

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

Wisconsin Department of Natural Resources Managed Forest Law Tree Farm Group

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SCS-FM/COC-004622

CERTIFIED	EXPIRATION
02/Dec/2013	01/Dec/2018

DATE OF FIELD AUDIT
9-13/June/2014
DATE OF LAST UPDATE
31/July/2014

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Foreword

Cycle in annual surveillance audits			
<input checked="" type="checkbox"/> 1 st annual audit	<input type="checkbox"/> 2 nd annual audit	<input type="checkbox"/> 3 rd annual audit	<input type="checkbox"/> 4 th annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
Wisconsin Department of Natural Resources, Managed Forest Law Tree Farm Group (MFL)			

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:	Lead FSC Auditor
Qualifications:	<p>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.</p>		
Auditor Name:	Norman Boatwright	Auditor role:	Lead ATFS Auditor
Qualifications:	<p>Norman Boatwright is the president of Boatwright Consulting Services, LLC located in Florence, South Carolina. BCS handles typical forestry consulting, SFI, ATF and FSC Audits, Phase I Environmental Site Assessments, Forest Soil Mapping, Wetland Delineation, and other Biological Services. Norman has over twenty-nine years' experience in intensive forest management, eighteen years' experience in environmental services and ten years' experience in forest certification auditing. He has conducted Phase I Assessments on over three hundred and fifty projects covering 3,000,000 acres, Endangered Species Assessments on timberland across the South, and managed soil mapping projects on over 1.3 million acres. From 1985-1991, he was Division Manager at Canal Forest Resources, Inc. and was responsible for all forest management activities on about 90,000 acres of timberland in eastern South Carolina. Duties included budgeting and implementing land and timber sales, site preparation, planting, best management practices, road construction, etc. From 1991-1999, he was manager of Canal Environmental Services which offered the following services: Phase I Environmental Site Assessments, Wetland Delineation and Permitting and Endangered Species Surveys. From 1999-2012 he was the Environmental Services Manager Milliken Forestry Company. Norman has extensive experience auditing SFI, procurement and land management organizations and American Tree Farm Group Certification Programs. He is also a Lead Auditor for Chain of Custody Audits under SFI, PEFC, and FSC.</p>		
Auditor Name:	Anne Marie Kittredge	Auditor role:	Assistant FSC/ATFS auditor
Qualifications:	<p>Anne Marie Kittredge is a Forest Management Lead Auditor with experience conducting audits for large and small private and public landowners. Anne Marie also conducts Lead Auditor Chain of Custody audits under the SFI, FSC and PEFC Standards,</p>		

	<p>is qualified as a Lead Auditor (ISO 19011) and has authored >500 reports for a broad range of landowners, manufacturers, distributors and brokers. Anne Marie has > 20 years of experience in traditional forest management, wildlife habitat management, marketing and utilization and forest cutting practices regulations. Anne Marie's experience as a state forester in Massachusetts focused on management of FSC certified state-owned forest lands, forest cutting practice regulation enforcement as well as private landowner assistance and current use certification administration. Anne Marie earned both MS and BS in Forestry from the University of Massachusetts in Amherst.</p>		
Auditor Name:	Tucker Watts	Auditor role:	Assistant FSC/ATFS auditor
Qualifications:	<p>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, distributors, and audits of recovered fiber and recycled content.</p>		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	5
B. Number of auditors participating in on-site evaluation:	3
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
D. Total number of person days used in evaluation:	18

1.3 Standards Employed

1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC-US Forest Management Standard	V1-0	8 – July – 2010
FSC standard for group entities in forest management groups (FSC-STD-30-005)	V1-0	31 – August – 2009
<p>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).</p>		

1.3.2. SCS Interim FSC Standards

Title	Version	Date of Finalization
SCS FSC Chain of Custody Indicators for Forest Management Enterprises	V5-1	3 – 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

8 – June – 2014	
FMU/Location/ sites visited	Activities/ notes
Opening meeting Southern team – Meister (Auditor 1) and Kittredge (Auditor 2)	Auditor 1 and 2: Opening Meeting: Introductions, client update, review audit scope, audit plan, intro/update to FSC and SCS standards and protocols,
9 – June – 2014	
FMU/Location/ sites visited	Activities/ notes
Southern team – Meister (Auditor 1) and Kittredge (Auditor 2)	Auditor 1: Introductions, Waukesha County – Southern Kettle Moraine SF (MFL Order #s 68-005-1999, 68-002-2003, 68-001-2001, 68-012-1993, and 68-004-1995); and review of open CARs/OBS. Harvest types reviewed included conifer thinnings, shelterwood removal, group selection, and single-tree selection. Other management practices reviewed included riparian protection measures, property boundary maintenance, road BMPs, prescribed burns, invasive species control, and understory planting.
	Auditor 2 Ozaukee County – Pike Lake Unit of KTSF (MFL Order #s 46-002-1994, 46-005-1995, 46-002-2007, 46-002-2013&46-002-2013, 46-010-1996); and review of open CARs/OBS. Harvest types reviewed included conifer thinnings, group selection, single-tree selection, salvage and pre-salvage (for EAB and Larch pathogen). Other management practices reviewed included riparian protection measures, RTE protection, archeological site protection, wildlife habitat enhancement prescriptions, property boundary maintenance, road BMPs, prescribed burns and fire breaks, invasive species control, walnut stand management, recreation and planting and supplemental understory planting. Discussions included the use of out-of-date Cutting Notice forms, archeological sites not yet documented in the management plans, the requirement for mapping wetland resource areas and the need to more completely describe and implement NHI mitigation measures.
Northeast team – Boatwright (Auditor 1) and Watts (Auditor 2)	Auditor 1 Waushara County (MFL Order #s 70-009-2004, 70-010-2004, 70-002-2008, 70-011-2002, 70-010-2009, and 70-010-2015).

	<p>Harvest types and activities observed included conifer thinnings, salvage post-windstorm, scotch pine removal and planting with native conifers, conifer pruning, oak release. Also completed a review of management plans, cutting notices, cost-share requests, stocking measurements, and BMPs.</p> <p>Auditor 2: Introduction, Kewaunee County – Francis Gilson (31-010-2012), Thomas Grovogel (31-002-2010), Eric Nell (31-009-200), Ray and Wayne Heim (31-006-2000), Myron Stepanek (31-010-1997), Cheryl Jerabek (31-003-1996)</p> <p>Harvest types reviewed include single tree selection, GAP harvesting for regeneration, and row thinning. Other management practices include management of MFL Program and Cutting Notices, planting and associated cultural practices, retention of wildlife trees, and protection of threatened and endangered species.</p>
10 – June – 2014	
FMU/Location/ sites visited*	Activities/ notes
<p>Southern team – Meister and Kittredge</p>	<p>Auditor 1 Waukesha County day 2 (MFL Order #s 68-001-2002, 68-003-2007, 68-002-2007, and 68-003-1992).</p> <p>Harvest types reviewed included conifer thinnings. Other management practices reviewed included prescribed burns, invasive species control, property boundary maintenance, walnut stand management, and recreation. After site visits were completed, all plans for sites visited in Waukesha County were reviewed on WisFRS (data and project management system). Discussions included the use of out-of-date Cutting Notice forms, the need to more completely describe and implement NHI mitigation measures.</p> <p>Auditor 2 Ozaukee County day 2 (MFL Order #s 46-007-1999, 46-010-1993, 46-007-1995, 46-004-1998, 46-008-1994).</p> <p>Harvest types reviewed included conifer thinnings, hardwood thinnings, TSI, crop tree release, group selection, single-tree selection, salvage and pre-salvage (for EAB). Other management practices reviewed included riparian protection measures, RTE protection, wildlife enhancement prescriptions, property boundary maintenance, road BMPs, invasive species control, walnut stand management, recreation and understory planting.</p>
<p>Northeast team – Boatwright and Watts</p>	<p>Auditor 1 Waushara County day 2 (MFL Order #s 70-001-2008; 70-051-1994; 70-001-2012; 70-008-2007; 70-068, 70-069-, 070-1995; and 70-011-2005).</p> <p>Harvest types reviewed included oak overstory removal as part of second cut of the shelterwood regeneration system in a stand with significant advanced oak regeneration that was not destroyed during the harvesting operation; aspen regeneration cut with single-tree retention of oak/ cherry; conifer thinnings; removal/ treatment of</p>

	<p>black locust; conifer regeneration cut; and salvage post-windstorm with single-tree retention. A review of management plans, cutting notices, management recommendations, and BMPs was also completed.</p> <p>Auditor 2 Kewaunee County day 2 –Peco Oaks (31-013-1992), Donna Jandrain (31-019-1992), Jim Steffel (31-012-1996), Alvin Steffel (31-002-2002), Robert G. and Scott J. Hendricks (31-003-2004 File Only)</p> <p>Harvest types reviewed include single tree selection, and GAP harvesting for regeneration. Other management practices include management of MFL Program and Cutting Notices, retention of wildlife trees, harvesting of maple sap, and protection of threatened and endangered species.</p>
11 – June – 2014	
FMU/Location/ sites visited*	Activities/ notes
<p>Southern team – Meister and Kittredge</p>	<p>Auditor 1 Rock County – (MFL Order #s 54-005-2004, 54-011-1996, 54-015-1995, 54-013-1993).</p> <p>Harvests types reviewed included single-tree selection and single-tree selection with removal of overstory and midstory ash, basswood and elm to free growing space for desirable species of oak and walnut. After site visits were completed, plans for sites visited on day one in Rock County were reviewed on WisFRS (data and project management system). Other management activities reviewed included property boundary maintenance. Discussions held on high-grading and heavy removal of merchantable volumes without first securing regeneration.</p> <p>Auditor 2 Green County – Fish Hatchery Office Fitchburg, WI (MFL Order #s 23-001-2012, 23-007-1992, 23-001-2000, 23-006-2002, 23-007-1995); and review of open CARs/OBS.</p> <p>Harvest types reviewed included conifer thinnings, group selection, single-tree selection, salvage and pre-salvage (for EAB and Larch pathogen). Other management practices reviewed included riparian protection measures, RTE protection, archeological site protection, wildlife habitat enhancement prescriptions, property boundary maintenance, road BMPs, invasive species control, walnut stand management, recreation and planting and supplemental understory planting. Discussions included the use of out-of-date Cutting Notice forms, the requirement to more completely describe and implement NHI mitigation measures.</p>
<p>Northeast team – Boatwright and Watts</p>	<p>Auditor 1 Outagamie County (MFL Order #s 45-019-2000, 45-005-2010, 45-005-2011, 45-019-2005, and 45-015-2000).</p> <p>Harvest types reviewed included single-tree and group selection in northern and bottomland hardwoods; aspen regeneration cut with vernal pool buffers; aspen regeneration cut; and northern hardwood</p>

