SGCN)) species that depend on this cover type.
6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	Management activities that impact RTE species and habitats occur regularly. Management activities are planned and carried out with consultation from wildlife and/or endangered resources staff and using species specific guidelines applied to local conditions to mitigate potential impact to RTE species and habitats. Additionally, activities that may impact RTE species may be conducted under the authority of a broad or site specific incidental take permit as approved by the DNR. DNR Forest Rangers, LEOs and Game Wardens help manage these activities.
6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	
6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented ***successional*** stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	Assessments of under-represented, naturally occurring successional stages occur during comprehensive land use planning processes. Specific property goals for management of these areas are described in the comprehensive plan and/or in annual work plans. The DNR has developed some species specific analysis of forest cover types, which are available on the DNR webpage.

6.3.a.2 When a ***rare ecological community*** is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, ***conservation zones*** and/or ***protected areas*** are established where warranted.	C	In all counties, wetlands and around State Natural Areas (SNAs) buffers are identified on the ground to avoid equipment entry into these areas. In certain wetlands, winter harvesting is allowed and can be used to favor early successional wetland species and to maintain species composition over time. Some vernal pools have been identified by outside surveys and these sites are also identified on the ground to avoid equipment entry.
6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all ***Type 1*** and ***Type 2 old growth***. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate). Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g). On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate). On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:	C	Relict old growth stands (Type 1) are typed as reserved - no management. On any managed old-growth stand – any forest management is conducted primarily to maintain or enhance old growth characteristics. Activity since last audit - None.

1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected.		
6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.	C	DNR wildlife biologists work with liaison foresters and county forest administrators to plan and carry out projects for wildlife habitat improvement. Funding of $.05/ acre is provided to county forests by the DNR to perform habitat improvement work. Additionally, individual biologists, foresters, and county forest administrators pursue additional projects for the benefit of wildlife at a local level. Some recent examples of efforts to benefit wildlife include: Young Forest Initiative, barrens restoration and management, grouse/woodcock habitat, Kirtland's Warbler habitat, turkey habitat, etc. Projects are often conducted in partnership with other groups including ruffed grouse society, wild turkey federation, USFWS, etc.
6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent ***aquatic habitats***; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.	C	Forest management activities regularly occur near riparian areas. Wisconsin BMPs for Water Quality are followed when conducting management near riparian areas. BMP, soil disturbance, and ephemeral pond monitoring projects are conducted on county forest lands by the DNR forest hydrologist. BMP monitoring was completed in 2013 on county forest lands and a report has recently been published. This has been provided on the FTP site.
Stand-scale Indicators **6.3.d** Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.	C	The aspen coppices, single-tree selections in northern hardwoods, and pine thinnings observed in 2015 all employed silvicultural regimes consistent with regenerating the species found on the sites and adding volume to any trees retained. Retained trees typically serve as wildlife habitat, snag recruitment, seed sources, and future crop trees.
6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local	C	Seed sources predominantly come from areas around the state's two nurseries (Wi Rapids, Boscobel). Some counties send local seed sources to out-of-state nurseries to be container grown. See below for more detail by county.

sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. ***Native species*** suited to the site are normally selected for regeneration.		• Clark: Jack pine planted on the county forest 2014 was grown by a contractor with seed sourced from NW WI. Red pine planted on the county forest is supplied by a contractor that is collected from their local seed source (mostly Canada). Red Pine has very little genetic diversity across its range so seed source is a minimal concern. • Douglas: Local jack pine seed source and out of Canadian provinces for red pine seed source. We've had very successful results using Canadian origin red pine seedlings and they are the most readily available through the nursery we use. • Florence: WDNR nursery • Jackson: Red Pine from PRT in Canada • Juneau: Local seed and tree seedlings from the Wisconsin DNR State Nursery. • Lincoln: Griffith – DNR Nursery • Washburn: Jack pine seed purchased from DNR Nursery program. Seed is sourced locally • Wood: Jack pine seed from WDNR nursery program. Ashland, Barron, Bayfield, Chippewa, Eau Claire, Forest, Iron, Oconto, Price, Sawyer, and Taylor Counties reported no planting activities in 2015.
6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, ***snags***, and well-distributed coarse down and dead woody material. ***Legacy trees*** where present are not harvested; and b) vertical and horizontal complexity. Trees selected for ***retention*** are generally representative of the dominant species found on the site.	C	On most sites, auditors observed retention of large deformed or declining trees, snags, and woody debris over the site. When present, legacy trees such as older aged Eastern hemlocks were retained within harvest units, as observed in Florence and Forest Counties. For directional complexity, on clearcuts the auditors observed retention islands and individual trees or snags retained for wildlife movement. On single-tree selection sites, auditors observed snags and retained trees of various sizes.
6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when ***even-aged systems*** are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region. In the Lake States Northeast, Rocky Mountain and	C	~ 15,000-20,000 acres of even aged harvests occur annually. When even-aged harvests are conducted green tree retention guidelines, biomass harvesting and course woody debris guidelines are all followed, as observed in clearcuts.

Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.		
6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan: 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the ***best available information*** including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.	NA	There are no departures from opening size limits as described in 6.3.g.1.
6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control ***invasive species***, including: 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling	C	Prevention- Counties employ prevention practices consistent with risks posed locally by invasive species. In January of 2014 a final report was issued as part of a baseline survey for invasive species which occurred in 2012 and 2013. The survey included selected sites in seven county forests in northern Wisconsin which were surveyed for a targeted list of terrestrial invasive plant species. See below for more detail by county. • Ashland: Penn sedge treatments • Barron: Observations made during routine forest activities. No problem areas have been identified. • Bayfield: We survey for new populations in the course of timber sale establishment, timber stand recon and

invasive species.		trail work. If populations are found they are mapped and treated mechanically and/or chemically. We also actively search areas surrounding known populations for additional infestations. Once a population has been located and treated, it is monitored annually and retreated as needed. This year we treated two buckthorn and three black locust populations, both mechanically and chemically. • Chippewa: We hired the Beaver Creek Citizen Science Center to compile existing data and develop a document titled "Chippewa County Terrestrial Invasive Plants: Consolidation of Existing Inventory Data and Preliminary Management Framework". We intend (and have budgeted to hire a private herbicide applicator in 2016 to treat the sites identified in this document. We continued our ongoing efforts to contain and garlic mustard that is working to establish itself in a Pine Plantation that contains the Ice Age Trail. We believe that we have achieved containment, and continue to work on eradication via spraying with herbicide as listed in the table below. This will also be part of our future private contracting. • Clark: Clark County follows a "Clark County Forest Invasive Plant Plan" that is included in the 15 year comprehensive land use plan for the county. Foresters and other department staff monitor for invasive species year round. When found, sites are added to our invasive species GIS layer. Annually during the months of June and July the department spends 3-5 days treating invasive species focusing on high traffic areas (i.e. rec trails, forest roads, landings, etc.). Treatment information is tracked in our GIS database. Treated sites remain in the GIS database and are continually monitored. By the end of the 2014 growing season, 158 occurrences had been documented. Ten new sites were discovered in 2014. Nearly every documented invasive occurrence is associated with human vectors and most are concentrated in high use recreational areas. Herbicide treatments to control Spotted Knapweed, Leafy Spurge, Japanese Honeysuckle, Purple Loosestrife, and several others began in 2004 and continued through 2014. These treatments have helped contain the spread of invasives and reduced their intensity in the treated areas. • Douglas: Control of small pocket of Japanese knotweed. Control of Eurasian water milfoil. Biological control of spotted knapweed. Mechanical control of honeysuckle and buckthorn. Invasive monitoring continuing on an

		on-going basis through forest inventory work. • Eau Claire: The Beaver Creek Invasive species inventory project is ongoing, as reported during the last audit. • Florence: We have identified some invasives through RECON updates of stands and treated sites as they come up. Such as pulling of buck thorn and thistle. • Forest: A small parcel of garlic mustard has been mapped and monitored in the past two years. There has been two dates which garlic mustard was pulled manually and disposed of by volunteers. It was also chemically treated. Honeysuckle was identified on one active harvest site and displays in WisFIRS in the Invasives field for the harvested stand. The area will be mapped and treated at the conclusion of harvest. • Iron: Monitoring remains in conjunction with timber sale establishment and forest recon activities. There have been no control measures used as there have been no new or widespread outbreaks noted. • Jackson: Two timber sales treated for buckthorn to encourage regeneration. Monitor and controlled buckthorn east of the Black River State Forest. Control phragmites at Wazee County Park. Control gypsy moth at East Arbutus County Park. • Juneau: The spread of invasive species is limited by the continued restriction of ATVs and UTVs on the Juneau County Forest. Monitoring of invasive species occurs during forest reconnaissance and timber sale establishment activities each year. • Lincoln: GIS layer is maintained for known invasive plant occurrences. Areas are sprayed and monitored for control • Oconto: Working on updating in 15 year plan. • Price: We are always monitoring for invasive species while in the field. Buckthorn control continues in two County Parks. • Sawyer: Monitor and assess invasives and exotics on all stands where recon has been updated during the past year, approximately 6,500 acres. • Taylor: Taylor County Forest was approved for a Sustainable Forestry Grant for an intensive invasive species inventory. The inventory is being conducted by representatives of Beaver Creek Reserve and we are expecting the results and recommendations this fall. • Washburn: Monitoring of buckthorn control sites from 2013 plus identification of additional sites for treatment in 2015 • Wood: Stands containing buckthorn are recorded in

