

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

Wisconsin Department of Natural Resources

Managed Forest Law Tree Farm Group

Wisconsin, USA

SCS-FM/COC-004622

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Sustainable Forestry Certification Coordinator

<http://dnr.wi.gov>

CERTIFIED	EXPIRATION
01/Dec/2018	30/Nov/2023

DATE OF FIELD EVALUATION

10-14 August 2020

DATE OF REPORT FINALIZATION

12 November 2020

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Foreword

Cycle in annual surveillance evaluations				
<input type="checkbox"/> 1 st annual evaluation	<input checked="" type="checkbox"/> 2 nd annual evaluation	<input type="checkbox"/> 3 rd annual evaluation	<input type="checkbox"/> 4 th annual evaluation	<input type="checkbox"/> Other (<i>expansion of scope, Major CAR audit, special audit, etc.</i>):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
Wisconsin Managed Forest Law Program (MFL), Wisconsin Department of Natural Resources (WIDNR), Division of Forestry (DOF)				

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual evaluations 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 evaluations are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope evaluation would be prohibitive and it is not mandated by FSC evaluation protocols. Rather, annual evaluations 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 evaluation);

Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this evaluation; 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 evaluation.

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 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 evaluation. Section B contains more detailed results and information for required FSC record-keeping or the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

Auditor name:	Shannon Wilks	Auditor role:	FSC lead auditor
Qualifications:	Shannon Wilks has over 28 years of professional experience in the forest industry. His roles have included procurement, supply chain management, contract negotiations and environmental management compliance. His experience includes 20 years with a global forest products company where he spent most of his career in the southern United States. He has also managed industrial properties with land management functions. Mr. Wilks is a Controlled Wood Senior Lead Auditor for FSC® Chain of Custody, Lead auditor for Sustainable Forestry Initiative (SFI®) Chain of Custody Standard, SFI® Fiber Sourcing, SFI® Forest Management Standard, Programme for the Endorsement of Forest Certification (PEFC®) Chain of Custody Standard and a Lead Auditor for Sustainable Biomass Program (SBP). Mr. Wilks is a graduate of Louisiana Tech University with a Bachelor of Science-Forest Management degree. Member of Texas Forestry Association and Texas Accredited Forester #158.		
Auditor name:	Michelle Matteo	Auditor role:	ATFS lead auditor
Qualifications:	Michelle Matteo, FSC/SFI/PEFC/ATFS Senior Lead Auditor, Arborist, Wildlife Biologist, and Forester. Michelle L. Matteo, is qualified as a Senior Lead Auditor to conduct Forest Management, Procurement, and Chain of Custody audits under the Forest Stewardship Council, PEFC, ATFS, and the Sustainable Forestry Initiative Standards. Michelle is a forester and arborist, based in Southern New England, and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Certification. She has over 13 years of experience as an auditor. She has conducted hundreds of Forest Management, Fiber Sourcing, and Chain of Custody audits for companies at all levels of the supply chain and different manufacturing processes, and completed a 3-day ISO 19011 training designed & presented in relation to the FSC Standards. She has a background in urban and traditional forestry, wildlife biology, and watershed science, and has experience with both state and federal environmental regulations. Michelle earned her MS in Forestry and BS in Wildlife & Fisheries Biology, both from the University of Massachusetts.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation:	5
B. Number of auditors participating in on-site evaluation:	2
C. Number of days spent by any technical experts (in addition to amount in line A):	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up:	4
E. Total number of person days used in evaluation:	14

1.3 Standards Used

All standards used are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS's Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS's COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC-US, V1-0.
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V8-0
	<input checked="" type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

Date: 10 August 2020, Monday through 14 August 2020		
FMU/Location/Sites	Activity/Process and Location to be Audited and Site Notes	Auditor
10 August 2020 1:00 pm Madison Office	Opening Meeting: Meet with Central Office Staff for preliminary Opening Meeting <ul style="list-style-type: none"> • Client update / discuss changes to the Facility Record Sheet (contact information, billing information, review scope, etc.) • Review of ATFS Independently Managed Group (IMG) Certification Standards 2015-2020 Selections • Management System Review • Overview of Logo or Label use • Introductions, Roles, and Audit Objectives • Review audit scope, procedures & agenda, intro/update to ATFS and NSF standards and protocols, review of previous CARs/OBS • Overview by your staff of program 	Michelle Matteo (MM) ATFS lead auditor and Shannon Wilks (SW) ATFS team auditor
	<ul style="list-style-type: none"> • Start document and record reviews - this will continue as needed at any office visited during the audit. See previous page for the list of records/documents offices should be prepared to provide upon request. • Review of the activity completed over the past 3 years. • Confirm Site Selection and travel routes for the WI-MFL South Region, comprised of the following Counties: 	MM & SW

	Columbia, Crawford, Dane, Dodge, Grant, Green, Green Lake, Iowa, Jefferson, Juneau, Kenosha, La Crosse, Lafayette, Marquette, Milwaukee, Monroe, Ozaukee, Racine, Richland, Rock, Sauk, Vernon, Walworth, Washington, Waukesha, Waushara <ul style="list-style-type: none"> Add in any active sites 	
4:30 pm	Daily debriefing	
Date: 11 August 2020		
7:30 – 8:00 AM	Abbreviated opening meeting with Selected Field Offices <ul style="list-style-type: none"> Staff introductions and overview Confirm travel routes 	MM & SW
9:00 am	Field site visits – South Region – Auditors to split into 2 teams to cover planned sites	
4:30 pm	Daily debriefing	
Date: 12 August 2020		
7:30 – 8:00 AM	Abbreviated opening meeting with Selected Field Offices <ul style="list-style-type: none"> Staff introductions and overview Confirm travel routes 	MM & SW
8:00 am	Field site visits – South Region – Auditors to split into 2 teams to cover planned sites	
4:30 pm	Daily debriefing	
Date: 13 August 2020		
7:30 – 8:00 AM	Abbreviated opening meeting with Selected Field Offices <ul style="list-style-type: none"> Staff introductions and overview Confirm travel routes 	MM & SW
8:00 am	Field site visits – South Region – Auditors to split into 2 teams to cover planned sites	
4:30 pm	Daily debriefing	
Date: 14 August 2020		
8:30 – 12:00 PM Remote (Auditors working from AC Hotel)	Closing Meeting Preparation: Auditors take time to consolidate notes and confirm audit findings.	
12:00 – 1:00 PM	Closing Meeting and Review of Findings: Convene with all relevant staff to summarize preliminary audit findings, potential non-conformities and next steps.	
1:00 PM	End	

WI MFL Field Sites-Day 1

8/11/2020-Shannon Wilks

- 39-008-2017 Harvest Completed 56 Acres. Frozen ground harvesting conditions. Presence of invasive species noted in cutting report. NHI check found turtle and identifies management plan that harvesting only conducted after October 15th to avoid impact during breeding period. RMZ with equipment exclusion zone marked in yellow (faded) and observed. Creek identified on southern boundary. Managed by Cooperating Forester (CF)-Landowner Objective: wildlife, aesthetics with required timber production. Plan written in 2015-2016. Harvesting completed in spring 2019. Lack of frozen ground impacting harvesting in this part of

state. 3-4 weeks of ideal conditions. Prior to harvest, treatment for invasive buckthorn and honeysuckle. Treated with Garlon 4. Observed applicators license #93-18708-014749 expiration 12/31/2020. Reports of usage are maintained and provided to landowner; annual collection submitted to DNR staff. Submitted by CF to Specialist. Confirmed check of FSC prohibited chemical use. MFL utilizes reporting for annual collection. MFL has online submission for landowners that report directly. Review of NHC process confirmed improvement in turnaround from request by Foresters. Initial review conducted by CF; mapped area of concern sent to Tax Law Admin Specialist for more detailed review: results then returned to CPW within hours/day. NHC charges but MFL has worked through process to minimize cost and improve time response. Observed oak wilt harvest area with goal to regenerate with early succession aspen: observed minimal aspen but good regen of oaks; maple and ash. High deer population on sale: Basal Area requirement within RMZ was known by CF during interview. CF confirmed access to WI BMP electronically. Next generation check scheduled for 2024. ATFS inspector and WCF Wisconsin Consulting Foresters: write 60% of FM plans. Country Forest Products harvested sale-No check of FISTA records by CPW, assumption that all mills require FISTA training. Updated Land Exam 6/2019.