	<p>thinning. A review of management plans, cutting notices, management recommendations, stocking measurement, and BMPs was also completed.</p> <p>Auditor 2 Brown County day 1 – Peter Novotny (05-008-1993), Francis Rabas (05-003-2004), Clint Rau (05-007-2013), James Michiels (05-004-2014), John Kuffel (05-007-2001)</p> <p>Harvest types reviewed include single tree selection, and GAP harvesting for regeneration. Other management practices include management of MFL Program and Cutting Notices, planting, retention of wildlife trees, control of invasive species, harvesting of MFL and non-MFL properties, RMZ protection, and protection of threatened and endangered species.</p>
12 – June – 2014	
FMU/Location/ sites visited*	Activities/ notes
<p>Southern team – Meister and Kittredge</p>	<p>Auditor 1 Rock County day 2 (MFL Order# 54-010-1993, 54-011-2000, 54-006-1998, 54-020-2001, and 54-006-2005).</p> <p>Harvest types reviewed included group selection, single-tree selection, and thinning. Other management activities reviewed included property boundary maintenance, sugarbush management, and invasive species control. Discussions held on high-grading and heavy removal of merchantable volumes without first securing regeneration.</p> <p>Auditor 2 Green County day 2 (MFL Order #s 23-005-2003, 23-001-2007, 23-027-1994, 23-006-2002, 23-003-1997); and review of open CARs/OBS.</p> <p>Harvest types reviewed included conifer thinnings, hardwood things, group selection, single-tree selection, shelterwood removal, TSI, salvage and pre-salvage (for EAB and Larch pathogen). Other management practices reviewed included riparian protection measures, RTE protection, archeological site protection, wildlife habitat enhancement prescriptions, property boundary maintenance, road BMPs, invasive species control, walnut stand management, recreation, planting and supplemental understory planting. Discussions included the use of out-of-date Cutting Notice forms, the need to more completely describe and implement NHI mitigation measures.</p>
<p>Northeast team – Boatwright and Watts</p>	<p>Auditor 1 Outagamie County day 2 (MFL Order #s 45-008-1996, 45-010-2006, 45-009-1990, 45-027-1994, and 45-017-1990)</p> <p>Harvest types reviewed included intermediate cuts in bottomland and northern hardwood; oak and northern hardwood intermediate cut; aspen removal from red pine stand; conifer thinnings; and salvage post-tornado. A review of management plans, cutting notices, management recommendations, stocking measurements,</p>

	<p>and BMPs was also completed.</p> <p>Auditor 2 Brown County day 2 – Michael Williquette (05-009-1995), Gary Posey (05-005-2002), Gary Posey (05-010-1995), Ronald Williams (05-007-1996), Paul Lemke (05-002-2000 File Only)</p> <p>Harvest types reviewed include single tree selection, GAP harvesting for regeneration, and row thinning. Other management practices include management of MFL Program and Cutting Notices, retention of wildlife trees, RMZ protection, stabilization of crossings and banks, harvesting of MFL and non-MFL properties, and protection of threatened and endangered species and archeological sites.</p>
13 – June – 2014	
FMU/Location/ sites visited*	Activities/ notes
Southern team – Meister	<p>Audit central office systems, State Natural Resources Offices 101 S. Webster St, Madison, WI (Conference call with Green Bay Service Center)</p> <p>Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm audit findings</p> <p>Closing Meeting and Review of Findings: Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps</p>
Northeast team – Boatwright	<p>Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm audit findings</p> <p>Closing Meeting and Review of Findings by conference (Green Bay Service Center): Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps (Conference call with State Natural Resources Offices)</p>

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

- A. The group membership has changed due to:

1. Expired MFL orders that owners chose not to renew.
 2. MFL re-enrollments and new enrollments.
 3. Voluntary requests for removal from the certified group.
 4. Enforcement of group policies which resulted in removal from the certified group.
- B. In addition, group policies have been updated and are reflected in a revised DNR Forest Tax Law Handbook. The revised handbook was provided to the audit team.
- C. No changes to products or species.
- D. There have been numerous DNR forestry staff changes due to retirements, new hires, promotions, and transfers.

None of these changes were considered significant to warrant a change in the scope of the certificate and did not significantly affect conformance to FSC requirements. The audit team examined group records for updates to membership, training, ownership, stand data, cutting notices, management plan updates, monitoring visit records, completed management practices, maps, and yield taxes. Records for the 2014 internal audit were also reviewed.

4. Results of the Evaluation

4.1 Existing Corrective Action Requests and Observations

Finding Number: 01	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU): All	
Deadline	<input checked="" type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS FSC Chain of Custody Indicators for Forest Management Enterprises, Version 5-0; Requirement 2.3 (based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2)
Non-Conformity: Contracts and shipping documents between landowner and log purchaser do not include an FSC claim. Evidence: <ul style="list-style-type: none"> - Contracts viewed by audit team in Marinette County) - WI DNR CoC Procedures in Forest Tax Handbook, Chapter 21-13 C lack requirement for including FSC Claim. 	
Corrective Action Request: Evidence of corrective action and conformance with applicable requirements must be submitted by the deadline stated above.	

<p>FME response <i>(including any evidence submitted)</i></p>	<ol style="list-style-type: none"> 1. The Cutting Notice and Report of Wood Products from Forest Crop and Managed Forest Lands from (2450-032) has been modified to include the statement that “All harvested products are FSC 100%.” See the public web site at http://dnr.wi.gov/topic/ForestLandowners/documents/2450032.pdf. 2. The Forest Tax Law Handbook, Chapter 21-13 is being updated to require that the FSC claim that wood is FSC 100% is to be included on all timber sale prospectuses, timber sale contracts, shipping documents and invoices if the landowner or purchaser intends to market harvested products as certified. 3. Wisconsin Woodland Owners Association (WWOA) will be updating their sample timber sale to include claims of FSC 100%. The additional wording in blue (see below) would be inserted into the sample timber sale contract. <p>FOREST CERTIFICATION (if applicable)</p> <p>50. CERTIFICATION STANDARD AND CERTIFICATE. The land management area encompassed by this timber sale is certified to the following forest certification standards (mark as applicable and provide valid certificate numbers):</p> <p style="text-align: center;"> <input type="checkbox"/> American Tree Farm System (ATFS) Certificate # _____ <input type="checkbox"/> Forest Stewardship Council (FSC) Certificate # _____ Wood sold under FSC is claimed to be FSC 100%. <input type="checkbox"/> Sustainable Forestry Initiative (SFI) Certificate # _____ <input type="checkbox"/> _____ (Other Standard) Certificate # _____ </p>
<p>SCS review</p>	<p>December 2013: Of the three actions that MFL describes, only action 1 has been completed, which includes the FSC claim as required. The other two are in draft form and require updating (i.e., certificate codes) and approval. However, since the “Cutting Notice and Report of Wood Products from Forest Crop and Managed Forest Lands from (2450-032)” accompanies all timber sales, MFL has ensured that the FSC claim is mentioned in sales records. As such, this CAR is closed.</p> <p>June 2014: The other two actions described were completed and have been approved. An updated Forest Tax Law Handbook was developed. See www.wisconsinwoodlands.org/pdf/TimbSaleWord2013.doc under http://www.wisconsinwoodlands.org/resources.php for more information.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 02	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU): All	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	2.2.b
<p>Observation Background: Per the requirements of Indicator 2.2.b and 3.2.a, there is an opportunity for the MFL program to improve consultation with the Chippewa Tribes regarding off-reservation hunting and fishing rights. This finding is based on audit stakeholder consultations with a representative from the Great Lakes Indian Fish and Wildlife Commission (GLFWC), who communicated a desire for additional consultation efforts specific to forest management on MFL properties as it relates to Chippewa hunting and fishing rights. The SCS audit team, DNR, and GLFWC all recognize the challenge of consulting directly with MFL property owners regarding Chippewa hunting and fishing rights. Furthermore, the Note in Indicator 3.2.a. of the FSC standard recognizes this challenge.</p> <p>Note from FSC US Standard Guidance: <i>For family forests that meet the eligibility requirements of having a small forest, direct consultation between small private landowners and tribal representatives is encouraged but may not be feasible. Instead, small landowners may rely on consultation between appropriate state and federal agencies and tribes and then abide by the outcome of those government to government negotiations or settlements.</i></p> <p>Given the recognized challenge and the existing consultation mechanisms described below, the audit team concludes there is sufficient consultation to justify conformance with Indicators 2.2.b and 3.2.a. However, this Observation has been issued to encourage additional consultation.</p> <p>WI DNR uses a variety of mechanisms to consult with the six federally recognized Chippewa tribes regarding forest management and off-reservation hunting rights. These mechanisms include designating individual tribal liaisons to consult with each Chippewa tribes on forestry related topics including MFL, specific inclusion and communications with Great Lakes Indian Fish and Wildlife Commission on important forestry management protocols (e.g., biomass harvest guidelines, BMPs for water quality, Invasive Species BMPs, Silviculture Handbook, and Forest Management Guidelines). In addition, all Chippewa tribes were consulted on the Division of Forestry’s “Strategic Direction”. Finally, Chippewa tribes participate in the following DNR management committees that relate to forest and wildlife management:</p> <ul style="list-style-type: none"> A) The Wild Plant Management and Policy Committee (WPMPC) B) Wildlife Management Committees for: <ul style="list-style-type: none"> (1) Bear (2) Deer (3) Elk (4) Furbearer (5) Invasives (6) Marten Advisory 	

<p>(7) Migratory Game Bird (7) Pheasant (8) Prairie Grouse (9) Ruffed Grouse / Woodcock (10) Turkey (11) Upland Small Game (Sub-committee of Pheasant Committee) (12) Wildlife Health (13) Wolf</p>	
<p>Observation: The MFL should work with GLIFWC to improve consultation opportunities related to executing hunting and fishing rights on open MFL lands in the Ojibwe ceded territory.</p>	
<p>FME response (including any evidence submitted)</p>	<p>DNR agrees with the findings that mechanisms are in place to consult with the Great Lakes Indian Fish and Wildlife Commission (GLIFWC) and the Chippewa tribes regarding off-reservation hunting and fishing rights and broad forest management guidance, including guidance for biomass harvest, BMPs for water quality, BMPs for invasive species, and timber type management guidance, and is therefore in compliance with FSC Indicator 2.2.b.</p> <p>Consultation for specific forest management practices on each MFL property has been difficult since there is an annual average of 955 new MFL applications for the counties within the ceded territory (based on the number of applications received from 2009 through 2013). Landowners who enroll under the MFL program determine land management goals, including the target timber type. Many landowner decisions regarding the target timber type are based on current successional trends (lowers the landowner’s expense of maintenance or conversion), the landowner’s desire to maintain or improve wildlife habitat (enhances the landowner’s hunting or wildlife watching opportunities), and the landowner’s desire to maintain aesthetics (enhances the landowner’s visual pleasure and appreciation of the natural world) among other reasons. Certified plan writers help landowners determine their management goals when developing an application for enrollment into MFL and in developing the management plan.</p> <p>Broad management guidance is available to help landowners determine management goals, including the following. Certified plan writers generally identify for landowners areas and opportunities to enhance natural communities and under-represented timber types.</p> <ul style="list-style-type: none"> • Ecological landscapes of Wisconsin at http://dnr.wi.gov. Search <i>ecological landscape</i>. Click on the link. The information on these web pages can be used to identify the best areas in Wisconsin to manage for different natural communities, key habitats, aquatic features, and native plants and animals from an ecosystem management perspective. The link to the ecological landscape is included in the landowner’s management plan. • Young Forest Initiative at http://dnr.wi.gov. Search <i>young forest initiative</i>. Click on the link. The Young Forest Initiative was introduced to DNR Foresters and Certified Plan Writers at the 2013 MFL Recertification Sessions to encourage the management of young forests as a way to

