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**Rainforest
Alliance**

SmartWood Program

Forest Management
2011 Annual audit
Report for:

State of Wisconsin
Department of Natural
Resources
In
Madison, WI USA

Report Finalized:
Audit Dates: September 6 – 12, 2011
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Standard Conversions

1 mbf = 5.1 m³
 1 cord = 2.55 m³
 1 gallon (US) = 3.78541 liters

 1 inch = 2.54 cm
 1 foot = 0.3048 m
 1 yard = 0.9144 m
 1 mile = 1.60934 km
 1 acre = 0.404687 hectares

 1 pound = 0.4536 kg
 1 US ton = 907.185 kg
 1 UK ton = 1016.047 kg

1. INTRODUCTION

The purpose of this report is to document annual audit conformance of State of Wisconsin Department of Natural Resources, hereafter referred to as WIDNR or Forest Management Enterprise (FME). The report presents the findings of SmartWood auditors who have evaluated company systems and performance against FSC forest management standards and policies. Section 2 of this report provides the audit conclusions and any necessary follow-up actions by the company through corrective action requests.

SmartWood audit reports include information which will become public information. Sections 1-3 will be posted on SmartWood’s website according to FSC requirements. All appendices will remain confidential.

Dispute resolution: If SmartWood clients encounter organizations or individuals having concerns or comments about Rainforest Alliance / SmartWood and our services, these parties are strongly encouraged to contact SmartWood regional or Headquarters offices directly (see contact information on report cover). Formal complaints or concerns should be sent in writing.

2. AUDIT FINDINGS AND RESULTS

2.1. Audit conclusion

Based on Company’s conformance with FSC and SmartWood requirements, the audit team makes the following recommendation:	
<input checked="" type="checkbox"/>	Certification requirements <u>met</u>, certificate maintenance recommended Upon acceptance of NCR(s) issued below
<input type="checkbox"/>	Certification requirements <u>not met</u>:
Additional comments:	None
Issues identified as controversial or hard to evaluate.	None

2.2. Changes in FMEs’ forest management and associated effects on conformance to standard requirements:

There have been no significant changes to management planning or staffing the past year. Changes to the number of group FMUs and total area in the group are summarized in the following table.

Change in membership since last audit	Number of FMUs	Acres
New FMUs	1,086	91,107
FMUs Withdrawn	99	4,435

Net Change	987	86,672
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2.3. Stakeholder issues (complaints/disputes raised by stakeholders to FME or SmartWood since previous evaluation):

The following table includes stakeholder comments and SmartWood’s responses.

Comment	SmartWood Response
General MFL Program Comments	
<p>"Timber primacy" - the management for maximum timber production following industrial silvicultural practices takes precedence over other considerations like landowner objectives, ecological forestry, watershed protection, aesthetics, and economics.</p>	<p>This a recurring stakeholder input topic. For past treatment of this question the reader may also reference the 2010 FSC audit report by SmartWood (http://info.fsc.org/PublicCertificateDetails?id=a0240000005sUgFAAU). The 2010 FSC report provides evidence that there are silvicultural conditions requiring both increases and decreases in tree removals for timber and wildlife objectives. The 2010 report ultimately concluded, <i>"In sum, the auditor found the requirement that timber as an objective does not result in non-conformance with the FSC standard. While the program limits the type of landowner objectives that can be accommodated, landowners are made aware of these requirements prior to deciding whether or not to enter the MFL program. Whether or not the MFL program should allow more flexibility in accommodating landowner objectives is a public policy question that is beyond the scope of the FSC standard."</i> This conclusion was re-examined during the 2011 audit and evidence observed in 2011 also supports this conclusion.</p> <p>In addition, during the 2011 audit, SmartWood examined the question in the context of, 1) landscape objectives, and 2) the ability of landowners to pursue alternative management approaches (e.g., select cut versus clearcuts, or vice-versa).</p> <p>The State of Wisconsin has conducted comprehensive state-wide forest assessments and development of strategic directions to support both landscape and stand-level forest sustainability. The MFL program is managed within the context of overarching state-wide frameworks to support forest sustainability and ecological values. June 2010, the State of Wisconsin completed a state-wide forest assessment providing Wisconsin’s Forest Sustainability Framework (Framework). http://dnr.wi.gov/forestry/assessment/framework.htm. The Framework established a series of seven broad criteria and nineteen indicators intended to measure the sustainability of Wisconsin’s forest resources. The Assessment uses the structure of the Framework to gather data around those seven criteria. From this strategic directions were determined. During this process of developing the “Assessment” and “Strategy”, the State of Wisconsin took into consideration other existing statewide plans with the intent to build upon and complement other State natural resource plans and identify opportunities for coordination. One of these state-wide plans is the Ecological</p>

	<p>Landscape Handbook (http://www.dnr.state.wi.us/landscapes). The MFL program has explicitly incorporated actions plans designed to achieve goals outlined in strategic documents. Monitoring the actual contributions of the MFL program towards the included ecological landscape strategic goals is achieved, in part, by volume tracking of removals through mandatory management practices of the program. From the Statewide Strategic Goals document (http://dnr.wi.gov/forestry/assessment/strategy/overview.htm), the WIDNR includes details (definitions and action steps) for the following selected broad goals that contribute to ecological landscape values: 1) the amount of forest land increases and is focused in desired landscapes; 2) The rate of forest land parcelized is reduced; 3) Large blocks of forest are maintained/increase; 4) An increasing amount of land management at small scales is in alignment with landscape scale plans- parcels will be effectively managed forests at a landscape scale that accounts for multiple benefits such as ecosystem services and risks such as wildfire; 5) Deer populations are managed to protect and enhance forest ecosystem functions while considering the full balance of impacts; 6) The spectrum of native and exotic invasive species is being addressed to minimize loss of forested ecosystem functions; 7) Forests are established and managed in a manner that increases their resilience and ability to facilitate adaptation of associated species and communities to changing climatic conditions; and 8) Forests will increasingly be used as a tool to mitigate climate change.</p> <p>Additional monitoring is provided through continuous statewide forest inventory. Acreages of forest types as well other stand data are maintained through a comprehensive system of forest inventory and harvest tracking to assess contributions of the MFL program towards these landscape ecology goals.</p> <p>Interviews with administrative and operational forestry staff demonstrated general understanding of ecological landscape objectives.</p> <p>The State of Wisconsin MFL program has demonstrated continued efforts to appropriately address landscape ecological objectives through the MFL program.</p>
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2.4. Conformance with applicable non conformity reports

The section below describes the activities of the certificate holder to address each applicable non conformity report (NCR) issued during previous evaluations. For each NCR a finding is presented along with a description of its current status using the following categories. Failure to meet NCRs will result in nonconformances being upgraded from minor to major status with conformance required within 3 months with risk of suspension or termination of the SmartWood certificate if Major NCRs are not met. The following classification is used to indicate the status of the NCR:

Status Categories	Explanation
Closed	Operation has successfully met the NCR.

Open	Operation has either <u>not met</u> or has <u>partially met</u> the NCR.
------	--

Check if N/A (there are no open NCRs to review)

CAR 01/10		Reference to Standard: Criterion 5.5 (FSC-US Forest Management Standard 5.5.b)
Non-conformance		DNR's "Management Recommendations for Forestry Practices on Wisconsin's Lake Superior Red Clay Plain" (PUB FR-387 2007), recommends that forests be managed so that no more than 40% of a watershed is in open land or stands that are less than 15 years old at any one time. While the watershed maps supplied by WIDNR indicate that the risk of watershed-scale impacts from the small harvest blocks on the family forest lands covered by this certificate appears to be low, the guidelines are not currently being considered at all in the MFL program. One WIDNR forester was not aware of the watershed-threshold recommendations that would pertain to clearcutting in high-risk watersheds. Another WIDNR forester who was aware of them only applied them in one area that had a watershed management plan, but had not yet considered them for MFL lands in high-risk areas (e.g., near Ashland). While not intended to be WIDNR policy, the auditor found that some of the guidelines are sufficiently specific and supported by WIDNR's watershed database analysis to provide watershed protection in at-risk watersheds consistent with the intent of Criterion 5.5. However, the guidelines are not being considered by WIDNR foresters who are reviewing MFL plans and cutting notice.
Major <input type="checkbox"/>	Minor <input checked="" type="checkbox"/>	
Corrective Action Request: WIDNR shall ensure that forest management operations recognize, maintain, and where appropriate enhance the value of watershed services such as watersheds and fisheries.		
Timeline for conformance:		Prior to next annual audit
Evidence to close CAR:		<p>In the past year WIDNR has taken several steps to increase awareness of the Red Clay Plain guidelines in the Lake Superior Region. These include holding training meetings for private and WIDNR foresters, including the Red Clay Plain guidelines as recommendation in the new Cutting Notice form, and updating Wisconsin's Best Management Practices for Water Quality to include a page specifically focused on water quality management in the Red Clay Plain region. WIDNR will be sending a DVD with maps, GIS layers, and information on managing forests within the Lake Superior watershed to workshop attendees, WIDNR foresters, and consultants in the region.</p> <p>DNR watershed/water quality efforts have not been confined to the Lake Superior basin. In general, WIDNR found a significant improvement in NIPF BMP implementation – over 92% acceptable practices was observed on MFL lands, whereas non-MFL practices were 87% acceptable. However, the BMP monitoring data for last 10 years showed regional differences. The data indicated some problems with BMPs in</p>

	the Driftless Area due to regional soils and slopes. As result, WIDNR has been doing more education there and added area-specific information to the new BMP guide. (While no risk to water quality was observed, the auditors did notice that BMP practices could use improvement in Driftless Area counties included in the 2011 audit. See OBS 01/11). WIDNR has also observed that performance in the Central Sands has not been as strong as the statewide average, and WIDNR has focused educational efforts there.
CAR Status:	CLOSED
Follow-up Actions (if app.):	None

