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

Wisconsin Department of Natural Resources – County Forest Program

SCS-FM/COC-00083G

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CERTIFIED	EXPIRATION
Day Month 2014	Day Month 2019

DATE OF FIELD AUDIT
12-15/August/2014
DATE OF LAST UPDATE
28/Oct/2014

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Setting the standard for sustainability™

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Foreword

SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as "well managed," thereby permitting the FME's use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (http://info.fsc.org/) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Certificate Registration Information

1.1.1.a Name and Contact Information

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

1.1.1.b FSC Sales Information

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

1.1.2 Scope of Certificate

Certificate Type	☐ Single FMU	☒ Multiple FMU
	☐ Group	
SLIMF (*if applicable)*	☐ Small SLIMF certificate	☐ Low intensity SLIMF certificate
	☐ Group SLIMF certificate	
# Group Members (*if applicable)*		
Number of FMUs in scope of certificate	19	
Geographic location of non-SLIMF FMU(s)	*Latitude & Longitude:* See table on page 9.	
Forest zone	☐ Boreal	☒ Temperate
	☐ Subtropical	☐ Tropical
Total forest area in scope of certificate which is:	**Units:** ☐ **ha or** ☒ **ac**	
privately managed		
state managed		
community managed	1,645,027 acres (Rpt.50A - FSC only)	

Number of FMUs in scope that are:			
less than 100 ha in area		100 - 1000 ha in area	
1000 - 10 000 ha in area	4	more than 10 000 ha in area	15
Total forest area in scope of certificate which is included in FMUs that: **Units: ☐ ha or ☐ ac**			
are less than 100 ha in area			
are between 100 ha and 1000 ha in area			
meet the eligibility criteria as *low intensity* SLIMF FMUs			
Division of FMUs into manageable units:			
FMU are individual County Forests which are further subdivided into compartments and stands.			

1.2 FSC Data Request

1.2.1 Production Forests

Timber Forest Products	**Units: ☐ ha or ☒ ac**
Total area of production forest (i.e. forest from which timber may be harvested)	1,326,366 forested area scheduled for management (Rpt.101)
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	127,120(PR, SW and 2/3 PJ) (Rpt.102)
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	1,199,246
Silvicultural system(s)	**Area under type of management**
Even-aged management	
Clearcut (clearcut size range (1-264 (15.45 avg) ac (WisFIRS export))	613,380 - A, 1/3 PJ, OX (Rpt.102)
Shelterwood	163,810 PW and O
Other: (e.g., coppice, seed-tree)	128,079
Uneven-aged management	
Individual tree selection	225,964 NH
Group selection	68,013 BH, SH, CH
Other:	
☐ Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Acres: (Rpt. 201) 11,898 ASPEN 154 BOTTOMLAND HARDWOODS 309 WHITE BIRCH 480 WHITE CEDAR 5 CENTRAL HARDWOODS 195 BALSAM FIR 309 FIR SPRUCE-*OLD

	CODE, RECODE 84 HEMLOCK 10 MISCELLANEOUS CONIFEROUS 12 MISCELLANEOUS DECIDUOUS 828 RED MAPLE 11,781 NORTHERN HARDWOODS 4,876 OAK 598 SCRUB OAK 1,049 JACK PINE 4,062 RED PINE 1,569 WHITE PINE 822 BLACK SPRUCE 246 SWAMP CONIFER 2,403 SWAMP HARDWOODS 144 WHITE SPRUCE 549 TAMARACK **42,383 Total acres**
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	Sphagnum moss- 20,000 bales annually (0391B sub-product); N6.3.1 Christmas trees 15 trees and 40 tons of boughs (WisFIRS export product 42T)
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
Data is derived from "WisFIRS" which is database that contains all recon, treatment, and timber sale data for State and County Lands. Sustainable rate of harvest is based on long term harvest goals (15yr avg.)	
Species in scope of joint FM/COC certificate: *Scientific/ Latin Name* (Common/ Trade Name)	

Species	**Scientific Name**
Aspen/Popple:	*Populus tremuloides*
	Populus grandidentata
Balsam poplar	*Populus balsamifera*
Bottomland hardwoods:	
Eastern Cottonwood	*Populus deltoides*
Swamp white oak	*Quercus bicolor*

Miscellaneous conifers:	
Scotch pine	*Pinus sylvestris*
European larch	*Larix decidua*
Norway spruce	*Picea abies*
Eastern redcedar	*Juniperus virginiana*
Blue spruce	*Picea pungens*
Miscellaneous deciduous:	

Siver maple	*Acer saccharinum*	Norway maple	*Acer platanoides*
American elm	*Ulmus americana*	Boxelder	*Acer negundo*
River birch	*Betula nigra*	Black locust	*Robinia pseudoacacia*
Green ash	*Fraxinus pennsylvanica*	Honey locust	*Gleditsia triacanthos*
		Eastern Hophornbeam, Ironwood	*Ostrya virginiana*
		Musclewood, Bluebeech	*Carpinus caroliniana*
		Northern hardwoods:	
Central hardwoods:		Sugar maple	*Acer saccharum*
White oak	*Quercus alba*	Yellow birch	*Betula alleghaniensis*
Bur oak	*Quercus macrocarpa*	White ash	*Fraxinus americana*
Black oak	*Quercus velutina*	American beech	*Fagus grandifolia*
Northern pin oak	*Quercus ellipsoidalis*	American basswood	*Tilia americana*
Black walnut	*Juglans nigra*	White birch	*Betula papyrifera*
Butternut	*Juglans cinerea*	Northern red oak	*Quercus rubra*
Shagbark hickory	*Carya ovata*	Red Pine	*Pinus resinosa*
Bitternut hickory	*Carya cordiformis*	Jack Pine	*Pinus banksiana*
Black cherry	*Prunus serotina*	Eastern white pine	*Pinus strobus*
Red maple	*Acer rubrum*	Black spruce	*Picea mariana*
Hackberry	*Celtis occidentalis*	Tamarack	*Larix laricina*
		Black ash	*Fraxinus nigra*
Balsam fir	*Abies balsamea*	White spruce	*Picea glauca*
Eastern hemlock	*Tsuga canadensis*	Northern white cedar	*Thuja occidentalis*

1.2.2 FSC Product Classification

Timber products			
	Product Level 1	**Product Level 2**	**Species**
[X]	**W1 Rough Wood**	W1.1 Roundwood (logs)	12,326 MBF and 470,034 cds. (Rpt. 37A) –All species listed above.
[X]		W1.2 Fuel Wood	1,704 cds –All species listed above.
[ ]		W1.3 Twigs	
[ ]	**W2 Wood charcoal**		
[X]	**W3 Wood in chips or particles**	W3.1 Wood chips	<4” diameter (prod code 26) and mixed diameter (prod code 24)- Rpt. 37A (total cords-sum of cords by species) 139,639 cd eq. –All species listed above.
[ ]	**Other***	Please List:	
Note: If your operation produces processed wood products such as wood pellets, planks, beams, poles etc. please discuss with SCS staff as you may need a separate CoC certificate.			

Non-Timber Forest Products			
	Product Level 1	**Product Level 2**	**Product Level 3 and Species**
☐	**N1 Bark**		
☐	**N4 Straw, wicker, rattan and similar**	N4.1 Rattan cane (rough form)	
☐		N4.2 Rattan taper (clean, peeled and spitted)	
☐		N4.3 Decorative objects and wickerwork	
☐		N4.4 Rattan furniture	
☐		N4.5 Rattan furniture components	
☒	**N6 Plants and parts of plants**	N6.1 Flowers	
☒		N6.2 Grasses, ferns, mosses and lichens	Sphagnum moss (*Sphagnum* spp.)
☒		N6.3 Whole trees or plants	☒ N6.3.1 Christmas trees 15 trees and 40 tons of boughs (WisFIRS export product 42T)
☐		N6.4 Pine cones	
☐	**N7 Natural gums, resins, oils and derivatives**	N7.1 Rubber/latex	
☐		N7.2 Gum resin	
☐		N7.3 Resin and manufactured resin products	
☐		N7.4 Tannin	
☐		N7.5 Essential oils	
☐	**N9 Food**	N9.1 Nuts	
☐		N9.2 Tea	
☐		N9.3 Palm-hearts	
☐		N9.4 Mushrooms, truffles	
☐		N9.5 Fruits	
☐		N9.6 sap-based foods	
☐		N9.7 Game	
☐		N9.8 Honey	

1.2.3 Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	30,353Acres (WisFIRS report; prefix F, J, K, N, or S and Z)
High Conservation Value Forest/ Areas	

High Conservation Values present and respective areas:			Units: ☐ ha or ☒ ac	
	Code	**HCV Type**	**Description & Location**	**Area**
☒	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Barrens-Eau Claire, Clark, Jackson Old Growth pine relics-Juneau, Talyor, Forest Oak Savanna- Clark, Washburn	2233
☒	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally-occurring species exist in natural patterns of distribution and abundance.	St. Croix River scenic easements (Natural Scenic River) Penokee Range-Iron Silent Wood Benchmark For.-Washburn	2713
☒	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Assorted bogs, Wetland communities, hemlock areas, fens, kettle lakes- Several counties	37,494
☒	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Migratory Bird Area-Clark Nemadji Floodplain forest-Douglas Potato River Falls-Iron	619
☐	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		0
☐	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total Area of forest classified as 'High Conservation Value Forest/ Area'				43,059

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

☐ N/A – All forestland owned or managed by the applicant is included in the scope.	
☒ Applicant owns and/or manages other FMUs not under evaluation.	
☐ Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.	
Explanation for exclusion of FMUs and/or excision:	29 County Forests exist in WI. 19 of them have chosen to commit to FSC certification. The other 10 are either SFI certified or not certified under any forest certification program. Within each county, there may be forestlands that are outside of the scope for other reasons, such as being inaccessible to forest management for timber production.
Control measures to prevent mixing of certified and non-	Each FMU has its own log or haul tickets that include the appropriate certificate codes as applicable. Non-certified FMUs are

certified product (C8.3):	not permitted to use any certificate codes. Forest areas outside of the scope within certified counties typically are not managed through timber harvests.

Description of FMUs excluded from or forested area excised from the scope of certification:

Name of FMU or Stand	Location (city, state, country)	Size (☐ ha or ☒ ac)
Refer to table 1.1.2 of this section and the summary table below.	Scattered across WI.	~710,000 acres.

WI County Forest FMU Summary

County Name	Certification Status	FSC County Sub-code	General Location Latitude	General Location Longitude	Forest Administrator	Email Address	Co. Forest Lands	Special Use Lands	Total Acres
Ashland	FSC/SFI	a	46° 12' 45" N	-90° 28' 56" W	Chris Hoffman	choffman05@centurytel.net	40,083.33	0	40,083.33
Barron	FSC/SFI	b	45° 37' 16" N	-91° 52' 6" W	'John Cisek'	john.cisek@co.barron.wi.us	16,264.69	0	16,264.69
Bayfield	FSC/SFI	r	46° 47' 12" N	-90° 58' 52" W	Jason Bodine'	jbodine@bayfieldcounty.org	169,284.01	110.7	169,394.71
Burnett	SFI		45° 52' 29" N	-92° 10' 38" W	Jason Nichols	jnichols@burnettcounty.org	105,425.18	0	105,425.18
Chippewa	FSC	c	45° 11' 50" N	-91° 14' 53" W	Dahlby, Mike	mdahlby@co.chippewa.wi.us	32,968.88	1,614.56	34,583.44
Clark	FSC	d	44° 35' 54" N	-90° 47' 46" W	Rick Dailey	rick.dailey@co.clark.wi.us	134,193.81	63.5	134,257.31
Douglas	FSC/SFI	S	46° 17' 39" N	-92° 0' 7" W	'Jon Harris'	jharris@douglascountywi.org	263,264.52	15,499.14	278,763.66
Eau Claire	FSC/SFI	e	44° 45' 9" N	-91° 2' 7" W	Joshua Pedersen	Josh.Pedersen@co.eau-claire.wi.us	51,579.82	793.1	52,372.92
Florence	FSC/SFI	f	45° 46' 53" N	-88° 15' 4" W	'Patrick Smith'	psmith@co.florence.wi.us	36,331.65	63.15	36,394.80
Forest	FSC/SFI	g	45° 31' 52" N	-88° 52' 26" W	'David Ziolkowski'	dzforestco@ez-net.com	12,518.48	0	12,518.48
Iron	FSC/SFI	h	46° 17' 45" N	-90° 13' 48" W	'Joe Vairus'	icfadmin@ironcountyforest.org	173,111.30	1,048.02	174,159.32
Jackson	FSC/SFI	i	44° 20' 57" N	-90° 32' 6" W	'Jim Zahasky'	jim.zahasky@centurytel.net	119,405.91	2,685.40	122,091.31
Juneau	FSC/SFI	j	44° 1' 2" N	-90° 8' 14" W	Brian Loyd	pfadm@co.juneau.wi.us	15,936.87	1,867.72	17,804.59
Langlade	SFI		45° 20' 1" N	-89° 4' 14" W	Erik Rantala	erantala@co.langlade.wi.us	128,082.81	1,885.24	129,968.05
Lincoln	FSC/SFI	q	45° 22' 57" N	-89° 50' 45" W	'Kevin Kleinschmidt'	kkleinschmidt@co.lincoln.wi.us	100,421.30	421.75	100,843.05
Marathon	SFI		44° 52' 11" N	-89° 41' 33" W	Tom Lovlien	tglovlien@mail.co.marathon.wi.us	29,384.47	552.1	29,936.57
Marinette	SFI		45° 27' 39" N	-88° 10' 59" W	Pete Villas	pvillas@marinettecounty.com	227,116.75	3,528.91	230,645.66
Monroe	Not Certified		44° 6' 50" N	-90° 44' 54" W	Chad Ziegler	cziegler@co.monroe.wi.us	6,841.17	432.3	7,273.47
Oconto	FSC/SFI	k	45° 2' 24" N	-88° 16' 40" W	Robert Skalitzky	robert.skalitzky@co.oconto.wi.us	43,547.37	159.43	43,706.80

Oneida	SFI		45° 35' 24" N	-89° 37' 1" W	John Bilogan	jbilogan@co.oneida.wi.us	82,099.81	179.2	82,279.01
Polk	SFI		45° 36' 21" N	-92° 43' 11" W	Jeremy Koslowski	jeremy.koslowski@co.polk.wi.us	16,445.71	698.04	17,143.75
Price	FSC/SFI	l	45° 34' 9" N	-90° 23' 54" W	'Eric Holm'	eric.holm@co.price.wi.us	91,472.81	795.01	92,267.82
Rusk	SFI		45° 35' 15" N	-91° 4' 19" W	Paul Teska	pteska@ruskcountywi.us	88,765.62	240	89,005.62
Sawyer	FSC/SFI	m	45° 42' 43" N	-91° 3' 9" W	'Greg Peterson'	greg.peterson@sawyercountygov.org	115,197.28	0	115,197.28
Taylor	FSC/SFI	n	45° 19' 15" N	-90° 3' 47" W	Aszmann Russ	russ.aszmann@co.taylor.wi.us	17,557.28	18.86	17,576.14
Vernon	Not Certified		43° 35' 16" N	-91° 0' 29" W	Andy LaChance	andy.lachance@vernoncounty.org	997.46	0	997.46
Vilas	SFI		46° 2' 8" N	-89° 17' 19" W	Larry Stevens	vcfor@co.vilas.wi.us	40,971.42	101.27	41,072.69
Washburn	FSC/SFI	o	45° 57' 3" N	-91° 44' 54" W	'Mike Peterson'	mlpeters@co.washburn.wi.us	148,342.18	721.67	149,063.85
Wood	FSC/SFI	p	44° 22' 45" N	-90° 6' 2" W	'Fritz Schubert'	fschubert@co.wood.wi.us	36,991.84	692.58	37,684.42
Totals :							**2,344,603.73**	**34,171.65**	**2,378,775.38**

Prepared by Division of Forestry, August 20, 2014
WI. Department Of Natural Resources

Total Acres	
FSC	1,645,027.92
SFI	2,201,663.70
Non-certified	8,270.93

1.4 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
# - 909 male workers	# - 59 female workers	
Number of accidents in forest work since last audit:	**Serious:** 0	**Fatal:** 0

