

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

## *Wisconsin Department of Natural Resources Managed Forest Law Tree Farm Group*

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### SCS-FM/COC-004622

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

DATE OF FIELD AUDIT
8-12/June/2015
DATE OF LAST UPDATE
27/July/2015

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## Foreword

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

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

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

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

### Organization of the Report

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

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## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Annual Audit Team

<b>Auditor Name:</b>	Kyle Meister	<b>Auditor role:</b>	Lead FSC Auditor
<b>Qualifications:</b>	<p>Kyle Meister is a Certification Forester with Scientific Certification Systems. He has been with SCS since 2008 and has conducted FSC FM pre-assessments, evaluations, and surveillance audits in Brazil, Panama, Mexico, Costa Rica, Bolivia, Indonesia, India, Japan, New Zealand, Spain, and all major forest producing regions of the United States. He has conducted COC assessments in Oregon, Pennsylvania, and California. Mr. Meister has successfully completed CAR Lead Verifier, ISO 9001:2008 Lead Auditor, and SA8000 Social Systems Introduction and Basic Auditor Training Courses. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan; and a Master of Forestry from the Yale School of Forestry and Environmental Studies.</p>		
<b>Auditor Name:</b>	Scott Berg	<b>Auditor role:</b>	Lead ATFS Auditor
<b>Qualifications:</b>	<p>Mr. Berg is the principal in the international consulting firm, R.S. Berg &amp; Associates, Inc. that provides a full range of consulting and auditing services to the SFI, FSC, ISO 14001 EMS and Tree Farm Certification Standards. He has over thirty five years in the forest and paper industry working for national and regional trade associations, and as the owner of a consulting firm. He has had major responsibilities in developing and implementing the Sustainable Forestry Initiative Standard and Certification Procedures, as well as the American Tree Farm System Group Certification Program. He has prepared approximately two hundred (200) clients to achieve independent certification to the Standard of their choice. He is an ISO 14001 trained Lead Auditor and has conducted approximately forty internal and independent audits to the full range of forest certification Standards. He has represented the U.S. forest and paper industry before a number of international standards bodies including: Technical Committee 207 of the International Standards Organization (ISO), the Economic Commission for Europe (ECE) Timber Committee, and the Pan European Forest Certification Council (PEFCC). Scott has also represented the forest and paper industry before congress and the federal agencies addressing private forest policy and research issues.</p>		
<b>Auditor Name:</b>	Dave Wager	<b>Auditor role:</b>	Assistant FSC/ATFS auditor
<b>Qualifications:</b>	<p>As previous FM Director for SCS, Dave spent ten years managing and/or leading Forest Stewardship Council (FSC) endorsed certification assessments on more than 100 forest management operations covering over 25 million acres of forestland across 16 countries. As a certification practitioner, Dave Wager has led FSC forest management and chain-of-custody assessments on a range of private and public operations across North America, Asia, and Latin America. In other natural resources work, Dave played a key role in the development of Starbucks CAFE Practices- a program to</p>		

	ensure procurement of sustainably grown and processed coffee. Dave has 17 years' experience working in forestry and the environmental field. He has expertise in forest ecology and business (B.S. Business, Skidmore College; M.S. Forest Resources, Utah State University). While studying forest ecology at Utah State University, Dave was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth in Utah's Central Wasatch Mountains.
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## 1.2 Total Time Spent on Evaluation

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

## 1.3 Standards Employed

### 1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC-US Forest Management Standard	V1-0	8 – July – 2010
FSC standard for group entities in forest management groups (FSC-STD-30-005)	V1-0	31 – August – 2009
All standards employed are available on the websites of FSC International ( <a href="http://www.fsc.org">www.fsc.org</a> ), the FSC-US ( <a href="http://www.fscus.org">www.fscus.org</a> ) or the SCS Standards page ( <a href="http://www.scsglobalservices.com/certification-standards-and-program-documents">www.scsglobalservices.com/certification-standards-and-program-documents</a> ). Standards are also available, upon request, from SCS Global Services ( <a href="http://www.SCSglobalServices.com">www.SCSglobalServices.com</a> ).		

### 1.3.2. SCS Interim FSC Standards

Title	Version	Date of Finalization
SCS FSC Chain of Custody Indicators for Forest Management Enterprises	V5-1	3 – December – 2012
This SCS Interim Standard was developed by modifying SCS' Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of the Draft Regional / National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, the SCS Draft Interim Standard for the country / region was sent out for comment to stakeholders identified by FSC International, SCS, the forest managers under evaluation, and the National Initiative. A copy of the standard is available at <a href="http://www.scsglobalservices.com/certification-standards-and-program-documents">www.scsglobalservices.com/certification-standards-and-program-documents</a> or upon request from SCS Global Services ( <a href="http://www.SCSglobalServices.com">www.SCSglobalServices.com</a> ).		

## 2 Annual Audit Dates and Activities

### 2.1 Annual Audit Itinerary and Activities

8 – June – 2014	
FMU/Location/ sites visited	Activities/ notes
DNR offices, Madison, WI	Opening Meeting: Introductions, client update, review audit scope, audit plan, update to FSC and SCS standards and protocols, review of open CARs/OBS, final site selection

<p>Depart for field</p>	
<p>Berg: Grant/Vernon</p>	<p><b><u>Larry Maahs 22-001-2008</u></b></p> <p>Met DNR Forester Allen King and Cooperating Forester TD Hawkereid at Potosi and reviewed the ATFS Standard. Discussed location of harvest just above town but on the top of the bluff with no visual impact on the tourist town. Accessed the harvest from the top and inspected the overstory removal and group selection of larger trees to release the hardwood regeneration. Logging occurred during winter under frozen conditions to minimize any ground impacts. Regeneration was vigorous with ample maple and walnut coming in. Several invasive plants had also come up, but would be shaded out as the trees filled in.</p> <p>The Cooperating Forester and DNR Forester encouraged the Mr. Maahs to apply for cost-share to treat the unmerchantable and low valued hardwoods left in the understory. Mr. Maahs has the option to conduct the TSI work himself or contract it out.</p> <p>The small openings were not large enough to gain oak regeneration. To maintain oak in the stand going forward, consideration could be given to selecting larger openings to gain additional regeneration and survival.</p> <p><b><u>Larry Maahs 22-002-2008</u></b></p> <p>Directly adjacent to the recently completed overstory removal, another tract is located down the hill and across the road from Potosi. Similar overstory removal operations are not scheduled until 2026. No activity on this site.</p> <p><b><u>Timothy Schultz 22-027-1996</u></b></p> <p>We had scheduled to meet the landowner on site, but arrived late and he had left to return to Madison. Landowner objectives are heavily weighted toward deer habitat enhancement. TD Hawkereid has worked with Mr. Schultz for over 20 years with the objective of removing single trees of overmature walnuts and salvage of oaks infected with Oak Wilt. The stand is dominated by Walnut, which is the highest returning species of trees in the area. Walked the manicured paths that were also used as skid trails during winter logging operations.</p> <p>Mr. Schultz is a bow hunter and had conducted extensive food plot plantings to attract the deer. Hunting stands are located throughout the property. The deer habitat benefits of forest management have motivated the landowner to actively manage the walnut and improve the stands. Oak wilt was present in patches of</p>

	<p>Oak. The single tree selections for the Oak and Walnut are quite small and probably not big enough to promote adequate Oak regeneration.</p> <p><b><u>Timothy Schultz 70-002-2008</u></b></p> <p>The most recent harvest of small groups was during the Winter of 2015 to remove Oak Wilt on a stand adjacent to the previous harvest in 2010. TD Hawkereid was also the Cooperating Forester and Allen King is the DNR Forester. The site contained a rich and diverse forest community among a rock outcrop and grading down into a draw with lush vegetation and dense stands of largely pure Walnut.</p> <p>Oaks will need larger openings to promote adequate sunlight and regeneration.</p>
<p>Meister: Juneau</p>	<ol style="list-style-type: none"> <li>1. Juneau field office: Review of group member records (ownership, management plans, cutting notices, correspondence, maps, enforcement actions, yield taxes, and MFL fees) and training records of MFL staff. Discussion of record-keeping process and conversion of forestland to non-forest use.</li> <li>2. MFL Order # 29-011-2015: patch selection (partially completed) and improvement thinning (marked and planned). Patch cuts being driven by forest health issues (oak wilt) and marked where advanced oak regeneration is present. Thinnings used to improve growing conditions for designated crop trees with good form and strong crowns. Observation of retention of many species (including minority species), snags, and larger trees. Interview with landowner/ manager (ownership and access rights; property boundary marking; stakeholder consultation over timber harvests, training, etc.).</li> <li>3. MFL 29-030-2012: property boundaries marked and posted. 2013 regeneration/ overstory removal of jack pine to allow stand to naturally succeed to red/ silver maple present in mid-story. Jack pine present in other stands. Oak improvement thinning to favor better formed, more vigorous trees. Group selection stand for uneven-aged bottomland hardwood stand. Discussion on post-harvest monitoring and data updates to plans/ group member files.</li> <li>4. MFL 20-018-2009: property boundaries marked and posted. Red pine salvage from 2011 storm; release of oak, white pine, and jack pine regeneration present and minor species. 2009 harvest of jack pine and observation of riparian management zone (RMZ). 15 ft. equipment exclusion on three foot wide stream; can harvest within RMZ. RMZ management practices are consistent with protecting the species of concern identified on the site in past years.</li> </ol>
<p>Wager: LaCrosse/Monroe</p>	<ol style="list-style-type: none"> <li>1. MFL 32-019-2007: Combination thinning and overstory removal</li> </ol>

	<p>in a stand with low quality timber due to past management. Excellent example of native prairie maintained through CRP adjacent to woods. Observed sensitive species (bobolink). Sawlog sale combined with pulp to help make it economically viable. Follow-up TSI treatment of less desirable box-elder.</p> <p>2. MFL 32-007-1994: 1923 stump sprout origin oak stand. DNR forester’s direct involvement helped ensure better results of sale as green tree retention islands were added and WFLGAP funds were sought and received to ensure smaller non merchantable stems were removed following clearcut. Good BMP’s on steep terrain.</p> <p>3. MFL 32-009-1997: Oak stand transitioning to northern hardwoods. Selection harvest designed and executed to move stand to northern hardwoods. Excellent sugar maple regeneration. Forester showed good awareness of ensuring NHI species not impacted.</p>
<p><b>9 – June – 2014</b></p>	
<p><b>FMU/Location/ sites visited*</b></p>	<p><b>Activities/ notes</b></p>
<p>Berg: Grant/Vernon</p>	<p><b><u>Mattie Orchard Trust 22-010-1996</u></b></p> <p>Met with Richard Valigura, the Cooperating Forester, that marked the timber on the Mattie Orchard tract. The harvests were a light uneven-aged thinning of overmature and declining stands. Remaining stems of Oaks and Walnut are of good to very good quality and high value. Robust regeneration was observed on the entire harvested portion of the track.</p> <p>The skid trail at the lower portion could have used additional water bars. Seeding of the skid trails was excellent and the upper portion of the track had better water bar coverage. Oak Wilt pockets were observed across the track and is reported to be the dominant forest pest. Efforts are made to harvest infected trees as well as trees around the perimeter of the infestation. The combination of overmature trees and Oak Wilt was referred to as “decline” that the forester is seeking to reverse.</p> <p><b><u>Mattie Orchard Trust 22-003-2013</u></b></p> <p>This overmature stand was similar to the other Trust track including overmature Oaks and Walnut. Other component of the stand included other species of Oak, Hickory, Maple and Elm. Corridors of thinned stand lead out from central skid trails to allow for felling without the tops and equipment in the advanced regeneration.</p> <p>The Cooperating Forester’s approach is to a leave buffer along of the edge of the agricultural fields and the forest. A bald eagle was viewed on-site and probably nesting in the Wisconsin River corridor to the West. Discussions with the Forester confirmed that light is</p>

	<p>the limiting factor on the generally productive sites. The discussion revealed that the openings need to be larger to promote more and better Oak regeneration. Constraints to gaining more Oak regeneration involve landowner objectives for smaller openings and maintenance of more residual volume as well as the lack of disturbance during winter logging. Dry weather logging would likely result in better preparation of the seedbed.</p> <p><b><u>Windy Ridge Tree Farm 22-004-2007</u></b></p> <p>This unique track involved an overstocked stand where the trees have been marked and sold, but not yet harvested. The Cooperating Forester, Craig Hollingsworth, cruised the entire stand and marked the timber as appropriate and needed. The landowner, Frank Brazelton, is a hands-on landowner that maintains mowed access and conducts much of the timber stand improvements himself.</p> <p>The non-MFL stands were also visited and discussed. Several involved row panting of White Pine and Walnut with the pine either thinned or removed altogether. The final crop trees of Walnut are free to grow and largely occupying the sites.</p> <p>A stream crossing on the non-MFL portion of the property was also inspected, largely due to the lack of other examples of stream crossings. The rocked approaches and streambed are the preferred BMP for stream crossings and is a text-book example of a proper installation. Rock is reported to be readily available and the approaches extended well up the slope.</p> <p><b><u>The Cheryl Graves Revocable Trust 22-002-2007</u></b></p> <p>This tract followed the same pattern of overmature timber that is in need to overstory removal and salvage. The regeneration was prolific, but the forester acknowledged that the openings were not of sufficient size to allow Oak regeneration. Elm and Butternut Hickory are reported to be the dominate species, which are not the most desirable from an economic standpoint.</p> <p>Two plant species were identified as part of the Natural Heritage Inventory (NHI), but were not observed on the site. A bat cave was identified by the Cooperating Forester, Craig Hollingsworth, and well buffered. The Team visited the cave and discussed the opportunity for Cooperating Foresters and others to notify the NHI program and improve the database. However, field reports to the NHI program are not generally addressed and forestry professional input is not followed up on. An opportunity for improvement is for the WDNR staff to more aggressively communicate improvements in the database.</p>
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	<p>A Bald Eagle nest was visible from the track on the opposite side of the road and stream. Retention roost trees and nest trees are available on the tract for future recruitment. Cultural, ecological and natural heritage sites are identified on the Cutting Notices, along with BMPs to address invasive species.</p> <p><b><u>The Cheryl Graves Revocable Trust 22-003-2007</u></b></p> <p>The additional tract owned by Mike Graves was visited as part of the drive through. The Cooperating Forester prescribed the same general overstory removal and salvage. The landowner was met on site and discussed his manual application of Roundup® herbicide to control vegetation on the bridge crossing the large stream that separated the agricultural lands from the forest. The landowner objective was not to harvest timber, but the mandatory practice of the MFL resulted in timber harvesting and stand improvement.</p> <p><b><u>Daniel Kratochwill 22-003-2009</u></b></p> <p>Inspected skid trail along a Dry Wash leading into the tract. Landowner was not able to gain permission to access the tract from the ridge and was forced to use the narrow skid trail. The trail had encroached on the channel and scouring was evident, along with skid trails leading directly up hill.</p> <p>The DNR Forester and Conversation Agency personnel contacted the landowner, documented the soil damage and prescribed excelsior mats to be installed, along with straw bales. Corrective Action was taken and further damage to the site was averted.</p> <p>The designation of the stream channel as a Dry Wash was unexpected and the BMP Manual addressing such depressions was reviewed. Additional training within the DNR has been conducted on what constitutes a Dry Wash and what the appropriate BMPs should be. Most skid trails and disturbed areas had been seeded and were sufficiently occupied by vegetation to prevent soil erosion. More seeding of skids was observed than on any other audits.</p>
<p>Meister: Juneau</p>	<ol style="list-style-type: none"> <li>1. Juneau field office: review of conversion policies and recent conversions to nonforest land use.</li> <li>2. MFL 29-033-2013: Interview with landowner (benefits of MFL, objectives, site history). Observation of property boundaires and posts. Review of road quality and recent removals of oak wilt pockets and jack pine. Objectives to maintain unaffected oaks and white pines; allow natural succession of oak, maple, and pine. Discussion of relationship with adjacent landowners. Review of cutting notice for natural heritage and archeological information.</li> <li>3. MFL 29-041-2001: white and red pine third row thinnings with</li> </ol>