2. 39-023-2012 Harvest Completed 20 Acres-Red pine thinning. NHI and Archaeological check confirmed no presence but mentions if Lupine found to avoid. Cutting notice observed and matched ground conditions. MFL plan originated in 2012. No evidence of chemical stump treatments. Harvest completed in 2019. Purchased by Weekly Timber and Pulp. Forester on staff that is CPW. Basal Area target 120; BA checks-120, 120 and 120. No evidence of spills; no damage to residual stand, no evidence of hydrocarbon spills. Sale completed in summer 2019. No boundary issues-adjacent lands different timber type, 2 roads and same landowner. Interview with landowner confirmed no complaints or issues with MFL process. Overall pleased with process and forest management operations. Updated Land Exam 10/2019.
3. 70-044-2013 Harvest Completed 19 acres. Entered MFL in 2013. CPW plan written. Cutting notice approved 2/17. Logging contractor harvested sale (FISTA) trained. Contract cooperating forester set sale up and completed groundwork. Shelterwood with aspen coppice harvest. Target in shelterwood was 50%. crown cover retention with leave trees marked orange. Observed aspen regeneration and shelterwood with adequate crown retention. NHI checked in 1/17 with no elements recorded for sale area or habitat. Limited harvesting after October 15. KBB note for no removal of lupine if observed. No cultural hits from WI historical society-primitive use of maps and work with archaeologist. Management Plan: landowner objectives wildlife, recreation, and periodic timber income. Landowner hunting of whitetail deer. Invasive buckthorn observed on trail access. Invasive presence identified on 2017 Cutting Notice. **Last Land Exam 1/1/2012 and not updated after FM activity.** Sale worked on over 2 winters; Adjoining sale owned by same landowner. Active in WisFirs for both. Volumes received in March but COVID restrictions have delayed inspection close out. Landowner is aware. Hand planted spruce in some of open areas. Recommendation given after closing out recon. Based on conversation with Tax Law Specialist. Well-defined RMZ along Pine River. No evidence of equipment within buffer.
4. 70-022-2018 Harvest Completed 56 Acres. Observed RMZ along Pine River with adequate size and no equipment observed in zone. Same landowner as 70-044-2013.
5. 70-026-2016 Harvest Completed 65 Acres. Entered MFL in 2016; Shelterwood with 50% of crown cover to remain. Yellow painted reserve trees. On some areas may have less crown due to Aspen. Cutting report signed And closed 2018. Land Exam updated in 1/2019. NHI indicated KBB habitat with notice observed. Archaeologist or cultural no occurrences. Harvest boundary outside 100 Ft RMZ. Harvested by Logging contractor. Invasive species identified on land exam. Survival check scheduled for 2022. Landowner objectives: Property tax relief, hunting: proper timber harvesting and improvement of land.
6. 70-049-2003 Harvest Completed 34 Acres. Interview with landowner-diversity on property. North side turning into prairie. Total acreage is 36 with 2-acre exclusion. Thinning of red Pine completed in 2019. Purchased by logging contractor. Basal area target on Cutting Report target 120. Basal Area checks: 80, 130

and 140. Landowner major objective is management for wildlife. Final cutting notice signed March 2010. **Last Land Exam dates 1/1/08.** COVID restrictions have prevented final close out of sale. Interview with landowner confirmed **NO REPORTING** of chemical use. Confirmed use of Remedy to control Buckthorn. Observed lupine and pollinator area cleared for planting by material-one side is food plot and other side is prairie. Food plot cleared for wildlife. Prairie Nursery purchases herbicides and planting material-apple trees, lupine and other pollinator seeds. LO discussed habitat diversity has a goal for his property. Very dedicated and passionate about managing his land. New member of Woodlands Owner Association.

7. 70-043-2017- Alternate-Re=enrolled property in 2017. ATC installed transmission line and removed 2-3 rows young (pre-merchantable) volume: landowner approaches fishery to utilize material as fish crib/habitat. Other potential was donating to campgrounds for firewood. Sale not closed. Cutting notice filed in January 2018. Final cutting notice submitted to landowner but not returned. Land exam updated 5/2016.

08/11/20-Michelle Matteo

Stop 1: 13-014-2004

Harvest – 18 ac group selection, patch selection, single tree selection to promote future stand growth. Harvest occurred in Stands 11, 13, 15, & 17. Dry or frozen conditions required for harvest.

Oak and walnut were primary species removed, providing space of the remaining species of hardwoods to grow, particularly walnut. Harvest is mostly a follow-up to the harvests done in 2012 & 2014 when a lot of low quality trees and pulpwood was removed. Aspen patch viewed.

Land exam not updated; foresters rely on CPW to communicate the certification information to Landowners (LO).

Garlic mustard, buckthorn and honeysuckle present, WI-MFL forester (Tax Law Forestry Specialist – TLFS) informs the LO how to treat the invasives, if cost share money is available, LO works with that other WI-DNR forester.

Cutting report was not initially signed off on in 2017, as harvest was not completed according to the cutting notice. Post-harvest TSI needed to be completed, letter sent to the LO with additional practices to be completed, including cutting all remaining blue-marked trees, as well as the aspen, and locust, as noted in the cutting plan. Rutting on trails and roads was also required to be addressed.

LO completed the required elements of the cutting plan and it was closed out in Spring of 2018 by the FTLS. After close-out, site looks good with regen growing well.

Stop 2: 13-015-2004

Harvest complete 29 acres harvest (44 ac MFL)

Prior harvest was previously in Stand 1,2,4, more than 3 years ago. Limited BMPs on existing skid trail near public road, however no problems seen. Discussion with TLFS on-site if future harvests use the historic road, that additional BMPs will be installed.

Stop 3: 25-015-2017 No Activity

TSI projects are the future practices, no harvests recommended in the near future.

Some invasives present. Last harvest was 2004, aspen regen was spotty, Invasive plant control for the oak. Plan calls for an oak thinning in 2023 over 15 ac in Stand 4.

CPW who wrote this FMP is no longer a CPW, likely spray for invasives/undesirables first, then thin in next year.

Excellent variety of species on the stand, may try to cultivate more oak, but truly is a mixed hardwood stand.

Discussion of herbicide application and who can/will apply them on-site - Integrated foresters go through applicator licensing, for chemical use, they check the online list of approved chemicals.

WI-DNR has default staff person to collect info from the online-landowner reporting mechanism for chemical usage – it is unclear if landowners are aware of this reporting mechanism.

Stop 4: 25-028-2015

31 ac, No activity - 2019 harvest is past due, bottomland hardwoods - patch selection harvest. No activity at this time. Pushed out harvest 5 years & revisit at that time, as stocking is not quite at what it needs to be for a harvest. Potential to do some PCT in advance of the harvest.

Discussion on-site about the process for a new enrollee to the MFL program and when and how TLFS would go on-site if a mandatory practice is not needed for some period of time.

Stop 5: 53-024-2017, harvest complete.

122.1 acres MFL – LO, consultant forester and herbicide applicator present

Stand 10 - Completed logging in 2017, existing road was repaired by the LO via their roads contractor, and new road constructed in spring of 2018. Old trail has held since 2018, but is starting to degrade - will address as needed, per interview with LO and LO forester.

5 cutting reports covered multiple stands – TLFS in April 2018, sent letter to LO for mandatory follow-up work to be completed in order to ensure that successful regeneration becomes established (TSI and invasive species control), as well as trails work for successful closeout (road and trail work, including out-sloping, water bar installation, and seeding). WisFIRS notes show work has been completed.

Stand 17 - deer browse is an issue with hunting being used to control populations. LO allows 40 people to hunt on property, annually about 40 deer harvested (do provide food plots on non-MFL acres). Closed land, word of mouth for hunters to be on the property and Youth hunt is annual. Permits for the hunts are allocated at the State level by WI-F&G. CWD is about present in approx. 50 % of the population, owner tests all harvested deer. Regeneration is variable in locations, as there is another practice scheduled for 2028, will evaluate existing regen in advance of that harvest. Informal regen checks occur at more frequent intervals.

Forester is a fan of gap selection and is recognized as a FISTA “in-woods professional”. Logger used is FISTA trained.

If issues in the woods (such as illegal logging or dumping), LO and/or forester notify adjacent landowner and or forest ranger and bring in MFL forester as needed.

Auditor queried what the process is for a spill, responses were that if it was a reportable spill, amt depends on the fluid. BMP book in forester’s truck, consultant forester would expect a first aid kit, hard hats, ears, eyes, fire extinguishers to be present.

Spray contractor present – Sprayed Element 4 – 20% mixed with diesel fuel for invasives. Spray contractor maintains his own records, but has never been asked to provide the spray records. Applicator will provide application records to MFL forester for review for the audit. **The LO, consulting forester, and spray contractor were all unaware of the mandatory reporting of pesticide use needed for FSC.**

Stop 6: 53-047-2014, WD Retreat harvest complete 56 acres MFL

LO present for site visit. Consultant Forester that managed the harvest was not present, harvest plan and maps are very detailed. NHI hits, search performed in Dec 1, 2017 with hit for musket, gray rat snake, moist cliff community, pine relic community, & bald eagle. Due to this - No harvest in stand 4 because of cliff communities & NHI hits, harvest timing restriction applied for snake presence.