	<p>improve habitat for certain wildlife species. One Young Forest Initiative target area includes Lincoln, Langlade, Oneida, Taylor, Price and Rusk counties, which are within the ceded territory.</p> <p>DNR agrees that additional discussions with GLIFWC and the tribe should be enhanced, so the following actions are being pursued:</p> <ul style="list-style-type: none"> • DNR tribal liaisons will contact each tribe and ensure that they are aware of the open lands website for FCL and MFL-Open lands at http://dnr.wi.gov. Search <i>MFL open land</i>. This web site shows which lands are available for public access on Managed Forest Land (MFL) and Forest Crop Land (FCL). <ul style="list-style-type: none"> ○ MFL - hunting, fishing, hiking, cross-country skiing and sight-seeing. ○ FCL - hunting and fishing. • Continue discussing management of forest land with the tribes. <p>Responses received so far include the following. Other responses are expected in the near future.</p>													
<table border="1"> <thead> <tr> <th data-bbox="440 871 630 909">Tribe</th> <th data-bbox="630 871 841 909">Issue</th> <th data-bbox="841 871 1438 909">Other Information</th> </tr> </thead> <tbody> <tr> <td data-bbox="440 909 630 1549">Sokaogon Chippewa Community</td> <td data-bbox="630 909 841 1549">Open Lands</td> <td data-bbox="841 909 1438 1549"> Response from Sokaogon Chippewa Community: “The Sokaogon Chippewa Community and our staff have an excellent working relationship with you and the other staff (Law Enforcement, Forestry, Fire Control and Fisheries) at WDNR. The informational and Educational discussions that you and other staff Provide are exceptional. Miigwech for this information and look forward to Continued discussions in the future.” </td> </tr> <tr> <td data-bbox="440 1549 630 1801">La Courte Oreilles</td> <td data-bbox="630 1549 841 1801">Draft Management Plan for Uhrenholdt Memorial Demonstration Forest</td> <td data-bbox="841 1549 1438 1801">Materials dropped off asking for consultation on forest use and to announce the start of the 21 day comment period. No response heard at the time of this writing.</td> </tr> <tr> <td data-bbox="440 1801 630 1862">Stockbridge-Munsee</td> <td data-bbox="630 1801 841 1862">Open Lands</td> <td data-bbox="841 1801 1438 1862">Meeting scheduled with tribe on June 18. MFL Open lands</td> </tr> </tbody> </table>	Tribe	Issue	Other Information	Sokaogon Chippewa Community	Open Lands	Response from Sokaogon Chippewa Community: “The Sokaogon Chippewa Community and our staff have an excellent working relationship with you and the other staff (Law Enforcement, Forestry, Fire Control and Fisheries) at WDNR. The informational and Educational discussions that you and other staff Provide are exceptional. Miigwech for this information and look forward to Continued discussions in the future.”	La Courte Oreilles	Draft Management Plan for Uhrenholdt Memorial Demonstration Forest	Materials dropped off asking for consultation on forest use and to announce the start of the 21 day comment period. No response heard at the time of this writing.	Stockbridge-Munsee	Open Lands	Meeting scheduled with tribe on June 18. MFL Open lands		
Tribe	Issue	Other Information												
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Stockbridge-Munsee	Open Lands	Meeting scheduled with tribe on June 18. MFL Open lands												

			information provided to tribe by e-mail.
	Menominee	Open Lands	Meeting with tribe held on May 21, 2014. MFL Open lands information provided to tribe by e-mail.
	Red Cliff	Open Lands	Discussions regarding the MFL-Open and FCL lands were held with the tribes. DNR believes that there is a positive relationship between DNR Forestry and the tribe.
	Bad River	Open Lands	Discussions regarding the MFL-Open and FCL lands were held with the tribes. DNR believes that there is a positive relationship between DNR Forestry and the tribe.
	Lac du Flambeau	Open Lands	DNR Forestry liaison discussed the open lands web Site on June 6 when he met with the NR Director and their wildlife specialist. This fall the LdF registration station will post the link and let members know about it. DNR explained that not all MFL land is open, which was news to them.
SCS review	DNR has made efforts to communicate with the tribes using multiple methods, including in-person meetings. The meetings allowed for DNR to receive feedback from the tribes on a number of issues, including how to access Open MFL lands for exercising hunting rights. All Open MFL lands can be found at http://dnrmaps.wi.gov/opfl .		
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)		

Finding Number: 03
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation
FMU CAR/OBS issued to Group Manager and MFL Group Members within the Chippewa ceded territory

Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):		
FSC Indicator:	4.2.b		
Observation Background: In counties of Lafayette and Dodge several of the selected audit sites were logged by the MFL landowner, and not by a trained logger. When the landowner conducts his/her own logging, the MFL program has little capability to ensure a safe work environment. The audit did not uncover any safety violations, thus, this is issued as an Observation.			
Observation: The WI DNR should consider efforts to improve safety when properties are being logged by a landowner who is not a trained logger.			
FME response <i>(including any evidence submitted)</i>	Partner		Other Information
	Kickapoo Valley Reserve Contact Person <ul style="list-style-type: none"> • Ken Lallemont • Lisa Marmel 		<ul style="list-style-type: none"> • Level 1 and 2 classes offered Spring and Fall • Level 1 cap is 15 students • Level 2 cap is 10 students • Classes are always full • Counties served include Grant, Vernon, Richland, Crawford, Monroe, La Crosse  Chainsaw safety KVR.pdf
	Aldo Leopold Foundation Woodland School		<ul style="list-style-type: none"> • Level 1-4 classes are offered annually • Cap per class is 10 students • Classes are always full • Serves primarily central and southern Wisconsin, but students come from all over • Typical student – <ul style="list-style-type: none"> ○ older men who have experience sawing and know that they're doing it wrong; may know of someone who has had a recent accident ○ younger land management professionals  Woodland School Annual Report_Final_
Forest Industry Safety & Training Alliance (FISTA)		<ul style="list-style-type: none"> • Level 1-4 classes are offered annually • Serves northern and central 	

		<p>Wisconsin DNR</p> <ul style="list-style-type: none"> Students include loggers, foresters, landowners, highway departments, correctional facilities, conservation districts and municipalities 	
SCS review	The courses listed are advertised to the general public via numerous paid advertisements and through forestry and logging associations. Group member handbooks also include reference to safety issues (e.g., Timber Sale Handbook, Wisconsin Forest Management Guidelines).		
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)		

Finding Number: 04	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU): All	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	6.2.a
<p>Observation Background: NHI is not functioning optimally because there is a lack of clarity about the “likely presence of RTE species”. Details of the program not functioning optimally include:</p> <ul style="list-style-type: none"> The NHI information for each MFL property lacks a description of and evidence for how occurrences are being protected. Rather, many Cutting Notices simply had blanket statements that species protection would be achieved by frozen ground logging or by following BMPs. One Cutting Notice stated RTE species “most likely are not there” and that “keeping soil disturbance to a minimum is necessary to prevent damage if it is there.” The large percentage of outdated NHI data and the vagueness of the occurrence location relative to the MFL property that is being harvested (i.e., occurrences are only provided based a 1 mile buffer) results in less attention being paid to the system. Previously, NHI provided information about whether an occurrence was actually on a specific MFL property, but it now only provides information about it being within a one mile buffer. Consultations with Cooperative and MFL foresters suggests that less attention is being paid to NHI results because of the old data and lack of specificity on location. There was little evidence of foresters reporting new occurrences to NHI 	
<p>Observation: The MFL Program should take actions to improve the use of NHI data to avoid potential future nonconformances to the requirements of indicator 6.2.a.</p>	
FME response (including any	Training that is being developed to close out the CARs in Findings Nos. 6 and 8 will address this observation.

<p><i>evidence submitted)</i></p>	<p>“NHI Training for Forestry Staff,” a 3½-hour session, was put on to over 260 department forestry staff, including those that review timber sales for MFL lands. As part of this session, staffs were encouraged to turn in new records to NHI and were provided the location of the NHI rare plant and animal reporting forms. A description of the training is attached.</p> <div style="text-align: center;">  <p>NHI Forestry Training Information. </p> </div>
<p>SCS review</p>	<p>The training topics provide a good overview of how to use NHI as integrated into WisFRS, and how to use clear language to describe what RTE species are potentially present and how to protect or enhance their habitat. While DNR has made significant and valuable efforts in ensuring that NHI information is reviewed correctly, including through improving access to NHI databases and publications via WisFRS, NHI information is not consistently being updated in WisFRS and group member plans. Furthermore, DNR staff presented conflicting information on when NHI information must be updated for group members: some staff stated that NHI must be consulted when a new mandatory practice is being planned and others said that it must be updated when the management plan is updated during the re-enrolment phase. As this OBS will be fully addressed once the draft training program is completed, it will remain open until this training has been completed. However, see OBS for indicator 7.3.a.</p>
<p>Status of CAR:</p>	<p> <input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> <i>Other decision (refer to description above)</i> </p>

Finding Number: 05	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU): All	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	6.3.f
Observation Background: The following findings related to maintaining, enhancing, or restoring habitat components and associated stand structures triggered this Observation: <ul style="list-style-type: none"> • Cutting Notices and Management Plans systematically lacked information about numbers of den / cavity trees per acre relative to Silviculture Handbook requirements (e.g, a guideline of three or more cavity trees and as many snag trees as possible per acre should meet the requirements of most cavity-dwelling wildlife) • MFL Order 33-012-1999 stated that 28 cull trees (trees with possible decay) were marked with an “x” giving the logger the option to fell those trees. Yet there was no discussion or marking of wildlife trees on the sale. MFL Order 33-005-2003 allowed for “All standing dead and downed trees in the sale to be harvested”, again, without a discussion about wildlife trees. 	
Observation: The MFL program should consider how it systematically and practically maintains, enhances, or restores habitat components and associated stand structures.	
FME response <i>(including any evidence submitted)</i>	<p>The Silviculture Handbook provides guidance on management of specific timber types, yet does not prescribe any mandatory requirements. Foresters are required to match landowner goals with current stand conditions, science and MFL program requirements to determine the appropriate management recommendations.</p> <p>While most landowners have a wildlife management goal, it is appropriate to leave den trees if the wildlife management goal is to have cavity-dwelling wildlife. There are two ways that DNR will promote better discussion of cavity-dwelling wildlife:</p> <ul style="list-style-type: none"> • Provide training at the July-August Managed Forest Law (MFL) Recertification. DNR will encourage that Foresters discuss with landowners the option to leave cull, standing dead, cavity, or downed trees for wildlife except if they present a safety issue for loggers or if the trees have enough merchantable wood that can be utilized by industry. A review of all references in NR 46, Wis. Admin. Code associated with determining cull will be done. Also, reminders will be made to include documentation in the Cutting Notice regarding management decisions. • Videos that were developed to resolve other Cutting Notice CARs direct Foresters to describe in more detail the cutting methods, paint colors, etc.
SCS review	Since the closure of this OBS depends on DNR implementing its draft training program, it will remain open until DNR has completed it.
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above)

Finding Number: 06	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU): All	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	6.5.b
<p>Non-Conformity: Two site visits identified a BMP/Water Quality issue. Both involved clear cutting the RMZs along intermittent streams. Wisconsin BMPs for Water Quality (2010) specify a one hundred (100) foot RMZ on each side. BMPs provide for narrower (but some width) RMZ when adjacent area is not-sloping, has undisturbed soil, and is well-vegetated, which is the case here, but there is no documentation of a decision to have a smaller or no RMZ.</p> <p>Evidence: MFL Order 56-004-2007 MFL# 38-099-2003</p>	
<p>Corrective Action Request: Evidence of corrective action and conformance with applicable requirements must be submitted by the deadline stated above.</p>	
FME response <i>(including any evidence submitted)</i>	Steps to close out this CAR are being done in the same manner as for the Minor CAR in Finding Number 08. Please see the FME Response under Finding Number 08.
SCS review	As the draft training program has not been implemented, this Minor CAR cannot be closed based on actions that have not yet occurred.
Status of CAR:	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 07	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	6.8.d.

Non-Conformity: WI MFL is not in conformance with the requirement of not using Genetically Modified Organisms for any purpose. GMO crops were found on wildlife food plots in Marinette County.	
Corrective Action Request: Evidence of corrective action and conformance with applicable requirements must be submitted by the deadline stated above.	
FME response <i>(including any evidence submitted)</i>	WI DNR decided to remove the food plots from the scope of the certificate. The following MFL properties (approximately 3770 acres) are explicitly excluded or excised from the certificate: <ul style="list-style-type: none"> • Wildlife food plots (intensive non-forest use) Wildlife food plot – defined as an area that is planted to an agricultural or human food crop or non-native vegetation (e.g. clover) for the purpose of providing food for wildlife.
SCS review	SCS agreed with the approach of excising the food plots to ensure no GMOs are within the scope of the certificate. Food plots are non-forested, and do not belong within the scope of an FSC forest management certificate. Also, in 2010 this same approach was approved by FSC International Director of Policy for food plots on WI DNR State Lands.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 08	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	7.2.a
Non-Conformity: Updates to the management plan occur infrequently and inconsistently across the MFL program. The MFL Management Plan is the key property specific planning tool; however, it does not have a regular revision schedule within its 25 or 50 year term. Rather the MFL program currently focuses on updating the Cutting Notice to reflect changing conditions specific to an MFL Property. Auditors determined that the Cutting Notice is not being updated adequately and consistently across the MFL program to fulfill management plan update requirements.	
Corrective Action Request: Evidence of corrective action and conformance with applicable requirements must be submitted by the deadline stated above.	