	<p>operator-select in between remaining rows. Observation of property boundaries. Open to hunting. Interviews with land managers. Review of cutting notice for natural heritage and archeological information.</p> <p>4. MFL 29-052-2013: Interview with consulting forester (confirmation of participation in MFL trainings and other continuing forestry education). Overstory removal to release advanced regeneration of oaks with retention of overstory oaks and white pine in areas with little to no established regeneration. Observation of den trees. Open to hunting. Inspection of adjacent red pine thinning with removal of suppressed and damaged trees. Review of cutting notice for natural heritage and archeological information.</p> <p>5. MFL 29-026-2001: Interview with landowner and consulting forester. Inspection of oak regeneration harvest with advanced regeneration of oak and jack pine; oak stump sprouts after harvest. Retention of overstory oaks in areas with lower density of regeneration. Inspection of pond conversion. Less than 1 acre and less than 1% of ownership. No HCVs present. Pond will contribute to wildlife habitat and recreational opportunities. Review of cutting notice for natural heritage and archeological information.</p> <p>6. MFL 29-022-1992: Interview with landowner and consulting forester. Inspection of fire-damaged stands due to railroad in May 2015. Discussion with landowner and consulting forester over whether or not to salvage and what strategies for retention and harvest openings could be implemented. Observation of railroad right-of-way and adjacent oak wilt salvage area. Discussion of consultation with neighbors. Review of cutting notice for natural heritage and archeological information.</p> <p>7. MFL 29-003-2008: Interview with landowner and logger (confirmation of training credentials: FISTA, SFI, First AID/CPR). Inspection of improvement thinning area used to improve conditions for residual oaks and white pine and transition to group selections in bottomland hardwoods harvested in frozen conditions. Inspection of regeneration in group selection (silver and red maple, ash, swamp white oak, etc.). Review of skid trails; discussion of BMPs for winter trails and riparian areas, and how cutting can be postponed in order to achieve right soil conditions for harvest. Review of cutting notice for natural heritage and archeological information.</p>
<p>Wager: LaCrosse/Monroe</p>	<p>1. MFL 32-002-1993: Oak site transitioning to central hardwoods. Previous management included TSI to encourage oak establishment. Landowners participated in site audit. Scheduled harvest to remove overstory and regenerate oak. Oak was present in the understory but may not be adequate to ensure site is regenerated to oak. More likely outcome is site will be regenerated to central hardwoods with component of</p>

	<p>oak. There is an opportunity to add clarity to silvicultural prescriptions to ensure that landowners have realistic expectations on oak regenerations. Landowner does TSI work himself.</p> <ol style="list-style-type: none"> <li>2. MFL 32-003-1994: Landowner Owen Johnson participated in site audit. Visited three different activities on property. First area was a 7 year old regeneration harvest. Oak established after overstory removal and was competing among aspen and central hardwoods, but in need of release. Second area was a red pine thinning that was well executed. Final area was scheduled regeneration harvest to release oak. TSI work (reverse diameter limit cut and mist blowing glyphosate on ferns) had been done to assist oak regeneration. Parts of stand had very good oak established, but in other areas oak seedlings were scarce.</li> <li>3. MFL 32-004-2009: Oak jack pine clearcut with reserves to promote oak and pine regeneration. Good markets for pulp as 8 bids were received. Brief interview with landowner originally. Advanced oak regeneration was abundant and not damaged during harvest.</li> <li>4. MFL 32-020-2003: Jack pine and scrub oak types. Clearcut with retention. Compromise reached with landowner to leave slightly more stocking than if managed solely for silvicultural objectives. Oak regeneration abundant. NHI species protected through timing of harvest.</li> <li>5. MFL 32-002-2004: Annosum and red pine pocket decline in mature red and white pine plantation. Forester demonstrated good knowledge of forest health and mitigation measures. Good natural regeneration of oak and white pine thus no replanting is necessary. Good marketing of diversity of forest products: telephone poles, saw logs and bolts, pulpwood. Looked at adjacent black walnut planting that was growing fairly well. Good example of landowner/forester understanding appropriate species for micro site conditions.</li> <li>6. MFL 32-20-2014: Two stand property with oak on hillside and bottomland hardwoods along river. Site marked but not yet harvested. DNR forester was successful in encouraging landowner to work with Cooperating Forester. Good silvicultural prescriptions for site including regeneration with retention along hillside patch cuts in bottomland hardwood. Legacy pine trees retained along hillside. Sale will be scheduled in accordance with red shouldered hawk seasonal restrictions.</li> </ol>
<p><b>10 – June – 2014</b></p>	
<p><b>FMU/Location/ sites visited*</b></p>	<p><b>Activities/ notes</b></p>
<p>Berg: Grant/Vernon</p>	<p><b><u>Ron Miller 63-019-1993</u></b></p> <p>Inspected three (3) small aspen clearcuts. Met Mr. Bill Buckley who is the Cooperating Forester and received an overview of the tract.</p>

	<p>Also met both Ron Miller and Harold Havlik on site and reviewed landowner objectives for returning the site to nature and for hunting. Observed a good crossing of a Dry Wash with no activity within the depression and plenty of shade.</p> <p>This MFL property is up for renewal in two years. Mr. Buckley intends to rewrite the management plan and incorporate any needed revisions from the ATFS Standard. Landowner was unaware of the ATFS Program and what opportunities exist to receive the magazine and attend Tree Farm meetings and events. Add new landowners opt-in as part of the renewal process, and opportunity for improvement is to better communicate the benefits of ATFS Certification.</p> <p><b><u>Richard Bertrand 63-015-2007</u></b></p> <p>Inspected a White Pine thinning operation where the Pine were in very poor condition due to blister rust, branching and likely ice damage to the tops. The market for pine pulpwood is very limited due to the long haul distances to pulp and paper mills located further north.</p> <p>Options are limited on the tract. Discussed the option to liquidate the stand and start over. Discussed tree planting programs of the past and why planting of off-site or low valued tree species was not very successful.</p> <p>Drove by a Red Pine thinning and observed from road and skid trail. The Red Pine appeared stagnant and not growing well on this portion of the tree farm. Management options are to thin again and reevaluate the condition and response of the trees.</p> <p><b><u>Catherine Speth 63-045-1992</u></b></p> <p>Climbed up the hill to inspect small single or group selections of Aspen overstory removal by an Amish logger. Stand is overmature in places and is in need of additional thinning. Discussions with the DNR Forester, Joel Jepsen and the Area Forest Leader, Aaron Young indicated a range of views on what prescription comes next.</p> <p>Several management opportunities exist and the treatments would not likely be uniform across the tract. Discussion between the three DNR Foresters revolved around what would be the proper silvicultural treatment, including the need for even-aged management. The input of the DNR foresters is then modified by what the landowner objectives are and how much harvesting they are inclined to do. The objective of the DNR is to work with the landowner to explain what is best for the forest.</p>
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	<p><b><u>Paul Hayes 63-016-2002</u></b></p> <p>Met Mr. Paul Hayes and his grandson on-site to review the recent single tree selection to remove over-mature Oaks and a few White Pine. The White Pine were aged at around 140 years on a rather steep hillside overlooking a Blue Ribbon Trout Stream. The landowner is very hands-on and has girdled some of the understory trees to remove ironwood and other low valued species.</p> <p>The landowner and grandson planted Oak seedlings, but discussions revealed that they are not receiving enough light to grow and occupy the site. The landowner is very conservation minded with objective to protect the trout stream, managed for wild turkey and leave a conservation forest to the next generation. The landowner planted prairie grasses on the top of the ridge for wildlife and restoration.</p> <p>Water bars were installed and seeded, but were not sufficiently outsloped to remove water. Rather, they serve as trenches that and were too frequent, thus causing more soil disturbance. The one main skid trail was well out sloped. Again, the landowner was not well versed on the American Tree Farm System, but was very active in local clubs and conservation organizations. Landowner management plans are detailed and include all required elements. Mgt. plans Exceed the Basic Requirements of the ATFS.</p> <p><b><u>Lee Cunningham 63-201-2004</u></b></p> <p>Met Lee Cunningham on site at his home and travelled to the field. He and a partner conducted the logging themselves without the advice of a Cooperating Forester. The Landowners objective is return site to nature and wildlife while removing the old overstory and allowing more light to the ground.</p> <p>Mr. Cunningham is on the Board of the Kickapoo Landowner Cooperative that wants to become more active in finding markets and a fair price for landowner members. The landowner is aggressively seeking assistance from the DNR on ways that the Coop can be more effective in serving its members and marketing their timber.</p> <p>Walked up the skid trail and observed a large area of overstory removal with more light to the ground than in other harvesting activities that had been inspected over the previous three days. This and other stand are in need of additional TSI Treatment to remove poor quality trees and release the next generation of crop trees. A general observation is that not enough overstory is removed to</p>
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	<p>allow sufficient light for regeneration.</p> <p>Prescription included harvesting in invasive species areas last to avoid spreading seed across the property. Invasive plants were prevalent across all sites visited; most are understory plants that are shaded out following crown closure.</p>
<p>Meister: Adams</p>	<ol style="list-style-type: none"> <li>1. Adams office: verification of MFL staff training records and qualifications. Review of sample of group members records (ownership, management plans, cutting notices, correspondence, maps, enforcement actions, yield taxes, and MFL fees). Review of cutting notice for natural heritage and archeological information.</li> <li>2. MFL 01-029-1994: completed fourth red pine thinning and red pine overstory removal to liberate established white pine and oak regeneration, and marked, unharvested oak regeneration in response to oak wilt; leave tree marking. Observation of black spruce and balsam fir, likely holiday tree abandonment. Verification of property signage and boundaries. Review of cutting notice for natural heritage and archeological information.</li> <li>3. MFL 01-041-2014: First stage of oak shelterwood and operator-select white pine thinning. More mesic site and likely will regenerate to mix of oak, ash, maple, white pine, elm, and other species characteristic of central hardwood type; white pine, maples, oaks, and other species used as crop trees. Concern over invasives near road (buckthorn) and within stand (barberry). Some tamarack planted. Inspection of property boundary. Review of cutting notice for natural heritage and archeological information.</li> <li>4. MFL -1-055-1004: Oak regeneration (black and bur oaks), wetland complex, and red pine thinning. Discussion of training for new DNR staff (forest economist and utilization foresters). Site is at low risk of failure to meet oak regeneration objectives since much of area was fully treated. Pockets of red maple were not felled as specified in plan, but is up to group member to enforce. Discussion of wetland BMPs (winter-harvested), options for adjacency of stands and changing harvest dates to accommodate to lower costs, and archaeological sites. Observation of property boundary. Review of cutting notice for natural heritage and archeological information.</li> <li>5. MFL 01-085-1998: Oak regeneration harvest due to oak wilt and storm damage (winter harvest); focusing on retention of health black oaks and all white oak per group member's objectives. Group member liberates individual oak seedlings manually; mostly red maple and poplar regeneration present. Property surveyed when purchased; observation of property corner and survey marker. Interview with group member and consulting foresters. Discussion of lumping sales due to winter harvests,</li> </ol>

	<p>and consultation and interaction with neighbors over property boundaries and other issues. Review of cutting notice for natural heritage and archeological information.</p> <p>6. MFL 01-013-2015: oak regeneration, red pine thinning, and red pine clearcut (all marked, but not harvested). Oak wilt and red pine decline are factors. Will plant mix of white pine and white oak due to site conditions and presence of oak wilt. Many mid-to over-story black oaks will be removed throughout stands to be harvested due to oak wilt; most healthy retention trees identified within stands. Some areas will allow to succeed to central hardwood type for diversity. Property boundary near sale given ~200 ft. buffer to avoid any potential conflicts over ownership; forester has requested survey. Interview with consulting forester over archeological and natural heritage training. Discussion over harvest monitoring and post-harvest regeneration checks, which can be coordinated with MFL staff. Review of cutting notice for natural heritage and archeological information.</p> <p>7. MFL 01-033-1991: first red pine thinning (third row with no removal in between remaining rows). Shorter reentry period on red pine to possibly combine with other timber sales on property. Stumps treated during harvester with cellu-treat (Disodium Octaborate Tetrahydrate (CAS No. 12280-03-4)) to prevent the spread of <i>H. annosum</i> root rot that affects red pine; discussion over chemical use policy and derogations. Cellu-treat is not on FSC-prohibited list. Oak regeneration harvest in area miscategorized as riparian; however, area is typed correctly in cutting notice and will be updated as part of next planning cycle. Review of cutting notice for natural heritage and archeological information.</p>
<p>Wager: LaCrosse/Monroe</p>	<ol style="list-style-type: none"> <li>1. MFL 42-006-2004: Oak and central hardwood stand with two aspen stands that were regenerated via clearcut. Aspen regenerated successfully.</li> <li>2. MFL 42-204-1996: Red pine thinning marked by Cooperating Forester and cut by landowner. Excellent marking and harvesting with no residual stand damage. Harvest was timed to mitigate impacts to NHI species that may have been present.</li> <li>3. MFL 42-006-2012: Oak clearcut with retention marked but not yet harvested. Small pocket of oak wilt was left inside of a buffer patch. Advanced oak regeneration prevalent in stand and should regenerate well to oak. Levels of green tree retention marked were consistent with DNR requirements.</li> <li>4. MFL 42-008-2000: Landowner, forester, and logger all present on site. Red pine plantation origin 1961. Plantation damaged during 1998 windstorm and subsequently experienced widespread mortality. Due to mortality, forester changed the prescription from thinning to regeneration harvest. Good natural regeneration of oak and pine spp.</li> </ol>