1.5 Pesticide and Other Chemical Use

Commercial name of pesticide/ herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year (ha or ac)	Reason for use
Marathon Co.				
Oust XP	Sulfometuron	1.5 ounces per acre with 25	1 acre	Red Pine seedling releas

		gallons of water per acre		e from grass competition
Oust XP	Sulfometuron	1.5 ounces per acre with 25 gallons of water per acre	2 acres	Site prep abandoned agricultural field to treat grass competition before 2014 planting of tamarack
Garlon 3A Aquatic Herbicide	Tricolpyr triethylamine salt	Per label directions	Spot Spray Individual trees. Easement is 120 feet wide	Performed by Wright Tree Service under contract with American Transmission Company in the power line ROW per easement for woody vegetation
Escort XP	Metsulfuron	3 ounces	2.5 acres and 3+miles of trails	Kill Invasive species tansy-spot sprayed
Round Up	Glysophate	8 gallons	32 acres	Grassland conversion to native prairie
Milestone	Aminopyralid	6 ounces	7 miles of trails	Kill Invasive species-spotted knapweed and crown vetch-spot sprayed
Element 4	Triclopyr butoxyethyl ester	3 quarts plus 60 ounces	1.2 acres and 20 red oak trees	Treatment of willow and aspen for forest opening control and oak wilt disease control
Burnett Co.				
Garlon 4	Triclopyr	1 gallon	2-3 acres	Oak Wilt treatments
Accord	Glyphosate	22 gallons	44 acres	Site-prep for pine planting
Bayfield Co.				
Accord XRT	Glyphosate	3 pints	10 acres	Buckthorn Treatment
Rodeo	Glyphosate	167.42 gallons	449 acres	Red Pine

				Release
Forestry Garlon XRT	Triclopyr	33.2 gallons	213 acres	Red Pine Release
Sulfomet XP	Sulfometuron methyl	28 pounds	449 acres	Red Pine Release
Ashland Co.				
Garlon XRT	Triclopyr	1.54 Qt/ac	40ac	Site Prep
Accord XRT	glyphosate	2.05Qt/ac	40ac	Site prep
Oust	Sulfometuron methyl	1.03oz/ac	40ac	Site Prep
Killsall	Glyphosate	5% solution	17ac	Habitat Maintenance
Bayfield Co.				
Accord XRT	Glyphosate	3 pints	10 acres	Buckthorn Treatment
Rodeo	Glyphosate	167.42 gallons	449 acres	Red Pine Release
Forestry Garlon XRT	Triclopyr	33.2 gallons	213 acres	Red Pine Release
Sulfomet XP	Sulfometuron methyl	28 pounds	449 acres	Red Pine Release
Eau Claire Co.				
Cellu-Treat	Disoduim Octaborate Tetra hydrate	100 lbs.	60 ac	Control of annossum root rot.
Oneida Co.				
Milestone VM	aminopyralid	14 oz	2 ac	Broadleaf and grass control on campground pads and roads
Evade4 FL	prodiamine	2 qt	2 ac	Same as above
Makaze	Glyphosate	2 qt	2 ac	Same as above
Makaze	Glyphosate	9 qt	4ac	Kill broadleaf and grass vegetation for road widening project
Amine	2,4-D acid	4qt	4ac	Same as above
Oust	Lulfometuron methyl	9 oz.	4 ac	Same as above
Roundup	Glyphosate	1qt	Spot spraying	Control weeds in parking lot
Clark Co.				
Milestone VM	triisopropanolammonium salt of 2-pyridine carboxylic	20.16 oz	Spot Treatment	Invasive Control

	acid, 4-amino-3, 6-dichloro-			
Tordon K	picloram	48 oz	Spot Treatment	Invasive Control
Transline	clopyralid	31.2 oz	Spot Treatment	Invasive Control
Accord XRT	glyphosate	32 oz	Spot Treatment	Invasive Control
Accord AC	glyphosate	2.5 gal	4.3 ac	Planting Site Prep
Rodeo	glyphosate	26.75 gal	36.9 ac	Planting Site Prep
Garlon 4 Ultra	triclopyr	49.01 gal	91.51 ac	Oak Seedling Release
Polaris	imazapyr	3 qt	26 ac	Oak Seedling Release
Chopper Gen2	imazapyr	7.9 gal	51.2 ac	Planting Site Prep
Oust XP	sulfometuron methyl	3.25 lbs	51.2 ac	Planting Site Prep
Preference (Surfactant)	Alkylphenol ethoxylate, sodium salts of soya fatty acids, isopropyl alchohol	24 oz	Spot Treatment	Invasive Control
Activator 90 (Surfactant)	Alkylphenol ethoxylate, alchohol ethoxylate, tall oil fatty acid	3.25 gal	51.2 ac	Planting Site Prep
Marinette Co.				
Element 4	Triclopyr	57 gallons	107 acres	Site Prep for planting
Tordon 101	Picloram and 2,4-d	59.4 gallons	84.5 acres	Site Prep for planting
Tordon K	Picloram	7.5 gallons	22.5 acres	Site Prep for planting
Price Co.				
Element 4	Triclopyr	1 gallon	Less than 1 acre	Stump treatment for invasives control
Killzall II	Glyphosate	1 gallon	Less than 1 acre	Grass and weed control in Parks
Chippewa Co.				
Oust XP	Sulfometuron methyl	0.94 oz	Approximately 0.5 acres	Garlic mustard
Cornerstone Plus	Glyphosate	46 oz	Approximately 0.5 acres	Garlic mustard
Florence Co.				

Element	Triclopyr	12 gallons	5-10 acres	Oak wilt control
Sporax	SODIUM TETRABORATE DECAHYDRATE	<10 gallons	40 acres	Annosum Prevention
Vilas Co.				
Chopper	Isopropyamine salt of Imazapyr	16.42 oz./ acre	138 acres	Site preparation
Accord XRT [John Gagnon, CF]	Glyphosate [John Gagnon, CF] Glyphosate	1.54 qts/acre [John Gagnon, CF] 2 qts/acre	138 acres [John Gagnon, CF] 13.73 acres	Site preparation [John Gagnon, CF] Treat wildlife openings
Oust XP	Sulfomenturon methyl	1.0302 oz./acre	138 acres	Site preparation
Wood Co.				
Garlon	Triclopyr		20 acres	kill buckthorn
Chopper	Isopropyamine salt of Imazapyr	24-32 oz/acre	85 acres	Pre-planting site prep
Oust	Sulfomenturon methyl	1oz/acre	85 acres	Pre-planting site prep
Accord	glyphosate	1.5 qt/acre	85 acres	Pre-planting site prep
Forest Co.				
Roundup	Glyphosate	One gallon	One half acre	Kill garlic mustard
Oconto Co.				
Cellu-Treat	Disodium Octaborate Tetrahydrate	375#	366 acres	Annosum root rot
Langlade Co.				
Bullzeye	Glyphosate	25 gal	59	Garlic Mustard/ site prep
Oust XP	Sulfometuron methyl	4.47lbs	59	Garlic Mustard/ site prep
Lincoln Co.				
Cornerstone Plus	Glyphosate	3% Solution-Spray to Wet	20-25 acres	Garlic Mustard
Oust XP	Sulformeturon methyl	1 oz./ acre	9 acres	Garlic Mustard
Juneau Co.				
Cornerstone Plus	Glyphosate	2.5 to 5 gallons or 10 to 20 lbs	Approx. 10 acres	Spot treatment of garlic mustard.
Washburn Co.				
Spike20p	Tebuthiron	20 lbs	40 acres	Wildlfe

				Openings
Accord	Glyphosphate	498 quarts	332 acres	Planting site prep
Accord	Glyphosphate	201 quarts	201 acres	Plantation release
Garlon	Triclopyr	120 quarts	40 acres	Buckthorn control

1.6 Standards Used

1.6.1 Applicable FSC-Accredited Standards

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

1.6.2 SCS Interim FSC Standards

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

1.7 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 (m^2)	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	**To**	**multiply by**
Cubic foot (cu ft)	Cubic meter (m^3)	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	

1 board foot	= 0.00348 cubic meters
1,000 board feet	= 3.48 cubic meters
1 cubic foot	= 0.028317 cubic meters

2. Description of Forest Management

2.1 Management Context

2.1.1 Regulatory Context

Pertinent Regulations at the National Level	Endangered Species Act 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 Lacey Act Forest Resources Conservation and Shortage Relief Act National Resource Protection Act National Environmental Protection Act National Wild and Scenic River Act Native American Grave Protection and Repatriation Act Rehabilitation Act Architectural Barriers Act
Pertinent Regulations at the State / Local Level	***Wisconsin:*** Statutory authority to engage in forest certification (broadly interpreted): §§23.11, 28.01, 28.07, and 77.80 The County Forest Law (s 28.11 Wis. Stats.) 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

Regulatory Context Description

A description of the role of DNR liaison foresters working with County Forests can be found in the resource titled "WDNR Public Forest Lands Handbook 24605", beginning on page 210-10. Their primary involvement, as required by statute, is assistance in long-term and annual planning, delivery of technical assistance, and county forest timber sale approvals.

(The following was Adapted from previous reports)

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

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."

2.1.2 Environmental Context

Environmental safeguards:
The Wisconsin Natural Heritage Inventory (NHI) is consulted prior to forest management activities. Foresters work in consultation with Wildlife and Endangered Resources staff to address any occurrences. Forestry, wildlife and ER staff often conduct additional site surveys for species if the NHI database indicates the need. The NHI system allows for reporting of any additional occurrences by a variety of staff. Impacts to RTE species are documented in timber sale files and the timber sale cutting notice (Form 2460). County staff cooperate and collaborate with Wisconsin DNR staff on upcoming timber sales during the Annual Interdisciplinary Meeting held at the regional level to receive additional input on RTE species detection and management. One significant change in 2014 is that County staff are more consistently filling out the section of the 2460 form for RTE species detection using the NHI database.

Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:
Management activities that impact RTE species and habitats occur regularly. Management activities are planned and carried out with consultation from wildlife and/or endangered resources staff and using species specific guidelines applied to local conditions to mitigate potential impact to RTE species and habitats. DNR has guidance for RTE species in terms of nest buffer areas and timing of harvest. In 2014, specific management measures for Karner Blue butterfly habitat was being employed in Jackson, Clark, Eau Claire, and Juneau Counties. This species requires early succession habitat and a certain density of a local lupine species. These activities were being carried out in accordance to a regional Habitat Conservation Plan (HCP).

2.1.3 Socioeconomic Context

(Adapted from 2009 report)

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

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.

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.

2.1.4 Land use, Ownership, and Land Tenure

(Adapted from 2009 report)

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."

The following paragraphs describing the Socio-economic context for the Wisconsin County Forest Program are excerpts from the C*ounty 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.

2.2 Forest Management Plan

Management Objectives:
WCFP management plans are complemented by the Wisconsin Forest Management Guidelines (WFMG), published by DNR and revised in 2011. This document presents an excellent history of forest conditions and natural disturbance regimes. Objectives are clearly presented in WCFP plans, and future conditions and activities are presented in WisFIRS models, AWPs, and Planning Meeting Minutes. There is some variation among plans in the presentation of desired future conditions.
Forest Composition and Rationale for Species Selection:
WCFP management plans are complemented by the Wisconsin Forest Management Guidelines (WFMG), published by DNR and revised in 2011. This document presents an excellent history of forest conditions and natural disturbance regimes. Objectives are clearly presented in WCFP plans, and future conditions and activities are presented in WisFIRS models, AWPs, and Planning Meeting Minutes. There is some variation among plans in the presentation of desired future conditions.
General Description of Land Management System(s):
General references are contained in Chapters 500 and 800 of county plans. The DNR Silviculture Handbook is the primary reference for this element of the plan. Specific silviculture plans are part of Form 2460 and discussed in AWPs.

The degree to which harvest rate calculations were presented in Chapter 800 of county plans varies among counties, but the Public Lands Handbook is the primary reference for harvest rate calculations. Species selection for harvest is a product of annual updates from forest recon and the programming of the WisFIRS system.

Harvest Methods and Equipment used:

Although there are general descriptions of harvesting equipment in WFMG, specific requirements for machinery or special provisions for harvesting are included in prescriptions for each harvest and described on Form 2460. Most harvesting on WCFP is done with processors and forwarders, generally considered to have minimal impacts on resources.

Explanation of the management structures:

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

DNR liaison:

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

Wisconsin County Forests Association (WCFA)

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

Individual Counties:

- Comprehensive Land Use Plans (CLUP or county plan)
- Annual Work Plans (AWP)
- Partnership meeting minutes
- Timber Sale Contracts
- Timber Sale Cutting Notice & Report - Form 2460

2.3 Monitoring System

Growth and Yield of all forest products harvested:

WisFIRS is a comprehensive system for guiding the reconnaissance and inventory of forest compartments as well as for scheduling harvest and other management options of stands. All of the elements listed in this indicator are included in compartment reconnaissance (WDNR Public Forest Lands Handbook 2460.5). Recon was completed in CY 2013 on 161,583 acres.

CY13 harvest: 634,309 cords equivalent (rpt. 37A – CY13- FSC only) as maintained in WisFIRS. Records are kept of harvested timber and then entered into WisFIRS before annual updates on harvest scheduling. Records for harvest of firewood and NTFPs are maintained, as well as for any products harvested by members of tribes. Harvest data from TimberBase 2013 are manually entered into WisFIRS for long-term tracking.

Forest dynamics and changes in composition of flora and fauna:

Most of these data are collected and maintained by personnel with Bureaus of Wildlife and Endangered Resources. Results of such monitoring are made available to county forest managers during periodic

meetings of interdisciplinary teams and/or during review of proposed management operations. Wildlife Surveys 2013-14: Nesting bird surveys, grouse transects, summer deer observations, winter track surveys, bear surveys and a variety of other wildlife and plant monitoring. Forest Health Monitoring which includes gypsy moth and EAB surveys. In January of 2014 a final report was issued as part of a baseline survey for invasive species which occurred in 2012 and 2013. The survey included selected sites in seven county forests in northern Wisconsin which were surveyed for a targeted list of terrestrial invasive plant species.
Environmental Impacts:
County and DNR foresters indicated that they visit active harvest operations several times a week; assessment forms are in writing and were inspected during the field audit (attached to timber sale documentation). BMP monitoring for water quality, soil disturbance monitoring, and vernal pond monitoring was reported by county foresters to the administrator in preparation for the 2014 audit. WCFP requires annual reports and annual work plans for each county. AWPs routinely include information on the system of forest roads and make annual requests for road improvements and maintenance. The Wisconsin's Forest Practices Study (WFPS) will include information on roads in its examination of the impacts of Wisconsin's forestry practices.
Social Impacts:
See County Forest Comprehensive Land Use Plans Ch 500. Additional monitoring information is available through WCFA (http://www.wisconsincountyforests.com) and WDNR (http://dnr.wi.gov/topic/CountyForests/monitoring.html . WCFA is sponsoring a forestry practices study that is expected to cover the information required in this indicator for long-term socioeconomic impacts (http://www.wisconsinforestry.org/initiatives/current/forestry-practices-study). Meeting minutes with the public and Citizen Advisory Councils serve as a record of stakeholder interaction. Communication with tribal representatives is on-going, assuring that any opportunities for joint monitoring of cultural sites are made available to tribes.
Costs, Productivity, and Efficiency:
County Forestry Committees and County Boards develop budgets annually. WCFP administrators can provide any documentation of Department budgets that is requested. WisFIRS Reports 36 A and 37A contain stumpage value for sales completed by year. Quarterly and annual accomplishment reports show progress throughout the year for various work goals (timber sale establishment, reforestation, etc.). Timber sale inspections monitor at sale level. WisFIRS can be used to generate reports on revenue from timber sales for a given time period.