FME response
(including any evidence submitted)

DNR has known through results of the internal audits, workload analysis, and Division of Forestry strategic direction that work is needed to improve the process of submitting and approving cutting notices and reports on MFL lands. DNR also understands that it will take time to effect long-term positive change. For this reason the Division of Forestry has implemented and continues to work of the following items:

1. DNR created a team to identify potential efficiencies in working through the cutting notice and report process. The team completed its work in September 2013 and DNR posted the results for public comments. As a result of the public comments and discussions with the Governor’s Council on Forestry and the DNR Forestry Leadership Team, a series of task efficiencies will be completed in Fiscal Year 2015.



MFL_TE_Sept2013_ConceptsDiscussion.pdf



summaryof comments_March2013



Task_Efficiency_Concepts_for_Implementer

2. Training of the cutting notice and report form occurred at the 2014 Cooperating Forester Statewide Meeting, which included a mixture of DNR Foresters, Cooperating Foresters and Certified Plan Writers.



A_Cutting_Notice_Short_Story_Print_Copy

3. DNR had planned on training all DNR Foresters and Certified Plan Writers during January through March 2014 on how to more accurately fill out the cutting notice and report form and to document changes to the management plan, however due to other training commitments, the DNR Forestry Operations Team decided that the MFL Recertification Sessions should occur in July and August. With this in mind, DNR began development of internet training courses that would be mandatory for DNR Foresters and Certified Plan Writers, yet be available for Cooperating Foresters, Loggers and landowners. The courses would be short segments that discuss aspects about harvesting timber, filling out the appropriate forms and segments within the forms. The due date of this training is summer 2014, however a sample of the videos can be found at the link

<http://ua.dnr.wi.gov/topic/forestlandowners/cuttingNoticeTraining.html>. The link to the videos are draft at this time and will be finalized in the near future.

4. WisFIRS migration allows for plans to be updated quickly. Certification requirements are included in management plans printed from WisFIRS even in the stand data has not been updated. DNR will update plans when practices are completed or when new landowners change goals, etc. DNR’s current policy is to update management plans under the following conditions:

- When closing out management practices after completion or when scheduled practices are not ready and/or needed.
- When new landowners purchase MFL lands and have new management goals.
- When current landowners request a change in their management plan due to changing management goals.
- When natural events occur that affect management practices as currently written (ex. Tornado, flooding, or other natural event change the stand conditions).

SCS review	As the draft training program has not been implemented, this Minor CAR cannot be closed based on actions that have not yet occurred.
Status of CAR:	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

4.2 New Corrective Action Requests and Observations

Finding Number: 2014.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US, indicator 4.2.b.
Non-Conformity (or justification): Two logging contracts reviewed in the Southern districts did not include or reference safety requirements. All other logging contracts reviewed contained reference to safety requirements. Contracts for MFL Order #s 23-007-1992 and 23-006-2002 lacked reference to safety requirements. The contract templates that loggers were using were not consistent with the templates provided by the Wisconsin Woodland Owners' Association (http://www.wisconsinwoodlands.org/resources.php) that MFL staff have provided significant comments on regarding certification requirements, including safety.	
Corrective Action Request (or observation): MFL should ensure that these logging contractors are aware of the requirement that contracts or other written agreements include safety requirements.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.2	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US 5.1.b (see also 5.2.b)
Non-Conformity (or justification): Harvest sites reviewed in the Southern districts had a difficult time attracting loggers to bid on the work due to several financial factors, including, but not limited to, distance to mills, small-scale timber sales, and lack of markets for low-grade material. This has led to removals of higher volumes of merchantable material and better quality seed sources on some sites visited for harvests conducted 2010-2012. Rendering these stands productive in the long-term may now require implementing management practices at a short-term cost to group members or the use of grants/ cost-share funding, especially if current harvesting practices (i.e., site prep., TSI, etc.) are not modified, costs are not reduced, or markets for low-grade material are not explored.	
Corrective Action Request (or observation): Cost-reducing and revenue-increasing measures, such as product diversification, should be explored in areas with limited market options so that DNR may better ensure that responses to short-term financial factors can remain within levels that are consistent with fulfillment of the FSC-US Standard.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US indicator 5.6.c (see also 6.3.d).

<p>Non-Conformity (or justification): On some of sites in Rock County, stands that were harvested under uneven-aged management (single-tree, group/ single-tree and group selection) had several of the largest trees removed or had high volumes of desirable species removed (e.g., oak species), which may make securing natural regeneration of these species difficult. Evidence reviewed included comparisons of pre-harvest and post-harvest volumes of species harvested; observation of oak clumps in which the outer, swooping trees were retained while those in the center were harvested; and observation of retained species.</p> <p>The lack of enough desirable seed sources could result in the loss of some species of these intolerant to mid-tolerant guilds over time. The Silvicultural Manual emphasizes that uneven-aged management systems are to be used to continually develop quality growing stock of multiple age classes, which is not happening in all cases. It warrants mention that many of the stands observed had merchantable or sub-merchantable individuals for the next entry; however, some intolerant to mid-tolerant species had their basal areas lowered to a point where regeneration may not be successful without site preparation or supplemental planting.</p> <p>In Waukesha and Rock Counties, some young planted walnut stands were suppressed due to intraspecific competition. This occurred on some properties that had dedicated a significant portion of land to walnut timber production. If timely pre-commercial thinning or other timber stand improvement activities are not conducted, it will take longer to achieve a stand with merchantable timber.</p>	
<p>Corrective Action Request (or observation): Rates and methods of timber harvest should lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, should be returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	
<p>FME response (including any evidence submitted)</p>	
<p>SCS review</p>	
<p>Status of CAR:</p>	<p><input type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 2014.4	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US indicator FF 6.2.a.
Non-Conformity (or justification): See OBS 2013.4. Closing OBS 2013.4 depends on DNR's completion of training described in its response.	
Corrective Action Request (or observation): DNR shall complete the training necessary to improve the use of NHI data to avoid potential future nonconformances to the requirements of indicator 6.2.a.	
FME response <i>(including any evidence submitted)</i>	<p>DNR has completed the on-line training for filling out the cutting notice and report form. A total of 382 people have passed the training, including:</p> <p>216 DNR Employees 159 Certified Plan Writers (CPWs) 13 Cooperating Foresters (non-CPWs) 2 Private Foresters 2 DNR Forestry Technicians 392 Total</p> <p>The exact steps to complete the training include:</p> <ol style="list-style-type: none"> 1. DNR announced the on-line training of how to fill out the Cutting Notice and Report Form to DNR Supervisors, Certified Plan Writers and Cooperating Foresters on June 26, 2014 to alert staff and partners of the upcoming training. 2. DNR announced that the on-line training was ready and available for DNR staff and partners to access. 3. A list of DNR Foresters, Certified Plan Writers, Cooperating Foresters and others has been developed.
SCS review	<p>In addition to the description above, DNR provided records of the training announcements and a weblink to the training (http://dnr.wi.gov/topic/ForestLandowners/cuttingNoticeTraining.html).</p> <p>Participants were required to take an online quiz after viewing the presentations, which allowed DNR to track attendance. DNR staff and CPWs were required to complete the training as they are involved in the planning and cutting notice process. To entice others not required to take the training, DNR provide continuing education credits for SAF Certified Foresters and Wisconsin Cooperative Foresters.</p>
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.5	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US indicator 6.3.f.
Non-Conformity (or justification): See OBS 2013.5. Closing OBS 2013.5 depends on DNR's completion of training described in its response.	
Corrective Action Request (or observation): DNR shall complete the training necessary so that it can better ensure the systematic and practical maintenance, enhancement, or restoration of habitat components and associated stand structures.	
FME response (including any evidence submitted)	<p>DNR has completed the on-line training for filling out the cutting notice and report form. A total of 382 people have passed the training, including:</p> <p>216 DNR Employees 159 Certified Plan Writers (CPWs) 13 Cooperating Foresters (non-CPWs) 2 Private Foresters 2 DNR Forestry Technicians 392 Total</p> <p>The exact steps to complete the training include:</p> <ol style="list-style-type: none"> 1. DNR announced the on-line training of how to fill out the Cutting Notice and Report Form to DNR Supervisors, Certified Plan Writers and Cooperating Foresters on June 26, 2014 to alert staff and partners of the upcoming training. 2. DNR announced that the on-line training was ready and available for DNR staff and partners to access. 3. A list of DNR Foresters, Certified Plan Writers, Cooperating Foresters and others has been developed.
SCS review	<p>In addition to the description above, DNR provided records of the training announcements and a weblink to the training (http://dnr.wi.gov/topic/ForestLandowners/cuttingNoticeTraining.html).</p> <p>Participants were required to take an online quiz after viewing the presentations, which allowed DNR to track attendance. DNR staff and CPWs were required to complete the training as they are involved in the planning and cutting notice process. To entice others not required to take the training, DNR provide continuing education credits for SAF Certified Foresters and Wisconsin Cooperative Foresters.</p>
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.6	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US indicator 6.5.b.
Non-Conformity (or justification): Failure to close Minor CAR 2013.6 by 2014 audit. MFL program has drafted a comprehensive training program, but has not yet implemented it. Training is scheduled for June-August 2014.	
Corrective Action Request (or observation): Evidence of corrective action and conformance with applicable requirements must be submitted by the deadline stated above.	
FME response (including any evidence submitted)	<p>DNR has completed the on-line training for filling out the cutting notice and report form. A total of 382 people have passed the training, including:</p> <p>216 DNR Employees 159 Certified Plan Writers (CPWs) 13 Cooperating Foresters (non-CPWs) 2 Private Foresters 2 DNR Forestry Technicians 392 Total</p> <p>The exact steps to complete the training include:</p> <ol style="list-style-type: none"> 1. DNR announced the on-line training of how to fill out the Cutting Notice and Report Form to DNR Supervisors, Certified Plan Writers and Cooperating Foresters on June 26, 2014 to alert staff and partners of the upcoming training. 2. DNR announced that the on-line training was ready and available for DNR staff and partners to access. 3. A list of DNR Foresters, Certified Plan Writers, Cooperating Foresters and others has been developed.
SCS review	<p>In addition to the description above, DNR provided records of the training announcements and a weblink to the training (http://dnr.wi.gov/topic/ForestLandowners/cuttingNoticeTraining.html).</p> <p>Participants were required to take an online quiz after viewing the presentations, which allowed DNR to track attendance. DNR staff and CPWs were required to complete the training as they are involved in the planning and cutting notice process. To entice others not required to take the training, DNR provide continuing education credits for SAF Certified Foresters and Wisconsin Cooperative Foresters.</p>

Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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Finding Number: 2014.7	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US indicator 6.6.a.
Non-Conformity (or justification): Products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents). MFL lists 2,4-D (Hi-Dep, Patron, etc.) in its annual chemical use reporting form. Certain formulations of 2,4-D are not allowed unless a duly approved derogation has been granted from FSC International Center. For example, in Patron (2,4-D, 2-ethylhexyl ester at 32% content) is considered a highly hazardous pesticide according to FSC-GUI-30-001, V2-0.	
Corrective Action Request (or observation): MFL shall discontinue the use of 2,4-D formulations that are on the FSC list of Highly Hazardous Pesticides or seek a derogation for these formulations through SCS.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2014.8	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US indicator FF 7.1.b.
<p>Non-Conformity (or justification): In Waukesha and Rock Counties, actions undertaken on group member FMUs were not consistent with the management plan developed to help to achieve the stated goals and objectives of the plan.</p> <p>On Order # 68-012-1993, a single-tree selection harvest was conducted rather than the shelterwood that was described in the management plan and cutting notice. Apparently, the owner discussed some new objectives with the forester, which prompted a harvest that would push the stand into tolerant hardwood and maintain a closed canopy for FIDS. This was not reflected in the cutting notice.</p> <p>On Order # 68-001-2001, the owner has started mowing underneath a white pine thinning site to control invasive species, but the actions and rationale behind them are not stated in the plan. Furthermore, the prescribed burning of oak stands used to control invasive species and meet other oak-management objectives is not mentioned as an option to achieve the goals and objectives of the plan.</p> <p>On Order #54-003-1993, a selection harvest was marked per the cutting notice, but a thinning was listed in WisFRS. On the ground, the harvest was a near full removal of all merchantable material with retention of mostly poor formed walnut.</p>	
Corrective Action Request (or observation): Actions undertaken on group member FMUs shall be consistent with the management plan and help to achieve the stated goals and objectives of the plan.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.9	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	

Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US indicator 7.2.a.
Non-Conformity (or justification): Failure to close Minor CAR 2013.8 by 2014 audit. MFL program has drafted a comprehensive training program, but has not yet implemented it. Training is scheduled for June-August 2014.	
Corrective Action Request (or observation): Evidence of corrective action and conformance with applicable requirements must be submitted by the deadline stated above.	
FME response <i>(including any evidence submitted)</i>	<p>DNR has completed the on-line training for filling out the cutting notice and report form. A total of 382 people have passed the training, including:</p> <p>216 DNR Employees 159 Certified Plan Writers (CPWs) 13 Cooperating Foresters (non-CPWs) 2 Private Foresters 2 DNR Forestry Technicians 392 Total</p> <p>The exact steps to complete the training include:</p> <ol style="list-style-type: none"> 1. DNR announced the on-line training of how to fill out the Cutting Notice and Report Form to DNR Supervisors, Certified Plan Writers and Cooperating Foresters on June 26, 2014 to alert staff and partners of the upcoming training. 2. DNR announced that the on-line training was ready and available for DNR staff and partners to access. 3. A list of DNR Foresters, Certified Plan Writers, Cooperating Foresters and others has been developed.
SCS review	<p>In addition to the description above, DNR provided records of the training announcements and a weblink to the training (http://dnr.wi.gov/topic/ForestLandowners/cuttingNoticeTraining.html). Participants were required to take an online quiz after viewing the presentations, which allowed DNR to track attendance. DNR staff and CPWs were required to complete the training as they are involved in the planning and cutting notice process. To entice others not required to take the training, DNR provide continuing education credits for SAF Certified Foresters and Wisconsin Cooperative Foresters.</p>
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.10	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US indicator 7.3.a.
<p>Non-Conformity (or justification): MFL program staff reported conflicting information on the management plan structure and what documents take precedence over others. For example, senior MFL program staff stated that information entered into WisFRS should take precedence over what is described in group member management plans since WisFRS is more likely to have been recently updated with the current mandatory practices. As confirmed through interviews, there is also not agreement among MFL program staff on how to deal with management practices that may be necessary to maintain planned stand trajectories, but are listed as non-mandatory. WisFRS for MFL was released earlier this year.</p> <p>DNR staff presented conflicting information on when NHI information must be updated for group members in WisFRS. Some staff stated that NHI must be consulted when a new mandatory practice is being planned and others said that it must be updated only when the management plan is updated during the re-enrolment phase. According to MFL procedures, NHI information must be updated during both of these phases.</p>	
<p>Corrective Action Request (or observation): All MFL staff shall be provided with sufficient guidance, training and/or supervision to adequately implement their components of the MFL program.</p>	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.11	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	

Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-STD-30-005, indicator 5.1.v. (see also FSC-US indicators 6.6.e and 8.2.d.1).
<p>Non-Conformity (or justification): MFL program maintains complete and up-to-date records covering the documentation and records regarding recommended practices for forest management (i.e. silvicultural systems, chemical use, TSI, etc.). However, there are instances where it is not clear if non-mandatory practices are being followed and how this could impact planned stand trajectories.</p> <p>Approved non-mandatory practices include the control of invasive species. Many times this includes the use of chemicals. Interviews confirmed and Management Plans state that "landowners should self-report pesticide use on their lands using the online form on the DNR website". Costs for implementing controls for invasive species may be available through cost-share programs. When these funds are used the MFL Forester is notified of the practice by the funding source. When cost-share funds are not used notification is the responsibility of the group member (Stated in FMP-Forest Certification). MFL Foresters must ensure chemical use is reported by the landowner as conducted. (FSC US Forest Management Standard v1-0, Indicator 6.6.e). No issues were identified with chemical use reporting.</p> <p>In Rock County, a previously completed shelterwood preparation cut on Order # 54-015-1995 had four non-mandatory practices assigned to it that may have allowed it to continue with the planned overstory removal cut that was instead altered to a single-tree selection harvest in 2010. Since no cost-share funds were used, completion of these activities was not assessed until planning for the next mandatory practice.</p>	
<p>Corrective Action Request (or observation): MFL program should identify appropriate data to collect and conduct an analysis to see if there is a problem with reporting/ recording chemical use and non-mandatory practices. Strategies to correct any problems identified should then be developed taking into account MFL's regulatory framework.</p>	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.12	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US 8.3.a (see also SCS COC indicators for FM, 1.2, 2.3, 5.1 and 5.2).
<p>Non-Conformity (or justification): MFL program is not ensuring that all sales documents issued for outputs sold with FSC claims include its FSC Forest Management (FM/COC) code and FSC claim. Some MFL staff are approving mandatory practices using previous versions of the cutting notice with expired FM/COC code and FSC claim. A template contract for forest products sold does not include the FSC claim and includes an expired COC code.</p> <p>Interviewees stated that foresters had been trained in COC; however, COC requirements are not well-understood or implemented. COC training records were requested and not received. The spreadsheet of 'HR Training' that includes for example 'Statewide Cooperating Forester Meeting' (3/27/2014) - 7 hours'; however, this spreadsheet does not include a list of attendees.</p>	
<p>Corrective Action Request (or observation): MFL shall ensure that the updated cutting notice forms are used so that its current FM/COC code and FSC claim are being properly communicated to buyers.</p>	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> 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

Group members	
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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

<input checked="" type="checkbox"/> 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	
Social concerns	
Environmental concerns	

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME’s response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Given the size and complexity of the MFL program, staff are consistently improving the efficiency of MFL program implementation.	

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 Department of Natural Resources
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Contact person	Mark Heyde		
Address	101 S. Webster St. Madison, WI 53703	Telephone	608-267-0565
		Fax	608-266-8576
		e-mail	mark.heyde@wiscosin.gov
		Website	dnr.wi.gov

FSC Sales Information

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

Scope of Certificate

Certificate Type	<input type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU	
	<input checked="" type="checkbox"/> Group		
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate	
	<input checked="" type="checkbox"/> Group SLIMF certificate		
# Group Members (if applicable)	37,682 as of March 2014		
Number of FMU's in scope of certificate	46,879 mfl parcels as of May 2014		
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude:		
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical	
Total forest area in scope of certificate which is: 2,540,534			
Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac			
privately managed	2,540,534		
state managed			
community managed			
Number of FMUs in scope that are:			
less than 100 ha in area	46,879	100 - 1000 ha in area	256
1000 - 10 000 ha in area		more than 10 000 ha in area	
Total forest area in scope of certificate which is included in FMUs that: Units: <input checked="" type="checkbox"/> ha or <input type="checkbox"/> ac			
are less than 100 ha in area	984,477		
are between 100 ha and 1000 ha in area	45,177		
meet the eligibility criteria as low intensity SLIMF FMUs	1,029,654		
Division of FMUs into manageable units:			
Managed Forest Law order numbers			

FSC Data Request

Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	2,349,892
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	164,995 (PR, SW and 2/3 PJ)
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	2,184,896
Silvicultural system(s)	Area under type of management
Even-aged management	
Clearcut (clearcut size range)	442,085 (A, OX, 1/3 PJ)
Shelterwood	602,610 (PW and O)
Other:	95,357 (BW and MR)
Uneven-aged management	
Individual tree selection	528,122 (NH)
Group selection	338,621 (BH, CH and SH)
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Each land owner has their own harvest intervals based on inventory data.
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	Owners may designate productive forest NTFPs not to exceed 20% of total acreage
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	We don't collect data on NTFPs on private lands.
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
Aggregated AAH or NTFB Harvest Rate does not apply to SLIMFs. Harvest intervals are included in the Managed Forest Law Stewardship Plans which use property specific inventory data.	
Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i>	
Species	Scientific Name
Aspen/Popple:	<i>Populus tremuloides</i> <i>Populus grandidentata</i>
Balsam poplar	<i>Populus balsamifera</i>

Bottomland hardwoods:

	<i>Populus</i>
Eastern Cottonwood	<i>deltoides</i>
Swamp white oak	<i>Quercus bicolor</i>
Silver maple	<i>Acer saccharinum</i>
American elm	<i>Ulmus americana</i>
River birch	<i>Betula nigra</i>
	<i>Fraxinus</i>
Green ash	<i>pennsylvanica</i>
White birch	<i>Betula papyrifera</i>
Northern white cedar	<i>Thuja occidentalis</i>

Central hardwoods:

	<i>Quercus</i>
White oak	<i>alba</i>
Bur oak	<i>Quercus macrocarpa</i>
Black oak	<i>Quercus velutina</i>
Northern pin oak	<i>Quercus ellipsoidalis</i>
Black walnut	<i>Juglans nigra</i>
Butternut	<i>Juglans cinerea</i>
Shagbark hickory	<i>Carya ovata</i>
Bitternut hickory	<i>Carya cordiformis</i>
Black cherry	<i>Prunus serotina</i>
Red maple	<i>Acer rubrum</i>
Hackberry	<i>Celtis occidentalis</i>
Balsam fir	<i>Abies balsamea</i>
Eastern hemlock	<i>Tsuga canadensis</i>

Miscellaneous conifers:

	<i>Pinus</i>
Scotch pine	<i>sylvestris</i>
European larch	<i>Larix decidua</i>
Norway spruce	<i>Picea abies</i>
Eastern redcedar	<i>Juniperus virginiana</i>
Blue spruce	<i>Picea pungens</i>

Miscellaneous deciduous:

	<i>Acer</i>
Norway maple	<i>platanooides</i>
Boxelder	<i>Acer negundo</i>
Black locust	<i>Robinia</i>

	<i>pseudoacacia</i>
Honey locust	<i>Gleditsia triacanthos</i>
Eastern Hophornbeam, Ironwood	<i>Ostrya virginiana</i>
Musclewood, Bluebeech	<i>Carpinus caroliniana</i>
Northern hardwoods:	
Sugar maple	<i>Acer saccharum</i>
	<i>Betula</i>
Yellow birch	<i>alleghaniensis</i>
White ash	<i>Fraxinus americana</i>
American beech	<i>Fagus grandifolia</i>
American basswood	<i>Tilia americana</i>
Northern red oak	<i>Quercus rubra</i>
Red Pine	<i>Pinus resinosa</i>
Jack Pine	<i>Pinus banksiana</i>
Eastern white pine	<i>Pinus strobus</i>
Black spruce	<i>Picea mariana</i>
Tamarack	<i>Larix laricina</i>
Black ash	<i>Fraxinus nigra</i>
White spruce	<i>Picea glauca</i>

FSC Product Classification

Timber products			
	Product Level 1	Product Level 2	Species
<input checked="" type="checkbox"/>	W1 Rough Wood	W1.1 Roundwood (logs)	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Siver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir, Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musclewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input checked="" type="checkbox"/>		W1.2 Fuel Wood	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Siver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir,