	<ol style="list-style-type: none"> <li>5. MFL 42-046-2001: Oak clearcut with retention. MFL property classified as “open” and has snowmobile trail through property. Stand will naturally regenerate to oak and pine. While it may take some time to get over deer browse, adjacent areas cut in 2005 eventually had good stocking of desirable species. Interview timber buyer and review of FSC scale tickets. Harvest timing adjusted to mitigate NHI species requirements.</li> <li>6. MFL 42-35-2003: Planned clearcut in scrub oak of pole timber and sawtimber size. Harvest marked with minimal green tree retention (approximately 2 trees per acre). Timing of harvest adjusted to mitigate NHI species requirements. Despite low quality timber, forester did a good job at setting up the sale so that several bids were received. See Observation related to DNR green tree retention requirements of 5-15% of crown cover.</li> </ol>
<b>11 – June – 2014</b>	
<b>FMU/Location/ sites visited*</b>	<b>Activities/ notes</b>
Berg: Grant/Vernon	
Meister: Adams	<ol style="list-style-type: none"> <li>1. MFL 01-057-2014: Aspen and jack pine overstory removal with retention of midstory oak. Winter-harvested, harvest still incomplete. Will re-enter when soil conditions improve. Starting to achieve aspen, jack pine, and oak regeneration. Interview with group member. Review of cutting notice for natural heritage and archeological information.</li> <li>2. MFL 01-043-1991: Oak regeneration harvest on open MFL lands. Variable retention. Oak regeneration established in several areas. No re-entry scheduled until next planning cycle. Good aesthetics for road. Observation of property boundaries. Review of cutting notice for natural heritage and archeological information. Review of cutting notice for natural heritage and archeological information.</li> <li>3. MFL 01-223-1998: Red pine thinning on open MFL lands; marked, but not yet harvested. Removal of forked, scuffed, and other deformed trees. Most trees have good form. Interview with student trainee forester (verification of health &amp; safety training and discussion of work conditions). Review of cutting notice for natural heritage and archeological information.</li> <li>4. MFL 01-027-1993: Completed red pine thinning couple with first oak shelterwood step. Overstory removal to be scheduled for next planning cycle. Review of cutting notice for natural heritage and archeological information.</li> <li>5. MFL 01-045-2004: Red pine overstory removal due to pocket decline; release white pine and oak regeneration. Discussion over how boundary dispute was settled. Observation of unsuitable areas (within 20% allowance). Review of cutting notice for natural heritage and archeological information.</li> <li>6. Review of MFL policies and procedures with Adams County DNR staff.</li> </ol>

<p>Wager: LaCrosse/Monroe</p>	<ol style="list-style-type: none"> <li>1. MFL 42-023-1996: Two aged stand of oak that is naturally converting to maple. Marked with an improvement cut and some group openings. A high quality site for this County and prescription leaves good quality oak trees that will likely continue to grow well. Efforts were in place to protect NHI species that may occur on site.</li> <li>2. MFL 42-068-2002: Harvest originally prescribed as a 1<sup>st</sup> stage shelterwood, however, extensive oak wilt resulted in a heavier cut. Oak wilt harvest restrictions were followed. Site will likely regenerate adequately to central hardwoods with an oak component. Understory very heavy to <i>Rubus</i> spp., which may help protect oak seedlings from deer browse. Newly created road on property was well seeded. Water bars were installed but may need to be reshaped at some point. Extensive garlic mustard in some areas of sale. Removal of more of the mid-story poles that were left would help in regenerating stand, but pulp wood markets were not conducive at the time of sale.</li> <li>3. MFL 42-012-2010: Selective harvest in mature oak/central hardwoods stand that will maintain mature forest condition. Small amount of oak wilt removed. Harvest went well with no residual stand damage or BMP issues. Logging contract cleaned equipment of invasives prior to entering site. Interview logging contractor who marked the harvest. Logs sold to local Amish mill.</li> <li>4. MFL 42-053-2005: Clearcut with retention in oak/central hardwoods types. Management plan originally called for selection cutting to slowly convert the site to northern hardwoods, however, owners wanted a much heavier cut to improve wildlife habitat. No concerns about the site regenerating adequately, however, the plan should be re-written to reflect the change in management direction.</li> <li>5. Tomah Office: Review of training records, WisFIRS, WFLGP grants, inventory records, MFL property deeds, and tax payment records.</li> </ol>
<p><b>12 – June – 2014</b></p>	
<p><b>FMU/Location/ sites visited*</b></p>	<p><b>Activities/ notes</b></p>
<p>DNR offices, Madison, WI</p>	<p>Closing Meeting Preparation: Auditors take time to consolidate notes and confirm audit findings. Closing Meeting and Review of Findings: Convened with all relevant staff to summarize audit findings, potential non-conformities and next steps.</p>

## 2.2 Evaluation of Management Systems

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME’s conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a

broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

### 3. Changes in Management Practices

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

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

### 4. Results of the Evaluation

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#### 4.1 Existing Corrective Action Requests and Observations

<b>Finding Number: 2014.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US, indicator 4.2.b.
<b>Non-Conformity (or justification):</b> Two logging contracts reviewed in the Southern districts did not include or reference safety requirements. All other logging contracts reviewed contained reference to safety requirements. Contracts for MFL Order #s 23-007-1992 and 23-006-2002 lacked reference to safety requirements. The contract templates that loggers were using were not consistent with the templates provided by the Wisconsin Woodland Owners' Association ( <a href="http://www.wisconsinwoodlands.org/resources.php">http://www.wisconsinwoodlands.org/resources.php</a> ) that MFL staff have provided significant comments on regarding certification requirements, including safety.	
<b>Corrective Action Request (or observation):</b> MFL should ensure that these logging contractors are aware of the requirement that contracts or other written agreements include safety requirements.	
<b>FME response (including any evidence submitted)</b>	<p>WDNR's <a href="#">Private Forestry Handbook (2470.5)</a> provides guidance on the WDNR Forester's responsibilities and limitations on interactions with private landowner timber sales (both tax-law and non-tax-law related). Chapter 30 specifically outlines standard operating procedures for timber sale assistance, "<i>Department foresters are not to engage in timber sale administration, handling of contracts of financial considerations, or scaling of cut products.</i>"</p> <p><a href="#">Chapter NR 1.212(3) Wis. Admin Code</a>, itemizes limitations, exemptions and prohibited services:                  The rule lists specific services that Department foresters may not provide, including:</p> <ol style="list-style-type: none"> <li>1. Appraisals of forest land, timber, timber damage, or right-of-ways. This prohibition does not preclude Department foresters from providing general information on established stumpage values and current market trends.</li> <li>2. Timber sale boundary establishment other than with a hand compass.</li> <li>3. Private boundary line establishment by any means.</li> <li>4. <b>Preparation or enforcement of timber sale contracts other than providing an approved sample contract form.</b></li> </ol> <p>Guidance from Chapter 30 in the Private Forestry Handbook: "<i>Encourage the sale of all private timber stumpage by written contract. Inform the landowner of the types of conditions and requirements often included in the Department's timber sales or the Sample Timber Sale Contract (Publication FR 202 2009). Samples of these forms may be provided. Suggest the landowner consult with an attorney with timber sale experience or with a qualified cooperating forester regarding contract provisions. Under no circumstances should the DNR forester write contracts for a landowner or enter into agreements for sale of timber on behalf of a landowner.</i>"</p> <p>The Wisconsin Woodland Owner's Association's sample timber sale contract is provided to MFL Landowners for reference purposes. However, MFL Landowners</p>

	<p>are not required to utilize the WWOA sample contract and are free to conduct business matters regarding timber sales contract provisions and transactions without DNR advisement.</p> <p>Further, MFL Landowners are not required to provide timber harvest contracts to WDNR Foresters for review or approval, neither at time of sale nor at time of harvest implementation. Without this knowledge, WDNR Foresters are normally unaware of specific contract language between the landowner and the timber purchaser, which would include safety issues.</p> <p>Additional guidance from Chapter 30: <i>“DNR foresters are prohibited from enforcing private timber sale contracts, but may continue to observe harvest operations to see how well the harvest prescription is being followed. <b>If any contract violations are observed, report them to the landowner or the landowner’s agent, not the logger.</b> Let the owner take any necessary action.”</i> In practice, WDNR Foresters’ workload and scheduling may allow them to make spot inspections on active logging operations if in the general area. However, they are not required by policy to inspecting active logging operations on MFL enrollments for landowner timber sale contract compliance.</p> <p>Chapter 21 of the WDNR Forest Tax Handbook provides this guidance: <i>“DNR Service Foresters may ask landowners or their agents about private timber sale contract terms to verify MFL sound forestry compliance, <b>but DNR foresters do not administer private contracts.</b> The Department does not generally require or keep copies of private timber sale contracts since Department files do not protect confidential information that might be contained in the contracts.”</i></p> <p>WDNR Division of Forestry as an agency routinely works with external partners to encourage safe and responsible logging. In Wisconsin, the Forest Industry and Safety Training Alliance (FISTA) provides an annual schedule of training workshops for logging professionals, foresters, and other interested persons on a variety of pertinent forestry topics, and normally includes one or more safety-oriented programs. Their current schedule lists the following safety courses as available in 2015: Chemical Spills on Logging Operations; OSHA for Loggers; Equipment Fire Prevention and Safety; DOT Compliance; Wilderness Rescue; and 4 separate skill level workshops for chainsaw safety.</p> <p>Wisconsin also has a Master Logger Program administered by GLTPA, and currently lists 52 separate logging firms as certified Master Loggers.</p> <p>Not all logging professionals in Wisconsin take the FISTA courses nor become certified Master Loggers. DNR Foresters routinely maintain a list of all logging contractors operating in any specific area and provide it to landowners with mandatory practices due and when specifically requested. In all cases, DNR Foresters are prohibited from recommending or rating specific logging contractors for landowner use.</p> <p>In 2014, DNR Public &amp; Private Forestry Section Chief Jim Warren spoke with the Editor for the Great Lakes Timber Professional Association’s (GLPTA) monthly publication regarding logger safety and private timber sale contracts. A Draft manuscript written by Kathy Nelson was submitted for a suggested article in their publication (see attached), but to-date has not been published.</p>  <p>Safety_Language_Draft_for_GLTPA_Maga</p>
<p><b>SCS review</b></p>	<p>Given that FME staff must respect group members’ rights to negotiate and</p>

	<p>enforce contracts, the guidance that private forestry associations such as WWOA provide on contracts is one of the few tools available to communicate the importance of safety and the inclusion of health &amp; safety language in contracts.</p> <p>During the 2015 audit, SCS also discovered the UW Extension has produced publications to guide forest landowners through the timber sale process, including common elements of contracts.</p>
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

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

<p><b>FME response</b> (including any evidence submitted)</p>	<p>Legislative guidelines for WDNR Forester private timber sale activities are provided in ch. NR 1.212 Wis. Admin Code  <a href="http://docs.legis.wisconsin.gov/code/admin_code/nr/001/1/21">http://docs.legis.wisconsin.gov/code/admin_code/nr/001/1/21</a></p> <p>Operational guidelines for WDNR Forester’s roles in private timber sales are provided in Chapter 30 of the WDNR Private Forestry Handbook (2470.5).</p> <p>Where practical, WDNR Foresters may encourage proximate landowners to cooperatively work together to sell difficult-to-market mandatory timber sales scheduled in a common timeframe as a package or bundle to provide a more operationally feasible opportunity to potential logging contractors.</p> <p>In 2014, WDNR hired four new Forest Products Specialists in the Division’s Forest Products Services Program. They are tasked with a wide spectrum of activities and services with external partners related to forest products marketing and utilization. One of the Specialists has statewide responsibilities, and the other three have regional responsibilities with one assigned directly to southeastern WI, and another to southwestern WI, and the third to northern WI. By providing assistance to the wood products industry in Wisconsin, the program seeks to grow jobs and nurture new and novel wood using technologies. The program produces quarterly Wood Marketing Bulletins, does an annual Timber Products Output Survey, maintains an online wood using database, provides education and outreach support, supplies forest inventory data, and promotes sustainable forestry through sustainable business.</p> <p>Also in 2014, the Division of Forestry added and filled a new dedicated position for a Forest Economist. The position will help address ongoing issues and challenges related to economic aspects of forest management on private lands.</p> <p>Beginning in late 2012, all four Division of Forestry Districts initiated periodic meetings in each of the subsequent years with forestry industry representatives and Cooperating Foresters in each district to discuss issues and concerns, and work to formulate recommendations for improvements in DNR policy and operations with a goal of improving communications with external partners, and working together to address mutual challenges facing Wisconsin’s forest products industry and sustainable forest management. Since late 2012, 13 separate meetings have been held with attendance of approximately 230 external partners.</p>
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<b>SCS review</b>	<p>In addition to providing evidence of the new hires, SCS interviewed the forest economist who discussed the initiatives to lump timber sales. A study was conducted through Great Lakes Timber Professionals Association, which maintains data on the study. This information eventually will be made available online. The forest economist discussed other projects underway to study smaller timber sales, such as timing of timber sales to be able to lump more of them together.</p> <p>Through interviews with a DNR silviculturalist, SCS found that species such as Black walnut can withstand some suppression and be thinned from above as observed in 2014. SCS also found further evidence that the issue of harvesting smaller diameter and lower quality trees in the southern part of the state to achieve management objectives is largely a socioeconomic one as there are few commercial options available. In addition to clustering timber sales, the ability to cluster mandatory and non-mandatory secondary treatments may also help to lower their costs.</p>
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

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

**Non-Conformity (or justification):** On some of sites in Rock County, stands that were harvested under uneven-aged management (single-tree, group/ single-tree and group selection) had several of the largest trees removed or had high volumes of desirable species removed (e.g., oak species), which may make securing natural regeneration of these species difficult. Evidence reviewed included comparisons of pre-harvest and post-harvest volumes of species harvested; observation of oak clumps in which the outer, swooping trees were retained while those in the center were harvested; and observation of retained species.

The lack of enough desirable seed sources could result in the loss of some species of these intolerant to mid-tolerant guilds over time. The Silvicultural Manual emphasizes that uneven-aged management systems are to be used to continually develop quality growing stock of multiple age classes, which is not happening in all cases. It warrants mention that many of the stands observed had merchantable or sub-merchantable individuals for the next entry; however, some intolerant to mid-tolerant species had their basal areas lowered to a point where regeneration may not be successful without site preparation or supplemental planting.

In Waukesha and Rock Counties, some young planted walnut stands were suppressed due to intraspecific competition. This occurred on some properties that had dedicated a significant portion of land to walnut timber production. If timely pre-commercial thinning or other timber stand improvement activities are not conducted, it will take longer to achieve a stand with merchantable timber.

**Corrective Action Request (or observation):** Rates and methods of timber harvest should lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, should be returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.