CAR 02/10	Reference to Standard: Criteria and indicator 6.3.a.5 (FSC-US Forest Management Standard 6.3.g.1)	
Non-conformance	<p>MFL guidelines do not require retention of live trees and other vegetation in even-aged regeneration harvests in a manner that is consistent with the characteristic natural disturbance regime for the community type. A recent internal WIDNR memo indicates that this is not a requirement on MFL lands. Amounts of retained vegetation observed varied during the audit. For example, on smaller stands (e.g., 5-10 acres) retention of live trees and other vegetation within and along stand edges appeared to be consistent with the intent of the indicator, but on at least one larger (20 acre) clearcut (Washburn County, O'Neil) retention was limited to two small patches of overstory oak and scattered white pine and no understory vegetation.</p> <p>The auditor reviewed retention guidelines in the revised <i>Forest Management Guidelines</i> (Appendix A-5; revised 2011). A single set of retention guidelines applies to all forest types, and it was not clear how these guidelines are consistent with the characteristic natural disturbance regime of the community type as required by the Indicator. Furthermore, the guidelines are specific to trees and do not discuss retention of "other native vegetation" as required by the Indicator.</p>	
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Major <input type="checkbox"/>	Minor <input checked="" type="checkbox"/>	
Corrective Action Request: When even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation.		
Timeline for conformance:	Prior to next annual audit	
Evidence to close CAR:	WIDNR MFL program provided evidence of policy changes in documentation and field conformance in current management activities on MFL lands. The new policy was distributed appropriately and is comprised of the following language: "Tree retention (also known as "green tree retention") on Managed Forest Law (MFL) lands that are certified under the Tree Farm and FSC group certification is effective immediately. All timber sales and management practices that will be established after this date need to follow the new MFL tree retention guidelines. In short, the changes	

	<p>to the tree retention guidelines are:</p> <ul style="list-style-type: none"> • Tree retention is mandatory for FSC certified lands. • Timber sales ≤10 acres or narrow, linear timber sales are exempt from tree retention guidelines unless desired by the landowner and consistent with sound forestry practices. • Timber sales >10 acres are required to have tree retention unless a lower amount of retention is required to ensure adequate regeneration. Justification of a lower level must be included in the landowner's file in the local WIDNR Forestry Office". <p>These additional guidelines were developed through a Silviculture Team Meeting held on June 28, 2011 (minutes provided). The guidelines were distributed through: 1) an August 3, 2011 email sent to WIDNR personnel that included foresters, team leaders, area forestry leaders, regional forestry leaders, Forest Tax Program staff, cooperating foresters and certified plan writers; 2) an article posted August 19, 2011 in an online WIDNR division newsletter, and; 3) guidance information posted to "Kathy's Korner" a forest tax intranet website. Management activities initiated since the institution of this new policy were observed by auditors to be in conformance in the field.</p>
CAR Status:	CLOSED
Follow-up Actions (if app.):	None

CAR 03/10	Reference to Standard: Criteria and indicator 6.9.b, 6.9.c (FSC-US Forest Management Standard 6.9.b)	
Non-conformance	<p>Administrative Code Ch. NR 40 creates a comprehensive, science-based system with criteria to classify invasive species into 2 categories: "<i>Prohibited</i>" and "<i>Restricted</i>". With certain exceptions, the transport, possession, transfer and introduction of prohibited species is banned.</p> <p>The WIDNR actively educates landowners to the benefits of planting native species over non-invasive exotics. In fact, this educational and applied management work was formalized through the development of a variety of BMP's for Invasive Species efforts. These educational efforts in combination with the aforementioned regulatory activities of actually listing and prohibiting truly invasive species in NR 40 minimize the planting of these non-invasive, exotics on MFL lands a low risk.</p> <p>However, exotic herbaceous species are frequently planted for erosion control or for wildlife food plots, but WIDNR has no monitoring procedure to monitor the effects of exotic species use nor are records kept of the species used and location.</p>	
<table border="1"> <tr> <td>Major <input type="checkbox"/></td> <td>Minor <input checked="" type="checkbox"/></td> </tr> </table>		Major <input type="checkbox"/>
Major <input type="checkbox"/>	Minor <input checked="" type="checkbox"/>	
Corrective Action Request: WIDNR shall ensure that if exotic species are used, their provenance and the location of their use shall be documented and their ecological effects actively monitored.		
Timeline for conformance:	Prior to next annual audit	

Evidence to close CAR:

DNR has addressed this nonconformance as follows:

Documentation of provenance and location of use.

For herbaceous species used for erosion control and wildlife food plots, “provenance” cannot be documented because these species have been grown for decades or hundreds of years in the US. However, the source of the seed (typically the state where grown) is recorded on the seed bag label.

While WIDNR has several avenues to recommend specific seed mixes (and a recommended list is included on the new Cutting Notice form), in most cases WIDNR does not receive a list of which species were actually planted. The person directly responsible for the planting (landowner, logger, or consulting forester) knows the species planted. However, because the person responsible for planting the seed was seldom on site during the audit, the auditors could not confirm if the species were formally “documented” by the landowner or other person responsible for the planting.

In almost all cases the location is identified on the harvest plan map associated with the cutting notice, or the area is mapped as “food plot” on the forest map. However, there are cases where the landowner plants seed outside of an activity approved by, in which case the location may not be “documented,” although it is known to the landowner. For example, one new wildlife food plot observed in Buffalo County was in a forest area (within a recent clearcut); this plot was not known to WIDNR until the field audit. However, WIDNR considers that the risk in such cases is low to non-existent due to the controls of NR 40 (which prohibits sale and planting of listed invasive plants), and because the conservation seed mixes available for sale have been vetted to ensure there are no invasive plants.

Monitoring. Conservation seed mixes typically available for sale are the same mixes used on state and county forest roads and wildlife openings. These plantings are monitored by county and state foresters in the course of ongoing management, and any issues identified there would be shared with MFL foresters as well (many County Foresters that work on FML lands also have county lands duties as well). If any exotic species contained in the mix were found to show invasive qualities Wisconsin would use NR 40 to prohibit their planting.

Food plots were observed on three FMUs with annual crops (e.g. corn, beans, rape, turnips) that were not typical “conservation mixes”. WIDNR staff were not able to identify some of the species planted, but WIDNR is confident that the

	<p>same monitoring that supports NR-40 would ensure that any non-typical crops are periodically reviewed for invasive characteristics.</p> <p>DNR staff monitor approved food plots after they are established to make sure that the size is consistent with the forest management plan approved by WIDNR, but crops and species planted may change in the years following establishment may change, and WIDNR does not have method to monitor these changes.</p> <p>In sum, the audit team found that “documentation” of species and location by one of the responsible parties may not always occur, but risk of invasive species being planted is low due to periodic WIDNR monitoring of the MFL properties when required practices occur. WIDNR invasive species recommendations, education, and the controls of NR-40 provide added protection. Monitoring of species for invasive characteristics occurs on state and county forests and informally through other WIDNR management, and formally through the review process to include plants on the NR-40 prohibited list.</p>
CAR Status:	CLOSED
Follow-up Actions (if app.):	None

2.5. New corrective actions issued as a result of this audit

Major NCR#:	01/11	NC Classification:	Major X	Minor
Standard & Requirement:	FSC-US Forest Management Standard (v1.0), Indicator 6.6.a.			
Report Section:	Appendix IV, 6.6.a.			
Description of Non-conformance and Related Evidence:				
<p>Indicator 6.6.a of the FSC-US Forest Management Standard states that no products on the FSC list of Highly Hazardous Pesticides are used. Simazine, a pesticide on FSC’s Highly Hazardous list, was used in unknown quantities and unknown application coverage.</p> <p>Although systems are in place, firm implementation and monitoring are not evident based on the application of Simazine and other unreported herbicides observed during field audits in 2011. Current systems include policy and educational distributions established and implemented in 2009 in response to similar unreported/unauthorized use of pesticides classified by the FSC as Highly Hazardous (HH) and non-HH pesticides. Efforts in 2009 included mailings to service foresters, cooperating foresters and landowners with links to lists of prohibited pesticides. WIDNR also developed a plan to implement an “annual sampling by mail survey of MFL Group members that have recommended practices that are likely to include pesticide use in 2008. There was no evidence in 2011 that this sampling occurred. Additionally, interviews conducted with landowners during this audit demonstrated that landowners were either unaware of these lists or, in one case, had decided to ignore it.</p>				
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>			

Timeline for Conformance:	By the next annual surveillance audit
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	02/11	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-30-005 v1-0 (Group Certification Standard), 8.2			
Report Section:	Appendix VII, 8.2			

Description of Non-conformance and Related Evidence:

Group Certification Criterion 8.2 requires that the Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.

MFL monitors for conformance with environmental and harvesting rules for site disturbing activities and invasive species control. DCR also samples properties for conformance with USFS Stewardship Plan requirements, but these may not include Group properties and the criteria for that monitoring do not address all FSC requirements. Specific Group entity monitoring gaps identified included:

1. Pesticide monitoring by group manager
 - DNR is not monitoring pesticide use on wildlife food plots within MFL lands. Some food plots observed were intensively managed plots using agricultural techniques. The lack of weeds and typical agricultural practice suggests that herbicides are likely used on these plots. Examples include an MFL entry in Chippewa County where a corn food plot was observed, and another in Clark County where a food crop of annuals (turnips or rape) was observed. Discovered during additional landowner interviews were unreported use of non-hazardous and a prohibited herbicide.
 - In 2009, WIDNR settled CAR 06/08 regarding unauthorized and unreported uses of pesticides with the development of policy and educational information responding to similar unreported/unauthorized use of pesticides classified by the FSC as Highly Hazardous (HH) and non-HH pesticides. WIDNR's efforts included communication with service foresters, cooperating foresters and landowners. In 2009 landowners had received mailings with links to lists of prohibited pesticides but in the interviews conducted during this audit landowners were either unaware of these lists or, in one case, had decided to ignore it.
 - In settling CAR 06/08, WIDNR also developed a plan to implement an "annual sampling by mail survey of MFL Group members that have recommended practices that are likely to include pesticide use. The responses will be used to gauge the effectiveness of a pesticide information and education campaign and conformance to the FSC restrictions and make adjustments as necessary" (2009 audit report, evidence to close CAR 06/08). This sampling has not occurred. It is not clear that county foresters are routinely inquiring about pesticide use when they are in contact with landowners, which was an additional element of the evidence to close CAR 06/8.
2. Safety equipment monitoring use by harvesting contractors. Indicator 4.2.b
 - DNR is not monitoring use of safety equipment by chainsaw operators. Examples include at least 3 active harvest operations where chainsaw operators were not using chainsaw safety chaps.
3. Hazardous spill equipment use by harvesting contractors monitoring by group manager. Indicator 6.7.a.
 - Over 75% of loggers observed or interviewed on field audit sites did not have the equipment necessary to respond to hazardous spills.
4. As evidence to close CAR 12/08 in 2009, WIDNR developed a template for annual internal

monitoring to the FSC standard (at that time the FSC-US Lakes States Standard). OBS 08/09 was issued because the template had not yet been implemented. That monitoring procedure has not been updated to the current FSC standard and has not been implemented.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	By the next annual surveillance audit
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

2.6. Audit observations

Observations are very minor problems or the early stages of a problem which does not of itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed by the client. An observation may be a warning signal on a particular issue that, if not addressed, could turn into a NCR in the future (or a pre-condition or condition during a 5 year re-assessment).