Logged 2 years ago, finished in April of 2019. Excellent working relationship with TLFS. **LO was not fully aware of what certification means, but will ask the TLFS if questions come up.**

LO completed road repair, finishing touches remain, well done closeout.

Small to large patch cuts viewed, retention of select trees. Timber purchased by local co, requesting certified wood (FSC 100%). LO objectives met, harvesting older decaying trees, increasing wildlife habitat (deer) and species diversity of wildlife and trees.

Some limited rutting on one trail. Excellent trail system around property. Main landing was well-closed out and in good condition. LO may follow-up with invasives treatment for multiflora rose where present (presence was observed, but not in large amounts). LO applied the DNR trail mix for some trails and has used cost-sharing for TSI work, primarily for ironwood removal. Land exam updated and harvest closed April 2019.

Stop 7: 53-029-2018, harvest complete

Harvest occurred over the span of 2 Orders, as the prior MFL entry expired (53-027-1993) before the mandatory harvest was completed, land was re-enrolled.

204 acres total, harvest in 95 ac of that, Area 1 - OSR/salvage, Area 2 - OSR
 2 threatened birds - with harvest restriction, winter cut, 1 threatened snail - out of harvest area.
 Good road in, open nonproductive patch/stand on top. Good retention of desirable stems. Consultant forester managed the sale and wrote the CN. Logger is FISTA trained. Harvest timing restricted until after Aug 31 due to bird nesting restrictions. Trees maintained near rock/boulder outcrops in order to protect the listed snail species.
 Harvest was delayed a bit to wait until a forester was found who would wait for a good market to harvest and sell. Some invasives present, noted in CN. Dry fall cut would be best, but small acreage, so piggy-backed on nearby MFL harvests to maximize utilization and receive better price for logs for the LO. No issues viewed. Letter viewed from Feb 2018 that required TSI and trail work are mandatory, scheduled per WisFIRS and site visit.

WI MFL Field Sites-Day 2

8/12/2020-Shannon Wilks

1. 42-003-2017 73 Acres-FM 2017 entry-re-entry. Wildlife and timber income objectives. Cutting notice finalized 6/12/17. No NHI or Cultural occurrences. No chemical use reported. Invasive species- Minimal buckthorn and honeysuckle. No SMZ or RMZ on site. Land Exam executed 11/17/2015. **NO LAND EXAM AFTER harvesting completed in 2017.** Current Tax Law Specialist inherited this sale. Sale consisted patch selections and harvest cuts. Regeneration was targeted for oak and aspen. No regeneration checks performed. Only checks are for areas of concern with higher deer populations. Regeneration mandatory check is placed WisFirs based on interview. Next entry planned until 2038. Defined boundaries with timber-type change. **Interview with Tax Law Specialist indicated no further reporting of chemical use if landowner reports, documents are placed in file.**
2. 42-013-2013 No Activity-40 acres, Cutting Notice (1-year expiration)is open but no activity. FM plan written 2013. 2 NHI concerns but no habitat on site. No Archaeological hits. No invasive identified. No AMZ or water on sale. Observed red marked red pines marked by landowner. DNR not contacted but observation of harvesting during audit observation. TL Specialist indicates not uncommon for no contact. Process communicated was he will get close to expiration of notice and contact landowner. MFL staff will return and verify harvest meets compliance. Cooperating Forester developed cutting notice- Bell Timber Incorporated. No information of logger or certification. No process of verification of qualified professionals confirmed during interview with Tax Law Specialist. Harvesting appears not be completed-evidence of red painted pine observed throughout stand. Landowner goals on FM plan-Timber production, hunting recreation and oak regeneration. Observed landowner installed water bars-correctly installed and performing as designed. Access gated and locked. Observed property boundary marked in blue paint.
3. 42-14-2013 Completed Harvest 157 Acres. Landowner goals on FM plan-Timber production, hunting recreation and oak regeneration. 2 NHI concerns but no habitat on site. No Archaeological hits. No invasive identified. No RMZ or water on sale. Harvested in 2018 range without contacting MFL. No cutting notice was filed. Landowner cut it himself. Tax Specialist decided not to proceed enforcement since harvesting was done properly. Harvest cut with oak regeneration observed. Observed blue painted boundary line. Observed landowner installed water bars-correctly installed and performing as designed. Observed geo textile on road near steep terrain. Land exam dated 10/30/2018. MFL map attached. Access gated and locked. Observed property boundary marked in blue paint.
4. 42-010-2007 160 Acres. Shelterwood to remove canopy for oak regeneration and central hardwood. Consultant set up sale and filed cutting notice on 1/19/2018 and sale closed on 3/19/2019. **Land exam dated 1/1/2006, 1/1/2008 and 1/1/2009.** No water visible on satellite imagery. Sale map lacks details of water-See OFI. TL Forester had electronic copy of WI BMP. Knowledgeable of BMP requirements by utilizing guide. NHI for 3 elemental occurrences with none on site. No archaeological occurrences. No invasive species identified or observed. Observed maps of sale. MFL map of water feature and stand boundary symbols were similar and caused minor confusion during site inspection. Ground conditions

matched FM plan. No entry scheduled until 2038. Access gated and locked. Observed stand boundary marked in blue paint.

5. 42-074-2003 80 Acres Harvested in winter of 2014/2015. Harvest cut. NHI one species of concern but no nesting site found. No archaeological concerns. Invasive Honeysuckle found on ridge trail. Set up by consultant that is retired now. No RMZ or Water on sale. Oak harvest with goal to regenerate oak. Land exam observed dated 2/14/2014-prior to harvest. **No follow up to treatment. TL Specialist commented- Typically don't update since it's oak regeneration.** 25-year plan entered into program in 2002. If renewed, FM plan would be re-written. Observed aspen, cherry, maple and minimal hickory and oaks. New plans have mandatory 5-year regeneration check. New High-Risk category on new forms to capture stands that may need follow-up designated. Landowner objective: healthy timber, income and wildlife habitat. **No land exam post-harvest. Interview with Tax Law Specialist indicated no further reporting of chemical use if landowner reports. Usage is placed in file.**
6. 42-008-2003 Completed 20 Acres-Harvest cut completed 2019. Direct logger sale-landowner contracted directly with logger. No requirement within MFL to utilize trained contractors. TL Specialist unaware of any requirements. No chemical use listed. NHI check-flower listed but noted timing of harvest would not affect lifecycle. No archaeological occurrences. Oak-wilt restriction- no harvesting 4/1-7/15. No SMZ or RMZ on sale. Cut by hand crew. GTR of 2-3 trees per acre. Area around old gravel pit preserved for landowner and no evidence of disturbance. Regeneration plan oak, popple and birch if any. Original plan was shelterwood but not enough volume and no contractors for small volume. Amended cutting notice for harvest cut. Observation of oaks, cherry, and other mixed hardwood species. Water-bars installed on main haul road. Well designed and serving purpose. Some soil movement but no BMP issues. Water-bars placed on steep terrain at correct intervals. Landowner Objective: manage for timber production and recreation. **No land exam available for post-harvest.** Access gated and locked.
7. 42-027-2003 Completed 22 Acres-No chemical use listed. NHI check-flower listed but noted timing of harvest would not affect lifecycle. No archaeological occurrences. Oak-wilt restriction- no harvesting 4/1-7/15. No SMZ or RMZ on sale. Cut by hand crew. GTR of 2-3 trees per acre. Area around old gravel pit preserved for landowner. Regeneration plan oak, poppies and birch if any. Original plan was shelterwood but not enough volume and no market. Amended cutting notice for harvest cut. Observation of oaks, cherry, and other mixed oak species. Water-bars I stalled on main haul road. Well designed and serving purpose. Some soil movement but no BMP issues. Well placed on steep terrain. Objective to manage for timber production and recreation. **No land exam available for post-harvest.**
8. 42-013-2006 Completed 6-acre red pine thinning. Small sale and landowner had to wait on crew working in adjacent property of neighbors. No FM activity on remaining 34-acre site. **Last land exam observed was 6/26/2008.** Several mandatory practices identified within WisFirs for follow up treatments based on FM plan. Cutting notice completed 6/14/19. NHI and Archaeological checks showed no occurrences. Landowner objectives: recreation, wildlife habitat and timber production. No damages observed to residual stand. Access gated and posted. Basal area confirmed target of 120. Understory of oak regeneration observed. Boundary adjacent to road with locked and posted gate.

8/12/20-Michelle Matteo

Stop 8: 12-013-2010, harvest complete 903.54ac

EAB was primary reason for salvage cut in order to remove the ash while it is merchantable.

