

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

**Wisconsin County Forest Program
Managed by Wisconsin DNR**

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

**CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00083G**

Submitted to:

Wisconsin Department of Natural Resources

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Date of Field Audit: August 17-24, 2009

Date of Report: October 8, 2009

Certified: November 11, 2009

By:

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Organization of the Report

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

FOREWORD

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

From August 17 – 24, 2009, an interdisciplinary team of four natural resource specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 5 day field and office audit of the subject property as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team determined conformance to the 56 FSC Criteria in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to Wisconsin Department of Natural Resources, for the management of the Wisconsin County Forest Program covering County Forests listed in Table 1, and pending closure of Major CAR 2009.1. In the event that a certificate is awarded Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

Wisconsin County Forest Program	1
Foreword	3
Section A- Public Summary and Background Information	6
Section A- Public Summary and Background Information	6
1.0 GENERAL INFORMATION	6
1.1 FSC Data Request	6
1.2 Management Context	8
1.2.1 Environmental Context	10
1.3 Forest Management Enterprise	15
1.3.1 Land Use	16
1.3.2 Land Outside the Scope of Certification	16
1.4 Management Plan	17
1.4.1 Management Objectives	17
1.4.2 Forest Composition	17
1.4.3 Silvicultural Systems	18
1.4.4 Organization and Scope	19
1.4.5 Monitoring System	21
1.4.6 Estimate of Maximum Sustainable Yield	21
1.4.7 Estimated, Current and Projected Production	21
1.4.8 Chemical Pesticide Use	23
2.0 Guidelines/Standards Employed	23
3.0 THE CERTIFICATION ASSESSMENT PROCESS	23
3.1 Assessment Dates	23
3.2 Assessment Team	24
3.3 Assessment Process	27
3.3.1 Itinerary	27
3.3.5 Stakeholder Consultation	37
3.4 Total Time Spent on Audit	42
3.5 Process of Determining Conformance	42
4.0 Results of the Evaluation	43
Table 4.1 Notable strengths and weaknesses of the forest management enterprise relative to the P&C	43
4.2 Preconditions	48
5.0 Certification Decision	48
5.1 Certification Recommendation	48
5.2 Corrective Action Requests	49
Progress / Completion	49
Progress / Completion	51
Progress / Completion	52
Progress / Completion	53
Progress / Completion	54
6.0 Surveillance Evaluations	60
7.0 Summary of SCS Complaint Investigation Procedure	60
Section B Detailed Results of the Full Evaluation	62
1.0 Detailed Evaluation of Conformance	62

.11	Controversial Issues	110
2.0	TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS ...	110
2.1	Evaluation of Risks of Mixing Certified and Un-Certified Product	110
2.2	Description of the Log Control System	110
2.3	End Point of Chain of Custody	111
2.4	Visual Identification at End Point of Chain of Custody	111
3.0	Group Management	112
3.1	Division of Responsibilities	112
3.2	Conformance with Group Management Criteria	112
3.3	Group Sampling and surveillance	112
3.4	Group Size and Scope	112
3.5	Group Members	112
3.6	Group Management Evaluation	113

SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION

1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	Wisconsin County Forest Program
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Certificate Number	SCS-FM/COC-0083G
Certificate/Expiration Date	November 11, 2014
Certificate Type	<i>Group forest management certificate with forest gate chain-of-custody</i>
Forest zone	<i>Temperate</i>
Total forest area in scope of certificate:	
Chemical pesticides used	<i>See section 1.4.8</i>
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	The forest is a mosaic of conifer and hardwood cover types, classified by species dominance; e.g., white pine, spruce-fir, northern hardwoods, central hardwoods, oak, aspen, planted pine stands
List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products	Round wood, pulpwood, sawtimber, and firewood, and

Conversion Table English Units to Metric Units

Length Conversion Factors

To convert from	to	multiply by
mile (US Statute)	kilometer (km)	1.609347
foot (ft)	meter (m)	0.3048
yard (yd)	meter (m)	0.9144

Area Conversion Factors

To convert from	to	multiply by
square foot (sq ft)	square meter (sq m)	0.09290304
acre (ac)	hectare (ha)	0.4047

Volume Conversion Factors

Volume

To convert from	to	multiply by
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
gallon (gal)	liter	4.546
1 acre	= 0.404686 hectares	
1,000 acres	= 404.686 hectares	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	
1,000 cubic feet	= 28.317 cubic meters	

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

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

This report addresses the five-year reassessment of the Wisconsin County Forest Program (WCFP) pursuant to the FSC guidelines for forest management certification assessments as well as the forest management certificate awarded by Scientific Certification Systems (SCS-FM/COC-0083G). The WCFP was first awarded certification for the State Forests in March 2005. Annual audits were completed for the County Forests in each subsequent year from 2006–2008. The original public summary of the initial evaluation and subsequent annual audits is available upon request from SCS.

The assessment was conducted with the applicable FSC regional standard, the Lake States-Central Hardwoods Region (USA) Regional Forest Stewardship Standard Version 3.0.

WCFP counties included in the project include approximately 1.63 million acres as shown in the following table:

Table 1: Wisconsin County Forests Seeking FSC Recertification

County	FSC acres
Ashland	40,008
Barron	15,944
Bayfield	169,444
Chippewa	33,107

Clark	132,846
Douglas	272,823
Eau Claire	52,350
Florence	36,709
Forest	10,888
Iron	174,267
Jackson	121,028
Juneau	15,380
Lincoln	100,845
Oconto	43,581
Price	92,236
Sawyer	115,201
Taylor	17,653
Washburn	149,003
Wood	37,593
Total County Forest Certified Acres	1,630,906

1.2 Management Context

The mission statement and the purpose and direction of the County Forest Law as stated in s. 28.11, Wis. Stats:

“ ...to provide the basis for a permanent program of county forests and to enable and encourage the planned development and management of the County Forests for optimum production of forest products together with recreational opportunities, wildlife, watershed protection and stabilization of stream flow, giving full recognition to the concept of multiple use to assure maximum public benefits; to protect the public rights, interests and investments in such lands; and to compensate the counties for the public uses, benefits and privileges these lands provide; all in a manner which will provide a reasonable revenue to the towns in which such lands lie.”

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

- The County Forest Law (s 28.11 Wis. Stats.)
- Statutory authority to engage in forest certification (broadly interpreted): §§23.11, 28.01, 28.07, and 77.80
- DNR Manual Codes and Handbooks
- Wisconsin Pesticide Law (Chapter 94, WI Statutes)
- Use of Pesticides on Land and Water Areas of the State of Wisconsin (WI Administrative Code, Chapter NR 80)
- Wild Animals and Plants Law (Chapter 29, WI Statutes) and WI Administrative Code NR 10
- Wisconsin Water Law: UW Booklet
- Wisconsin Groundwater Law (Chapter 160, WI Statutes)

- Navigable Waters (Chapter 30, WI Statutes)
- Water Quality Standards for Wetlands (Chapter NR 103, WI Administrative Code)
- Wisconsin Shoreland Management Program (Chapter NR 115, WI Administrative Code)
- Endangered and Threatened Species (Chapter NR 27, WI Administrative Code)
- Wisconsin Historic Preservation Laws

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

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

1.2.1 Environmental Context

The following paragraphs describing the environmental context for the Wisconsin County Forest Program are excerpts from the *County Forest Comprehensive Land Use Plan- Environmental Assessment*.

Background and History:

At one time, much of Wisconsin was covered with magnificent stands of pine, hemlock, and hardwoods on the highlands, and cedar, spruce, and balsam on its lowlands. From 1860 to about 1910, these forests provided raw material for a thriving lumber industry. The need to supply lumber for a growing nation, and the lack of sound forest management, resulted in overharvest of the forests and degradation of the landscape. Immigrants rushed to these newly cleared lands, hungry for a place to farm and build their lives. But in just a few years, the soils gave out, catastrophic fires occurred, and many people were forced to seek their fortunes elsewhere. The land was left exhausted and tax delinquent. The Wisconsin County Forest program originated with the taking of these tax delinquent lands.

Present:

The pressures being put on the county forests are becoming more diverse. There are more people and they are increasingly looking to our public lands to provide for their forest product and recreation needs. New technologies are creating recreational opportunities that previously weren't a concern. All terrain vehicle use in Wisconsin has increased markedly with over 200,000 machines registered. The number of registered machines in Wisconsin now exceeds snowmobiles. A segment of the population is also more environmentally conscious and not willing to sacrifice the ecological concerns at the expense of recreation or forest products. More and more people are dividing a static land base into smaller parcels and building second homes and cottages. Seasonal home development increased from 250% to over 2500% in all of the County Forest counties since 1980. Wisconsin's forests are being asked to accommodate all uses and needs by a growing population. User conflicts are becoming more commonplace and controversial. Local governments are constantly evaluating the merits of public land ownership. As the largest public landholder in Wisconsin with 15% of the forestland, the county forests are an integral part of these debates. Introduction of invasive exotic plants and animals, forest fragmentation, recreational user conflicts, and adverse environmental impacts are all products of the increased pressure. These impacts make managing our County Forests and all public lands an increasingly difficult challenge. County Forest planning efforts are essential to addressing the varied impacts to the forest. In turn, the County plans need to be coordinated with other planning efforts including Statewide Comprehensive Outdoor Recreation Plans, Comprehensive Land Use Planning (e.g. smart growth), Wisconsin State Trails Network Plan, Wisconsin Statewide Forestry Plan, the Land Legacy Study, and the Wisconsin Comprehensive Wildlife Conservation Plan.

Physical Environment (topography, soils, water, air)

The portions of the State encompassed by the County Forests were nearly all shaped by past continental glaciation. The Vernon County Forest is the main exception to this. Twenty-two of the 29 Forests are encompassed within the Laurentian Mixed Forest (province 212) of the National Hierarchical Framework of Ecological Units (NHFEU). Clark, Eau Claire, Jackson, Juneau, Monroe, Vernon, and Wood counties are included within the Eastern Broadleaf Forest (province 222) (see Figure 2). These two provinces encompass all of Wisconsin. Province 212 includes the northern parts of all the lake states. The Wisconsin portion of province 212 is characterized by glacial geology including tills, moraines, outwash, lakes, and abundant wetlands. Glacial deposits including clay, sand, and gravel cover obscure bedrock almost entirely.

County Forest soils are generally loams and silts in the northern counties with interspersed areas of sandy soils. An area of red clay soils can be found along the northernmost portions of Douglas, Bayfield, Ashland, and extreme northwest Iron County. These soils are particularly challenging for land managers. The Douglas and Bayfield County Forests are the two primary forests with these red clay soils. County Forests in the central parts of the State have primarily sandy soils interspersed with poorly drained wetlands. See Figure 3 for a generalized soil map of Wisconsin.

Biological Environment

The twenty-nine County Forests cover over 2.35 million acres. Over 84% of this area is forested. The remaining 15+% consists of marshes, grasslands, brush, water, rights-of-way, and developed recreation areas. (see Table 10). Aspen (17%), sugar maple (11%), red maple (11%), red oak (9%), red pine (8%), basswood (6%), and white birch (5%) are the most common individual tree species present. Private in-holdings within the individual County Forest blocking boundaries are relatively common.

The majority of the County Forests are the result of natural regeneration or tree planting that occurred in the early to mid-1900's. Early succession aspen is still a dominant forest type on County Forests. However, mid- to late-successional maple-basswood forests and in some cases white pine forests are replacing early succession aspen-birch and oak forests that dominated the areas from 1940 to 1970. Savannas, barrens, and advanced successional stages are ecosystems that are extremely rare in the State. Management opportunities exist on the County Forests to maintain or restore these components.

Due to fire suppression, forest disturbance patterns have changed dramatically over the past century on the County Forests. Logging, windthrow (and other weather related events (e.g. hail), and disease, are now the main forest disturbance forces. Invasive exotics, like much of the U.S., have or are becoming problematic on County Forests. The gypsy moth, emerald ash borer, garlic mustard, buckthorn, spotted knapweed, and Japanese barberry are some of the exotics that pose a major threat to Wisconsin's forests.

The County Forests play an important role in maintaining large tracts of intact forested lands. Wisconsin forests are being fragmented due to road building, agriculture and urban development. County Forests located in northern Wisconsin, in conjunction with Federal, State, and private land ownerships, make up one of the largest forested tracts in the United States.

1.2.2 Socioeconomic Context

The following paragraphs describing the Socio-economic context for the Wisconsin County Forest Program are excerpts from the *County Forest Comprehensive Land Use Plan-Environmental Assessment*.

Land use (dominant features and uses including zoning if applicable) The State of Wisconsin is comprised of nearly 35 million acres of which 16 million, or 46%, are forested. Public agencies own and manage nearly 16% of all land, and 29% of the forested acreage in Wisconsin. Nearly 7% of the total land base and 15% of the forested land in Wisconsin is in the County Forest program. Land use in the State varies widely, but less so in those 29 counties containing County Forests. Forestry and recreation are the primary two land uses on the County Forests. When ranked by industrial output, forest industry is the #1, #2, or #3 ranked industry in 16 of the 29 counties. Management for forestry purposes is rooted in the County Forest statute (s. 28.11, Wis. Stats) and has been consistent for a number of years. The County Forests are managed actively but sustainably, and continue to grow more trees than they harvest (see Proposed Physical Changes section, #4). Land use adjacent to the County Forests is primarily forestry and tourism-based in the north. Primary residences are much fewer than in the south but seasonal dwellings are common. Agriculture is secondary in the north although it is of greater importance in the northwest. Incorporated cities and towns are relatively scarce in comparison to the southern half of Wisconsin. Central Wisconsin has a higher permanent population with more urban areas, manufacturing and agriculture. Agriculture tends to be a primary land use in southwestern Wisconsin.

Recreational use of the County Forests has experienced far more change over the last several years. From 1993 to 2004 traveler spending increased 155% in those counties with County Forests. This compares to a 114% increase for other Wisconsin counties over that same time frame. This highlights the increased recreational interest in forest-based activities. Forests are more in demand for a variety of uses. The more urbanized areas of Wisconsin rely heavily on the County Forests and other public lands for recreation. Activities such as roller skiing, disc golf, mountain biking, geo-caching and horseback riding were of little consequence 10-15 years ago. Motorized recreation has become more popular, primarily as it relates to all terrain vehicle (ATV) use. There are now more than 200,000 ATV's registered in Wisconsin. Another 10,000 to 15,000 ATV's are sold annually. The number of registered ATV's now exceeds that of snowmobiles and their use on public land is much more controversial. The fact remains that ATVing is a popular recreational activity and the public needs, and at times demands, an opportunity to ride on public lands such as the County Forests. County Forests currently provide approximately 1180 miles of designated ATV trail. This is over 25% of the State-funded total. Additional opportunities on town road routes (connectors) are available. Some Forest policies allow for use on undesignated trails as well.

b. Social/Economic (including ethnic and cultural groups)

Forest industry and tourism, the two primary business sectors impacted by the County Forests, are crucial to Wisconsin. There are over 1800 forest products companies in the State. Forest industry is the largest employer in 28 Wisconsin counties and in the top three of 14 more counties. Over 327 million cubic feet of wood are used in Wisconsin annually. We currently harvest 332 million cubic feet and are the only midwest State that harvests more than they consume. Counties with County Forests are typically more rural, less populated, and have relatively few urbanized areas. The racial makeup of these rural counties is over 90% Caucasian. Incomes are generally less than statewide averages although the more populous counties with County Forests (e.g. Marathon, Eau Claire) approach the norm. The presence of public land and the recreational opportunities it offers are often mentioned as contributing to the appeal of residing in these counties.

c. Archaeological/Historical

Prehistoric human occupation has been documented back to the late Pleistocene era during the retreat of the last glacial ice cover. Numerous cultures have existed in the State over the past 11,000 years. In more recent history, the first signs of a shift from nomadic hunting to a more sedentary lifestyle appeared in 1500 BC to 500 BC. These Indian cultures grew agricultural crops and many also harvested wild rice. From 500 BC to 1000 AD there was an emphasis on agriculture. Many cultural artifacts come from that period. Indian cultures, including the Hopewell Indians, were skillful artisans that created ceremonial objects and textiles. Effigy mound culture left behind numerous ceremonial mounds formed as various animals and shapes. Many of these are still visible today, particularly in southwestern Wisconsin. From 1000 AD to 1600 AD Indian cultures typically set up villages along rivers or wetlands. By 1630, three tribes were residing in Wisconsin. The Winnebago (Ho-Chunk) lived between Green Bay and Lake Winnebago. The Menominee lived along the Menominee River (west of Green Bay). The Santee Dakota inhabited northwest Wisconsin. The first Europeans were arriving in Wisconsin in the form of French fur traders. Tribal wars in the eastern US during this time period resulted in many tribes relocating to Wisconsin. By 1820 overexploitation of northern Wisconsin furbearers caused the fur trade to shift north into Canada. The federal government purchased / bartered Wisconsin lands from tribes by the mid 1800's. Treaties from this era resulted in considerable controversy in the late 1980's and resulted in the retention of many hunting and gathering rights by Chippewa tribes on what are now County Forests. By the middle of the 19th century, reservations housed the bulk of Wisconsin's Native American population. Six major tribes still reside in Wisconsin today, the Ojibwe (Chippewa), Stockbridge-Munsee (Mohican), Oneida, Menominee, Potawatomi, and Ho-Chunk (Winnebago).

Timber and timber-related occupations employed much of the workforce between 1850 and 1920. Agricultural capabilities in northern Wisconsin were promoted late in the 19th century to encourage settlement. In addition, copper and iron ore mining attracted Cornish and Finnish people to the northern third of Wisconsin. Nutrient-poor sandy soils with short growing seasons were not hospitable for traditional row crop farming. These northern farms were generally isolated from one another and were sometimes owned by settlers with little or no farming experience. These isolated settlers were a burden on local services and resulted in some of the first zoning regulations in the State. Lands became tax delinquent and resulted in the creation of the State and County Forest programs in the late 1920's. Twenty-five of the twenty-nine county forests enrolled in the first ten years of the program.

Archaeological or cultural resource locations are confidential and exempt from Freedom of Information Act disclosure so a map of site locations is not provided for review. Cultural records on the State Historical Society database are reviewed for timber sales and other land disturbing activities on the County Forests. See also the individual County Forest Plans for information on local cultural resources.

1.3 Forest Management Enterprise

1.3.1 Land Use

County Forest Comprehensive Land Use Plan 2005 reports “the National Hierarchical Framework of Ecological Units (NHFEU) categorizes Wisconsin into two provinces, the Laurentian Mixed Forest (212) forming the northern half of the State and the Eastern Broadleaf Forest (222). Within each province are sections, subsections and landtype associations that further group land into areas with similar geology, soil types, surface water features, wetlands and historic and potential plant communities.”

1.3.2 Land Outside the Scope of Certification

19 of the 29 County Forests in WCFP are FSC certified. The ten counties not enrolled within FSC are managed according to the same County Forest Law as those certified counties. Adhering to County Forest Law and other DNR requirements assures that these lands outside the scope are being managed in a manner consistent with FSC Partial Certification requirements. Non-certified County Forests include Burnett, Langlade, Marathon, Marinette, Monroe, Oneida, Polk, Rusk, Vernon, Vilas. The WCFP or individual County Forests that are not certified, make no claims that would indicate that these properties are FSC certified. However, some FSC certified counties do have managed forests that are not within the scope of the certified. FSC requires Forest owners or managers to document the reasons for seeking partial certification and ensure that there is no confusion between certified and non-certified lands. Some County Forests, e.g., Juneau, actively manage forests that are not included in the County Forest Program and are not FSC certified. County Forests have not documented reasons for their seeking partial certification. See CAR 2009.8.

1.4 Management Plan

1.4.1 Management Objectives

As detailed in the *County Forest Comprehensive Land Use Plans*, “Natural resources, such as those provided by the County Forest, are the base for addressing the ecological and socioeconomic needs of society. The mission of the County Forest is to manage, conserve and protect these resources on a sustainable basis for present and future generations.

County Forest resources should be protected from natural catastrophes such as fire, insect and disease outbreaks, and from human threats such as encroachment, over-utilization, environmental degradation and excessive development. While managed for environmental needs including watershed protection, protection of rare plant and animal communities, and maintenance of plant and animal diversity, these same resources must also be managed and provide for sociological needs, including provisions for recreational opportunities and the production of raw materials for wood-using industries. Management must balance local needs with broader state, national and global concerns through integration of sound forestry, wildlife, fisheries, endangered resources, water quality, soil, and recreational practices. Management will provide this variety of products and amenities for the future through the use of sustainable forest management practices.”

1.4.2 Forest Composition

The following paragraphs describing the forest composition for County Forests is an excerpt from the *County Forest Comprehensive Land Use Plan- Environmental Assessment*.

Laurentian Mixed Forest (Province 212 -Includes Ashland, Barron, Bayfield, Burnett, Chippewa, Clark, Douglas, Florence, Forest, Iron, Langlade, Lincoln, Marathon, Marinette, Oconto, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vilas, and Washburn County Forests). Three major biomes, the eastern deciduous forest, tall grass prairie, and boreal forest all come together in the Wisconsin portion of the Laurentian Mixed Forest (province 212). This meeting of the three major biomes and diverse landforms created by glaciers in Wisconsin results in a rich diversity of plants, animals, and communities. Species such as white spruce, balsam fir, and quaking aspen reach their southernmost range in northern Wisconsin. Hemlock and beech are not found west of Wisconsin. Forested communities found in this Province include Northern Dry forest, Northern Dry-mesic forest, Northern Mesic forest, Pine Barrens, and Boreal forest.¹³ Approximately 30 dominant tree species occur in this area as a whole, although fewer than ten are usually found in any given community. Forest types representing the late seral stages on the more fertile soils (loams and silt loams) are dominated by mixtures of sugar maple, basswood, yellow birch, and white ash. Red maple, hemlock, and red oak are more minor associates. Mixed stands incorporate conifer species consisting mainly of balsam fir and white pine with hemlock being a more minor associate. Sandy and loamy sand soils are generally dominated by pine mixtures (jack, red and white), aspen, white birch, red maple, and red oak. Wetland forests are common in this Province consisting of both conifer swamps (black spruce, tamarack, and white cedar) and hardwood swamps

(black ash, red maple, and elm). On all types, early successional aspen-dominated forests are common. The County Forests were born out of the cut and burned over, tax delinquent land from the 1930's. Much of this acreage was in aspen.

Eastern Broadleaf Forest (Province 222 - Includes Clark, Eau Claire, Jackson, Juneau, Monroe, Vernon and Wood County Forests). The northern boundary of this province approximates the Tension zone in Wisconsin. This is the area where vegetative communities change from the prairie, savanna, oak, and mixed hardwood forests of the south to the mixed deciduous-coniferous forests of the north. Broadleaf deciduous species are predominant with lesser proportions of conifers when compared to the Laurentian Mixed Forest province. About 32 native tree species can be found, the presence of each varying depending on the environmental characteristics and past disturbance. Over 70% of this province is nonforested. Of the forested portions, Oak-Hickory (44% of forested area) occupies the most land area. Red oak, white oak, black oak, bur oak, and shagbark hickory are common with minor components of red maple, aspen, basswood, paper birch, white pine, and black cherry. Sugar maple, red maple, white ash and black cherry are increasing in abundance due to fire infrequency, tolerance to shade, and ability to regenerate after harvesting. Maple-Basswood totals 25% of the forested area with sugar maple, basswood, and white ash predominating. Lowland hardwood with silver maple, red maple, green ash, swamp white oak, river birch, cottonwood, hackberry, and black willow is found on 11% of the forested land. The aspen-birch type also occupies approximately 11%. Red, white and jack pine is limited to 4% of the forested area but much of that can be found in the County Forests in this province. Aspen-birch (3%) makes up the bulk of the remaining forested area.

1.4.3 Silvicultural Systems

Silvicultural systems employed on County Forests are guided by the DNR Silviculture and Forest Aesthetics Handbook (HB 2431.5). The Wisconsin County Forests span a wide biogeographic extent of the State of Wisconsin as well as all of the major forest types found in the State. As a result, the DNR and County Forests employ a broad range of silvicultural systems in the management of the timber resources found on the County Forests. Silvicultural systems include a full array of even-aged and uneven-aged silvicultural systems. With general guidance found in the Handbook, silvicultural systems are defined by forest cover type. Regardless of the specific system employed on any given cover type within any of the County Forests, the following general objectives apply:

Encourage stands containing the greatest quality and quantity of timber; Encourage vigor within all developmental stages of forest stands; Through modification of silvicultural prescriptions and practices, accomplish desired aesthetic management objectives; Under both even-aged and uneven-aged systems, a fundamental goal is to promptly establish new stands or age-class cohorts with every regeneration entry, relying either upon natural or artificial regeneration, as dictated by site conditions, harvesting method and cover type requirements. Reliance on natural regeneration is most prevalent. Likewise, all intermediate treatments (i.e., harvest entries not categorized as regeneration harvests, such as pre-commercial and commercial thins) are aimed at promoting improved stand health and vigor.

Even-aged regeneration harvests (e.g., clearcutting) are further modified to address aesthetic and wildlife management considerations and objectives. These are commonly addressed through retention of patches or individual trees. Boundaries are designed to discourage long sitelines and to provide aesthetic variety. For even-aged systems, the target rotation ages are generally approximate to or beyond culmination of mean annual increment and are often longer than rotation lengths employed on industrial timberlands in the region.

1.4.4 Organization and Scope

The roles of the *group entity* (DNR) are clearly established in Wisconsin Statutes. According to the *Public Forest Lands Handbook* “Section 28.11, Wisconsin Statutes, requires that the Department provide technical assistance to counties having lands entered in the county forest program”. The most prominent role of DNR in the County Forest Program is headed up by the liaison forester, one per County. The liaison forester is responsible for coordinating the state/county partnership from the state standpoint by administering the county forest law (s. 28.11, Wis. Stats.). The *Public Forest Lands Handbook* reports “The liaison forester is expected to have a high level of technical expertise and function as the Department's primary source for technical assistance and provide technology transfer to county forest personnel. The liaison must fully understand the Department's overall capabilities and activities and maintain a good working knowledge of all facets of their county forest program.”