3. Certification Evaluation Process

3.1 Evaluation Schedule and Team

3.1.1 Evaluation Itinerary and Activities

11 – August – 2014	
FMU/Location/ sites visited	**Activities/ notes**

Super 8 Motel – Neillsville	Pre-opening meeting. Approximately 90 minutes sometime between 5:15-8:00pm (dependent on arrival times) to cover introductions between auditors, WCFA, and WDNR staff; discuss Wisconsin County Forest program structure and management systems, and finalize some logistics for upcoming field audits.
12 – August – 2014	
FMU/Location/ sites visited	**Activities/ notes**
Jackson County Office	Opening Meeting: Introductions, client update, review audit scope, audit plan, intro/update to FSC and SCS standards and protocols, review of open CARs/OBS, final site selection
Jackson County	1. Sale 2314: even-age coppice for red maple regeneration with overstory removal of oak and red maple, and retention favoring white pine, bur oak and white oak. Other oak species present in adjacent stands. Discussion of regeneration surveys and WisFIRS, habitat classification using Kotar system and recent habitat classification training, and invasive species. 2. Compartment 130: Jack pine budworm salvage with site prep using power trench. Replanted site with red pine due to presence of budworm in adjacent Jack pine stands; hazelnut, cherry, and oak regeneration present. Seed source discussion. 3. Sale 2224: White pine thinning with Jack pine overstory removal. Objective to release oak in overstory removal area and maintain Jack pine as a secondary component on this site. Interviews with individual county and WDNR employees. 4. Bauer Brockway Barrens: prescribed burn for Jack pine and early successional herbaceous habitat for RTE species through partnership with WDNR, County Forest, and USFWS. Barrens include state and county lands. Burns conducted every five years in different sites on this 170 acre area. 5. Ruffed Grouse habitat: aspen clearcut adjacent to uncut area to promote habitat; interview with two local recreational users. 6. Wazee Lake: recreation area. Discussion of mining site reclamation, recreational activities, and ongoing management for early successional habitat established. Interviews with individual county and WDNR employees. 7. Sale 2300: White and red pine thinning. Observation of small stream (<3 ft) RMZ. Discussion of thinning operations and contracts. Evidence of vandalism to gate. 8. Sale 2201: Oak thinning with four group selection areas. Equipment exclusion zone for wetland headwaters site. Discussion of chain of custody system. 9. Sale 2317: active oak shelterwood; removal of poplar, maple, and white pine to prep site for regeneration (stump treat maple, scarify soil, prescribed burn in one portion of site). Oak overstory retained and spaced evenly. Interview with logger on training, insurance and safety, and inspection of equipment.
13 – August – 2014	

FMU/Location/ sites visited*	Activities/ notes
Clark County (FSC team)	1. Opening meeting for Clark County: overview of county. 2. 2012 Red pine planting at Tract 4-12: Experimentation with different disking and trenching for planting; broadcast spray for site prep; discussion of timing of harvest, site prep, and planting to control weevils while avoiding use of pesticides. 3. Invasive species treatment: control of Japanese knotweed through herbicide application and mowing; BMPs for cleaning equipment after treatment; general discussion of biological control. 4. Levis Mound Trail: Discussion of recreation through restoration and timber harvest sites, use of trail system, user fees, chain of custody, and opportunities for new recreation infrastructure. 5. Winx Flowage: Migratory bird refuge, artificially created via installation of old town road. Road converted to a dike to increase water level for wetland and shore bird species. Maintenance is in cooperation with Winx Club. Long-term monitoring plot in this area included as part of HCVF monitoring project funded through a sustainable forestry grant. 6. Chili Rd oak shelterwood: Discussion of training on safety, fire, and chainsaws.65 acres scarified in 2011 and 2012. Securing regeneration on one part of harvest likely difficult due to timing of harvest, drought, and red maple competition. Further scarification planned for 2014-15. Area with good regeneration likely due to better spacing and timing of harvest and site prep. 7. Sale 1355: aspen thin and clearcut. Marked cut trees and whole tree chipped on site. Thinning in higher quality stand with aspen coppice in adjacent area. Blue paint along spruce swamp. Some aspen left as cavity trees, but most retention was oak and pine. Biomass BMP discussion. 8. Sale 1646: Oak overstory removal. Release of advance oak regeneration; use of height and density to determine stocking. Logger flagged skid trail. Discussion of safety and pre-harvest meetings. 9. Sale 1445: Jack pine-Red pine thinning converted to selection and overstory removal. Winter logging to harvest in wetland; no rutting or residual stand damage observed. Observation of wetland buffers. Discussion of harvest timing and extension policy. 10. Sale 1394/1395: private firewood sales. Examination of harvest permit, inventory, and meeting objectives for the site. Observation of stream buffers for small stream (15 ft). 11. County Office: review of chain of custody; demonstration of WisFIRS and TimberBase 2013; explanation of inventory system and sustained yield calculation.
Eau Claire (SFI team)	
14 – August – 2014	
Juneau County (FSC lead)	1. Opening meeting for Juneau: overview of county. Discussion of

	training and working with WDNR. 2. Tract 6-11: Clearcut, with individual tree retention of white pine and white oak, to release black oak regeneration. Some leave-trees cut and reported to County due to damage during felling. Wetland buffer of 15 ft. Winter logged, some tops in swamp, but only near edge. Within Karner Blue Butterfly habitat range, may be suitable. Examination of stumps for leave-tree marks, none found. 3. Tract 4-12: Similar clearcut to 6-11 with retention. Property boundary marked; sale boundary ~10 ft from property boundary. Examination of stumps for leave-tree marks, none found. 4. Tract 3-13: Third red pine thinning. Re-entry set at 10-15 years depending on basal area; can conduct upwards of 5 thinnings over time. Use of hot-saw, processor, and skidder for operations. Objective is to maintain red pine on this site. 5. Tract 3-11: Proposed prescribed burn to re-establish Jack pine and thin oak retention areas to deal with site heavily impacted by oak wilt. Will be WDNR silvicultural trial area. Discussion of fire safety and planning. 6. Previously established Jack pine restoration. Use of disking and seed-bombing after plow. 7. Hamel tract acquisition (>800 acres): Review of special site management plan and recon. Discussion of recreation plans and review of environmental impacts prior to trail infrastructure upgrade. 8. Tract 7-13: Leave-tree marking for two areas to be harvested in 2015 or later. Clearcut with reserves for black oak site (retain some black oaks of various sizes). Harvest larger oaks due to size and impending mortality. Single-tree selection area to release understory regeneration and reduce silver maple basal area. Swamp white oak, bitternut hickory, black walnut, green ash, and silver maple retained. Final basal area objective of 70. 9. Tract 1-12: Salvage of aspen after a tornado in 2012. Removal of downed trees and retention of healthy trees over 37 acres. One area affected un-entered due to access issues. May serve as comparison over time. 10. Tract 5-11: Aspen regeneration site (marked, not harvested). Winter harvest is mitigation for nearness to wet-site and potential presence of species of concern. Part of snowmobile trail. Will harvest 2015 or later depending on weather.
Marathon County (SFI lead)	
Chippewa (Team auditor)	1. Sale 1183: Red pine thinning along Ice Age Trail. Garlic mustard located and treated. Meetings and concerns of hikers addressed. Use of standard DNR mix for restoration of trail surface used during logging operations. 2. Sale 1184: This sale was an oak shelterwood located in the area of the Hickory Ridge Ski Trail. Discussion of oak regeneration

	surveys that will be used to help determine when to complete the final harvest. Good wetland BMP's and use of retention along an SNA border. 3. Sale 1208: Established harvest in a parcel of land acquired (120 acres). The home on the parcel is used by the Ski Club as a warming house. The County has a maintenance contract with the club for winter maintenance. 4. Sale 1193: Looked at a permanent wet road crossing that was installed with money from a Sustainable Forestry Grant. Good utilization of Wisconsin BMPs. 5. Sale 1180: Active harvest in an oak shelterwood. Asked contractor to windrow slash to make scarification work easier. Interview with Mike Prokop, the owner of MRP Trucking. 6. Sale 1159: Oak scarification and regeneration oak in a 2012 shelterwood harvest. Used anchor chain for scarification and have done regeneration surveys on the site. 7. Sale 1161: Red maple overstory removal. Good rehabilitation of roads/trails on steep pitches (waterbars). Looked at a rehabilitated stream crossing which showed excellent use of mats and implementation of BMP's. 8. Sale 1215: Aspen regeneration harvest. Many wetlands on this site (and most Chippewa Co. sites) and use of yellow paint to mark wetland boundaries and buffers. Retention on the site was >5% of the area in buffers and green trees and snags. 9. Sale 1154: Partially completed harvest in a mixed swamp hardwood stand. Initial prescription called for a strip thinning. This was changed to a selection harvest of ash to adjust to recommendations that just came out in the Silivicultural handbook. Frozen ground condition and use of slash prevented rutting on the site. 10. Sale 1181: Walked through Deer Fly Swamp SNA and into adjacent stand that was marked and will be harvested under the Big Tree Management guidance. The goal for the site is to achieve biological maturity of tree species. 11. Horse Park: Parking lot and horse trail. Saw manure containers that are used to compost horse manure. 12. Hay Meadow 2 flowage and water control: County is partnering with DNR to conduct studies on their flowages and control devices to determine future management of these structures.
15 – August – 2014	
FMU/Location/ sites visited*	**Activities/ notes**
Clark County offices	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm audit findings
	Closing Meeting and Review of Findings: Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps

3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	4
B. Number of auditors participating in on-site evaluation:	2
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
D. Total number of person days used in evaluation:	**11**

3.1.3 Evaluation Team

Auditor Name:	Kyle Meister	**Auditor role**:	FSC Lead Auditor
Qualifications:	Kyle Meister is a Certification Forester with Scientific Certification Systems. He has been with SCS since 2008 and has conducted FSC FM pre-assessments, evaluations, and surveillance audits in Brazil, Panama, Mexico, Costa Rica, Bolivia, Indonesia, India, Japan, New Zealand, Spain, and all major forest producing regions of the United States. He has conducted COC assessments in Oregon, Pennsylvania, and California. Mr. Meister has successfully completed CAR Lead Verifier, ISO 9001:2008 Lead Auditor, and SA8000 Social Systems Introduction and Basic Auditor Training Courses. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan; and a Master of Forestry from the Yale School of Forestry and Environmental Studies.		
Auditor Name:	JoAnn Hanowski	**Auditor role**:	Wildlife biologist/ assistant FSC/SFI auditor
Qualifications:	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 was 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 2007 JoAnn contributed regional ecological expertise to the annual surveillance audits of the MN DNR's FSC and SFI certificates.		
Auditor Name:	Tucker Watts	**Auditor role**:	SFI Lead Auditor
Qualifications:	Tucker Watts has over 30 years' experience in forest management, primarily in the southern U.S. He worked for many years for International Paper Company, first as a land management and procurement forester, then as an analyst, and finally as an environmental manager with considerable involvement in forest certification. Tucker has a BS in Forestry from Louisiana Tech, and MS in Forestry from Mississippi State University, and an MBA from Centenary College. He has participated in many forestry organizations, notably as a Trainer in the Louisiana Master Logger Program, as a team member for "Recommended Forestry Best Management Practices for Louisiana" and		

	on various SFI State Implementation Committees. Tucker is trained as a Tree Farm Group Certification Auditor and has experience in SFI and FSC auditing from both sides, as an auditor and as the management representative of an organization being audited. Audit experience includes audits of pulp and paper mills, container and box companies, printers, distributers, and audits of recovered fiber and recycled content.

3.2 Evaluation of Management System

3.2.1 Methodology and Strategies Employed

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

3.2.2 Pre-evaluation

[X] A pre-evaluation of the FME *was not* required by FSC norms.

[ ] A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

3.3 Stakeholder Consultation Process

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

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

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

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

3.3.1 Stakeholder Groups Consulted During Evaluation for Certification

FME Management and staff	Pertinent Tribal members and/or representatives
Consulting foresters	Members of the FSC National Initiative
Contractors	Members of the regional FSC working group
Lease holders	FSC International
Adjacent property owners	Local and regionally-based environmental organizations and conservationists
Local and regionally-based social interest and civic organizations	Forest industry groups and organizations
Purchasers of logs harvested on FME forestlands	Local, state, and federal regulatory agency personnel
Recreational user groups	Other relevant groups

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments. The table below summarizes the major comments received from stakeholders and the assessment team's response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

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

Stakeholder Comments	SCS Response
Economic Concerns	
I do not approve of FSC's "certification" of our County Forest lands and wish to see label's meddling in local affairs put up or shut up. Either do a vastly better job at commanding higher prices at the marketplace for FSC-certified wood, or stop putting the high cost of a label that is not earning a cent more than un-certified wood on the shoulders of the producers, landowners, and taxpayers. If FSC is so great, why isn't anyone paying us extra to put it on the market? Dirty secret: because the vast majority of marketable wood in Wisconsin is certified and all competing at the same level. Stora Enso was genius in getting this State to certify the entire MFL, WCF, and State lands programs	According to Wisconsin DNR staff, DNR's data management system can be used to summarize financial information for sales, acres, and harvested volumes, but do not indicate whether a purchaser delivered any products as "certified." The audit team examined reports for FY2012 and FY2013 from WisFRS and confirmed that DNR tracks this information for WCFP. Since DNR allows the purchaser to determine whether or not to pass on the FSC claim, information on how much timber that originates from certified lands in Wisconsin would be best provided by Chain of Custody certificate holders. It is nearly impossible to tell from currently tracked data whether any individual county in WCFP has received a premium for any certified material. However, price premiums are but one way that certification can be used to earn additional profit. Certification provides access to certain markets, thus diversifying the potential customer base. Markets for certified material in Wisconsin include paper and packaging, and green building. Green building materials include a full range of wood products. Some information about markets for certified wood can be found in a report titled, "Review of Wisconsin's Investment in Forest

because they ensured a steady stream certified fiber at someone's else's cost. It is time for us to re-think the validity of that notion. There is zero market differentiation between a stick of wood cut on an MFL property from a stick of wood stolen off a County Forest job and they both fetch the same exact low-ball "certified" price at the mill. Maybe FSC should pay us for letting them do business on our lands. The way it stands now, the people of WI shoulder the burdens of a program that provides a negative return on investment simply so a lot of "stakeholders" can think they feel pretty good about their perception of forestry.	Certification: Expenditures and Impacts 2005 to 2012." The report, authored by the Council on Forestry Steering Committee (11/13/2013), includes a summary that recognizes both benefits and costs of certification. Benefits discussed include access to markets for certified forest products and continuous improvement of forest practices. Costs cited include those related to audits and responding to and implementing corrective action requests. One way of monitoring the benefits of certification is to track the number of FSC and SFI certificates, which is included in the report. By viewing the type of products produced from certified wood, one can get an idea of some of the economic impacts. The report covers more of these items in detail and shows that DNR is monitoring the economic impacts of certification with consideration for positive, negative, and neutral outcomes. There may be additional information forthcoming following the Wisconsin Forest Practices Study, which is being led by the Wisconsin Council on Forestry, the Great Lakes Timber Professionals Association, and the Wisconsin County Forests Association. In addition to its understanding of forest certification impacts, WCFP tracks its costs, revenues, and other economic impacts of its forest management system (e.g., recreation). Thus, WCFP maintains a high level of monitoring of its economic performance. No non-conformance is warranted.
Social Concerns	
The Wisconsin DNR's "liaison" services to the various County Forests is the greatest detriment to the WCF program. Wisconsin County Forests are the premier model of public-agency forest management in our Nation and survive and thrive better with less DNR input/oversight/over-reach. Get the DNR out of the WCF's handlings and see vast improvement.	The Wisconsin County Forest Program (WCFP) was established per County Forest Law (s 28.11 Wis. Stats.). Per this statute, Wisconsin DNR must be involved in the management of Wisconsin County Forest Program. No conflicts were identified between this legal requirement and the FSC standard. A description of the role of DNR liaison foresters working with County Forests can be found in the resource titled "WDNR Public Forest Lands Handbook 24605", beginning on page 210-10. Their primary involvement, as required by statute, is assistance in long-term and annual planning, delivery of technical assistance, and county forest timber sale approvals. SCS interviewed Wisconsin DNR and County staff individually to ask how the relationship between the two organizations functions operationally. All County staff interviewed see the relationship as overwhelmingly positive and do not view the DNR's involvement as a threat to local decision-making processes. County staff view the relationship more as a peer-to-peer opportunity for the sharing of information, management tools, and training. DNR is able to complete projects that County foresters plan in cases where County staff may lack sufficient resources, such as large-scale prescribed burns in Juneau County. When asked about how the DNR's involvement affects efficiency, several County staff mentioned the

	benefits of WisFIRS, which is a DNR-developed project management tool that allows County staff to create and track the implementation of site-specific plans. Many DNR liaison foresters in the Counties visited in 2014 have worked as County foresters, which likely contributes to the overall feeling of a collaborative relationship. No nonconformance is warranted.
Environmental Concerns	
Most familiar with management on County Forests in north central and northeast WI. When counties were certified in WI, there was the hope we'd see changes in road management, legacy trees, HCVFs, etc. Have not seen any significant changes since they became FSC. For example, a recent sale set up in Iron County (which was subject to the cutover that most of N. WI experienced), had a stand where numerous large (2 ft plus diameter some over 30 inch) yellow birch were scattered throughout the stand. All were marked to cut. Why weren't some left for seed production/regeneration? What remained after harvest were pole sugar maple, how wasn't this unique feature a HCVF aspect of this stand and measures taken to ensure Y. Birch regen? We are losing beech, ash, and hemlock to exotic pests, so yellow birch is an important component to maintain in these Northern hardwood types. We have done work with yellow birch regeneration and nurse logs and gap size and placement with some regen success It's hard to see where HCVF enters into County Forest planning. Observations of actual timber sale setup and harvest, leave the impression that HCVF takes a back seat to standard industrial forest management. Many of the counties are dominated by young	While large-diameter yellow birch may be a unique feature, it likely does not meet the definition of HCVF according to the six recognized types. HCVs may include significant concentrations of RTE species, old growth that meets the FSC-US definition, and ecosystem services in critical situations. See Appendix F of the FSC-US standard for more information. It was found that WCFP that further work may be necessary to determine the scope of any misclassification or misunderstanding of HCVs within WCFP's management system. **OBS 2014.3.** While no northern hardwood stands were observed during the 2014 audit as auditors were south of the tension-zone, Clark County demonstrated how its approach to aspen management would lead to a more even age class distribution over time through a combination of delaying and moving some harvests forward. This should avoid placing too many aspen stands within the same age class over time. Specifically, the management plan which the public has an opportunity to review outlines proposed management for the County Forests. In some instances, for example, on lands specifically managed for wildlife purposes (primarily ruffed grouse and white-tailed deer), the rotation age for aspen may be shortened by 5-10 years. Foresters prescribe projected harvest dates for each individual stand, based on stand and site conditions and management objectives, then WisFIRS (WCFP's and DNR's project management program) calculates those prescribed harvest dates along with property-specific average harvest intervals and early/late harvest constraints to establish an annual and long term harvest schedule. The WisFIRS system attempts to regulate (even-out over multiple years) the annual harvest level by species, within the property specific constraints. The harvest schedule provides a list of stands that should be examined for potential harvest each year . Finally, a forester evaluates the stands that have been identified for harvest in a given year and establishes a timber sale or re-schedules the harvest for a future date depending on the stand conditions in the field. The audit team did not find any instances where a County has manipulated the WisFIRS output for stands to examine to meet the Young Forest Initiative. As no harvests with hemlock, beech, yellow birch, and other northern hardwood species were observed in 2014, this comment was difficult to evaluate for that forest type. However, a marked,