OBS 01/11	Reference Standard & Requirement: FSC-US V1.0, Indicator 6.5.b
Indicator 6.5.b requires that operations meet or exceed Best Management Practices (BMPs) to protect soil, water, and other resource from management operations.	
DNR's monitoring indicates over 92% compliance with BMPs, but some regions present challenges, due to concerns about erodible soils. The revised Best Management Practices for Water Quality now includes a section specific to the Driftless Area . During the 2011 audit in Buffalo County, the auditor observed skid trails without water bars on steep slopes and some soil rutting. The management activity (harvesting) was not complete and there was evidence of plans in place for addressing skid trail issues so NCR was issued, however auditors determine and Observation was appropriate.	
Observation: WIDNR should ensure that Forest operations meet or exceed Best Management Practices (BMPs) that address components of Criterion 6.5.	

3. AUDIT PROCESS

3.1. Auditors and qualifications:

Auditor Name	Rob Bryn	Auditor role	Lead Auditor
Qualifications:	M.S. Forestry, University of Vermont (1984); B.S. Botany and Environmental Studies, University of Vermont (1976). Currently president of Forest Synthesis LLC. Previously employed as Forest and Wetlands Habitat Ecologist/Forester, Maine Audubon (1995 - 2008) Licensed Maine Forester #907. Member SAF and Forest Guild. Certification Experience: FSC auditor since 2003. Lead auditor (SmartWood), including over 55 FSC Forest Management certification audits and assessments in the		

	Northeast, Lake States, and Appalachia, and Southeast US including family forests, investment and industrial forests, managed conservation forests, and public lands. Member of FSC Northeast Standards Committee 1997-2003 and FSC-US national standards advisory committee (2007-2008), peer review of SFI industrial forest certification in Northern Maine, member of state-level forest certification policy committees.		
Auditor Name	Beth Jacqumain	Auditor role	Auditor
Qualifications:	US Region Forest Certification Coordinator. Education: M.S. Forest Biology, School of Forestry, Auburn University, AL. B.S. Forest Management, Department of Forestry, Michigan State University, East Lansing, MI. Experience: Assistant Land Commissioner, Aitkin County Land Department in Aitkin, MN 2005-2010. Oversaw timber management and sales for active forest management program on over 220,000 acres in northern Minnesota. Owner/Operator of ProForestry in 2005; responsible for managing all aspects of company projects. Forester for Rajala Companies in Deer River, MN 1996 – 2004; managing forest inventory activities on company properties, administering company forest inventory databases and planning, supervising and monitoring forest development programs; establishing and developing the company forestry database and database administration. Forestry Cooperative student, USFS, Leavenworth Ranger District, Wenatchee National Forest 1990-1993. Certified Forester (#1467) and member of Society of American Foresters, and the Forest Guild.		

3.2. Audit schedule

Date	Location /Main sites	Principal Activities
8/29-9/4/2011	Off site	Review of FME documents related to the audit
9/6/2011	DNR Service Center, Eau Claire, WI	Opening meeting, review of progress on CARs, Chain of Custody, Group Certification, and other documents.
9/6/2011	Eau Claire County	Review of field conformance with FSC-US standard.
9/7/2011	Eau Claire County, Chippewa County	Review of field conformance with FSC-US standard.
9/8/2011	Dunn County, Clark County	Review of field conformance with FSC-US standard.
9/9/2011	Trempealeau County, Buffalo County	Review of field conformance with FSC-US standard.
9/12/2011	Pepin County	Review of field conformance with FSC-US standard.
9/12/2011	DNR Service Center, Durand, WI	Closing meeting
9/13-9/16/2011	Off site	Follow information review and stakeholder consultation

Total number of person days used for the audit:13.5
= number of auditors participating **2 X** number of days spent in preparation, on site and post site visit follow-up including stakeholder consultation **6.25**

3.3. Sampling methodology:

SmartWood has developed a 4-year annual audit strategy focusing on counties not audited during the 2008 assessment. The 2011 audit focused on the West-Central Region. Field sites within each county were selected from lists of FMU provided by WIDNR, including sites that

had been recently active; were active at the time of the audit; and where management activities were planned. Selection criteria included type of timber harvest activity, other management activities (e.g., herbicide use, planting), forest type, and ecological risk (e.g., presence of streams). Sample sites were geographically clustered within counties when possible to minimize travel time between sites.

A total of 59 forest management units (FMUs) were visited, which exceeds the FSC group sampling requirement of 55 FMUs for this certificate. Sites were selected by the audit team, with some changes made after consultation with WIDNR foresters to ensure that the necessary diversity of FMUs (as indicated by forest type, type of management, and dates of activities) were included. Other adjustments were made to improve travel logistics.

Management plans and cutting notices were reviewed for each site. Additional program administrative documents were also reviewed.

3.3.1 List of FMUs selected for evaluation

FMU Name	Rationale for selection
9/6/2011 – Eau Claire County	
18-003-2000 Carson	Red pine thinning set up but not cut yet. Trees marked by consulting forester. Green tree retention observed
18-011-2011 Smith	Planned oak wilt salvage, jack pine removal, and red pine thinning, Stream Management Zone (SM) protection.
18-013-1991	Red pine row thinning and free thinning in white pine planting completed summer 2011. Both established in 1988 or 1989. Temporary job closure.
18-010-1990 Heike	Series of small clearcuts in oak wilt and aspen patches. Six cuts totaling about 35 acres of a 160-acre stand. Job set up but not marked.
18-019-2006 Carlson	6-acre clearcut in birch-aspen, June 2011. Logger directly contracted with landowner. Ample retention trees of small red maple and cherry. Application of BMPs observed.
18-046-2009 Durest	Clearcut and improvement cut in mixed oak- summer 2011. Discussion about potential regeneration competition from boxelder.
9/7/2011- Eau Claire County	
18-214-1999 Anderson	Aspen clearcut with a hardwood riparian management zone that was select cut, May 2011. Discussion regarding reporting of herbicide use.
18-034-2005 Rongstad	Partially harvested 9-acre clearcut of oak over white pine regeneration. Property adjacent to Amish neighbor with products going to Amish community sawmill nearby. Discussion on cultural considerations.
18-001-1991- Dickinsen	Clearcut of aspen, jack pine, and some hardwoods, 2010. All white pine and scattered oak retained. Discussed retention of live trees and snags (dead standing trees).
18-005-1991 Dickinsen	Select cut of hardwoods; over abundant white pine regeneration. Copy of contract from consulting forester. Discussion of herbicide use and reporting.
18-038-2004 Freck	9-acre red pine thinning and pockets of root rot cleaning adjacent to hardwood select cut. Also viewed 2-acre sapling patch.
18-004-2006 Pulse Trust	Third thin in 10-acre red pine plantation, set-up, not cut. Select harvest of central hardwoods for quality pole and sawlog production, 29 acres, set up, not cut.
18-050-2004 Pulse	32-acre clearcut of oak and northern hardwood, set-up, not cut. Discussion regarding ensuring future snag production.

18-010-2007 Reynolds	Oak hardwood select cut of marked trees, patch cuts to regenerate aspen, set-up, not cut.
9/7/2011 – Chippewa County	
09-008-2005 Farm Pond LLC	Planned fourth thinning (no harvest yet) in 51-year-old planted red pine old field site. Marked thinning – residual density and tree selection will leave well stocked, productive stand.
09-004-2004 Labelle	Active timber sale. Thinning in planted red pine (1970 origin) and selection harvest in oak/hardwood stand, contractor interview.
09-012-1988- Johnson	Marked selection harvest in swamp hardwoods (to be cut in winter) and first thinning planted 1985 red pine. No harvest activity yet.
09-006-2008-	Salvage harvest of mature oak and aspen from 2010 blowdown in lake SMZ. Active harvest but logger not on site. Implementation of BMPs reviewed.
09-003-2009 King	Planned selection harvest (not marked yet) in red maple sawtimber, red maple poles, and oak-red maple.
09-014-1997 Wing, E	Planned selection harvest (not marked yet) in red oak large sawtimber.
09-015-1997 Wing, R	Planned selection harvest (not marked yet) in red oak large sawtimber, older completed harvest with regeneration, and landowner interview.
09-008-1993 Bowers	Planned harvest (not marked or sold) in 10-acre woodlot. Planned thinning in planted red pine and removal of overmature/low quality oak in mixed oak-white pine stand. Feasibility of control and conformance with FSC invasive species requirements discussed.
9/8/2011 – Clark County	
10-014-2009 Brown	Planned harvest. Aspen clearcut and single tree/group selection in red oak. Consultant interview on site. Larger stands were divided into smaller harvest block to accommodate landowner objectives for habitat diversity and wildlife habitat diversity; uncut blocks will be harvested at a later date.
10-012-2009 Meyer	Active harvest. Single tree and group selection in mixed oak stand and aspen clearcut. Logger interview, review of fuel/oil spill procedures.
10-015-2009 Buck Hill Corp.	Planned harvest: clearcut with oak/pine retention, thinning in red oak/red maple. Wildlife plot (1/2 acre) in field within the FMU.
10-043-2007 Guelzow	Partially completed harvest in aspen (clearcut in 3 patches totaling 10 acres) and thinning in mixed oak-northern repair of ruts, SMZ protection and wildlife tree management.
10-016-199 Shaw	Planned aspen clearcut, oak thinning, and red pine thinning. Will be winter job to avoid wet soil impacts.
10-009-1995 Pekol	Red pine third thinning and oak-red maple thinning completed in 2010. Small lot with no water issues.
10-008-1999 Christie	Oak thinning and northern hardwood selection harvest, and hickory-decline pocket salvage. Active job partially finished but logger was not on site.
10-050-2004 Moloczj	Property was high-graded before entry into MFL. To address the high-grading, WIDNR required corrective harvests.
9/8/2011 – Dunn County	
17-034-1993 Matter	Recent shelterwood/salvage harvest of northern hardwood (mostly oak) following an accidental fire, June 2011.
17-060-2003 Wirth	Oak shelterwood, 39 acres, snag and den tree retention.
17-066-2003 Fred Chipman	Active northern hardwood select cut over 71 acres, second entry, snag and den tree retention. Logger interview.
17-065-2003 Cynthia Chipman	Northern hardwood select cut over 133 acres, second entry, set-up, not cut.
17-068-2003	Northern hardwood select cut over 61 acres, second entry, set-up, not cut.