<p><b>FME response</b> (including any evidence submitted)</p>	<p>MFL management plans describe individual forest stands on enrolled parcels, and include recommended silvicultural treatments and timing of operations to achieve desired stand condition for the production of future forest crops through sound forestry and considerations of the landowner’s individual management goals.</p> <p>If stand conditions change from the time the management plan is written to the time that a Mandatory Practice is required, or a Non-Mandatory practice is scheduled for implementation, or a new owner desires changes to address new management goals, then the WDNR Forester and the Landowner may mutually agree to amend the management plan to reflect and capture those changes (<a href="#">s 77.82 (3)(f) Wisc. Stats.</a>).</p> <p>For changes agreed to for mandatory harvests, harvest prescriptions approved on the Cutting Notice should describe current stand conditions and adjust the applied silviculture as needed within the acceptable framework of sound forestry. The WDNR Forester’s responsibility is to document those changes. Landowners may implement non-mandatory practices without WDNR Forester notification or advisement, and those changes may not necessarily be captured without direct communication from the landowner, or from other discovery.</p> <p><a href="#">Chapter NR 46.18 Wis. Admin Code</a> describes density levels necessary to meet minimum productivity standards for continued eligibility in MFL, as well as requires that at least 80% of the enrolled parcel meet those minimum productivity levels. Landowners with stands that fall below those specific density levels are given an opportunity with a time limitation to bring levels back up in order to remain in MFL. Frequently, that may involve mandatory artificial reforestation, but could include other mandatory practices as well (e.g. site prep, competition control).</p> <p>The WDNR Silvicultural Handbook and the Wisconsin Forest Management Guidelines are available as reference for all WDNR Foresters, landowners, and other professional forestry practitioners in the practical application of scientific silviculture principles to best achieve stated management goals in MFL management plans. They provide both general and more specific technical information for use in evaluating current stand conditions, in making planning decisions, and in guiding implementation of on-the-ground practices.</p> <p>With stands that are damaged by storms and other natural events, management plans and cutting prescriptions can be amended to carry out salvage and sanitation harvests as necessary for productivity and health. If regeneration measures must be carried out to bring the stocking back to required density levels, those mandatory measures must be planned and followed to maintain the stand in a productive condition.</p> <p>For stands with past management history which have lowered the productivity below MFL requirements, mandatory practices will be prescribed to bring the stand back into compliance in order to maintain eligibility in the program.</p> <p>The WDNR Bureau of Forestry has three Silviculturalists on staff as resource personnel to provide guidance, training, and assistance in answering general and site-specific silviculture requests, to update the DNR’s Silviculture Handbook utilizing current science, and to aid in developing silviculture policy for WDNR’s forestry programs including MFL, through direction of a Silviculture Guidance Team comprised of both WDNR and external partners.</p>
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<p><b>SCS review</b></p>	<p>Through interviews with a DNR silviculturalist and other DNR staff, SCS found evidence that the issue of harvesting smaller diameter and lower quality trees in the southern part of the state to achieve management objectives in the long-term is largely a socioeconomic one as there are fewer commercial options available. In addition to clustering timber sales, the ability to cluster mandatory and non-mandatory secondary treatments may also help to lower their costs. In other cases, FMUs may be too small or close to other adjacent invasive species infestations to justify maintaining the same stand type.</p> <p>Through interviews with the forest economist and utilization specialist, it was found that DNR has several state-wide projects. There are three district specialists that work with foresters and cooperating foresters to connect various players in industry and encourage the development of new markets. DNR’s target objective has been to promote industry and establish new businesses in Wisconsin, such as biomass and products derived from biomass. DNR is conducting a feasibility study of the supply chain, logistics, and other factors for such projects. There are some investigations into uses for urban wood and smaller woodlots, such as creating a directory of businesses that have portable sawmills.</p>
<p><b>Status of CAR:</b></p>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Upgraded to Major  <input type="checkbox"/> <i>Other decision (refer to description above)</i></p>

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

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

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

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

**FME response**  
(including any evidence submitted)

**First Action:** DNR has modified its Private Forestry Quarterly Report (also known as Accomplishment Report) as follows:

- “Certified” added before MFL to more accurately show what numbers are to be included
- Removed the examples from behind each chemical name
- Added a field to enter the trade name(s) used. Report will show acres by chemical even if there was more than one trade name.

**Pesticide Application on Certified MFL Land**

**Treatment Completed**  
Include any pesticide applications completed on certified MFL land that you are aware of unless you know that a Cooperating Forester was involved in the implementation.

Number

Total Acres (list detail by type below)

Chemical Name	Trade Name	Acres
a. Clopyralid	NA	0
b. Glyphosate	NA	0
c. MetsulfuronMethyl	NA	0
d. SulfometuronMethyl	NA	0
e. Triclopyr	NA	0
f. 2,4-D	NA	0
g. Borax	NA	0
h. Other	NA	0
i. Other	NA	0

**Second Action:** DNR sent a reminder to DNR Foresters, DNR Supervisors, Certified Plan Writers, and Cooperating Foresters that FSC prohibited chemicals are not allowed to be applied to MFL Certified Lands and included instructions on how to identify FSC-prohibited chemicals. See attached email.

**This email is being sent to DNR Foresters, DNR Supervisors, Certified Plan Writers and Cooperating Foresters. Please forward to others who may be interested in this information.**

Greetings,

I am sending you this email as a reminder on how to verify the formulation of herbicides and other chemicals that are applied on MFL certified lands to ensure that they are not on the FSC-prohibited chemical list. I am sending this as a result of Major CAR that DNR received as a result of the June 2014 MFL Certification Audit. Specifically, the audit found that prohibited formulations of 2,4-D were being applied on MFL-Certified lands.

- Review the list of FSC-prohibited chemicals at <http://dnr.wi.gov>, search forest certification, click on *MFL certification*, click on *FSC prohibited chemicals is available [PDF]*.
- There are 2 ways to identify FSC-prohibited chemicals when looking at product labels.
  1. Read the label to find the name of the chemical and compare it to the list as posted on the DNR web site. If the chemical name on the label is found on the list of FSC-prohibited chemicals, please prescribe a different chemical to use.
  2. In the list of FSC-prohibited chemicals from the DNR web site, use either of the two links in the document to search for the chemical and Trade Name.
- If the chemical that you are prescribing is on the FSC-prohibited chemical list, please prescribe a different chemical. A list of chemicals can be found on the DNR web site at: <http://dnr.wi.gov>, search *herbicide*.

If you have questions on using these tools, please let me know. Thanks.

**Action from 2012:** In 2012, DNR conducted a survey to determine the extent of chemical use (and in particular the use of simazine) on MFL lands and reported to FSC auditors on May 21, 2012 the results. The PowerPoint show summarizes the findings. The attached pdf document outlines all findings.



DNR Actions to Close DNR\_Actions\_To\_Clo  
Out 2011 NCRs.ppt se\_Out\_NCRs.pdf

<b>SCS review</b>	MFL's actions address the root cause by allowing for more accurate collection of chemical names. MFL also provided email records to demonstrate that staff have been informed of updated procedures (sent November 17, 2014). This CAR is closed.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

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

<p><b>FME response</b> <i>(including any evidence submitted)</i></p>	<p>MFL management plans are written at the time of original entry, re-enrollment, and updated at transfer following land sale from one landowner to another. Mandatory practices (listed in <a href="#">ch. NR 46.18 (2) Wisc Admin Code</a>) and non-mandatory practices are described at time of management plan development in consideration of current stand conditions, projected growth and stand development, and landowner individual goals with established target implementation dates set for practice completion.</p> <p>Letters are sent to landowners each January to inform them that their mandatory practice is due the following year. A reminder letter is sent the following January if the practice hasn't been established, or cut, or contact made with the DNR Forester.</p> <p>If stand conditions change from the time the management plan is written to the time that a Mandatory Practice is required, then the WDNR Forester and the Landowner may mutually agree to amend the management plan to reflect and capture those changes (<a href="#">s 77.82 (3)(f) Wisc. Stats</a>).</p> <p>WDNR recognizes several reasons for amending management plans, among them being:</p> <ol style="list-style-type: none"> <li>1) By mutual consent between the landowner and DNR due to changes in ownership, changes in objectives, new management methods, etc.</li> <li>2) Required if upon review, DNR Foresters find old MFL plans that prescribe FSC prohibited pesticides.</li> <li>3) Required to amend management prescriptions based on current stand conditions and current science.</li> <li>4) To amend management practices and dates after completion of management practices.</li> </ol> <p>Revisions to management plans occur following updates to reconnaissance data resulting from completed mandatory practices, primarily timber harvests. A new management plan should be printed and given to landowners as a record of changes that have occurred. WisFIRS allows management plans to be regularly updated.</p> <p>For changes agreed to for mandatory harvests, harvest prescriptions approved on the Cutting Notice should describe current stand conditions and adjust the applied silviculture as needed within the acceptable framework of sound forestry. The DNR Forester's responsibility is to document those changes</p> <p>For harvest practices, Cutting Notice development primarily occurs prior to actual implementation of the practice. <a href="#">S 77.86(1) Wisc. Statutes</a> specifies the required time-frame for submission of a Cutting Notice by a landowner to the DNR, and the time-frame given WDNR to respond to that Cutting Notice. If the Cutting Notice prescription conforms to the management plan and is consistent with sound forestry, then the WDNR Forester approves the Cutting Notice. If the Cutting Notice prescription does not conform to the management plan or is not consistent with sound forestry, then the WDNR Forester assists the landowner in developing an acceptable prescription before approving the Cutting Notice. If an acceptable</p>
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<p><b>FME response</b> (including any evidence submitted)</p>	<p>prescription cannot be agreed on, the WDNR Forester has the oversight authority to not approve the Cutting Notice, require alternative prescriptions, and/or follow the enforcement procedures if needed.</p> <p>Additional training took place in summer 2014 to reaffirm information required for cutting notice assessment and approval, as well as close out Major Car 2014.6. The training consisted of an on-line series of self-paced videos reviewing each section of the form separately. Guidance for consulting the management plan are emphasized in the videos. Please refer to the attachment for evidence of training:</p> <div style="text-align: center;">  <p>2013_14_CAR_Close out.docx</p> </div> <p>Since the WisFIRS's implementation in 2012 for the Private Forestry MFL program, 232 WDNR Forestry staff and 184 non-WDNR foresters have taken the initial WisFIRS training course in management plan preparation. Since that time, over 22 email communications have been distributed to all WDNR Foresters and CPW's informing them of changes in WisFIRS as new versions become available due to upgrades, corrections, and the development of new modules. Within the WisFIRS Private Lands system, the available HELP menu provides a comprehensive up-to-date source of reference for system users regarding management plan development and content. The Frequently Asked Questions section addresses issues common to system users, answers specific questions that arise, and provides information resulting from updates and changes.</p> <p>Following completion of the 2014 FSC audit, additional background and stand history information was gathered in Rock County by a WDNR Forestry Team Leader and WDNR Forester for those sites visited as a follow-up for validation of the management actions previously implemented. The written summary report was provided to the FSC Auditor in July 2014 for further consideration.</p>
<p><b>SCS review</b></p>	<p>The most current template for MFL management plans provides general descriptions of other components of the management plan available to assist landowners in handling common issues, such as invasive species. For example, the Forest Management Guidelines include descriptions of prescribed fire practices that can be used to control invasive species. Records for training conducted in 2014 on the new cutting notices was provided in responses to Major CARs closed in 2014. The plans cited in the nonconformity will be updated 25 years from the effective date per the regulations of the Wisconsin Managed Forest Law to reflect changes in landowner objectives and management practices. It is expected that training on writing plans to the new specifications will help to avoid future occurrences of plans that contain significant numbers of non-mandatory practices that may be necessary to fulfill later scheduled mandatory ones. The cutting notice also includes measures to allow for a change in mandatory practices based on current conditions, such as the presence of pathogens.</p>

<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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<b>Finding Number: 2014.9</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-US indicator 7.2.a.
<b>Non-Conformity</b> (or justification): Failure to close Minor CAR 2013.8 by 2014 audit. MFL program has drafted a comprehensive training program, but has not yet implemented it. Training is scheduled for June-August 2014.	
<b>Corrective Action Request</b> (or observation): Evidence of corrective action and conformance with applicable requirements must be submitted by the deadline stated above.	
<b>FME response</b> (including any evidence submitted)	<p>DNR has completed the on-line training for filling out the cutting notice and report form. A total of 382 people have passed the training, including:</p> <p>216 DNR Employees                      159 Certified Plan Writers (CPWs)                      13 Cooperating Foresters (non-CPWs)                      2 Private Foresters                      2 DNR Forestry Technicians                      392 Total</p> <p>The exact steps to complete the training include:</p> <ol style="list-style-type: none"> <li>1. DNR announced the on-line training of how to fill out the Cutting Notice and Report Form to DNR Supervisors, Certified Plan Writers and Cooperating Foresters on June 26, 2014 to alert staff and partners of the upcoming training.</li> <li>2. DNR announced that the on-line training was ready and available for DNR staff and partners to access.</li> <li>3. A list of DNR Foresters, Certified Plan Writers, Cooperating Foresters and others has been developed.</li> </ol>

<b>SCS review</b>	<p>In addition to the description above, DNR provided records of the training announcements and a weblink to the training (<a href="http://dnr.wi.gov/topic/ForestLandowners/cuttingNoticeTraining.html">http://dnr.wi.gov/topic/ForestLandowners/cuttingNoticeTraining.html</a>). Participants were required to take an online quiz after viewing the presentations, which allowed DNR to track attendance. DNR staff and CPWs were required to complete the training as they are involved in the planning and cutting notice process. To entice others not required to take the training, DNR provide continuing education credits for SAF Certified Foresters and Wisconsin Cooperative Foresters.</p>
<b>Status of CAR:</b>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Upgraded to Major  <input type="checkbox"/> Other decision (refer to description above)</p>

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

FME response  
(including any  
evidence  
submitted)

MFL management plans are written at the time of original entry, re-enrollment, and updated at transfer following land sale from one landowner to another.

Mandatory practices (listed in [ch. NR 46.18 \(2\) Wisc Admin Code](#)) and non-mandatory practices are described at time of management plan development in consideration of current stand conditions, projected growth and stand development, and landowner individual goals with established target implementation dates set for practice completion.

Since WisFIRS's implementation in 2012 for the Private Forestry MFL program, 232 WDNR Forestry staff and 184 non-WDNR foresters have taken the initial WisFIRS training course in management plan preparation. Since that time, over 22 email communications have been distributed to all WDNR Foresters and Certified Plan Writers (CPW's) informing them of changes in WisFIRS as new versions become available due to upgrades, corrections, and the development of new modules. See attached training list for all WDNR and non-WDNR personnel trained to-date:



WisFIRS\_PrivateLandsTraining\_2015Repc

Annually, the WDNR Forest Tax Program presents MFL Recertification training sessions to address focus areas of the MFL program. All WDNR Forestry staff involved with MFL along with DNR Supervisors, and CPW's are required to attend. In 2013, the annual training discussed updating management plans. See attached workbook, pages 6-8:



2013\_MFL\_ReCert\_Day\_2\_Workbook.pdf

In 2014, seven MFL annual recertification training sessions were held in different geographic areas of the state. A total of 241 WDNR personnel and 170 CPW's attended the sessions and received update training. The agenda is attached:



2014 MFL Recertification Agend

WDNR Foresters and additional staff administering MFL actions are required to take NHI training at least once every 5 years per [DNR Manual Code 1753.1](#), and are provided with NHI procedural and content updates as available from the Bureau of Natural Heritage Conservation. Recent examples of updates include the re-listing of the Gray Wolf, and new guidance on the Northern Long-eared Bat:



CORRECTION  
Template language fc



Northern long-eared  
bat Guidance.msg

(<http://dnr.wi.gov/topic/nhi/>) with an annual training calendar of on-line and face-to-face training sessions. "*NHI Training for Forestry Professionals*" was provided at 16 sessions from November 2013 through March 2014. Over 250 DNR staff completed the course and passed the exam for continued access to the NHI Portal. In addition, on-line training is available for all DNR staff on-demand.