Harvesting complete March 2020, patch openings look good. Roads adequately closed at harvest close out, per review of close-out forms and forester interview. Large storms in July resulted in significant failures of roads. Site visit on 07/10/20 documented BMPs did not hold and extensive rutting and runoff of sediment occurred, with gullies present in several spots.

Road work not completed yet, letter to the LO dated July 15, 2020, requiring road repairs needed after the ground dries out and before ground freezes in the fall. Waiting until fall storms abate, then allowing BMPs to sit over winter. Landing in field looks good, trail to landing was seeded with DNR mix or trail and road mix. Invasive present, but no treatment noted.

While extensive BMP issues were present, the system of review caught this site's issues. Discussion on-site of BMP installation on erodible soils, due to the level of washout and sedimentation, it was difficult to tell if the BMPs were applied in the best way, although waterbar spacing was completed according to State guidelines. Washouts were GPS'd and provided for documentation where the road work is needed. Harvest monitoring checklist clearly notes that actions are needed.

Stop 9: 12-069-2013, Harvest complete 138.99ac

Cutting notice not filed when cut was completed in 2017. TLFS discovered this when they followed up on the past due practice in 2018, came out and looked at it and added in mandatory practices. Letter sent to LO in Feb 2018 notifying him of the required practices to still complete: St 6 - aspen cut - mandatory practice for TSI by LO for 2020 completion, as not viable for a commercial pulpwood sale and St 8 - same situation as St 6. with mandatory practice for TSI by LO for completion in 2020- however would like to get a pulpwood contractor to come in because of easy access.

LO completed the woody TSI by dropping the larger undesirable stems, and removing the larger amounts of box elder, but he still needs to treat the invasives, primarily honeysuckle, documented in WisFIRS. Planning on using Garlon and likely treating it himself. Regen is in good condition and is primarily box elder, black cherry, hickory.

Stop 10: 12-013-2018, Planting Complete 30.74ac

Underplanting of black walnut & black cherry in Spring 2018. St 2 is where planting occurred over 16 ac where gaps were present. LO planted the seedlings. This particular forester (a long time MFL Forester) likes underplanting. 2000 seedlings in pockets over the 16-ac stand, generally depicted by the circles on the map. 2020 timber harvest & TSI planned, in part to release the planted seedlings. Potential main trail is flagged in orange by LO.

Stop 11: 12-027-2002, Harvest Complete 53ac, Consulting Forester attending

NHI hit for tree dwelling snake, snags and wolf trees maintained for snake, turtle hit was off of the harvested area, down by the river and determined to have no impact. Original harvest revised due to storm damage in 2015, to include salvage areas, in addition to single tree selection-gap creation. Can't distinguish between salvage and gap creation now 2 years later. Salvage volume explains the differences in the estimated and actual volumes on the closed CN, dated May 2018. Wood was pulled up and down depending on location. Old road used for uphill pull, crossed the bottom for the 'downhill' pull. No issues at close out. Follow-up TSI is recommended but not mandatory, documented as a note in WisFIRS, this was a prior mandatory practice and paperwork clearly notes that the LO is aware of the change of the TSI work from mandatory to non-mandatory, updated in the FMP. One non-navigable waterway to be crossed, crossing was not visible during site visit. Road close-out work was completed following the harvests and no non-commercial work was required to complete the practices. Land Exam not updated.

Stop 12: 12-026-2002, Harvest Complete 73ac, Forester Attending

Adjacent to above harvest and 3 cutting notices were filed at the same time, covering the LO's 3 MFL Orders (2 of which are noted here). All above notes apply to this Order as well, as they were contiguous Orders and the cut occurred across all of them. Land Exam not updated.

Stop 13: 22-019-2002

Harvest closed in 2018, group selection and thinning, primarily oak stands, with some aspen.

9 Closed acres in Stands 5 & 6. objective of the harvest is to salvage merchantable trees that will not make it until the next entry, improve the residual stand composition, and get regeneration in gap/patch areas. Stands uphill from the road harvested. Oak wilt timing restriction followed.

Hired forester to mark the sale. Logger that cut it was from Iowa, logger was sued by the landowner after roads washed out in a huge storm, before site close out. Legal process ensued and WI-MFL was not a party to the suit.

Some aspen trees were left and landowner wanted them gone. Landing was on the edge of the field. Funding received from NRCS for some TSI work.

WI MFL Field Sites-Day 3

8/13/2020-Shannon Wilks

All sales/sites reviewed contained FM plan with maps and required NHI and Archaeological checks. No issues were observed regarding violations or BMPs observed. Access was gated and/or posted. No evidence of trespassing was observed on any site.

1. 42-211-1998 No Activity 50 Acres-Observed amendment dates 7/11/2020 form to modify mandatory practice. Red pine thinning from 2021 to 2027. Date moved to coincide with harvest treatment of white pine stand. Small acreage and lack of market due to mill closure (Wisconsin Rapids facility). Stand 2 is 5-acre red pine previously thinned in 2011. Previous NHI in 2011 was plant with work to be conducted during dormant season. No archaeological occurrences identified. No chemical use identified. No RMZ or water features on land. No activity observed. Landowner objectives: wildlife and timber production. Map and ground conditions match FM plan.
2. 42-018-2017 Active site with hand cutting. Cutting notice signed 12/2018. Prescription is thin 30% of accessible red pine based on topography. Harvest oaks with 3-5 leave-trees per acre and avoid cutting or damage to Chestnut trees. No water features within sale. No NHI or archaeological occurrences within stand. Hard hats and saw chaps (required in winter). Spill kit located in truck and observed by auditor. Fire extinguishers located on machinery. FISTA trained but COVID has impacted training and he thinks his is expired. BMP requirements are based on DNR requirements. DNR and landowner furnished maps. Routine and daily toolbox safety talks without formal documents. Praise for DNR Tax Law Specialist. Good working relationship and appreciative. No regulatory actions confirmed during interview. Discussion with truck driver confirmed no certified wood claim being used from sale. Landowner objectives: wildlife and timber production.
3. 42-001-2017 No Activity 680 Acres: Observed stand 10 identified as jack pine, white pine, and mixed oaks. Confirmed no activity-next prescription 2041. Observed stand 12-red pine plantation. Prescription: Under cutting contract since 2018. No activity possibly market-related. Observed stand 19-scattered White Pine sawlog and low-density red pine with no scheduled FM activities. Landowner objectives: maintain healthy forests, timber production and hunting/recreation. Land open to public for hunting, hiking, and other recreational activity. Gated entrances observed at some access points.
4. 29-020-2013 No Activity 53 Acres-purchased 2019. FM plan was written by current Tax Law Specialist as consultant prior to joining DNR for previous owner written effective 2013. Landowners Objective: promote wildlife habitat and protect yellow river lowlands. River splits property and primary upland species is jack and white pine. Lowland species ash, silver maple, birch and aspen. Next FM treatment planned for 2022-Lowland is group selection thinning with small 1/4 to 1/2-acre openings. Upland treatment is clear cut with reserve trees. Gated access observed with hunting cabin and visual buffer excluded as no management activity. NHI lists 3 threaten plants, 1 threatened, and 2 endangered animals. Management for identified items in NHI will be addressed in cutting notice. No occurrences for archaeological check.
5. 29-051-1997 67 acres. Completed red pine and hardwood thinning. Sale completed in 2007. **Sale never closed but Tax Law Specialist discovered and closed in 2019. Land exam last updated 2014.** Information compared on land exam to original data was not changed. No land exam performed after cutting notice final. No water or RMZ on site. NHI or archaeological no occurrences. No invasive identified within FM plan. Observed food plot. No contact with landowner since CPW cooperating foresters handles sale. FM plan expires 2021. Landowner Objectives: maintain mix of hardwood and grow best quality trees for property.

08/13/20-Michelle Matteo

Stop 14: 53-020-2020, 142 acres, inactive

New enrollee - all enrollment documents viewed. LO does not live locally, completed lots of TSI over the years, inactive site. Size class 2. Next entry 2039. TSI can be completed as a non-mandatory practice in the interim - primarily crop tree release (such as girdling), road and trail maintenance.

Cut was relatively heavy last entry, Wisconsin Forest Landowner Grant Program (WFLGP) funds used to help with the TSI.

Stop 15: 53-020-1997, harvest complete 80ac

Stand 8 - 6 ac, Harvest concluded winter 2018, group selection. Primarily group and patch selection targeting mature red oak and releasing northern hardwood species (mainly hard maple). Prior to harvest starting scattered black walnut was marked to be included with the sale per landowner wishes. Walnut marking reviewed and approved by DNR forester. Log landing for the harvest was in old field along public, paved road. Portions of adjacent field were direct seeded with walnut following the harvest. Dry ditch, no water features. NHI hits in the buffer, none in the harvest area.