Tate	Discussion on potential impacts of climate change on species distribution.
17-025-2002 Gauger	Active select cut of 62-acre northern hardwood stand. Logger interview.
17-094-2002- Monn	Northern hardwood selection harvest and red pine thinning.
17-084-2002 Dotseth	Clearcut of northern hardwood and oak types removing overstory (focus on retaining existing regeneration), review of contract specification for wildlife trees.
9/9/2011 – Buffalo County	
06-030-2011 Noll	Active timber sale in oak/mixed hardwoods. Improvement cut in high-graded woodlot typical of the county, with primary focus on removing low-quality overstory trees and releasing better quality poles and small sawtimber. Logger interview and safety discussion and review of BMPs.
06-021-2003 Linse	Improvement cut/large group selection in northern hardwoods/oak. Logger interview, safety and hazardous materials review.
06-189-2003 Volmer, R	Aspen clearcut with oak retention. Harvested summer 2011, BMP review.
06-191-2003 Volmer, B	Same harvest as prior site, but different owner.
06-037-2007 JL Farms 3 LLC	Winter cut 2008-2009. Clearcut in oak-cherry and improvement cut in adjacent oak stands, review of county forester regeneration survey plot and landowner wildlife food plot.
06-041-2006 Okonek	Review of skid trail from 2009 harvest and stability of BMPs on a difficult site.
06-043-2003	Aspen-birch clearcut along narrow ridge. Green tree retention and BMPs observed.
9/9/2011 – Trempealeau County	
62-012-2000 Stellpflug	17-acre clearcut for remediation of poor quality oak/central hardwoods, with hardwood and conifer retention, October 2010.
62-201-2010 KJVESTD	Clearcut, salvage operation of an oak blowdown on 22 acres, April 2011.
62-010-2008 KJVESTD	Oak thinning down to 60-70 ft ² , retained visual buffer at the edge of the stand along county roadside.
62-041-2007 Lyngen	18-acre clearcut of oak, February 2011.
62-007-2011 Jensen	Oak clearcut, 18 acres retaining understory red maple reproduction, April 2011.
62-050-2007 Affeldt	Aspen and oak overstory removal on 5-acres, February 2010. Seed mix and seed Ag laws discussion, logger interview.
62-008-1997 Schmidt	Active harvest on 33-acre oak clearcut.
62-008-2005 Carbine	40 acre clearcut with 1.5 ac reserve patch.
62-008-1990 Hoch, D	Active 1 st thin of 22 year old red pine plantation. Harvest processor using liquid Sporax (borax) application on cut stump for preventive treatment of annosus root rot.
62-002-1990 Hoch, M	Same as previous, different owner.
9/12/11- Pepin County	
47-014-2001 Edlin	Clearcut with reserves (dispersed trees and patches) in oak/aspens. Logging recently completed but trails have not been closed out.
47-002-2001 Eichorn	Same harvest as 47-014-2007 in adjacent lot. County forester affirmed that abutter will continue the skid trail closeout on this lot
47-005-1992	Summer 2010 selection harvest in northern hardwood/oak stand and 20-

Carlisle	acre clearcut in aspen. Discussed skid trail BMPs, seeding for erosion control, and post-harvest site monitoring.
47-004-1997 King	Selection harvest in northern hardwood (sugar maple-basswood-ash, with oak component) small sawtimber. Landowner interview.

3.4. Stakeholder consultation process

WIDNR staff, consulting foresters, landowners, and contract loggers were interviewed at field sites and other stakeholder were consulted by email and/or telephone to provide additional evidence for evaluation of WIDNR to the requirements of the applicable standard. Specific comments provided to SmartWood were addressed as described in Section 2.3. These included emails and on-site meeting, and field review of three other parcels with issues identified as concerns to stakeholders.

Stakeholder type (i.e. NGO, government, local inhabitant etc.)	Stakeholders consulted or providing input (#)
Landowner (MFL group member)	15
Consulting forester	3
Environmental Conservation Group	1
DNR staff	18
Harvest operators (logging, hauling)	11

3.5. Changes to Certification Standards

Forest stewardship standard used in audit:	FSC-US Forest Management Standard (v1.0); FSC-STD-30-005 (Group Certification Standard); FM-35 SmartWood Chain-of-Custody Standard for Forest Management Enterprises (FMEs)
Revisions to the standard since the last audit:	<input type="checkbox"/> No changes to standard. <input checked="" type="checkbox"/> Standard was changed (detail changes below)
Changes in standard:	Changes related to the FSC-US Forest Management Standard are documented in an FSC-US Crosswalk document, which is available upon request. Changes to the Group Certification Standard are minor and available upon request. All changes were evaluated and reported in Appendix IV and Appendix VII.
Implications for FME:	New requirements result in new CARs issued

3.6. Review of FME Documentation and required records

a) All certificate types

Required Records	Reviewed
Complaints received by FME from stakeholders, actions taken, follow up communication	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Accident records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Training records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>

Comments:	
Operational plan(s) for next twelve months	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Inventory records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Harvesting records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	

b) Group Certificates *(delete this table if not a group certificate)*

Required Group Records	Reviewed
Group management system	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: See NCR 02/11 for deficiencies in internal monitoring in management system	
Rate of membership change within the group	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Formal communication/written documentation sent to members by the group entity during the audit period	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Records of monitoring carried out by the group entity	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: See NCR 02/11 for deficiencies in internal monitoring in management system	
Records of any corrective actions issued by the group entity	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Updated list of group members	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	

APPENDIX I: FSC Annual Audit Reporting Form:

Forest management enterprise information:			
FME legal name:	State of Wisconsin Department of Natural Resources		
FME Certificate Code:	SW-FM/COC – 003626		
Reporting period	Previous 12 month period	Dates	09/01/2010 - 08/31/2011

1. Scope Of Certificate			
Type of certificate: group	SLIMF Certificate: small		
New FMUs added since previous evaluation	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Group Certificate: Updated of FMU and group member list provided in Appendix VII-a:			
Multi-FMU Certificate: List of new FMUs added to the certificate scope:			
FMU Name/Description	Area	Forest Type	Location Latitude/Longitude
See New FSC FMUs Listing-Appendix I spreadsheet	36,870 ha	Natural	
	ha		
	ha		

2. FME Information	
<input type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)	
Forest zone	Temperate
Certified Area under Forest Type	
- Natural	974,144 hectares
- Plantation	hectares
Stream sides and water bodies	Linear Kilometers

4. Forest Area Classification	
<input type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)	
Total certified area	974,144 hectares
Total forest area in scope of certificate	913,245 hectares
Ownership Tenure	Private ownership
Management tenure:	private management
Forest area that is:	
Privately managed	913,245 hectares
State/Public managed	hectares
Community managed	hectares
Area of production forests (areas where timber may be harvested)	970,760 hectares
Area without <u>any</u> harvesting or management activities: strict forest reserves	3,384 hectares

5. High Conservation Values identified via formal HCV assessment by the FME and respective areas			
<input checked="" type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)			
Code	HCV TYPES¹	Description:	Area
HCV1	Forest areas containing globally, regionally or nationally significant concentrations of		ha

¹ The HCV classification and numbering follows the ProForest HCVF toolkit. The toolkit also provides additional explanation regarding the categories. Toolkit is available at <http://hcvnetwork.org/library/global-hcv-toolkits>.

	biodiversity values (e.g. endemism, endangered species, refugia).		
HCV2	Forest 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.		ha
HCV3	Forest areas that are in or contain rare, threatened or endangered ecosystems.		ha
HCV4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		ha
HCV5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		ha
HCV6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		ha
TOTAL HCVF AREA			ha
Number of sites significant to indigenous people and communities			

3. Workers		
Number of workers including employees, part-time and seasonal workers:		
Total number of workers	345 workers	
- Of total workers listed above	271 Male	74 Female
Number of serious accidents	4	
Number of fatalities	0	

6. Pesticide Use		
<input type="checkbox"/> FME does not use pesticides. (delete rows below)		
FME has a valid FSC derogation for use of a highly hazardous pesticide	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
FSC highly hazardous pesticides used in last calendar year		
Name	Quantity	# of Hectares Treated
Simazine, single site, <10 acres (see Major NCR 01/11)	Unreported	Unreported ha
Non FSC highly hazardous pesticides used in last calendar year		
Name	Quantity	# of Hectares Treated
2,4-D (Hi-Dep, Patron, etc.)	Unreported	50.18
Clopyralid (Transline)	Unreported	19.02
Glyphosate (Accord, Roundup, etc.)	Unreported	188.99
Metsulfuron methyl (Escort, Patriot)	Unreported	26.30
Sulfometuron methyl (Oust, Spyder)	Unreported	284.49
Triclopyr (Garlon, Tahoe, etc.)	Unreported	216.51
Borax (Sporax)	Unreported	246.66
Other	Unreported	295.82

Other	Unreported	0.40
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APPENDIX II: List of visited sites (confidential)

FMU or other Location	Compartment/ Area	Site description / Audit Focus and Rationale for selection
9/6/2011 – Eau Claire County		
18-003-2000 Carson	Stand 2	Red pine thinning set up but not cut yet. Trees marked by consulting forester. Hardwoods in stand are being retained.
18-011-2011 Smith	Stands 1&2	Planned oak wilt salvage, jack pine removal, and red pine thinning. SMZ retained on long steep slope above creek.
18-013-1991	Stand 1	Red pine row thinning and free thinning in white pine planting completed summer 2011. Both established in 1988 or 1989. Excellent site with good growth. Logger has moved off of this section of the job but did not install water bars; county forester will not close the job until they are installed.
18-010-1990 Heike	Stands 1&2	Series of small clearcuts in oak wilt and aspen patches. Six cuts totaling about 35 acres of a 160-acre stand. Job set up but not marked.
18-019-2006 Carlson	Stand 4	6-acre clearcut in birch-aspen, June 2011. Logger directly contracted with landowner. Ample retention trees of small red maple and cherry. Need for waterbars on the skid trail was discussed. Some minor sediment movement was noted, but no risk of it reaching water.
18-046-2009 Durest	Stands 1-2	Clearcut and improvement cut in mixed oak- summer 2011. Discussion about likely regeneration competition from boxelder.
9/7/2011- Eau Claire County		
18-214-1999 Anderson	Stand 1	Aspen clearcut with a hardwood riparian management zone that was select cut, May 2011. Discussion regarding unreported application of herbicides. Landowner stated use of unreported herbicides including FSC banned herbicide, Simazine.
18-034-2005 Rongstad	Stand 3	Partially harvested 9-acre clearcut of oak over white pine regeneration. Property adjacent to Amish neighbor with products going to Amish community sawmill nearby. Discussion on cultural considerations.
18-001-1991- Dickinsen	Stand 1	Clearcut of aspen, jack pine, and some hardwoods, 2010. All white pine and scattered oak retained. Also discussed snag retention. Few snags observed on site.
18-005-1991 Dickinsen	Stand 2	Select cut of hardwoods over abundant white pine regeneration. Copy of contract from consulting forester. Discussion of application of Garlon 4 for red maple control. Discussion of use of other unreported herbicides
18-038-2004 Freck	Stands 1,2&3	9-acre red pine thinning and pockets of root rot cleaning adjacent to hardwood select cut. Also viewed 2-acre sapling patch.
18-004-2006 Pulse Trust	Stand 2&3	Third thin in 10-acre red pine plantation, set-up, not cut. Select harvest of central hardwoods for quality pole and sawlog production, 29 acres, set up, not cut.
18-050-2004	Stand 1	32-acre clearcut of oak and northern hardwood, set-