<p><b>FME response</b> (including any evidence submitted)</p>	<p>WDNR’s Bureau of Natural Heritage Conservation is responsible for training WDNR personnel, and other non-WDNR NHI users, and maintains both an internal and an external website ( <a href="http://dnr.wi.gov/topic/nhi/">http://dnr.wi.gov/topic/nhi/</a> ) with an annual training calendar of on-line and face-to-face training sessions. <i>“NHI Training for Forestry Professionals”</i> was provided at 16 sessions from November 2013 through March 2014. Over 250 DNR staff completed the course and passed the exam for continued access to the NHI Portal. In addition, on-line training is available for all WDNR staff on-demand.</p> <p>The attached NHI Training flyer outlines the training sessions for 2015.</p>  <p>NHI_Training_Flyer_2015.pdf.pdf</p> <p>Procedures for accessing NHI data for use in MFL applications (management plan preparation, and in Cutting Notice preparation) by WDNR Foresters and staff are outlined in:</p> <ol style="list-style-type: none"> <li>1) Appendix 10 of the Forest Tax Law Handbook,</li> <li>2) In the on-line WisFIRS Private Lands Help Manual, and</li> <li>3) the internal WDNR NHI Portal site</li> </ol> <p>To address closing out Major CAR 2014.6, an on-line series of self-paced videos was produced for training purposes in completing WDNR Cutting Notice forms prior to harvest. Within the videos, instructions are provided for completing the form section by section with guidance on procedures for each section of the cutting notice. Please refer to the attachment for evidence of training:</p>  <p>2013_14_CAR_Close out.docx</p>
<p><b>SCS review</b></p>	<p>SCS confirmed that training conducted in 2014 covered this requirement for NHI data and that there have been no new hires since the last training. SCS confirmed that more NHI trainings are planned for 2015 and open to DNR and the public. During a review of training records, as all as interviews with MFL staff and certified plan writers in the field, SCS confirmed that they all had participated in these training programs.</p>
<p><b>Status of CAR:</b></p>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Upgraded to Major  <input type="checkbox"/> Other decision (refer to description above)</p>

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

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

<p><b>FME response</b> (including any evidence submitted)</p>	<p>MFL’s regulatory framework is defined in both statute (<a href="#">s. 77.80 Wis Statutes</a>) and administrative code (<a href="#">ch. NR 46 Wis. Admin Code</a>). <a href="#">Ch. NR 46.18 Wis. Admin Code</a>, lists management practices that can be scheduled as Mandatory in the management plan, as well as provides the opportunity to schedule Approved but not mandatory practices in the management plan.</p> <p>As indicated, non-mandatory practices, if prescribed, are included in a landowner’s management plan. Their inclusion typically is based on stated landowner goals for individual stands to achieve a desired future condition. Non-mandatory practices can include a multiple range of practices, or can be just a few, but all are designed to enhance growth rates and species composition of the forest, improve wildlife habitat, improve recreational opportunities, and others as applicable. Non-mandatory practices can be given a specific target year for completion, or can be left up to the landowner’s discretion as to implementation during the enrollment life. As their name implies, non-mandatory practice implementation by a landowner is optional during the length of the MFL order period (25 or 50 years).</p> <p>Unless cost-sharing is involved in implementing non-mandatory practices, WDNR Foresters are not typically aware of completion of non-mandatory practices and do not track them. Some foresters may contact landowners individually to inquire about non-mandatory practices and may track them as time allows, but no policy exists within MFL requiring tracking by WDNR Foresters, nor reporting by landowners of non-mandatory practices. Workload and time priorities influence available opportunities for WDNR Foresters to contact landowners to follow-up on non-mandatory practice completion.</p> <p>WisFIRS includes non-mandatory practices, if scheduled, on each MFL landowner’s management plan. As Certified Plan Writers write nearly all new plans each year, and Cooperating Foresters frequently work with private landowners to accomplish Mandatory practices, those external partners are often more aware if a landowner has completed a non-mandatory practice. As with DNR Foresters, there is no requirement for a CPW or Cooperating Forester to report completion of non-mandatory practices for MFL landowner clients.</p> <p>MFL landowners are provided with the opportunity to self-report application of pesticides on their MFL-enrolled lands. Instructions along with the form are available on-line on the MFL Certification webpage, <a href="http://dnr.wi.gov/topic/TimberSales/mfl.html">http://dnr.wi.gov/topic/TimberSales/mfl.html</a></p> <p>Further information regarding pesticide use and reporting can also be found within the FME Response for Finding Number 2014.7 to address the major CAR issued in 2014.</p>
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Additional Discussion of Prior Evidence Presented

In the 2011 FSC audit, a landowner was found to have applied Simazine (an FSC prohibited pesticide at that date) on his property. The investigation found that the landowner had applied Simazine in 1992 prior to the MFL program becoming FSC certified, and that Simazine has not been applied after the lands were certified. In fact, the investigation found that chemicals had not been applied since 1994.

**1.** In 2012, WDNR conducted an internal audit and determined that WDNR Foresters, who make over 50% of all chemical recommendations to landowners, were approving the application of Simazine on lands in the MFL Certified Group.

**A.** The Forest Tax Program had a conference call for all WIDNR Team Leaders, Area Forestry Leaders and Regional Forestry Leaders to discuss the findings of the 2011 FSC Audit and the preliminary draft of the 2012 MFL Internal Audit. Part of the conference call included the findings on the use of Simazine on lands within the MFL FSC certification group membership.

**B.** Supervisors were required to meet with all WIDNR Foresters and Forestry Technicians who work with MFL administration to ensure that MFL standards are understood, including that Simazine application on certified lands is prohibited. Auditors confirmed that talking points for Team Meetings, Simazine use on non-certified lands, and supervisor follow-ups were documented and detailed.

**2.** A survey was mailed to 392 MFL landowners who had mandatory practices that may include use of chemicals from the years 2009 through 2012. These practices included the following: hand plant, machine plant, direct seeding, seedbed preparation for natural or direct seeding, and preparation for planting. As of May 15, 2012, 198 people returned the survey for a return rate of 50%. Auditors reviewed data and surveys to confirm results as listed below.

**A.** Results found about 64% of all MFL landowners surveyed do not use chemicals for land management practices. Most of those that use them do so in association with management practices such as planting trees or for seeds do not apply chemicals for seedbed preparation or preparation for planting.

**B.** Landowners surveyed indicated that over 50% of recommendations regarding herbicide use were from WIDNR Foresters. Since survey results indicate that WIDNR Foresters make over 50% of all recommendations to landowners regarding chemical use, a concerted effort was made in training WIDNR Foresters in the FSC prohibited pesticide list. Foresters received additional training in where to find information on FSC prohibited pesticides on the WIDNR public web site.

**C.** The WIDNR survey also identified control of invasive species including Buckthorn, Canada Thistle, Pricky Ash, Garlic mustard, Multiflora Rose, and Annosum Root Rot as a purpose of chemical application.

	<p><b>D.</b> Review of survey results indicated that estimates of acreage of specific chemicals used on MFL lands showed a high level of conformance with the use of FSC approved chemicals.</p> <p><b>E.</b> The percentage of landowners likely to apply any chemicals, based on results of the WIDNR survey, was extremely low at approximately 0.3% of total number of landowners. Additionally, acres treated compared over 2010, 2011, and 2012 were also very low at 0.09%, 0.08%, and 0.06%, respectively.</p> <p><b>F.</b> Activities driving chemical application is usually associated with a tree planting, direct seeding, site preparation or release activity in order to regenerate forest lands. Once forest establishment is achieved, chemicals are no longer used and ecological recovery periods extend the duration of the forest rotation for even-aged species, most commonly between 40-60 years for aspen or 80-120 years for pine plantings.</p> <p><b><u>FSC’s Response:</u></b>          After a thorough review of information regarding both the current pesticides program, including monitoring, and the use of enforcement procedures for violations by landowners, auditors concluded that WIDNR is appropriately and adequately monitoring use of pesticides on FSC certified MFL lands including the pursuit of removal of MFL landowners from the FSC certification program when in violation of FSC requirements. WIDNR has in place procedures for removal of lands from the FSC program for violations of FSC’s banned pesticides using a stepped enforcement approach. MFL Tax Law Handbook (HB24505.60), Chapter 60-1 to 60-3 details the Stepped Enforcement process for compliance and enforcement related to the MFL program. During the audit, an enforcement case for a non-pesticide related violation demonstrated procedures used for enforcement and forester provided form used for removal of landowners to be removed from program if unwilling to comply with requirements of the program. The WIDNR uses two forms for removal from the program, the “Departure from MFL Certified Group” and the “Declaration of Withdrawal MFL” forms. They are used as part of the stepped enforcement process which encompasses FSC compliance by group members, including use of banned pesticides. Since the last audit one group member was taken out of the MFL program FSC certification pool since that individual persisted in using a prohibited chemical.</p> <p>Although recognizing that FSC does not allow for any use of banned pesticides, WIDNR’s improvements to their monitoring system have allowed them to assess potential impacts to lands enrolled in under the MFL certification group membership at approximately at about 0.1% per year out of 2,441,260 acres in the MFL Certified Group as of January 31, 2012. These results will enable WIDNR to further refine monitoring efforts and target education, monitoring, and enforcement actions.</p>
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<b>SCS review</b>	Per current statutes, cooperating foresters do not have to enforce non-mandatory practices. It is expected that training that occurred in 2014 on writing plans to the new specifications will help to avoid future incidents of plans that contain significant numbers of non-mandatory practices that may be necessary to fulfill later scheduled mandatory ones. The cutting notice also includes measures to allow for a change in mandatory practices based on current conditions, such as the presence of pathogens.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2014.12</b>	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-US 8.3.a (see also SCS COC indicators for FM, 1.2, 2.3, 5.1 and 5.2).
<p><b>Non-Conformity (or justification):</b> MFL program is not ensuring that all sales documents issued for outputs sold with FSC claims include its FSC Forest Management (FM/COC) code and FSC claim. Some MFL staff are approving mandatory practices using previous versions of the cutting notice with expired FM/COC code and FSC claim. A template contract for forest products sold does not include the FSC claim and includes an expired COC code.</p> <p>Interviewees stated that foresters had been trained in COC; however, COC requirements are not well-understood or implemented. COC training records were requested and not received. The spreadsheet of 'HR Training' that includes for example 'Statewide Cooperating Forester Meeting' (3/27/2014) - 7 hours'; however, this spreadsheet does not include a list of attendees.</p>	
<p><b>Corrective Action Request (or observation):</b> MFL shall ensure that the updated cutting notice forms are used so that its current FM/COC code and FSC claim are being properly communicated to buyers.</p>	
<b>FME response (including any evidence submitted)</b>	<p>On October 13, 2014, an email was sent to all DNR Foresters, DNR Supervisors, Certified Plan Writers and Cooperating Foresters asking them to use the most current cutting notice and report form for all cutting notices that will be submitted from October 13, 2014 forward. The email addressed a series of Frequently Asked Questions (FAQs).</p> <p>This email is being sent to all DNR Foresters, DNR Supervisors, Certified Plan Writers and Cooperating Foresters. Please share with loggers and others as appropriate.</p> <p>Greetings,</p> <p><b>What's it about?</b></p> <p>DNR received several Corrective Action Requests (CARs) as a result of the June 2014 Managed Forest Law (MFL) FSC audit, of which one related to the use of outdated cutting notice and report forms. I am writing to request your cooperation in using the most recent version of the cutting notice and report form that is found on the DNR public web site at <a href="http://dnr.wi.gov/">http://dnr.wi.gov/</a>. Search <i>Managed Forest Law</i>, under Forest tax laws click on <i>Forms and resources</i>. The form has a 2/14 revision date.</p> <p><b>Why is use of the most recent form important?</b></p> <p>The use of the newest forms will help the MFL program stay compliant with FSC and Tree Farm certification standards. This is especially important since the cutting notice and report forms list the FSC and Tree Farm Certificate Numbers and Claims. Forms that do not have the current certification numbers and claims may become problematic for loggers and mill who wish to continue the chain of custody into their finished products.</p> <p><b>When do I need to start using the new form?</b></p> <p>The new form should be used for all new cutting notices that are submitted for approval.</p> <p><b>What do I do with cutting notices and report that were approved on an older version?</b></p> <p>It is not necessary to re-submit cutting notices and reports that have been previously approved on an older form, however you should check with your loggers and mills to make sure that the cutting notice has the correct certificate numbers and claims if the logger and mill will be following through the chain of custody. The current certificate number can be found at <a href="http://dnr.wi.gov/topic/TimberSales/mfl.html">http://dnr.wi.gov/topic/TimberSales/mfl.html</a> and the FSC claim is FSC 100%.</p> <p><b>I have a bunch of forms printed out in hard copy. What should I do with them?</b></p> <p>If the forms that you have printed out do not have a 2/14 revision date you should recycle them. A cutting notice and report form that does not have a 2/14 revision date is an old version and should not be used.</p> <p><b>I've just checked the public web site and still see the cutting notice and report form with a 1/14</b></p>

	<p><b>revision date. What do I do?</b>                  You may need to delete your browsing history if the 2/14 version does not show up on your computer screen. To delete your browsing history you should do the following:</p> <ul style="list-style-type: none"> <li>• On your browser menu, click on <i>Tools</i>.</li> <li>• From the drop down menu, click on <i>Internet options</i>.</li> <li>• Under the <i>General</i> tab, find <i>Browsing history</i>, then click <i>Delete</i>.</li> </ul> <p><b>What if I have more questions?</b>                  Please contact Kathy Nelson at 608-266-3545 or at <a href="mailto:Kathryn.Nelson@Wisconsin.gov">Kathryn.Nelson@Wisconsin.gov</a> if you have questions.</p>
<b>SCS review</b>	<p>In addition to the text above, MFL provided email records to demonstrate that this action was implemented (sent October 13, 2014). As such, this CAR is closed.</p>
<b>Status of CAR:</b>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Upgraded to Major  <input type="checkbox"/> <i>Other decision (refer to description above)</i></p>

## 4.2 New Corrective Action Requests and Observations

<b>Finding Number: 2015.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-US FF 7.1.a.iii.
<p><b>Non-Conformity (or Background/ Justification in the case of Observations):</b>  MFL 01-041-2014 was called a first stage oak shelterwood, but had mostly central hardwood crop trees (ash, elm, maple, white pine, and oak). There are several good reasons for selecting these crop trees, including the size of the tract (22 acres), the presence of invasive species within the stand and on adjacent properties, and that the more loamy soil texture may favor future conditions with greater central hardwood components. The name “first stage oak shelterwood,” however, may not give the group member a good idea of what to expect in this stand.</p> <p>Additionally in MFL 32-002-1993 an overstory removal was scheduled using the rationale of regenerating oak. While some oak seedlings were present in parts of the stand, other areas were lacking in advanced regeneration. Outside of any additional release or site preparation treatments, the stand will likely regenerate to central hardwoods with a small oak component. There is an opportunity to add clarity to silvicultural prescriptions to ensure landowners have realistic expectations on the density of oak regeneration.</p> <p>DNR is in the process of updating the silvicultural handbook and there may be an opportunity to clarify some terminology used.</p>	
<p><b>Corrective Action Request (or Observation):</b> A written management plan should include the description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used.</p>	
<b>FME response (including any evidence submitted)</b>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2015.2</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-US 7.3.a.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> On a marked timber sale on MFL Order #42-035-2003, the marking of green tree retention is not consistent with DNR guidelines (5-15% crown cover; <i>DNR Silviculture Handbook</i> and Appendix A of the <i>Wisconsin Forest Management Guidelines</i> ). As currently marked the residual stand will likely have an average of two trees per acre, which will not meet the minimum retention guidelines. During interviews with the forester responsible for the harvest, it was found that this person was not aware of the leave tree retention requirements of the MFL. The forester is not a certified plan writer or cooperating forester so he may not have had as much exposure to green tree retention guidelines.	
<b>Corrective Action Request (or Observation):</b> Workers should be qualified to properly implement the management plan; all forest workers should be provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

## 5. Stakeholder Comments

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

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources

(e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders in this evaluation:

### 5.1 Stakeholder Groups Consulted

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

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

<input type="checkbox"/> <i>FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.</i>	
Stakeholder comments	SCS Response
<b>Economic concerns</b>	
Deer numbers in some parts of the State are at such high levels that oak regeneration is not possible without fencing.	<p>The audit team confirmed during field visits that deer browse on oak species was limiting regeneration in some areas. Through interviews and site visits that audit team confirmed that oak regeneration remains a challenge on many MFL properties.</p> <p>Reducing the deer herd is out of the control of the certificate holder; however the audit team found that DNR is taking active steps such as launching an online mapping program to inform hunters of locations of MFL properties that are classified as open. Also the DNR plays a key role in implementation of the Deer Management Assistance Program aimed to reduce the herd in select locations.</p>
<b>Social concerns</b>	
The MFL is a very helpful program. The average person is not knowledgeable of good forestry practices. There is a lot of benefit to being in MFL.	<p>Several other group members had similar comments about the MFL program and its benefits. SCS confirmed via interviews with service providers and group members that through the MFL program, forestry professionals and the general public can receive training on DNR’s forest management and conservation systems.</p> <p>In addition to its tax savings for landowners, DNR has conducted an analysis of the impacts of Wisconsin’s forest industry on the <a href="#">regional economy</a>, including some of the impacts of the MFL program. Information on the impact of the forest industry on each county can be found here: <a href="http://dnr.wi.gov/topic/forestbusinesses/factsheets.html">http://dnr.wi.gov/topic/forestbusinesses/factsheets.html</a>. This analysis includes a citation of the methodology used and was prepared by a forest economist. Noted as evidence of conformance.</p>

Environmental concerns	
MFL is a good program to get various species of trees growing and managing the tree species present on the site.	SCS observed that on most sites, MFL group members are working with established regeneration or trying to establish regeneration based on the species present on the site. In cases where the dominant or co-dominant species are not being regenerated in high densities, retention practices ensure that they remain present on site. Noted as evidence of conformance.