TSI completed before and after harvest, mostly ironwood removal, with anything damaged during harvest also removed. Good maple regen from prior TSI work and thinning around particularly nice stems. Stands 7 & 8 were harvested, St 7 was less dense than 8, but same species types. N facing slope, rich soils and visible soil moisture in the middle of a gap. Some invasives present, but no chem control here. Good water bars on existing trails. Land Exam not updated; plan is being re-written this year.

Stop 16: 25-017-2019, No activity 216 acres

Posted no hunting. Prior pulp thinning on entire property around 2003. Good historic past management, daughter of enrollee now makes the decisions and lives in another state. Land will likely be split up 5 ways in the future. Thinning/group selection scheduled for 2022 - NHI hits for neotropical birds - will exclude harvest from May 1 thru middle of Aug and also during Oak wilt time, this will likely be fall or winter harvest. Would like to see a min of 2-ac patches in oak areas, could have smaller patches in heavier maple areas.

Stop 17: 25-003-2020, Harvest Completed 50 acres

One of a group of landowners, 5 families that own adjacent Orders and manage their properties in a coordinated fashion. Great cooperators, Goal is to regenerate this and adjoining Orders using patch cuts, rotating harvests over the approx. 900 acres.

On this order, Harvest this winter, mandatory practice completed a few years early, as scheduled for 2023 in plan. cut some walnut & hickory - forester marked the sale, and neighbor skidded it to the field and sold roadside. Stand 12 has 2 ac clear cut, and had herbicide applied. No chemical use reporting has been completed and likely applied by LO. EQWIP funded project also. Planned to plant next spring. Some savannah restoration in the non-productive stands. Some white oak from the mid-1700s on the site and been part of UW-Platteville research project. Also, part of DMAP. Call into the LO to discuss herbicide application, as the usage has not likely been reported.

Stop 18: 25-001-2020, No Activity 53 acres

New enrollee. Next mandatory practice scheduled for 2023, with OSR harvest in Stands 1, 2, 3. Some plantings recently completed with saplings protected from browse by cages. No issues viewed.

Stop 19: 25-007-2020, No Activity 22.25 acres

Re-enrollment of MFL. No activity. Dry wash viewed on SE side. Next mandatory practice scheduled for 2032, with OSR harvest in Stand 24. No issues viewed.

Stop 20: 25-008-2018, 134 acres

Cut was over 3 years ago, 1 bird NHI hit, but no impact, due to the location of the harvest.

Verso traveled a distance down to site and cut this for the aspen in 2018. Excellent regeneration in Stand 1 after 2 growing seasons. Variety of species coming up under the retained white oaks - red oak, burr oak, cherry, excellent green tree retention. Newly established trail in great condition and allows ease of access. Aspen stand has multiple poplar species regeneration, some scattered oaks and cherry also regenerating. Cut coming up in 2024 for patch selection in oak. No issues.

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 reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member 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, interviews, stakeholder comments, and reviewed documents and records. Where consensus among 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

There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies.

Significant changes occurred since the last evaluation that may affect the FME's conformance to FSC standards and policies (*describe*): MFL program coordinator left organization since last surveillance audit. Position was vacant and being administered by MFL Section Chief during surveillance audit. State Covid pandemic restrictions impacted DNR personnel work and travel. Revisions in Forest Tax Program NR 46.02 published in February 2020.

4. Results of Evaluation

4.1 Definitions of Major CARs, Minor CARs and Observations

Major CARs: Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME's response to the CAR within the stipulated time frame.

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

Observations: These are subject areas where the evaluation team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However,

observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

4.2 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation (2018)	1 st Annual Evaluation (2019)	2 nd Annual Evaluation (2020)	3 rd Annual Evaluation (2021)	4 th Annual Evaluation (2022)
No findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
P1					
P2					
P3					
P4					
P5					
P6	Minor 6.5.b OBS 6.5.d	Major 6.5.b Minor 6.5.d Obs 6.7.a			
P7	OBS 7.1.b	Minor 7.1.b			
P8					
P9					
P10					
COC for FM					
Trademark					
Group	Minor 1.4 OBS 2.2 Minor 3.2	Major 3.2 Obs 5.1.ii Minor5.1.vi.	Minor 2.3 Minor 5.1.vi (extended due to Covid)		
Other					

4.3 Existing Corrective Action Requests and Observations

Finding Number: 2019.2	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights.

Non-Conformity (or Background/ Justification in the case of Observations):

2018: Observation 2017.1 was carried over: BMPs for water bar installation were consistently applied across most audit sites in accordance with *Wisconsin's Best Management Practices for Water Quality* (page 53). However, other timber sale areas with on-going or completed harvest activities had slight to minor amounts of water run-off on skid and haul roads within harvest areas, instances of incomplete or insufficient water bars, inadequate gravel installed at road crossings of small intermittent streams, and minor soil compaction. These roads were nonetheless in conformance justifying this finding as an observation.

Examples observed in the field: MFL Order Numbers: 57-095-2004, 57-060-2003, 12-034-2014, 12-016-1996, 12-013-2003, 57-018-2013, 11-015-2005, 57-018-2013, and 37-086-2012. Detailed information for these sites are included in Section 2.1 of this audit report.

2019: Five sites were observed with road BMP issues by all members of the audit teams in differing Counties of inspection. Landowner and CPW interviews identified gaps in implementing and monitoring of BMP requirements, or related Cutting Notice requirements, specifically related to road maintenance and construction.

1. Order # 36-002-2018- No use of water bars on steep haul/skid road. Sale final executed by DNR staff on 1/18/19.
2. Order # 34-035-2014 - Erosion and main dirt road through the stand, slope 35-45 degrees with sedimentation run-off into adjacent wetland. Forester was aware of BMP requirements and described typical practice to address the issue. For this forester common practice included notifying landowner to discuss issue and potential removal from the certification group. However, the erosion was not noted on any inspection documents and there is an apparent gap in when, or if, any additional follow up would have been done such that this issue would have been identified, providing opportunity for correction, outside of an external audit.
3. Order # 69-060-2012 - Cutting notice included in "BMP for Water Quality Prescription" to avoid entering the low-lying swale with heavy equipment. However, at the on-site inspection the permanent, all-season forest road crossed the swale impeding water flow and movement and resulting in sediment deposition in and outside the natural stream flow with ponding in several locations on the road.
4. Order # 21-011-2006 – Some downhill rutting present at site with no waterbars present, small amount of sediment delivery to base of hill on southern edge of stand (no receiving waterbody present). A steep historic woods road, adjacent to the stand in a degraded condition, had insufficient BMPs present. Logger applied limited BMPs to improve the degraded road (logs angled across the road), but historic & current ATV use has moved the material and nullified the BMP application.
5. Order # 21-002-2019 (21-017-1994) - Shiner Lake is adjacent to the Harvest Area. Cutting notice states that buffer of 100 ft. be applied to the lake. On-site visit showed that the buffer is less than 100' near the area that includes the camp, with harvesting occurring within 70-80' of the Lake edge for a distance of approximately 100 lineal ft.

Interviews with multiple CPWs from different state regions expressed concerns about lack of understanding of road BMPs, and other post-harvest inspection needs, by landowners as contributing to future problems related to water quality as included in *Wisconsin's Forestry Best Management Practices for Water Quality*, Chapter 4 (Forest Roads) and 8 (Wetlands).

Corrective Action Request (or Observation):

SCS reviewed the 2018 responses including the 2018 internal audit report and findings and confirmed findings as described above; confirmed that Private Forestry Outreach Specialist was hired, and confirmed by interview with Tax Section Chief that communications with MFL group member landowners will be a focus moving forward. However, given new findings related to water bar installations, this Observation will remain open to confirm implementation and effectiveness of these actions next year.

2017: WIDNR should ensure that the transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes ensuring that erosion is minimized and sediment discharge to streams is minimized.