Responsibilities of the liaison forester include but are not limited to (as detailed in the *Public Forest Lands Handbook*):

- Attend all meetings of the county forest committee.
- Personally render or arrange for appropriate Department technical assistance to be provided for county forest administration.
- Coordinate county forest administration contacts from other Department personnel.
- Compile bi-annual county forest accomplishments of contributing foresters and report to the forestry team leader.
- Administer the County Forest Law
- Participate in establishing annual goals for timber sale establishment.
- Help formulate, investigate, and process applications for lands entered or withdrawn.
- Participate in development of project and variable acreage share loan requests.
- Review and approve all timber sale cutting notices/reports.
- Attend all county forestry committee meetings and any county board meetings as requested.
- Provide technical assistance
- Cruise and mark timber
- Timber sale inspections and Timber sale administration
- Continue development and maintenance of compartment reconnaissance on the county forest including data collection and analysis, records, updating, management information systems, i.e. GIS;
- Function as a catalyst for technology transfer.

The following DNR Divisions and Bureaus also provide assistance to the County Forest Program:

Endangered Resources - Bureau of Endangered Resources
Fisheries Management - Local fisheries biologist
Forest Management - Liaison forester - Field silviculturist
Geographic Information Systems - GIS Coordinator, Division of Forestry
Land Acquisition - Regional real estate agent
Protection: Insects and disease - Regional entomologist/forest pathologist
Fire Management - Local forester/ranger
Recreation Management – Bureau of Parks and Recreation
Grants - Community services specialist

Water Regulations and Zoning - Water regulation specialist
Water Resources, Best Management Practices - Forest Hydrologist, Division of Forestry
Wildlife Management - Local wildlife biologist

The County Forests along with DNR cooperate with the Wisconsin County Forests Association, Inc. (WCFA). This association was incorporated on May 15, 1968 under Chapter 181 of the Wisconsin Statutes, without stock and not for profit. The WCFP Board of Directors is composed of ten delegates elected from the County Forestry Committees who are members of the Association. The association provides a forum for consideration of issues and policy that are common to all of the county committees responsible for their respective County Forest programs, including those programs encompassed under s.28.11 and Chapter 77, Wis. Stats. WCFP also provides leadership and counsel to County Forest administrators and forestry committees through regular meetings and active committees on legislative and recreational issues.

1.4.5 Monitoring System

WCFP and DNR have a multi-faceted monitoring system. There is also a citizen-based monitoring network in the state with support from a DNR grant program. The WDNR monitoring system includes monitoring Best Management Practices (BMPs), use of the Forest Recon Data System/WisFIRS, and the well-established Forest Inventory and Analysis Program (FIA). See Principle 8 for more details.

1.4.6 Estimate of Maximum Sustainable Yield

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

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

1.4.7 Estimated, Current and Projected Production

Harvest on the County Forests has been stable over a number of years at approximately 76% of net forest growth, according to data in the Environmental Assessment (EA).

In 2006 there was 0.41 net growth 0.31 removals cord equivalents per acre on county forests.

In 1996 there was 0.36 net growth 0.23 removals cord equivalents per acre on county forests

“The County Forests could sustainably harvest approximately 61,000 acres annually. Recon inventory indicates a need to examine approximately 75,000 acres for harvest annually. This includes a backlog, most notably on northern hardwood, aspen and scrub oak types. Historically, upon examination, 14,000 of the acres prove to be not ready for harvest as yet. These forest stands may not have grown as quickly as anticipated or the original stand data may have been erroneous. Of the remaining 61,000 acres, a certain percentage are not harvested because they are in areas unsuitable / unfeasible for harvest (e.g. natural areas, river buffers, difficult logging chance) or foresters cannot ensure regeneration of the type (e.g. cedar). Approximately 12,000 acres on the County Forests are withheld from harvest for such reasons. These are local management decisions. Of the remaining 49,000 acres scheduled for harvest annually, the County Forests are cutting 43,400. The shortfall is due primarily to insufficient staff to set up and administer the timber sales.” Source: Environmental Assessment for the 15-year Land Use Plan.

1.4.8 Chemical Pesticide Use

The DNR has prepared and follows guidance on complying with the FSC policy regarding highly hazardous pesticides. The following chart shows the chemical pesticides used on the County Forests.

Pesticides Used on Wisconsin County Forest Lands (2008-09)

Chemical Name	Active ingredients	Permitted by FSC
Accord	Glyphosate	Yes
Accord XRT II	Glyphosate, isopropylamine salt	Yes
Amine 4 2,4-D weed killer	2-4-d, dimethylamine ester	Yes
Arsenal AC	imazapyr, isopropylamine salt	Yes
Buccaneer Plus	Glyphosate	Yes
Chopper 2 herbicide	Imazapyr, isopropylamine salt	Yes
Cornerstone Plus	Glyphosate	Yes
Element 4	triclopyr	Yes
Garlon 4	triclopyr	Yes
Garlon XRT	Triclopyr, butoxyethyl ester	Yes
Killz All	Glyphosate	Yes
Milestone	aminopyralid	Yes
Oust Extra	Sulforeturon methyl, metsulfuron-methyl	Yes
Oust XP	Sulforeturon methyl	Yes
Pathway		Yes
Plateau	imazapic	Yes
Quik Pro	Glyphosate	Yes
Raid Wasp Killer	Imidcloprid	Yes
Rodeo	Glyphosate	Yes
Roundup	Glyphosate	Yes
Roundup Ultra Max	Glyphosate	Yes
Spike 80DF	Tebuthiuron	Yes
Stalker	Imazapyr, isopropylamine salt	Yes
Tordon K	Picloram, potassium salt	Yes
Transline	Clopyralid	Yes

2.0 GUIDELINES/STANDARDS EMPLOYED

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

3.0 THE CERTIFICATION ASSESSMENT PROCESS

3.1 Assessment Dates

The assessment was completed in August 2009 with the field assessment occurring from August 17 – 24, 2009.

Main Evaluation:

3.2 Assessment Team

Dave Wager – FSC Lead Auditor

Mr. Wager is Director of Forest Management Certification for SCS. During his 9 years as Director, Mr. Wager has administered the program and led Forest Management and Chain-of-Custody evaluations throughout the world. Mr. Wager has led assessments of 30 forest management operations worldwide including Minnesota DNR, Pennsylvania State Forests, Massachusetts State Forests, Potlatch Corporation's Idaho Forestlands and Oregon Poplar Tree Farm, Wisconsin County Forests, Collins Pine Company, Department of Defense-Fort Lewis Installation, and operations in Brazil, Canada, Costa Rica, Japan, and Malaysia.

In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 85 active certificate holders covering 30 million acres. In other natural resources work, Mr. Wager played a key role in the development of Starbucks CAFE Practices- a program to ensure procurement of sustainably grown and processed coffee. Mr. Wager has expertise in business and forest ecology (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University) and utilizes both in his position with SCS. While studying forest ecology at Utah State University, Mr. Wager was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth in Utah's Central Wasatch Mountains.

Michael Ferrucci, SFI Lead Auditor

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

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

Gary Zimmer, Audit Team Member; Wildlife Biology Specialist

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

Gary joined the Ruffed Grouse Society in December of 2000 after 18 years with the US Forest Service, working as a District Biologist on the Lakewood/Laona Ranger District. He received his

B.S. degree in wildlife management in 1976 and received a M.S. degree in natural resources in 1979 from the University of Wisconsin – Stevens Point. His M.S. thesis was entitled “The Status and Distribution of the Common Loon in Wisconsin”. An avid outdoorsman, Gary enjoys hunting, fishing, camping, outdoor photography and is a licensed bird bander. Gary is a Certified Wildlife Biologist and recently completed a two year term as Secretary/Treasurer for the Wisconsin Chapter of the Wildlife Society. Gary currently is the chairman of the Habitat Assessment and Management Committee for the Wisconsin Bird Conservation Initiative.

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

JoAnn Hanowski, M.Sc., Audit Team Member; Biology/Ecology Specialist-

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

Kathryn Fernholz, Audit Team Member; Stakeholder Consultation

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

studied at the College of Saint Benedict in St. Joseph, MN and Sheldon Jackson College in Sitka, Alaska.

3.3 Assessment Process

The scope of the assessment included: document review, auditors spending time in the field and office, interviewing management personnel and, as appropriate, interacting with outside stakeholders. To enhance the efficiency and effectiveness of the assessment, the audit team was divided into two two-person teams that traveled to different counties. Stakeholder consultation was done by Katie Fernholz and took place separate from the field assessment. The use of two teams allowed the assessment to view more diverse and geographically dispersed field sites. The audit teams inspected a variety of field sites across 8 FSC certified counties. During the assessment planning the Lead Auditor and the WCFP representatives reviewed the range of field activities and formulated a sampling plan. The Lead Auditor and WCFP representatives first determined appropriate sample areas or geographic strata within which to sample field sites. The Lead Auditor then used randomized selection methods to select a subset of all available sales and assigned a priority number to each site. WCFP staff members worked with the lead auditor to designate the final selection list from this prioritized list and final adjustments were made during the audit to ensure flexibility and allow for additional samples as needed. Local foresters assisted with scheduling appropriate field site visits in a manner that balances efficiency of travel routes, the priority number for sites, and factors designed to assure coverage of key issues under the certification requirements.

3.3.1 Itinerary

Field sites and schedule of site visits:

Monday August 17 *

Chippewa County, 33,107 acres, FSC only – 12:30 – 5 PM

Site 1: Sale 1134

Site 2: Hickory Ridge Trail – co-use county forest road and ATV trail, significant erosion and sedimentation into wetlands including two Kettle Lakes

Site 3: Deer Fly Swamp, proposed State Natural Area within 706-acre Bass Lake Complex, plan (page 900-42) recommends long rotation management.

Site 4: Bass Lake #3 ATV Parking Lot

Site 5: Bass Lake #2 Boat Ramp – erosion from road going into dry portion of kettle lake bed; boat ramp eroding significantly

Site 6: Active Sale, no logger on site

Site 7: Sale 1135 – thinning from below with patches, completed

Site 8: Sale 1133 – Third entry thinning in 48-year old red pine – active harvest

Site 9: Sale 1142-08 – Active harvest including 10 acres of selection and 12 acres nearly completed regeneration harvest for Aspen; Aspen clearcut area has no retention trees and no retained trees around the kettle hole depression wetland (vernal pond)

Tuesday August 18, 8 am to 5 pm *

Northern Team: Price County 93,236 acres, both

Field Tour– Mike Ferrucci and Gary Zimmer, Auditors

- Site 1: Holy Cross Ruffed Grouse Management Area – Timber sold but not harvested, planned aspen clearcut, seed tree harvest in tamarack, and swamp hardwood selection harvest.
- Site 2: Access road into Site 1 – Road is gated and only used as a hunter walking access. Surface is fully vegetated (grassy) and has proper drainage including culverts at one small stream crossing with twin culverts which will need replacing soon.
- Site 3: Solberg Lake County Park – Pine stands have been thinning two times and are due soon; campground and day use area; not ADA compliant but other areas are
- Site 4: Georgetown ATV Trail and Bridge – Significant investment in new ATV trail built with sub-base, running surface, cross-drains, bridges as needed. Impressive bridge and causeway over stream and wetlands.
- Site 5: East Georgetown Stub Road – Newer all-season road that is ditched, crowned, surfaced with crushed rock to meet BMPs.
- Site 6: Informal reserve at end of East Georgetown Stub Road – Hemlock-Pine stand and wetland/vernal pool reserved from harvest but not yet formally designated as a HCVF.

Field Tour– Mike Ferrucci, Auditor

- Site 7: Active Harvest Tract 15-07 – Stand improvement thinning visible from roads and ATV trail. Some incidental gaps, some release of oak. Logger interview confirmed FISTA training and good awareness of BMPs and site protection measures designed into the harvest.
- Site 8: Tract 14-07 – Competed regeneration harvest originally set up in 2003 but not cut until winter 2008-09. Discussion of wildlife retention guidelines; snags and some live trees retained.
- Site9: Steve Creek Waterfowl Flowage – Managed by DNR for wild rice and for waterfowl habitat.
- Site 10: Tract 2-07 – Completed 138 acres selection in northern hardwoods and 17 acres in swamp hardwoods. Canopy gaps observed were all smaller than thirty feet diameter, but were ‘cleaned’. Regeneration abundant including red oak and much sugar maple. Deer populations in this area are very close to goal.
- Site 11: Sculpture Park – Cultural landmark managed by Price County Forestry Department, although not enrolled in the county lands program.

Field Tour– Gary Zimmer, Auditor

Site12: Tract 3-04, Aspen Regeneration Cut, Sale Closed October 17, 2007

Aspen regeneration approximately 10 feet tall, well stocked. All oak, conifer and thornapple reserved. Only a few reserve trees visible, some blowdown of conifers has occurred according to forester. Discussed need to tally and record residual reserve trees, possibly in sale completion report for monitoring and future audits. Viewed recent road closure that has been controversial to some users. Reason for closure is to protect wet road surface.

Site13: 1989 Spruce Plantation along Green Creek Firelane, Area scraped and planted to spruce after poor regeneration occurred. Spruce has been released at least twice including by prison crews. Good growth but not fully stocked with pockets of dense alder present. Original planting was intended to improve aesthetics by increasing conifers in predominant aspen area.

Site14: Tract 12-08, Large, 151 acre aspen regeneration harvest has been marked and sold but not harvested. Area has low stocking level, approx. 50 basal area with high shrub component. Few reserve trees, narrative highlights harvest of all aspen to promote better regeneration. Discussed potential conflicts with new retention guides and possibility of reserving small pockets of aspen to better meet guides.

Small, 10 acre, hardwood selection harvest of inclusion within aspen area. Current basal area 120 with after harvest target of 80 – 85 basal area. Emphasis on marking of basswood poles and sawlogs noted.

Site15: Tamarack/black spruce regeneration harvest. Strip cut around 2000. Good stocking throughout stand of tamarack and black spruce seedlings. Remaining strips to be harvested in near future with black spruce seedlings already visible in understory. Question if some tamarack seed trees are needed to be retained in remaining strips to seed in last strips to be cut.

Southern Team: Eau Claire County 52,530 acres, SFI and FSC

Field Tour– Dave Wager and JoAnn Hanowski, Auditors

Site 1: Tower Ridge Recreation Area. High use recreation area close to Eau Claire; Ski trails, disc golf, horse back- very little management; fee area- with chalet

Site 2: Timber Sale 28-06. 34-acre thinning and regeneration adjacent to rifle club shooting range; clearcut red pine- scarify, seed jack pine; goal of mixed oak jack pine site.

Site 3: Timber Sale 20-08- similar stand to 28-06, snags pushed over with dozer for safety consideration

Site 5: Timber Sale 1561. Harvest of mature jack pine, oak and aspen. Aesthetic buffer left along the roadside.

Site 6: Timber Sale 1601. White pine with access through private land; cut heavy so don't need to return for some time; most stands had 50-60 ba retention; excellent protection of red shouldered hawk nest; wetland area had seasonal restriction. Well done.

Site 7: Timber Sale 1533. 33-acre oak jack pine clearcut; steep slope retained trees kept operator out; small amount of fuel wood harvest (though site not overly clean)

Site 8: Timber Sale 1590. 15-acre clearcut of oak. Objective to regenerate oak. Scarify and bull doze maple; No retention- question on how future sites would meet new guidelines for wildlife tree retention.

Site 9: Canoe Landing State Natural Area; Barren/prairie was budworm salvage harvested and tried unsuccessfully to plant red pine. Decided to make it an SNA and barren/prairies; monitor for KBB and small mammals.

Site 11: Tract 5-08; 58-acre oak and mixed hardwood regeneration. Seed tree patches and wetland buffered out of sale. Logger interview John Nelson.

Site 12: Barrens Area SNA- Coon Fork. Excellent work on maintaining enhancing barrens.

Wednesday August 19, 8 am to 5 pm *

Southern Team: Clark County 132,531 acres, FSC only

- Site 1: Chemical storage facility- chemicals in locked cabinet, MSDS sheets, no FSC prohibited chemicals
- Site 2: Whole tree chip sale with islands and leave all oak.
- Site 3: Timber Sale 476. 30-acre even-aged regeneration of aspen, oak, mixed hardwood. Whole tree chipping job.
- Site 4: Timber Sale 1226. 31-acre Northern Hardwood thinning/gap opening and aspen thinning. Objective maintain as NH stand. Only 600 acres of this type on Clark Forests- and efforts are made to perpetuate this type.
- Site 5: Firewood plots that required intensive site preparation to regenerate because it had converted to brush. Site sprayed with arsenal and glyphosate.
- Site 6: Bald Peak Road. Intensive ATV area to concentrate use.
- Site 7: County I Burn. Good example of using fire to encourage oak regeneration. Excellent kill of competing red maple.
- Site 8: Timber sale contract 1122. Low quality oak thinning / maintenance. Off trail ATV damage
- Site 9: Timber Sale 1-09. 131-acre intermediate thinning and 16-acre shelterwood. Active harvesting site; interview with logging contractor John Denfeld.
- Site 10: Timber Sale 1331. 118-acre regeneration harvest to perpetuate oak and white pine.
- Site 11: Wildcat Lane. County Forest Road with heavy ATV traffic. Excessive berms from ATV traffic despite the road being graded on a frequent basis. Several renegade ATV trails impacting forests along edge of stand.
- Site 12: Timber Sale 1175. 155-acre selective harvest in high use recreation area along lower slopes of Levis Trow Mound. Care taken to avoid steep slopes and minimize recreation impacts. HCVF area on higher slopes not harvested.
- Site 13: Jack pine release. Appeared to be effective release of jack pine using herbicides.
- Site 14: Tract 21-04. Active sale but logger not on-site. Effective oak retention with 20" rule. Minor rutting in one area of the sale as logger crossed a swale.

Thursday August 20, 8 am to 5 pm *

Northern Team: Wood County 37,592 acres, both

- Site #1 – Wood County ATV Area, Seneca Unit of Wood County Forest
600 Acre ATV Area that includes 12 miles of Designated ATV Trail. Only ATV use area on Wood County Forest. Location chosen due to its sandy soils with few wetlands. Much of forested area is red pine plantations that are being managed. Large parking lot present with restroom facilities. Heavily used area by ATV's with some illegal off

- trail use. Little effective law enforcement efforts occurring to prevent illegal activities. Some policing being done by local ATV club, county has no funding or staff to do enforcement. Most of management left to local club that is able to use state ATV registration funds for maintenance.
- Site #2 – Sale 621, Sale is combination of red pine thinning (8 acres) and aspen/oak regeneration harvest (21 acres). Red pine is being thinned for the third time with emphasis to release developing white pine. Regeneration harvest resulted in heavy regeneration of aspen with some sapling white pine and scattered oak and white pine seedlings evident. Deer browsing is limited and wildlife manager Wayne Hall reports current deer populations at goal levels (25 deer/square mile) after years above goal. Note: No BMP statement in sale contract!
- Site #3 – Sale 641, 10 acre Partial overstory removal harvest of large declining red and white oak. Harvested by hand crew in December, 2008. Left some poor quality, high wildlife potential trees as potential seed sources and to promote potential cavities, snags and downed woody debris. Good mixed regeneration of oak/maple and some aspen clones. Liaison forester is monitoring stand yearly. Decking area was developed off road to minimize conflict with adjacent snowmobile trail.
- Site #4 – Sale 633, Selection harvest of 55 acres in red pine, oak and bottomland hardwoods. Site included newly found red shouldered hawk nest. Hawk expert Gene Jacobs along with DNR wildlife manager Wayne Hall brought in for recommendations. No cut zone established around nest site and harvest restrictions put in place during breeding, nesting and fledging period. RMZ established on both sides of Yellow River and forester worked with Ho Chunk archeologist on location of potential Native American settlement.
- Site #5 – Sale 584, Unit B close to Park Road. Aspen regeneration harvest with conifer reserves. High level of retention observed including oak and red/white pine. Unit was 26 acres but entire sale was 59 acres. A buffer strip was established adjacent to Park Road. Aspen, oak, cherry and white pine seedlings observed in good numbers.
- Site #6 – Sale 628, Regeneration harvest of black and white oak. White pine was left along county highway X, in Aesthetic Zone B. Some mature oaks were marked for retention. Harvest released sapling white pine. Aspen and red maple were designated for harvest and oaks marked. A rubber mat was used to cross a wetland to the west of this unit to assist with harvest of an additional unit. Mat was pulled out after harvest completion and no impact to wetland occurred. Berm was put in place after the harvest to reduce motorized vehicle use.
- Site #7 – Sale 590, Southern Unit, Large white pine 50% shelterwood harvest designed to release white pine and oak regeneration. West boundary of stand is along Hiles Wetlands State Natural Area. Limited residual damage occurred on saplings during harvest.
- Site #8 – Hiles Wetlands State Natural Area, large sedge meadow with water control structure on road/dike. Part of complex that includes Skunk Creek Woods SNA and Lyman Marsh.
- Site #9 – Skunk Creek Woods State Natural Area, part of complex that includes Hiles Wetlands SNA and Lyman Marsh. Management plan calls for extended rotation of white pine in this area.

Site #10 – Sale 590, Northern Unit, Oak Shelterwood, Heavy shrub and sapling regeneration that currently favors maple over oak. Regeneration survey has been done by liaison forester. Overstory scheduled for removal but mature oaks are showing more mortality than expected.

Southern Team: Jackson County 120,886 acres, both

Field Tour: Auditor JoAnn Hanowski

Site #1: Timber Sale 11-08: Active sale, oak clearcut. Water quality BMP's were addressed including a stream crossing and an RMZ. Retention was left in the form of islands around pocket wetlands. Little or no snag or green tree retention on other parts of the sale area.

Site #2: Timber Sale 2098. Thinning of 60 year old red pine stand. Row thinning except in area where there was pocket decline. Some oak is regenerating in the plantation rows. Discussed habitat types that occur in Jackson County. They are not recorded on the form.

Site #3: Timber Sale 1999. Clearcut of "overmature" oak/aspens. Very little green tree retention in the sale area. Left a retention island around one wet area.

Site #4: Timber Sale 2111. Clearcut of mature oak stand with some islands of retention.

Site #5: Planting site. Site was planted twice, once to red pine that did not do very well. The second planting was of jack pine and has had better rates of survival than the red pine.

Site #6 Timber Sale 2169. Interviewed skidder operator. Had a first aid kit, but not a spill kit. The harvest description in this site called for retention of all snags, but no greens were left in the sale area.

Site #7 Timber Sale 1994. Aspen clearcut was set to be done on frozen soils. Logger was given approval to enter stand under dry soil conditions. Rain occurred and significant rutting was done to the main skid trail. The logger was asked to fix the trail. A few green trees and snags were left in the sale area.

Field Tour: Auditor Dave Wager

Site #8: Bauer Brockway Barrens- State Natural Area. Burning every 8 years. Undertaking invasive control for spotted knapweed

Site 9: Lake Wazee Recreation Areas- Open Pit Mine Restoration. County maintains infrastructure at this popular recreation site.

Site 10: Timber Sale 2071- Road improvement project- culverts installed; road gated; 36-acre regeneration harvest of aspen and red maple.

Site 11: Timber Sale 2136 and Adjacent Stand: Salvage operation due to 2-lined chestnut borer; numerous snags left; approx 1% of area in island retention

Site 12: Timber Sale 2174: 64-acre oak salvage from 2-lined chestnut borer mortality; Areas of sale without borer mortality were retained.

- Site 13: Timber Sale 2157: 33-acre regeneration harvest. Excellent oak regeneration with a diversity of oak species origination from both stumps and acorns.
- Site 14: Timber Sale 2114: 74-acre acre sale, predominantly pine and spruce thinning with 9-acres of Jack Pine regeneration. Observed two areas of 2114 with excessive rutting. Sale was designated as winter harvest only, but was cut in September.
- Site 15: Knutes Forest Road- Oak thinning/shelterwood sale marked but not cut. Den and cavity trees left.
- Site 16: Jack pine seeding following an arson fire. Seeded 2007. Very good regeneration.

Friday August 21, Audits 7 am-2 pm only *

Northern Team (Ferrucci only): Taylor County 17,000 acres, both

- Site 1: Gerstberger Pines, 20 acre unique tract acquired with forestry funds in 2006 that is a 180 – 200 year old forest of large white pine, red oak, Eastern hemlock, basswood and yellow birch. Tract includes a hiking trail with benches to encourage public use of the site and a parking lot/trailhead adjacent to the tract. No management has been prescribed for this stand.
- Site 2: Sale 561, Tract 3-06, Unit was a 59 acre harvest to promote aspen regeneration. Harvest unit includes a small spruce plantation that was thinned through and a black spruce/tamarack wetland that was worked around. Snags were retained as well as a few long lived conifers and oak.
- Site 3: Sale 566, Tract 5-05. Unit was a 44 acre white spruce plantation that was planted in 1966 on the site of a former farmstead. Harvest was the second thinning of the stand. No sign of disease problem in remnant white spruce.
- Site 4a: Sale 588, Tract 8-08 - 15 acre selection northern hardwood harvest and 100 acre aspen regeneration harvest. Aspen harvest included RMZ protections along stream along west side of stand and red lined buffers around vernal ponds.
- Site 4b: Trout Avenue Count Forest Road: Superb road – crowned, surfaced with crushed gravel, ditched.
- Site 5: Sale 586, Tract 6-08 - Harvest was two step shelterwood with target to regenerate paper birch. Overstory removed early due to decline. Tree length skidding required by operator to prepare site for birch seeding. Regenerated paper birch, maple, ash, oak, and aspen.
- Site 6a: Sale 577, Tract 7-07 - Pocket big tooth aspen regeneration harvest with retention of red oak. Designated ATV Trail goes thru sale, logging ahead warning signs visible on trail. Trail maintained by local club and state ATV funds.
- Site 6b: Sale 577, Tract 7-07 - Active selection harvest in northern hardwoods, trees being felled with processor by a trained logger. Canopy gaps are smaller and less frequent than handbook.
- Site 7: Sale off Bear Avenue. Small stream crossing used to access selection harvest unit. Access restricted to one site and brush used to bridge wetland. Brush removed after sale completion. No visible impact from logging operation to soils but recent ATV use left rut in wetland.

