Summary of Auditor Findings:

The bottom line conclusion of the SCS audit team, as represented by the absence of any new Major Non-Conformities, is that the Wisconsin DNR’s administration and management of the State Forests and “other state lands” within the scope of the FSC certificate continues to constitute a high level of land stewardship that is demonstrably in conformance with the certification standard. As with prior years’ audits, the ongoing pattern of staff and budget reductions within the Department establishes a tension between what the Department is able to accomplish and what the certification standard requires. To date, the Department has been able to resolve this tension through variations on the strategy of “making do with less” but clearly this approach has its limits. It is our sense that continued reductions in staff and budgets will, sooner rather than later, lead to irreconcilable gaps in the Department’s capacity to operate in conformance with the certification standard.

2.6 New Corrective Action Requests and Observations Resulting from the 2010 Surveillance Audit

<table>
<thead>
<tr>
<th>Background/Justification:</th>
<th>In order to assure a more permanent solution to the requirement for adequate training in the use of pesticides on lands managed by the DNR, complete the creation of the Department-wide pesticide use team which, in turn, must develop revised Manual Code language regarding pesticide use training requirements.</th>
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<tbody>
<tr>
<td>Minor CAR 2010.1</td>
<td></td>
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<tr>
<td>Deadline</td>
<td>2011 Surveillance Audit</td>
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<tr>
<td>Reference</td>
<td>FSC Regional Indicator 6.6.d</td>
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2010 Observations:

Observation 2010.1: There is an opportunity to enhance the robustness (depth and clarity) and operational utility of property-specific land management objectives that have been articulated in response to Major CAR 2009.1.

Observation 2010.2: There is an opportunity to enhance the robustness of management plan implementation, and the reporting thereof, that has been established in response to Major CAR 2009.2.
Observation 2010.3: A more permanent solution for assuring that GMO plant material is not deployed on the lands covered by the certificate would be beneficial (e.g., Manual Code versus Directive

Observation 2010.4: Filling the vacancy in the certification coordinator position detracts would be beneficial in terms of maintaining and enhancing conformity to the certification standard. More generally, continued reductions in staffing levels incrementally increase the risks that the Department will be unable to demonstrate ongoing conformity to the certification standard.

Observation 2010.5: There are opportunities for property managers to better document (and then utilize) the results of annual property planning meetings in which personnel from across divisions meet to establish intended activities for the coming year.

Observation 2010.6: Senior management should continue to encourage foresters to adopt a service mentality when working with managers of properties other than state forests so that harvesting prescriptions are more fully responsive to property managers’ habitat management objectives.

Observation 2010.7: Conformance to rutting policy, while sufficient to constitute compliance with the standard, could be more consistent.

Observation 2010.8: On the part of field foresters, there could be better uptake and utilization of new structural retention guidelines for even-aged harvesting prescriptions.

Observation 2010.9: It would be beneficial for senior management to clarify how Act 166 applies to properties that have a master plan that is considered to still provide relevant direction and guidance, especially in circumstances where master plan guidance does not call for commercial timber harvesting.

2.7 Certification Decision Resulting from the Annual Surveillance Audit

Based upon information gathered through site visits, interviews, and document review, SCS concludes that management of the WI DNR administered State Forests and “Other Lands” continues to be in sufficient overall conformance with the FSC Principles and Criteria, as elaborated by the Lake States Regional Standard. That is, the SCS audit team has concluded from this annual audit that the DNR’s forest management program is in general conformance with FSC Principles 1 through 9 (Principle 10 is not applicable as the State Forests are classified as “natural forest management” under the FSC definitions). As such, we conclude that continuation of the WI DNR FSC-endorsed forest management (FM) certificate is