		WisFIRS through routine recon updates. Operational considerations are incorporated in upcoming harvests by including BMP's for invasive species in contract. Hired contractor to treat buckthorn infested stand (approximately 24 acres) with Garlon herbicide.
6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	Records for County Forests in particular are not readily available centrally but these numbers are statewide: The following numbers are statewide 2014 calendar year so far: http://dnr.wi.gov/topic/ForestFire/report.asp Wildfires – 811 fires have burned ~2,355.2 acres to date in Wisconsin.
6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.	NE	
6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	NE	
6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.	NE	
6.7. 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.	NE	
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	NE	
6.9. The use of exotic species shall be carefully	C	

controlled and actively monitored to avoid adverse ecological impacts.		
6.9.a The use of ***exotic species*** is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	Exotic species are not used on the FMUs for commercial or management purposes other than a WDNR seed mix used in erosion control. WDNR did an analysis of the risk of using this seed mix as part of its FSC audit several years ago. County staff follow the guidelines from this evaluation, which indicated low risk of invasiveness and low risk of establishment of a seed bank. The Wisconsin BMP manual for water quality includes a section on the use of non-native grass seed mixes (Appendix D).
6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	FME reported that no exotic species have been used for commercial or management purposes other than as described in 6.9.a. Use of grass seed mixes is included as options in timber sale narratives, which includes the location. Origin of grass seed is recorded as part of purchases by counties. Typically, seed mixes are purchased through or given by the DNR Bureau of Wildlife, which maintains information on provenance.
6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species.	C	No adverse impacts have been observed through the use of grass seed mixes that have exotic species, as confirmed through interviews with FME staff and observations in the field of white clover. In areas where white clover was planted two years ago, native species have seeded in and overtaken the clover.
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 Forest *conversion* to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	Documentation of any forests to non-forest use is maintained by County Forest Administrators. WCFP consists of all natural forests (including planted natural forests) and no FSC plantations. Counties have not conducted any conversion of forestland to non-forest use. As confirmed during interviews and field observation (e.g., Forest County), no conversion is taking place on the county forests visited in 2015. Gravel pits do not qualify as conversion per the applicability notes described for 6.10 in the FSC-US standard. Gravel mines are used to rock forest

		roads and are eventually reclaimed as forest or non-forest habitat when the gravel resource has been exhausted from a site.
6.10.b Forest *conversion* to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	No conversion has taken place, as confirmed through interviews with FME staff and field observation.
6.10.c Forest *conversion* to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	No conversion has taken place, as confirmed through interviews with FME staff and field observation.
6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.	C	No conversion of natural/semi-natural stands to non-forest use was not reported or observed during the 2015 assessment.
6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)	C	Chapter 515 of each county's CLUP contains a description of special uses that may or may not entail conversion. Where conversion is necessary to access the resource, such as in the case of sand and gravel mining, CLUPs contain information on reclamation or that land may be withdrawn from the County Forest Law Program. Stand-types and desired or expected trajectories are described in the CLUP. Where disease is a concern, stand-types may be converted.
6.10.f Areas converted to *non-forest use* for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.	C	No OGM rights were reported to be in exercise currently. Counties usually seek to acquire subsurface rights when acquiring new lands. OGM rights may expire in many areas when the rights holder does not exercise the rights within 20 years. Chapter 515 of each county's CLUP contains a description of special uses that may or may not entail conversion, including access to subsurface OGM rights. Where conversion is necessary to access the resource, CLUPs contain information on reclamation or that land may be withdrawn from the County Forest Law Program.
Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be		

clearly stated.		
Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.		
8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	C	
8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.	C	Most of the required monitoring is part of the forest compartment reconnaissance (recon), described in detail in the WDNR Public Forest Lands Handbook 2460.5. WisFIRS provides a system for recording monitoring information per DNR-established protocols. Other elements of the monitoring system include field manuals for forest inventory (reconnaissance), and studies commissioned by DNR, the legislature or other bodies. Monitoring strategy is described WDNR Public Forest Lands Handbook Ch 100 and recorded in WisFIRS.
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	FME reported an annual yield of ~580,000 cords equivalent (rpt. 37A – CY13- FSC only). FME reported that it completed CY 2014 - 138,529 acres of timber stand reconnaissance.
8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	Forest County prosecuted an incident of timber theft within the past four years. Records of the amount of theft are maintained in county and court.
8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	As confirmed through a review of 2460 forms and WisFIRS, FME maintains records of all harvested materials. Records allow county and DNR staff to compile annual reports on harvest amounts and acreage to adhere to C5.6. FIA data is also used and the DNR Inventory Specialist helps to