<input type="checkbox"/>			Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musclewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input type="checkbox"/>		W1.3 Twigs	
<input type="checkbox"/>	W2 Wood charcoal		
<input checked="" type="checkbox"/>	W3 Wood in chips or particles	W3.1 Wood chips	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Siver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir, Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musclewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input type="checkbox"/>	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
<input type="checkbox"/>	N6 Plants and parts of plants	N6.1 Flowers	
<input type="checkbox"/>		N6.2 Grasses, ferns, mosses and lichens	
<input checked="" type="checkbox"/>		N6.3 Whole trees or plants	<input checked="" type="checkbox"/> N6.3.1 Christmas trees
<input type="checkbox"/>		N6.4 Pine cones	

Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives		HCVF are not designated on private lands, however animals, plants, and habitats of significance are identified through the Natural Heritage Inventory database. This information is used to craft the stewardship plan and design harvesting operations that mitigate disruptions to these elements.		
High Conservation Value Forest/ Areas				
High Conservation Values present and respective areas:				Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac
	Code	HCV Type	Description & Location	Area
<input type="checkbox"/>	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		
<input type="checkbox"/>	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.		
<input type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		
<input type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
<input type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total Area of forest classified as 'High Conservation Value Forest/ Area'				

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

<input checked="" type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
Explanation for exclusion of FMUs and/or excision:		
Control measures to prevent mixing of certified and non-certified product (C8.3):		
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input type="checkbox"/> ac)

8. Annual Data Update

8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
Division of Forestry: 331 male workers	104 female workers	
Cooperators: 285	14	
Number of accidents in forest work since last audit:	Serious: #	Fatal: #

From WI DNR’s OSHA reporting form for 2013:

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases			
Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>11</u>	<u>12</u>	<u>49</u>
(G)	(H)	(I)	(J)

Number of Days	
Total number of days away from work	Total number of days of job transfer or restriction
<u>361</u>	<u>520</u>
(K)	(L)

Injury and Illness Types			
Total number of... (M)			
(1) Injury	<u>51</u>	(4) Poisoning	<u>5</u>
(2) Skin Disorder	<u>4</u>	(5) Hearing Loss	<u>1</u>
(3) Respiratory Condition	<u>3</u>	(6) All Other Illnesses	<u>8</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms

8.2 Annual Summary of Pesticide and Other Chemical Use

<input type="checkbox"/> 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
a. Clopyralid (Transline)			50 360	Control of competing

b. Glyphosate (Accord, Roundup, etc.)			144	vegetation, invasive control, or disease prevention (annosum)
c. Metsulfuron methyl (Escort, Patriot)			620	
d. Sulfometuron methyl (Oust, Spyder)			372	
e. Triclopyr (Garlon, Tahoe, etc.)			34	
f. 2,4-D (Hi-Dep, Patron, etc.)			498	
g. Borax (Sporax)			838	
h. Other: evade, Cell-u-treat I.Other: (Chopper)			300	

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.

- The RMU for this audit is set at the County level for this group certificate. All individual properties in the group qualify as a SLIMF and natural/ semi-natural management.

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
Ozaukee County RMU	SLIMF	Natural	Random sample
Waukesha County RMU	SLIMF	Natural	Random sample
Rock County RMU	SLIMF	Natural	Random sample
Green County RMU	SLIMF	Natural	Random sample
Outagamie County	SLIMF	Natural	Random sample
Brown County	SLIMF	Natural	Random sample
Waushara County	SLIMF	Natural	Random sample
Kewaunee County	SLIMF	Natural	Random sample

Appendix 2 – List of Stakeholders Consulted

List of FME Staff Consulted

Buenzow, MaryAnn – DNR, MaryAnn.Buenzow@wisconsin.gov
 Carranco, Nina L – DNR Nina.Carranco@wisconsin.gov
 Crow, Gerald R - DNR Gerald.Crow@wisconsin.gov
 Frost-Vahradian, Marcia - DNR <Marcia.FrostVahradian@wisconsin.gov>;
 Glaman, Rod A - DNR <Rod.Glaman@wisconsin.gov>;
 Heyde, Mark A - DNR <Mark.Heyde@wisconsin.gov>;
 Kaufman, Stephen J - DNR <Stephen.Kaufman@wisconsin.gov>;
 Kirschling, Frank A - DNR <Frank.Kirschling@wisconsin.gov>;
 Koltz, Nicholas - DNR <Nicholas.Koltz@wisconsin.gov>
 Lambert, Kristin E - DNR <Kristin.Lambert@wisconsin.gov>;
 Lubbers, John E - DNR <John.Lubbers@wisconsin.gov>;
 Mather, Robert J - DNR <Robert.Mather@wisconsin.gov>;
 Nelson, Kathryn J - DNR <Kathryn.Nelson@wisconsin.gov>;
 Nielsen, John A - DNR <John.Nielsen@wisconsin.gov>;

Nyquist, Jeffery E - DNR <Jeffery.Nyquist@wisconsin.gov>;
 Peltier, Julie M - DNR <Julie.Peltier@wisconsin.gov>;
 Plzak, Christopher Z - DNR <Christopher.Plzak@wisconsin.gov>;
 Potvin, Nicole R - DNR <Nicole.Potvin@wisconsin.gov>;
 Ruff, William R - DNR <William.Ruff@wisconsin.gov>;
 Secher, Cory D - DNR <Cory.Secher@wisconsin.gov>;
 Severson, Ryan J - DNR <Ryan.Severson@wisconsin.gov>;
 Sieger, Michael J - DNR <Michael.Sieger@wisconsin.gov>;
 Tucker, Joseph A - DNR <Joseph.Tucker@wisconsin.gov>;
 Warren, James K - DNR <JamesK.Warren@wisconsin.gov>;
 Weatherly, Jeffrey I - DNR <Jeffrey.Weatherly@wisconsin.gov>;
 Wickham, Richard J - DNR <Richard.Wickham@wisconsin.gov>;
 Wrzochalski, Michele R - DNR <Michele.Wrzochalski@wisconsin.gov>

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Jon Simonar	Group Member		Field Interview	No
John Riordan	Group Member		Field Interview	No
Chuck Barnowsky	Lakeshore Forest Products (Pete Novotny Property)		Field Interview	No
Robert Poull	Group Member		Field Interview	No
Chris Gergens	Lakeshore Forest Products (Peter Novotny Property)		Field Interview	No
Mark Giese	Group Member		Field Interview	No
Fancis Rabas	Group Member		Field Interview	No
Ray Perry	Cooperating Forester (Francis Rabas Property)		Field Interview	No
Dale Buser	Group Member		Field Interview	No
James Bedmar	Cooperating Forester (Francis Rabas Property)		Field Interview	No
Diane Miller	Group Member		Field Interview	No
Merlin Gerner	Group Member		Field Interview	No
Glenn Jonas	Group Member		Field Interview	No
Dan Hanson	Hanson Logging (Michael Williquette Property)		Field Interview	No
Dan Gelbach	Group Member		Field Interview	No
Ron Williams	Group Member		Field Interview	No
Barb Gelbach	Group Member		Field Interview	No
John Stoehr	Group Member		Field Interview	No

Steve Smith	Cooperating Forester		Field Interview	No
John Withers	Cooperating Forester		Field Interview	No
Alfred Lienhardt	Group Member		Field Interview	No
Robert Bergman	Group Member		Field Interview	No
Nana Schowalter	Group Member		Field Interview	No
James Schiller	Group Member		Field Interview	No
Thomas Magnor	Group Member		Field Interview	No
Wilbur Melaas	Group Member		Field Interview	No

Appendix 3 – Additional Audit Techniques Employed

No additional audit techniques were employed.

Appendix 4 – Pesticide Derogations

<input checked="" type="checkbox"/> There are no active pesticide derogations for this FME.		
Name of pesticide / herbicide (active ingredient)		Date derogation approved
Condition	Conformance (C / NC)	Evidence of progress

Appendix 5 – Detailed Observations

Evaluation Year	FSC P&C Reviewed
2013	All – (Re)certification Evaluation
2014	2.1, 2.2, 4.2, 5.2, 6.2, 6.3, 6.5, 6.7, 6.8, 6.9, 7.2, 7.3, 8.3 (COC indicators for FMEs).
2015	
2016	
2017	

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

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.		

<p>1.1 Forest management shall respect all national and local laws and administrative requirements.</p>	<p>NE</p>	
<p>1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</p>	<p>NE</p>	
<p>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.</p>	<p>NE</p>	
<p>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.</p>	<p>NE</p>	
<p>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</p>	<p>NE</p>	
<p>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p>	<p>NE</p>	
<p>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p>	<p>C</p>	
<p>2.1.a The forest owner or manager provides clear evidence of <i>long-term</i> rights to use and manage the FMU for the purposes described in the management plan.</p>	<p>C</p>	<p>Long-term use rights confirmed by:</p> <ul style="list-style-type: none"> • Forest Tax Law handbook, 2450.5. • Evidence of deed maintained in each property file. • Clear legal ownership is a precondition of MFL enrollment.
<p>2.1.b The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.</p>	<p>C</p>	<p>Ownership documents (e.g., deeds, titles) are in each case file (MFL order #). Verified at all of the RMUs of this audit.</p> <p>Other legally established use rights, such as power-line rights-of-way (ROW), were observed on MFL group member properties. In all cases observed, the power-line ROWs were at property</p>

		<p>boundaries and thus not considered to be a use right that would require special access via a group member’s property.</p> <p>Other property rights observed include the Ice Age Trail, which traverses at least one MFL group member property in the Southeastern district. Documents regarding the legal designation of the trail are not maintained by DNR, but rather by the landowner. Evidence of significant trespass issues, such as timber theft or poaching, was not evident during a walkthrough of the trail segment (MFL Order # 68-003-1992).</p> <p>Confirmed that properties classified as Open to public recreation are documented as such. MFL law (Forest Tax Law Handbook chapter 20-36) requires open status on parcels above 160 acres per municipality (80 acres in entries dated 2004 and earlier). WI DNR is currently building an on-line mapping resource to provide the public with better information about access to Open properties.</p>
<p>2.1.c Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.</p>	<p>C</p>	<p>Observed systematic boundary marking of MFL properties across all properties inspected. In many cases, corners are monumented with poles or other man-made features such as fence posts. Each group member file contains a map that indicates use rights and property boundaries. It is the group member responsibility to identify/maintain property boundaries prior to timber harvests or other management activities.</p>
<p>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.</p> <p><i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant</i></p>	<p>C</p>	

<i>jurisdiction.</i>		
2.2.a The forest owner or manager allows the exercise of <i>tenure</i> and <i>use rights</i> allowable by law or regulation.	C	Confirmed that properties classified as Open to public recreation are documented as such via a demonstration of WisFRS for the MFL program, as well as an online mapping tool (http://dnrmaps.wi.gov/opfl).
2.2.b In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.	C	See response to OBS 2013.2. Most timber harvesting activities are compatible with hunting rights on properties Open to public hunting since most harvests occur outside of hunting season and often promote conditions optimal for game species such as deer and turkey. The Ice Age Trail previously mentioned was not blocked or otherwise encumbered in any way; public access to the trail is evident in the field.
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.	NE	
Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	NE	
3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	NE	
3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	NE	
3.4. Indigenous peoples shall be	NE	

<p>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.</p>		
<p>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</p>		
<p>4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</p>	<p>NE</p>	
<p>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	<p>C</p>	
<p>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). FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>This indicator continues to be low risk of negative impact. DNR provides information on applicable laws and regulations on health and safety in the Timber Sale Handbook and Private Forestry Handbook.</p>
<p>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.</p>	<p>C</p>	<p>DNR provides information on applicable laws and regulations on health and safety in the Timber Sale Handbook and Private Forestry Handbook, including basic contractual requirements. Refer also to response to OBS 2013.3. Most contracts were reviewed during the 2014 audit in Northern districts included safety requirements. However, refer to OBS 2014.1.</p>
<p>4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>According to DNR staff and certified plan writers interviewed, most landowners contract with local loggers and other service providers that have reputations for good work. No safety issues were reported and no significant residual stand damage was observed on harvest or prescribed burn sites visited during the audit, which indicates that there is still low risk of negative impacts for this indicator.</p>

<p>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).</p>	<p>NE</p>	
<p>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.</p>	<p>NE</p>	
<p>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.</p>	<p>NE</p>	
<p>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.</p>		
<p>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.</p>	<p>NE</p>	
<p>5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.</p>	<p>NE</p>	
<p>5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.</p>	<p>C</p>	<p>Refer to OBS 2014.2.</p>
<p>5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</p>	<p>C</p>	

<p>5.2.a Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.</p> <p>FF Indicator: Low risk of negative social or environmental impact</p>	C	<p>Most contractors interviewed or listed on cutting notices were from nearby communities or from neighboring states close enough to group members to be considered local. In order of importance, most timber harvested in sold in Wisconsin, Minnesota or Iowa.</p>
<p>5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.</p>	C	<p>Refer to OBS 2014.2.</p>
<p>5.2.c On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.</p>	NA	<p>MFL does not include public forests.</p>
<p>5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>	NE	
<p>5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	NE	
<p>5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	NE	
<p>5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	NE	
<p>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</p>	NA	<p>FME consists of SLIMF members only.</p>

<p>size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <p>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.</p>		
<p>FF Indicator 5.6.a On family forests, a sustained yield harvest level analysis shall be completed. Data used in the analysis may include but is not limited to:</p> <ul style="list-style-type: none"> - regional growth data; - age-class and species distributions; - stocking rates required to meet management objectives; - ecological and legal constraints; - empirical growth and regeneration data; and, - validated forest productivity models. 	NE	
<p>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.</p>	NA	FME is SLIMF.