Pulse		up, not cut. Discussion regarding ensuring future snag production.
18-010-2007 Reynolds	Stand 1	Oak hardwood select cut of marked trees, 23 acres, July 2010. Also put in 2 patch cuts to regenerate aspen, set-up, not cut.
9/7/2011 – Chippewa County		
09-008-2005 Farm Pond LLC	Stand 1	Planned fourth thinning (no harvest yet) in 51-year-old planted red pine old field site. Marked thinning – residual density and tree selection will leave well stocked, productive stand. Monoculture canopy and no snags, cavity trees, or large woody debris. Natural succession to hardwoods (primarily ash) and native ground cover, which are invading the understory.
09-004-2004 Labelle	Stands 1 and 3	Active timber sale. Thinning in planted red pine (1970 origin) and selection harvest in oak/hardwood stand. Job set up and marked by the county forester due to timing issues relative to meeting the required MFL schedule. Track-mounted processor and forwarder. Contractor interview. Contractor had FISTA certification. They have a spill kit but did not have it on site that day.
09-012-1988- Johnson	Stands 2 and 3	Marked selection harvest in swamp hardwoods (to be cut in winter) and first thinning planted 1985 red pine. No harvest activity yet.
09-006-2008-	Stand 1	Salvage harvest of mature oak and aspen from 2010 blowdown in lake RMZ. Active harvest but logger not on site. Result of salvage was similar to a selection cut – residual stand well stocked with red oak, aspen, red maple white pine and other species in a variety of age classes. Skid trail near lake (30-40 ft) in one short area where unavoidable, but no risk of sedimentation.
09-003-2009 King	Stand 1, 2, and 3	Planned selection harvest (not marked yet) in red maple sawtimber, red maple poles, and oak-red maple. The Habitat Type is a red maple type, so the oak will be gradually converted to red maple.
09-014-1997 Wing, E	Stand 7	Planned selection harvest (not marked yet) in red oak large sawtimber. The Habitat Type is a red maple type, so the oak will be gradually converted to red maple.
09-015-1997 Wing, R	Stands 8, 9, and 4	Planned selection harvest (not marked yet) in red oak large sawtimber (stands 8 and 9). The Habitat Type is a red maple type, so the oak will be gradually converted to red maple. Stand 4- similar stand and harvest type, harvest completed approximately 3 years ago. Landowner interview.
09-008-1993 Bowers	All stands	Planned harvest (not marked or sold) in 10-acre woodlot. Planned thinning in planted red pine and removal of overmature/low quality oak in mixed oak-white pine stand. Buckthorn 20-30% cover in understory. Feasibility of control and conformance with FSC invasive species requirements discussed.
9/8/2011 – Clark County		

10-014-2009 Brown	Stand 1 and 2	Planned harvest. Aspen clearcut and single tree/group selection in red oak. Consultant interview on site. Larger stands were divided into smaller harvest block to accommodate landowner objectives for habitat diversity and wildlife habitat diversity; uncut blocks will be harvested at a later date.
10-012-2009 Meyer	Stands 1 and 3	Active harvest. Single tree and group selection in mixed oak stand and aspen clearcut. Logger interview. Insurance met standard requirements (safety), but logger did not have any spill containment equipment on site.
10-015-2009 Buck Hill Corp.	Stands 2 and 5	Planned harvest, no contractor on site. Stand 2- aspen clearcut with oak/pine retention. Stand 5- thinning in red oak/red maple. Large wildlife plot (1/2 acre) in field within the FMU with unidentified annual crop (possibly rape or turnips).WIDNR did not have information on species planted or herbicide use.
10-043-2007 Guelzow	Stands 1&2	Partially completed harvest in aspen (clearcut in 3 patches totaling 10 acres) and thinning in mixed oak-northern hardwoods. Winter harvest (2010-2011) due to wet soils, but logger did not freeze trails and created some major ruts in main skid trail (not within stand). Consultant required him to smooth the ruts in dry weather, and this was recently completed. Contractor will return this winter to finish the job. Two creeks with no-cut RMZs and large wildlife trees.
10-016-199 Shaw	Stands 5 and 3	Planned aspen clearcut, oak thinning, and red pine thinning. Will be winter job to avoid wet soil impacts.
10-009-1995 Pekol	Stands 1&2	Red pine third thinning and oak-red maple thinning completed in 2010. Small lot with no water issues.
10-008-1999 Christie	Stands 1&2	Oak thinning and northern hardwood selection harvest, and hickory-decline pocket salvage. Active job partially finished but logger was not on site. Minimal tree damage and rutting. Only issue noted was that the consulting forester marked cull trees with an "X" but the prescription gave the logger the option to remove them. Because much firewood was being sold all cull trees were merchantable. Auditor observed that not marking some of the cull trees so that they would be sure to be left as den/cavity trees would be preferable to the optional removal in the prescription.
10-050-2004 Moloczyj	Stands 1 & 3	Property was high-graded before entry into MFL. To address the high-grading, WIDNR required corrective harvests. Stand 1 was originally intended to be a selection harvest, but heavy hickory mortality occurred due to hickory decline, so the prescription was changed to a clearcut. Excellent regeneration of aspen and other hardwood species with retention of oaks. Stand 3 was as high-graded northern hardwood stand that was not heavily harvested. Correction cut was a light thinning to remove low grade material. Consulting forester is working to get logger to return to correct one rutted area (no risk of water degradation and no erosion is occurring now).

9/8/2011 – Dunn County		
17-034-1993 Matter	Stand 2	Recent shelterwood/salvage harvest of northern hardwood (mostly oak) follows an accidental fire, June 2011.
17-060-2003 Wirth	Stand 1	Oak shelterwood, 39 acres with abundant snag and den trees observed.
17-066-2003 Fred Chipman	Stand 1	Active northern hardwood select cut over 71 acres, second entry, retained 90-100 ft ² basal area. Abundant snag and den trees observed. Interviewed logger, no chaps, spill kit.
17-065-2003 Cynthia Chipman	Stand 1	Northern hardwood select cut over 133 acres, second entry, set-up, not cut. Numerous snag and den trees observed for retention.
17-068-2003 Tate	Stand 1	Northern hardwood select cut over 61 acres, second entry, set-up, not cut. Discussion on potential impacts of climate change on species distribution. Commendable attention of foresters to providing options for future foresters in terms of forest composition and structure.
17-025-2002 Gauger	Stand 1	Active select cut of 62-acre northern hardwood stand. Logger observed using chainsaw without chaps
17-094-2002- Monn	Stand 1&2	Viewed partially harvested stand 1, northern hardwood with combination species (aspen), size, and marked tree select cut. Stand 2 a marked 3-acre red pine thinning. Inspected logger provided sale contract.
17-084-2002 Dotseth	Stand 1&2	Clearcut of northern hardwood and oak types removing overstory (focus on retaining existing regeneration). Contract specifies retention of den trees.
9/9/2011 – Buffalo County		
06-030-2011 Noll	Stands 1 and 2	Active timber sale in oak/mixed hardwoods. Improvement cut in high-graded woodlot typical of the county, with primary focus on removing low-quality overstory trees and releasing better quality poles and small sawtimber. One-man woods crew w/ chain saw and cable skidder; logger interview. Logger does not wear chaps (claims they get caught on too many branches) or steel-toed boots (claims they are too uncomfortable on the steep slopes characteristic of this area). No spill cleanup equipment other than a shovel. Workman's comp. and liability insurance. Water bars in completed area do not meet WIDNR guidelines (recommended); county forester did not think site would erode, but auditor observed at least one slope where heavy rains would not be able to leave a relatively long (over 150 ft.) and steep (perhaps 10%) slope.
06-021-2003 Linse	Stand 1	Improvement cut/large group selection in northern hardwoods/oak. Similar stand history as prior site. Logger did not cut all small trees group selection patches ("small clearcuts"). Logger only selling sawtimber, so material not merchandized was left in woods (excess beyond could be considered "waste" under Criterion 5.3). This utilization method is a cultural legacy from this region, as markets for low-grade material are improved over earlier periods. One

		ruted skid trail lacking waterbars and evidence skidding down a wooded ravine were observed. Logger interview: chaps not worn; has liability and workman's comp. insurance. Has had FISTA certification in the past but it is not current. Has spill kit but it is not kept on site.
06-189-2003 Volmer, R	Stand 3	Aspen clearcut with oak retention. Harvested summer 2011; job closed. Retention meets FSC & MFL requirements. Apparently cut when soil was wet; deep ruts were observed on most trails and some evidence of erosion and soil movement on the trails. No apparent risk to water quality.
06-191-2003 Volmer, B	Stand 2	Same harvest as prior site and same rutting issues observed.
06-037-2007 JL Farms 3 LLC	Stand 4	Winter cut 2008-2009. Clearcut in oak-cherry and improvement cut in adjacent oak stands. County forester had one of several county-wide regeneration plots at this site to monitor deer browsing impacts. Wildlife food plot created at one edge of the clearcut without WIDNR approval. Food plot no tilled, but mowed and seeded around clearcut stumps, and planted with clover and possibly other species. WIDNR states this is actable per their regulations as long as area of non-productive is less than 20% total.
06-041-2006 Okonek	Stand 1	Review of skid trail from 2009 harvest. Logger had stabilized the trail with water bars and seed, but was now somewhat eroded and had no vegetative cover. ATV use by landowner may contribute to the problem, but the trail is at the low point of a wooded ravine and water has no other place to go. The option of moving the trail to higher bench (observed to the left of the trail) at the time of the next harvest was discussed. No risk of stream sedimentation.
06-043-2003	Stand 3	Aspen-birch clearcut along narrow ridge. Cut meets FSC and MFL retention requirements. No apparent erosion/skid trail issues. Active job, but logger had left for the day.
9/9/2011 – Trempealeau County		
62-012-2000 Stellpflug	Stand 1	17-acre clearcut for remediation of poor quality oak/central hardwoods, with hardwood and conifer retention, October 2010.
62-201-2010 KJVESTD	Stand 5	Clearcut, salvage operation of an oak blowdown on 22 acres, April 2011.
62-010-2008 KJVESTD	Stand 1	Oak thinning down to 60-70 ft ² , retained visual buffer at the edge of the stand along county roadside.
62-041-2007 Lyngen	Stand 1	18-acre clearcut of oak, February 2011.
62-007-2011 Jensen	Stand 2	Oak clearcut, 18 acres retaining understory red maple reproduction, April 2011.
62-050-2007 Affeldt	Stand 4	Aspen and oak overstory removal on 5-acres, February 2010. Seed mix and seed Ag laws discussion. During interview with landowner, who logged this site, he stated he did not wear safety chaps while logging when hot out. Received FISTA and SFI required training.