forest <50yrs and dominated by maple and aspen. Considerations of becoming more diverse in both species and age-class distribution should be a major planning consideration. Biomass harvesting – diversifying economic return and economically viable products harvested from county forest appears to override long-term sustainable forest management implementation. As woody biomass markets increase, so will the demand for counties to sell what they can produce from their lands. The state of Wisconsin recently revisited it's harvesting guidelines for woody biomass. The counties, with industry, pushed back on some of the restrictions related to harvesting on nutrient poor soils. Their main point was, until we see a problem there shouldn't be unnecessary restrictions on the harvest of biomass. Even in light of research completed by Dr. David Mladenoff from UW-Madison that modeled nutrient loss and loss of productivity, in many cases, after the first rotation. Young Forest Initiative – There's has been a recent push by the state to emphasize the management for young forest (almost exclusively Aspen). While there appears to be an issue with the age class distribution of aspen across the state and across public and private ownerships, landscape patterns need to be considered before the clock is reset on all aspen age 35 and older. The golden-winged warbler has been the keystone species the proponents of the Young Forest Initiative using. While	but not harvested, timber sale was observed in Juneau County that had several unique features, including an upland black oak area marked for overstory removal with retention of some smaller diameter black oaks and an adjacent single-tree selection area with retention of all species in various size classes. The single-tree selection area should favor heavier-seeded species groups (oak, hickory, walnut) that are currently being over-shaded by silver maple. Individual trees with healthier crowns and potential den trees were selected for retention. Winter harvesting should ensure low impacts to sensitive soil and water resources. On a final note on the topic of the Young Forest Initiative and yellow birch/ hemlock management strategies, the specific concerns of retention and age class distribution among other counties, especially those in the northern part of the state, will have to be examined onsite in future audits. The current biomass harvesting guidelines that WCFP uses are available on the DNR website. However, the guidelines have gone through a review and update process –and the final revised version will likely be distributed sometime in late September 2014. The proposed (DRAFT) changes to the guidance were put out for public review in May 2014 and were open for comment for a 21-day period following stakeholder meetings in 2013. The draft changes include guidelines for what biomass materials to retain on dry, nutrient poor soils and other nutrient-poor or-limited sites. One of the changes in biomass harvesting guidelines was due to evidence that crown-breakage occurs in the field that meets retention guidelines. Several University and DNR research projects on sites in Wisconsin, Michigan, and Minnesota were conducted between drafting of the original guidelines and the revision that is nearly complete. Research by DNR and partnering universities focused on gaps in knowledge that were identified during the development of the initial guidelines. DNR provided a summary of references to a number of publications and research projects that were referenced during the revision of the guidelines. This presentation was provided to the biomass harvesting guideline advisory committee during the revision process, the second to last page is most informative about crown-breakage. The identified target has been to retain ~5 tons/acre of down woody material – the additional research found that incidental breakage resulted in an average of 7.2-10.2 tons per acre. SCS followed up on the research that the stakeholder cited and received the following response: *We have not yet written the results nor published them; it is on our agenda. I only gave a ppt talk to the biomass harvesting committee.*

Golden-wings do use young aspen, brush, especially alder was the habitat primarily utilized prior to the cut-over. If the counties are talking about the YFI, please investigate to see if they are considering landscape pattern. WI has very little old forest and deer have and are impacting the ability to effectively manage for a mixed species mature hardwoods, hemlock, mixed pine and cedar stands. Placing young forest in large blocks of hardwood will only exacerbate the deer browse and forest regeneration issues.	*The gist of our results is that there are negative effects that suggests whole tree harvesting on this coarse sand in oak and aspen is non-sustainable. See the abbreviated ppt attached.* *Three 50 year rotations is shown in the summary slide.* *We recommended no change to the guidelines, that is continuing to restrict removal of tops and branches in this system.* *We also recommended we be given funding to model more diverse soils, but that was not agreed.* Given that the comment period was open to all stakeholders, DNR allowed for comments regarding the retention and distribution of course and fine woody debris on different ecosystems. A summary of the research used to devise the updated guidelines was included as part of the consultation. These guidelines focus on retention of fine woody debris on nutrient poor areas, and to not change the allowance for harvest of course woody materials via harvest on these sites. That is, whole-tree harvesting is not recommended and retention of existing course woody debris is recommended for these nutrient poor sites. These sites will have longer reentry periods due to the length of rotations, so there will be time for further research to fill the gaps of information. Lastly, given that the final version of the guidelines has not yet been released, a full determination of how substantial the changes are could not be completed. No nonconformance is warranted.
The forest management operation has designated too many set-aside and protected areas.	As reported in the FSC Certificate Registration Information, item 1.2.3 – Conservation Areas in this report, the total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives totals 30,353 acres for all counties with the scope of the FSC certificate. In addition to those acres that are protected from harvest primarily for conservation purposes, there are additional lands that are excluded from harvest for other reasons (e.g. poor access, etc.) that are not included for potential harvests, which account for an additional ~16,515 acres. Total forested acreage not scheduled for management therefore is ~46,868, which is ~3.4% of the 1,373,096 total forested acres located on the FSC certified County Forests. Roughly 96.6% of these County Forest is open to timber harvest, which, given WCFP's social and environmental mandates, is significant. No nonconformance is warranted.

4. 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. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C.

Principle / Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard
P1: FSC Commitment and Legal Compliance	The management plan and contracts are designed to comply with legal requirements.	None.
P2: Tenure & Use Rights & Responsibilities	County staff work with a variety of stakeholders on public use options so that sensitive resources are considered in management activities.	None.
P3: Indigenous Peoples' Rights	Most Counties maintain direct lines of communication with tribes that may have treaty rights or special sites. Where a tribe may have rights or resources in multiple counties, County staff from the involved counties often work together to address communications with affected tribes.	None.
P4: Community Relations & Workers' Rights	County and DNR staff turnover rate is low. County staff may move on to DNR positions located near their communities, which promotes greater collaboration and continuity between the two organizations.	Minor CAR 2014.1.
P5: Benefits from the Forest	Firewood, NTFPs, and other small-scale sales ensure that small businesses have the opportunity to bid on contracts on County lands.	None.
P6: Environmental Impact	The use of WisFIRS to manage projects reduces the chance of human error in conducting project-level assessments. State-level wide guidelines ensure both consistency in the implementation of BMPs, and flexibility when unique situations arise.	OBS 2014.2.
P7: Management Plan	County staff demonstrate a high level of familiarity with their components of the management	None.

	plan. Management plans are open to all of the public and also undergo review by County commissioners.	
P8: Monitoring & Assessment	WisFIRS provides an integrated system for tracking most monitoring activities and ensures a high level of consistent monitoring across Counties.	None.
P9: High Conservation Value Forests	No exceptional strengths noted.	OBS 2014.3.
P10: Plantations	NA	NA
Chain of custody	None.	None.

4.2 Process of Determining Conformance

4.2.1 Structure of Standard and Degrees of Nonconformance

FSC-accredited forest stewardship standards consist of a three-level hierarchy: principle, the criteria that correspond to that principle, and the performance indicators that elaborate each criterion. 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 nonconformance must be evaluated to determine whether it constitutes a major or minor nonconformance 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 nonconformance. The team therefore must use their collective judgment to assess each criterion and determine if the FME is in conformance. If the FME is determined to be in nonconformance at the criterion level, then at least one of the applicable indicators must be in major nonconformance.

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

4.2.1 Interpretations of Major CARs, Minor CARs and Observations

Major CARs: Major nonconformances, either alone or in combination with nonconformances of all other applicable 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 before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME's response to the CAR within the stipulated time frame.

Minor CARs: These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are

the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

Observations: These are subject areas where the audit team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

4.2.2 Major Nonconformances

☒	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
☐	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
☐	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.

4.2.3 Existing Corrective Action Requests and Observations

	Finding Number:2013.1
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	6.1.a
Background: Habitat classification is not being consistently recorded on the Timber Sale Notice and Cutting Report (Form 2460-1) in some counties (not the case for Douglas). We saw great understanding of habitat types and making appropriate forest type decisions for the site. However, audit team concludes that a more consistent documenting of habitat classification may be beneficial in making some cover type change decisions in borderline or difficult cases and would certainly add a key piece of information to the monitoring and historical records of a stand.	
Observation: WI County Forests should consider taking measures to ensure that the habitat type for each stand is documented.	
FME response *(including any evidence submitted)*	Wisconsin county forests routinely assess and record the habitat types in the stand detail page of the Wisconsin Forest Inventory and Reporting Systems (WisFIRS) and during recon updating. Additionally, foresters typically assess and document habitat types on the Timber Sale Cutting Notice (Form 2460) when establishing timber sales. Seasonality plays a significant role in proper habitat typing and as such, during periods of the year when plant identification is difficult this stand data is not necessarily recorded, unless the forester feels comfortable making the identification based on residual vegetation and other site features

	present. Following the 2013 county forest certification audit and the 2013 County & DNR Partnership meetings, several counties indicated an interest in holding a habitat type classification refresher course. WDNR Division of Forestry developed and delivered 3 habitat type classification refresher courses in spring and early summer of 2014, which were held in Clark, Oneida, and Sawyer Counties. These courses were attended by 40 county and DNR foresters that work on county forest lands. Attached below are the course announcement and the class rosters. There will likely be an additional 2-3 courses offered in 2015, if there is additional interest.
SCS review	In addition to the response provided, WI County Forests also provide records of the content of the refresher courses, and a list of attendees from each County Forest for the courses offered. Staff interviewed during the 2014 audit mentioned attending the training on habitat classification and that the work instruction for describing habitat types is in the Wisconsin Silviculture Handbook.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2013.2
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	6.3.a, 6.3.b
Background: The audit team is concerned that recent changes to the State of Wisconsin deer hunting regulations may result in over abundant deer populations. As observed in past audit years (particularly during years when deer numbers were higher than they are in 2013), herbivory from over abundant deer populations poses challenges to conformance with forest regeneration requirements of Indicator 6.3.a. Even at the current reduced population levels, county forests are required to use expensive measures (bud capping) to ensure regeneration of some planted stands.	
Observation: County Forests should consider developing forest regeneration strategies to use if increases in deer populations (projected from 2013 changes to State regulations) impact forest regeneration.	
FME response *(including any evidence submitted)*	County forest administrators and the Wisconsin County Forests Association have played very active roles in providing feedback regarding deer management, particularly as it relates to the impact of deer herbivory on successful forest regeneration. Over the past several years Wisconsin's County Forests have been represented in the Deer Trustee Report Implementation Process and the Deer Management Assistance Program advisory committee. The Wisconsin County Forests Association position paper on deer management is available at: http://new.wisconsincountyforests.com/wp-content/uploads/2013/08/white-tailed-deer-herd-management.pdf. County Deer Management Advisory Councils

	are being established statewide currently and county forest administrators have been invited to identify forestry representatives for these stakeholder groups. Wisconsin county forests also routinely monitor the impacts of deer herbivory on natural and artificial forest regeneration in ways that best suit their individual county needs and conditions. The WisFIRS recon system is often utilized to code for survival checks (Intermediate treatment HM 8). Many counties that have difficulty in establishing desired regeneration have developed additional systems for tracking regeneration of stands where regeneration is questionable. County forests make considerations when selecting silvicultural and cultural treatments to regenerate forests in order to account for the risk of herbivory; examples include species selection, sale design, and bud capping of young plantations. Finally, the winter of 2013-2014 was the most severe that Wisconsin has experienced in over 30 years, which was hard on deer and many conifers, but may be good for tree seedlings and saplings for the coming years. The impact on deer populations will likely be observed for several years; however, county foresters will continue to monitor impacts of deer and participate in the deer management forum.
SCS review	In addition to the response provided, WI County Forests provided a description and map of the Winter Severity Index (WSI) through Apr. 2014 for the past winter season, which shows that indeed this past winter had extended deep snow cover and low temperatures for much of the area where County Forests are located. The WSI was developed as a tool for tracking several impacts of winter seasonal conditions, including impacts on the deer population. The increased regeneration surveys may be used to show the impacts of deer browse over time. WCFP has also taken a proactive approach in dealing with this complex socioeconomic issue by ensuring that the forestry community has a voice on the deer management committees. Given that WCFP is ensuring data collection on regeneration along with involvement on these committees, it has taken a major step in tracking the impacts of deer browse and developing potential measures in cooperation with other stakeholders.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

4.2.4 New Corrective Action Requests and Observations

	Finding Number: 2014.1
Select one: ☐ **Major CAR**	☒ **Minor CAR** ☐ **Observation**
FMU CAR/OBS issued to (when more than one FMU):	

Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC-US indicator 4.2.b.
Non-Conformity *(or Background/ Justification in the case of Observations)*: Firewood and moss harvesting permits do not include safety requirements. Evidence: permits reviewed for Jackson (moss), Clark (firewood), and Juneau (moss).	
Corrective Action Request *(or Observation)*: Contracts or other written agreements shall include safety requirements.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.2
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): No deadline
FSC Indicator:	FSC-US indicator 6.3.f and 6.3.g.1.
Non-Conformity *(or Background/ Justification in the case of Observations)*: For even-aged red pine stands at final harvest, auditors observed un-entered retention islands with species that were generally representative of the dominant species found on the site (red pine, oak, maples, etc.). On aspen stands, individual tree and clumped retention observed consisted of oak and pine species, with little to no aspen retained. County forest managers stated that the reason for little to no retention of aspen within clearcut areas was due to forest health concerns such as conks (i.e., fungus) and insect pests.	
Corrective Action Request *(or Observation)*: WCFP should consider providing written justification for situations in which it opts to not maintain dominant species found on site, particularly in aspen stands.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.3
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): No deadline
FSC Indicator:	FSC-US indicator 9.1.a.
Non-Conformity *(or Background/ Justification in the case of Observations)*: HCV assessment framework appears to not have been updated. Examples include Juneau and Clark Counties, which include descriptions of recreational areas, ruffed grouse habitat, and other exceptional resources that likely do not meet the definition of HCV according the FSC-US framework. Certain HCV types are provided when WCFP reports HCV areas to SCS, but types are not specified in management plans (e.g., Winx Flowage). Post-audit, WCFP conducted a root-cause analysis and discovered that some of these areas were lumped into the HCV area due to a reporting error. The error involved selecting more special management areas in the reporting of HCV acreage to SCS. While the scale of the issue is small and WCFP presented evidence of the most up-to-date HCV classification, further work may be necessary to determine the scope of any further misclassification or misunderstanding of HCVs within WCFP's management system.	
Corrective Action Request *(or Observation)*: WCFP should ensure that HCVs are properly identified per the six recognized types in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F of the FSC-US standard.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

5. Certification Decision

Certification Recommendation	
FME be awarded FSC certification as a "Well-Managed Forest" subject to the minor corrective action requests stated in Section 4.2.	**Yes** ☒ **No** ☐
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols. If certification is recommended, the FME has satisfactorily demonstrated the following without exception:	
FME has addressed any Major CAR(s) assigned during the evaluation.	**Yes** ☒ **No** ☐
FME has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this	**Yes** ☒ **No** ☐

report) are met over the forest area covered by the scope of the evaluation.	
FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.	**Yes** ☒ **No** ☐
Comments: This is a mature certificate holder; management systems are well-aligned for continued compliance to legal and certification requirements, including socioeconomic and environmental mandates.	