<p>FF Indicator 5.6.b. On family forests, harvest levels and rates do not exceed growth rates over successive harvests, contribute directly to achieving desired future conditions as defined in the forest management plans, and do not diminish the long term ecological integrity and productivity of the site.</p>	<p>NE</p>	
<p>5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	<p>C</p>	<p>On some of the harvests in Rock County, harvests that were marked as single-tree, group or single-tree and group selection were high-graded or had high volumes of desirable species removed (e.g., oak), which may make securing natural regeneration of these species difficult. The Silvicultural Manual emphasizes that these systems are to be used to continually develop quality growing stock of multiple age classes. This is not happening in all cases.</p> <p>In Waukesha and Rock Counties, some young planted walnut stands were suppressed due to intraspecific competition. This occurred on some properties that had dedicated a significant portion of land to walnut timber production.</p> <p>See OBS 2014.3.</p>
<p>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.</p>	<p>NE</p>	
<p>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.</p>		
<p>6.1. Assessments of environmental impacts</p>	<p>NE</p>	

<p>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.</p>		
<p>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.</p>	C	
<p>6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	NA	All group members qualify as SLIMF.
<p>FF Indicator 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</p>	NC	<p>See response to OBS 2013.4, which largely hinges on DNR's successful implementation of actions to address open Major CARs.</p> <p>Per MFL procedures, Natural Heritage Inventory (NHI) surveys are completed prior to preparing an MFL Management Plan and prior to a harvest (via</p>

<p>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. A secondary review of the survey does not need to be included in the process. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>		<p>the Cutting Notice). If the NHI query indicates possible presence of forest dwelling RTE species, management occurs with the assumption that they are present. The integration of NHI into WisFRS has improved MFL’s capacity to update NHI information in a timely manner prior to site-disturbing activities.</p> <p>During review of WisFRS entries for group members in the Southeastern District (Waukesha, Ozaukee, Rock, and Green Counties), several group member entries in WisFRS have not had NHI assessed. However, NHI reviews will be conducted for these group members at the next plan update or the planning phase for an upcoming mandatory practice per MFL procedures. See CAR 2014.4.</p>
<p>6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	C	<p>See 6.2.a. Also, conservation zones/ protected areas may be established for sensitive sites that contain or may contain RTE species. Management on these small ownerships tends to be passive or management activities to control potential threats to the viability of RTE species, such as invasive species.</p>
<p>6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species’ recovery goals, as well as landscape level biodiversity conservation goals.</p>	NA	<p>No public FMUs within group.</p>
<p>6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	C	<p>MFL members consist of private lands. Trespass incidents are mostly limited to hunting without permission or theft of NTFPs. Through gating properties and/or conducting regular inspections, group members implement measures that reasonably prevent or deter these types of activities.</p>

		Poaching of animals is controlled through DNR Law Enforcement.
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 <i>successional</i> 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	<p>Maintaining and enhancing under-represented successional stages occurs through implementation of WI DNR Silviculture Handbook. Additionally, NHI covers some under-represented communities.</p> <p>In Southern Wisconsin, past management practices encouraged the planting of conifers (e.g. White pine, Red pine, White spruce) on sites that most likely would have been oak-savannah, mixed oak woodland or central to shade tolerant hardwoods. Older aged trees are often retained as scattered individuals or are managed until a regeneration harvest becomes necessary to avoid losing the species from the site. Some sites are also being managed to Central or shade tolerant hardwoods over time as it has become more difficult to secure oak regeneration in shelterwood harvests and to leave some vigorous, well-formed desirable species (e.g., oaks, walnuts) due to market conditions. So ensuring a mix of successional stages and maintaining less tolerant, heavier-seeded species on small ownerships (<30 acres) remains a challenge. See also 6.3.d.</p>
6.3.a.2 When a <i>rare ecological community</i> 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	C	Rare ecological communities are identified through NHI and by following the Silviculture Handbook. Additionally, Ecological Landscapes Handbook is used by MFL and Cooperating Foresters to identify and manage for rare community types.

<p>the existing community, conservation zones and/or protected areas are established where warranted.</p>		
<p>6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p>	<p>C</p>	<p>If identified, Type 1 and Type 2 old growth is to be managed in accordance with WI DNR Old Growth and Old Forests Handbook. This handbook is designed to meet 6.3.a.3 requirements for ensuring protection of old growth. Old growth is very rare in Wisconsin and occurrences on MFL properties have not been identified.</p> <p>No public or tribal lands are within the scope of the certificate.</p>

<p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 		
<p>6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>NA</p>	<p>All properties qualify as a SLIMF.</p>
<p>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ol style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed 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. 	<p>C</p>	<p>Observed good conformance with WI DNR BMPs for riparian habitat requirements of this indicator and Water Quality. RMZs observed were respected in the field and any harvests within them were limited to selection. Some group members conducted tree plantings in RMZs that were previously grazed in order to provide shade and woody debris.</p>

<p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	<p>C</p>	<p>On some of the harvests in Rock County, harvests that were marked as single-tree, group or single-tree and group selection were high-graded or had high volumes of desirable species removed, which may make securing natural regeneration difficult. The Silvicultural Manual emphasizes that uneven-aged management systems are to be used to continually develop quality growing stock.</p> <p>See OBS 2014.3.</p>
<p>6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>	<p>C</p>	<p>Nearly all seedlings are obtained from the WI DNR State Nurseries. Local sources are used when available, and the DNR forester must approve tree planting species lists.</p> <p>Observed good conformance with planting of red oak, black walnut, red pine, and other species from the State Nursery using local sources of known provenance.</p>
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> 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. <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>	<p>NC</p>	<p>Covered by Chapter 24 of Silviculture Handbook.</p> <p>Observed overall conformance with requirements for stand level habitat, especially in areas where larger, un-merchantable oaks are being allowed to develop into snag and den trees. Many of these larger-sized oaks exhibit the qualities of legacy trees that were maintained when the area was under pasture or agriculture.</p> <p>See CAR 2014.5.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage</p>	<p>C</p>	<p>Requirement is covered by Chapter 24 of Silviculture Handbook. Observed overall conformance with this requirement in even-aged management treatments.</p>

<p>harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 	<p>NA</p>	<p>There have not been any deviations from even-aged management restrictions on group member FMUs.</p>

<p>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</p>		
<p>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <i>invasive species</i>, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	<p>C</p>	<p>Invasive species are assessed during Management Plan writing and prior to a timber sale (extent and development of possible control measures/ timelines). Interviews with group members and MFL foresters indicate a high level of awareness of invasive species and control measures. MFL foresters draw from multiple sources of information on control measures and monitoring techniques, including several DNR sources and MFL program manuals.</p> <p>While some group members are not as aggressive in implementing control measures on a regular basis, many group members visited in 2014 were conducting intensive control measures for invasive plants such as buckthorn (<i>Rhamnus spp.</i>) and Garlic mustard (<i>Alliaria petiolata</i>).</p>
<p>6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	<p>C</p>	<p>Occurs by following Silviculture Handbook and DNR Forest Management Guidelines. Fire on group member properties is used to control slash or invasive species, and as a site preparation tool. Public safety measures and seasonal restrictions are adhered to.</p>
<p>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.</p>	<p>NE</p>	
<p>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.</p>	<p>C</p>	

<p>6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	<p>C</p>	<p>Refer to Wisconsin BMPs for Water Quality, Wisconsin Forest Management Guidelines, and other manuals produced by DNR.</p>
<p>6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	<p>NC</p>	<p>Observed excellent familiarity with BMPs and overall very good conformance on all properties visited.</p> <p>See Major CAR 2014.6.</p>
<p>6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate. 	<p>C</p>	<p>MFL’s implementation of BMPs, Biomass Harvest Guidelines, and Silviculture Handbook result in conformance with the bulleted requirements of 6.5.c. Of note during 2014, some group members in the Southeastern District have been using fire to control slash density and invasive species.</p>
<p>6.5.d The transportation system, including</p>	<p>C</p>	<p>MFL’s implementation of BMPs, Forest</p>

<p>design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 		<p>Management Guidelines, Silviculture Handbook result in conformance with the bulleted requirements of 6.5.d.</p> <p>In 2014, most transportation systems are simple with few, if any, permanent stream crossings. Some sites in the Southeastern District were making efforts to restore tree species composition in riparian areas that had been degraded due to past grazing activities.</p>
<p>6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written Streamside Management Zone (SMZ) buffer management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths</p>	<p>C</p>	<p>MFL’s implementation of BMPs for Water Quality covers this requirement and has a built-in variance mechanism in case minor deviations from minimum BMPs are required to restore riparian tree species composition or conduct other activities intended to restore or protect hydrologic functions in the long-term.</p>

<p>and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>		
<p>6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>	<p>C</p>	<p>No variations from minimum SMZ widths. Refer to 6.5.e.1.</p>
<p>6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of aquatic habitat. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are</p>	<p>C</p>	<p>MFL's implementation of BMPs for Water Quality. Stream crossings reviewed during 2014 audit conformed with 6.5.f.</p>

finished.		
6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	C	Given their small size and that recreational use is typically limited to family and friends of landowner, MFL properties conform to 6.5.g. One instance of a public trail was observed in the 2014 audit. Properties open to public hunting were also visited. Observed no instances of damage arising from recreation during 2014 audit.
6.5.h Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.	C	Grazing is prohibited by statute on MFL properties. No such grazing was detected on site visits in 2014.
6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.	NE	
6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).	NC	Refer to Major CAR 2014.7.
6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the	NE	

<p>only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>		
<p>FF Indicator 6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Family forest owners/managers may use brief and less technical written</p>	<p>NE</p>	