## 6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME’s response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p><b>Comments:</b> Given the size and complexity of the MFL program, staff are consistently improving the efficiency of MFL program implementation.</p> <p>Situations that were difficult to evaluate due to unclear FSC policies: Criterion 6.10. FSC-US guidance on restoration or conversion of natural/semi-natural forest stands to non-forest ecosystems, even if those ecosystems are possible on the site, considers that restoration or transformation of forest to grassland meets the FSC definition of conversion. However, in several forested regions on the planet, including the Lake States, Provinces, and Territories of North America, the transition of prairie to forest or savanna (and vice versa) occurs over time and space based on climate and disturbance regimes. FSC considers a common transition zone, savannas, as forested ecosystems. However, this is not the case with prairies. It has been well-documented in research in Wisconsin that prairies now occupy less than 2% of their original range due to land use conversion and that their representation is lacking in the landscape. Guidance in Appendix F of the FSC-US standard would appear to support that some prairie remnants can qualify as HCV2 based on their size and integrity (including disturbance regimes). Wisconsin DNR should consider advocating for addressing the ambiguity over conversion and ecological restoration/ transformation in the current FSC-US standards during the adaptation of the FSC International Generic Indicators (IGI) to the US.</p>	

## 7. Changes in Certification Scope

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

### Name and Contact Information

Organization name	Wisconsin Department of Natural Resources		
Contact person	Mark Heyde		
Address	101 S. Webster St. , FR/4	Telephone	608-267-0565
	PO Box 7921	Fax	608-266-8576
	Madison, WI 53707-7921	e-mail	mark.heyde@wisconsin.gov
		Website	dnr.wi.gov

### FSC Sales Information

<input type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson	Sabina Dhungana		
Address	101 S. Webster St. , FR/4	Telephone	(608) 261-0754
	PO Box 7921	Fax	(608) 266-8576
	Madison, WI 53707-7921	e-mail	sabina.dhungana@wisconsin.gov
		Website	dnr.wi.gov

### Scope of Certificate

Certificate Type	<input type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input checked="" type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input checked="" type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)	38,155 as of January 2015	
Number of FMU's in scope of certificate	47,472 mfl parcels as of January 2015	
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude:	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
<b>Total forest area in scope of certificate which is:</b> Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac		
privately managed	2,567,282	
state managed		
community managed		
<b>Number of FMUs in scope that are:</b>		
less than 100 ha in area	46,879	100 - 1000 ha in area 256
1000 - 10 000 ha in area		more than 10 000 ha in area
<b>Total forest area in scope of certificate which is included in FMUs that:</b> Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac		
are less than 100 ha in area	2,567,282 (0-1,000 ha/ 0-2,471 ac)	
are between 100 ha and 1000 ha in area		
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs		
<b>Division of FMUs into manageable units:</b>		
Managed Forest Law order numbers		

### FSC Data Request

#### Production Forests

<b>Timber Forest Products</b>	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	2,392,755
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a	167,444 (PR, SW and 2/3

combination of replanting and coppicing of the planted stems	PJ
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	2,225,310
<b>Silvicultural system(s)</b>	<b>Area under type of management</b>
Even-aged management	
Clearcut (clearcut size range )	448,250 (A, OX, 1/3 PJ)
Shelterwood	610,839 (PW and O)
Other:	99,099 (BW and MR)
Uneven-aged management	
Individual tree selection	533,702(NH)
Group selection	343,964 (BH, CH and SH)
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Each land owner has their own harvest intervals based on inventory data.
<b>Non-timber Forest Products (NTFPs)</b>	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	Owners may designate productive forest NTFPs not to exceed 20% of total acreage
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	We don't collect data on NTFPs on private lands.
<b>Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:</b>	
Aggregated AAH or NTFB Harvest Rate does not apply to SLIMFs. Harvest intervals are included in the Managed Forest Law Stewardship Plans which use property specific inventory data.	
<b>Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i></b>	
<b>Species</b>	<b>Scientific Name</b>
Aspen/Popple:	<i>Populus tremuloides</i> <i>Populus grandidentata</i>
Balsam poplar	<i>Populus balsamifera</i>
<b>Bottomland hardwoods:</b>	<i>Populus</i>
Eastern Cottonwood	<i>deltoides</i>
Swamp white oak	<i>Quercus bicolor</i>
Siver maple	<i>Acer saccharinum</i>
American elm	<i>Ulmus americana</i>
River birch	<i>Betula nigra</i> <i>Fraxinus</i>
Green ash	<i>pennsylvanica</i>

White birch	<i>Betula papyrifera</i>
Northern white cedar	<i>Thuja occidentalis</i>
<b>Central hardwoods:</b>	
	<i>Quercus</i>
White oak	<i>alba</i>
Bur oak	<i>Quercus macrocarpa</i>
Black oak	<i>Quercus velutina</i>
Northern pin oak	<i>Quercus ellipsoidalis</i>
Black walnut	<i>Juglans nigra</i>
Butternut	<i>Juglans cinerea</i>
Shagbark hickory	<i>Carya ovata</i>
Bitternut hickory	<i>Carya cordiformis</i>
Black cherry	<i>Prunus serotina</i>
Red maple	<i>Acer rubrum</i>
Hackberry	<i>Celtis occidentalis</i>
Balsam fir	<i>Abies balsamea</i>
Eastern hemlock	<i>Tsuga canadensis</i>
<b>Miscellaneous conifers:</b>	
	<i>Pinus</i>
Scotch pine	<i>sylvestris</i>
European larch	<i>Larix decidua</i>
Norway spruce	<i>Picea abies</i>
Eastern redcedar	<i>Juniperus virginiana</i>
Blue spruce	<i>Picea pungens</i>
<b>Miscellaneous deciduous:</b>	
	<i>Acer</i>
Norway maple	<i>platanoides</i>
Boxelder	<i>Acer negundo</i>
	<i>Robinia</i>
Black locust	<i>pseudoacacia</i>
Honey locust	<i>Gleditsia triacanthos</i>
Eastern Hophornbeam, Ironwood	<i>Ostrya virginiana</i>
Musclewood, Bluebeech	<i>Carpinus caroliniana</i>
<b>Northern hardwoods:</b>	
Sugar maple	<i>Acer saccharum</i>

Yellow birch	<i>Betula alleghaniensis</i>
White ash	<i>Fraxinus americana</i>
American beech	<i>Fagus grandifolia</i>
American basswood	<i>Tilia americana</i>
Northern red oak	<i>Quercus rubra</i>
Red Pine	<i>Pinus resinosa</i>
Jack Pine	<i>Pinus banksiana</i>
Eastern white pine	<i>Pinus strobus</i>
Black spruce	<i>Picea mariana</i>
Tamarack	<i>Larix laricina</i>
Black ash	<i>Fraxinus nigra</i>
White spruce	<i>Picea glauca</i>

**FSC Product Classification**

Timber products			
	Product Level 1	Product Level 2	Species
<input checked="" type="checkbox"/>	<b>W1 Rough Wood</b>	W1.1 Roundwood (logs)	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Silver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir, Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musciewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input checked="" type="checkbox"/>		W1.2 Fuel Wood	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Silver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir, Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musciewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input type="checkbox"/>		W1.3 Twigs	
<input type="checkbox"/>	<b>W2 Wood charcoal</b>		

<input checked="" type="checkbox"/>	<b>W3 Wood in chips or particles</b>	W3.1 Wood chips	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Silver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir, Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musciewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input type="checkbox"/>	<b>Other*</b>	Please List:	
Note: If your operation produces processed wood products such as wood pellets, planks, beams, poles etc. please discuss with SCS staff as you may need a separate CoC certificate.			

Non-Timber Forest Products			
	Product Level 1	Product Level 2	Product Level 3 and Species
<input type="checkbox"/>	<b>N6 Plants and parts of plants</b>	N6.1 Flowers	
<input type="checkbox"/>		N6.2 Grasses, ferns, mosses and lichens	
<input checked="" type="checkbox"/>		N6.3 Whole trees or plants	<input checked="" type="checkbox"/> N6.3.1 Christmas trees
<input type="checkbox"/>		N6.4 Pine cones	

**Conservation Areas**

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	HCVF are not designated on private lands, however animals, plants, and habitats of significance are identified through the Natural Heritage Inventory database. This information is used to craft the stewardship plan and design harvesting operations that mitigate disruptions to these elements.
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**High Conservation Value Forest/ Areas**

High Conservation Values present and respective areas:

Units:  ha or  ac

	Code	HCV Type	Description & Location	Area
<input type="checkbox"/>	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		

<input type="checkbox"/>	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
<input type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		
<input type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
<input type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
<b>Total Area of forest classified as 'High Conservation Value Forest/ Area'</b>				0

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

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input checked="" type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
<b>Explanation for exclusion of FMUs and/or excision:</b>	Forest owners establish and manage small (generally less than 1 acre ea.) wildlife food plots from time to time. Although DNR recommends that landowners do not plant GMO corn and soybeans (eg. Roundup Ready®) as wildlife food sources this has been very difficult to track and control. Therefore based on the frequency of food plots found during the 2013 audit the following formula was developed to estimate the total number and area of food plots in the FMUs: number of MFL orders X .082 x 1 ac = number of acres excised; the calculation for 2015 is: 47,472 x .082 x 1 ac = 3892.7 ac	
<b>Control measures to prevent mixing of certified and non-certified product (C8.3):</b>	Food plots are not a source of forest products. There is no risk of mixing certified and non-certified products.	
<b>Description of FMUs excluded from or forested area excised from the scope of certification:</b>		
<b>Name of FMU or Stand</b>	<b>Location (city, state, country)</b>	<b>Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)</b>
Various	Not mapped unless at least 2 ac.	3893

## 8. Annual Data Update

### 8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
# of male workers 297 DNR division of forestry	# of female workers 90 DNR division of forestry	
Number of accidents in forest work since last audit:	Serious: 0	Fatal: 0

### 8.2 Annual Summary of Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year	Reason for use
Transline	Clopyralid		24 acres	
Touchdown	Glyphosate		7 acres	
Unknown	Glyphosate		9 acres	
Roundup	Glyphosate		13 acres	
GLY-4	Glyphosate		7 acres	
Accord XRT	Glyphosate		72 acres	
Accord	Glyphosate		72 acres	
Credit 41 original	Glyphosate		9 acres	
Escort	MetsulfuronMethyl		30 acres	
Oust	SulfometuronMethyl		143 acres	
Oust XP	SulfometuronMethyl		50 acres	
Garlon	Triclopyr		98 acres	
Element 4	Triclopyr		339 acres	
Garlon 4	Triclopyr		268 acres	
Pathfinder II	Triclopyr		45 acres	
Unknown	2,4-D		35 acres	
Crossbow 4	2,4-D		8 acres	
Crossbow	2,4-D		10 acres	
Sporax	Sodium tetraborate decahydrate		30 acres	Stump treatment
CelluTreat	Disodium Octaborate Tetrahydrate		110 acres	Stump treatment
Unknown	Picloram		35 acres	
Chopper Gen2	Imazapyr		48 acres	
Chopper	Imazapyr		72 acres	

## SECTION B – APPENDICES (CONFIDENTIAL)

### Appendix 1 – List of FMUs Selected For Evaluation

- FME consists of a single FMU  
 FME consists of multiple FMUs or is a Group

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

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

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other – please describe
Adams County RMU	SLIMF	Natural	Random sample
Grant County RMU	SLIMF	Natural	Random sample
Juneau County RMU	SLIMF	Natural	Ease of access
La Crosse County RMU	SLIMF	Natural	Random sample
Monroe County RMU	SLIMF	Natural	Ease of access
Vernon County RMU	SLIMF	Natural	Ease of access

### Appendix 2 – List of Stakeholders Consulted

#### List of FME Staff Consulted

Allness, Michele M - DNR (Shelly) <Michele.Allness@wisconsin.gov>;  
 Antwi, Koby – DNR <Koby.Antwi@wisconsin.gov>;  
 Ballweg, Julie – DNR <Julie.Ballweg@wisconsin.gov>;  
 Bell, Dylan – DNR <Dylan.Bell@wisconsin.gov>;  
 Buenzow, MaryAnn – DNR, MaryAnn.Buenzow@wisconsin.gov  
 Courtney, Steve – DNR Steve.Courtner@wisconsin.gov;  
 Crow, Gerald R - DNR <Gerald.Crow@wisconsin.gov>;  
 Delons, Paul – DNR <Paul.Delons@wisconsin.gov>;  
 Dhungana, Sabina – DNR <Sabina.Dhungana@wisconsin.gov>;  
 Edge, Gregory – DNR <Gregory.Edge@wisconsin.gov>;  
 Heyde, Mark A - DNR <Mark.Heyde@wisconsin.gov>;  
 Hutnik, Brad – DNR <Brad.Hutnik@wisconsin.gov>;  
 Jepson, Joel – DNR <Joel.Jepson@wisconsin.gov>;  
 King, Allen – DNR <Allen.King@wisconsin.gov>;  
 Kirschling, Frank A - DNR <Frank.Kirschling@wisconsin.gov>;  
 Lambert, Kristin E - DNR <Kristin.Lambert@wisconsin.gov>;