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – Current and Projected Annual Harvest for Main Commercial Species

See sections 1.2.1 and 1.2.2 for current acreage and volumes harvested. The Wisconsin County Forests harvest rates are calculated and regulated on an area basis. The projected annual harvest (average annual harvest for the 15 year planning period- WisFIRS rpt 201) by main cover types are as follows:

11,898	ASPEN
154	BOTTOMLAND HARDWOODS
309	WHITE BIRCH
480	WHITE CEDAR
5	CENTRAL HARDWOODS
195	BALSAM FIR
309	FIR SPRUCE-*OLD CODE, RECODE
84	HEMLOCK
10	MISCELLANEOUS CONIFEROUS
12	MISCELLANEOUS DECIDUOUS
828	RED MAPLE
11,781	NORTHERN HARDWOODS
4,876	OAK
598	SCRUB OAK
1,049	JACK PINE
4,062	RED PINE
1,569	WHITE PINE
822	BLACK SPRUCE
246	SWAMP CONIFER
2,403	SWAMP HARDWOODS
144	WHITE SPRUCE
549	TAMARACK

42,383 Total acres

Appendix 2 – List of FMUs Selected for Evaluation

☐ FME consists of a single FMU

☒ FME consists of multiple FMUs or is a Group

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

FMU Name	FMU Size Category:	Forest Type:	Rationale for Selection:

	- SLIMF - non-SLIMF - Large > 10,000 ha	- Plantation - Natural Forest	- Random Sample - Stakeholder issue - Ease of access - Other – please describe
Chippewa	Large	Natural	Random sample
Clark	Large	Natural	Proximity to other FMUs
Eau Claire	Large	Natural	Proximity to other FMUs
Jackson	Large	Natural	Proximity to other FMUs
Juneau	Non-SLIMF	Natural	Proximity to other FMUs
Marathon	Large	Natural	Proximity to other FMUs

Appendix 3 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Steve Edge	DNR Forestry Team Leader		Field/ office for all
Jim Skorczewski	DNR Liaison		
Matt Hansen	Chippewa Asst Admin		
Chris Martin	Forestry DNR-Madison		
Dave Kafura	DNR Forest Hydrologist		
Nolan Kriegel	DNR LTE Forester		
Dan Masterpole	LCFM Dept. Director		
Bill Hogseth	DNR Wildlife Biologist		
Mike Dahlby	Chippewa County Forest Administrator		
Jody Stormoen	DNR		
Doug King	Juneau County		
Monty Brink	Juneau County		
Joe Schwantes	DNR		
John Schwingel	DNR		
Brian Loyd	Juneau County		
Ian Remus	Clark County		
Dave Spaude	Jackson County		
Eric Zenz	DNR		
Jeff Barkley	WCFA		
John Wendorski	Clark County		
Andy Sorenson	DNR		
Scott Roepke	DNR		

Jane Severt	WCFA		
Jim Zahasky	Jackson County		
Jon Schweitzer	Jackson County		
Jason Wood	Jackson County		
Greg Edge	DNR		
Larry Whaley	DNR		
Colleen Matula	DNR		
Joshua Pedersen	Eau Claire County		
Jody Gindt	Eau Claire County		
Doug Brown	Marathon County		
Carmen Hardin	DNR		
Courtney Schaefer	DNR		
Chad Keranen	DNR		
Luke Nigon	Clark County		
Rick Dailey	DNR		
Cody Caulum	DNR		
Einar Fransen	Clark County		
Brooke Ludwig	DNR		
Mike Dahlby	Chippewa County		
Mark Heyde	DNR		
Chris Martin	DNR		
Teague Prichard	DNR		
Tom Lovlien	Marathon County		
Dylan Bell	DNR		

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Matt Carothers	Prentiss & Carlisle	mlcarothers@prentissandcarlisle.com; 715-401-1167	Survey monkey; phone	Y
Matt Dallman	TNC	mdallman@tnc.org; 715-358-6305	Phone; email	Y
Gordy Mouw	NewPage Corp	Gordon.Mouw@newpagecorp.com; 715-422-3295	Survey monkey	Y
Ron Lee/ Sharon Wood	NA	608-254-4316	Field	N
Dick Chose	Winx Club		Field	N
Perry Nickolay	PNS Logging	715-305-0332	Field	N
David Mladenoff	University of Wisconsin – Madison	djmladen@wisc.edu	Email	Y
Anonymous stakeholders				

Appendix 4 – Additional Evaluation Techniques Employed

No additional techniques employed.

Appendix 5 – Certification Standard Conformance Table

C= Conformance with Criterion or Indicator
C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances
NC= Nonconformance with Criterion or Indicator
NA= Not Applicable

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles **Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.**		
1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
1.1.a *Forest* management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and ***administrative requirements*** (e.g., regulations). Violations, outstanding complaints or investigations are provided to the ***Certifying Body*** (CB) during the annual audit.	C	The Wisconsin County Forest Program (WCFP) was established per County Forest Law (s 28.11 Wis. Stats.) (County Forest Comprehensive Land Use Plans (CLUP) – Ch 905(typically), 28.11 Wis. stats., NR 47, NR 48, & NR 51, Wis. Admin. Code.). All management planning documents are based on applicable laws and regulations cited in 2.1 of the FSC report. Forest Management Plans (FMPs) were reviewed for all counties visited. A description of the role of DNR liaison foresters working with County Forests can be found in the resource titled "WDNR Public Forest Lands Handbook 24605", beginning on page 210-10. Their primary involvement, as required by statute, is assistance in long-term and annual planning, delivery of technical assistance, and county forest timber sale approvals. Documentation of any violations or lawsuits is maintained by County Forest Administrators. No counties reported violations to legal requirements or any new or on-going lawsuits related to their county forest lands.
1.1.b To facilitate legal compliance, the ***forest owner*** or ***manager*** ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable	C	Contracts reference applicable laws and regulations (e.g., Jackson Timber Sale contract and Eau Claire Timber Sale contract), including OSHA requirements. Wisconsin DNR & county

laws and regulations.		staff have access to several training opportunities that deal with compliance to BMPs, RTE species, and other legal/ regulatory requirements (refer to staff interviews, training records and online resources, e.g., http://dnr.wi.gov/topic/forestry.html).
1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	
1.2.a The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.	C	10% of stumpage payments are made from County Forests (county government) to municipalities (towns & villages). These payments are verified during periodic (every 3 years) internal audits of the County Forest program conducted by DNR in each county. The procedures for these audits are included in the WDNR Public Forest Lands Handbook. In addition, some County Forests work with a Citizen Advisory Committee that tracks fiscal performance and payments.
1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.	C	County forest staff demonstrated knowledge of treaties with tribes as well as the geographic limitations of those treaties (e.g., treaty for ceded territory of the Chippewa Tribe). Jackson and Clark County staff invite regular consultation from Ho-Chunk tribal representatives on planned management activities. Based on a review of the agreements referenced in the indicator, the U.S. is not a signatory and/or has not ratified several of the agreements referenced in the indicator (e.g. many ILO Conventions and Convention on Biodiversity) and others have very limited, or no, direct impact/applicability to County Forest management. Any wild ginseng harvests, which are subject to CITES, are regulated according to WDNR protocols

		(http://dnr.wi.gov/topic/endangeredresources/ginseng.html).
1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	C	There were no reported conflicts between legal requirements and FSC Principles & Criteria. No such conflicts arose during the 2014 assessment.
1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the ***Forest Management Unit*** (FMU).	C	Timber theft and trespass issues on County Forest properties are dealt with locally, and are typically investigated by county law enforcement, DNR forester-rangers, or county forest patrol officers. Refer to document titled WCFP FSC data request summary – C1.5 for a summary of incidents on each FMU. WCFP takes 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. Confidential surveillance techniques may also be employed in cases of recurring vandalism or trespass to catch the perpetrators. County Forests also mark boundaries in timber sales, and, in most cases, ensure that timber sales avoid cutting right up to the property line.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	Timber theft and trespass issues on County Forest properties are dealt with locally, and are typically investigated by county law enforcement, DNR forester-rangers, or county forest patrol officers. Wisconsin Statute 26.05 and 26.06 offer some flexibility in how timber theft and trespass cases are treated. Fines or payment of yield taxes or severance shares can be assigned. Such

		fines or payments are set between $100 and $10,000, but violators may be subject to criminal prosecution or required to cover additional expenses for the assessment and recovery of stolen timber (https://docs.legis.wisconsin.gov/statutes/statutes/26/05).
1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	C	
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	C	All County Forests have made commitments to FSC through County Board Resolutions, some of which are included in the 15-year plans. While the language does not explicitly include a commitment to FSC standards and policies, it states that it will accept and commit to FSC certification program and that management with be consistent with FSC standards (e.g., Clark County CLUP, 915.1). Other counties, such as Chippewa and Eau Claire, deal with commitment to FSC under Chapter 325 of the CLUP with language that can be used to reasonably infer full commitment to this indicator: "____ County has committed to the Forest Stewardship Council (FSC) in the management of ____ County Forest. These certification standards fit within the framework of the County Forest Law program (s. 28.11, Wis. Stats.)." 28.04 (1) (e) provides a definition for "sustainable forestry" that is in line with the intent of FSC.
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	C	Each county with forests under the Wisconsin County Forest program has the option to be certified to either or both of the FSC or SFI standard (http://dnr.wi.gov/topic/TimberSales/countyForests.html). Certified county forests may have limited amount of forestlands they hold outside of the FSC certificate, which are documented in the CLUP. In general, excluded forestlands are unsuitable for timber management due to species composition (i.e., low timber value),

		difficulty in regeneration, and other reasons as stated in each county's CLUP.
1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	C	WCFP informs SCS of all changes in ownership during the planning phase of audits. All acquisitions since the last audit have been well less than 0.05% of the size of each FMU, and were thus insignificant change in of size and changes to management practices. Acquisitions at Clark and Juneau Counties were reviewed during 2014.
Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	C	
2.1.a The forest owner or manager provides clear evidence of ***long-term*** rights to use and manage the FMU for the purposes described in the management plan.	C	County Land Information Department and Register of Deeds maintain all documentation related to ownership and use rights for all counties. Each county's CLUP includes an explanation of ownership and use rights and the authority to manage the FMU.
2.1.b The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.	C	Register of Deeds maintains any recorded agreements held with other parties. See County Forest CLUP– Ch 500 for policies specific to public use/access, including any schedule of public use fees.
2.1.c Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.	C	Maps included in timber sale prospectuses for each county visited in 2014 included property boundaries where they existed. As confirmed through interviews and observed on harvest sites, county staff in some counties indicated that harvests that abut ownership boundaries are typically set back 10 ft. from the boundary line to avoid any trespass issue.
2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies. *Applicability Note: For the planning and*	C	

management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.		
2.2.a The forest owner or manager allows the exercise of ***tenure*** and ***use rights*** allowable by law or regulation.	C	Evidence of compliance to public access includes field observation of road and trail traffic, deer stands, and other infrastructure for recreation. Interviews with staff indicate a high level of awareness of public access rights and restrictions, rights-of-way, and other use rights. Committee members that observed the audit included representatives of recreational user groups.
2.2.b In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.	C	Counties hold public meetings on planned management activities. Many counties also have a Citizen Advisory Committee that includes representatives of different interests, including recreational user groups and other use rights holders. Where tribal resources or rights exist, each county holds consultations with tribes during the management planning process. Interviews with Jackson and Clark County forest managers indicate that these consultations occur at least twice a year.
2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	C	
2.3.a If ***disputes*** arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.	C	Refer to document titled WCFP FSC data request summary – C2.3 for a summary of incidents on each FMU. County Forest Administrators can provide land use agreements and summarize any disputes. Register of Deeds maintains any recorded agreements.
2.3.b The forest owner or manager documents any significant disputes over tenure and use rights.	C	Only one major dispute was reported among the 19 certified FMUs. In Iron County, lawsuits were threatened by a local tribe attempting to live on

		county forest that has claimed to have treaty rights that allowed them to do this. Local law enforcement and other relevant agencies have been involved in resolving this dispute, which is ongoing. A private landowner adjacent to the FMU has allowed the tribal members to stay. Cleanup issues remain.
Princple #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	NA	There are no tribally owned or managed FMUs within the scope of the certificate.
3.1.a Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.	NA	
3.1.b The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.	NA	
3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	C	
3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	County Board meetings and forestry committee meetings in which policies for resource management and work plans are set allow for public input, including Native American organizations. The DNR and Counties also maintain relationships with local Tribes and solicit input as needed as confirmed through interviews with the FME. DNR staff maintain information on tribes in the FMP: • Tribal Map of WI (8-2013) • Tribal Contact List (7-2014) WCFP sent letters to 11 Tribes (as well as Great Lakes Indian Fish and Wildlife Commission

		GLFWC) deemed to be potentially interested in management of the County Forests as part of the CLUP writing process in 2004-2006. The letters provided contact information for the County Administrators, described the County Forests, the County Forest planning process, and invited participation on identifying archaeological and cultural resources. Thus, all County Forests have met the minimum requirement for this Indicator. Additionally, all County Forests have participated in cultural resources training that included at least one tribal representative. In 2014, auditors confirmed that Jackson, Clark, Eau Claire, and Juneau Counties have varying levels of contact with the representatives of the Ho-Chunk Nation. In general, the Ho-Chunk Nation prefers to maintain the confidentiality of special sites and will inform county staff of areas to avoid or even ask to identify leave trees. For management activities being conducted within the ceded territory over which the tribe has use and access rights, Jackson County forest managers meet with representatives at least twice a year to review any measures necessary to protect tribal rights. In Juneau County, while not within the ceded area, tribal representatives have met with staff on proposed harvest sites to devise measures to protect burial mounds. Juneau is currently exploring an opportunity with a tribal member to collect some undesirable trees that are hindering regeneration objectives for hard-mast species such as oak.
3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	WCFP covers common measures taken to protect tribal resources in the CLUP – Ch 200. The Timber Sale Cutting Notice Form 2460 is also used to document any field-level precautions and measures to take. Forest management occurs on an ongoing basis. County Board meetings and forestry committee

		meetings in which policies for resource management and work plans are set allow for public input, including Native American organizations. See 3.2.a in regard to the Ho-Chunk Nation. The DNR also maintains relationships with local Tribes. WI DNR uses a variety of mechanisms to consult with the six federally recognized Chippewa tribes regarding forest management and off-reservation hunting rights. These mechanisms include designating individual tribal liaisons to consult with each Chippewa tribes on forestry related topics including County Forests, specific inclusion and communications with Great Lakes Indian Fish and Wildlife Commission on important forestry management protocols (e.g., biomass harvest guidelines, BMPs for water quality, Invasive Species BMPs, Silviculture Handbook, and Forest Management Guidelines). In addition, all Chippewa tribes were consulted on the Division of Forestry's "Strategic Direction". Finally, Chippewa tribes participate in the following DNR management committees that relate to forest and wildlife management: A) The Wild Plant Management and Policy Committee (WPMPC) B) Wildlife Management Committees for: (1) Bear (2) Deer (3) Elk (4) Furbearer (5) Invasives (6) Marten Advisory (7) Migratory Game Bird (7) Pheasant (8) Prairie Grouse (9) Ruffed Grouse / Woodcock (10) Turkey (11) Upland Small Game (Sub-committee of

		Pheasant Committee) (12) Wildlife Health (13) Wolf
3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.	C	See evidence presented in 3.2.a. In addition. WCFA recently joined the Wild Rice Advisory Committee to represent the County Forest system. This committee has members from several tribes on it. WCFA hopes that its participation in this committee improves its and the counties' relationship with the tribes. Notes from WCFA's representative at the meeting (8/11/14) were provided. 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). All Counties audited in 2014 were found to follow these procedures. Jackson County has the most regular contact with the Ho-Chunk Nation (twice per year).
3.3.b In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).	C	See evidence presented in 3.2.a and 3.2.b.
3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NA	No protected traditional knowledge or intellectual property is being used in the FME's forest management system.
3.4.a The forest owner or manager identifies whether ***traditional knowledge*** in forest management is being used.	NA	
3.4.b When traditional knowledge is used, written	NA	

protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.		
3.4.c The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.	NA	
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	C	
4.1.a Employee compensation and hiring practices meet or exceed the prevailing ***local*** norms within the forestry industry.	C	Employment opportunities at DNR and County Forests are non-discriminatory, including with respect to place of residence. State hiring processes adhere to strict policies for compliance to equal opportunity, selecting interview candidates, and other measures to ensure fair hiring practices. More information is available at http://oser.state.wi.us/index.asp.
4.1.b Forest work is offered in ways that create high quality job opportunities for employees.	C	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. Though WCFP employee salaries are typically less than industry, there are other benefits that help offset the differences, such as training. 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. County employees interviewed during the 2014 audit expressed high job satisfaction and ample opportunities for training, including through DNR-sponsored programs.
4.1.c Forest workers are provided with fair wages.	C	A description of how salaries and benefits are determined is available at http://oser.state.wi.us/index.asp, including

		through adherence to federal and state laws for exempt and non-exempt employees.
4.1.d Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.	C	Refer to http://oser.state.wi.us/index.asp for information on hiring practices. See also 4.1.a and 4.1.c. Contracts include stipulations to adhere to federal and state laws, including equal opportunity and non-discrimination.
4.1.e The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.	C	WCFP distributes bid prospectuses to a comprehensive list of potential bidders, and intentionally varies the sizes of timber sales to allow access to a range of local companies.
4.1.f Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.	C	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. DNR Liaisons and County Forest staff support a large number and wide range of environmental education activities. For example, DNR staff attend public meetings related to the management of County Forests and also provide educational opportunities to the public, such as Project WILD (http://dnr.wi.gov/org/caer/ce/eek/teacher/calendar.htm). A sample presentation on urban forestry in partnership between DNR and local sports organizations was also provided as evidence. Wisconsin County Forests Association (WCFA), which works together with DNR on the County Forest program, also provided SCS with a letter (August 6, 2014) detailing its outreach and educational activities with industry, interested citizens, and other groups. WCFA also provided a draft agenda for a sustainable forestry and wood products educational retreat for educators to be held August 17-18, 2014.
4.1.g The forest owner or manager participates in local economic development and/or civic activities,	C	See also 4.1.f. Annual budgets for forest access roads, trails, campsites, and other infrastructure