<p>FME response <i>(including any evidence submitted)</i></p>	<p>2017 Response: 1. DNR made this one of their focus areas of internal MFL review in May of 2018. DNR found that in most cases BMP's for water quality are implemented and implemented correctly. <i>DNR is investigating:</i> • Additional targeted BMP training for WDNR Tax Law Forestry Specialists and particularly in the Driftless region of Wisconsin, • Training opportunities for the contractors who typically install logging road systems. • DNR is also looking at ways to cost effectively communicate with MFL owners to make them aware of the need to address water quality during and after timber harvest operations. 2. The Division of Forestry has hired a communications specialist with a focus on private woodland owners and improving communication with MFL owners has been discussed as an area to be included in her future work plans.</p> <p>2018 response: FME reports they continue to move forward on outreach campaign with MFL landowners. FME reported partnering with Domtar to produce a high-quality trifold brochure on the benefits and requirements of forest certification that will be provided to MFL landowners and made available to members of the public online and at our service centers. This brochure was made available to the audit team during the audit.</p> <p>2019 response: Develop Harvest Monitoring Checklist. Field visits with forest hydrologist on 2019 finding sites. Develop expectations/responsibilities as part of Ch. 21 rewrite and Tax Law Strategy Implementation.</p>
<p>SCS review</p>	<p>2018: SCS reviewed the <i>draft</i> internal audit report findings and confirmed findings as described above under 2017 response; confirmed that new communications specialist has been hired, and confirmed by interview with Tax Section Chief that communications with MFL group member landowners will be a focus moving forward. However, given new findings related to water bar installations (Minor CAR 2018.1), this Observation will remain open to confirm implementation and effectiveness of these actions next year.</p> <p>2019: The 2018 Response did not include follow up information, or completion of DNR Investigation bullet points from the 2017 Response, above. The most recent internal audit, 2018/2019 did detect related non-conformities. In one identified non-conformity there were corrections/mitigations actions taken. However, in the other non-conformity identified, there was no corrective action issued. The prior year internal audit was a Draft document, 2017/2018 and also included internal findings demonstrating system functionality, however there no evidence presented of the implementation of corrective actions resulting from the 2017/2018 internal audit.</p> <p>The current understanding of roles and responsibilities for meeting this CAR is that it is the responsibility of the landowner. This is based on the Forest Management Plan language and <i>Specific group member duties</i>, as included on 21-6 of the <i>State of Wisconsin DNR, Forest Tax Law Handbook</i> 2450.5. Responsibility for carrying this out may be transferred or assumed by CPWs. This understanding was confirmed by MFL Forestry Tax Law Specialists (FTLS) and CPWs. Given the repeated finding of road issues, lack of evidence presented of landowner educational trainings for these topic areas, and insufficient corrections or corrective actions, this finding is upgraded to Minor.</p> <p>2020: Review of 40 field sites confirmed procedures have been developed and implemented to correct previous deficiencies. Review of field sites (refer to Field Site Notes) confirmed the use of water bars that were correctly designed and working effectively. One site confirmed issues, but MFL procedures had identified the problem and action plan had been developed to correct. CAR Closed by field verification during 2020 audit.</p>
<p>Status of CAR:</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>

Finding Number: 2019.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills.
Non-Conformity (or Background/ Justification in the case of Observations): Unable to evaluate this indicator due to lack of inspection of harvest operator on-site during the audit. Evaluation of this indicator requires observation of a forest harvest operations which was unavailable this year due to extremely wet weather. This must be evaluated in 2020.	
Corrective Action Request (or Observation): Group manager must arrange inspection of active forest harvesting operations in 2020 to evaluate this indicator.	
FME response (including any evidence submitted)	Field Verification required.
SCS review	Review of 1 of 40 field sites (only active job) confirmed spill kit maintained on job-site within crew truck. Interview with contractor confirmed knowledge of requirement of reportable amount and also communicated if there should be an issue, notification to Tax Law Specialist would also be done.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
Finding Number: 2019.4	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FF Indicator 7.1.b Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.

Non-Conformity (or Background/ Justification in the case of Observations):

2018: On site/Order # 29-029-2008: Trees marked on the ground were inconsistent with the Cutting Notice (CN), which functions as the silvicultural prescription, and the CN did not match the Forest Management Plan (FMP). The CN describes the prescription for Stand 2 as, "Uneven aged management. Group selection and improvement thinning." The prescription in the land exam and practices report states, "Shelterwood Regeneration Harvest - Preparatory cut". There are supposed to be small and large gaps in the eastern side of the stand, as noted on the map submitted with the cutting notice, (totaling 6 patches) but there was only 1 piece of flagging found and the patches were not delineated adequately on the ground. The trees marked for removal in the sale, did not match the description in the cutting notice. Finally, the description of the stand contained in the FMP was not wholly accurate. This sale was marked, but not yet up for sale. Additionally, if the stream running through the site is to be crossed, a permitted stream crossing must be applied for; also the original cutting notice from 2012 was rejected, as it was considered to be high-grading of the stand. The resubmitted cutting notice was revised and previously marked trees orange cut marks were blacked out for a few trees viewed. On site/Order # 50-008-2009: the proposed cutting practices were noted as "Cut all aspen, ironwood, and trees marked with orange paint." Site inspection by the auditors revealed numerous large aspen and ironwood that were uncut. There were also several trees marked with orange paint that were not cut. Relatively few stumps were found in spite of thoroughly searching the FMU, and it was questionable as to whether the volume reportedly harvested, particularly the volume of aspen, matched the number and size of stumps observed qualitatively.

These were the only sites identified during the audit with this incongruity where implementation did not match either FMP or CN. However, there are enough new steps and procedures in the MFL program resulting in changes of roles and responsibilities related to the new Act 358, and codes currently being crafted, that further review is warranted. The land exam is not recognized as a formal document in the MFL so it was not clear to all auditors how the FMP is being updated. The MFL program would be strengthened by reviewing how Cutting Reports are used to ensure the FMP, CN, and implementation are linked and accurate.

There were 75 sites inspected during the 2018 audit and this was the only site discovered with this disparity between FMP, CN and field set up or harvesting. This finding was determined to be a minor, isolated breakdown rather than a fundamental system failure which justifies grading as a Minor rather than a Major non-conformity

2019: Two new sites were observed with plans that were not updated in a timely fashion to reflect harvest activities. While changes in the silviculture applied may have been justifiable, the record keeping of such as part of the FMP update process was insufficient. See site descriptions for the Order #'s below:

- _Order # 36-014-1999-Stand 4 (15 acre) stand of upland hardwood. Approximately 7 acres of southern part of stand had been harvested for oak release around 2014/2015 by landowner. Stand description on ground did not match management plan documents. No evidence of oak release observed in maps/documents and no delineation of stand 4 noted based on landowner action to release oaks.
- _Order # 69-116-2013- Stand P2 intermediate red pine thinning. Basal Area checks 90-100 BA. Final harvest signed January 2019. BA volume on ground did not match volumes within Land Exam information. Last updated January 2016.

Corrective Action Request (or Observation):

Actions undertaken on the FMU should be consistent with the management plan and be consistent towards achieving the stated goals and prescribed objectives of the plan.

FME response (including any evidence submitted)

Develop SOP for management plan updates as part of Tax Law Strategy Implementation.

SCS review

Findings in field confirmed all practices met with the conditions described in FM Management Plans. Review of 40 field sites confirmed ground conditions met the descriptions and actions identified within Forest Management Plans.

Status of CAR:

- Closed
- Upgraded to Major
- Other decision (refer to description above)

Finding Number: 2019.6	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-30-005, 5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include: ii. Any records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard;
Non-Conformity (or Background/ Justification in the case of Observations): DNR is offering and completing training sessions for forestry staff and was able to confirm verbally attendance by all 34 Tax Law Forestry Specialists, team leaders, and administrative staff for the Agendas and Training sessions provided for review, which was accepted.	
Corrective Action Request (or Observation): Record keeping of these trainings could be improved by documentation of those attending.	
FME response (including any evidence submitted)	2019: Maintain rosters for attendance of section meeting, team meeting, and other internal Tax Law Section training.
SCS review	Review of training records documented for Tax Law Specialist and Certified Plan Writers and Cooperating Foresters observed. Dated and signature attendance records were reviewed. Records were placed on DNR SharePoint site.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2019.7	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-30-005, indicator 5.1.vi. (see also FSC-US indicators 6.5.b and 6.5.d, 8.2.d.1). 5.1.vi. The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include: vi. Records demonstrating the implementation of any internal control or monitoring systems. Such records shall include records of internal inspections, non-compliances identified in such inspections, actions taken to correct any such noncompliance;

Non-Conformity (or Background/ Justification in the case of Observations): Review of internal audits from 2017/2018 did not include evidence of implementation of corrections, corrective actions, or preventive actions. Review of the 2018/2019 did include corrective actions for one identified site issue but the other with identified Minor non-conformity did not describe the planned or implemented corrections. Given lack of evidence for corrections and non-conformities for indicators under 6.5.b (2019.1) and 6.5.d (2019.2) and additional related requirements under 8.2.d.1, this was identified as applicable for group management under this clause. This program has undergone substantial and significant restructuring and personnel changes over the last several years such that some development and articulation for MFL forestry staff work prioritization and collaborations across multiple agencies is still in progress. The overall system and structure of the State of Wisconsin, Managed Forest Law program is functional with competent and qualified staff justifying the grading of this finding as a Minor non-conformity.	
Corrective Action Request (or Observation): Group management must maintain records demonstrating the implementation of any internal control or monitoring systems. Such records shall include records of internal inspections, non-conformances identified in such inspections, actions taken to correct any such nonconformances. The performance of internal audits must include evidence of corrections, implementation and their use as part of continuous improvements to the program.	
FME response (including any evidence submitted)	2019: Update and include internal monitoring checklist in Ch. 21 revision: Pilot implementation of Harvest Monitoring Checklist began in December 2019.
SCS review	2020: Review of 40 field sites confirmed Land Exam is not being updated in a consistent manner within 10-year requirement of keeping management plan up to date (7.2.a) or after forest management activity. Interview with Team Leader confirmed the Land Exam is utilized to update monitoring of prescriptions within WisFirs database. Minor non-conformance 2019.7- Extended for 12 months due to Covid pandemic restriction on travel for DNR personnel. Field work is required to complete land exams. CAR has been reissued as 2020.2
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above)

4.4 New Corrective Action Requests and Observations

Finding Number: 2020.1	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-30-005, 2.3: Group entity staff and Group members shall demonstrate knowledge of the Group’s procedures and the applicable Forest Stewardship Standard.
Non-Conformity (or Background/ Justification in the case of Observations): No knowledge of requirements and reporting of chemical usage by landowners and DNR personnel. Interview with landowners confirmed lack of knowledge in reporting chemical usage and reporting requirements and interviews with personnel confirmed lack of knowledge in reporting requirements. Refer to Field Site Notes for additional evidence.	