Site 8: Bear Avenue Hemlock Patch. 8 – 10 acre mixed hemlock/white pine/yellow birch stand with vernal pools. Some regeneration of hemlock scattered on area. Stand not “z” d out of Recon. Light harvest on edges to remove competitive maple and aspen. Other team viewed other small hemlock and/or conifer patches held in reserve.

Site 9: Camp 8 Campground, Picnic Area, and Boat Launch

Site 10: Loop Road – Various older treatments; road is well-maintained and meets BMP requirements for roads, including surface, crown, ditches, and cross-drains as needed.

Site 11: Horse Camp – Former gravel pit developed for camping and used extensively by horse riders to access Taylor County’s horse trails.

Site 12: Ice Age Trail – Trail visually buffered from surrounding harvests. ATV are bypassing gate and using trail despite signs and regulations.

Southern Team: Juneau County 15,186 acres, both

Site 1: Bass Hollow Recreation Area. Salvage harvest of blow down in HCVF area- but was consistent with goals to maintain the unit as late successional hardwoods. Salvage was restricted to what could be reached from the road.

Site 2: Timber Sale 425. Mix of red pine plantation thinnings and oak/jack pine regeneration blocks with oak wilt. Regeneration of one small jack pine site left to natural seed in, but there was no scheduled follow-up to monitor success.

Site 3: Timber Sale 407. Regeneration of bottomland hardwood/oak stand with stump sprouts. Boundaries well marked, winter logging, stream protected with buffer and crossing. Regeneration spotty in some areas.

Site 4. 10th Rd 150-acre Aspen clearcut with minimal retention. Harvested in winter of 2006.

Site 5. Timber Sale 436. 55-acre red pine thinning. Oaks retained for diversity and wildlife. Some salvage pockets provided diversity of structure.

Site 6. Kennedy Park. 240-acre older forest area. Managed for recreation and late successional habitat.

Attendees:

Opening Meeting

Northern team: Mike Ferrucci, Gary Zimmer, Auditors; Paul Pingrey, DNR Certification Coordinator

% Southern Team: Dave Wager, JoAnn Hanowski, Auditors; Jeff Barkley, DNR County Forest Program Administrator

Jane Severt, Executive Director, Wisconsin County Forests Association

Monday August 17

Chippewa County #, %

Doyle Richards, Chippewa County Forest Admin
Jim Skorczewski, DNR Cty Forest Liaison
David Staudacher, Chippewa County Forester
John Dunn, DNR Wildlife Manager
Michelle Woodford, DNR Wildlife Biologist
Paul Westegaard, Area Staff Specialist
Steve Edge, Forestry Team Leader
Jane Severt – WCFP Executive Director

Tuesday August 18

Eau Claire County %

John Staszczuk, County Forest Admin
Brooke Ludwig, DNR Liaison
Mike Torud, Parks and Forest Supervisor
Jody Gindt, County Forester
Paul Lokken, Eau Claire Parks and Forestry Committee
John Dunn, DNR Wildlife Supervisor
Paul Westegaard, Area Forest Staff Specialist
Randy Schott, Area Forestry Leader- Black River Falls
Loren Ayers, DNR Endangered Resources
Steve Edge, DNR Forestry Team Leader

Price County #:

Pete Bartelt, Price County Forest Admin
Kyle Schmidt, DNR Cty Forest Liaison
Pat Beringer, DNR Wildlife Manager
Eric Holm, Assistant County Forest Administrator
Corey Verdegan, Price County Forester
Mike Luedeke, DNR Northern Regional Forester
Tom Duke, DNR Northern Region Staff Specialist
Greg Mitchell, DNR Forestry Team Leader
Steve Lorenz, Price County Project Forester

Wednesday August 19

Clark County %

Mark Heil, Cty Forest Admin
Dan Clough, DNR Liaison
Michelle Windsor, DNR Wildlife Manager
Chris Schmitz, DNR forester
Rick Dailey, Clark County Forest Assistant Admin
Jon Holger, Clark County Forestry Technician
Andy Sorenson, Clark County Forestry Technician
Paul Westegaard, Area Forest Staff Specialist

Randy Schott, Area Forestry Leader- Black River Falls
Loren Ayers, DNR Endangered Resources
Steve Edge, DNR Forestry Team Leader

Marathon County #:

Tom Lovlien, Marathon Co Forest Admin
Chad Keranen, DNR Cty Forest Liaison
Cortney Schaefer, DNR Wildlife Manager
Elroy Zemke , Chair Forestry and Recreation County Board, President of WCFP Bd. of Directors
Doug Brown, Assistant County Forest Administrator
Shirley Bargander, DNR Forestry Team Leader

Thursday August 20

Jackson County %

James Zahasky, Cty. Forest Admin
Russell Kind, DNR Cty. Forest Liaison
Michelle Windsor, DNR Wildlife Manager
Dave Spaude, Jackson County Forester
Randy Schott, Area Forestry Leader- Black River Falls
Paul Westegaard – DNR Area Forestry Staff
Gary Schluter – DNR Team Leader
Jane Severt – WCFP Executive Director
Jim Warren – DNR Lands Section Chief - Madison

Wood County #:

Fritz Schubert, Wood County Forest Admin
Steven Grant, DNR Cty Forest Liaison
Wayne Hall, DNR Wildlife Manager
Cliff Randal, Dexter Park Lead Maintenance

Friday August 21

Juneau County%

Brian Loyd, County Forest Admin
Jon Robaidek, DNR Wildlife Manager
Monty Brink, Assistant County Forest Administrator
Mike Warnke, DNR Forestry Team Leader, Juneau
Doug King, Juneau Cty. Forestry Technician
Steve Courtney – DNR Area Forestry Leader

Taylor County #:

Brad Ruesch, Taylor County Forest Admin
Russ Aszmann, Taylor County Forest Assistant Admin

Scott Lindow, DNR Cty Forest Liaison
Mike Luedeke, DNR Northern Region Forester
Tom Duke, Northern Region Forestry Specialist
Mark Berglund, Star News
Larry Glodoski, DNR Area Forestry Supervisor

3.3.5 Stakeholder Consultation

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

- To solicit input from affected parties as to the strengths and weaknesses of the Wisconsin County Forests Program, relative to the standard, and the nature of the interaction between the county forests and the surrounding communities; and
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests.

Principal stakeholder groups of relevance to this evaluation were identified based upon lists of stakeholders from the county forests and additional stakeholder contacts from other sources (e.g., members of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders:

- County forestry agency employees and contractors,
- Adjacent property owners;
- Pertinent Tribal members and or representatives;
- Members of the Regional FSC Working Group/National Initiative;
- Local and regionally-based environmental organizations and conservationists;
- Local and regionally-based social interest organizations;
- Forest industry groups and organizations;
- Purchasers of logs harvested on forestlands enrolled in the program;
- Local, State, and Federal regulatory agency personnel;
- User groups, such as hikers, hunters, ATV users, and others; and
- Other relevant groups.

Prior to, during, and following the site evaluation, a wide range of stakeholders were consulted in regard to their relationship with the Wisconsin County Forestry Program and their views on the management of the county forests. Stakeholders included FSC contact persons, government and non-government organizations involved in forest management, local citizens and groups, employees, contractors, and others. Stakeholders were contacted with notification mailings soliciting comments and inviting participation in the public meeting. Notifications were distributed via email as well as a hard copy mailing. Phone contacts were also made. Stakeholders representing diverse environmental, social and economic interests were contacted during the process and invited to provide comments. Comments were received via meetings and personal interviews “face-to-face”, phone interviews (“Interview”), and through written responses. Individuals contacted but providing no comments and those who did not respond to the request for input are indicated as “No Response” (NR). Individuals providing comments

were asked to provide permission to be listed in the report and additional comments were received from individuals not wishing to reveal their identities and/or requesting that their names not be listed in the report.

Name	Affiliation	Consultation
Greg Bunker	Mohican Nation Stockbridge-Munsee Band	Interview
Ray Burgess	Citizen	Written
Stan Druckenmiller	Madison Audubon Society	Interview
Earl Gustafson	WI Paper Council	Interview
Jon Harris	Douglas Co Forest Admin	Interview
Don Heimke	Florence ATV Club	Written
Barbara Henderson	Henderson Forestry Consulting	Interview
Rachel Jordan	Private Woodland Owner	Interview
Tom Lovlien	Marathon Co Forest Admin	Interview
Dan Meyer	Governor's Council on Forestry	Interview
Ray Perry	Perry Forestry Consulting	Interview
Mark Peters	Florence Co Snowmobile Club	Written
Charly Ray	Living Forest Cooperative	Interview
George Sheppard	Sheppard Forestry Service	Interview
Pat Smith	Florence Co Forest Admin	Interview
Michael Strigel	Gathering Waters Conservancy	Interview
Don Thompson	Don Thompson Forestry Consulting	Interview
Richard Valigura	Integrated Forest Management	Interview
John Withers	Riverside Sawmill, Inc.	Interview

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

The following tables provide a summary of the comments received from stakeholders related to the standards as well as major perspectives and concerns.

Social Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> County forestry personnel participate in land protection training events and conferences. 	Noted
<ul style="list-style-type: none"> County forestry personnel collaborate on statewide policy interests with stakeholders and land protection activities. 	Noted
<ul style="list-style-type: none"> Grassroots citizen involvement in county management lands is a good thing. 	Noted
<ul style="list-style-type: none"> Florence County provides opportunities for public input, but they don't follow through on a lot of the input or requests. 	Although we did not visit Florence County on this assessment, we did not see any evidence of counties facility failing to follow-through.
<ul style="list-style-type: none"> There are good partnerships between the counties and the state. 	Noted
<ul style="list-style-type: none"> More forestry education is needed for the general public. 	County Forests and DNR are currently contributing to public education at levels that meet or exceed the standard.
<ul style="list-style-type: none"> It is appropriate for public lands to be certified; it provides an assurance and auditor verification of public commitment to sustainable forestry practices. 	Noted
<ul style="list-style-type: none"> FSC's new draft standards may not be good for the region. The social aspects of the standards are a concern. 	Not pertinent to this assessment
<ul style="list-style-type: none"> FSC's new draft standards could be difficult to accomplish with limited staff and resources. 	Not pertinent to this assessment
<ul style="list-style-type: none"> FSC's pesticide restrictions could create problems for nurseries. 	Agreed- but outside the scope of this assessment

Economic Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> If all county land is not certified it may be hard to compete in the future with lands that are certified. 	Noted
<ul style="list-style-type: none"> Certification information for chain-of-custody is not incorporated into harvest system with sale tickets or for lump sum sales. 	Team found WCFP to be meeting CoC requirements for sales.
<ul style="list-style-type: none"> Vernon County should become FSC certified 	This decision is entirely up to Vernon County.
<ul style="list-style-type: none"> There isn't a downside to having county lands certified. 	Noted
<ul style="list-style-type: none"> There should be more ATV trails and activities in the Eau Claire County Forests. 	Audit team found the opportunities for recreation across Eau Claire to meet or exceed the standard.
<ul style="list-style-type: none"> Florence County should make more ATV trails available and open up more existing logging roads. 	Audit team found the opportunities for recreation across WCFP to meet or exceed the standard.
<ul style="list-style-type: none"> Certification has allowed county to maintain and expand timber markets; certification raises the bar of forest management. 	Noted
<ul style="list-style-type: none"> County boards are a barrier to certification and don't see the benefits. 	County boards of FSC enrolled County Forests have passed Resolutions permitting FSC certification.
<ul style="list-style-type: none"> Glad to see more mills moving towards certification in Wisconsin. 	Noted
<ul style="list-style-type: none"> Certification creates too much paperwork and not much benefit in price or markets. 	Noted
<ul style="list-style-type: none"> Wisconsin is wise to be on front end of certification with Managed Forest Law (MFL), state and county lands. 	Noted
<ul style="list-style-type: none"> Certification's time has not come. There are no pricing benefits and no market preference. 	Noted
<ul style="list-style-type: none"> The counties should disclose the minimum bid. It's 	Timber sales across

not appropriate to base the minimum on average stumpage values when they are putting up lower quality material.	WCFP have multiple bidders, which is common for most every sale. Thus we did not see evidence of a flawed process.
<ul style="list-style-type: none"> County management is a huge part of the forest base in the state and they are doing a good job. Cut over lands are now providing important income and recreational opportunities. 	Noted

Environmental Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> Shawano County lands are not well managed. 	Not Applicable- County not included in the scope
<ul style="list-style-type: none"> Waukesha County has good management plans. 	Not Applicable- County not included in the scope
<ul style="list-style-type: none"> Marinette County lands are well managed. 	Outside the scope of this audit
<ul style="list-style-type: none"> Oneida County, Burnett County, and Long Lake (in Washington County) do great work. 	Noted
<ul style="list-style-type: none"> Juneau and Wood County Forests are protecting rare, threatened and endangered species and follow BMPS; they could do more to address invasive species. 	Noted
<ul style="list-style-type: none"> Juneau and Wood County Forests are not doing enough to address insect and disease threats, fire risk and fuel loading. 	Team found acceptable levels of activities to address insect and disease threats- see Criterion 6.6.
<ul style="list-style-type: none"> Iron County management should be improved. 	Discussed Iron County performance with DNR- and understand that improvements have been made in the last year.
<ul style="list-style-type: none"> Auditors focus too much on the harvest site without considering the diversity of management and objectives at a landscape scale. 	Auditors reviewed full aspects of management as related to FSC

	standard.
<ul style="list-style-type: none"> Clark, Eau Claire, Jackson, Lincoln, Sawyer and Washburn County Forests are managed in accordance with laws for multiple use. 	Noted
<ul style="list-style-type: none"> Oconto and Marinette County Forests do a good job with multiple use management. Sales are well executed and address sustainable forestry principles. 	Noted

3.4 Total Time Spent on Audit

The assessment was completed using approximately 36 auditor days. Activities included reviewing documents and records, interviewing stakeholders, and carrying out field work, analysis, and reporting.

3.5 Process of Determining Conformance

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

Corrective action requests (CAR's) are issued for every instance of non-conformance. Major non-conformances trigger Major CAR's and minor non-conformances trigger Minor CAR's

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

Major CARs/Preconditions: Major non-conformances, either alone or in combination with non-conformances of other indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out prior to award of the certificate. If major CAR's arise after an operation is certified, the timeframe for correcting these non-conformances is typically shorter than for minor CAR's. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

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

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

4.0 RESULTS OF THE EVALUATION

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

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

Principle/Subject Area	Strengths Relative to the Standard	Gaps Relative to the Standard (CARs and Obs)
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> ▪ SCS audit team observed excellent conformance with applicable government forest management guidelines (including BMP's) ▪ Payments are routinely paid and paid in a timely fashion ▪ DNR carries out financial audits of Counties helping to ensure payments are made. Results of 3-year Financial Audits showed that All Counties are meeting payment obligations. ▪ All Counties take considerable actions to limit illegal and unauthorized activities in the forest. 	<ul style="list-style-type: none"> ▪ Some Counties, e.g., Juneau, actively manage forests that are not included in the County Forest Program, and thus not all managed forests within a County are enrolled in FSC. Counties have not been documented reasons for their seeking partial certification (CAR 2009.8)
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> ▪ All legal rights associated with lands managed by the WCFP are appropriately documented ▪ All County Forests offer exceptional public use opportunities for a large variety of activities. 15-year plans and County Forest websites describe these activities. ▪ Observed that All Counties mark perimeters of harvest units in the field prior to operations. It was clear that the managers were diligent in defining property boundaries prior to any management activities. 	<p>None noted</p>
P3: Indigenous Peoples' Rights	<ul style="list-style-type: none"> ▪ WCFP sent letters to 11 Tribes (as well as Great Lakes Indian Fish and Wildlife Commission GLFWC) deemed to be potentially interested in management of the County Forests. The letters provided contact information for the County Administrators, described the County Forests, the County Forest planning process, and invited participation on identifying archaeological and cultural resources. ▪ DNR conducts consultations with 	<p>None noted</p>

	<p>tribal groups in an ongoing manner, including formal, periodic meetings as well as in-formal conversations and open communications.</p> <ul style="list-style-type: none"> ▪ County Forests are required to check cultural database for all timber sales and that such information be included on the Timber Sale narrative (Form 2460-1A). 	
<p>P4: Community Relations & Workers' Rights</p>	<ul style="list-style-type: none"> ▪ County Forests have stable relationships with contractors and employees indicate satisfaction with the work. ▪ Employment opportunities at DNR and County Forests are non-discriminatory, including with respect to place of residence. ▪ DNR Liaisons and County Forest staff support a large number and wide range of environmental education activities ▪ Public input occurs through the 15 year planning process and during the monthly Forestry Committee meetings. Additionally, as key issues arise, e.g., access planning, public input is sought through different mechanisms. 	<ul style="list-style-type: none"> ▪ None noted
<p>P5: Benefits from the Forest</p>	<ul style="list-style-type: none"> ▪ County Forests have a multi-decade long-track record of continued support of long-term forest management. ▪ Investment and or reinvestment remains at an acceptable level. ▪ WCFP has demonstrated a commitment to the long term management of County forests for diverse environmental and social benefits and economic viability. ▪ County Forests permit non-timber forest product contracts such as sphagnum moss, boughs, tag alder, etc, which primarily benefit small businesses. ▪ County Forests are managed and used for varied recreation uses. Facilities and programs are first-rate. 	<ul style="list-style-type: none"> ▪ DNR staff time contributions to County Forestry are being more carefully controlled, which will result in less staff contributions to County Forestry. ▪ Additionally, a statewide hiring freeze is preventing the DNR from filling positions related to County Forestry. ▪ The audit team is concerned about the sustainability of sphagnum moss harvesting, due to its very slow growth.

	<ul style="list-style-type: none"> ▪ FIA data shows that across the whole County Forest system harvests are approximately 75% of net growth. Considering that overall harvest levels are at 75% of net growth, and the number of acres of special sites is modest- County Forests are still harvesting less than growth. 	
P6: Environmental Impact	<ul style="list-style-type: none"> ▪ All County Forests completed a comprehensive Environmental Analysis as part of the process to develop 15-year Land Use plans. For site/project level environmental impacts, a variety of tools are used to assess and mitigate environmental impacts. ▪ Numerous surveys are completed by the Wisconsin DNR including Karner Blue, wolf surveys, red shouldered hawk, goshawk, osprey, bald eagles, relevé plots on county forests. ▪ All County Forests predominantly utilize natural regeneration, and encourage species that are best suited to the site. All County Forests are managing at the stand level in a manner that is consistent with stated desired future conditions. ▪ Excellent work being done on maintaining and increasing barrens and jack pine on the landscape. ▪ County Forests actively cooperate with the State DNR to protect and manage for native plant and animal communities. ▪ All foresters interviewed knew the primary pests of the forest types under their management and the silvicultural methods needed to maintain vigorous stands as well as needed treatments when pests appear. 	<ul style="list-style-type: none"> ▪ In some cases, the lists of Species of Greatest Conservation Need (SGCN) relevant to each County Forest are too general. More significantly there is a lack of specific management for SGCN - CAR 2009.1¹ ▪ Ecological Management Unit planning approaches (e.g, Clark County) or a comparable approach to better accomplish landscape-level planning should be implemented at Counties where such planning approaches are suitable (e.g., sufficient size, diversity of types, etc). Observation 2009.1) ▪ At least one county was not coding regeneration sites to follow-up monitor despite some apparent regeneration challenges (Observation 2009.2) ▪ In Northern Hardwoods some counties are missing the emulation of small gap disturbance. Observation 2009.3 ▪ Green tree retention guidelines have been added to the Silvicultural Handbook, but they have yet to be implemented. See Major CAR 2009.1.

¹ SGCN lists were compiled and provided to WDNR-FR and WCFA in 2007. This information is available at <http://dnr.wi.gov/org/land/er/wwap/explore/property>.

	<ul style="list-style-type: none"> ▪ This is a conservation action in the new Wildlife Action Plan that will lead to Conservation Opportunity Areas providing habitat connectivity. ▪ RMZ's are systematically implemented. ▪ BMP's are in place and utilized to reduce soil impacts. Rutting guidelines have been incorporated into all timber sale contracts. ▪ All County Forests visited during this audit either use no chemicals or use them on only a small portion (or none) of their lands each year. ▪ All County Forests use native tree species and local genotypes in reforestation efforts. ▪ There is a clear process in place to discourage/limit County Forests from selling off lands 	<ul style="list-style-type: none"> ▪ WCFP should continue its efforts toward encouraging the legislature to develop new programs to reduce deer population densities. Observation 2008.1 ▪ Guidelines for vernal pools and pocket wetlands are being developed, however, in the interim these resources must still be protected. (CAR 2009.3) ▪ Several non-conformances related to BMPs were observed (CAR 2009.4).
P7: Management Plan	<ul style="list-style-type: none"> ▪ 15-year Land Use Plans are completed for All Counties and cover all necessary requirements of Principle 7. ▪ Sale contracts are standardized and include harvest prescriptions and maps. Each sale has a contract that includes prescriptions and detailed specifications of how operations are to be conducted. ▪ plans are active documents and amended periodically (often annually) as necessary ▪ Training records are kept for all employees. Numerous opportunities for a wide array of training through DNR, WCFP, and other organizations. ▪ All 15-year plans are publically available. All DNR guides, procedures, monitoring reports, and other relevant documents are publically available. 	None noted
P8: Monitoring & Assessment	<ul style="list-style-type: none"> ▪ The WISFIRS system provides excellent data collection and monitoring opportunities ▪ RECON is the core of the monitoring activities on County 	<ul style="list-style-type: none"> ▪ Additional steps to monitor changes in occurrences/habitat for rare spp are needed CAR 2009.1

	<p>Forests and the frequency of data collection under Recon follows a schedule not to exceed 20 years. Program-wide, RECON >20 years old has been reduced by over 222,500 acres in last 2 years.</p> <ul style="list-style-type: none"> ▪ DNR has a research bureau that addresses a wide range of ecological issues. 	
P9: Maintenance of High Conservation Value Forest	<ul style="list-style-type: none"> ▪ The Natural Areas Program conducted a coarse level survey of the County Forest system for HCVF. County Forests have also identified their own special sites that they have become familiar with through the long history of surveying (RECON). 	<ul style="list-style-type: none"> ▪ HCVF- that is to be maintained with passive management, is not consistently being removed from the harvest schedule (i.e. zzzz out of Recon) (CAR 2009.6)

4.2 Preconditions

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

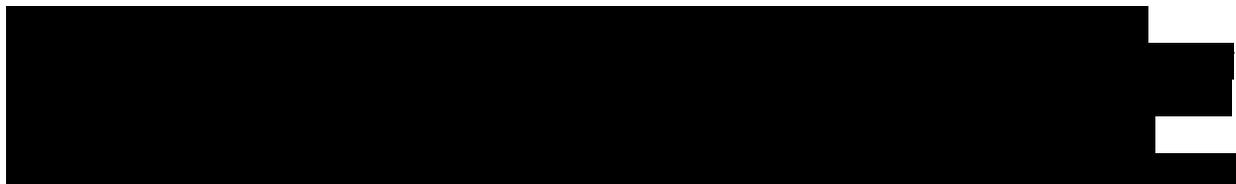
Non-Conformance: 6.3(a)3, 6.3(a)5, 6.3(b)1, 6.3(c)3	
Guidelines for wildlife tree retention have not been implemented- See CAR 2008.2	
Major CAR 2009.2	WCFP must implement the Wildlife retention guidelines as well as implement ways to monitor whether they are being implemented.
Deadline	3 months from finalization of 2009 report
Reference	<i>FSC Indicators</i> 6.3(a)3, 6.3(a)5, 6.3(b)1, 6.3(c)3

Note CARs are issued with sequential numbers. Major CAR 2009.2 is the only major CAR, CAR 2009.1 is minor CAR.

5.0 CERTIFICATION DECISION

5.1 Certification Recommendation

Pending Closure of Major CAR 2009.1



5.2 Corrective Action Requests

Corrective Actions Open At the Start of the 2009 Audit

CAR 2007.3	<p>Develop and implement guidelines for woody debris retention/recruitment that address both woody debris for wildlife and nutrient cycling/soil productivity.</p> <p>Note: per the existing recommendation 2004.5- County Forests are encouraged to also establish criteria for retention of the other aspects (beyond woody debris) of stand-level wildlife habitat elements (e.g., green tree retention, mast trees, den trees, and nest trees).</p>
Deadline	<p>Due to the highly technical nature and the numerous parties involved with this assignment, the CAR timeline is divided into the following phases and milestones (as proposed by WI DNR):</p> <ol style="list-style-type: none"> 1. March 2008: DNR will conduct a literature search and draft language. 2. June 2008: Council representatives and DNR established teams (such as the Silviculture and Public Lands Specialist Teams) will review draft materials. 3. June 2008 – June 2009: Stakeholder input on draft biomass guidelines and possible stakeholder review and input on Forest Management Guideline update. 4. June 2009: Council adopts Forestland Biomass Harvesting Guidelines. Biomass guidelines may be incorporated into an update of the Wisconsin Forest Management Guidelines.
Reference	<i>Indicators 5.3.a, 6.3.b, and 6.3.c</i>
Action Taken By Certificate holder/Auditor Comments (2007-2009)	
<p>County Forest Program Response Progress / Completion</p> <ul style="list-style-type: none"> • Sept. 2007 – Council on Forestry sponsors / charges DNR Division of Forestry to coordinate development of Woody Biomass Harvesting guidelines • Fall / Winter 2007-08: Research and development of draft guidelines by Technical Team (Eunice Padley, Joe Kovach, Carmen Wagner, Sarah Herrick) • Winter 2007-08: Development of Scoping document framing out process for guideline development • Feb. 2008: Formation of Advisory Committee for Woody Biomass guidelines • March 2008: Selection of list of expert reviewers for DRAFT guidelines • April 2008: Distribution of DRAFT Woody Biomass Guidelines and associated white paper to expert reviewers. *Expert Reviewers include the WCFP Certification / 	

Legislative Committee.

- Summer/Fall 2008: Biomass Advisory Committee works with Tech. Team and infuses public feedback into draft guidelines
- 12/3/08: Biomass Advisory Committee approves BHG
- 12/16/08: Council on Forestry approves BHG
- Jan. 2009: Draft BHG Monitoring Options Plan completed
- 3/17/09: Council on Forestry approves BHG Implementation Plan
- Incorporate biomass guidelines into Timber Sale Notice & Cutting Report narrative (Form 2460-001A) and Harvest Inspection Record (Form 2460-002) – Draft narrative completed 6-09.