62-008-1997 Schmidt	Stand 1	Active harvest on 33-acre oak clearcut.
62-008-2005 Carbine	Stand 3	40 acre clearcut with 1.5 ac reserve patch. Retention of 1-2 oak trees in management plan not followed during harvest.
62-008-1990 Hoch, D	Stand 3	Active 1 st thin of 22 year old red pine plantation. Thin every third row reducing basal area from 160 ft ² to 90 ft ² . Harvest processor using liquid Sporax (borax) application on cut stump for preventive treatment of annosum root rot. Commendable cooperation between landowner, forester, and WI Master Logger in proactive treatment of annosum root rot.
62-002-1990 Hoch, M	Stand 3	Same as previous.
9/12/11- Pepin County		
47-014-2001 Edlin	Stand 1	Clearcut with reserves (dispersed trees and patches) in oak/aspens. Ample reserves. Logging recently completed but trails have not been closed out. County Forester said that the landowner, who has a construction business, intends to move his equipment onto the site very soon to close out the trails with BMPs.
47-002-2001 Eichorn	Stand 3	Same harvest as 47-014-2007 in adjacent lot. County forester affirmed that abutter will continue the skid trail closeout on this lot
47-005-1992 Carlisle	Stands 3 and 5	Summer 2010 selection harvest in northern hardwood/oak stand and 20-acre clearcut in aspen. Logger did not put in water bars before leaving. Trails were seeded by the buyer (Bee Lumber) but County Forester identified erosion in late fall, and had logger fix the problem (through landowner contact). Steep trail further into the stand still did not have waterbars but it is currently stable due to seeding. However, as seed mix dies off problems could develop as there is no way for water to get off the trail.
47-004-1997 King	Stand 1	Selection harvest in northern hardwood (sugar maple-basswood-ash, with oak component) small sawtimber. Stand more two-aged than all-aged (sawtimber and poles, but not seedlings/saplings), and County Forester and agreed with consultant that perhaps gaps should have been larger to promote regeneration. Dense layer of wood nettles, but no hardwood seedlings since the 2009 harvest. Logger moved off site voluntarily during a wet summer period. Landowner interview, three generations of family management.

APPENDIX III: List of stakeholders consulted (confidential)

List of FME Staff Consulted

Name	Title	Contact	Type of Participation
Skorczewski, Jim	Chippewa County Forester	715-726-7885	Field interview
Schmitz, Chris	Clark County Forester	715-743-0539	Field interview
Weaver, Brent	Buffalo County Forester	608-685-6223	Field interview
Kubler, Mark	Area Leader	715-684-2914 x 114	Field interview
Molback, Matt	Pepin County Forester	715-672-4153	Field interview
Williams, Quinn	WIDNR Forestry Attorney	608-266-1318	Phone interview
Symes, Ken	Forest Certification Coordinator	608-267-0547	Interview
Edge, Steve	Eau Claire Team Leader	839-3754	Interview
Crow, Jerry	Forest Tax Field Manager	715-612-0980 (mobile) 715-453-0642 x 1260	Interview
Hardin, Carmen	Forest Hydrologist	715-365-8911	Interview
Nelson, Kathy (phone only)	Forest Tax Section Chief		Interview
Westegaard, Paul	Area Forestry Specialist	715-284-1481	Interview
Widstrand, Chris	Forester	715-839-3782 PO Box 4001 Eau Claire, WI 54702 christopher.widstrand@wisconsin.gov	Interview
Jordan, Jay	Dunn County Forester	921 Brickyard Rd. Menomonie, WI 54751 715-232-1516 jay.jordan@wisconsin.gov	Interview
Strand, Rob	Dunn County Forester Forester	921 Brickyard Rd. Menomonie, WI 54751 715-232-6980 Robert.Strand@wisconsin.gov	Interview
Dehmer, Dan	Trempeleau County Forester	P.O. Box 645 Whitehall, WI 54773 715-538-4480 daniel.dehmer@wisconsin.gov	Interview
Edge, Greg	Area Supervisor	608-785-9011	Interview

List of other Stakeholders Consulted

Name	Organization	Contact	Type of Participation
Anderson, Roy	Landowner (Eau Claire Co.)	715-877-2165	Field interview
Walters, Jason	Walters Logging (Chippewa Co.)	715-313-0372	Field interview
Wing, Ellen and Robert	Landowners (Chippewa Co.)	715-723-8037	Field interview
Gress, Steve	Consulting forester (Clark Co.)	715-569-4678	Field interview
Hengst, Fred	Consulting forester (Clark Co.)	715-851-0625	Field interview
Hoppa, Monty	Dairyland Forest Products (logging contractor, Clark Co.)	715-743-6193	Field interview
Hoppa, John	Dairyland Forest Products (forwarder driver/truck driver contractor, Clark co.)	715-743-6193	Field interview
Arnoldy, Gilbert	Carothers Logging (Buffalo County)	608-685-4518	Field interview
Hoffer, Greg	Logging contractor (Buffalo County)	715-495-9220	Field interview
King, Edward	Landowner (Pepin Co.)	952-941-4708	Field interview
Anderson, Henry	Landowner	715-597-3509	Interview
Rongstad, Arnold	Landowner	715-286-4155	Interview
Paddock, Bob	Consulting Forester	715-286-4130	Interview
Matter, Gene	Landowner	133 Marshall Ave, St. Paul, MN 55071	Interview
Bignall, Royal	Owner, RB Logging	715-308-1417	Interview
Hoyt, Jason	RB Logging		Interview
Lande, Joel (Holly Monn)	Landowner	715-556-5003	Interview
Stellphlug, Kurt	Landowner	608-797-5988	Interview
Thorson, Brian	KJVESTD landowner and logger	608-222-1684	Interview
Thorson, Jerry	KJVESTD landowner	608-222-1684	Interview
Thorson, Gerald	KJVESTD landowner	608-222-1684	Interview
Lynge, Darryl	Logger, Learwood Products	715-299-6823	Interview
Affeldt, Quinn	Private logger and landowner	608-525-2704	Interview
Nelson, Dan	DMS Forestry (logging)	715-703-0543	Interview
Nelson, Steve	DMS Forestry (logging)	715-703-0543	Interview
Hoch, Daryl	Landowner	715-878-4798	Interview
Hoch, Michael	Landowner	715-878-4798	Interview
Delaney, Laurie	Delaney Forest Products	608-378-3022	Interview

APPENDIX IV: Forest management standard conformance (confidential)

This Appendix outlines the identified gaps, or new requirements of the FSC-US National Standard V1.0 as compared to the FSC Lake States Regional (v3.0). This appendix is to be used with the Lake State Std Crosswalk 2010 which provides a crosswalk between the current FSC-US Forest Management (FM) Standard (V1.0, July 8, 2010). Findings of conformance or non conformance at the indicator level for the identified gaps will be documented in the following table with a reference to an applicable CAR or OBS. The nonconformance and CAR is also summarized in a CAR table in Section 2.4. All non-conformances identified are described on the indicator level for the identified gaps.

Gap Analysis: FSC Lake States Regional (v3.0)

Applicability to use Family Forest Standards:

The auditors determined that WIDNR conducted a satisfactory risk assessment based on the group size, scale and intensity of operations, and the likelihood of impacts in the surrounding landscape for all indicators that have Family Forest (FF) indicators. The documented risk assessment concluded that group members were a low risk designation for all indicators applicable to Family Forests. The risk assessment is on file.

FSC-US FM Std. Indicators	Conformance Yes/No	Findings for Identified Gaps	CAR OBS #
Principle 1			
FF 1.2.a	N/A	Family Forest: Low Risk	
1.6.b	Yes	<p>WIDNR has documented the reasons that landowners may seek partial certification. Private landowners are free to designate their choice of lands as Managed Forest Law as long as it meets eligibility requirements. Reasons for not designating lands may include such things as wanting to leave land out as a future building site for a building that would not be allowed on MFL.</p> <p>Entire MFL entries or "orders" become a part of the MFL Certified Group. This requirement is found in Chapter 21, Forest Tax Law Handbook, page 21-5.</p> <p>The MFL Certified Group option will be available on a voluntary basis to all MFL participants owning 10 to 2,470 acres (1,000 hectares) provided they have a parcel-specific MFL forest stewardship plan for the land. Land enrolled under a single MFL order may be either in or out of the MFL Certified Group, but not a mixture of the two.</p> <p>"MFL large ownerships," as defined in chapter NR 46.18(4), Wis. Adm. Code, with general management commitments are not eligible to join the MFL Certified Group. Such large ownerships (generally companies with their own professional forestry staff) are encouraged to seek forest certification through other programs.</p>	
FF 1.6.c	Yes	<p>WIDNR has stated that no significant changes in ownership or management planning have occurred since the in the past year. No evidence to the contrary was found during the audit. WIDNR has informed SmartWood of changes in the certified land base. Since the last annual audit enrollees of the MFL program increased the acreage of the MFL Certified Group by approximately 3.6%. Management planning criteria have not changed.</p>	
Principle 2			