Corrective Action Request (or Observation): Wisconsin MFL program shall demonstrate appropriate training for landowners and personnel for the applicable FSC standards related to chemical usage and reporting.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2020.2	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-30-005, indicator 5.1.vi. (see also FSC-US indicators 6.5.b and 6.5.d, 8.2.d.1). 5.1.vi. The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include: vi. Records demonstrating the implementation of any internal control or monitoring systems. Such records shall include records of internal inspections, non-compliances identified in such inspections, actions taken to correct any such noncompliance;
Non-Conformity (or Background/ Justification in the case of Observations): Continuation of Minor CAR 2019.7. Review of internal audits from 2017/2018 did not include evidence of implementation of corrections, corrective actions, or preventive actions. Review of the 2018/2019 did include corrective actions for one identified site issue but the other with identified Minor non-conformity did not describe the planned or implemented corrections. Given lack of evidence for corrections and non-conformities for indicators under 6.5.b (2019.1) and 6.5.d (2019.2) and additional related requirements under 8.2.d.1, this was identified as applicable for group management under this clause. This program has undergone substantial and significant restructuring and personnel changes over the last several years such that some development and articulation for MFL forestry staff work prioritization and collaborations across multiple agencies is still in progress. The overall system and structure of the State of Wisconsin, Managed Forest Law program is functional with competent and qualified staff justifying the grading of this finding as a Minor non-conformity.	

Corrective Action Request (or Observation): Review of internal audits from 2017/2018 did not include evidence of implementation of corrections, corrective actions, or preventive actions. Review of the 2018/2019 did include corrective actions for one identified site issue but the other with identified Minor non-conformity did not describe the planned or implemented corrections. Given lack of evidence for corrections and non-conformities for indicators under 6.5.b (2019.1) and 6.5.d (2019.2) and additional related requirements under 8.2.d.1, this was identified as applicable for group management under this clause. This program has undergone substantial and significant restructuring and personnel changes over the last several years such that some development and articulation for MFL forestry staff work prioritization and collaborations across multiple agencies is still in progress. The overall system and structure of the State of Wisconsin, Managed Forest Law program is functional with competent and qualified staff justifying the grading of this finding as a Minor non-conformity.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

5. Stakeholder Comments

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

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

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.

5.1 Stakeholder Groups Consulted

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. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental

organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

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.

<input type="checkbox"/> <i>FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual evaluation.</i>	
Stakeholder Comment	SCS Response
<p>FSC Forest Management has drastically effected in a very negative way the OHV Trail Recreation Rider’s trail experience along with the hugely inflated cost of developing, and maintaining Wisconsin ATV and UTV Trails. The properties that contain FSC Certified Forests have incorrectly concluded that the only way to provide OHM trails is to add thousands of yards of gravel to the trail surface. The reason forest administrators give is that this practice is required to comply with FSC rules.</p> <p>It is well established that gravel is a very unstable and easily erodible material that has to be constantly replenished and maintained.</p>	<p>Not Applicable-No management of trails on private lands within Managed Forest Law program.</p>
<p>This wide and flat trail surface has increased the severity of accidents that take place on trails, this is caused by the increased rider speed that develops as surfaces are smoothed and straightened out. This lack of twist and turns that slows rider speed have been eliminated therefore speed increases and the severity of accidents drastically increase.</p>	<p>Not Applicable-No management of trails on private lands within Managed Forest Law program.</p>

<p>Another degraded rider experience is the amount of dust that that crushed limestone produces, this decreases the safety of the trail by limiting visibility along with the adverse health effects of breathing in all that dust. The huge increase of adding thousands of yards of gravel to existing trails and the over development of new trails, has increased the cost of trails by an enormous amount. This expense will be ongoing, because of the inherent sheading of this surface material, as trail riding use increases this surfacing material will need to be replenished constantly. These unneeded costs are born entirely by the OHV Trail Recreationist, with no improvement to OHV riders outdoor riding experience. Having a safe and enjoyable riding experience can be provided on a more natural surface, by including those interesting trail surface features such as hills, twist , turns. This will keep riders safe lower costs and provide a sustainable trail experience for forest recreationists.</p>	
<p>NHI data is taken very seriously by the WI DNR and especially in the Managed Forest Law Program. As a WI cooperating forester, I am bound to follow BMPs pertaining to RT&E species on every timber sale that I set up. I do not see evidence of DNR foresters acting in violation of these factors.</p>	<p>Review of site-specific plans cited in field site notes confirms that cooperating foresters and DNR staff review NHI data for MFL properties.</p>
<p>Harvesting can sometimes be seen negatively when viewed</p>	<p>Field site observations confirmed use of sound forestry practices guided by detailed Forest Management Plans and monitoring. All</p>

<p>from a social lens. I find that often times it is due to lack of knowledge regarding the intent of the harvest. Clearcuts do not look good at first, period. Letting a mature aspen stand fall apart, however, is not in the best interest of the public, socially or economically. The managed forest law certified group is a system of checks and balances. DNR oversight is meant to prevent unsustainable harvesting, which is in the best interest of the public.</p>	<p>reforestation requirements within certification standards were confirmed during field site observations.</p>
<p>I do not believe that MFL related forest management activities have adversely affected our organization or local communities. Management that is prescribed in MFL plans is backed by proven silvicultural practices that have historically been effective in the area. I can see how some harvests may be viewed negatively by the community; however, so long as there is proper follow-up, BMP's are properly followed and regeneration goals are met, then it is ultimately good for the overall health of the forest long term. Public land is definitely another story, however, I do not deal with public lands.</p>	<p>Public lands are outside of the scope of this certificate. Field site observations confirmed use of sound forestry practices guided by detailed Forest Management Plans and monitoring. All reforestation requirements within certification standards were confirmed during field site observations.</p>
<p>The recently revised cutting notice approval process seems to have removed some of the teeth from the regulatory abilities of the DNR to prevent impacts on T&E species.</p>	<p>FSC Auditor phone conversation on 8/9/2020 @ 4:15 PM: Largest concern was based on legislative issues and removal of enforcement language from DNR. Referenced specifically Act 358 and removal of approval process. Concern is lack of regulatory authority over protection of vulnerable species and habitats.</p> <p>All field site visits by auditors confirmed all NHI and Archaeological checks and processes were followed during forest management activities.</p>
<p>At times, Tax Law Specialists focus too closely on the deliverable of forest products to</p>	<p>FSC Auditor phone conversation on 8/9/2020 @ 4:15 PM:</p>