SCS Findings:

SCS verified that the above actions have occurred. WCFP met the timeline for developing the guidelines and a process for implementation by Spring 2010 is underway. A series of 5 training sessions is occurring between August and December. Harvest sites visited during the 2009 audit did not show a scarcity of biomass related to soil productivity issues. The coarse woody debris component of this CAR is also being addressed in the retention guidelines- See CAR 2008.2.

Status August 2009: CAR Closed.

Background/Justification: Indicator 6.2.b states that *if scientific data indicates the likely presence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive populations, either new surveys are carried out before field-management activities begin or the forest owner or manager assumes their presence and makes appropriate modifications in forest management.*

SCS Observation from Florence County contract 695- block 4: a red shouldered hawk nest was listed in the NHI database. No surveys for red shouldered hawks were done prior to the sale, and the logging contractor identified two trees marked to be cut that had hawk nests in them. Although these trees were not felled, the majority of trees around them were. The nests were not active at the time of the audit, and it remained uncertain what species of hawk had occupied these nests.

American Marten have been identified throughout Iron County (including one timber sale during the 2006 audit), however, stands are not being surveyed for Marten prior to harvest or being managed as if they were present.

Knowledge and utilization of the Wildlife Action Plan and related resources must be further incorporated into timber management. A primary goal of the Wildlife Action Plan is to increase awareness of, and protective measures for, species of greatest conservation need.

CAR 2008.1	WCFP must take actions to ensure conformance with Indicator 6.2.b by utilizing the “Endangered Resources Screening Guidance for the Wisconsin Department of Natural Resources” and by incorporating the Wildlife Action Plan and related resources into management of the County Forests.
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Deadline	Re-certification evaluation- scheduled for 3 rd quarter 2009
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Reference	<i>Indicator 6.2.b</i>
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Action Taken By Certificate holder/Auditor Comments (2007-2009):

Corrective Action

Enhance field level understanding of the Wildlife Action Plan, where to find it, what information is available specific to their County, and how they can utilize that information to implement conservation actions on timber sales and other ground-disturbing management activities.

- Identify Species of Greatest Conservation Need (SGCN) for each County Forest
- Identify Conservation Opportunity Areas (COAs) for each County Forest
- Landscape scale – Identify which COAs have a high % of County Forest and can thereby be impacted the most by County Forest management
- Provide introductory training to foresters on WAP use
- Incorporate DNR Bureau of Wildlife Management and Regional Ecologists into implementation of WAP on County Forests
- Document existing actions on County Forests that already dovetail with WAP
- Incorporate WAP review as part of timber sale establishment process

Progress / Completion

- SGCN lists completed for each County Forest - 2008
- Prepared State Wildlife Grant preproposal (1st round) – *Implementing Priority Conservation Actions on 1.63 million acres in Wisconsin.* (unsuccessful – ranked in middle)- Jan. 2009
- Prepared State Wildlife Grant proposal (2nd round) – WAP Implementation –Eau Claire & Clark County Barrens Restoration Area – Feb. 2009 (decided not to submit)
- COAs mapped for each County Forest and provided to County Forests along with GIS data – Feb. 2009
- Completed broad review of both terrestrial and aquatic COAs and their abundance on County Forests (both in total and FSC-only) – Feb. 2009
- Communication with Bureau of Wildlife Management on WAP implementation on County Forests – Feb. 2009
- Prepared WAP Implementation Plan-County Forests – April 2009
- Training: *WAP Information for Timber Sales and Cutting Reports*: Loren Ayers DNR Bureau of Endangered Resources – March 2009 (Spring County Forest Administrators Conference)
- Training: *WAP and the Clark County Forst 15-Yr. Plan*: Armund Bartz DNR West Central Region Ecologist – May 2009 (Bureau of Endangered Resources workshop)
- Wildlife Action Plan review incorporated into Timber Sale Narrative – June 2009 (DRAFT, not finalized yet)
- Training: *WAP and the Clark County Forest 15-Yr. Plan*: Armund Bartz DNR West Central Region Ecologist – June 2009 (WCFP Summer Tour Bd. of Directors meeting)
- Training: *WAP Implementation on the County Forests*: Jeff Barkley DNR County Forest Specialist – July 2009 (NOR, WCR & NER Liaison meetings)
- Initiated Citizen-based monitoring for biotic inventory work on Eau Claire County Forest – 2009.
- Review of 15 year plans to better document management consistency with WAP – July – ongoing

SCS Findings:

SCS confirmed that the Natural Heritage screening process is properly functioning across the

WCFP as a whole. Evidence of conformance gathered during the 2009 audit included documentation in the 2460 form, confirmation from DNR wildlife biologists, records of NHI training for County and DNR foresters.

As detailed above in the WCFP response, actions are underway to better incorporate the use of WAP information for protecting Species of Concern.

However, work on WAP has not progressed to the necessary point that provides silvicultural/management recommendations for species of greatest conservation need (SGCN). Awareness of WAP and COA's at county forests was variable. As such Minor CAR 2009.1 is issued to ensure continued progress.

Status: CAR Closed. See CAR 2009.1

2008 Observations:

Retention of trees for wildlife considerations (specifically mast, nest, and den trees) has been an inclusion in the Silvicultural and Aesthetics Handbook (HB2431.5 – pages 24-5 and 24-6 Marking Guidelines) for several years. However, current guidance does not address the green tree retention requirements for even-aged management as specified in Indicator 6.3.a.5. Additionally, the retention guidance has been subject to varied interpretation and inconsistent implementation. The statewide Silviculture Committee is in the process of reviewing and updating guidelines relating to stand-level wildlife habitat elements.

CAR 2008.2	Complete the process of updating reserve/retention guidelines, implement these guidelines, and begin to monitor the effectiveness of the implementation.
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Deadline	Re-certification evaluation- scheduled for 3 rd quarter 2009
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Reference	6.3(a)3, 6.3(a)5, 6.3(b)1, 6.3(c)3
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Action Taken By Certificate holder/Auditor Comments (2007-2009):

Progress / Completion

- Draft retention guidelines included in early drafts of Biomass Harvesting guidelines – June 2008
- Decision made to reference the retention guidelines in Biomass Harvesting guidelines but to retain them in the Silviculture Hbk.
- Joe Kovach – DNR Silviculture presents draft retention guidelines to WCFP Spring Administrators Conference – 3-08
- Silviculture committee completes revisions to Chapter 24 in Silviculture Hbk. (Tree Marking & Retention Guidelines) –Jan. 2009

SCS Response:

SCS auditors verified that the above actions occurred. CAR 2008.2 required implementation and a system to monitor the effectiveness of implementation. During the 2009 audit, foresters did not yet comprehend how these new guidelines would be implemented, as such CAR 2008.2 is replaced with Major CAR 2009.2.

Status: Replaced with Major CAR 2009.1

CAR 2008.2	DNR must take action(s) to correct Iron County’s repeated non-conformances. DNR’s actions must be consistent with their “ <i>Involuntary Departure From Group</i> ” procedures as described in the Public Forest Lands Handbook.
Deadline	3 months from finalization of 2008 report
Reference	<i>Indicator 1.1.a., 1.5.a, 6.5.a, C.1.6, and Group Criteria D.1.5</i>
<p>Action Taken By Certificate holder/Auditor Comments (2007-2009): Progress / Completion</p> <ul style="list-style-type: none"> • WCFP’s Executive Director, Chair of Certification committee, President of County Forest Administrators, and WDNR County Forest Specialist appear before Iron County Forestry (ICF) Committee on August 21, 2008 to impress upon ICF the need for compliance. • WDNR, as Group Certification manager, hand carries letter to ICF on 8/21/08 serving as a written warning that ICF must improve its compliance to its own policies and certification standards if they are to remain a part of the FSC County Forest Certification group. • WCFP, on recommendation from its Bd. of Directors and Certification committee, hand carries letter to ICF on 8/21/08 impressing upon the need for ICF to improve its compliance with certification standards. • On 8/25/2008 WDNR assesses a double stumpage penalty of \$1000.00 for the timber harvested without approval from ICF timber sales #2273, #2279, and #2300. • ICF pays double stumpage penalty on 9/17/2008. • Iron County Forestry Dept. implements the following measures to address ongoing problems. <ul style="list-style-type: none"> ○ Presale evaluations are completed using the form jointly developed by Iron Cty. and WDNR. ○ Iron Cty’s timber sale inspection form is used to evaluate active timber sales. ○ All staff are kept up-to-date on the findings from timber sale inspections. ○ Communication with ICF staff about the certification issues and the importance of upholding all of ICF policies on timber sales. ○ Communication with loggers about contract specifications such as marking and the rutting policy. <p>SCS Response:</p> <p>SCS confirmed that the above actions have occurred, and thus closes this CAR.</p>	
Status: Closed	

<p>2008 Observation: WCFP has yet to receive funding for the floral and faunal monitoring, and therefore needs to take additional actions.</p> <p>8.2.c.1. Forest owners or managers periodically monitor the forest for changes in major habitat elements and in the occurrence of sensitive, rare, threatened, or endangered species or communities.</p>	
CAR 2008.4	Find a way to fund the work outlined in the proposed monitoring program “Implementing the Wildlife Action Plan” or develop an alternate approach to improve flora and fauna monitoring. See recommendation 2008.2 for the components of a possible approach.

	<p>The following multi-stepped process could be used to improve flora and fauna monitoring.</p> <p>A. Identify key flora and fauna monitoring questions, issues, and goals for County Forests, for example impacts of deer browse may be a key issue for County Forests;</p> <p>B. Summarize all of the existing monitoring programs and studies which provide information on the questions, issues, and goals defined in step A;</p> <p>C. Describe management actions/changes that can be implemented on County Forests as a result of the existing monitoring results;</p> <p>D. Develop an initial list of monitoring gaps, i.e., questions, issues, goals where information is lacking, and begin steps to monitor these areas.</p>
Deadline	Re-certification evaluation- scheduled for 3 rd quarter 2009
Reference	<i>Criterion 8.1, 8.2</i>
<p>Action Taken By Certificate holder/Auditor Comments (2007-2009):</p> <ul style="list-style-type: none"> • WCFP Certification committee opted to try the recommended alternative approach (see FSC recommendation 2008.2) to address this CAR. - 2009 • Identify Conservation Opportunity Areas (COAs) based on the species of greatest conservation need in the Wildlife Action Plan (WAP) to best identify key flora and fauna monitoring needs for each County Forest. • Communicate COA information and use of WAP to individual counties • Summarize existing research and monitoring being undertaken on floral and faunal monitoring • Identify information gaps where additional monitoring efforts would enhance current management • Continue to run FIA and Recon frequency information for County Forests and stay abreast of other monitoring results on County Forests (BMPs, Karner Blue HCP, Species specific information) • Continue to seek funding for various monitoring initiatives • Continue establishment of relevé' plots on HCVF areas to provide baseline floral information on these unique areas <p>Progress / Completion</p> <ul style="list-style-type: none"> • Completed mapping of Conservation Opportunity Areas (COAs) on each County Forest. CDs of maps provided to all counties – March 2009. • Training associated with COAs and Wildlife Action Plan (WAP) use provided at Spring Administrator's conference by Loren Ayers – March 2009 and also at DNR Liaison meetings – July 2009. • Recon frequency & status information available to counties (WisFIRS Reports 114 & 115) and also an audit item on DNR audits of County Forests (every 3 years). Program-wide, RECON >20 years old has been reduced by over 222,500 acres in last 2 years. • Applied for State Wildlife Grant, USDA Forest Service State & Pvt. Forestry Grant, and Great Lakes Restoration Initiative Grant to develop a statewide ephemeral (vernal) pond management plan including mapping, classification and inventory of ephemeral ponds. Carmen Wagner – DNR Hydrologist (one application unsuccessful, two pending). • Applied for Federal Stimulus funding for County Forest Monitoring pilot in Lincoln, 	

Price, Sawyer and Taylor counties - 2009

- Prepared a State Wildlife Grant proposal for Eau Claire & Clark County Barrens Restoration COA to establish a methodology in order to develop collective conservation goals and actions for COAs on the County Forests and how best to monitor the impacts of those actions. (unsuccessful)
- Wisconsin County Forests Association (WCFP) received a County Forest Sustainable grant to monitor HCVF areas on County Forests (follow through on FSC CAR 2004.11). One field season completed (Bayfield, Sawyer, Taylor and part of Iron Cty.). Second field season in progress (2009). This effort will provide baseline information on HCVFs which are often tied to the same COAs identified in the WAP. Additional grant application completed for 2009.
- BMP for Water Quality Advisory and Field Manual subcommittees formed to initiate revision to BMP for Water Quality (first broadscale revision since 1995).
- Completed crosswalk tying NHI Community types to Natural Communities - 2009 <http://dnr.wi.gov/org/land/er/communities/habitats.asp>
- Compiled sources summarizing existing research & monitoring being undertaken on floral and faunal monitoring. Identified major issues and monitoring gaps pertinent to public land forestry - 2009

SCS 2009 Response:

Upon review of the compilation of forest management monitoring as it relates to Criterion 8.2, - the auditors conclude that the only remaining gap is fauna monitoring required under 8.2.c.1: *Forest owners or managers periodically monitor the forest for changes in major habitat elements and in the occurrence of sensitive, rare, threatened, or endangered species or communities.* While some monitoring covering 8.2.c.1 does occur, it is not being done in a manner that will provide feedback to County Forest programs on habitat for or occurrence of fauna. Current monitoring is statewide and does not reflect the unique way that County Forests are managed relative to other ownerships in the State- e.g, more early successional habitat.

The process that WCVFP outlined for first developing/implementing concrete silvicultural recommendations for SGCN species- and then monitoring the effects of those approaches appears to be an efficient way to address this requirement. See CAR 2009.1 related to management recommendation for SGCN.

Status: Closed- see CAR 2009.1

New Corrective Action Requests- CARs as Result of 2009 Audit

Non-Conformance: Insufficient conformance with Indicator 6.2.b. *If scientific data indicate the likely presence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive populations, either new surveys are carried out before field-management activities begin or the forest owner or manager assumes their presence and makes appropriate modifications in forest management.*

The Wildlife Action Plan (WAP) does not yet provide silvicultural/management recommendations for species of greatest conservation need (SGCN). Awareness of WAP and

Conservation Opportunity Areas (COA's) among County Forest staff was variable. As such Minor CAR 2009.1 is issued to ensure continued progress.

Despite the proper utilization of NHI- there is still insufficient use of other methods to ensure species of special concern are not being impacted. Many of the County Forests have not undergone a comprehensive biotic inventory- suggesting that NHI may be insufficient. The WAP has identified COA's on County Forests for possible occurrences of GCN species. Other than the barrens communities, County Forests have not made consistent efforts to modify forest management in these areas. There is a need for DNR to develop management guidelines for SGCN species.

CAR 2009.1	WCFP (with DNR taking the lead) must provide participating FSC counties with relevant information on SGCN species for each County along with management guidelines for focalspecies.
Deadline	2010 Surveillance Audit
Reference	<i>FSC Indicators 6.2.b; 5.1.c</i>

Non-Conformance: 6.3.c.3. Forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools), and forested riparian areas (see also Criterion 6.5). While most Counties are exceeding their own BMP requirements (which don't require vernal pool and pocket wetland protection) by protecting these vernal pools and small wetlands, there is no required systematic protection for these aquatic resources across the County forests.

In Chippewa County we observed a vernal pool that had been crossed with the skidder and had tops in it. Also observed no retention on one pocket wetland.

CAR 2009.3	Ensure forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools).
Deadline	2010 audit
Reference	<i>FSC Indicator 6.3.c.3.</i>

Non-Conformance: 6.5.b. At a minimum, implementation of BMPs and other resource protection measures will result in the following:

(italics are relevant clauses from Indicator 6.5.b.)

- *Logging operations and construction of roads and skid trails are conducted only during periods of weather when soil is least susceptible to compaction, surface erosion, or sediment transport into streams and other bodies of water.*
-Jackson County- Sales 2114 and 1994. Both sales were required winter harvest only, but were cut in September with County approval. Observed two areas of 2114 with excessive rutting. There was no note of the rutting in timber sale inspection or sale close-out.
- *The transportation system is designed, constructed, maintained, and/or reconstructed to minimize the extent of the road network and its potential cumulative adverse effects.*
- *Access to temporary and permanent roads is controlled to minimize significant adverse impacts to soil and biota while allowing legitimate access, as addressed by Principles 3 and 4 and identified in the management plan.*
- Clark County maverick ATV trails are having cumulative impacts as trails creep into

<p>forest. Restoration is necessary.</p> <ul style="list-style-type: none"> - Clark County Wildcat Road is a County Forest road where ATV traffic results in excessive berms and unsafe travel. - Chippewa Forest County Road- ATV and other traffic was causing the road to unravel and some sedimentation into adjacent water was observed. <ul style="list-style-type: none"> • <i>Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.</i> <ul style="list-style-type: none"> - - Chippewa Forest County Road and boat landings. Chippewa Forest County Road- ATV and other traffic was causing the road to unravel and some sedimentation into adjacent water was observed. 	
CAR 2009.4	Applicable WCFP Counties must take action to correct BMP violations noted in the non-conformance section above (where mitigation is appropriate- i.e., repairing ruts is often not pragmatic) and take measures to improve monitoring of road and harvest conditions to avoid future occurrences and/or more timely correction/mitigation of problems.
Deadline	2010 audit
Reference	<i>FSC Indicators 6.5.b</i>

<p>Non Conformance: Summary of monitoring results is not easily accessible- 8.5.b. <i>Managers of public forests make information related to monitoring easily accessible (e.g., available on websites) for public review.</i> A list of monitoring activities has been summarized and provided to the certification team. The public can obtain some monitoring results from annual reports from County websites. However, a complete summary of results has not been produced or made easily accessible.</p>	
CAR 2009.5	Counties and or DNR must make available a public summary of monitoring results that covers the topics listed in Criterion 8.2 readily available.
Deadline	2010 annual audit
Reference	<i>FSC Indicator 8.5. b</i>

<p>Non Conformance: 9.3.a. <i>Forest management plans and activities are appropriate for maintaining, enhancing and/or restoring attributes that make the area an HC VF.</i> HC VF- that is to be maintained with passive management is not consistently being removed from the harvest schedule (i.e. zzzz out of WisFIRS). Thus, operational protection is dependent upon institutional memory. Some counties have considerable turnover- thus making this a tenuous situation.</p>	
CAR 2009.6	County Forests must develop improved methods of ensuring that HC VF is not inadvertently harvested due to a WisFIRS harvest trigger.
Deadline	2010 annual audit
Reference	<i>FSC Indicator 9.3.a,</i>

Non Conformance: There are non-conformances with FSC Group Criteria:

*1.c. The group entity shall be contractually responsible to the certification body for ensuring that the FSC P&C are fully implemented by all members of the group.
and*

1.d The group entity shall be responsible for ensuring that any conditions on which certification is dependent, and any corrective actions issued by the certification body thereafter, are fully implemented.

During the 2009 audit team concluded that the Group Manager (WI DNR) has missed identifying some significant non-conformances with FSC standards and open or past CARs at Chippewa County.

FSC STD-30-005 (which goes into effect Jan 1, 2010) will have new requirements for group member monitoring)

*7.1 The group entity shall implement a documented monitoring and control system that includes at least the following: ii.Regular (at least annual) monitoring visits to a sample of group members to confirm continued compliance with **all the requirements of the applicable Forest Stewardship Standard**, and with any additional requirements for membership of the group.*

DNR's current internal monitoring is only reviewing open CARs and does not include a field component.

Given the non-conformance with existing group standards, and very likely non-conformance with the pending changes to group certification requirements described in 30-005, improvements to the internal control of the group program are necessary.

CAR 2009.7	WCFP must develop new or improve/expand on existing internal control mechanisms to ensure that all group members are conforming to the FSC standards.
Deadline	2010 annual audit
Reference	<i>FSC Group Criteria C1-1c,1d</i>

Non Conformance: 1.6.b Forest owners or managers document the reasons for seeking partial certification. Some Counties, e.g., Juneau, actively manage forests that are not included in the County Forest Program, and thus not all managed forests within a County are enrolled in FSC. Counties have not been documented reasons for their seeking partial certification.

CAR 2009.8	All FSC certified County Forests with at least 2500 acres of non-certified managed forest must document reasons for seeking partial certification.
Deadline	2010 annual audit
Reference	<i>FSC Indicator 1.6.b</i>

Observations

Observation 2008.1: (reissued) The WCFP in cooperation with DNR and the State of Wisconsin as a whole should take additional measures to reduce the deer population to levels where ecosystem health is not compromised by deer browse.

Observation 2009.1: Clark County (and to a lesser degree Eau Claire) have implemented Ecological Management Unit planning with long-term desired future conditions within a landscape planning context. Other County Forests have not implemented this approach. County Forests that are conducive to landscape scale planning (e.g., larger counties with variability in timber types) should adopt an EMU approach or a something similar to better accomplish landscape-level planning.

Observation 2009.2: At least one county was not coding regeneration sites to ensure follow-up monitoring of natural regeneration- where successful regeneration was uncertain.

Observation 2009.3: Most stands managed under selection methods are currently even-aged and are being gradually converted to uneven-aged structure. Most current selection-system harvest entries are not being designed to aggressively seek regeneration, and gaps have been smaller and less frequent than recommended in the Silviculture Handbook. Harvests that do include “gaps” to release existing regeneration or to encourage additional regeneration are often easy to assess for regeneration status; but systems to document the regeneration are more informal and less timely (RECON done some years later) than they could be.

Observation 2009.4: While amounts of harvesting of sphagnum moss are small relative to the overall inventory of it on County Forests- the rates of its growth are extremely slow. County Forests harvesting sphagnum moss should carefully review the overall sustainability of this harvesting activity.

6.0 SURVEILLANCE EVALUATIONS

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

7.0 SUMMARY OF SCS COMPLAINT INVESTIGATION PROCEDURE

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

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

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

The written Complaint or Appeal must:

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

Written complaints and appeals should be submitted to:

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

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

SECTION B DETAILED RESULTS OF THE FULL EVALUATION

1.0 DETAILED EVALUATION OF CONFORMANCE

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

REQUIREMENT	C/ NC	COMMENT/CAR
P1 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.		
C1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
<p>1.1.a. Forest management plans and operations comply with federal, state, county, municipal, and tribal laws, case law, and regulations.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>All necessary permits are obtained.</i> • <i>There is neither evidence nor substantial claims of continued or intentional non-compliance with laws and regulations that relate to forest management by the forest owner or manager.</i> 	C	<p>15-year Land Use Plans for County Forests include relevant national, local, and administrative requirements. Observed that foresters are cognizant and respectful of laws in their on-the-ground resource management in the 8 County Forests (Chippewa, Price, Eau Claire, Wood, Clark, Jackson, Taylor, Juneau-) assessed during re-certification (hereafter referred to as All County Forests).</p> <p>Additionally, copies of laws, administrative rules, and handbooks are available via intranet; most foresters also maintain printed copies</p>
<p>1.1.b. Forest management plans and operations comply with state Best Management Practices (BMPs) (see Appendix for references) and other government forest management guidelines applicable to the forest, both voluntary and regulatory (see also Criterion 6.5).</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Compliance with state, watershed, county, and planning district regulations.</i> 	C	<p>SCS audit team observed conformance with all applicable government forest management guidelines (including BMP's) at All County Forests), with exceptions noted in Chippewa and Jackson County Forests- See Indicator 6.5.b and CAR 2009.4.</p> <p>Additionally:</p> <ul style="list-style-type: none"> ▪ DNR Liaison forester helps ensure administrative requirements are met ▪ Substantial formal and on-the-job training is undertaken to ensure that foresters have excellent working knowledge of laws, regulations, and policies
<p>1.1.c. Forest management plans and operations meet or exceed all applicable laws and administrative requirements with respect to sharing public information, opening records to the public, and following procedures for public participation.</p>	C	<p>We observed extensive online sharing of information and availability of management records for All County Forests. Procedures for public participation are described in the Public Lands Handbook.</p>

<p>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</p>	<p>C</p>	
<p>1.2.a. Taxes on forest land and timber, as well as other fees related to forest management, are paid in a timely manner and in accordance with state and local laws.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Tax receipts verify that property and excise taxes have been paid.</i> 	<p>C</p>	<p>Payments are routinely paid in a timely fashion DNR carries out financial audits of County Forests helping to ensure payments are made. Results of 3-year Financial Audits showed that All County Forests are meeting payment obligations.</p>
<p>C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</p>	<p>C</p>	
<p>1.3.a. Forest management operations comply with all binding treaties or other agreements to which the U.S. is a party, including treaties with American Indian tribes.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>There is no evidence of non-compliance with relevant treaties and agreements.</i> 	<p>C</p>	<p>Confirmed awareness of applicable treaties. Most relevant treaty to County Forest Program is Chippewa Treaty. Management plans and actions related to Chippewa Treaty issues were in conformance at All County Forests.</p>
<p>C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.</p>	<p>C</p>	
<p>1.4.a. Where conflicts between laws and FSC Principles and Criteria occur, they are referred to the appropriate FSC body.</p>	<p>C</p>	<p>There have been no conflicts between laws and FSC Principles and Criteria.</p>
<p>C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</p>	<p>C</p>	
<p>1.5.a. Forest owners or managers implement measures to prevent illegal and unauthorized activities in the forest.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The land manager paints and posts boundary notices, uses gates, makes periodic inspections, and reports illegal activities to the proper authorities.</i> 	<p>C</p>	<p>All County Forests take considerable actions to limit illegal and unauthorized activities in the forest. Observances of gates, berms, road closures and other techniques including posted signs indicating allowed uses. Mark boundaries in timber sale.</p>
<p>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p>	<p>C</p>	