<p>procedures for applying common over-the-counter products. Any observed misuse of these chemicals may be considered as violation of requirements in this Indicator. Whenever feasible, an eventual phase-out of chemical use is included in the strategy.</p>		
<p>6.6.c Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.</p>	NE	
<p>6.6.d Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.</p>	NE	
<p>6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	C	See OBS 2014.11.
<p>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.</p>	C	
<p>6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills</p>	C	MFL group members usually contract loggers to conduct harvesting activities. Loggers are expected to comply with FISTA requirements for responding to spills. Logging equipment

		inspected in Northern districts were maintained in working order and had spill kits located in compartments. No evidence of fuel or chemical spills was observed on harvest sites visited.
6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	There was no evidence of spills; loggers are required to adhere to FISTA regulations, which require that loggers be able to contain spills in a timely manner. Wisconsin BMPs cover the topic of this indicator.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	There were no active management activities observed, but BMPs issued by DNR cover the topics of this indicator.
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	C	
6.8.a Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i> , insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.	C	WI DNR uses <i>Bacillus thuringiensis kurstaki</i> (Btk) and Nucleopolyhedrosis Virus (Gypchek) to control gypsy moth and other forest pests. The safety and effectiveness of these treatments has been substantiated by the scientific literature and are guided by USDA protocols.
6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.	C	Btk and Gypchek are applied aerially by trained WI DNR contractors as confirmed through interviews with DNR staff and review of DNR-produced literature (e.g., http://datcp.wi.gov/uploads/Environment/pdf/ST_SProgram09.pdf).
6.8.c If biological control agents are used,	C	Use of Btk and Gypchek follows USDA protocols

<p>their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.</p>		<p>and plans, which are consistent with the content of this indicator. USDA documentation is available from USDA’s website. Wisconsin DNR also has several documents online about the application and monitoring of two biological controls (e.g., http://dnr.wi.gov/files/PDF/pubs/ea/EA0143.pdf and http://datcp.wi.gov/uploads/Environment/pdf/STSPProgram09.pdf).</p>
<p>6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose</p>	<p>C</p>	<p>There is no use of GMO trees. See response to Major CAR 2013.7, which was closed in 2013.</p>
<p>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p>	<p>C</p>	
<p>6.9.a The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p>	<p>C</p>	<p>Exotic species used include Norway Spruce (<i>Picea abies</i>), Black locust (<i>Robinia pseudoacacia</i>), English walnut (<i>Juglans regia</i>), and Apple (<i>Malus</i> spp.). Most of these are the result of legacy plantings conducted several decades ago and these species are managed over time considering that they will be replaced with naturally occurring species via natural or assisted regeneration. Apples may be replanted or retained as part of food plot programs or to maintain a historical condition dating from early European settlement.</p>
<p>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.</p>	<p>C</p>	<p>These species were planted so long ago that their provenance is likely lost. However, Black locust naturally occurs in the Appalachians and Ozarks and in some parts of Wisconsin is considered naturalized. Norway spruce is from Europe and rarely generates offsite.</p>
<p>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</p>	<p>C</p>	<p>None of these species has spread significantly off the sites on which they have been established.</p>
<p>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</p>	<p>NE</p>	

<p>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.</p>		
<p>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.</p>		
<p>7.1. The management plan and supporting documents shall provide:</p> <ul style="list-style-type: none"> a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands. b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species. b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used. 	<p>NE</p>	
<p>FF Indicator 7.1.a A written management plan exists for the property or properties for which certification is being sought. The management plan includes the following components:</p> <ul style="list-style-type: none"> i. Management objectives (ecological, 	<p>NE</p>	

<p>silvicultural, social, and economic) and duration of the plan.</p> <p>Guidance: Objectives relate to the goals expressed by the landowner within the constraints of site capability and the best available data on ecological, silvicultural, social and economic conditions.</p> <p>ii. Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information.</p> <p>Guidance: In addition to stand-level descriptions of the land cover, information in site-level plans may include: landscape within which the forest is located; landscape-level considerations; past land uses of the forest; legal history and current status; socio-economic conditions; cultural, tribal and customary use issues and other relevant details that explain or justify management prescriptions.</p> <p>iii. Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used.</p> <p>iv. Description of harvest limits (consistent with Criterion 5.6) and species selection. Also, description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate.</p> <p>v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of</p>		
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<p>existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).</p> <p>Guidance: Regional environmental assessments and safeguards or strategies to address pest and weed management, fire management, protection of rare, threatened, and endangered species and plant community types, protection of riparian management zones, and protecting representative samples of ecosystems and High Conservation Value Forests may be developed by state conservation agencies. Site specific plans for family forests should be consistent with such guidance and may reference those works for clarity.</p> <p>vi. Description of location and protection of rare, threatened, and endangered species and plant community types.</p> <p>vii. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8.</p> <p>viii. Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected areas in a manner that clearly relates to the forest description and management prescriptions.</p> <p>Guidance: Property level maps for family forests may be simple and efficient to produce, and may cover only the necessary information needed for management to the FSC-US Family Forest Standard. At the group level, if GIS is used coverage should include protected areas, planned management activities, land ownership, property boundaries, roads, timber production</p>		
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<p>areas, forest types by age class, topography, soils, cultural and customary use areas, locations of natural communities, habitats of species referred to in Criterion 6.2, riparian zones and analysis capabilities to help identify High Conservation Value Forests. Group managers may rely on state conservation agencies for complex GIS services.</p>		
<p>FF Indicator 7.1.b Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.</p>	<p>NC</p>	<p>In Waukesha and Rock Counties, actions undertaken on group member FMUs were not consistent with the management plan developed to help to achieve the stated goals and objectives of the plan.</p> <p>On Order # 68-012-1993, a single-tree selection harvest was conducted rather than the shelterwood that was described in the management plan and cutting notice. Apparently, the owner discussed some new objectives with the forester, which prompted a harvest that would push the stand into tolerant hardwood and maintain a closed canopy for FIDS.</p> <p>On Order # 68-001-2001, the owner has started mowing underneath a white pine thinning site to control invasive species, but the actions and rationale behind them are not stated in the plan. Furthermore, the prescribed burning or oak stands used to control invasive species and meet other oak-management objectives is not mentioned as an option to achieve the goals and objectives of the plan.</p> <p>On Order #54-003-1993, a selection harvest was marked per the cutting notice, but a thinning was listed in WisFRS. On the ground, the harvest was a near full removal of all merchantable material with retention of mostly poor formed walnut.</p>

		See Minor CAR 2014.8.
7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	NC	
7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.	NC	See Major CAR 2014.9.
7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	NC	MFL program staff reported conflicting information on the management plan structure and what documents take precedence over others. For example, senior MFL program staff stated that information entered into WisFRS should take precedence over what is described in group member management plans since WisFRS is most likely to have been more recently updated with the most current mandatory practices. As confirmed through interviews, there is also not agreement among MFL program staff on how to deal with management practices that may be necessary to maintain planned stand trajectories, but are listed as non-mandatory. DNR staff presented conflicting information on when NHI information must be updated for group members in WisFRS. Some staff stated that NHI must be consulted when a new mandatory practice is being planned and others said that it must be updated only when the management plan is updated during the re-enrolment phase. According to MFL procedures, NHI information

		<p>must be updated during both of these phases. Further trainings on WisFRS are already planned.</p> <p>See CAR 2014.10.</p>
<p>7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</p>	NE	
<p>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.</p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p>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.</p>	NE	
<p>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.</p>	NE	
<p>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.</p>	NE	

<p>8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	<p>NE</p>	
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>NE</p>	
<p>8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their <i>habitats</i>; 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). 	<p>NE</p>	
<p>8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	<p>C</p>	<p>See OBS 2014.11.</p>
<p>8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	<p>NE</p>	
<p>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</p>	<p>NE</p>	

4.1.b), and local purchasing opportunities (see Indicator 4.1.e).		
8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.	NE	
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).	NE	
8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	NE	
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."	C	
8.3.a When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See Chapter 21 of Forest Tax Law Handbook and Cutting Notice form (2450-32). While certificate code and trademark usage explanations are outdated in the handbook, the certificate code and FSC claim are correct on the Cutting Notice. The Cutting Notice is the primary tool in use for determining FSC claims.
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	NC	Refer to Major CAR 2014.12 in COC indicators for FMEs.
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	NE	
8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	NE	
Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always		

be considered in the context of a precautionary approach.

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

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

9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	NE	
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	NE	
9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	NE	
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	NE	

Appendix 6 – Chain of Custody Indicators for FMEs

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

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

REQUIREMENT	C/NC	COMMENT / CAR
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1. Quality Management		
<p>1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.</p>	C	<p>Mark Heyde, Forest Certification Coordinator has been appointed and has overall responsibility and authority for certification.</p>
<p>1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.</p>	NC	<p>Sales records requested were provided to the auditor. COC training records were requested and not received. The spreadsheet of 'HR Training' that includes for example 'Statewide Cooperating Forester Meeting' (3/27/2014) - 7 hours', however this spreadsheet does not include a list of attendees. See Major CAR 2014.12.</p>
<p>1.3 The FME shall define its forest gate(s) (check all that apply): <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i></p>	C	<p>Stump <input type="checkbox"/> <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.</i></p> <p>On-site concentration yard <input type="checkbox"/> <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p>Off-site Mill / Log Yard <input type="checkbox"/> <i>Transfer of ownership occurs when certified-product is unloaded at purchaser’s facility.</i></p> <p>Auction house / Brokerage <input type="checkbox"/> <i>Transfer of ownership occurs at a government-run or private auction house / brokerage.</i></p> <p>Lump-sum sale / Per Unit / Pre-Paid</p> <p><input checked="" type="checkbox"/> Agreement <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.</i></p> <p>Log landing <input type="checkbox"/> <i>Transfer of ownership of certified-product occurs at landing / yarding areas.</i></p> <p><input type="checkbox"/> Other (Please describe):</p>

<p>1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.</p>	<p>C</p>	<p>By law the timber on MFL timber must be segregated from non-MFL timber. On some sites visited the contract of sale included MFL and non-MFL timber. By law the timber must be segregated for the paying of taxes. Interview with foresters and loggers confirmed segregation and described process for segregation. No issue identified.</p>
<p>1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or debarking units, small portable sawmills or on-site processing of chips / biomass originating from the FMU under evaluation.</i></p>	<p>C</p>	<p>Harvesting of timber does not occur until the contract for sale has been processed between the landowner and purchaser.</p>
<p>2. Product Control, Sales and Delivery</p>		
<p>2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).</p>	<p>C</p>	<p>Cutting Notice and Report of Wood Products from Forest Crop and Managed Forest Lands identifies the products as certified.</p>
<p>2.2 The FME shall maintain records of quantities / volumes of FSC-certified product(s).</p>	<p>C</p>	<p>The approved Cutting Notice and Report of Wood Products from Forest Crop and Managed Forest Lands is completed and returned to Wisconsin DNR with the volume of products harvested following completion of the harvesting.</p>
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> a) name and contact details of the organization; b) name and address of the customer; c) date when the document was issued; d) description of the product; e) quantity of the products sold; f) the organization’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: <ul style="list-style-type: none"> i. the claim “FSC 100%” for products from FSC 100% product groups; ii. the claim “FSC Controlled 	<p>NC</p>	<p>MFL program is not ensuring that all sales documents issued for outputs sold with FSC claims include its FSC Forest Management (FM/COC) code and FSC claim. Some MFL staff are approving mandatory practices using previous versions of the cutting notice with expired FM/COC code and FSC claim. A template contract for forest products sold does not include the FSC claim and includes an expired COC code. See Major CAR 2014.12.</p>

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

3.1 Describe where / how the organization uses the SCS and FSC trademarks for promotion.		
3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.		
3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.		
4. Outsourcing		<input checked="" type="checkbox"/> N/A
4.1 The FME shall provide the names and contact details of all outsourced service providers.		
4.2 The FME shall have a control system for the outsourced process which ensures that: <ul style="list-style-type: none"> a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use. 		
5. Training and/or Communication Strategies		
5.1 All relevant FME staff and outsourcers shall be trained in the FME's COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME's COC control system.	NC	Interviewees stated that Staff, Cooperating Foresters, and Plan Writers had been trained in COC however COC requirements are not well-understood or implemented. See Major CAR 2014.12.

<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).</p>	<p>NC</p>	<p>COC training records were requested and not received. The spreadsheet of 'HR Training' that includes for example 'Statewide Cooperating Forester Meeting' (3/27/2014) - 7 hours', however this spreadsheet does not include a list of attendees. See Major CAR 2014.12.</p>
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Appendix 7 – Group Management Program Members



MFL Certified Group
Members by MFL Ord