<p>market instead of managing healthy ecosystems. Examples of this are where Specialists will hinder the application of prescribed fire due to concerns they have over forest productivity instead of acknowledging benefits added through its application.</p>	<p>Legislative actions in Wisconsin prevent larger use of fire in state. Concerns that wildlife and forestry have conflicting goals and have silo management styles. Praise for DNR and personnel but faulted the legislature and lack of understanding for wildlife and forestry issues. The content of laws is only relevant to FSC in cases in which laws directly conflict with FSC requirements.</p>
<p>However, a couple years ago I sold roughly 475 cord and 20K bdf from a MFL sale I'm part owner in. Not one stick was sold as certified, even when most of the pulp was going to a Verso mill that market their certified products. I don't understand why my MFL sale, supposedly being certified was sold completely unidentified as certified. Continued with my comment below.</p>	<p>MFL Group members are required to include the certification code and claim, SCS-FM/COC-004622 FSC 100%, on sale documents (e.g. timber sale contracts, invoices, haul tickets or scale tickets) related to the sale of their certified timber. One active job was observed during 2020 surveillance audit; job was not delivering certified wood based on interview with contractor and independent truck driver. Records observed confirmed during field visit</p> <p>Timber contracts used for MFL sales identify location information, mills purchasing wood at the stump are responsible for documentation.</p> <p>Review of DNR website confirms certification information is made available to public.</p>
<p>My only complaint as an owner of land in the MFL program, is that nothing has changed. I elected to be certified, but I'd never know it if I wasn't interested. I question the commitment the WDNR Div of Forestry has to promoting certification.</p>	<p>Review of DNR website confirms certification information is made available to public.</p>
<p>Never once has HCVF come up in relation to my plan or harvest. I realize that I likely only have what could be considered a very small amount (forested seep that flows into a larger creek and some component of older hemlock in an otherwise deciduous Maple-Oak-Ash stand). In the DNR Cooperator Foresters or Certified Plan Writers training, I'd like to see certification emphasized (or at least mentioned).</p>	<p>DNR's assessment for HCVF concluded that to-date no HCVF has been identified on MFL properties. The assessment is ongoing because conservation values are assessed on every property at the time of enrollment (plan writing) and prior to timber harvests. The ongoing assessments for HCVF are done through use of the NHI databases, using RTE species guidance (http://dnr.wi.gov/topic/nhi/wlist.html) use of WI DNR Ecological Landscapes http://dnr.wi.gov/topic/landscapes/, as well as observations made by DNR and cooperating service providers.</p> <p>Nevertheless, all field site visits by auditors confirmed all NHI and Archaeological checks and processes were followed during forest management activities. Positive NHI "hits" trigger modification of management practices to avoid impacts to or to maintain and/or enhance the values associated with the species identified, consistent with requirements to FSC Criteria 6.2, 6.3, and 6.4.</p>

<p>Active Managed Forest Law Management has not affected the community. Inactivity or lack of management has.</p>	<p>All field sites inspected contained executed forest management prescriptions as identified within the management plans. Some harvests were delayed due to markets, but process is documented and removal of MFL program is an option for landowners that do not follow management plans.</p>
<p>There is belief that MFL tax incentive is unjustified and not fair. But in reality very few landowners are managing there timber actively and sustainably independently of the MFL program. Local municipalities have little factual understanding of how MFL lands effect the tax role either positively or negatively.</p>	<p>Interview with DNR personnel confirm landowners receive a lower property tax rate for enrollment into the Managed Forest Law (MFL) program. However, management prescriptions must be followed and guidance is outlined within the Forest Tax Law Handbook Document 2450.5 along with additional information available to public on DNR website.</p>

6. Certification Decision

<p>The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME’s response to any open CARs.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Comments: The Covid pandemic restrictions have impacted the DNR and MFL program’s ability to resolve within normal time allotted by FSC. Extension of twelve-months was warranted due to documented impacts on field work and travel restrictions. Only one of forty sites evaluated contained an active harvesting job. Markets were severely impacted due to the recent closure of a large papermill in Wisconsin Rapids. Conformance to FSC standards was observed, documented within procedures and evidenced during interviews with personnel with exceptions noted in CARs.</p>	

7. Annual Data Update

<input type="checkbox"/> No changes since previous evaluation.	
<input checked="" type="checkbox"/> Information in the following sections has changed since previous evaluation.	
<input type="checkbox"/> Name and Contact Information <input type="checkbox"/> FSC Sales Information <input checked="" type="checkbox"/> Scope of Certificate <input type="checkbox"/> Non-SLIMF FMUs <input type="checkbox"/> Social Information	<input checked="" type="checkbox"/> Pesticide and Other Chemical Use <input type="checkbox"/> Production Forests <input type="checkbox"/> FSC Product Classification <input type="checkbox"/> Conservation & High Conservation Value Areas <input type="checkbox"/> Areas Outside of the Scope of Certification

Name and Contact Information

<p>Organization name</p>	<p>Wisconsin Department of Natural Resources</p>		
<p>Contact person</p>	<p>Mark Heyde</p>		
<p>Address</p>	<p>101 S. Webster St. FR/4</p>	<p>Telephone</p>	<p>(608) 220-9780</p>

	PO Box 7921 Madison, WI 53707-7921	Fax	(608) 266-8576
		e-mail	mark.heyde@wisconsin.gov
		Website	https://dnr.wisconsin.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) 220-4531
	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)	37,044 Members (MFL Owners)			
Number of FMUs in scope of certificate	46,276 FMUs (MFL orders)			
Geographic location of non-SLIMF FMU(s)	<i>Latitude & Longitude:</i>			
Forest zone	<input type="checkbox"/> Boreal		<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical		<input type="checkbox"/> Tropical	
Total forest area in scope of certificate:	2,573,581			
Total forest area in scope of certificate which is:	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac			
privately managed	2,573,581			
state managed				
community managed				
Number of FMUs in scope that are:				
less than 100 ha in area	46,064	100 - 1000 ha in area	305	
1000 - 10 000 ha in area		more than 10 000 ha in area		
Total forest area in scope of certificate which is included in FMUs that:	Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac			
are less than 100 ha in area				
are between 100 ha and 1000 ha in area				
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	2,573,581			
Division of FMUs into manageable units:				
Managed Forest Law Order Numbers (i.e. MFL orders) are the FMUs level management units.				

Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
Male workers: # 32	Female workers: # 2	
Number of accidents in forest work since previous evaluation:	Serious: # 0	Fatal: # 0

Pesticide and Other Chemical Use

<input type="checkbox"/> <i>FME does not use pesticides.</i>				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied since previous evaluation (kg or lbs.)	Total area treated since previous evaluation (ha or ac)	Reason for use
Roundup/Accord	Glyphosate		71 acres	Site prep; invasive species control
Dicamba L	Dicamba		54 acres	Invasive species control
Garlon/Tahoe	Triclopyr		349 acres	Release; invasive brush control
Transline	Clopyralid		34 acres	Release
Escort/Patriot	Metsulfuron methyl		0 acres	Site prep
Oust/Spyder	Sulfometuron methyl		38 acres	Site prep; release
Hi-Dep/Patron	2,4-D		0 acres	Site prep; invasive species control
Cellutreat	Disodium Octoborate Tetrahydrate		38 acres	HRD prevention
RotstopC	Plebiopsis gigantea strain VRA 1992		150 acres	HRD prevention
Sporax	Borax		349 acres	HRD prevention

Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
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Total area of production forest (i.e. forest from which timber may be harvested)	2,443,884
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	132,660 Note: Total includes red pine, white spruce and 2/3 jack pine.
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	2,311,224
Silvicultural system(s)	Area under type of management
Even-aged management	
Clearcut (clearcut size range)	452,199
Shelterwood	619,049
Other:	102,731
Uneven-aged management	
Individual tree selection	538,226
Group selection	346,961
Other:	384,718
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	Owners may designate productive forest NTFPs not to exceed 20% of total acreage
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	We don't collect data on NTFPs on private lands.
Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name)	
Refer to prior reports; no changes to species list.	

FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough Wood	W1.1 Roundwood (logs)	All above
W1 Rough Wood	W1.2 Fuel Wood	All above
W1 Rough Wood	W1.3 Twigs	All above
W3 Wood in chips or particles	W3.1 Wood chips	All above
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
N6 Plants and parts of plants	N6.3 Whole trees or plants	Christmas trees

Note: W1, W2, and W3 product groups usually do not require a separate evaluation to FSC-STD-40-004 (COC) if processing occurs in the field for FM/COC and CW/FM certificate types. N1-N10 (NTFPs) are eligible to be sold with FSC claims under FM/COC certification if reported here. Bamboo and NTFPs derived from trees (e.g. cork, resin, bark) may be eligible for FM/COC and CW/FM certification. NTFPs used for food and medicinal purposes are not eligible for CW/FM certification. Check with SCS if you have any products intended to be sold with an FSC claim outside of any of these categories.

Conservation and High Conservation Value Areas

Conservation Area	Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	Conservation areas are not designated on these SLIMF family forests.

*Note: Total conservation and HCV areas may differ since these may serve different functions in the FME’s management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.

High Conservation Value Forest / Areas			Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		
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.		
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
HCV6	Forests or areas critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total area of forest classified as ‘High Conservation Value Forest / Area’			

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

<input type="checkbox"/> N/A – All forestland owned or managed by the certificate holder is included in the scope.		
<input type="checkbox"/> Certificate holder owns and/or manages other FMUs not under evaluation.		
<input checked="" type="checkbox"/> Certificate holder wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
Note: Excision cannot be applied to CW/FM certificates.		
Explanation for exclusion of FMUs and/or excision:	Agricultural food plots are excised*. 3795 acres are excised (food plots @ 1 acre each).	
Control measures to prevent mixing of certified and non-certified product (C8.3):	No forest products are produced on these agricultural acres.	
Description of FMUs excluded from, or forested area excised from, the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input type="checkbox"/> ac)