<p>Applicability note to Criterion 1.6.: Assessment of this criterion is guided by both FSC Policy and Guidelines: Partial Certification for Large Ownerships (FSC POL 20-001 Partial Certification and the FSC Guidelines for Certification Bodies FSC-STD-20-001 (version 2-1)) both available at http://www.fsc.org/en/whats_new/documents/Docs_cent/2.</p>		
<p>1.6.a. Forest owners or managers provide written statements of commitment to the FSC Principles and Criteria. The commitment is stated in the management plan [see 7.1], a document prepared for the certification process, or another official document.</p>	C	<p>All County Forests have made commitments to FSC through County Board Resolutions, which are included in the 15-year plans.</p>
<p>1.6.b Forest owners or managers document the reasons for seeking partial certification.</p>	NC	<p>Some County Forests, e.g., Juneau, actively manage forests that are not included in the County Forest Program, and thus not all managed forests within a County are enrolled in FSC. County Forests have not been documented reasons for their seeking partial certification- CAR 2009.8.</p>
<p>1.6.c Forest owners or managers document strategies and silvicultural treatments for several harvest entries that meet the FSC Principles and Criteria (see Principle 7).</p>	C	<p>Several harvest entries and diverse silviculture treatments were reviewed and documentation demonstrates compliance with the standard. The Silviculture Handbook establishes re-entry cycles for the silvicultural regimes employed on All County Forests. Foresters mark stands for harvest with explicit consideration of the time period to the next entry and the likely nature of that entry. Foresters clearly approach stand treatments with a long term perspective.</p>
<p>P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p> <p><i>Applicability Note: Property rights of private landowners are respected. The forest owner or manager of privately owned land retain their private property rights, while simultaneously honoring the rights of adjacent landowners.</i></p>	C	
<p>2.1.a. Forest owners or managers document the legal and customary rights associated with the forest. These rights include both those held by the party seeking certification and those held by other parties.</p>	C	<p>It is well documented that All County Forests clearly have the long-term right to manage their forests. Property boundaries are appropriately marked prior to timber sales and there is good signage when entering/leaving County Forests. External legal and customary rights are documented in the 15-year plans.</p>
<p>2.1.b. Affected land boundaries are clearly identified on the ground by the forest owner or</p>	C	<p>Observed that All County Forests mark perimeters of harvest</p>

<p>manager prior to commencement of management activities.</p>		<p>units in the field prior to operations. It was clear that the managers were diligent in defining property boundaries prior to any management activities. County Forests display signage informing public of coming on and off County Forests.</p>
<p>C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</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 jurisdiction.</i></p>	<p>C</p>	
<p>2.2.a. The forest owner or manager allows legal and customary rights to the extent that they are consistent with the conservation of the forest resource and the objectives stated in the management plan.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Hiking, hunting, and fishing on non-posted property.</i> • <i>Visiting ancestral gravesites.</i> 	<p>C</p>	<p>All County Forests offer exceptional public use opportunities for a large variety of activities. 15-year plans and County Forest websites describe these activities.</p>
<p>2.2.b. On ownerships where customary use rights or traditional and cultural areas/sites exist, forest owners or managers consult with concerned groups in the planning and implementation of forest management activities.</p>	<p>C</p>	<p>All County Forests consult with concerned groups in the planning and implementation of forest activities. All County Forests provide opportunities for public consultation in long term (15-year plan) and short term (Monthly Forestry Committee meetings). Additionally, All County Forests employ an array of methods (e.g. advisory committee, access planning meetings, open door policy, etc) that collectively assure a substantial level of discourse and consultation with individuals and organizations expressing an interest in the management of county forests.</p>
<p>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	<p>C</p>	
<p>2.3.a. The forest owner or manager maintains relations with community stakeholders to identify disputes while still in their early stages. If disputes arise, the forest owner or manager initially attempts to resolve them through open communication,</p>	<p>C</p>	<p>With respect to informal dispute resolution, good relations with stakeholders are maintained through DNR and County Forests staff participation in the community and the open door policy of the Forest Administrator. County Forests also take steps to notify adjacent property owners of upcoming timber</p>

<p>negotiation, and/or mediation. If negotiation fails, existing local, state, Federal, and tribal laws are employed to resolve claims of land tenure (see Glossary).</p>		<p>sales in an effort to agree on property lines and mitigate potential problems. The laws of the State of Wisconsin provide clear avenues (e.g., the state courts) of recourse for citizens to air and resolve any grievances regarding tenure and use rights. A systematic dispute resolution mechanism is in-place, though not formalized in writing. First, disputes resolution proceeds informally by County Forests providing ample opportunities for appellant to meet and discuss with County Forest Administrator; then formally, though monthly County Forestry Committee meetings.</p>
<p>2.3.b. The forest owner or manager provides information to the certification body regarding unresolved and/or ongoing disputes over tenure and use-rights.</p>	C	<p>Ongoing disputes were discussed during the 2009 audit. None of the disputes were of a nature to result in certification non-conformances. It would be beneficial to have a list of significant ongoing disputes prior to the audit.</p>
<p>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p> <p><i>Applicability Note: Under Principle 3, the terms "tribes," "tribal," or "American Indian groups" include all indigenous peoples in the U.S., groups or individuals, who may be organized in recognized or unrecognized tribes, bands, nations, native corporations, or other native groups.</i></p>		
<p>C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</p>	NA	
<p>3.1.a. On tribal lands, forest management and planning includes a process for input by tribal members in accordance with their laws and customs.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Forest owners or managers utilize tribal experience, knowledge, practices, and insights in forest management planning and operations on tribal lands when requested to do so by the tribal landowner.</i> 	NA	
<p>3.1.b. Forest management on tribal lands is delegated or implemented by an authorized tribal governing body.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>A tribal body that is either elected or based on hereditary appointment authorizes the forest management operations.</i> • <i>Documents verify the authority of the tribal body.</i> 	NA	
<p>C3.2. Forest management shall not threaten or</p>	C	

diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.		
3.2.a. Forest owners or managers identify and contact American Indian groups that have customary use rights or other legal rights to the management area and invite their participation in the forest planning processes, appropriate to the scale and intensity of the operation. (see also Criterion 4.4.)	C	<p>WCFP sent letters to 11 Tribes (as well as Great Lakes Indian Fish and Wildlife Commission GLFWC) deemed to be potentially interested in management of the County Forests. The letters provided contact information for the County Administrators, described the County Forests, the County Forest planning process, and invited participation on identifying archaeological and cultural resources. Thus, All County Forests have met the minimum requirement for this Indicator. Additionally, All County Forests have participated in cultural resources training that included at least one tribal representative.</p> <p>Jackson County is exceeding the requirements by having regular and frequent interactions with the Ho Chunk Tribe to identify and protect archeological and cultural sites.</p> <p>Additionally, at the State level, WDNR maintains ongoing consultation with Tribal groups and organizations in relation to management activities.</p>
3.2.b. Steps are taken during the forest management planning process and implementation to protect tribal resources that may be directly affected by certified operations such as adjacent lands, bodies of water, critical habitats, and riparian corridors as well as other resource uses such as rights to hunt, fish, or gather.	C	<p>Timber Sale handbook (page 32-5) requiring a check of the cultural database be included for all County Forest timber sales and that such information be included on the Timber Sale narrative (Form 2460-1A).</p> <p>Foresters from All County Forests have participated in Cultural Resources Training in either 2008 or 2009. Training was focused on identifying archeological sites and included participation by Ho Chunk Nation archeologist- Jay Toth , and Jerry Smith (Lac Courte Oreilles).</p>
C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
<p>3.3.a. Forest owners or managers make systematic efforts to identify areas of cultural, historical, and/or religious significance. They invite participation of tribal representatives (or other appropriate persons, where tribal entities are lacking) in the identification of current or traditionally significant sites within the forest proposed for certification.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Such efforts include surveying, recording, assessment, establishment, and use of special use and protected areas when and where they are mandated by treaty rights.</i> 	C	<p>See observations under 3.2.a. and 3.2.b. All County Forests utilize the NHI and State Historical Society Database to screen pending land disturbing activities for archaeological resources. Jackson County is sending the timber sale prospectus to the Ho Chunk Nation to identify and protect sites prior to harvesting. Wood County- contacts made with Ho Chunk archaeologist.</p>

<ul style="list-style-type: none"> • <i>Forest owners or managers check existing heritage and cultural databases.</i> • <i>Areas of cultural, historical, and religious significance as well as areas of traditional use, are documented by authorized tribal leaders or their designated representatives.</i> <p><i>For example, areas of special significance may include:</i></p> <ul style="list-style-type: none"> • <i>Ceremonial, burial, or village sites;</i> • <i>Areas used for hunting, fishing, or trapping;</i> • <i>Current gathering areas for culturally important or ceremonial materials, such as Basket materials, medicinal plants, or plants used in dances;</i> • <i>Current gathering areas for subsistence uses, such as mushrooms, berries, acorns, etc.</i> 		
<p>3.3.b. Forest owners and managers consult with tribal leaders (or other appropriate persons, where tribal entities are lacking) to develop mechanisms that ensure forest management operations protect from damage or interference those areas described in 3.3.a. and incorporate these special places into forest management and operational plans.</p>	C	<p>Ho-Chunk Nation participated in 4 cultural training sessions across the State that included extensive participation of County Forests.</p> <p>DNR’s consultations with tribal groups is on-going, including formal, periodic meetings as well as in-formal conversations and open communications, and effective mechanisms exist to protect sites of special significance.</p>
<p>3.3.c. Confidentiality of disclosures is maintained in keeping with applicable laws and the requirements of tribal representatives.</p>	C	<p>All County Forests comply with all applicable requirements for maintaining confidentiality of cultural sites of significance to Native Americans.</p>
<p>C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</p>	NA	<p>There is no evidence to suggest that this Criterion is relevant/applicable to DNR’s management of County Forests.</p>
<p>3.4.a. Forest owners or managers respect the confidentiality of tribal knowledge and assist in the protection of tribal intellectual property rights.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>When traditional ecological knowledge is requested for use in forest management, protocols are jointly developed with local tribes to protect the intellectual property rights of those tribes.</i> 	NA	
<p>3.4.b. A written agreement is reached with individual American Indians and/or tribes prior to</p>	NA	

<p>commercialization of their indigenous intellectual property, traditional knowledge, and/or forest resources. The individuals and/or tribes are compensated when such commercialization takes place.</p>		
<p>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</p>		
<p>C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</p>	C	
<p>4.1.a. Opportunities for employment, contracting, procurement, processing, and training are as good for non-local service providers as they are for local service providers doing similar work.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Forest owners or managers give local goods and service providers an equal opportunity to bid on all contracts and services.</i> • <i>Timber sales are offered in quantities and intervals that allow participation by local companies of all sizes.</i> • <i>Forest owners or managers utilize qualified local employees and contractors.</i> 	C	<p>Employment opportunities at DNR and County Forests are non-discriminatory, including with respect to place of residence. Contractors are obligated to provide equal protection for all employees regardless of whether they are local or non-local. Service providers indicated satisfaction with work conditions and local and non-local conditions are similar.</p> <p>Additional conformance evidence:</p> <ul style="list-style-type: none"> ▪ County Forests distribute bid prospectus to a comprehensive list of potential bidders ▪ County Forests intentionally vary sizes of timber sales to allow access to local companies of varying sizes
<p>4.1.b. Forest work is packaged and offered in ways that create quality work opportunities for employees, contractors, and their workers.</p> <p><i>For example, quality work can include, the following attributes:</i></p> <ul style="list-style-type: none"> • <i>Employee and contractor relationships that are long term and stable;</i> • <i>A mixture of diverse tasks that require varying skill levels;</i> • <i>Opportunities for employees to advance;</i> • <i>A comprehensive package of benefits;</i> • <i>Opportunities for employee and contractor participation in decision-making;</i> • <i>Employment conditions (e.g., remuneration, benefits, safety equipment, training, and workman’s compensation) are as good for non-local workers as they are for local workers doing the same job;</i> • <i>Forest owners or managers provide and/or support training opportunities for workers to improve their skills.</i> 	C	<p>County and DNR jobs are quality positions with competitive compensation and benefits. The workforce demonstrates a high degree of commitment to their work and to the natural resources that they are charged with managing in the peoples’ interest.</p> <p>All County Forests have stable relationships with contractors (e.g., low turnover ratios) indicating satisfaction with the work.</p> <ul style="list-style-type: none"> ▪ Though County employee salaries are typically less than industry, there are other benefits that help offset the differences. ▪ There is a long average tenure of DNR and County forestry staff, indicating that the quality of work life (compensation, work hours, job security, intangibles, etc.) is favorable compared to other employment opportunities
<p>4.1.c. Forest owners or managers contribute to public education about forestry practices.</p>	C	<p>DNR Liaisons and County Forest staff support a large number and wide range of environmental education activities.</p>

<p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The forest is offered as a training and/or educational resource for local people in conjunction with schools, community colleges, and/or other providers of training and education.</i> 		<p>For example:</p> <ul style="list-style-type: none"> • Wood County participated in a “Log a Load for Kids” harvest, which is a fund-raiser and educational program; documented in the December 2008 issue of “Great Lakes TPA” magazine. <p>Wood County’s forester has provided input into the summer programs for children and interpretive trail development in the Dexter County Park.</p>
<p>4.1.d. Forest owners or managers participate and invest in the local economy and civic activities.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Forest owners or managers participate in fund-raisers, field days, and local forestry committees.</i> • <i>Facilities and equipment are regularly maintained and updated.</i> • <i>Out-of-area owners maintain a local office.</i> • <i>The forest owner or manager supports local business development by working with organizations, such as chambers of commerce.</i> 		<ul style="list-style-type: none"> ▪ Annual expenditures on county forest access roads (which are open to all licensed, registered, and inspected motor vehicles) exceed \$293,000 ▪ Each year the County Forests offer over \$20 million in timber sales. ▪ County employees reside in small, mid-sized and large communities throughout Wisconsin and the workforce is engaged in civic activities throughout the state both as private citizens in off hours and as DNR and County representatives during work hours.
<p>4.1.e. Employee compensation and hiring practices meet or exceed the prevailing local norms for work within the forest industry that requires equivalent education, skills, and experience.</p>	C	<p>Though employee salaries for most County Forests is less than industry, there are other benefits that help offset the differences.</p>
<p>4.1.f. Forest owners or managers assure that contractors, subcontractors, intermediaries, and persons hired by them are covered and protected by all state and Federal labor laws regarding discrimination, wages, benefits, and other conditions of employment.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Contracts contain clauses specific to legal coverage and protection.</i> • <i>Owners and managers monitor compliance with laws.</i> • <i>Employees are not discriminated against because of gender, race, religion, age, or disability.</i> 	C	<p>Contracts at All County Forests explicitly require that contractors comply with all applicable labor and worker safety laws. Applicable laws are referenced in contracts and employee handbooks and other documents.</p>
<p>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	C	
<p>4.2.a. The forest owner or manager and their contractors develop and implement safety programs and procedures.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Machinery and equipment are well-maintained</i> 	C	<p>At All County Forests, compliance with OSHA regulations and other safety considerations are an express element of contracts.</p> <p>All County Forests have some training safety program for county staff- including safety meetings held at least annually. Safety records, training reports, and certificates are maintained</p>

<p><i>and safe.</i></p> <ul style="list-style-type: none"> • <i>Safety equipment appropriate to each task is used.</i> • <i>Safety procedures are documented and posted in the workplace.</i> • <i>Education in safety is offered (such as Forest Industry Safety Training Alliance and Game of Logging) .</i> • <i>Contracts include safety requirements.</i> • <i>For employees, safety records, training reports, and certificates are maintained.</i> 		<p>for each employee.</p> <p>The loggers working on visited sites were knowledgeable and had suitable safety equipment in the immediate vicinity. All logging contractors interviewed had received logger training, such as through FISTA; insurance companies require so it is universal.</p>
<p>C4.3 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><i>Applicability Note: This Criterion is guided by FSC guidelines on ILO Conventions (http://www.fsc.org/en/whats_new/documents/Docs_cent/2).</i></p>	C	
<p>4.3.a. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>	C	<ul style="list-style-type: none"> ▪ Freedom of association is unambiguously guaranteed for all DNR and County employees. Right to organize is guaranteed by U.S. and State of Wisconsin Law ▪ For all employees of contractors, the standard contract requires the contractor to comply with all applicable labor laws; as such, freedom of association is assured.
<p>4.3.b. Forest owners or managers and their contractors develop effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p> <p><i>Examples of culturally sensitive mechanisms are:</i></p> <ul style="list-style-type: none"> • <i>Translation and cultural interpretation, when needed;</i> • <i>Cross-cultural training, when needed, to integrate the workforce.</i> 	C	<p>For both County and DNR employees, there is a dispute resolution mechanism for its employees, both union and non-union employees.</p>
<p>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.</p> <p><i>Applicability Note: People and groups directly affected by management operations may include: employees and contractors of the landowner, neighbors, fishers, hunters and gatherers, recreationalists, water users, and forest products processors.</i></p>	C	

<p>4.4.a. On lands with multiple owners, a process is provided that assures the opportunity for fair and reasonable input from the landowners and/or shareholders.</p>	C	<p>There is ample opportunity for public consultation during the 15 year planning process and during the monthly Forestry Committee meetings. Additionally, as key issues arise, e.g., access planning, public input is sought through different mechanisms.</p>
<p>4.4.b. Input is sought in identifying significant sites of archeological, cultural, historical, or community importance, that are to be designated as special management zones or otherwise protected during operations.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>State archeological offices, universities, and local experts have been consulted to identify known areas and develop protection plans.</i> 	C	<p>At All County Forests, County and DNR field staff members adhere to protocols that entail consultation with the state archeologist.</p> <p>At All County Forests, staff had participated in training sessions for identifying and protecting cultural resources. Special sites such as archeological, cultural and historic sites are effectively and consistently protected with special management designations. Site disturbing land management actions are modified or foregone, as necessary, to avoid adverse impacts to archeological, cultural and historic sites.</p>
<p>4.4.c. Viewpoints and feedback are solicited from people and groups directly affected by forest management operations and its associated environmental and aesthetic effects (e.g., logging, burning, spraying, and traffic). Significant concerns are addressed in management policies and plans.</p>	C	<p>All County Forests engage in a full and robust array of both formal and informal stakeholder interactions, dialogue and consultation.</p> <p>Policies and practices are highly responsive to the desires and expectations of the citizens of each County and the State of Wisconsin.</p> <p>Planned harvest sites are an agenda item at some Monthly Forestry Committee Meetings.</p>
<p>4.4.d. Forest owners or managers of large and mid-sized (see Glossary) forests provide opportunities for people directly affected by management operations to provide input into management planning.</p>	C	<p>All County Forests provide ample opportunity for input in management planning through Monthly Forestry Committee Meetings. Many counties had public meetings specific to the 15-year plan revision. 15-year Plans were distributed widely throughout the State to a broad range of stakeholders.</p>
<p>4.4.e. For public forests, consultation will include the following components:</p> <p><i>Note: ‘The public’ includes people and groups directly affected by management operations and all citizens of the relevant jurisdiction.</i></p> <p><i>Applicability Note: For the purposes of indicator 4.4.e each numbered component should be scored separately.</i></p>	C	<p>The following components were all confirmed to be included in management planning considerations.</p>
<p>1. Legislative and historical mandates are included in the plan, and provisions are made for their accomplishment.</p> <p><i>For example:</i></p>	C	<p>Statutory authorities are properly referenced in 15-year Plans</p>

<ul style="list-style-type: none"> • <i>Legal mandates are carried out.</i> 		
<p>2. Clearly defined and accessible methods for public participation are provided in both the strategic (long-range) and tactical (short-range) planning processes, including initial adoption and subsequent amendments.</p> <p><i>Applicability Note: Strategic plans may be very general. Tactical plans are specific and describe candidate stands for proposed silvicultural activities.</i></p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Administrative rules or other documentation are provided for public input.</i> • <i>Some routine activities with little or no environmental impact that appear unlikely to solicit input may be exempted from the procedures of public notification and comment. Examples of such activities include, but are not limited to:</i> <ol style="list-style-type: none"> 1. <i>Maintaining existing buildings or structures</i> 2. <i>Maintaining existing permanent roads or trails</i> 3. <i>Maintaining existing open-land areas (e.g., mowing grass)</i> 4. <i>Minor changes to tactical plans (e.g., small changes to areas affected)</i> • <i>Public agencies solicit public input as early as practicable into the process.</i> 	C	<p>Opportunities and mechanisms for the public to be involved in both strategic (15-year Plans) and tactical (Forestry Committee Meetings) are clearly articulated and broadly understood by the citizenry.</p>
<p>3. Public notification is sufficient to allow interested citizens of the affected jurisdiction and/or other people and groups directly affected by management operations the chance to learn of upcoming opportunities for public review and/or comment on the proposed management.</p>	C	<p>Monthly Forestry Committee meetings provide opportunity to comment on proposed management.</p>
<p>4. The final planning decisions are based on legal mandate, public input, credible scientific analysis, and the productive capacity of the land and are made by professional employees, hired by the public, or other legally authorized parties.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Evidence of how public comments are considered is provided.</i> 	C	<p>County Forest management decisions are based on legal mandate (statutes outlined in the 15-year plans, and other mandates), scientific analysis by County and DNR staff, and consideration of the productive capacity.</p>
<p>5. An accessible and affordable appeals process to planning decisions is available.</p>	C	<p>Appeals to planning decisions are handled through monthly County Forestry Committee meetings. If unable to resolve at the Forestry Committee meeting- then the appellant can raise</p>

<p><i>Note: FSC certification does not preclude any individual or group from seeking legislative or judicial relief.</i></p>		<p>the issue to the Natural Resources Council at the State level.</p>
<p>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p> <p><i>Applicability Note: Provisions of Criterion 4.5. do not evoke protections or liabilities beyond those provided by Federal, state, and local laws.</i></p>	<p>C</p>	
<p>4.5.a. The forest owner or manager attempts to resolve grievances and mitigate damage resulting from forest management activities through open communication and negotiation prior to legal action.</p>	<p>C</p>	<p>At All County Forests an open and transparent public input and planning process helps head off disputes before they become problematic. DNR and County personnel have a long tradition of maintaining open dialogue with a wide array of interest groups as well as individuals. Field observation indicated this occurs frequently especially in property line discussions.</p>
<p>4.5.b. Forest owners or managers and their contractors have adequate liability insurance.</p>	<p>C</p>	<p>As specified in timber sale contracts and/or sale prospectus, County Forests require contractors to have adequate liability insurance.</p>
<p>P5 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>C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</p>	<p>C</p>	
<p>5.1.a. The forest owner or manager is willing and able to support long-term forest management (i.e., decades rather than quarter-years or years), such as planning, inventory, resource protection, and post-harvest management activities.</p>	<p>C</p>	<p>County Forests have a multi-decade long-track record of continued support of long-term forest management. Evidence supporting this statement include:</p> <ul style="list-style-type: none"> ▪ Harvest levels have not been depletionary ▪ The dedicated revenue source for forestry (0.2% real estate tax) is stable and generates an assured revenue stream ▪ Through the County Forestry Aid Fund there are several forms of direct financial assistance available to County Forests including the Administration Grant Program (50% funding of the salary and 50% of the fringe benefit costs of a professional forester in the position of administrator or assistant county forest administrator); Sustainable Forestry Grant

		<p>Program (no match required) to be used for special, short term or unanticipated projects that promote sustainable forestry); Variable Acreage Share Loans; and Project Loans.</p> <ul style="list-style-type: none"> ▪ County Forest Law requires forests to support long-term management in order to be eligible for key funding ▪ Because of the partnership with WI DNR- there are numerous additional resources (e.g., wildlife and forest health experts) readily available.
5.1.b. Responses (such as increases in harvests or debt load) to short-term financial factors (such as market fluctuations and sawmill supply requirements) are limited to levels that enable fulfillment of the management plan.	C	Some recent cuts made to DNR's support of County Forestry (i.e., \$0.10 per acre funds have been reduced to \$0.05 per acre). DNR staff time contributions to County Forestry are being more carefully controlled, which will result in less staff contributions to County Forestry. Additionally, a statewide hiring freeze is preventing the DNR from filling positions related to County Forestry- e.g., DNR Liaison in Iron County. These changes have not resulted in an inability to meet the management plan, but SCS will continue to monitor in future audits.
5.1.c. Investment and/or reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity.	NC	Investment and or reinvestment remains at an acceptable level. Of note Taylor County has a sizable land acquisition fund. There is room for improvement with investment in monitoring of and proactive management of SGCN and listed species. See CAR 2009.1
<p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Investments have been made in forest stand improvement activities and information systems.</i> • <i>Forest conditions confirm that investments are adequate.</i> 		
C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	C	
5.2.a. Opportunities are given to local, financially competitive, value-added processing and manufacturing facilities.	C	<p>The County Forest Program does what it can to encourage local processing under the constraints of their bidding process, e.g., varying the range in size of timber sales. County Forests for the most part cannot effectively encourage local processing.</p> <p>The audit team observed clear evidence of County Forests designing sales to allow successful competition by small operations.</p> <p>County Forests permit non-timber forest product contracts such as sphagnum moss, boughs, tag alder, etc, which primarily benefit small businesses</p>
5.2.b. When non-timber products are harvested, the management and use of those products is	C	Management of non-timber forest products is covered in the 15 –year Plans, see sections 500-11, 500-31, 900-38. The

<p>incorporated into the management plan.</p>		<p>audit team is concerned about the sustainability of sphagnum moss harvesting, due to its very slow growth. This will be assessed during the 2010 audit under the new FSC standards.</p>
<p>5.2.c. New markets are explored for products from common but underutilized forest species.</p>	C	<p>Due to well developed markets, there are no real common, but underutilized species. There are numerous efforts underway to further improve utilization and develop new markets- e.g., bio-mass energy, bio-diesel in Park Falls, For the most part it is up to the bidder to decide where the products will be marketed but the pricing structure helps ensure that products will be directed to the highest use.</p>
<p>C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>	C	
<p>5.3.a. Adequate quantities and a diversity of size classes of woody debris (considered a reinvestment of biological capital under this criterion—not an economic waste) are left on the forest floor to maintain ecosystem functions, wildlife habitats, and future forest productivity.</p>	C	<p>County Forests have been adequately addressing this Indicator through the response to CAR 2007.3. At two biomass harvest sites visited during the 2009 audit- we did not see excessive utilization. The DNR has allocated funds to research the woody debris retention related to biomass harvests.</p>
<p>5.3.b. The loss and/or waste of merchantable forest products is minimized.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Harvested products are handled to minimize potential loss in value.</i> • <i>Waste from on-site processing facilities (e.g., portable sawmills) is minimized and used as an input into a productive process.</i> 	C	<p>Utilization standards in contracts and as observed in the field were appropriate to minimize waste.</p>
<p>5.3.c. Harvest practices minimize residual stand damage.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Soil compaction, rutting, and erosion are minimized.</i> • <i>Provisions that define acceptable levels of residual damage are included in operational contracts.</i> • <i>Low-impact logging techniques are used.</i> • <i>Non-timber forest products are protected from damage by management activities.</i> • <i>Bumper trees are utilized and equipment is selected and used in a way that minimizes</i> 	C	<p>Contract specifications outlined the penalties for excessive residual damage and rutting. Timber sales in 2009 audit had acceptable performance related to residual stand damage across All County Forests. Some rutting was observed at one County— see Criterion 6.5. (CAR 2009.4).</p>

<i>unintentional damage to residual trees.</i>		
C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.		
<p>5.4.a. Forest management diversifies forest uses and products, while maintaining forest composition, structures, and functions.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Compatible uses may include recreation, ecotourism, hunting, fishing, and specialty products.</i> 	C	<p>Recreation use is the most common diversified forest use. There is good evidence that this is occurring across the landscape. County Forests are managed and used for varied recreation uses. Facilities and programs are first-rate; for example:</p> <ul style="list-style-type: none"> • Price County Forest Management Plan contains maps of recreation sites, including “Intensive Recreation Areas (3 Campgrounds, Picnic Areas, Swimming Areas, Boat Landings, Waysides, and Shooting Areas) Managed Trail Areas, and Recreation Opportunities for People with Disabilities”. There are also 6 parks, 411 miles of snowmobile trail and 11 miles of ATV trails. The ATV trails have been constructed in the last two years to a high standard (rock base, crushed rock surface, drainage culverts, and a significant wooden bridge spanning 800 feet of wetlands/stream. The plan includes management direction for all of these areas as appropriate. • ATV use on the Chippewa County Forest is closed unless posted open”; there are 19 miles of designated roads. • Each county forest management plan contains maps of recreation sites, including “Managed Trail Areas, Formal Recreation Areas, Funded Snowmobile Trails, Funded ATV Trails, and Special Use Areas. The plans include management direction for all of these areas as appropriate. <p>Management Plan Section 510.5 lists “Intensive Recreation Areas” for each county’s plan.</p>
<p>C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p> <p><i>The Working Group considers that this criterion is sufficiently explicit and measurable, so does not require indicators.</i></p>	C	See Criteria 6.3 and 6.5.
C5.6. The rate of harvest of forest products shall not exceed levels that can be permanently sustained.	C	
5.6.a. The sustainability of harvest levels is based on growth and regeneration data, site index models, soil classification, and/or desired future conditions. The required level of documentation is determined	C	Harvest levels are set based on area control. Growth and regeneration data, site index models, soil classification, and desired future condition- all factor into determining when a given stand will be harvested.