based on scale of operation and where such opportunities are available.		are documented in each County's AWP. What infrastructure projects were completed and final costs are documented in Annual Reports. DNR offers several training events that are open to private consultants and forest industry professionals (e.g., http://dnr.wi.gov/topic/ForestLandowners/cuttingNoticeTraining.html). DNR conducted an analysis of forest certification's economic impacts (Review of Wisconsin's Investment in Forest Certification: Expenditures and Impacts 2005 to 2012; by the Council on Forestry Steering Committee (11/13/2013)), which is of use to itself and industry associates. WCFA documents the impacts of the WCFP on its website under the "Economic" tab (http://www.wisconsincountyforests.com/; viewed 8/14/14), and a myriad of other educational and civic activities put on by WCFA and WCFP participants (individual county forests and WDNR).
4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.		
4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	Refer to document titled WCFP FSC data request summary – C4.2 for a summary of information on each FMU. Refer also to the following FMP components: • CLUP – Chs 500 & 900; • County Forest timber sale contract; and • WDNR Timber Sale Handbook. DNR provides health and worker's compensation insurance for employees, as well as offers training on different health & safety topics. County staff interviewed stated that they had attended FISTA trainings, prescribed fire courses, pesticide applicator's license courses, and on-the-job guidance from supervisors on safety related

		issues.
4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	NC	Contracts reference applicable laws and regulations (e.g., Jackson Timber Sale contract and Eau Claire Timber Sale contract), including OSHA requirements. No major health or safety issues were uncovered in the field or during interviews with contractors. Firewood and moss harvesting permits do not include safety requirements. Evidence: permits reviewed for Jackson (moss), Clark (firewood), and Juneau (moss). See **Minor CAR 2014.1.**
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.		All County Forests have training safety programs for staff, including safety meetings held at least annually. Safety records, training reports, and certificates are maintained at each county office. All timber sale contracts include safety requirements and in most counties logger contractors are required to have FISTA training. Through interviews with loggers onsite, the audit team confirmed that qualifications have been met through experience and training.
4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).	C	
4.3.a Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.	C	Freedom of association is unambiguously guaranteed for all DNR and County employees. Right to organize is guaranteed by U.S. and State of Wisconsin Law For all employees of contractors, the standard contract requires the contractor to comply with all applicable labor laws; as such, freedom of association is ensured. More information is available at http://oser.state.wi.us/index.asp in regards to DNR and other State employees.
4.3.b The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.	C	For both County and DNR employees, there is a dispute resolution mechanism for its employees, both union and non-union employees. More information is available at http://oser.state.wi.us/index.asp.
4.4. Management planning and operations shall incorporate the results of evaluations of social	C	

impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.		
4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: • Archeological sites and sites of cultural, historical and community significance (on and off the FMU; • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. A summary is available to the CB.	C	Refer to County Forest Comprehensive Land Use Plan – Ch 300, County Forest annual work plans, County Forestry Committee meetings, WDNR Timber Sale and Public Forest Lands Handbooks, and Timber Sale Cutting Notice & Report (Form 2460).
4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.	C	County Forest Administrators respond to any stakeholder comments as they are received. No major issues other than those listed under other indicators surfaced in the last year. Refer to information on each county in WCFP FSC data request summary – C.4.4.
4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.	C	County board meetings and forestry committee meetings in which policies for resource management and work plans are set allow for public input. Adjacent land owners are contacted in cases when management activities occur near property boundaries or otherwise may affect use rights. Observed 10 foot buffer along property boundary in timber harvest in Juneau County. County Forest Administrators are available to the public for people to provide feedback, in this way they are constantly evaluating social impacts and incorporating them into management.
4.4.d For ***public forests,*** consultation shall include	C	Refer to 4.4.b and 4.4.c. The County Forest Law

the following components: 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.		establishes mechanisms for public participations in all planning processes. Annual work plans are open for public comment as advertised in local newspapers and on each County's website well before management activities take place. Appeals are dealt with prior to plans becoming finalized as to avoid any conflicts; however, the public may contact their elected county representative or present information during monthly public meetings to appeal decisions. All draft and final plans are made available in County offices and on each County's website. Specific data may be requested from county forest managers.
4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.	C	
4.5.a The forest owner or manager does not engage in negligent activities that cause damage to other people.	C	Through implementation of measures to protect property boundaries and ensure compliance to health & safety laws, WCFP avoids negligent actions. Any such cases would be handled through legal staff.
4.5.b The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.	C	WCFP must provide mechanisms for public input on forest management activities per the law that established the program. Refer to C1.5, C2.3, and C4.4. WCFP maintains communications with the local public and tribes regarding resources of others that may be impacted during management.

4.5.c Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.	C	Through interviews with WCFP staff, the audit team confirmed that there have been no recent cases of substantiated damage to adjacent lands or permitted use rights.
Principle #5: Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	C	
5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.	C	Annual budgets for forest access roads, trails, campsites, and other infrastructure are documented in each County's AWP. What infrastructure projects were completed and final costs are documented in Annual Reports.
5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	C	While staff levels have fluctuated during the recession (2007-2012), as evidenced in harvest records for the same time period WCFP has been able to maintain a level of harvesting that is within the AAC, and that provides income for operations and counties.
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	C	
5.2.a Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.	C	Through an examination of harvest contracts and interviews with WCFP employees, all loggers and mills are local. Most harvested materials are made into lumber and pulp/ paper products locally. In Clark County, one harvest area was made into firewood units so that small operators could obtain firewood for personal use locally.
5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.	C	Wisconsin has mills capable of using various grades of timber. WCFP lands observed were promoting the development of higher quality stands of hardwood through TSI and shelterwood harvests. For lower grade products, pulp & paper, firewood, and biomass are options for most County lands. Examples of optimization

		were observed in pine thinnings through the use of processors so that varying grades of lumber could be obtained through better utilization.
5.2.c On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.	C	In Clark County, one harvest area was made into firewood units so that small operators could obtain firewood for personal use locally. Other small-sale areas are established within the WCFP program so that small businesses can bid competitively.
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	C	
5.3.a Management practices are employed to minimize the loss and/or waste of harvested forest products.	C	On pine thinnings, processors are used that allow for a high level of utilization while spreading slash evenly over the harvest site. Other types of harvests employ a combination of mechanized- and hand-felling that are extracted with skidders or forwarders to avoid damage to the residual stand and harvested materials.
5.3.b Harvest practices are managed to protect residual trees and other forest resources, including: • soil compaction, ***rutting*** and erosion are minimized; • residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; • damage to NTFPs is minimized during management activities; and • techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.	C	Loggers in most counties are required to have FISTA training, which includes training on measures to implement this indicator. No significant damage to the resources mentioned was observed. Examples of measure to avoid damage to soil and water resources includes winter logging in wetlands so that compaction is avoided.
5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	C	
5.4.a The forest owner or manager demonstrates knowledge of their operation's effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.	C	As confirmed through interviews, WCFP staff have a high level of knowledge of local uses for forest products and recreation. Through its partnership with WCFA, an economic analysis of the WCFP will occur soon so that a broader understanding is attained.

5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.	C	The WCFA Forest Practices study mentioned in 5.4.a will be used to identify areas there WCFP has opportunities to enhance to diversify its products or services offerings.
5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	C	
5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.	C	WCFP's mission includes opportunities for hunting, fishing, and other forms of recreation developed in cooperation with other public agencies and stakeholders. These are mentioned in Chapters 100, 200, 300, and 500 of each county's CLUP.
5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.	C	Evidence observed in the field includes ATV, snowmobile, and hiking trails, as well as observation of boat launches and camping facilities. Money from recreation permits is used to manage these resources.
5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	C	
5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan. The sustained yield harvest level calculation for each planning unit is based on: • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals;	C	Minor changes to annual allowable harvest rate occur each year when planning is conducted for each county forest. During planning, if harvest intervals or early or late constraints are changed, the calculated annual allowable harvest will change accordingly. Additionally, if harvest dates are updated on a large amount of the property the annual allowable harvest can also be impacted. Harvest rates established using area control methods. County Forestry Committees and County Boards develop budgets annually, during which annual allowed harvest acres are considered. CF administrators can provide any documentation of Department budgets that is requested. WisFIRS Reports 36A and 37A contain stumpage value for sales completed by year.

• silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.		
5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	C	33,414 (established sale acres CY13 – rpt. 301) vs. 42,801 (long term goal – 15 year avg.-PY13 – rpt. 303). Refer to WisFIRS Reports 201, 301, and 303 and Reports 36 A and 37A. WCFP records show that timber harvests remain within the AAH on average over the past 10 years (examined records for Clark and Juneau Counties, and summary data for each county).
5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	C	WCFP uses standard harvest scheduling established in WisFIRS for each stand type. Future entries are based on species composition, stocking, and past management. In Clark County, a demonstration of how this system works was provided to the audit team to show how aspen stands are being managed given the high number of areas with similar age classes. A combination of moving harvests forward and delaying harvest is being used to ensure a more balanced age class distribution over time.
5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	C	Currently, the only significant commercial operations of NTFPs occur on counties with Sphagnum moss resources. Harvest areas and intervals are set according to data from past years that shows how quickly the resource can recover. Contracts were observed for Clark and Juneau Counties.
Principle #6: Forest management shall conserve biological diversity and its associated values, water resources,		

soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.		
6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	C	
6.1.a Using the results of ***credible scientific analysis, best available information*** (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes: 1) Forest community types and development, size class and/or successional stages, and associated ***natural disturbance regimes***; 2) ***Rare, Threatened and Endangered (RTE) species*** and ***rare ecological communities*** (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) ***Soil resources***; and 6) ***Historic conditions*** on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.	C	These topics are covered in Chapter 100 of each County's CLUP, such as soil types, communities, biodiversity (including RTE species) disturbance regimes, water resources, and historic conditions. Community types and natural disturbance regimes common to Wisconsin are described the Silvicultural Manual. Counties also use supplemental information such as soil maps, LiDAR data for wetland locations, NHI data, wildlife action plan, and DNR manuals.
6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a. The assessment must incorporate the ***best available information***, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams,	C	Impacts to these resources are evaluated when completing 2460 forms for each timber harvest. The forms are comprehensive and include the results of the evaluation of these resources. Each County's CLUP also contains general information on common impacts.

habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.		
6.1.c Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.	C	The 2460 forms are used to document the harvest or management prescriptions. Counties use DNR BMP and Silvicultural Manuals to develop prescriptions to avoid negative impacts and meet ecological objectives of management. The Kotar habitat classification system is used to assist in making ecological-based harvest plans.
6.1.d On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.	C	Each timber sale is posted in a local newspaper and many are posted on county websites prior to the sale (typically at least 30 days). Management plans that include broad overviews of 6.1.a are available online and by request. The public is involved in preparing these drafts. Annual Work Plans are made available to the public prior to finalization and any relevant comments received are responded to during public meetings. All final management planning documents are available to the public in public offices, upon request, and many are also posted on county websites. Information from 2460 forms may be available upon request during draft form and upon finalization, excluding confidential portions on RTE species, sensitive habitats, and archaeological sites.
6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management	C	The Wisconsin Natural Heritage Inventory (NHI) is consulted prior to forest management activities. Foresters work in consultation with Wildlife and Endangered Resources staff to address any

activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.		occurrences. Forestry, Wildlife and ER staff often conduct additional site surveys for species if the NHI database indicates the need. The NHI system allows for reporting of any additional occurrences by a variety of staff. Impacts to RTE species are documented in timber sale files and the timber sale cutting notice (Form 2460). County staff cooperate and collaborate with Wisconsin DNR staff on upcoming timber sales during the Annual Partnership and/or work planning Meetings and also receive additional site specific input on RTE species detection and management on a case by case basis, when needed. One significant change in 2014 is that County staff are more consistently filling out the section of the 2460 form for RTE species detection using the NHI database.
6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. ***Conservation zones*** and/or ***protected areas*** are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.	C	Management activities that impact RTE species and habitats occur regularly. Management activities are planned and carried out with consultation from wildlife and/or endangered resources staff and using species specific guidelines applied to local conditions to mitigate potential impact to RTE species and habitats. DNR has guidance for RTE species in terms of nest buffer areas and timing of harvest. In 2014, specific management measures for Karner Blue butterfly habitat was being employed in Jackson, Clark, Eau Claire, and Juneau Counties. This species requires early successional habitat and a certain density of a local lupine species. These activities were being carried out in accordance to a regional Habitat Conservation Plan (HCP).
6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.	C	Refer to HCP for Karner Blue butterfly. In other Counties, there is an HCP for Kirtland's warbler and plans for other RTE species, such as the American marten. Counties can receive funding of five cents per acre for wildlife habitat

		improvement, which can be used for game or non-game species.
6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	County staff gate roads and use other measures to control access to sensitive sites and habitat. Local law enforcement may also conduct patrols to control access. No collecting of RTE species is known to occur on the County lands visited in 2014.
6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	
6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented ***successional*** stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	Assessments of under-represented, naturally occurring successional stages would occur during comprehensive land use planning processes. Specific property goals for management of these areas would be described in the comprehensive plan and/or in annual work plans. Counties visited in 2014, active management in barrens (Jack pine and other early successional communities) was evidence of maintaining an under-represented successional stage. Where aspen across the landscape is in similar age classes, counties are attempting to spread out age classes among these areas through timing of harvest. In Chippewa County, there are some areas that are being managed for late seral conditions in a mixed hardwood stand using Big Tree Silvicultural guidelines
6.3.a.2 When a ***rare ecological community*** is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, ***conservation zones*** and/or ***protected areas*** are established where warranted.	C	In all counties, wetlands and around State Natural Areas (SNAs) buffers are identified on the ground to avoid equipment entry into these areas. In certain wetlands, winter harvesting is allowed and can be used to favor early successional wetland species and to maintain species composition over time.

6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all ***Type 1*** and ***Type 2 old growth***. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate). Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g). On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate). On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where: 1. Old growth forests comprise a significant portion of the tribal ownership.	C	Relict old growth stands (Type 1) are typed as reserved - no management. On any managed old-growth stand – any forest management is conducted primarily to maintain or enhance old growth characteristics. No changes to this topic since last audit. Refer to document titled WCFP FSC data request summary – C.6.3 Counties visited in 2014 did not have any Old Growth; most lands inherited by counties were cutover former agricultural lands.