		correlate to the County area based control.
8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: 1) Rare, threatened and endangered species and/or their ***habitats***; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4).	C	Wildlife Surveys: Nesting bird surveys, grouse transects, fawn/doe surveys, summer deer observations, winter track surveys, bear surveys, turkey and pheasant brood surveys, and a variety of other wildlife and plant monitoring. Forest Health Monitoring which includes gypsy moth and EAB surveys. In January of 2014 a final report was issued as part of a baseline survey for invasive species which occurred in 2012 and 2013. The survey included selected sites in seven county forests in northern Wisconsin which were surveyed for a targeted list of terrestrial invasive plant species.
8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.	C	County and DNR foresters indicated that they visit active harvest operations several times a week; assessment forms are in writing and were inspected during the field audit (attached to timber sale documentation). Statewide BMP monitoring report for water quality for data collected in 2013 was release just prior to this audit in 2015.
8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	BMP monitoring for water quality, soil disturbance monitoring, vernal pond monitoring. Report on 2013 County Forest BMP monitoring recently published. WCFA has been the steward of the WI Forest Practices Study over the past 2 years.
8.2.d.3 The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	FME relies on data collected by DNR and WCFA for monitoring socioeconomic issues related to forest management. The DNR Division of Forestry webpage contains county by county economic analysis/impact of forest management in Wisconsin, which employs 2012 data to model the economic impacts of the forest industry in Wisconsin as a whole and for each individual county using the Impact Analysis for Planning (IMPLAN). http://dnr.wi.gov/topic/ForestBusinesses/factSheets.html
8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.	C	See C4.4 for a county-by-county report on stakeholder interactions. Meeting minutes with the public and Citizen Advisory Council serve as a record of stakeholder interaction.
8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	Communication with tribal representatives is on-going, assuring that any opportunities for joint monitoring of cultural sites are made available to tribes. During interviews with staff in 2015, it was found that most sites are protected by the tribes themselves and that they express little interest in informing FME staff on exact locations of tribal resources.
8.2.e The forest owner or manager monitors the costs and revenues of management in order to	C	Quarterly and annual accomplishment reports show progress throughout the year for various work goals (timber

assess productivity and efficiency.		sale establishment, reforestation, etc.). Timber sale inspections monitor at sale level; timber sale forms contain information on how much each sale was appraised and sold for.
8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	NE	
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	NE	
8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	NE	
Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach. **High Conservation Value Forests are those that possess one or more of the following attributes:** **a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance** **b) Forest areas that are in or contain rare, threatened or endangered ecosystems** **c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)** **d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).**		
9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	C	
9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F. Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.	C	See response to OBS 2014.3. FME consults various WDNR sources, such as NHI data and plant community mapping information. FME utilizes the experience and expertise of WDNR staff on the presence of RTE species and communities (e.g., State Natural Areas). WDNR Timber Sale Handbook 2461 contains codes that are used to denote community types that qualify as HCVF. FME's county administrator maintains an Excel spreadsheet with all HCVs by the six types per county. WDNR maintains a crosswalk that compares state-level terminology to HCV types. Gumm Bog was viewed in WisFIRS and is noted as being omitted from harvest.

9.1.b In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.	C	The HCVF assessment is done in consultation with Wisconsin DNR. In that assessment, many experts, community members and specialists are consulted during the process. Records are included in management plans, annual work plans, and county meeting minutes.
9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	This is available in the management plans (CLUP) for the Counties that were visited in 2015; see chapters 530 and 850 of all county CLUPs.
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	C	
9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.	C	Wisconsin DNR and other stakeholders are consulted to determine HCVF locations and their attributes. Records are included in management plans, annual work plans, and county meeting minutes.
9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	C	County Forest management planning documents regarding HCVF classification are open to public review through public meetings, County websites, and the Citizen Advisory Committee. Records are included in management plans, annual work plans, and county meeting minutes.
9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	C	
9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.	C	Each HCVF is identified in the Master Plan (CLUP) and a written description along with management objectives is provided.
9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	C	The Counties work with Wisconsin DNR to determine and to apply the appropriate management activities that should occur in each HCVF. These include methods to protect species habitat characteristics (e.g., nest sites) or to maintain rare habitats, such as by burning, as described in the CLUP and annual work plans.
9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes	C	No HCVs that cross ownership boundaries were observed or reported in the 2015 audit.

would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.		
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	Periodic recon updating and targeted monitoring visits to some HCVFs each year as needed. In 2014 field season a contracted (UW-Superior) biological survey team completed *relevé* plot sampling across HCVFs to establish some baseline vegetation monitoring data.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	The biggest issues affecting HCVs involve invasive species. Counties regularly check these areas and report any increases in invasive species presence. Usually mechanical, hand-pulling or chemical treatment is used. No unusual increasing risks were noted in 2015.
Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.		

Appendix 6 – Chain of Custody Indicators for FMEs

[X] Chain of Custody indicators were not evaluated during this annual audit.