<p>by the scale and intensity of the operation.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Stocking rates, growth rates, and removal volumes conform to projections of the long-term written management plan.</i> • <i>The age-class distribution (see Glossary) required for a sustainable-yield volume is justified by data.</i> 		
<p>5.6.b. After the species composition and the age-class (see Glossary) distribution commensurate with long-term sustainability have been achieved, harvest and growth records demonstrate that the volume harvested during any 10-year span is less than the net growth accumulated over that same period. Exceptions to this constraint may be granted to forest owners or managers whose periodic cycle of re-entry is longer than 10 years. In such cases, allowable harvest is determined by examining the volume of re-growth and removal since the previous harvest and the forest owner or manager's commitment to allow an equivalent amount of re-growth before additional harvests.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Rapid growth rates in younger forests are not used as the sole justification for the harvest of slower-growing, older forests.</i> 	C	<p>Species distribution and balanced age classes have yet to be achieved. County Forests are working to adjust age-class distribution., e.g. some County Forests are still treating back logs.</p> <p>FIA data shows that across the whole County Forest system harvests are approximately 75% of net growth. Documentation of annual harvest trends in relation to the sustainable forest management plan.”</p> <ul style="list-style-type: none"> • 2006: 0.41 net growth, 0.31 removals in cord equivalents per acre on county forests • 1996: 0.36 net growth, 0.23 removals in cord equivalents per acre on county forests • “The County Forests could sustainably harvest approximately 61,000 acres annually. Recon inventory indicates a need to examine approximately 75,000 acres for harvest annually. This includes a backlog, most notably on northern hardwood, aspen and scrub oak types. Historically, upon examination, 14,000 of the acres prove to be not ready for harvest as yet. These forest stands may not have grown as quickly as anticipated or the original stand data may have been erroneous. Of the remaining 61,000 acres, a certain percentage are not harvested because they are in areas unsuitable / unfeasible for harvest (e.g. natural areas, river buffers, difficult logging chance) or foresters cannot ensure regeneration of the type (e.g. cedar). Approximately 12,000 acres on the County Forests are withheld from harvest for such reasons. These are local management decisions. Of the remaining 49,000 acres scheduled for harvest annually, the County Forests are cutting 43,400. The shortfall is due primarily to insufficient staff to set up and administer the timber sales.” Source: Environmental Assessment Jackson, Juneau, Eau Claire, Price, Wood, and Taylor County Forests are harvesting fewer acres than the allowable harvest target. All other counties have justified cases when harvests exceed growth, generally to rectify harvest backlogs or to balance age-class distribution. <p>The allowable harvest levels have been adjusted downward to</p>

		accommodate unique sites with minimal timber harvests. Considering that overall harvest levels are at 75% of net growth, and the number of acres of special sites is modest- County Forests are still harvesting less than growth.
5.6.c. If rates of harvest are temporarily accelerated to compensate for or prevent unacceptable mortality, or in cases of salvage operations (see Indicator 6.3.c.4), the rate of future harvest is recalculated accordingly to meet desired future conditions, and the adjusted rate of harvest is implemented within three years of the temporary acceleration.	C	This is accounted for by recoding stands in WisFIRS.
P6 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.		
C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations. <i>Applicability Note: Small forest owners or managers who practice low intensity forestry may meet this requirement with brief, informal assessments. More extensive and detailed assessments (e.g., formal assessments by scientists) are expected by large forest owners or managers and/or those who practice more intensive forestry management (see Glossary).</i>	C	
6.1.a. Using credible scientific analyses and local expertise, an assessment of current conditions is completed to include: <ul style="list-style-type: none"> • Disturbance regimes and successional pathways; • Unique, vulnerable, rare, and threatened communities; • Common plants, animals, and their habitats; • Sensitive, threatened, and endangered species and their habitats; • Water resources; and • Soil resources (see also Indicators 7.1.a and b). 	C	All County Forests completed a comprehensive Environmental Analysis as part of the process to develop 15-year Land Use plans. For site/project level environmental impacts, a variety of tools are used to assess and mitigate environmental impacts. These include: <ul style="list-style-type: none"> ▪ Natural Heritage Inventory identifies rare species and their habitats and is reviewed prior to project implementation; ▪ The 2460-1 timber sale form includes a narrative section that briefly discusses environmental impacts ▪ Kotar habitat classification system is widely used- which identifies successional pathways ▪ County Forests consult with species experts (raptor, Karner

		<p>Blue specialists) and DNR biologist on a range of issues.</p> <p>All of the items under 6.1.a are covered through the collection of environmental assessment activities described above.</p>
6.1.b. Using available science and local expertise, the current ecological conditions are compared to both the historical conditions and desired future conditions within the landscape context. This comparison is done by employing the baseline factors identified in 6.1.a.	C	Kotar habitat typing is used to assess the historical conditions of a stand.
6.1.c. Prior to the commencement of management activities, potential short-term environmental impacts and their cumulative effects are evaluated.	C	At the project level, timber sale form 2460 includes analysis on potential site impacts and is reviewed by staff specialists prior to implementation. Significant impacts to water resources are addressed in water quality permitting process.
6.1.d. Using assessments derived from the above information, management options are developed and implemented to achieve the long-term desired future conditions and ecological functions of the forest (see also Criterion 7.1).	C	Desired future conditions are largely defined by goals for forest composition and age-class distribution. These desired future conditions are explained in the 15-year Land Use Plans. WisFIRS is designed to ensure that management options to meet these goals are implemented.
C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
<p>6.2.a. Although species that are state and/or Federally listed as threatened, endangered, of special concern, or sensitive, and their habitats are identified, their specific locations remain confidential.</p> <p><i>Note: On public forests and large private forests, the general locations of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species are made available to the public.</i></p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <i>The forest owner or manager has contacted the state natural heritage program (or its equivalent) to obtain a list of listed species and their habitat or community type to document their presence or potential presence.</i> 	C	<p>Data remains confidential in policy and in practice at All County Forests. Observed conformance with this Indicator in Eau Claire during the 2009 audit.</p> <p>Locations of rare features are pixelized up to a township section in data that are accessible by the public. NHI database identifies species locations and is utilized across all County Forests. Data remains confidential for sensitive species. The data base is only accessible to managers.</p>

<ul style="list-style-type: none"> • <i>An on-the-ground survey for listed species has been conducted.</i> • <i>The locations of such species are mapped.</i> • <i>Management plans provide descriptions of activities appropriate for maintaining such species' habitat(s).</i> • <i>Management activities are compatible with endangered species recovery plans and/or habitat conservation plans.</i> • <i>Evidence of communication and/or collaboration with relevant experts is demonstrated.</i> • <i>The forest owner or manager participates in programs to protect listed species.</i> • <i>Forestry staff receives training in the identification of listed species and their habitat requirements.</i> 		
<p>6.2.b. If scientific data indicate the likely presence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive populations, either new surveys are carried out before field-management activities begin or the forest owner or manager assumes their presence and makes appropriate modifications in forest management.</p>	<p>NC</p>	<p>The audit team observed good overall conformance with the NHI process across the County Forests. DNR biologists were consistently consulted and surveys were done where necessary- when NHI hits came up. There was one isolated incidence in Chippewa on Sale 1134-08- where this did not occur (CAR 2009.7).</p> <p>Despite the proper utilization of NHI- there is still insufficient use of other methods to ensure species of special concern are not being impacted. Many of the County Forests have not undergone a comprehensive biological inventory- suggesting that NHI may be insufficient. The Wildlife Action Planning process has identified Conservation Opportunity Areas on County Forests for possible occurrence of species of special concern. Other than the barrens communities, County Forests have not made meaningful efforts to incorporate this information into forest management decisions. However, this is largely due to the lack of a forest relevant list of species and management guidelines for those species- CAR 2009.1.</p>
<p>6.2.c. For management planning purposes, forest owners or managers of publicly owned and large privately owned forests use, participate in, or carry out on-the-ground assessments for the occurrence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The forest owner or manager uses an appropriate survey for listed species.</i> 	<p>C</p>	<p>Numerous surveys are completed by the Wisconsin DNR including Karner Blue, wolf surveys, red shouldered hawk, goshawk, osprey, bald eagles, relevé plots on county forests. County Forests allow the State to survey on County Forests, and many County Forests actively participate.</p>
<p>6.2.d. Where they have been identified, state and/or</p>	<p>C</p>	<p>All County Forests are meeting this Indicator. Examples of</p>

<p>Federally listed as threatened, endangered, of special concern, or sensitive species and their habitats are maintained and/or restored. Multiple-use management activities are acceptable, where the law allows, in these species' habitat areas to the extent that they are compatible with maintenance and restoration of the species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Within the context of existing landscape and ownership patterns, conservation zones for listed species and other protected areas are arranged to enhance the viability of habitats, including their connectivity.</i> 		<p>conformance include</p> <ul style="list-style-type: none"> • Karner Blue Butterfly (KBB) Habitat Conservation Plan in place and implementation occurring on known county locations. • County Forests working closely with DNR wildlife managers and species specialists on reducing/minimizing impacts to woodland raptors (e.g. northern goshawk and red-shouldered hawk). • A biotic inventory of wetland habitats was completed on the Chippewa County Forest that provided information on the locations of rare species. <p>SNA's are designed to protect or restore habitat for rare ecological species. The species and habitats are protected and enhanced if possible.</p>
<p>6.2.e. If a state and/or Federally listed as threatened, endangered, of special concern, or sensitive species is determined to be present, its location is reported to the manager of the species' database.</p>	C	<p>There is a new online reporting form on NHI. New locations are reported for these rare elements, however there is a considerable back-log in entering data into the database. The backlog has been addressed through a CAR on the FSC certification of the State lands.</p>
<p>C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	C	
<p>C6.3.a. Forest regeneration and succession</p> <p><i>Applicability Note: Indicators 6.3.a.1. through 6.3.a.4. are intended to be applied sequentially.</i></p>	C	
<p>6.3.a.1. Forest owners or managers make management decisions using credible scientific information (e.g., site classification) and information on landscape patterns (e.g., land use/land cover, non-forest uses, habitat types); ecological characteristics of adjacent forested stands (e.g., age, productivity, health); species' requirements; and frequency, distribution, and intensity of natural disturbances.</p> <p><i>Applicability Note: This indicator may apply only marginally to managers of small and mid-sized forest properties because of their limited ability to coordinate their activities with other owners within the landscape or to significantly maintain and/or improve landscape-scale vegetative patterns.</i></p>	C	<p>All of the factors in 6.3.a.1 are evaluated and considered when the managers make the decision on what prescriptions will be carried out on the properties. This information is available in a number of documents including the Silvicultural Handbook . Land managers utilize Kotar Habitat Classification System in assessing land capabilities. Field audit demonstrated a full range of management options being implemented that address local management goals and objectives.</p> <p>Emulating frequency, distribution, and intensity of natural disturbances is an area where there is room for improvement. Even-aged treatments on County Forests are "cleaner" (i.e., less snags, coarse wood, and/or green tree retention) than what historical disturbance events would have likely produced. A study of natural origin (post fire) aspen stands in Canada showed young stands having approximately 19.1 snags/ha and 48.5 m³/ha of coarse DWM. Fire and wind events also tend</p>

		<p>to lead to patchier disturbances than those created by clearcuts. Major CAR 2009.2 covering retention addresses this concern.² In Northern Hardwoods some counties are missing the emulation of small gap disturbance.</p>
<p>6.3.a.2. Silvicultural practices encourage regeneration that moves the forest toward a desired future condition, consistent with information gathered in 6.3.a.1.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Native species suited to the site are selected for regeneration.</i> • <i>Within five years of a regeneration harvest, adequate regeneration exists to move the stand toward desired future conditions. Exceptions are noted and documented.</i> <p><i>Note: Development of a forest that is capable of natural regeneration, based on desired future conditions, is encouraged.</i></p>	C	<p>All County Forests predominantly utilize natural regeneration, and encourage species that are best suited to the site. With the exception of a lack of gaps creation in Northern Hardwoods, All County Forests are managing at the stand level in a manner that is consistent with stated desired future conditions.</p> <p>In the majority of cases, annual management planning is done at the stand level within the stands produced by Recon with little consideration of the broader ecological context in which these stands exist. Current management does produce age class diversity over the landscape, although it is debatable how much of this is planned and how much is simply a result of Recon output. Clark County (and to a lesser degree Eau Claire) have implemented Ecological Management Unit planning with long-term desired future conditions within a landscape planning context. Other County Forests have not implemented this approach (Observation 2009.1). At least one county was not coding regeneration sites to follow-up monitor despite some apparent regeneration challenges Observation 2009.2</p> <p>Excellent work being done on maintaining and increasing barrens and jack pine on the landscape.</p>
<p>6.3.a.3. Measures are taken to ensure the retention of endemic and difficult-to-regenerate species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Deer populations are controlled to enhance successful regeneration.</i> 	C	<p>Each 15-year plan has a section that addresses this Indicator. County Forests are making solid efforts at this with white birch, oak, jack pine, hemlock, tamarack, etc.</p> <p>High deer populations still present significant challenges to achieving desired future conditions in many areas. Deer continue to have an impact in the regeneration of certain tree and plant species especially in specific areas. In almost all of the state, deer populations are above established goal levels and efforts should be made to keep populations at these goals. The State has discontinued a key program (Earn a Buck) to move population toward goal.</p> <p>Actions were taken by WCFP, though mostly unsuccessful, to convince the legislature to develop new programs to reduce deer population densities. Observation 2008.1 will be continued with the re-award of certification.</p>

² Philip C. Lee, Susan Crites, Marie Nietfeld, Hai Van Nguyen, J. Brad Stelfox (1997) CHARACTERISTICS AND ORIGINS OF DEADWOOD MATERIAL IN ASPEN-DOMINATED BOREAL FORESTS. Ecological Applications: Vol. 7, No. 2, pp. 691-701.

<p>6.3.a.4. Across the forest, or the landscape in which it is located, management actions lead to a distribution of successional stages, age classes, and community types appropriate to the scale and intensity of the operation and desired future conditions.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Large forests are managed so that large, contiguous, and interconnected patches of habitat are well distributed across the landscape, in such a way as to allow dispersal of species sensitive to fragmentation.</i> • <i>Within a context of liability and public safety, large forests and public forests are managed to allow the occurrence of natural components, structures, and disturbance regimes.</i> 	C	<p>County Forests score well with respect to early successional and mid-successional stages. However, the amount of late successional and old growth is very low compared to natural range of variability. This is due to a combination of the County Forests being acquired from heavily degraded/deforested as well as a very active timber harvest program- particularly related to other public lands. The following are some examples of efforts taken to maintain later successional stages;</p> <ul style="list-style-type: none"> • While opportunities may be somewhat limited, some examples were observed of existing old-growth forests (Gerstberger Pines in Taylor County) and management to move towards old-growth forests (extended rotation of Skunk Woods in Wood County) as well as the passive management direction on “z” coded stands in Price and other counties. • Older forest inclusions (e.g. hemlock/white pine/yellow birch) on the Price and Taylor County Forests were retained during adjacent management activities. • The effort to recently acquire the Gerstberger Pines tract on the Taylor County Forest and continue with a passive management approach is exemplary • Eau Claire County has a limited number and acreage of “wilderness” areas. <p>In conclusion, there are opportunities for County Forests to implement more extended rotation forests that will address this Indicator. Currently there is marginal conformance.</p>
<p>6.3.a.5. When even-aged management (see Glossary) is employed, live trees and native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type (see Glossary). Exceptions may be allowed when retention at a lower level is necessary for purposes of forest restoration and/or rehabilitation or to maintain community types that exist on the site (e.g., oak-hickory, jack pine). The level of retention increases proportionally to the size of the harvest unit.</p>	NC	<p>Green tree retention guidelines have been added to the Silvicultural Handbook , but they have yet to be implemented. See Major CAR 2009.2.</p>
<p>C6.3.b. Genetic, species, and ecosystem diversity</p>	C	
<p>6.3.b.1. Forest management conserves native plant and animal communities and species.</p>	C	<p>The audit team observed evidence of conformance with most of the elements listed in the example. With implementation of</p>

<p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Declining trees and snags (see Glossary) are left in the forest.</i> • <i>Vertical and horizontal structural complexity is maintained.</i> • <i>Diversity of understory species is maintained.</i> • <i>Well-distributed, large woody debris is maintained.</i> • <i>Habitats and refugia for sedentary species and those with narrow or special habitat requirements are created and/or maintained.</i> • <i>Artificial regeneration uses locally adapted seed and seedlings.</i> 		<p>Major CAR 2009.2, there will be strong conformance with this Indicator.</p>
<p>6.3.b.2. The forest owner or manager cooperates with local, state, and Federal agencies to protect and manage native plant and animal communities and species.</p>	C	<p>County Forests actively cooperate with the State DNR to protect and manage for native plant and animal communities. Through assistance with DNR:</p> <ul style="list-style-type: none"> • Each county’s forest management plan has a section (610) on “Control of Forest Pest & Pathogen” with general information on those found in the county and basics of control including IPM approaches. Section 810.1.5 also covers the basics of Integrated Pest Management. • All foresters interviewed knew the primary pests of the forest types under their management and the silvicultural methods needed to maintain vigorous stands as well as needed treatments when pests appear. • Confirmed timely and effective oak wilt treatments. <p>Rotations in most cases are set short enough to prevent many pest problems (for example Jack Pine rotations of 50 years). Each county’s forest management plan has a section (605) on Fire Control.</p>
<p>6.3.b.3. There is a consistent scientific method for selecting trees to plant, harvest and retain in order to preserve and/or enhance broad genetic and species diversity.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Phenotypic diversity is maintained, in accordance with desired future conditions.</i> 	C	<p>Silvicultural handbook was developed by working groups of experts familiar with local land capabilities. Activities conducted in accordance with the handbook preserve or enhance broad genetic and species diversity. The Silvicultural Handbook describes regeneration options for all stand types; in some cases planting is one option. Where there is an option the sale narrative and prescription describes the planned approach.</p> <p>There are clear requirements to judge adequate regeneration and appropriate actions to correct under-stocked areas and achieve desired species composition and stocking rates for both artificial and natural regeneration.”</p>

		<ul style="list-style-type: none"> • The requirements for adequate regeneration are found in the Silvicultural Handbook. • Foresters are knowledgeable about regeneration treatments and requirements, and conduct informal and formal regeneration surveys for all even-aged regeneration treatments. • Foresters consistently track even-aged regeneration treatments and follow-up to determine success. WisFIRS is used to flag stands that may require follow-up treatments. • Juneau County had two sales 407 and 425 where regeneration in a even-aged stand was challenging, yet the system for tracking regeneration (RECON coding for a regen check at year 5) was not being used. • Most stands managed under selection methods are currently even-aged and are being gradually converted to uneven-aged structure. Most current selection-system harvest entries are not being designed to aggressively seek to establish and release regeneration, and gaps have been smaller and less frequent than recommended in the Silviculture Handbook. Harvests that do include “gaps” to release existing regeneration or to encourage additional regeneration are often easy to assess for regeneration status; but systems to document the regeneration are more informal and less timely (RECON done some years later) than they could be.
<p>6.3.b.4. Forest owners or managers maximize habitat connectivity to the extent possible at the landscape level (e.g., through an ecological classification system, at the subsection or land-type association level).</p> <p><i>For example, habitat connectivity is enhanced by:</i></p> <ul style="list-style-type: none"> • <i>Creating habitat corridors and protecting riparian management zones (RMZs) (see Glossary) between habitats;</i> • <i>Changes in harvest-patch block (see Glossary) sizes, harvest patterns, and land use changes to create connectivity among existing patches of habitat;</i> • <i>Restoration plantings specifically to increase connectivity among existing patches of habitat.</i> 	C	<p>This is a conservation action in the new Wildlife Action Plan that will lead to Conservation Opportunity Areas providing habitat connectivity.</p> <p>RMZ’s are systematically implemented.</p> <p>Natural disturbance regimes in many areas of the State produced disturbances larger than those typically produced through management today. Large-scale forest disturbances are minimized on County lands and there is the potential to develop a patchwork of small-scale disturbances that would counter habitat connectivity.</p>
<p>C6.3.c. Natural cycles that affect the productivity of the forest ecosystem</p>	C	
<p>6.3.c.1. Biological legacies of the forest community are retained at the forest and stand levels, consistent with the objectives of the management plan, including but not limited to: large live and declining</p>	NC	<p>Much improved over recent years, but still inconsistent across the program. Once the revised Chapter 24 Retention guidelines are implemented- there will be conformance. See Major CAR 2009.2.</p>

trees, coarse dead wood, logs, snags, den trees, and soil organic matter.		
<p>6.3.c.2. Forest management practices maintain soil fertility and organic matter, especially in the A horizon, while minimizing soil erosion and compaction. If degradation of soil quality occurs, as indicated by declining fertility or forest health, forest owners or managers modify soil management techniques.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Primary management objectives shift from commercial production to restoration.</i> • <i>Site preparation is minimized.</i> • <i>Road system design and construction is upgraded.</i> • <i>The lightest practical equipment with the lowest ground pressure is used.</i> • <i>Whole-tree harvesting is discontinued, and tops are left in the forest.</i> • <i>Longer rotations and a diversity of species are used in lieu of artificial fertilization.</i> • <i>Processes of natural early succession are allowed or encouraged.</i> 	C	<p>There is good evidence of restricting harvests on moist soils to dry or frozen ground conditions. Isolated non-conformances observed at Jackson County (see Criterion 6.5). BMP's are in place and utilized to reduce soil impacts. Rutting guidelines have been incorporated into all timber sale contracts.</p>
<p>6.3.c.3. Forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools), and forested riparian areas (see also Criterion 6.5).</p>	NC	<p>County Forests do an exceptional job of utilizing BMPs for water quality. Areas that do not fall under these guides, such as vernal pools and pocket wetlands, were found to be less effectively protected. Guidelines for vernal pools and pocket wetlands are being developed, however, in the interim these resources must still be protected.</p> <p>In Chippewa County we observed: Wetland crossing with tops in it; no retention on small wetlands. No systematic protection of vernal pools and pocket wetlands. CAR 2009.3</p>
<p>6.3.c.4. Responses (such as salvage) to catastrophic events (such as wildfire, blowdown, and epidemics) are limited by ecological constraints.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Adequate coarse woody debris is maintained.</i> • <i>Adequate den trees and snags are maintained.</i> • <i>Endemic levels of 'pest' populations are allowed before pest control actions are carried out.</i> 	C	<p>Observed salvage in Juneau County in an HCVF area that was limited to what could be accessed from the road. Implementation of revised retention guidelines will ensure continued conformance.</p>
<p>*C6.4. Representative samples of existing</p>	C	