Principle 3			
3.2.b	Yes	<p>Six bands of the Ojibwe (also referred to as the Chippewa in some documents) have off-reservation treaty rights for hunting, fishing, and gathering resulting from the treaties of 1837 and 1842. These rights were affirmed for lands within Wisconsin by the 1983 Voigt Decision, which was upheld in later court appeals. Three additional Ojibwe bands were not part of the court case, but WIDNR reports that the State of Wisconsin “looks the other way” if members of those tribes seek to exercise their rights. The treaty rights areas within Wisconsin are located roughly in the northern third of the state as shown on the Great Lakes Fish and Wildlife Commission website.</p> <p>Tribal members may exercise off-reservation hunting and fishing rights within the treaty area in accordance with tribal regulations on public lands as well as MFL lands that are not “Closed” as defined in the MFL regulations. WIDNR reports that for the most part these rights are exercised on public lands and large private (typically non-MFL) lands.</p> <p>The tribes also retained gathering rights for edible and medicinal plants and miscellaneous forest products (e.g. birch bark). These rights are only applicable to public lands and do not apply to MFL.</p>	
Principle 4			
4.2.b	Yes	<p>Because loggers contract directly with landowners and are not under WIDNR supervision, WIDNR has no control over safety practices and contracts or other agreements between loggers and landowners or timber buyers.</p> <p>All WIDNR foresters wear glasses at all times in the field, and hardhats when on active logging jobs.</p> <p>All chainsaw operators observed wore hardhats, but several loggers were not wearing safety chaps. All claimed that the chaps were too hot in the summer and get caught on brush, so they have concluded that they are safer without the chaps. All loggers interviewed have had safety training (“FISTA”), although for one it may not have been current (interview responses from one logger were ambiguous). The WIDNR MFL Group Certification Handbook (p. 21-11) states that “DNR Foresters are encouraged to consider” if “Reasonable safety precautions are followed,” but notes that “Wisconsin statutes do not authorize WIDNR foresters to enforce or administer specific Occupational Safety & Health Administration (OSHA) regulations on private lands. WIDNR Service Foresters may, however, offer general safety information or observations about safety concerns.” The audit team has concluded that WIDNR does not routinely “offer general safety information or observations about safety concerns” and the auditors have addressed this issue in Appendix VII: Group management conformance checklist of this report (see NCR 02/11).</p> <p>DNR provides landowners with a contract template from Wisconsin Woodlands Owners that has a safety clause. WIDNR reports that most foresters use a version of this contract. Contracts reviewed had at minimum requirements that contractors carry Wisconsin Workman’s Compensation coverage and assume all liability for any damage or injury. Other logger interviewed did not have the contract on site but reported that the same insurance requirements were part of their standard contract with landowners. The audit team has concluded that proof of insurance and assumption of liability can be considered to be a “safety” requirement meeting the intent of this indicator. One landowner interviewed had a handshake agreement with a logger to harvest 6 acres of aspen, but there was no written agreement with safety requirements.</p>	

		In sum, the audit team has found conformance with this indicator.	
4.4.a	Yes	<p>SmartWood has concluded that due to the size of the MFL program the standard indicator is applicable to WINDR at the program level and the FF Indicator 44.a is applicable to forest owners and managers.</p> <p>WINDR Program Level (Indicator 4.4.a) WIDNR has incorporated all elements of the social impact assessment into its program policies and procedures, guidance, and land landowner information, as follows:</p> <ul style="list-style-type: none"> • Historically significant sites and archeological sites are identified using the Archeological and Historical Database. This database is consulted at the time a management plan is written and at the time each Cutting Notice is prepared. Examples of these sites include burial sites, ceremonial sites, logging camps, early homesteads, etc. The County Foresters check the database. If there is a “hit” the foresters then check with the appropriate agency for applicable details and management recommendations. In addition, WIDNR has provided training sessions for staff and consulting foresters in the identification of archaeological sites. Cutting notices examined during the audit provided evidence that WIDNR foresters are checking the database. • Applicable public resources include air, water, and fish and game regulated by the state. Because there is no manufacturing, air is not specifically addressed. Water quality and quantity is addressed by Wisconsin’s BMPs for water quality and specific to the MFL program, on-site review of harvests by WIDNR foresters. WIDNR fish and game regulations and polices control harvests and manage populations. • Aesthetics are addressed in Chapter 4 of the in Forest Management Guidelines. The guidelines address aesthetics issue, classification of areas based on visual quality, and techniques to minimize impacts. Reference to aesthetic values was noted in the forest management plans reviewed during the audit. • Community goals are addressed through statewide policies and programs to promote sustainable management and use of forest resources and associated manufacturing and employment opportunities. The MFL program itself is an example of such a program. Other statewide goals for forest and natural resource protection that are considered directly or indirectly in the implementation of the MFL program include Community Wildfire Protection Plans, Wisconsin’s Wildlife Action Plan, the State Comprehensive Outdoor Recreation Plan, Wisconsin’s Strategy for Reducing Global Warming, and Wisconsin’s Sustainability Framework. • Community economic opportunities through the primary MFL goal of production of commercial forest crops. Economic values, goals, and strategies are included as “Theme D” of the 2010 Assessment of Wisconsin’s Forest Resources. • Other people who may be affected by management operations are addressed by Theme E of the statewide forest assessment, including forest workers and their safety, people and property at risk from forest fire, and people affected by unlawful forest practices. See http://dnr.wi.gov/forestry/assessment/WIforestsAtMillennium.htm <p>Forest landowner and manager level (FF Indicator 4.4.a) Foresters and landowners interviewed during the audit demonstrated knowledge of the potential cultural resources, public values, and socio-</p>	

		<p>economic aspects of management. Management plans and Cutting Notices reflected knowledge of these values. Examples observed during the audit include:</p> <ul style="list-style-type: none"> • Historical and archeological searches documented in cutting notices. • Protection of soil and water resources and wildlife habitat management. • Aesthetics addressed in management plans and in the field (e.g., greater levels of retention in clearcut edges near roads). • Economic values supported by management. • Coordination with abutting landowners when management activities are occurring. 	
4.5.b	Yes	<p>WIDNR provides a publicly accessible means for interested stakeholders to voice grievances and have them resolved. When significant disputes arise related to resolving grievances and/or providing fair compensation, the WIDNR has instituted appropriate dispute resolution procedures that are publicly available through the MFL website. WIDNR provided evidence of open communications, responses to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suits and claims. All WIDNR staff interviewed during the site visit demonstrated knowledge of the existence and steps to obtain procedures for resolving disputes.</p>	
Principle 5			
5.5.a	Yes	<p><i>Auditor's note:</i> The FF guidance for this indicator is as follows: <i>Compliance with this Indicator is scale-dependent. Large groups of family forests might have a greater impact in impacting and affecting these issues.</i> Because MFL is a large group, this guidance was considered in auditing this indicator. The auditors addressed this indicator primarily by focusing on WIDNR program level, which has developed required and recommended measures to address these resources.</p> <p>Municipal watersheds, water quality, and fisheries habitat. Measures to protect these resources include required use of Best Management Practices on MFL lands. BMPs are prescribed to prevent erosion and sedimentation associated with logging roads, landings, access points, and stream crossings. Regional differences in soils and watershed issues have been addressed in BMP compliance monitoring, updates to the BMP manual, and region-specific training.</p> <p>Carbon storage and sequestration. Theme C of the recent statewide forest resources assessment identifies carbon storage and sequestration as important values of forests and identifies goals and a number of strategies to increase this ecological service. A summary of this information is also included in the FMGs.</p> <p>Recreation and Tourism. Recreation and tourism are addressed in Chapter 4 Aesthetics) of the FMGs. Specifically, the FMGs recognize the value that visual quality plays in supporting Wisconsin's recreation and tourism industries. The FMGs provide recommendations to address potential aesthetic impacts. Values are also addressed in the structure of the MFL program, and a separate MFL category with a lower tax rate is available for landowners who allow non-mechanized recreation such as hunting, fishing, or skiing on their properties.</p>	
5.5.b	Yes	<p>Land owners and managers maintain forest services and resources identified in Indicator 5.5.a as follows:</p> <ul style="list-style-type: none"> • Field observations indicated that BMPs to protect water quality that may influence municipal watersheds and fisheries habits are 	

		<p>being implemented by forest owners and managers.</p> <ul style="list-style-type: none"> • Forests are being managed at or below growth, which is an indicator that rates of carbon storage and sequestration are being maintained. • The MFL forests help maintain Wisconsin's scenic rural character, thereby indirectly supporting recreation and tourism. Game populations are very dependent on private lands, and management of these game species habitats by MFL members helps supports Wisconsin's valuable hunting industry. 	
FF 5.6.a	Yes	<p><i>FF Indicator 5.6 is applicable to the MFL ownerships.</i></p> <p>Sustained yield is managed at the stand level use the required practices in the MFL Silviculture Handbook. The Handbook describes silvicultural systems and required treatments, stocking, and schedules for all Wisconsin forest types. All phases of stand development from establishment to final harvest and subsequent regeneration (even-aged systems) or ongoing harvest and regeneration (for uneven-aged systems) are prescribed. These practices are consistent with generally accepted silvicultural practices for the region that have been developed and supported by scientific research. Harvests are approved by the WIDNR foresters to ensure that they are consistent with the Silviculture Handbook.</p> <p>Scheduled harvest dates are determined using projected growth data, age of timber, desired timber type and stand conditions, and ecological and legal constraints. Detailed forest inventories are done before establishing timber harvests to fully understand new stand conditions, including reviewing information in NHI, archeological, historical databases, as well as manuals, BMPs, handbook, guidelines, etc.</p> <p>Most MFL landowners have small acreage that do not lend themselves to developing an annual allowable harvest, however landowners may choose to break up timber harvests into small units to meet wildlife and aesthetic management goals. Documentation of these decisions is reflected in the landowner's file and/or the management plan.</p>	
5.6.c	Yes	<p>Management practices prescribed in the Silviculture Handbook are designed to reduce stocking levels, allow continued growth on dominant and co-dominant trees, and allow full site utilization so that future harvests can be completed in 10 to 15 years. Harvesting or thinning is scheduled when tree growth begins to slow, but before tree health declines due to over-stocked conditions.</p> <p>DNR's Silviculture Handbook prescribes entry and thinning levels particular to each timber type. These guidelines allow a wide range of options to meet landowner and product goals, and allow for health and quality of the trees.</p> <p>Many timber stands are still recovering from management practices that may have occurred before enrollment in MFL, including heavy harvesting, pasturing, and other practices. Management practices ("corrective harvests") in these stands are prescribed to decrease the influence of weedy trees (e.g., boxelder) and invasive shrubs, removing low-quality overstory trees, releasing better quality stems and/or encouraging regeneration as necessary. Tending practices and non-commercial treatments are prescribed to identify and develop crop trees. The field audit verified that stands were well-stocked with quality trees; improvement harvests were occurring to increase the ratio of acceptable to unacceptable growing stock; or regenerating stands is occurring as necessary to improve long-term quality and stocking.</p>	
Principle 6			
6.1.a	Yes	WI DNR's current Forest Management Plan Standards (e.g., Appendix 13 of Forest Tax Law Handbook) require that an on-the-ground	