Martin, Chris – DNR <Chris.Martin@wisconsin.gov>;  
 Mitchell, Greg – DNR <Greg.Michell@wisconsin.gov>;  
 Nichols, Chad – DNR <Chad.Nichols@wisconsin.gov>;  
 Potvin, Nicole R - DNR <Nicole.Potvin@wisconsin.gov>;  
 Schilling, Kevin – DNR <Kevin.Schilling@wisconsin.gov>;  
 Stormoen, Jodi – DNR <Jodi.Stormoen@wisconsin.gov>;  
 Walroth, Christine – DNR <Christine.Walroth@wisconsin.gov>;  
 Warren, James K - DNR <JamesK.Warren@wisconsin.gov>;  
 Weatherly, Jeffrey I - DNR <Jeffrey.Weatherly@wisconsin.gov>;  
 Wilson, Terri – DNR <Terri.Wilson@wisconsin.gov>;  
 Young, Aaron – DNR <Aaron.Young@wisconsin.gov>;  
 Zirbel, Adam – DNR <Adam.Zirbel@wisconsin.gov>

**List of other Stakeholders Consulted**

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Tom Jodarski	Group member	608-847-4979; tmjodarski@yahoo.com	Field Interview	Y
Don Bollig	Bollig Excavating and Forestry Services	DonalBollig@josephbollig.com or DonalBollig@joebollig.com	Field Interview	Y
Phil Sala	Group member	phil.sala@mail.com	Field Interview	Y
Bob Murphy	Group member	608-565-2580	Field Interview	N
Steven Vinopal	Group member	608-547-9675	Field Interview	N
Bethany Polchowski	Consulting forester; Lambert Forest Products, LLC	bpolchowski@lambertforestproducts.com	Field Interview	Y
Jeremy Chiamulera	Consulting forester; Compass Land Consultants	jeremy@compassconsultants.com	Field Interview	Y
Darrin Johnson	Group member representative; Integrys/ Wisconsin River Power	dmjohnson@integrysgroup.com	Field Interview	Y
John and Patty Celek	Group member	john-celek@outlook.com	Field Interview	Y
Fred Hengst	Consulting forester; Central Forestry Consulting	foresterfred@centralforestry.com	Field Interview	Y
Alex Beaurain	Forestry Consulting	--	Field Interview	N
Gene Frietag	Group member	608-312-9890	Field Interview	N
Dalton Bygd	Student trainee; Bell Pole Lumber	dbygd379@uwsp.edu	Field Interview	Y

Joel Steigerwald	Group member	---	Field Interview	N
Owen Johnson	Group member	--	Field Interview	N
John Senn	Group member	--	Field Interview	N
Dan Pubans	Forester, Wolf River Woods	pubanz@frontier.net	Phone Interview	Y
Carl Friedel	Owner- Friedel Logging and Sawmill	--	Field Interview	N
Jim Johnson	Group member	--	Field Interview	N
Laura Delaney	Delaney Logging	--	Field Interview	N
Julian Hutchinson	Consulting Forester	--	Field Interview	N
Charles Mentzel	Consulting Forester	--	Field Interview	N
Charlie Webster	Timber buyer	cwebster@lambertforestproducts.com	Field Interview	Y

### Appendix 3 – Additional Audit Techniques Employed

No additional audit techniques were employed.

### Appendix 4 – Pesticide Derogations

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

### Appendix 5 – Detailed Observations

Evaluation Year	FSC P&C Reviewed
2013	All – (Re)certification Evaluation
2014	2.1, 2.2, 4.2, 5.2, 6.2, 6.3, 6.5, 6.7, 6.8, 6.9, 7.2, 7.3, 8.3 (COC indicators for FMEs).
2015	2.3, P3, 4.1, 4.2, 4.3, 4.4, 4.5, 5.2, 5.3, 5.4, 5.5, 6.10, 7.4, and 8.5.
2016	
2017	

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

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

REQUIREMENT	C/NC	COMMENT/CAR
<p><b>Principle #1: Compliance with Laws and FSC Principles</b>                      Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.</p>		
<p><b>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b></p>		
<p><b>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.</b></p>	NE	
<p><b>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.</b></p>	NE	
<p><b>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.</b></p>	C	
<p><b>2.3.a</b> If <i>disputes</i> 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.  <b>FF Indicator: Low risk of negative social or environmental impact.</b></p>	C	<p>The group manager does not become involved in disputes over tenure or use rights unless there is an enforcement issue over boundaries such as unreported land sales or false reporting of acreage. The group manager reviews tax records on an annual basis to verify any changes in ownership.</p> <p>Refer to site notes in section 2.1 of Section A. Several examples of group members and consulting foresters employing measures to avoid or reduce potential conflicts over property boundaries were observed during the audit. On MFL 01-045-2004, a group member had a survey done after a land sale and boundaries were readjusted using an local arbitrator due to conflict with the neighboring landowner. This was resolved and SCS observed newly marked property boundaries in the field along with the</p>

		surveyor’s markings. Low risk is thus confirmed.
<p><b>2.3.b</b> The forest owner or manager documents any significant disputes over tenure and use rights.  <b>FF Indicator: Low risk of negative social or environmental impact.</b></p>	C	No group members or consulting foresters reported any disputes over tenure and use rights during interviews. On MFL 01-045-2004, MFL staff have copies of the updated survey information in the group member’s file.
<p><b>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</b></p>		
<p><b>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.</b></p>	NA	
<p><b>3.1.a</b> Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.</p>	NA	There are no known claims by any Indian Tribes to lands owned and/or managed by the FME. Tribal group members’ forestlands are considered private and not a part of tribal trust lands, even when located within reservation boundaries, as confirmed via interviews with FME staff. These group members pay property taxes to the state and yield taxes on enrolled parcels. Most counties have a real property list (tax assessor) online that can be used to verify private parcels, including those owned by tribes or tribal members. Examples include the Ho-Chunk, Lac Oreilles, Lac du Flambeaux, Red Cliff, and Mole Lake tribes or bands.
<p><b>3.1.b</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.</p>	NA	
<p><b>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b></p>		
<p><b>3.2.a</b> 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.</p>	C	Tribes have hunting and fishing rights on open MFL lands as does the general public, and some extended hunting and fishing rights within the ceded territories in Wisconsin. Essentially, tribes are subject to the same regulations as the general public on open MFL lands. Through interviews with the DNR tribal liaison, it was confirmed that most tribal concerns on MFL lands relate to the protection of archaeological sites and access to hunting and fishing rights.
<p><b>3.2.b</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.</p>	C	See 3.2.b.
<p><b>3.3. Sites of special cultural, ecological,</b></p>	C	

<p><b>economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</b></p>		
<p>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.</p>	<p>NA</p>	<p>MFL consists entirely of SLIMF FMUs.</p>
<p><b>FF Indicator 3.3.a</b> The forest owner or manager maintains a list of sites of current or traditional cultural, archeological, ecological, economic or religious significance that have been identified by state conservation agencies and tribal governments on the FMU or that could be impacted by management activities.</p>	<p>C</p>	<p>FME consults archaeological databases for each cutting notice issued to check for the presence of archaeological and historic sites. FME staff demonstrated use of the database during the audit for Adams County, which is maintained online. All MFL staff at field sites interviewed were aware of archaeological procedures, as were certified plan writers. There are no other tribal resources that may be affected on MFL lands.</p> <p>On one MFL property, 01-085-1998, the landowner has had some conflict with nearby Ho-Chunk trust heirs that bait bear and enter the property to hunt (it is closed). The local DNR staff are aware of this issue and may follow up with the DNR tribal liaison or local forestry liaisons. This is mostly a personal issue and it has very low negative impacts over the landscape. Through an interview with the DNR tribal liaison, SCS found that some kinds of mediation are available and that there are examples of collaboration between tribal and non-tribal members in other parts of the state. The liaison stated that DNR has had increased interaction with the Ho-Chunk Nation during the last 8-9 months over some general projects, some of which may be MFL related. They have not brought up any concerns to tribal liaison.</p> <p>At the local level, the DNR tribal liaison does not become involved in many landowner-to-landowner conflicts, but the liaison team is receptive to helping with mediation. She stated that the DNR has been working with the Ho-Chunk on other issues and can reach out to the local DNR team.</p>
<p><b>3.3.b</b> In consultation with tribal</p>	<p>C</p>	<p>MFL staff consult with DNR archaeologist to</p>

representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).		determine and implement avoidance measures; logging during frozen conditions or no entering the specific site are typically recommended. Confirmed via interviews with MFL staff, consulting foresters, and group members.
<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.</b>	NA	
<b>3.4.a</b> The forest owner or manager identifies whether <i>traditional knowledge</i> in forest management is being used.	NA	According to interviews with FME staff and group members, no protected traditional knowledge is used in forest management. Any use of NTFPs is not commercial and employs management practices that are either in the public domain (e.g., maple sugaring) or do not constitute protected traditional knowledge (e.g., deer population management). SCS confirmed through observation of management practices that FME does not employ any protected traditional knowledge.
<b>3.4.b</b> When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.	NA	See 3.4.a.
<b>3.4.c</b> The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.	NA	See 3.4.a.
<b>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b>		
<b>4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b>	C	
<b>4.1.a</b> Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry. <b>FF Indicator: Low risk of negative social or environmental impact.</b>	C	Most service providers interviewed (loggers and certified plan writers (CPW)/ consulting foresters) are self-employed. A few are direct employees of a service provider and stated that compensation is similar to what could be earned in similar forestry jobs locally and exceed minimum wage requirements. Low risk is confirmed.
<b>4.1.b</b> Forest work is offered in ways that	C	Certain service providers, such as CPWs, are

<p>create high quality job opportunities for employees.  <b>FF Indicator: Low risk of negative social or environmental impact.</b></p>		<p>allowed to take training courses targeted to the MFL program, and learn about DNR processes and classifications. A student trainee of one forestry consulting firm has had opportunities for First AID/CPR, fire qualifications, and other training. This was confirmed in interviews and low risk is confirmed.</p>
<p><b>4.1.c</b> Forest workers are provided with fair wages.  <b>FF Indicator: Low risk of negative social or environmental impact.</b></p>	C	<p>See 4.1.a.</p>
<p><b>4.1.d</b> Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.  <b>FF Indicator: Low risk of negative social or environmental impact.</b></p>	C	<p>Low risk of negative impact is confirmed; all hiring and conditions of employment must adhere to federal and state regulations based on this indicator. Women forestry professionals from private and DNR sectors were interviewed during the assessment. DNR employees interviewed stated that training on sexual harassment and discrimination is required as a condition of being hired and often is a topic of monthly meetings.</p>
<p><b>4.1.e</b> 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.</p>	NA	<p>FME consists entirely of SLIMF FMUs.</p>
<p><b>FF Indicator 4.1.e: The forest owner or manager, as feasible, contributes to the local community.</b></p>		<p>MFL program is a great contributor to local communities across Wisconsin. The approximate 46,000 MFL certified properties distributed across every county produce timber for the wood markets of Wisconsin and neighboring states. Additionally, the portions of MFL properties that are open to public recreation help provide opportunities for tourism, recreation, and hunting/fishing related commerce.</p>
<p><b>4.1.f</b> 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.  <b>FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)</b></p>	NA	<p>Inapplicable (pertinent requirements incorporated into Indicator 4.1.e).</p>
<p><b>4.1.g</b> The forest owner or manager participates in local economic development and/or civic activities, based on scale of</p>	NA	<p>Inapplicable (pertinent requirements incorporated into Indicator 4.1.e).</p>

operation and where such opportunities are available. <b>FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)</b>		
<b>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b>	C	
<b>4.2.a</b> 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). <b>FF Indicator: Low risk of negative social or environmental impact.</b>	C	Determined low risk due to State and Federal health & safety requirements.
<b>4.2.b</b> The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	C	MFL staff cannot become involved in legal issues, but have worked with local forestry associations to provide these organizations with guidance on legal requirements. These organizations in turn provide group members with timber sale guidance (e.g., “Conducting a Successful Timber Sale,” UWEX GWQ036), sample contracts, and other resources.  During interviews with service providers, SCS confirmed that they had health & safety training required to implement their portions of the harvest plans.
<b>4.2.c</b> The forest owner or manager hires well-qualified service providers to safely implement the management plan. <b>FF Indicator: Low risk of negative social or environmental impact.</b>	C	Given training opportunities and requirements for Cooperating Foresters, CPWs, and loggers (via FISTA and SFI), SCS confirms low risk of negative social or environmental impact.
<b>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).</b>	C	
<b>4.3.a</b> Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests. <b>FF Indicator: Low risk of negative social or environmental impact.</b>	C	Federal and State laws ensure that workers have the right to freedom of association. As confirmed through interviews, there is low risk of negative social or environmental impact since most workers are contractors or employees of contractors from Small-to-Medium-sized Enterprises (SMEs). Many DNR employees are unionized.
<b>4.3.b</b> The forest owner or manager has	C	DNR has internal policies for dispute resolution

<p>effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p> <p><b>FF Indicator: Low risk of negative social or environmental impact.</b></p>		<p>between workers. U.S. labor laws provide adequate protection to confirm low risk for non-DNR workers.</p>
<p><b>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</b></p>	<p>C</p>	
<p><b>4.4.a</b> 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:</p> <ul style="list-style-type: none"> <li>• Archeological sites and sites of cultural, historical and community significance (on and off the FMU);</li> <li>• Public resources, including air, water and food (hunting, fishing, collecting);</li> <li>• Aesthetics;</li> <li>• Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health;</li> <li>• Community economic opportunities;</li> <li>• Other people who may be affected by management operations.</li> </ul> <p>A summary is available to the CB.</p>	<p>NA</p>	<p>MFL consists entirely of SLIMF FMUs.</p>
<p><b>FF Indicator 4.4.a</b> The forest owner of manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations.</p>	<p>C</p>	<p>Social impact assessment are covered by the following WI DNR procedures and guidance documents that are included as components of the MFL management system:</p> <ul style="list-style-type: none"> <li>• Community Goals, Economic Opportunities, and Other People Affected by Management Operations are addressed in the 2010 Wisconsin Statewide Forest Strategy; <a href="http://dnr.wi.gov/topic/ForestPlanning/strategy2010.asp">http://dnr.wi.gov/topic/ForestPlanning/strategy2010.asp</a></li> <li>• Historically significant sites and archeological sites are identified using the Archeological and Historical Database</li> <li>• Public Resources (primarily water) are identified and protected through BMPs for</li> </ul>

		<p>Water Quality</p> <ul style="list-style-type: none"> <li>• Aesthetics- covered under chapter 4 of Forest Management Guidelines.</li> </ul>
<p><b>4.4.b</b> The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.  <b>FF Indicator: Low risk of negative social or environmental impact.</b></p>	C	<p>Interviews with cooperating foresters, CPWs, and group members confirms that most maintain regular communication with neighbors over any timber harvests close to boundaries and that some of them even send letter to neighbors prior to harvesting. Low risk confirmed.</p>
<p><b>4.4.c</b> 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.</p>	C	<p>See 4.4.b. Before a timber harvest can occur, there is a 30 day period for DNR to review the harvest plan that is described in a Cutting Notice. Review includes elements listed in 4.4.a to ensure that adverse effects do not occur.</p>
<p><b>4.4.d</b> For <i>public forests</i>, consultation shall include the following components:</p> <ol style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>3. An accessible and affordable appeals process to planning decisions is available.</li> </ol> <p>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.</p>	NA	<p>MFL does not include any publicly owned or managed FMUs; all ownership and management is considered private.</p>
<p><b>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.</b></p>	C	
<p><b>4.5.a</b> The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	C	<p>Group members, MFL staff, and service providers interviewed did not report any cases of negligent activity on the part of program participants.</p>
<p><b>4.5.b</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</p>	C	<p>Process for voicing and resolving grievances are detailed in the Forest Tax Law handbook. For MFL group members, informal negotiations with affected parties are possible in addition to formal legal processes over cases of substantiated</p>