<p>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>6.4.a. Forest owners and managers protect and reserve ecologically viable representative areas that are appropriate to the scale and intensity of the operation.</p>	C	<p>BER has developed a gap document to identify needs and opportunities for representative samples on County Forests, furthermore, a process has been completed for each County (or ecoregional groupings of County Forests) to meet with BER to complete the assessment of opportunities.</p> <p>The State of Wisconsin has one of the best SNA programs in the US. BER actively conducts analyses of the adequacy of the current network of reserve areas in Wisconsin and County Forests have largely been cooperative where opportunities arise. All County Forests describe contributions to State Natural Areas in chapter 530 of the 15-year Land Use Plans. Other representative areas have been established in a more informal manner by removing them from the harvest schedule through special encoding in Recon/WisFIRS.</p> <p>Because the County Forest system originated from a highly degraded landscape, opportunities for representative samples are limited.</p>
<p>6.4.b. Where existing protected areas within the landscape are not of adequate size and configuration to serve as representative samples of commonly occurring forest types as defined above, owners or managers of mid-sized and large forests, whose properties are conducive to the establishment of such areas, designates ecologically viable areas to serve these purposes.</p>	C	<p>State and Forest Service Lands provide the majority of reserves for commonly occurring forest types, as County Forests have a more intense management mandate. Where unique opportunities have arisen on County Forests- there has been a good record of establishing SNA's.</p>
<p>6.4.c. The size and arrangement and time scale of on-site representative sample areas are designated and justified using assessment methods and sources of up-to-date information described in 6.1.</p> <p><i>Note: Known protected off-ownership areas that are in proximity to the management unit may be used to meet the goal in the landscape.</i></p>	C	<p>State Natural Areas cover full representation of natural communities across the state. Up to date information is utilized where available.</p>
<p>6.4.d. Unless exceptional circumstances can be documented, known areas of intact old-growth forests are designated as representative sample areas under purpose 3. (See Applicability Note under 6.4 above) and are reviewed for designation as High Conservation Value Forests (HCVF- see also</p>	C	<p>County Forests have protected the remaining few areas of intact old growth forests on County Forests; For example:</p> <ul style="list-style-type: none"> • Eau Claire County has designated two older age white pine stands as “wilderness areas” where no harvest will occur. • Older forest inclusions (e.g. hemlock/white

<p>Applicability note under 6.3). Known areas of unentered stands of old-growth are carefully reviewed, screened for uniqueness, and considered as potential representative sample areas prior to undertaking any active management within them (see Applicability Note under 6.4). Old growth stands not designated as either a HCVF or a representative sample area are, at a minimum, managed to maintain their old-growth structure, composition, and ecological functions under purpose 3.</p>		<p>pine/yellow birch) on the Price and Taylor County Forests were retained during adjacent management activities.</p> <ul style="list-style-type: none"> The effort to recently acquire the Gerstberger Pines tract on the Taylor County Forest and continue with a passive management approach is exemplary
<p>6.4.e. The size and extent of representative samples on public lands being considered for certification is determined through a transparent planning process that not only utilizes scientifically credible analyses and expertise but is also accessible and responsive to the public.</p>	C	<p>15-year Land Use plans, which cover representative samples in Chapter 530, undergo a public consultation. The DNR gap assessment is also a public document.</p>
<p>6.4.f. The process and rationale used to determine the size and extent of representative samples are explicitly described in the public summary.</p>	C	<p>Both the County Land Use Plans and the DNR gap assessment are public documents.</p>
<p>6.4.g. Managers of large, contiguous public forests (>50,000 acres) create and maintain representative protected areas within the forest area, sufficient in size to encompass the scale and pattern of expected natural disturbances while maintaining the full range of forest types and successional stages resulting from the natural disturbance regime.</p>	C	<p>There are no contiguous blocks within the County Forests that exceed 50,000 acres. Despite this there is an opportunity to maintain the full range of forest types and successional stages resulting from natural disturbance regimes. Early closed successional stages and types are often favored over mid and late successional types- e.g., many areas that were once dominated by white pine are not being returned to those mid and late-successional type.</p>
<p>C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</p> <p><i>Note: The Lakes States-Central Hardwoods Regional Certification Standards cover a diverse landscape - from prairie to glaciated Northern lands to unglaciated forests in the South. Within this region, all States have developed best management practice guidelines specific to their ecological conditions (see Appendix A). These locally developed guidelines serve as the base requirement for implementation of this standard.</i></p>	C	
<p>6.5.a. A set of forestry best management practices (BMPs), approved by the state forestry agency or</p>	C	<p>BMP's for forestry practices are in the Silvics Manual, and are</p>

<p>otherwise appropriate jurisdiction (e.g., BIA), that address water quality and soil erosion is adhered to (see also 1.1.b). These guidelines may include provisions on riparian management zones (RMZs), skidding, access roads, site preparation, log landings, stream crossings, disturbance of sensitive sites, and wetlands.</p>		<p>utilized on all department properties and incorporated into all timber sale prospectus and/or contracts. BMP's are being developed for vernal pools and small wetlands. Field observation indicated that managers are using and are knowledgeable of the BMPs.</p>
<p>6.5.b. At a minimum, implementation of BMPs and other resource protection measures will result in the following:</p>	C	<p>BMP's are considered mandatory on All County Forests</p>
<p><u>Logging and Site Preparation</u> Logging operations and construction of roads and skid trails are conducted only during periods of weather when soil is least susceptible to compaction, surface erosion, or sediment transport into streams and other bodies of water.</p>	C	<p>The vast majority of sites effectively used seasonable restrictions. Field observations confirmed limited rutting, minimized skid trails, and limited soil disturbance at most sites. No significant damage to residual trees was observed. Two harvests in Jackson County had significant rutting; these harvests were in wet areas where initial sale conditions called for logging during frozen conditions <u>(CAR 2009.4)</u></p>
<p>Logging damage to regeneration and residual trees is minimized during harvest operations.</p>	C	<p>Biomass Harvesting Guidelines (BHG) for appropriate levels of removal/retention have been approved (Dec. 2008) and are being rolled out (spring 2010). These establish limits to removal of wood fiber so as to maintain soil productivity, consistent with existing scientific knowledge. Provisions have been made for research to expand the science and cover gaps in knowledge.</p>
<p>Silvicultural techniques and logging equipment vary with slope, erosion hazard rating, and/or soil instability with the goal of minimizing soil disturbance. Areas that exhibit an extreme risk of landslide are excluded from management activities that may precipitate landslides.</p>	C	<p>In general, harvesting is avoided on steep slopes or areas with high potential for erosion. Several examples of conformance were observed in Eau Claire, Clark, and Jackson County Forests.</p>
<p>Plans for site preparation specify the following mitigations to minimize impacts to the forest resources: 1) Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. 2) Top soil disturbance and scarification of soils is limited to the minimum necessary to achieve successful regeneration of desired species.</p>	C	<p>The new biomass BMP's once adopted will minimize possible future impacts to soil resources. Slash left scattered across most sale areas. Site preparation methods used appear to be the minimum necessary to achieve successful regeneration of target species.</p>
<p><u>Transportation System (including permanent and temporary haul roads, skid trails, and landings)</u></p>	NC	<p>There was generally good conformance across the County Forests visited with roads and skid trails. Roads across County Forests were graveled, crowned, with little adverse</p>

<p>The transportation system is designed, constructed, maintained, and/or reconstructed to minimize the extent of the road network and its potential cumulative adverse effects.</p>		<p>impact. However, we did observe several instances that require a minor CAR to be issued (see CAR 2009.4).</p>
<p>Access to temporary and permanent roads is controlled to minimize significant adverse impacts to soil and biota while allowing legitimate access, as addressed by Principles 3 and 4 and identified in the management plan.</p>	C	<p>We observed that many access roads had permanent locked gates to control access. County Forests appear to find a good balance between allowing access and closing roads to avoid potential damage. However, two problem areas were observed at Clark County</p> <ul style="list-style-type: none"> - Clark County maverick ATV trails having cumulative impacts as trails creep into forest. Restoration is necessary. - Clark County Wildcat Road is a County Forest road where ATV traffic results in excessive berms.
<p>Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.</p>	NC	<p>As a whole numerous measures were noted across properties to reduce impacts of transportation systems. Non-conformance observed at Chippewa County</p> <ul style="list-style-type: none"> - Chippewa Forest County Road- ATV traffic was causing the road to unravel and some sedimentation into adjacent water was observed. (CAR 2009.4)
<p><u>Stream and Water Quality Protection</u> Stream crossings are located and constructed in a way that minimizes fragmentation of aquatic habitat (see Glossary) and protects water quality.</p>	C	<p>New stream crossings were avoided if at all possible. All stream crossings visited during audit were done in accordance with BMP practices.</p>
<p><u>Visual and Aesthetic Considerations</u> Forest owners or managers limit and/or reduce negative impacts on visual quality caused by forest management operations.</p>	C	<p>The team found a number of management activities that were planned to accommodate visual concerns of trail users. Aesthetics are considered in the design and execution of sales.</p> <p>“Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.”</p> <ul style="list-style-type: none"> • Harvests in visible areas, particularly near recreation facilities (campgrounds, trails) were carefully designed to minimize visual impacts. Harvests in those locations have good utilization, visual buffers, and care is taken to minimize impacts on alternative activities. <p>Most contracts include multiple requirements for slash scattering and/or disposal; some of these provisions are for fire-related reasons, but most also help manage aesthetic impacts.</p>
<p>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest</p>	C	

<p>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.</p>		
<p>6.6.a. Forest owners and managers demonstrate compliance with FSC Policy paper: “Chemical Pesticides in Certified Forests, Interpretation of the FSC Principles and Criteria, July 2002” (available at http://www.fsc.org/en/whats_new/documents/Docs_cent/2) and comply with prohibitions and/or restrictions on World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement.</p>	C	<p>There was very limited chemical use in all counties visited during the 2009 audit. No prohibited chemicals are being used. County Forests use several different chemicals in their efforts to reduce the impact or eliminate invasive plants- all uses of the chemicals are full consistent with FSC chemical requirements. Additionally, some limited use was occurring to release planted stands- those applications were also consistent with FSC standards</p>
<p>6.6.b. Forest owners or managers employ silvicultural systems, integrated pest management, and strategies for controlling vegetation that minimize negative environmental effects. Non-chemical techniques are preferred in the implementation of these strategies.</p>	C	<p>Most counties visited during this audit either use no chemicals or use them on only a small portion (or none) of their lands each year. Wood, Eau Claire, and Taylor County Forests currently use none; Chippewa, Juneau, Jackson, Clark, and Price use very little. Chemical use is generally a last resort employed only after other possible methods have been tried or are known to be ineffective.</p> <p>Forest management is strongly focused on maintaining healthy, vigorous stands through stocking control and use of moderately short rotations.</p> <p>Stands are regularly assessed formally (RECON) and informally for presence of insects or diseases, and treatments are applied in a timely manner before outbreaks widen. The initial treatment approach is commonly salvage or sanitation.</p>
<p>6.6.c. Forest owners or managers develop written strategies for the control of pests as a component of the management plan (see Criterion 7.1).</p>	C	<p>Silvicultural Handbook and 15-year Land Use Plans include strategies for the control of pests.</p> <p>IPM is the approach taken in this program, as documented in the Land Use plans: <i>“Integrated pest management for the purpose of this Plan, is defined as follows: The maintenance of destructive agents, including insects, at tolerable levels, by the planned use of a variety of preventive,</i></p>

		<i>suppressive, or regulatory tactics and strategies that are ecologically and economically efficient and socially acceptable.”</i>
6.6.d. If chemicals are applied, the most environmentally safe and efficacious chemicals are used. Chemicals are narrowly targeted, and minimize effects on non-target species.	C	Application is typically ground-based with either tractor or backpack. Use of least toxic and narrowest spectrum pesticides necessary to achieve management objective is at the heart of the silvicultural guidelines and practices. The most toxic and potentially dangerous pesticides are not used, per FSC requirements. Glyphosate is the most common chemical pesticide in use.
6.6.e. Chemicals are used only where they pose no threat to supplies of domestic water, aquatic habitats, or Rare species or plant community types.	C	Chemical records, storage facilities, and field observations indicated this to be the case.
6.6.f. If chemicals are used, a written prescription is prepared that describes the risks and benefits of their use and the precautions that workers will employ.	C	Written prescriptions are being used for all chemical applications- with the exception of spot treatment of invasive exotics in some instances.
6.6.g. If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.	C	Monitoring of success is being done through Recon.
C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C	
6.7.a. In the event of a spill of hazardous material, forest owners or managers immediately contain the material, report the spill as required by applicable regulations, and engage qualified personnel to perform the appropriate removal and remediation.	C	Logging contractors have awareness of spill clean-up procedures. Timber sale contracts include provisions for proper off-site disposal of fluids such as motor oil and hydraulic fluid.
6.7.b. Waste lubricants, anti-freeze, containers, and related trash are stored in a leakproof container until they are transported to an approved off-site disposal site. <i>For example:</i> <ul style="list-style-type: none"> • <i>Management operations incorporate resource recycling and reuse programs when they are available.</i> 	C	Confirmed proper chemical storage at two facilities visited during this audit. Timber sale contracts include provisions for proper off-site disposal of fluids such as motor oil and hydraulic fluid
6.7.c. Broken or leaking equipment and parts are repaired or removed from the forest.	C	Auditors observed one instance of leaking equipment in the field (Chippewa County). Auditors did not get the sense that foresters were looking at this on a regular basis- e.g., no

		discussion of it in timber sale administration notes.
6.7.d. Equipment is parked away from riparian management zones, sinkholes, or supplies of ground water.	C	Equipment viewed during audit was parked in acceptable locations. BMP's are incorporated through sale layout to minimize potential for equipment impact in or near riparian areas.
<p>C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</p> <p><i>Applicability Note: Genetically improved organisms (e.g., Mendelian crossed) are not considered to be genetically modified organisms (see Glossary), and may be used. The prohibition of genetically modified organisms applies to all organisms, including trees. This Criterion is guided by FSC guidelines on GMO's (http://www.fsc.org/en/whats_new/documents/Docs_cent/2).</i></p>	C	
6.8.a. Exotic (i.e., non-indigenous), non-invasive predators or biological control agents are used only as part of a pest management strategy for the control of exotic species of plants, pathogens (see Glossary), insects, or other animals when other pest control methods are, or can reasonably be expected to prove, ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for indigenous species because, for example, exotic species can host pathogens that might diminish biodiversity in the forest.	C	<p>Jackson County is participating in a beetle control for spotted knapweed. Review of beetle underwent Department of Defense process to ensure there was low risk to native spp.</p> <p>County Forests are successfully employing biological control of purple loosestrife with great success.</p>
<p>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p>	C	
6.9.a. Except on plantation sites (see also Criterion 10.4), the use of exotic tree species is permitted only in the first successional stages or other short-term stages for the purposes of restoring degraded ecosystems.	C	All County Forests use native tree species and local genotypes in reforestation efforts.
6.9.b. The use of exotic species (see Glossary) is contingent on peer-reviewed scientific evidence that the species in question is non-invasive and will not diminish biodiversity. If non-invasive exotic	C	No exotic tree species are being planted. Currently native seed mixes for landings, trails, and crossings are not available or are prohibitively expensive.

<p>species are used, the provenance and location of use are documented, and their ecological effects are actively monitored.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Non-invasive exotic plants that are sown to control erosion are used only when suitable native species are not readily available.</i> 		
<p>6.9.c. Written documentation is maintained for the use of exotic species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Species mixes, rates, locations, and times of application are all recorded.</i> 	C	Seed mix information is available.
<p>6.9.d. Forest owners or managers develop and implement control measures for invasive exotic species.</p>	C	<p>DNR has drafted Best Management Practices for Invasive Species. While no coordinated statewide effort to control invasive plants is underway, County Forests are conducting a variety of techniques to reduce species presence.</p> <ul style="list-style-type: none"> • Jackson County uses prison crews • Clark County has a very active monitoring and spray program to contain the spread of existing spp. • WisFIRS has fields for presence/absence of invasives • FISTA training session on Forestry Invasive BMPs (harvesting track) • Wood County is surveying, and has found some buckthorn but not much else. • Wood County admin and liaison are planning to attend the December 3, 2009 training for BHG and Invasive Species. • Jackson, Eau Claire and Juneau have few invasive species and do little, or no pesticide applications. • Biological agents being used for invasive species control in Jackson, Chippewa and Marathon County Forests. • Clark County has a computer system to ID and track invasive plant species occurrences and associated treatments.
<p>C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</p> <p>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p> <p><i>Applicability Note: Forest management activities</i></p>	C	

<p><i>that are part of an approved management plan, including road construction and habitat restoration (such as creation of openings in the forest for wildlife habitat and the maintenance or creation of wetlands or prairies) are not conversions for the purposes of this criterion.</i></p>		
<p>6.10.a. Over the life of the ownership, forest to non-forest conversions are limited to the threshold of 1% of the forest area or 100 acres, whichever is smaller, except that a parcel up to two acres in size may be converted for residential use by the forest owner or manager.</p>	C	<p>Conversions to non-forested areas primarily restricted to prairie restoration and large grassland management areas for specific desired habitat conditions (ie. sharptail grouse).</p>
<p>6.10.b. When private forestlands are sold, a portion of the proceeds of the sale is reinvested in additional forest lands and/or forest stewardship.</p>		<p>There is a clear process in place to either discourage County Forests from selling off lands, or if lands are for sale that there is a full EA review. Withdraw requires cost benefit analysis, environmental assessment, public input, etc. The County Forest Law (s. 28.11(11), Wis. Stats.) requires the Dept. of Natural Resources to approve withdrawal proposals only if the “benefits after withdrawal outweigh the benefits under continued entry” and the lands will be put to a “better and higher use”. Forest stewardship funds are being used to acquire desired parcels for control.</p>
<p>P7 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>C7.1. The management plan and supporting documents shall provide: a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species. h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.</p>	C	

7.1.a. Management objectives		
7.1.a.1. A written management plan is prepared that includes the landowner's short-term and long-term goals and objectives (ecological, social, and economic). The objectives are specific, achievable, and measurable.	C	County planning documents include short-term and long-term goals.
7.1.a.2. The management plan describes desired future conditions that will meet the long-term goals and objectives and that determine the silvicultural system(s) and management activities to be used. <i>For example:</i> <ul style="list-style-type: none"> • <i>The management plan includes a description of forest resources to be managed, environmental limitations, the status of land use and ownership, socioeconomic conditions, and a profile of adjacent lands.</i> • <i>See 7.1.b.1, 7.1.b.2, 7.1.b.3, 7.1.b.4, 7.1.b.5, and 7.1.b.6 for additional examples</i> 	C	Covered in the 15-year plan and Silv. Handbook.
7.1.b. Description of forest resources to be managed, environmental limitations, land use and ownership status, socioeconomic conditions, and profile of adjacent lands	C	
7.1.b.1. The management plan describes the timber, fish and wildlife, harvested non-timber forest products, soils, and non-economic forest resources.	C	Covered in 15-year plan
7.1.b.2. The management plan includes descriptions of special management areas; sensitive, rare, threatened, and endangered species and their habitats; and other ecologically sensitive features in the forest.	C	Covered in 15-year plan
7.1.b.3. The management plan includes a description of past land uses and incorporates this information into the vision, goals, and objectives.	C	Covered in 15-year plan
7.1.b.4. The management plan identifies the legal status of the forest and its resources (e.g., ownership, usufruct rights (see Glossary), treaty rights, easements, deed restrictions, and leasing arrangements).	C	Covered in 15-year plan
7.1.b.5. The management plan identifies relevant cultural and socioeconomic issues (e.g., traditional and customary rights of use, access, recreational uses, and employment), conditions (e.g., composition of the workforce, stability of	C	Covered in 15-year plan

employment, and changes in forest ownership and tenure), and areas of special significance (e.g., ceremonial and archeological sites).		
7.1.b.6. The management plan incorporates landscape-level considerations within the ownership and among adjacent and nearby lands, including major bodies of water, critical habitats, and riparian corridors shared with adjacent ownerships.	C	Covered in 15-year plan, however, some County Forests have limited information. Clark and Eau Claire County Forests have excellent examples of landscape level planning.
7.1.c. Description of silvicultural and/or other management system	C	
7.1.c.1. Silvicultural system(s) and prescriptions are based on the integration of ecological and economic characteristics (e.g., successional processes, soil characteristics, existing species composition and structures, desired future conditions, and market conditions). (see also sub-Criterion 6.3.a)	C	All of these factors are considered when prescriptions are written and implemented.
7.1.c.2. Prescriptions are prepared prior to harvesting, site preparation, pest control, burning, and planting and are available to people who implement the prescriptions.	C	All ground disturbing activities covered under 7.1.c.2 are covered by prescriptions.
7.1.d. Rationale for the rate of annual harvest and species selection	C	
7.1.d.1. Calculations for the harvests of both timber and non-timber products are detailed or referenced in the management plan and are based on net growth, yield, stocking, and regeneration data. (see also 5.6.b)	C	Allowable harvest levels determined by area control. Net growth, yield, stocking, and regeneration data are all incorporated into rotation, harvest entry periods, and silviculture.
7.1.d.2. Species selection meets the social and economic goals and objectives of the forest owner or manager and leads to the desired future conditions while maintaining or improving the ecological composition, structures, and functions of the forest.	C	Species selection described in Chapter 500.
7.1.d.3. The management plan addresses potentially disruptive effects of pests, storms, droughts, and fires as they relate to allowable cut.	C	Chapter 600 of 15-year Land Use plans.
7.1.e. Provisions for monitoring forest growth and dynamics.		
7.1.e.1. The management plan includes a description of procedures to monitor the forest.	C	Section 3300 of 15-year Land Use plans.
7.1.f. Environmental safeguards based on environmental assessments (see also Criterion	C	All of 15-year Land Use plans have an EA

6.1).		
7.1.g. Plans for the identification and protection of rare, threatened, and endangered species. (see also Criterion 6.3)	C	Section 830 of 15-year Land Use plans.
7.1.h. Maps describing the forest resource base including protected areas, planned management activities, and land ownership.	C	
7.1.h.1. The management plan includes maps of such forest characteristics as: relevant landscape-level factors; property boundaries; roads; areas of timber production; forest types by age class; topography; soils; riparian zones; springs and wetlands; archaeological sites; areas of cultural and customary use; locations of sensitive, rare, threatened, and/or endangered species and their habitats; and designated High Conservation Value Forests.	C	Maps are included in of 15-year Land Use plans; All counties already have or will have with WisFIRS a GIS system for mapping.
7.1.i. Description and justification of harvesting techniques and equipment to be used. (see also Criterion 6.5)	C	
7.1.i.1. Harvesting machinery and techniques are discussed in the management or harvest plan and are specifically matched to forest conditions in order to minimize damage.	C	Section 505 of 15-year Land Use Plans
7.1.i.2. Conditions for each timber sale are established by a timber sale contract or written harvest prescription and accompanying timber sale map. <i>For example:</i> <ul style="list-style-type: none"> • <i>Timber sale contracts and harvest prescriptions provide detailed specifications of how trees are to be harvested.</i> 	C	Sale contracts are standardized and include harvest prescriptions and maps. Each sale has a contract that includes prescriptions and detailed specifications of how operations are to be conducted.
C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	C	
7.2.a. Operational components of the management plan are reviewed and revised as necessary or at least every 5 years. Components of the long-term (strategic) management plan are revised and updated at the end of the planning period or when other changes in the management require it. (see also Criterion 8.4) <i>For example:</i> <ul style="list-style-type: none"> • <i>The rationale for changes in the management</i> 	C	Land Use plans undergo comprehensive revision 15-years. However, plans are active documents and amended periodically (often annually) as necessary.

<p><i>plan is stated in subsequent revisions.</i></p> <ul style="list-style-type: none"> • <i>Relevant provisions of the management plan are modified in response to such changes as fire, market conditions, or damage to the road system.</i> 		
<p>C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</p>	C	
<p>7.3.a. The forest owner or manager assures that workers are qualified to implement the management plan (see also Criterion 4.2).</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Loggers and other operators participate in informal and formal training, such as Forest Industry Safety Training Alliance, Game of Logging.</i> • <i>Professional foresters and resource managers meet continuing education standards, such as the Society of American Foresters “Certified Forester” program.</i> • <i>The forest owner or manager utilizes directories that either list or are based on worker qualifications.</i> <p>7.3.b. The management plan is understandable, comprehensive, and readily available to field personnel.</p>	C	<p>Training records are kept for all employees. Numerous opportunities for a wide array of training through DNR, WCFP, and other organizations.</p>
<p>C7.4. 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> <p><i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 8.5)</i></p>	C	
<p>7.4.a. A management plan summary that outlines management objectives (from sub-Criterion 7.1.a.), whether on private lands or the land pool under a resource manager, is available to the public at a reasonable fee. Additional elements of the plan may be excluded, to protect the security of environmentally sensitive and/or proprietary information.</p>	C	<p>All 15-year plans are publically available. All DNR guides, procedures, monitoring reports, and other relevant documents are publically available.</p>

7.4.b. Managers of public forests make forestry-related information easily accessible (e.g., available on websites) for public review, including that required by Criterion 7.1.	C	Management plans are provided on request to the public at no charge. Many of the properties have the plan on a web page and the public can review plans in County offices.
<p>P8 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>C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p>	C	
8.1.a. The frequency of monitoring activities follows the schedule outlined in the management plan.	C	<p>RECON is the core of the monitoring activities on County Forests and the frequency of data collection under Recon follows a schedule not to exceed 20 years. Program-wide, RECON >20 years old has been reduced by over 222,500 acres in last 2 years.</p> <p>FIA inventory is examined for the County Forests every 5 years.</p>
<p>8.1.b. Monitoring is carried out to assess:</p> <ul style="list-style-type: none"> • The degree to which management goals and objectives have been achieved; • Deviations from the management plan; • Unexpected effects of management activities; • Social (see Criterion 4.4) and environmental (see Criterion 6.1) effects of management activities. 	C	<p>There are several examples of County Forest monitoring that addresses this Indicator including: timber sale inspections; BMP monitoring; RECON/WisFIRS which is now being used to look at changes in forest composition; and annual accomplishment plans.</p>
8.1.c. Public and large, private land owners or managers take the lead in identifying, initiating, and supporting research efforts to address pertinent ecological questions. Small and medium private landowners or managers use information that has been developed by researchers and other managers.	C	DNR has a research bureau that addresses a wide range of ecological issues.
<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,</p>	C	

productivity, and efficiency of forest management.		
8.2.a. Yield of all forest products harvested.	C	
<p>8.2.a.1. The forest owner or manager maintains records of standing inventories of timber and harvest volumes of timber and non-timber species (quality and quantity).</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Significant unanticipated removal of forest products (e.g., theft and poaching) is monitored and recorded.</i> 	C	<p>Monitoring efforts include:</p> <p>What: Annual timber sale reports 32A,, 35A, 36A, 37A</p> <ul style="list-style-type: none"> • 32A – Volume harvested by species for each County (based on closed sales) • 35A – Acres established, sold, and closed by County • 36A – Gross volume & value by County (based on closed sales) • 37A – Gross species, volume, value by County (“ “ “) <p>When: Run for State Fiscal year (7/1 – 6/30) and Calendar year</p> <p>Who: DNR County Forest specialist – distributed to counties</p> <p>Use: Accomplishment reporting, acreage control, and removals</p> <p>What: Annual Accomplishment Reporting</p> <ul style="list-style-type: none"> • Electronic – Records harvests established and Recon updated in lieu of a timber sale <p>When: Bi-annually – Fiscal Year basis</p> <p>Who: Reported by field and summarized by DNR County Forest specialist</p> <p>Use: DNR accomplishment reporting and acreage control</p>
8.2.b. Growth rates, regeneration, and condition of the forest		
<p>8.2.b.1. An inventory system is established and records are maintained for:</p> <ol style="list-style-type: none"> 1. Timber growth and mortality (for volume control systems); 2. Stocking, and regeneration; 3. Stand-level and forest-level composition and structure (e.g., by use of tools, such as ecological classification systems); 4. Abundance, regeneration, and habitat conditions of non-timber forest products; 5. Terrestrial and aquatic features; 6. Soil characteristics (e.g., texture, drainage, existing erosion); 7. Pest conditions. 	C	<p>Met though use of FIA data, DNR RECON, Annual Forest Health Report , Plantation and Cultural Report</p> <p>For non-timber forest products, while amounts of harvesting of sphagnum moss are small relative to the overall amount of it- the rates of its growth are extremely slow. County Forests harvesting sphagnum moss should review the overall sustainability of this harvesting activity. (Observation 2009.4)</p>
8.2.c. Composition and observed changes in the flora and fauna	C	
8.2.c.1. Forest owners or managers periodically monitor the forest for changes in major habitat elements and in the occurrence of sensitive, rare,	NC	There are many flora and fauna monitoring activities, as noted below. However, more work is needed on habitat elements of rare, threatened or endangered species/communities (CAR

threatened, or endangered species or communities.