2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected.		
6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.	C	DNR wildlife biologists work with liaison foresters and county forest administrators to plan and carry out projects for wildlife habitat improvement. Funding of $.05/ acre is provided to county forests by the DNR to perform habitat improvement work. Additionally, individual biologists, foresters, and county forest administrators pursue additional projects for the benefit of wildlife at a local level. Some recent examples of efforts to benefit wildlife include: Young Forest Initiative, barrens restoration and management, grouse/woodcock habitat, turkey habitat, etc. Projects are often conducted in partnership with other groups including ruffed grouse society, wild turkey federation, USFWS, etc. Habitat classification and training has improved, which should allow for County foresters to better understand and document the potential for ecological habitat on different sites.
6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent ***aquatic habitats***; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and,	C	Forest management activities regularly occur near riparian areas. Wisconsin BMPs for Water Quality are followed when conducting management near riparian areas. BMP, soil disturbance, and ephemeral pond monitoring projects are conducted on county forest lands by the DNR forest hydrologist. Sites visited in 2014 showed good adherence to water quality BMPs.

e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.		
Stand-scale Indicators **6.3.d** Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.	C	The long term silvicultural goal is dictated by the habitat classification. County foresters generally strive to maintain current stand plant species composition with their management prescriptions. The exception to this is the targeted harvest of mature ash to thwart impending emerald ash borer invasion. Ash was still a common species found regenerating on many sites visited in 2014.
6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. ***Native species*** suited to the site are normally selected for regeneration.	C	Seed sources predominantly come from areas around the state's two nurseries (WI Rapids, Boscobel). Some counties send local seed sources to out-of-state nurseries to be container grown. Refer to document titled WCFP FSC data request summary – C.6.3. Some containerized stock red pine seed source is from Ontario, but is similar to local provenance and has been well-documented through research. Jack pine seeds are from known local sources and usually come from local nurseries as confirmed through multiple interviews with County forest staff.
6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, ***snags***, and well-distributed coarse down and dead woody material. ***Legacy trees*** where present are not harvested; and b) vertical and horizontal complexity. Trees selected for ***retention*** are generally representative of the dominant species found on the site.	C	Sites visited by the 2014 audit team showed generally good compliance with this indicator. We saw one site in Jackson County with some nice leave islands in a red pine overstory removal harvest. The 2460 describes which species to retain on site and additional effort is completed to mark wildlife trees for retention. Clark County has started to document legacy tree locations in WisFIRS. Retention of non-oak species in the overstory was observed in oak shelterwood and overstory removal areas such as red pine and islands of shade-tolerant species. All harvests observed included elements of retention for snags and directional complexity for wildlife movement. For even-aged red pine stands at final harvest,

		auditors observed un-entered retention islands with species that were generally representative of the dominant species found on the site (red pine, oak, maples, etc.). On aspen stands, individual tree and clumped retention observed consisted of oak and pine species, with little to no aspen retained. County forest managers stated that the reason for little to no retention of aspen within clearcut areas was due to forest health concerns such as conks (i.e., fungus) and insect pests. See **OBS 2014.2.**
6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when ***even-aged systems*** are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region. In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.	C	~ 16,300 acres received even-aged harvest in CY 2013 (data export WisFIRS – even-aged acres). When even-aged harvests are conducted green tree retention guidelines, biomass harvesting and coarse woody debris guidelines are all followed. Single trees and clumps of trees were observed on even-aged harvests in aspen, red pine, and oak stands. See **OBS 2014.2.**
6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan: 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the ***best available***	NA	There are no restrictions on even-aged management in the Lake States.

information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.		
6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control ***invasive species***, including: 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.	C	Prevention- Counties employ prevention practices consistent with risks posed locally by invasive species. Refer to document titled WCFP FSC data request summary - C.6.9. Most Counties have invasive species plans or are in the process of completing them. In January of 2014, a final report was issued as part of a baseline survey for invasive species which occurred in 2012 and 2013. The survey included selected sites in seven county forests in northern Wisconsin which were surveyed for a targeted list of terrestrial invasive plant species.
6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	Records for County Forests in particular are not readily available centrally, but these numbers are statewide: The following numbers are statewide 2014 calendar year so far: http://dnr.wi.gov/topic/ForestFire/report.asp Prescribed burns – 495 for around 26,760 ac Wildfires – 510 for 3,579 acres. The audit team observed planned use of prescribed fire in Juneau County for restoration of a Jack pine stand, and evidence of past use in

		oak shelterwoods/ prairies in Clark and Jackson Counties.
6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.	C	
6.4.a The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the ***landscape*** (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) ***GAP analyses***; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups. For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.	C	The RSA assessment was completed by Wisconsin DNR, which conducted an ecosystem-wide assessment for the entire state followed by a gap analysis. WDNR identified potential RSA areas via aerial photos and then ground-truthed the sites.
6.4.b Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes. Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.	C	WDNR recommended potential RSAs to County Forests. Nearly all recommended RSAs were classified as RSAs; however, the Counties refined the on-the-ground analysis by identifying RSA boundaries. RSAs include SNAs and some HCVFs that overlap with RSAs.
6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: a) harvesting activities only where they are necessary to restore or create conditions to	C	Barrens, such as the Bauer Brockway Barrens in Jackson County, are managed through fire and management activities designed to act as a surrogate for fire when it cannot be used. The SNA website outlines activities that are permitted or recommended to maintain them, including

meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.		timber harvests when these are compatible with management objectives.
6.4.d The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.	C	NHI data is continually updated with new information, which is then used to classify any new SNAs as indicated by the size and scope of the new finding.
6.4.e Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	C	
6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	C	
6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	WCFP uses State of Wisconsin BMP manuals (Wisconsin's Forestry Best Management Practices for Water Quality, 2010). See also County forest comprehensive land use plan Ch 800, WDNR Timber Sale Handbook, WDNR Silviculture and Aesthetics handbook, Web and Print Soil Survey Information.
6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	C	All sites examined had properly implemented BMPs, with few exceptions, such as where some tree tops were allowed to fall just within a wetland (Juneau, Tract 6-11). However, removal of tops would lead to more damage and impact was relatively low. These few tops may also be consistent with the impacts of a natural tree fall into a wetland.
6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid	C	Wisconsin BMPs form the base for conformance to this indicator. The 2014 audit team saw good compliance to BMPs during the audit. The DNR also has implemented new guidance for whole

erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate.		tree harvesting in biomass harvesting as research has shown that enough crowns break off during skidding to distribute nutrients over the site.
6.5.d The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes: • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream		Counties follow Wisconsin BMPs which address many of these issues. In 2014 we saw that the Counties were closing access to roads with gates and berms. Unneeded roads were closed and seeded when appropriate. The harvest areas were designed to minimize road infrastructure and crossing of streams was minimized. In one instance, we saw an appropriately rehabilitated stream crossing with no evidence of sedimentation. Trails were seeded in a timely manner to prevent soil erosion. Jackson County staff were using tree drops along an ATV trail to prevent vehicles from entering wet and rutted areas along the trail.

passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated.		
6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written ***Streamside Management Zone*** (SMZ) ***buffer*** management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers. In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.	C	Riparian Management Zones (RMZs) are described in Chapter 7 of the BMP manual. Chapter 8 deals with wetlands. The *recommended* RMZ widths for lakes and streams are: • RMZ = 100 feet o Lakes o Designated trout streams (regardless of width) o Streams 3 feet wide and wider • RMZ = 35 feet o Streams less than 3 feet wide o Streams less than 1 foot wide Wetlands must have filter strips of at least 15 feet in width. The BMP manual includes examples of using RMZ width for common situations, such as even-aged aspen harvests. Harvest is permitted within RMZs, but typically WCFP foresters retain higher basal areas within RMZs.
6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager	NA	No departures from stated minimums were detected during the field audit or reported by WCFP staff. Since RMZ widths are recommended, technically no variance is required for altering widths.

develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.		
6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of ***aquatic habitat.*** Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.	C	The BMP manual covers crossings in detail with specific examples. The specifications are in line with this indicator. Field sites visited in 2014 showed good adherence to BMPs. No impediments to aquatic organisms were observed. Areas of temporary crossings were observed for wetlands. In these areas, mats are typically used to cross sensitive areas. These are removed after harvest and hydrology is not altered.
6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	C	BMPs are designed with compatible multiple uses in mind. Recreational activities vary depending on the county.
6.5.h Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.	NA	No grazing with domesticated animals is permitted on County Lands.
6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.	C	
6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001	C	All chemicals reported during 2014 were not on the list cited. The 2,4D formulation reported for

EN FSC Pesticides policy 2005 and associated documents).		Amine is 2,4-Dichloro-phenoxyacetic acid, which is not on the highly hazardous list (FSC-GUI-30-001 Pesticide Policy: Guidance on Implementation, 2007).
6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.	C	Herbicides are primarily used to control invasive species, but are also employed in site preparation for sites that need mineral soil exposure or to liberate shade intolerant species from competition. In the case of invasive species, herbicides are the most effective method, and result in lower environmental and social costs due to avoidance of ground disturbance that could create conditions for invasive species regeneration. In the case of site prep for replanting Red pine or other shade-intolerant species, the use of broadcast herbicide requires less tilling or disking to expose mineral soil (as observed in Jackson and Clark Counties). Trained and licensed County Forest staff apply most herbicides, although aerial prescriptions may be contracted to third parties. WDNR's BMPs for invasive species and water quality are adhered to, which include instructions for following label recommendations and choosing least damaging methods of application. Individual counties may have chemical use strategies included in the CLUP or, as in the case of Clark County, a supplemental invasive species management plan that includes more detailed chemical and non-chemical strategies. Plans contain examples of situations when non-chemical options may be more appropriate or effective.
6.6.c Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type	C	Aerial application is typically used only over large treatment areas where extensive site prep is require to establish shade intolerant species such as Jack pine or Red pine. Retention islands (e.g., Jackson County, Clark County) are included on maps so that aerial applicators know where not to apply the treatment. Ground treatments may

of chemicals required.		be used in site prep and are usually applied using machinery or backpack sprayers. Spot treatments are applied with backpack sprayers to control invasive species.
6.6.d Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.	C	Observed chemical applicator's licenses for staff of Jackson, Chippewa, and Eau Claire. Staff in Juneau had expired licenses, but were not conducting any applications in the near future and are aware of the need for recertification. Prescriptions are recorded in WisFIRS and Form 2460) and also serve as a record of application. A written prescription was reviewed for Clark County. It contained a map, requirement to wear PPE and adhere to chemical label safety and dosage requirements. Environmental precautions and site specific hazards cited included wind and sensitive features.
6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.	C	Pesticide use records are maintained by County Forest Administrators and are entered in WisFIRS. Prescriptions and evaluations of prescriptions are maintained in County offices. Records of pest occurrence are usually taken as part of field recon (inventory). Incidences of exposure are recorded per labor requirements cited in Principle 1 and Criterion 4.1. Jackson and Clark counties demonstrated evidence of adaptive management in mechanical disking and tilling to ensure than minimal soil exposure necessary to establish Red pine or Jack pine would not cause regeneration of any strong competitors. A high density of competitors could require spot herbicide treatments in the future.
6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C	
6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	C	Loggers, County staff, and WDNR staff interviewed stated that FISTA training includes procedures for using spill kits. Spill kits were

		located at landing areas near transportation vehicles.
6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	No spills were reported on any of the County properties visited in 2014. Logging equipment observed was in working conditions and with no evidence of persistent leaks.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	Fuels and other hazardous materials were stored in landing areas observed on active logging sites, which were well-away from sensitive areas.
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	C	
6.8.a Use of ***biological control agents*** are used only as part of a pest management strategy for the control of invasive plants, ***pathogens***, insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.	C	Biological control agents are occasionally recommended for use in the control of invasive plants and insects per State and Federal regulations. County staff do not have the authority to release them. Only WDNR or other state employees that have been trained in application methods release them (primarily insects or aerial bacterial sprays). Applications are regulated by the Wisconsin Department of Agriculture, Transportation, and Consumer Protection. No recent use of biological control agents was reported on Counties visited.
6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.	C	Only WDNR or other state employees that have been trained in application methods release them (primarily insects or aerial bacterial sprays).
6.8.c If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and	C	Only WDNR or other state employees that have been trained in application methods release them (primarily insects or aerial bacterial sprays). Applications are regulated by the Wisconsin Department of Agriculture, Transportation, and

implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.		Consumer Protection. No recent use of biological control agents was reported on Counties visited.
6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose	C	No use of GMOs was reported by County staff. All seed sources from nurseries are documented and traceable to the provenance or collection area. Most Counties rely on natural regeneration.
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a The use of ***exotic species*** is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	Exotic species are not used on the FMUs for commercial or management purposes other than a WDNR seed mix used in erosion control. WDNR did an analysis of the risk of using this seed mix as part of its FSC audit several years ago. County staff follow the guidelines from this evaluation, which indicated low risk of invasiveness and low risk of establishment of a seed bank.
6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	See 6.9.a
6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	See 6.9.a.
6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: **a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.**	C	
6.10.a Forest *conversion* to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be	C	Documentation of any forests to non-forest use is maintained by County Forest Administrators. WCFP consists of all natural forests (including planted natural forests) and no FSC plantations. Counties have not conducted any conversion of

conformed with for conversion to be allowed).		forestland to non-forest use. Currently, a parking lot is planned in Juneau County in a newly acquired parcel, but will be installed over an area that was cleared by the previous owner of the property. This area may include the removal of a small number of trees; however, the removal of old housing structures from the site will allow for the recovery of some forest.
6.10.b Forest *conversion* to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	No conversion has taken place. For the small parking lot in Juneau County, the area does not meet any of the County's or WDNR's HCV types. The acquisition area is undergoing recon (forest inventory) and may be subject to documented permitting to analyze environmental impacts.
6.10.c Forest *conversion* to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).	C	The planned conversion in Juneau County will allow for non-motorized recreation in a forest that has been harvested several times over the years. Recreation will allow the forest to grow while providing funding for maintenance and access for monitoring. Additionally, the property includes a four-mile long riparian area that will be protected.
6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.	C	No conversion of natural/semi-natural stands to non-forest use was not reported or observed during the 2014 assessment.
6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)	C	The property in Juneau County, has a land management plan that was developed in cooperation with The Conservation Fund, which helped acquire the property. A combination of recreation, forest management, and protected areas is planned for the site. The development of some areas of later successional stands through passive management, the management of oak-hickory, and riparian lowland hardwood forests with harvests is compatible with achieving landscape biodiversity.
6.10.f Areas converted to *non-forest use* for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate	NA	No OGM rights were reported to be in exercise currently. Counties usually seek to acquire subsurface rights when acquiring new lands. OGM rights may expire in many areas when the

holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.		rights holder does not exercise the rights within 20 years.
Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.		
7.1. The management plan and supporting documents shall provide: **a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.** **b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.** **b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.**		WCFP employs several documents to guide management. There are three main levels of documentation that comprise the Forest Management Plan (FMP): DNR liaison: • WDNR Public Forest Lands Handbook 2460.5 & WDNR Timber Sale Handbook 2461 • Wisconsin Forest Management Guidelines (WFMG) • BMP Manuals • Cutting Notice & Report – Form 2460 Wisconsin County Forests Association (WCFA) • Strategic Plan (2012) • Documentation and training programs to support the Strategic Plan Individual Counties: • Comprehensive Land Use Plans (CLUP or county plan) • Annual Work Plans (AWP) • Partnership meeting minutes • Timber Sale Contracts
7.1.a The management plan identifies the	C	County-level FMPs include chapters on statutory authority and ownership. County-level FMPs cite

ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.		Wisconsin Statutes 28.10 and 28.11, the legislation that establishes the authority for establishment of, administration of, and management of county forests. WDNR Public Forest Lands Handbook 2460.5 provides a comprehensive overview of these statutes.
7.1.b The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).	C	WCFP management plans describe the history of the forest in each county, the natural features of the forest, and the relevant biological communities and associated resources (Chapter 130). Current forest types and age classes are presented in Chapter 800 on integrated resource management.
7.1.c The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.	C	WCFP management plans are complemented by the Wisconsin Forest Management Guidelines (WFMG), published by DNR and revised in 2011. This document presents an excellent history of forest conditions and natural disturbance regimes. Objectives are clearly presented in WCFP plans, and future conditions and activities are presented in WisFIRS models, AWPs, and Planning Meeting Minutes. There is some variation among plans in the presentation of desired future conditions.
7.1.d The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.	C	WCFP management plans describe the landscape of each county in Chapter 100, and are complemented by a narrative (Form 2460) prepared for all timber sales. To varying degrees, examples of Form 2460 examined had relevant descriptions of the surrounding landscape. Chapter 500 also includes reference to landscape management and habitat elements.
7.1.e The management plan includes a description of the following resources and outlines activities to conserve and/or protect: • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9);	C	WCFP plans include all of the elements listed in this indicator, particularly in Chapters 100, 500, and 600. Form 2460 and revised appendices of the plans also contain lists of RTE species. Each plan reviewed clearly identified HCVF (Chapter 600), protected and managed in cooperation with the State Natural Areas Program.