<p>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.</p>		<p>damages. MFL staff interviewed are aware of communication channels in case a staff members is accused of negligence, such as involving superiors and legal staff. In most cases, MFL staff try to avoid conflicts by adhering to MFL procedures and policies.</p>
<p><b>4.5.c</b> 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. <b>FF Indicator: Low risk of negative social or environmental impact</b></p>	<p>C</p>	<p>As confirmed through interviews with group members and other stakeholders, there is low risk of nonconformance to this indicator due to informal and formal mechanisms available for resolving cases of damages to third-parties as a result of forest management activities.</p>
<p><b>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.</b></p>		
<p><b>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.</b></p>	<p>NE</p>	
<p><b>5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</b></p>	<p>C</p>	
<p><b>5.2.a</b> 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. <b>FF Indicator: Low risk of negative social or environmental impact</b></p>	<p>C</p>	<p>FME’s group certificate was initiated several decades ago to provide a steady supply of wood fiber from private lands to private industry while promoting the maintenance of forest cover and local industry. Through interviews with group members, SCS discovered that most timber harvests are sold to local operators or mills, thus confirming low risk of negative impacts.</p>
<p><b>5.2.b</b> The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.</p>	<p>C</p>	<p>In 2014, WDNR hired four new Forest Products Specialists in the Division’s Forest Products Services Program. They are tasked with a wide spectrum of activities and services with external partners related to forest products marketing and utilization. One of the Specialists has statewide responsibilities, and the other three have regional responsibilities with one assigned</p>

		<p>directly to southeastern WI, and another to southwestern WI, and the third to northern WI. By providing assistance to the wood products industry in Wisconsin, the program seeks to grow jobs and nurture new and novel wood using technologies. The program produces quarterly Wood Marketing Bulletins, does an annual Timber Products Output Survey, maintains an online wood using database, provides education and outreach support, supplies forest inventory data, and promotes sustainable forestry through sustainable business.</p> <p>Also in 2014, the Division of Forestry added and filled a new dedicated position for a Forest Economist. The position will help address ongoing issues and challenges related to economic aspects of forest management on private lands.</p> <p>Several group members use un-merchantable wood for personal use such as for carpentry or firewood, as confirmed through observation of firewood piles and interviews with group members.</p> <p>Through interviews with the forest economist and utilization specialist, it was found that DNR has several state-wide projects. There are three district specialists that work with foresters and cooperating foresters to connect various players in industry and encourage the development of new markets. DNR's target objective has been to promote industry and establish new businesses in Wisconsin, such as biomass and products derived from biomass. DNR is conducting a feasibility study of the supply chain, logistics, and other factors for such projects. There are some investigations into uses for urban wood, such as creating a directory of businesses that have portable sawmills.</p>
<p><b>5.2.c</b> On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.</p>	<p>NA</p>	<p>MFL does not include any publicly owned or managed FMUs; all ownership and management is considered private.</p>
<p><b>5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid</b></p>	<p>C</p>	

<b>damage to other forest resources.</b>		
<p><b>5.3.a</b> Management practices are employed to minimize the loss and/or waste of harvested forest products.</p>	C	<p>As observed on field sites, stumps were low to the ground and tops left in the field. Through interviews with MFL staff and group members, auditors learned that mills communicate desired log dimensions prior to harvest, which was confirmed in the field via evidence of tops and smaller diameter material that did not meet specifications.</p>
<p><b>5.3.b</b> Harvest practices are managed to protect residual trees and other forest resources, including:</p> <ul style="list-style-type: none"> <li>• soil compaction, <b>rutting</b> and erosion are minimized;</li> <li>• residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected;</li> <li>• damage to NTFPs is minimized during management activities; and</li> <li>• techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.</li> </ul>	C	<p>As observed on field sites, directional and/or mechanical felling techniques are used to avoid damage to the residual stand and to soil and water. Winter or late summer harvesting is usually conducted to reduce impacts to vegetation, sensitive sites, soils, and water. No rutting or soil damage that exceeded state BMPs was observed. Most harvesting does not occur near NTFPs such as maples designated for sugaring and mushrooms are often unaffected.</p>
<p><b>5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</b></p>	C	
<p><b>5.4.a</b> 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.</p>	C	<p>See 5.2.b for information on new hires and initiatives. Most recently, the forest economist and team has been working on clustering timber sales on smaller ownerships in hopes of lowering costs for loggers and landowners, as well as to increase options for lower margin sales. There is some discussion of clustering these sales by modifying some of the mandatory practice dates by one to two years to increase the number of available sales. These sales will soon be posted on the Great Lakes Timber Professional Association’s website, pending approval by upper management. In general, the MFL program has been used during economic downturns to keep logging crews busy as certain management practices are mandatory, as confirmed through interviews with MFL staff.</p> <p>DNR’s forest economist prepared a fact sheet in early 2015 on the impacts of DNR, County Forests, and MFL lands on the state economy</p>

		<p>(<i>Wisconsin Forestry Facts: Economic Impact</i>). This fact sheet summarizes the direct effects of the forest products industry on the state’s economy, as well as a summary of the total number of timber sales on MFL group member FMUs.</p> <p>According to the utilization specialist, DNR publishes information on forest product market conditions three times per year. DNR maintains a wood using directory on primary and secondary producers in the state, which is in the process of being updated.</p>
<b>5.4.b</b> The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.		See 5.4.a. MFL is using information on smaller lands to increase options for timber harvesters and land owners that need to meet mandatory practices while still enjoying a profit.
<b>5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</b>	C	
<b>5.5.a</b> 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	MFL open lands provide opportunities for recreational hunting to the general public. All navigable waters (‘wet ankle’ rule) on MFL properties are also open to the public since they are regulated by the state. MFL plans include a general section on the impacts of the forest practices on forest carbon. Implementing BMPs on MFL lands indirectly reduces impacts to water quality and fisheries.
<b>5.5.b</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	For MFL group members, the primary benefits are on open lands. Most game species, such as deer and turkey, are compatible and even depend on forest management for cover and food sources.
<b>5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</b>	NE	
<b>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.</b>		
<b>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</b>	NE	

<p><b>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.</b></p>		
<p><b>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.</b></p>	NE	
<p><b>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.</b></p>	NE	
<p><b>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.</b></p>	NE	
<p><b>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.</b></p>	NE	
<p><b>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</b></p>	NE	

<p><b>prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</b></p>		
<p><b>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.</b></p>	NE	
<p><b>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.</b></p>	NE	
<p><b>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	NE	
<p><b>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</b>  <b>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.</b></p>	C	
<p><b>6.10.a</b> Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>Under the MFL program, group members are allowed to have up to 20% of the FMU in non-productive area. If these areas include areas of forest converted to non-forest, such as food plots, these are excised from the scope of FSC as in some cases they would exceed the 2% limit established in this indicator. Food plots are mapped as part of management plans or cutting notices. DNR provided an update to the certificate scope to document these changes.</p> <p>This 20% includes all area that is unsuitable for forest production and may include non-productive forest areas (e.g., black spruce swamps), critical sites or habitats, rights-of-way, group member designated no management zones, and non-stocked lands as described in the Forest Tax Handbook, p. 20-12 (Unsuitability). Any conversion of forestlands to non-forest use greater than the 20% allowance leads to issuance of corrective action. If a group member does not</p>

		<p>comply, this usually leads to expulsion from the group.</p> <p>It must be noted that not all situations classified as unsuitable per MFL rules qualify as conversion under FSC. Instances of non-productive forests, unmanaged forests, non-stocked stands (e.g., savannas), and forested critical habitats qualify as forestland. In certain situations, ecological restoration of productive forestland to one of these unsuitable forest types would not meet the FSC definition of conversion of forestland to non-forest use.</p> <p>On MFL 29-026-2001, the group member converted less than 1 acre on a 100 acre parcel to a pond, which meets the FSC-US definition of a limited portion (&lt;2% of acreage). Area around the pond was planted with native tree and shrub species, this reducing the overall impacted area.</p> <p>On MFL 29-218-1998, stand 1, a group member wishes to convert a 5-7 acre red pine stand to prairie with no trees on a 40 acre enrollment. This conversion would range from 12.5-17.5% and may not meet the FSC-US definition of a very limited portion. However, native grassland prairies are under-represented in the landscape and the FSC-US standard appears to offer some support for this under Appendix F of the FSC-US standard. Auditors were unable to visit this site to confirm current activities.</p>
<p><b>6.10.b</b> Forest <i>conversion</i> 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).</p>	<p>C</p>	<p>On MFL 29-026-2001, no conversion of HCVs was detected as there are no HCVs in the MFL program. The area was oak-pine, which is very typical of the Central Sands Region.</p>
<p><b>6.10.c</b> Forest <i>conversion</i> 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).</p>	<p>C</p>	<p>On MFL 29-026-2001, the group member stocked the pond with fish and reforested the edges with native species, which will provide diverse wildlife habitat and recreational opportunities. The FMU has no running or standing water, so fishes, amphibians, birds, and mammals may benefit.</p>
<p><b>6.10.d</b> Natural or semi-natural stands are not</p>	<p>C</p>	<p>Conversions from natural forest to plantation do</p>

<p>converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>		<p>not occur on the MFL properties, as confirmed via field observation. Most pine plantations were started well prior to the 1950s and are being managed for natural tree species that sites are capable of supporting and being regenerated using seed-tree, shelterwood, and other techniques that rely on natural regeneration. As such, these stands are classified as natural/ semi-natural based on management practices and stand trajectories.</p>
<p><b>6.10.e</b> 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)</p>	<p>C</p>	<p>All land-use and stand-type conversions are described in MFL plans and/or cutting notices. Converted areas that meet 6.10.a-c may remain within the scope and consist mostly of areas designated for wildlife habitat or food plots. Natural heritage data is reviewed for these areas, thus biodiversity requirements are met. Stand-type conversions are justified based on forest and soil health and other site conditions, land owner objectives, and typically do not qualify as conversion to non-forest use. These areas are evaluated for natural heritage data regardless of stand trajectory, as confirmed via a review of plans and observation in the field.</p>
<p><b>6.10.f</b> Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	<p>NA</p>	<p>Such conversions are not permitted within the MFL program. MFL rules prohibits any activity that would preclude the practice of forestry, with one exemption made for climate or weather towers used for research purposes. In this case, the group member would have to ask for permission prior to construction. Confirmed via interviews with MFL staff.</p>
<p><b>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.</b></p>		
<p><b>7.1. The management plan and supporting documents shall provide:</b> <b>a. Management objectives. b) description</b></p>	<p>C</p>	

<p><b>of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</b></p> <p><b>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></p> <p><b>b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</b></p> <p><b>i) Description and justification of harvesting techniques and equipment to be used.</b></p>		
<p><b>7.1.a</b> The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	<p>NA</p>	<p>MFL consists entirely of SLIMF FMUs.</p>
<p><b>FF Indicator 7.1.a</b> A written management plan exists for the property or properties for which certification is being sought. The management plan includes the following components:</p> <p>i. Management objectives (ecological, silvicultural, social, and economic) and duration of the plan.</p> <p style="padding-left: 40px;">Guidance: Objectives relate to the goals expressed by the landowner within the constraints of site capability and the best available data on ecological, silvicultural, social and economic conditions.</p> <p>ii. Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information.</p>	<p>C</p>	<p>See <b>OBS 2015.1</b>.</p>

<p>Guidance: In addition to stand-level descriptions of the land cover, information in site-level plans may include: landscape within which the forest is located; landscape-level considerations; past land uses of the forest; legal history and current status; socio-economic conditions; cultural, tribal and customary use issues and other relevant details that explain or justify management prescriptions.</p> <p>iii. Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used.</p> <p>iv. Description of harvest limits (consistent with Criterion 5.6) and species selection. Also, description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate.</p> <p>v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).</p> <p>Guidance: Regional environmental assessments and safeguards or strategies to address pest and weed management, fire management, protection of rare, threatened, and endangered species and plant community types, protection of riparian management zones, and protecting representative samples of ecosystems and High Conservation Value Forests may be developed by state conservation agencies. Site specific plans for family forests should be consistent with such guidance and may reference those works for clarity.</p> <p>vi. Description of location and protection of rare, threatened, and endangered species and plant community types.</p>		
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<p>vii. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8.</p> <p>viii. Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected areas in a manner that clearly relates to the forest description and management prescriptions.</p> <p>Guidance: Property level maps for family forests may be simple and efficient to produce, and may cover only the necessary information needed for management to the FSC-US Family Forest Standard. At the group level, if GIS is used coverage should include protected areas, planned management activities, land ownership, property boundaries, roads, timber production areas, forest types by age class, topography, soils, cultural and customary use areas, locations of natural communities, habitats of species referred to in Criterion 6.2, riparian zones and analysis capabilities to help identify High Conservation Value Forests. Group managers may rely on state conservation agencies for complex GIS services.</p>		
<p><b>7.1.b</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).</p>	NA	MFL consists entirely of SLIMF FMUs.
<p><b>FF Indicator 7.1.b</b> Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.</p>	C	See review of CAR 2014.8.
<p><b>7.1.c-7.1.r.</b> FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p><b>7.2</b> 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</p>	NE	

<b>economic circumstances.</b>		
<b>7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</b>	C	
<b>7.3.a</b> 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	See <b>OBS 2015.2.</b>
<b>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.</b>	C	
<b>7.4.a</b> 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	All MFL plans are subject to the Wisconsin Open Record Requests, which means that the general public can request a copy of any plan and monitoring data on file. If it is beyond 50 pages, the group manager is allowed to charge a nominal fee (price per page, and employee’s time). Confidential items are excluded, such as NHI and archaeological data.
<b>7.4.b</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 plans to ensure compliance with this Standard.	NA	MFL does not include any publicly owned or managed FMUs; all ownership and management is considered private.
<b>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.</b>		
<b>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.</b>	NE	
<b>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</b>	NE	

<p>and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</p>		
<p>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."</p>	NE	
<p>8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</p>	NE	
<p>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.</p>	C	
<p>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.</p>	C	<p>All MFL plans are subject to the Wisconsin Open Record Requests, which means that the general public can request a copy of any plan and monitoring data on file. If it is beyond 50 pages, the group manager is allowed to charge a nominal fee (price per page, and employee's time). Confidential items are excluded, such as NHI and archaeological data.</p> <p>See also the report for <i>Wisconsin's Forestry Best Management Practices for Water Quality</i> (2008), which includes monitoring results on water quality for public and private lands.</p>
<p><b>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.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p> <ul style="list-style-type: none"> <li>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</li> <li>b) Forest areas that are in or contain rare, threatened or endangered ecosystems</li> <li>c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)</li> <li>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).</li> </ul>		

## Appendix 6 – Chain of Custody Indicators for FMEs

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

## Appendix 7 – Group Management Program Members



Listing of Certified  
MFL Orders with Appr