2009.1). CAR 2009.1 is a necessary first step to identify monitoring efforts for SGCN.

Monitoring efforts include:

What: Comprehensive Wildlife Conservation Plan (i.e. Statewide Wildlife Plan)

When: Completed 2005 and scheduled for regular periodic updates

Who: DNR Bureau of Endangered Resources maintains through solicited input

Use: Monitors habitat needs of Wisconsin's species of greatest conservation need.

- Identifies natural community restoration opportunities for landscapes
- Identifies fish, bird, mammal, amphibian, reptile, and invertebrate species needing proactive management by each landscape
- Identifies species distribution probabilities by landscape and natural community
- Identifies threats and conservation actions for species of greatest conservation need
- Available at:

<http://dnr.wi.gov/org/land/er/cwcp/index.htm#Whatis>

What: Multiple surveys and data sources (see attached comprehensive list)

When: Variable, but recurring time frames

Who: DNR or citizen-based surveys

Use: Data summarized periodically and communicated to land managers (e.g. County Forests) for application on the ground. Identifies trends & habitat needs.

What: Natural Heritage Inventory (NHI)

When: Updated continuously

Who: DNR maintains. *Most County Forests are finalizing a data-sharing agreement to directly access the info for their specific County, and to provide updated info on rare and endangered species.

Use: Inventory or sensitive, rare, and endangered species & communities. Information used to avoid or mitigate impacts during forest operations.

What: DNR RECON program (Stand level info on stocking, composition, and structure).

When: Maintained on DNR main frame with input from County Forests. Continuously updated but forest composition comparisons generally done during long range planning (15 yr. intervals) or special requests

Who: Input from field staff

Use: Assess changes in forest age and composition for marketing and analysis of habitat needs and trends.

		<p><u>What:</u> Karner Blue Butterfly Habitat Conservation Plan (HCP)- compliance audits</p> <p><u>When:</u> 1/3 done annually (3 yr. rotation)</p> <p><u>Who:</u> DNR</p> <p><u>Use:</u> Assess compliance with HCP and protection of KBB and its habitat *8 counties are partners in the KBB HCP</p>
<p>8.2.d. Environmental and social impacts of harvesting and other operations</p>		<p>Monitoring efforts include:</p> <p><u>What:</u> Environmental assessment - County Forest Comprehensive Land Use Plan</p> <p><u>When:</u> At long range planning intervals. Most recent 2005 - reoccurring on 15 yr. intervals.</p> <p><u>Who:</u> DNR prepares analysis and coordinates public input on EA</p> <p><u>Use:</u> Assess impacts of County Forest operations</p> <p><u>What:</u> Timber Sale Notice and Cutting Report and Narrative (Form 2460-1)</p> <p><u>When:</u> At timber sale establishment phase (approx. 800 sales annually for program)</p> <p><u>Who:</u> Field Forester - required for each timber sale prior to sale</p> <p><u>Use:</u> Assess impacts of individual timber sale</p> <p><u>What:</u> Best Management Practices (BMP) for Water Quality</p> <p><u>When:</u> Last completed 2003 - Updated periodically</p> <p><u>Who:</u> DNR coordinates</p> <p><u>Use:</u> Assess implementation of BMP's. Indirectly this monitors water quality impacts from forest operations.</p> <p><u>What:</u> Environmental Assessment - County Forest withdrawals</p> <p><u>When:</u> As needed upon filing of withdrawal applications</p> <p><u>Who:</u> DNR</p> <p><u>Use:</u> Assess impacts of land being withdrawn from County Forest designation</p> <p><u>What:</u> Statewide Comprehensive Outdoor Recreation Plan (SCORP)</p> <p><u>When:</u> 2005-2010: Updated on 5 year intervals</p> <p><u>Who:</u> DNR and others</p> <p><u>Use:</u> Assess trends, needs, priorities for outdoor recreation</p>
<p>8.2.d.1. The environmental effects of site-disturbing activities are assessed (e.g., road construction and</p>	<p>C</p>	<p>Monitoring timber sale BMP's as part of close out process.</p>

<p>repair, harvesting, and site preparation).</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Monitoring for compliance with Best Management Practices is carried out.</i> • <i>A monitoring program is in place to assess the condition and environmental impact of the road system and landings.</i> 		
<p>8.2.d.2. Creation or maintenance of local jobs and public responses to management activities are monitored.</p>	C	<p>Job creation was assessed in the EA.</p> <p>Other monitoring efforts include:</p> <p><u>What:</u> County Forest Committee Meetings <u>When:</u> Monthly <u>Who:</u> County Board participants and members of the general public <u>Use:</u> Provides a forum for ongoing assessment of forest operations and social impacts</p>
<p>8.2.d.3. Sites of special significance to American Indians are monitored in consultation with tribal representatives (see also Principle 3).</p>	C	<p>This occurs through use of NHI and the cultural database.</p>
<p>8.2.e. Cost, productivity, and efficiency of forest management</p>	C	
<p>8.2.e.1. Forest owners or managers monitor the cost and revenues of management in order to assess productivity and efficiency.</p>	C	<p>Monitoring efforts include:</p> <p><u>What:</u> Annual Work Plan <u>When:</u> Fall of each year <u>Who:</u> County Forest staff with assistance from DNR <u>Use:</u> Identify work to be completed with the budget requested. Requires County Board approval.</p> <p><u>What:</u> Annual County Forest Report <u>When:</u> Spring / Summer of each year <u>Who:</u> County Forest staff <u>Use:</u> Feedback to County Board and holders of the County Forest plans as to the costs, productivity, and efficiency of the previous year's work on the Forest</p> <p>County Forests and DNR have careful review of budgets.</p>
<p>C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</p>	C	<p>Lock box system with FSC printed on load tickets. FSC numbers must be included on sale prospectus.</p>

<p><i>Applicability Note: For chain-of-custody management requirements, see Section 3.6 of Chain of Custody Standards, FSC Accreditation Manual.</i></p>		
<p>C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.</p>	C	
<p>8.4.a. Discrepancies between the results of management activities or natural events (i.e. yields, growth, ecological changes) and expectations (i.e. plans, forecasts, anticipated impacts) are appraised and taken into account in the subsequent management plan.</p>	C	<p><u>What:</u> Annual Accomplishment Reporting</p> <ul style="list-style-type: none"> • Electronic – Records harvests established and Recon updated in lieu of a timber sale <p><u>When:</u> Bi-annually – Fiscal Year basis <u>Who:</u> Reported by field and summarized by DNR County Forest specialist <u>Use:</u> DNR accomplishment reporting and acreage control</p> <p>Chippewa County is not current in the annual accomplishment reporting (CAR 2009.7)</p>
<p>C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</p> <p><i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 7.4)</i></p>	C	
<p>8.5.a. A summary outlining the results of monitoring is available to the public at a reasonable fee, whether on private lands or a land pool under a resource manager or group certification.</p>	C	<p>A list of monitoring activities has been summarized and provided to the certification team. The public can obtain some monitoring results from annual reports from County websites. However, a complete summary of results has not been produced or made easily accessible. Additionally, DNR maintains a website with a collection of result from different monitoring activities.</p>
<p>8.5.b. Managers of public forests make information related to monitoring easily accessible (e.g., available on websites) for public review.</p>	NC	<p>County Forests and or DNR must make available a public summary of monitoring results that covers the topics listed in Criterion 8.2 readily available (CAR 2009.5)</p>
<p>P9 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.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ol style="list-style-type: none"> 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 		

<p>c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)</p> <p>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).</p>		
<p>C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>C</p>	
<p>9.1.a. Attributes and locations of High Conservation Value Forests are determined by:</p> <ol style="list-style-type: none"> (1) Globally rare, threatened, or endangered features, habitats, or ecosystems that may be present in the forest (suggested sources of information are: The Nature Conservancy, World Wildlife Fund, Conservation International, World Resources Institute); (2) Regionally and locally rare, threatened, or endangered features, habitats, or ecosystems that may be present in the forest; culturally and tribally significant areas; or municipal watersheds that may be present in the landscape and/or certified forest (suggested sources of information include natural and cultural heritage agencies); (3) Appropriate consultations with local and regional scientists and other stakeholders; (4) Public review of proposed HCVF attributes and areas on large-scale and public ownerships (see also 7.4, 4.4.e., 4.4.f.); (5) Integration of information from consultations and public review into proposed HCVF delineation; (6) Delineation by maps and habitat descriptions. 	<p>C</p>	<p>The Natural Areas Program conducted a coarse level survey of the County Forest system for HCVF. County Forests have also identified their own special sites that they have become familiar with through the long history of surveying (RECON).</p> <ul style="list-style-type: none"> ▪ Many County Forests have identified and are conserving forest types/areas that qualify as HCVF, e.g., Karner Blue, barrens communities, State Natural Areas, scenic river ways, ice age trail, bluffs, hemlock, white pine communities, etc. ▪ County Forest system as a whole, was built from a highly denuded landscape, and as a result contains low amounts of pristine/unique forests ▪ <i>De facto</i> HCVF has been identified and protected in many County Forests- through forester’s knowledge of unique types and stands and a management approach that maintains those unique qualities. ▪ NHI database is checked during planning for all timber sales and significant projects. <p>Examples of HCVF observed on this audit include:</p> <ul style="list-style-type: none"> • Price County has designated the 220 acre Jump River Woods as a State Natural Area and two other sites as High Conservation Value Forest. • Wood County has established several State Natural Areas: including Red Oak Bottoms *, Owl Creek Fen Savanna (900 acres), Hiles Wetlands, and Skunk Creek Woods Proposed State Natural Area *. * sites are productive forestland being managed on longer rotation to test “ecological forestry” approach. The plan lists other special sites including bluff sites, red-shouldered hawk management location... • Taylor County Plan: “530.1.1 Relic Old Growth Stands: The Gerstberger Pines Area is a 20 acre parcel in the Township of Rib Lake. This area is considered to be a relic old growth stand and was acquired for its unique features. It has been set aside

		<p>as a special use area. An educational trail and associated parking lot has been developed to explain unique aspects of the area... It is the policy of Taylor County to manage these resources (locally significant sites) to enhance and protect their individual exceptional features. The State Historical Society maintains a database of identified areas. This database will be consulted as a part of timber sale establishment.”</p>
<p>C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p> <p><i>Note: FSC understands that Criterion 9.2 is an instruction to Certification Bodies and that no indicators are required.</i></p>	C	<ul style="list-style-type: none"> ▪ Experts outside of the County Forest program, primarily BER, are used extensively ▪ Forestry committee meetings and the 15-year planning process are used to gain public input on all of County Forest management
<p>C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p> <p><i>Applicability Note: The applicability of the precautionary principle (see Glossary) and the consequent flexibility of forest management vary with the size, configuration, and tenure of the HCVF:</i></p> <p>a) <i>More flexibility is appropriate where an HCV forest is less intact, larger in area, has a larger area-to-perimeter ratio, and its tenure is assured over the long term.</i></p> <p>b) <i>Less flexibility is appropriate where an HCV forest is more intact, covers a smaller area, has a smaller area-to-perimeter ratio, and future tenure is uncertain, based on social considerations.</i></p>	C	
<p>9.3.a. Forest management plans and activities are appropriate for maintaining, enhancing and/or restoring attributes that make the area an HCVF.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Passive management activities are carried out when they maintain, enhance, or restore HCVF characteristics and/or enlarge the size of the HCVF.</i> 	C	<p>HCVF- that is to be maintained with passive management, is not consistently being removed from the harvest schedule (i.e. zzzz out of Recon). Thus, operational protection is dependent upon institutional memory. Some counties have considerable turnover- thus making this a tenuous situation.\</p>

<ul style="list-style-type: none"> • <i>When prescribed burns, removal of invasive species, and integrated pest management activities are carried out, they occur in a manner consistent with maintenance, protection and/or restoration of HCVF characteristics.</i> • <i>When timber harvesting is carried out, it occurs in a manner that is consistent with HCVF maintenance, enhancement, or restoration.</i> 		
<p>9.3.b. Active management in HCVFs is allowed only when it maintains or enhances high conservation values.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Maintenance of old-growth and HCVF attributes may be carried out by: (1) removal of exotic species and (2) use of controlled burning.</i> 	C	<p>Areas qualifying as HCVF that have been identified have been reasonably well protected to-date. Maintaining barrens is the only active management that has occurred in HCVF- and it has been done with good success. Related CAR 2009.6.</p>
<p>9.3.c. The management-plan summary includes information about HCVF management without compromising either the confidentiality of the forest owner or manager or environmentally and culturally sensitive features (see also sub-Criterion 7.1.f).</p>	C	<p>Information about HCVF is included in the public summary of the management plan.</p>
<p>9.3.d. Forest owners or managers of HCVFs (forests and/or stands) coordinate conservation efforts with forest owners or managers of other HCVFs in the landscape.</p>	C	<p>The DNR works closely with other landowners toward the conservation of HCVF's across the state. Being the source of many of the official assessments, the DNR is often contacted by outside agencies for their data and expertise. This is also accomplished through the Conservation Opportunity Area (COA) concept.</p>
<p>C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	C	
<p>9.4.a. Forest owners or managers of small forests may satisfy this requirement with informal observations (see 8.1 and 8.2.). When observations detect changes, the changes are documented.</p>	NA	
<p>9.4.b. Forest owners or managers of mid-sized and large forests monitor activities within and adjacent to HCVFs that may affect HCVF attributes (see Criteria 7.2, 8.1 and 8.2). Monitoring is adequate to track changes in HCV attributes, and may include informal observations. When monitoring detects changes to HCV attributes, the changes are documented.</p>	C	<p>Relevé plots are being setup on County forest HCVF. Recon also covers HCVF.</p>
<p>P10 Plantations shall be planned and managed in accordance with Principles and Criteria 1 9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</p>		

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

.11 Controversial Issues

FSC requires the certification body to identify and briefly discuss, in a certification report, any controversial issues associated with the forest management unit for which certification is being sought. In the judgment of the SCS audit team, there are no highly controversial or contentious issues associated with forest management of WCFP.

2.0 TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS

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

During the first 5-year certification of the Wisconsin State Forests the WCFP supplied to the SCS evaluation team a description of its log handling and tracking procedures. These procedures were found to be fully adequate for assuring tracking of wood sourced from the County Forests.

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

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

2.2 Description of the Log Control System

Chain-of-custody certification is required throughout the supply chain if downstream purchasers and processors wish to carry forward the certified status of wood products sourced from the County Forests. With respect to the County Forests, the chain-of-custody focus is quite narrow, as County Forests exclusively sells standing timber. County Forests do not have control of the flow of wood products from the County Forests once the trees have been severed from the stump, by the successful bidder.

Chain-of-custody obligations will include:

- Effectively notifying all purchasers of County Forests timber sales that maintaining the FSC-certified status of the procured products requires each and every holder/owner of the product, from severance at the stump onward, to hold valid FSC-endorsed chain-of-custody certificates
- Providing SCS and/or the FSC with detailed information regarding all sales of County Forests owned timber: purchaser's name and contact information, species and volume sold, date of sale
- Maintaining records for at least 5 years

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

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

2.3 End Point of Chain of Custody

For County Forests, the end point of chain of custody is severance at the stump, at which point it is transferred to the buyer of the timber sale if he or she wished to maintain the FSC chain-of-custody.

2.4 Visual Identification at End Point of Chain of Custody

All logs purchased from and hauled off of the County Forests are branded and/or marked and accompanied by trip tickets and bills of lading that includes FSC registration code. The audit team is satisfied that County Forests procedures assure that all timber harvested and removed from the County Forests are accurately accounted for.

3.0 GROUP MANAGEMENT

3.1 Division of Responsibilities

Division of responsibilities is described in the Public Lands Handbook. WI DNR, the group entity, is clearly a competent forest management agency. The group entity is further strengthened by the Wisconsin County Forests Association, which provides a very effective mechanism for the consideration of problems and policies of concern to the Counties. The DNR Liaison Foresters (at least 1 forester assigned per county) and the institutional capacity of DNR, with its professional staff (hydrologists, pathologists, biologists, etc) and resources (GIS, Recon, nurseries) who and which are available to assist the County Forest program, together serve as the core to successful function of the group scheme.

DNR provides funds 50% of the Forest Administrator's salary at each County, thus further strengthening the competency of the program. The specifics of this program are addressed in s. 28.11(5), Wis. Stats., and ss. NR 47.50 through NR 47.58, Wis. Adm. Code.

3.2 Conformance with Group Management Criteria

See section B 3.6, below

3.3 Group Sampling and surveillance.

See Section A.3.3, above

3.4 Group Size and Scope

The group scope is Counties enrolled in the WCFP. There is no limit on size.

3.5 Group Members

County	FSC acres	Certificate Code
Ashland	40,008	SCS-FM/COC-0083G-a
Barron	15,944	SCS-FM/COC-0083G-b
Bayfield	169,444	SCS-FM/COC-0083G-r
Chippewa	33,107	SCS-FM/COC-0083G-c
Clark	132,8461	SCS-FM/COC-0083G-d
Douglas	272,823	SCS-FM/COC-0083G-s
Eau Claire	52,350	SCS-FM/COC-0083G-e
Florence	36,709	SCS-FM/COC-0083G-f
Forest	10,888	SCS-FM/COC-0083G-g
Iron	174,267	SCS-FM/COC-0083G-h
Jackson	121,028	SCS-FM/COC-0083G-i
Juneau	15,380	SCS-FM/COC-0083G-j
Lincoln	100,845	SCS-FM/COC-0083G-q

Oconto	43,581	SCS-FM/COC-0083G-k
Price	92,236	SCS-FM/COC-0083G-l
Sawyer	115,201	SCS-FM/COC-0083G-m
Taylor	17,653	SCS-FM/COC-0083G-n
Washburn	149,003	SCS-FM/COC-0083G-o
Wood	37,593	SCS-FM/COC-0083G-p
Total County Forest Certified Acres	1,630,906	

3.6 Group Management Evaluation

Requirement	C/N	Comment/CAR
Group Management		
C1 Authority of the group entity.		
1.a. In order to be eligible to apply for group certification, the group applicant must be an independent legal entity or an individual acting as a legal entity.	C	Group entity, Wisconsin DNR is an independent entity
1.b. The group entity's responsibilities, for example with respect to management planning, monitoring, harvesting, quality control, marketing, processing, etc., shall be clearly defined and documented.	C	<p>The DNR's Division of Forestry - County Forest Specialist is designated as the group manager who administers the affairs of the Wisconsin County Forest Certification Group.</p> <p>The group manager works with regional and field staff in that role and may delegate responsibilities through normal supervisory channels. The group manager:</p> <ul style="list-style-type: none"> • Maintains the records of the group organization. • Applies for group certification and selects accredited certification firm(s) to conduct audits. • Coordinates group member participation on issues and activities pertaining to certification. • Serves as a conduit for information on FSC and SFI certification to group members. • Processes applications for membership to both the FSC and SFI groups. • Coordinates ongoing monitoring of conformance of the group members with FSC

		<p>and SFI standards.</p> <ul style="list-style-type: none"> • Represents the group organization throughout the audit process, including attending all field audits. • Ensures that public or group member claims about the certification are accurate, truthful, and consistent with truth in advertising guidelines. (Use of FSC and SFI logos should be in accordance with FSC and SFI logo use guidelines.) • Is responsible for timely reporting and payment of fees to FSC, SFI, and firms conducting audits. • Works with group member counties in identifying and providing appropriate training. • Communicates audit findings to group members. • Works with group member counties and group organization staff to coordinate corrective action plans in response to audit findings. • Functions as the primary contact for FSC and SFI auditors.
1.c. The group entity shall be contractually responsible to the certification body for ensuring that the <i>FSC P&C</i> are fully implemented by all members of the group.	N C	WI DNR is contractually responsible for managing the group. Several non-conformances were observed at Chippewa County, which had never been audited before. This finding indicated that more monitoring/control over group members is necessary (CAR 2009.7)
1.d The group entity shall be responsible for ensuring that any conditions on which certification is dependent, and any corrective actions issued by the certification body thereafter, are fully implemented.	N C	WI DNR maintains this responsibility. Several non-conformances were observed at Chippewa County, which had never been audited before.
1.e. The group entity shall have the authority to remove members from the scope of the group certificate if the requirements of group membership, or any corrective actions issued by the certification body, are not complied with.	C	WI DNR has this authority, as detailed in the Public Lands Handbook.
1.f The group entity shall have sufficient legal and management authority and technical support to implement the responsibilities specified in 1.b-1.e, above.	C	WI DNR has sufficient legal and management authority to implement responsibilities in 1.b.-1.e, as detailed in the Public Lands Handbook.
C2 Group membership requirements and responsibilities.		

2.a The group entity must have clear rules regarding eligibility for membership of the group certificate.	C	Eligibility requirements are detailed in the Public Lands Handbook.
2.b The group members' management responsibilities, for example with respect to management planning, monitoring, harvesting, quality control, marketing, processing, etc. shall be clearly defined and documented.	C	Described in the Public Lands Handbook.
2.c If new members can join the certified group after a certificate has been awarded, the group entity shall have clear, documented procedures for this. It is recommended that new group members must complete a probationary period or initial inspection before any products from their forest area are eligible to enter into a certified chain of custody, and hence to carry the FSC Logo.	C	Described in the Public Lands Handbook.
C3 Informed consent of group members.		
3.a The group entity must provide each group member with documentation, or access to documentation, specifying the relevant terms and conditions of group membership. The documentation shall include:	C	Documentation is provided through the Public Lands Handbook and other related documents.
i) Access to a copy of the Forest Stewardship Standard to which the group is committed;	C	
ii) Explanation of certification process;	C	
iii) Explanation of certification body's, and FSC's, rights to access to the group members' forests for the purposes of evaluation and monitoring;	C	
iv) Explanation of certification body's, and FSC's requirements with respect to public information;	C	
v) Explanation of any obligations with respect to group membership, such as: a) maintenance of information for monitoring purposes; b) use of systems for tracking and tracing of forest products; c) requirement to conform with conditions or corrective actions issued by the certification body; d) any special requirements related to marketing or sales of products covered by the certificate; e) other obligations of group membership; and	C	

vi) Explanation of any costs associated with group membership	C	
3.b A 'consent form' or its equivalent must be signed by each group member or the member's representative who voluntarily wishes to join the certification scheme. The consent form: i) acknowledges and agrees to the obligations and responsibilities of group membership; ii) agrees to membership of the scheme for the full period of validity of the group certificate; and iii) authorizes the group entity to apply for certification on the member's behalf.	C	Consent demonstrated through County Board resolutions.
C4 Group Records	C	WI DNR maintains adequate records of group members
4.a The group entity shall be responsible for maintaining the following records up to date at all times:	C	
i) List of names and addresses of group members, together with date of entry into group certification scheme;	C	
ii) Maps of all forest areas included in the group certification;	C	
iii) Records demonstrating landownership of group members;	C	
iv) Evidence of consent of all group members, preferably in the form of a signed 'consent form' (see 3.b)	C	
v) Relevant documentation and records regarding forest management of each group member (e.g. management plans, summary information regarding silvicultural system, management operations, volume production);	C	
vi) Records demonstrating the implementation of any internal control or monitoring systems (see 1.b - 1.e above). Such records shall include records of internal inspections, non-compliance identified in such inspections, actions taken to correct any such non-compliance;	C	
vii) Relevant documentation regarding production and sales; and	C	
viii) The date of leaving of any group members, and an explanation of the reason why the member left the group.	C	
4.b The same documentation shall be archived for at least 5 years.	C	

C5 Certification Costs	C	
5.a The group entity shall be fully responsible to the certification body for paying all the costs of evaluation and monitoring throughout the period of validity of the certificate. The group entity may divide these costs amongst group members as it deems appropriate	C	WI DNR is the responsible party
5.b The group entity may not issue sub-licenses for use of the FSC Logo or other FSC Trademarks.	C	No sub-licenses are issued.
C6 Group Turnover		
6.1 If a group member joins or leaves either the group or the group certification scheme, the group entity shall inform the certification body within one month.	C	No group members have left the groups. With the 3 new group members that have enrolled, WI DNR has been timely in their notification.