• Other special management areas.		
7.1.f If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).	C	Chapter 800 (830.3) of county plans includes lists and management recommendations for invasive species. This is strongly supplemented by an Invasive Species BMP Manual prepared by the Wisconsin Council on Forestry. Invasive species are also addressed on Form 2460, prior to timber sales.
7.1.g The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).	C	Chapter 600 (610) of county plans addresses control of forest pests and pathogens. The WDNR Public Forest Lands Handbook 2460.5 contains guidance on insects and diseases, with particular emphasis on how to use WisFIRS to develop management options.
7.1.h If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.	C	County forests use chemicals sparingly, especially for silviculture, and county management plans mostly address applicable laws and regulations on their use. Chapter 600 (610) includes an integrated pest management program. Chapter 14 in the WFMG addresses pesticide use. But more importantly, a specific plan is required for each application, approved by the County Forest Administrator and detailed in either on Form 2460 or a separate chemical use form.
7.1.i If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.	C	Similar to chemical use, county plans include general reference to biological controls, if any, in Chapter 600. Again, a specific plan would be approved, likely requiring and environmental assessment. As an example, the Chippewa County plan includes reference to biological control options for Gypsy moth.
7.1.j The management plan incorporates the results of the evaluation of social impacts, including: • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including	C	Social impacts are presented mostly in Chapters 100, 200, 300, and 500 of county plans, which include sections on treaty rights, cultural features, administration, training, ordinances, etc. Addition information is found in Chapter 700 (e.g., Roads, trails, public access), and appendices in Chapters 800 and 900. WCFA maintains information on economic impacts of the WCFP on its website, and is a part of the Wisconsin's Forest Practices Study (WFPS) to examine the impacts of Wisconsin's forestry practices. More importantly, WCFA is sponsoring a Forestry Practices Study that will examine the socioeconomic impacts of the WCFP (see http://www.wisconsinforestry.org/initiatives/curr

creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g).		ent/forestry-practices-study). WDNR has several other documents that lend support to this indicator and that are based on information obtained from the WCFP. For example, *Review of Wisconsin's Investment in Forest Certification: Expenditures and Impacts 2005 to 2012* by the Council on Forestry Steering Committee (11/13/2013) draws information directly from WCFP's certification program to assess the benefits and costs of certification.
7.1.k The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).	C	WCFP plans address the transportation network in Chapters 700 and 1000 (Needs), and in AWPs. BMP manuals provide description of common methods of maintaining forest roads and trails.
7.1.l The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.	C	General references are contained in Chapters 500 and 800 of county plans. The DNR Silviculture Handbook is the primary reference for this element of the plan. Specific silviculture plans are part of Form 2460 and discussed in AWPs.
7.1.m The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.	C	The degree to which harvest rate calculations were presented in Chapter 800 of county plans varies among counties, but the Public Lands Handbook is the primary reference for harvest rate calculations. Species selection for harvest is a product of annual updates from forest recon and the programming of the WisFIRS system.
7.1.n The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	C	Most of the required monitoring is part of the forest compartment reconnaissance (recon), described in detail in the WDNR Public Forest Lands Handbook 2460.5.
7.1.o The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.	C	All relevant maps are included in Chapters 800 and 900 of WCFP plans. Maps are also available through WisFIRS and GIS.
7.1.p The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.	C	Although there are general descriptions of harvesting equipment in WFMG, specific requirements for machinery or special provisions for harvesting are included in prescriptions for each harvest and described on Form 2460. Most harvesting on WCFP is done with processors and forwarders, generally considered to have minimal impacts on resources.
7.1.q Plans for harvesting and other significant site-	C	All elements of this indicator are addressed routinely in the harvest prescription and

disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.		narrative completed before advertising timber sales. This is a multi-disciplinary process, usually involving DNR personnel with expertise in wildlife, fisheries, water, cultural features, etc. See Form 2460 and the AWPs.
7.1.r The management plan describes the stakeholder consultation process.	C	Chapter 200 of WCFP plans describes elements of stakeholder consultation, but this is addressed more specifically by the state statutes requiring environmental assessments and public oversight of county plans.
7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	C	
7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.	C	County forest managers are directed to develop new comprehensive land use plans every 15 years by Wisconsin State Statute 28.11(5)(a), although the plans are living documents and updated frequently. AWPs follow the entry of new data from forest reconnaissance, and annual WisFIRS updates produce new 15-year harvest projections. In 2012-13, in review of OBS 2012.3, SCS confirmed that the collection of planning documents that guide management are updated on an as needed basis, in many cases at least every 10 years. Such documents include the Silvicultural Handbook, Public Forest Lands Handbook, 2460 Cutting Notices, Ecological Landscapes, and Annual Work Plans for each county. Assuming that these planning documents continue to play important roles in guiding management of WI's County Forests, the 15 year update schedule for the County Forest Comprehensive Land Use Plans is acceptable. In 2014, it was observed in Clark County that a pine thinning from 2009 was remarked as

		selection and overstory removal in order to sell the timber. The change in prescription is consistent with management objectives as retention areas and seed banks ensure that species found on the site are maintained. Winter harvest was used to reduce impacts to wetlands. No other examples of significant changes to management planning were observed.
7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	County staff communicated several types of training during interviews, for some of which records were made available (e.g., Chippewa County forest administrator and assistant forest administrator). Other staff reported FISTA, wetland delineation & restoration, invasive species, WisFIRS, NHI, and storm water control. County staff reported collaborative relationships with supervisors and receive feedback whenever necessary or when they have questions.
7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	The County forest comprehensive land use plans are posted on most County Forestry Department websites – which can be accessed via this link: http://www.wisconsincountyforests.com/administrators/administrators-contact. Plans are also available at publicly available county forest offices. Other components of the management plan are also available at http://dnr.wi.gov/topic/CountyForests/timber.html.
7.4.b Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the	C	Both draft and final plans are made available for public input. WCFP management plans, annual work plans, and annual reports are posted on county web pages in most counties, and are available in other formats upon request.

plans to ensure compliance with this Standard.		Monthly meetings with Forestry and Recreation Committees in each county are open to the public. (Note: all counties have such a committee, but committee names vary).
Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.		
8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	C	
8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.	C	In addition to the management planning documents cited in C7.1, WisFIRS provides a system for recording monitoring information per DNR-established protocols. Other elements of the monitoring system include field manuals for forest inventory (reconnaissance), and studies commissioned by DNR, the legislature or other bodies. Monitoring strategy is described WDNR Public Forest Lands Handbook Ch 100 and recorded in WisFIRS.
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	WisFIRS is a comprehensive system for guiding the reconnaissance and inventory of forest compartments as well as for scheduling harvest and other management options of stands. All of the elements listed in this indicator are included in compartment reconnaissance (WDNR Public Forest Lands Handbook 2460.5). Recon was completed in CY 2013 on 161,583 acres.
8.2.a.2 Significant, unanticipated removal or loss or	C	Data on any such losses would be gathered by a

increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.		special recon inventory and entered into WisFIRS before annual updates of harvest scheduling. Timber thefts reported under C1.5 were recorded per protocols for law enforcement.
8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	CY13 harvest: 634,309 cords equivalent (rpt. 37A – CY13- FSC only) as maintained in WisFIRS. Records are kept of harvested timber and then entered into WisFIRS before annual updates on harvest scheduling. Records for harvest of firewood and NTFPs are maintained, as well as for any products harvested by members of tribes. Harvest data from TimberBase 2013 are manually entered into WisFIRS for long-term tracking.
8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: 1) Rare, threatened and endangered species and/or their ***habitats***; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4).	C	Most of these data are collected and maintained by personnel with Bureaus of Wildlife and Endangered Resources. Results of such monitoring are made available to county forest managers during periodic meetings of interdisciplinary teams and/or during review of proposed management operations. Wildlife Surveys 2013-14: Nesting bird surveys, grouse transects, summer deer observations, winter track surveys, bear surveys and a variety of other wildlife and plant monitoring. Forest Health Monitoring which includes gypsy moth and EAB surveys. In January of 2014 a final report was issued as part of a baseline survey for invasive species which occurred in 2012 and 2013. The survey included selected sites in seven county forests in northern Wisconsin which were surveyed for a targeted list of terrestrial invasive plant species.
8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.	C	County and DNR foresters indicated that they visit active harvest operations several times a week; assessment forms are in writing and were inspected during the field audit (attached to timber sale documentation). BMP monitoring for water quality, soil disturbance monitoring, and vernal pond monitoring was reported by county

		foresters to the administrator in preparation for the 2014 audit.
8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	WCFP requires annual reports and annual work plans for each county. AWPs routinely include information on the system of forest roads and make annual requests for road improvements and maintenance. The Wisconsin's Forest Practices Study (WFPS) will include information on roads in its examination of the impacts of Wisconsin's forestry practices.
8.2.d.3 The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	See County Forest Comprehensive Land Use Plans Ch 500. Additional monitoring information is available through WCFA (http://www.wisconsincountyforests.com) and WDNR (http://dnr.wi.gov/topic/CountyForests/monitoring.html). WCFA is sponsoring a forestry practices study that is expected to cover the information required in this indicator for long-term socioeconomic impacts (http://www.wisconsinforestry.org/initiatives/current/forestry-practices-study).
8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.	C	Meeting minutes with the public and Citizen Advisory Council serve as a record of stakeholder interaction.
8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	Communication with tribal representatives is on-going, assuring that any opportunities for joint monitoring of cultural sites are made available to tribes. Jackson County staff review timber sales and other management areas with the Ho-Chunk Nation at least twice per year. The Ho-Chunk monitor these sites on their own as the County forests are open to the public.
8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	County Forestry Committees and County Boards develop budgets annually. WCFP administrators can provide any documentation of Department budgets that is requested. WisFIRS Reports 36 A and 37A contain stumpage value for sales completed by year. Quarterly and annual accomplishment reports show progress throughout the year for various

		work goals (timber sale establishment, reforestation, etc.). Timber sale inspections monitor at sale level. WisFRS can be used to generate reports on revenue from timber sales for a given time period.
8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	C	
8.3.a When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	County forests use a trip-ticket system for tracking FSC-certified products. Tickets have three parts. When a load leaves the landing, one part is deposited in a lockbox on site. When delivered to the mill, a second ticket is maintained by the mill, and the third is returned to the county, along with mill weight or tally. See COC indicators for FMEs.
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See 8.3.a and COC indicators for FMEs.
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	C	
8.4.a The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	C	Annual work plans detail current activities to be carried out, while annual reports include a review of implemented activities. AWPs are based on management objectives detailed in the CLUPs and field data available in WisFIRS for classified stands. Any stands that have not been harvested are included as part of the next year's annual allowable harvest or delayed until the stands are ready for harvest.
8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan	C	In 2014, significant deviations from management plans or guidelines were not reported. Monitoring results for site prep for red pine replanting has indicated that shallower disking or tilling can be used to establish seedlings that are free-to-grow within acceptable timeframes in Jackson and Clark Counties. Monitoring records

implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.		and field observations of staff in WisFIRS observed for Jackson, Clark, and Juneau Counties show that achieving regeneration of certain species of oak remains difficult, for which regular monitoring of current treatments is conducted. The results of scarification, burning, and seed burying methods are being evaluated to see which methods work best given site conditions and timing. Each County's CLUP references monitoring and monitoring results in Chapter 3000.
8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	C	
8.5.a While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	C	Annual reports and annual work plans present summaries of monitoring and are usually available on county web sites, or by request in offices. The public also is welcome to visit County Forest Administrator's offices anytime and request monitoring information. Additional monitoring information is available through WCFA (http://www.wisconsincountyforests.com) and WDNR (http://dnr.wi.gov/topic/CountyForests/monitoring.html).
Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach. **High Conservation Value Forests are those that possess one or more of the following attributes:** **a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance** **b) Forest areas that are in or contain rare, threatened or endangered ecosystems** **c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)** **d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).**		
9.1 Assessment to determine the presence of the	C	

attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.		
9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F. Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.	C	HCV assessment framework appears to not have been updated. Examples include Juneau and Clark Counties, which include descriptions of recreational areas, ruffed grouse habitat, and other exceptional resources that likely do not meet the definition of HCV according the FSC-US framework. Certain HCV types are provided when WCFP reports HCV areas to SCS, but types are not specified in management plans (e.g., Winx Flowage). Post-audit, WCFP conducted a root-cause analysis and discovered that some of these areas were lumped into the HCV area due to a reporting error. The error involved selecting more special management areas in the reporting of HCV acreage to SCS. While the scale of the issue is small and WCFP presented evidence of the most up-to-date HCV classification, further work may be necessary to determine the scope of any further misclassification or misunderstanding of HCVs within WCFP's management system. See **OBS 2014.3.**
9.1.b In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.	C	The HCVF assessment is done in consultation with Wisconsin DNR. In that assessment, many experts, community members and specialists are consulted during the process. Records are included in management plans, annual work plans, and county meeting minutes.
9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	This is available in the management plans (CLUP) for the Counties that were visited in 2014.
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	C	
9.2.a The forest owner or manager holds	C	Wisconsin DNR and other stakeholders are

consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.		consulted to determine HCVF locations and their attributes (see OBS 2014.3 above for an update on HCVF attributes). Records are included in management plans, annual work plans, and county meeting minutes.
9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	C	County Forest management planning documents regarding HCVF classification are open to public review through public meetings, County websites, and the Citizen Advisory Committee. Records are included in management plans, annual work plans, and county meeting minutes.
9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	C	
9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.	C	Each HCVF is identified in the Master Plan (CLUP) and a written description along with management objectives is provided.
9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	C	The Counties work with Wisconsin DNR to determine and to apply the appropriate management activities that should occur in each HCVF. These include methods to protect species habitat characteristics (e.g., nest sites) or to maintain rare habitats, such as by burning, as described in the CLUP and annual work plans.
9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	C	The Brockway Barrens cross state and county lands. Management is in cooperation with Jackson County, WDNR, and USFWS staff on this area. No other instances were observed during the 2014 assessment.
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	

9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	Periodic recon updating, targeted monitoring visits to some HCVFs, and over this summer a contracted biological survey team has been completing *relevé* plots across HCVFs to establish some baseline vegetation monitoring data. Included in the plots being established by the survey team is the Winx Flowage site. This will help monitor vegetation over time. WDNR monitors prairie and barrens areas. County staff monitor for invasive species.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	The biggest issues affecting HCVs involve invasive species. Counties regularly check these areas and report any increases in invasive species presence. Usually mechanical, hand-pulling or chemical treatment is used. No unusual increasing risks were noted in 2014.
Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.		
Through examination of species composition and management practices, it was determined that WCFP continues to meet the natural/semi-natural management definition due to its exclusive use of native forest species suitable to sites and disturbance regimes. Stand trajectories, even when species densities are altered through management, are established while keeping in mind retention strategies to maintain all species on site over time.		

Appendix 6 – Tracking, Tracing and Identification of Certified Products

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

REQUIREMENT	C/NC	COMMENT / CAR
1. Quality Management		
1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization's compliance with all applicable requirements of this standard.	C	The COC administrator is the certificate manager for the counties, who currently is Joseph Schwantes.
1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	

1.3 The FME shall define its forest gate(s) (check all that apply): *The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.*		**Stump** [X] *Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.* **On-site concentration yard** [ ] *Transfer of ownership of certified-product occurs at concentration yard under control of FME.* **Off-site Mill / Log Yard** [ ] *Transfer of ownership occurs when certified-product is unloaded at purchaser's facility.* **Auction house / Brokerage** [ ] *Transfer of ownership occurs at a government-run or private auction house / brokerage.* **Lump-sum sale / Per Unit / Pre-Paid Agreement** [X] *A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.* **Log landing** [X] *Transfer of ownership of certified-product occurs at landing / yarding areas.* [ ] **Other** *(Please describe):*
1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.	C	The legal transfer point is defined within each timber sale contract. For field-scaled sales (e.g., sample contract for Juneau County), specification that logs cannot be transferred prior to scaling is included in specific language. Transfer of ownership in those cases occurs either upon scaling or approval from County Forest Staff.
1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. *NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips / biomass originating from the FMU under evaluation.*	C	No processing occurs prior to legal transfer of ownership.
2. Product Control, Sales and Delivery		

2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).	C	Most harvested timber is transferred upon severance from the stump (stumpage sales) or prior to harvest (lump-sum sales). Haul tickets may be used in stumpage sales to track harvested materials once they leave the site, but ownership lies with the buyer upon severance. In lump-sum sales, the buyer is responsible for any COC requirements. For field-scaled sales, in which logs are scaled at the landing prior to transport, County staff scale each log and mark it with paint. This lets the buyer know that the item is OK to transport.
2.2 The FME shall maintain records of quantities / volumes of FSC-certified product(s).	C	County staff showed how TimberBase 2013 is used to tally and track harvest timber volumes. Contracts 1355 and 1646 from Clark County were demonstrated, as well as annual reports for all timber sales harvests 1/1/2013 – 12/31/13. Information from TimberBase 2013 is then entered into WisFIRS for comparison of pre-harvest and post-harvest volume information.
2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information: a) name and contact details of the organization; b) name and address of the customer; c) date when the document was issued; d) description of the product; e) quantity of the products sold; f) the organization's FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: i. the claim "FSC 100%" for products from FSC 100% product groups; ii. the claim "FSC Controlled Wood" for products from FSC Controlled Wood product groups. h) If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other.	C	Current County Forest Timber Sale Contracts and haul tickets are maintained by County Forest Administrators. Whenever changes are made relative to forest certification information, the WCFP manager is consulted. Contracts contain the correct certificate code and FSC claim, as well as elements a)-e). Haul tickets examined (Jackson, Clark, Juneau, and Eau Claire) also have elements a)-g) and are assigned to each timber sale so that they can be traced to the contract.

2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product. **Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2**	C	Haul tickets examined have elements a)-g) of 2.3 as stated above.
2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence. *FSC-ADVICE-40-004-05*	NA	No space constraints.
3. Labeling and Promotion		☐ **N/A**
3.1 Describe where / how the organization uses the SCS and FSC trademarks for promotion.	C	WCFP uses FSC trademarks on haul tickets and the WDNR website. Some counties use FSC trademarks on timber sale prospectuses.
3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.	C	WCFP has sought prior authorization from SCS. Records of approval were emailed to the audit team on August 20, 2014.

3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.	C	Records of approval were emailed to the audit team on August 20, 2014.
4. Outsourcing		[X] **N/A**
4.1 The FME shall provide the names and contact details of all outsourced service providers.		All logging and transport activities are contracted by timber buyers.
4.2 The FME shall have a control system for the outsourced process which ensures that: a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use.		
5. Training and/or Communication Strategies		
5.1 All relevant FME staff and outsourcers shall be trained in the FME's COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME's COC control system.	C	Staff interviewed in Jackson, Clark, Eau Claire, and Juneau Counties demonstrated awareness of when to use haul tickets and how to assign them to each sale. There is low risk for failure to pass COC claims on to buyers since information from 2.3 is included in contract templates. Informal training occurs at WCFA meetings to review certification issues, including COC.
5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).	C	Training on COC procedures occurs for new employees that learn timber sale administration. Since the current COC system is largely automated as information is included in contracts and load tickets by default, training records of training are minimal.

Appendix 7 – Peer Review and SCS Evaluation Team Response to Peer Review

Not applicable – recertification.