		<p>assessment of current conditions is completed and documented when forest management plans are developed for MFL properties. These formal evaluations exceed the minimal, informal elements required in the FF indicators for 6.1.a.</p> <p>Foresters interviewed during field site visits were able to provide written summaries and maps showing the required elements. Foresters conduct a query of WI DNR's Natural Heritage Inventory (NHI) database is used to determine the known or likely occurrence of RT&E species and natural communities on or adjacent (e.g., 1 mile buffer) to the property. Results of the NHI screening were included in management plans which were provided for all inspected sites (n>55). The Natural Heritage Inventory (NHI) database searches for NHI species on the individual property and within a one mile radius. If NHI species are absent from the MFL property but found within a one mile radius, foresters are required to determine if that habitat exists on the MFL property. If the appropriate habitat is found along with the species, DNR or cooperating forester or landowner reports the species to the Endangered Resources program by contacting their local specialist or by filling out report forms:</p> <ul style="list-style-type: none"> • Rare animal - http://dnr.wi.gov/org/land/er/forms/rare_animal_report.asp • Rare plant - http://dnr.wi.gov/org/land/er/forms/rare_plant_report.asp Many times an Endangered Resource specialist contacts the landowner directly to verify the finding and provide additional management assistance. The Landowner Incentive Program (LIP) is available to provide cost-share assistance to manage for this species. Additional information available to landowners with NHI species on their property can be found at http://dnr.wi.gov/org/land/er/wlip/rarespecies.htm. • <i>Water resources and riparian habitats:</i> These elements are included in stand assessments and also shown in site maps; • <i>Soil resources:</i> This element was included in formal stand assessments and interviews with foresters demonstrated knowledge of local soil conditions and influences on the ecology and management of forest stands. <p>Examination of numerous management plans and/or cutting notices (over 55) were made by the audit team. All plans for current management activities included these assessments of current stand conditions.</p>	
6.1.d Public forest only	N/A	There are no public lands.	
6.2.c Public forest only	N/A	There are no public lands.	
6.3.a.3	Yes	WIDNR provides guidance for the management of old-growth forests. Old-growth forests in Wisconsin are generally rare. They were well represented in the mid 1800's, but were mostly harvested and either replaced by younger or converted to other land uses. The handbook, "Old Growth and Old Forests Handbook, HB24805" provides extensive guidance on maintenance and restoration of old growth habitat.	
6.3.b	Yes	The State of Wisconsin has conducted comprehensive state-wide forest assessments and development of strategic directions to support both landscape and stand-level forest sustainability. The MFL program is managed within the context of overarching state-wide frameworks to support forest sustainability and ecological values. June 2010, the	

		<p>State of Wisconsin completed a state-wide forest assessment providing Wisconsin's Forest Sustainability Framework (Framework). http://dnr.wi.gov/forestry/assessment/framework.htm. The Framework established a series of seven broad criteria and nineteen indicators intended to measure the sustainability of Wisconsin's forest resources. The Assessment uses the structure of the Framework to gather data around those seven criteria. From this strategic directions were determined. During this process of developing the "Assessment" and "Strategy", the State of Wisconsin took into consideration of other existing statewide plans with the intent to build upon and complement other State natural resource plans and identify opportunities for coordination. One of these state-wide plans is the Ecological Landscape Handbook (http://www.dnr.state.wi.us/landscapes). The MFL program is explicitly incorporated into actions plans designed to achieve goals outlined in strategic documents. Monitoring the actual contributions of the MFL program towards the included ecological landscape strategic goals is achieved, in part, by volume tracking of removals through mandatory management practices of the program. Additional monitoring is provided through continuous statewide forest inventory. Acreages of forest types as well other stand data are maintained through a comprehensive system of forest inventory and harvest tracking to assess contributions of the MFL program towards these landscape ecology goals.</p> <p>Interviews with administrative and operational forestry staff demonstrated general understanding of ecological landscape objectives No known old growth were observed on any audit sites this year but WIDNR guidance is in place should old growth be found or reported.</p>	
FF 6.4.a	Y	<p>As part of the forest land assessment, the Natural Heritage Inventory (NHI) database is reviewed to determine location of natural communities. DNR defines a natural community as an assemblage of different plant and animal species, living together in a particular area, at a particular time, in a specific habitat. Communities may be named for their dominant plant species (for example, pine barrens, sedge meadows, and oak savannas), a prominent environmental feature (Great Lakes Dune, Dry Cliff), or some combination of these factors. Communities range in size from less than an acre to thousands of acres. Communities are dynamic and always changing. Some change may be rapid while other change is too slow for many humans to notice during their brief lifetimes.</p> <p>The location and abundance of ecological communities are determined by environmental factors such as climate, geology, landform, soils, and hydrology interacting with natural disturbance events, including windstorms, fires, droughts, floods, and insect infestations to shape Wisconsin's landscape. Human activities, beginning with Native Americans and continuing today with our pervasive and intensive uses of land and water, have also had profound impacts on Wisconsin's biological communities.</p> <p>Each of the major communities represents an aggregation of more finely divided community types described by plant ecologists beginning in the 1950s (see "The Vegetation of Wisconsin" by John T. Curtis). The Natural Heritage Inventory Program tracks examples of all types of Wisconsin's natural communities that are deemed significant because of their undisturbed condition, size, what occurs around them, or for other reasons.</p> <p>Landowners who have a significant natural community identified in the NHP database on their property, or who have the ability to develop the characteristics of a natural community are notified of management</p>	

		<p>opportunities and options. Many natural communities may have active land management opportunities, including timber harvesting.</p> <p>There are no mid-size or large forests in Wisconsin's MFL Certified Group. The MFL Certified Group allows landowners of 10 to 2,470 acres (1,000 hectares) to be certified under the group.</p>	
FF 6.4.b	Yes	<p>Voluntary protection of outstanding examples of natural communities is consistent with FF Indicator 6.4.b..Landowners who have a significant natural community listed on their property, or who have the ability to develop the characteristics of a natural community are notified of management opportunities and options. Many natural communities may have active land management opportunities, including timber harvesting. Many MFL landowners may choose to work towards developing underrepresented ecosystems if they are compatible with land management goals and program requirements.</p> <p>There are no mid-size or large forests in Wisconsin's MFL Certified Group. The MFL Certified Group allows landowners of 10 to 2,470 acres (1,000 hectares) to be certified under the group. MFL landowners have the ability to establish or maintain natural areas on their property as an ecological reference condition.</p>	
6.4.d	Yes	The assessment described in 6.4.a is updated prior to harvesting, and the current natural community data are always available to the county forester.	
6.5.b	Yes	<p>WIDNR has found over 92% compliance with Best Management Practices, and field evidence during the audit indicated generally strong performance. However, some regions present challenges. Due to concerns about erodible soils, the revised Best Management Practices for Water Quality now includes a section specific to the Driftless Area. During the 2011 audit in Buffalo County, the auditor observed skid trails without water bars on steep slopes and some soil rutting. This was an active sale and remediation was planned prior to ending harvest activities and although there was no damage the observation merited documentation. See OBS 01/11.</p>	OBS 01/11
6.6.a	No	<p>In procedures, WIDNR uses FMP plans, data and maps combined with label requirements and, as needed, post-activity monitoring by staff to meet Family Forest standards.</p> <p>However, during field interviews landowners provided information on pesticide use that was previously unreported. Additionally, one landowner reported the use of Simazine, an herbicide listed on the FSC Highly Hazardous pesticide list and is a banned pesticide. WIDNR is not adequately conducting internal monitoring of pesticide use (NCR 01/11)</p>	NCR 01/11
FF 6.6.b	Yes	<p>Preference is given to non-chemical treatments. http://dnr.wi.gov/invasives/fact/loosecontrol.htm Landowners who apply chemicals fill out the Chemical Use Reporting Form http://dnr.wi.gov/forestry/certification/chemical_use.htm Examples of completed Chemical Use Reporting Forms were provided to auditors.</p>	
6.6.d	Yes	WIDNR only allows pesticides not classified as "Highly Hazardous" by FSC. Low toxicity herbicides (e.g., glyphosate) are generally recommended with stronger chemicals only recommended as necessary. Treatments are narrowly targeted (e.g., spot spraying or cut-stem treatments). The product label serves as the written prescription. The label includes instructions for mixing, application methods, personal safety practices and equipment, and minimizing environmental risks.	
6.8.b	N/A	MFL members do not currently use biological controls.	
6.8.c	N/A	MFL members do not currently use biological controls.	
6.10.d	Yes	WIDNR reports that no natural or semi-natural stands have been	

		converted to plantations. No evidence of conversion to plantations was observed during the current field audit or past (2008-2010) audits.	
6.10.e	Yes	<p>There are no stand type conversions to plantations (see 6.10.d). WIDNR does allow up to 20% of an FMU to be in non-forested acreage and land unsuitable for timber production, and this may include conversion of forest to non-forest cover such as wildlife openings or recreation trails. Although this constitutes conversion to a non-forest cover type, the converted areas are managed within the context of the management plan as a "forest use" and thus are not subject to the conversion limitations of Indicator 6.10.a.</p> <p>Any such cover type conversion would be documented either in the management plan or approved by WIDNR Forester through the cutting notice. All practices would be required to follow BMP's, NHI/Cultural and historical preservation requirements, and protection of sensitive areas or would not be approved.</p>	
6.10.f	Yes	<p>There are no subsurface rights on most MFL FMUs. However, in some northern Wisconsin counties there are areas with subsurface gold and iron rights are held by others. In Chippewa County, there is a rapidly developing market for the high quality sand used as a component of fluids used for hydro fracturing natural gas wells in other regions of the county. There are various arrangements for sale of the sand, and some include sale or lease of the mining rights rather than outright sale of the property. It is likely that in all cases the area with these subsurface rights is withdrawn from MFL at the time the subsurface rights are exercised and before the timber is harvested, because an early (non-scheduled) harvest would not be approved.</p>	
Principle 7			
FF 7.1.a.1	Yes	<p>Landowners are required to submit documents proving ownership of lands, including deeds, land contracts, probate documents, and judgments. Many of these documents list rights held by others. Documents that transfer rights to others that were initiated after the date of the owner acquired the land may also be provided, including conservation easements. DNR may require these and other documents if ownership and management of the lands are not clear.</p> <p>Written management plans exist for all MFL landowners under the MFL Certified Group.</p> <p>The management plan includes the following components:</p> <ul style="list-style-type: none"> • Management objective – Management plans are developed to meet landowner goals and program requirements. Landowner goals can range from ecological, silvicultural, social or economic. Foresters work with landowners to amend goals if these goals cannot be met due to site conditions, expense of proposed management practices, legal constraints, or program requirements. Landowners are allowed to change their management goals at any time during the MFL program. DNR would work with the landowner to determine if these new goals can be accommodated. Landowners are encouraged to withdraw from the MFL program if their goals and program requirements are no longer compatible (i.e. building homes, subdivisions, conversions to non-forestry land uses, etc.). • Duration of the plan – Management plans list the start and ending date of the plan. Landowners choose a 25- or 50-year enrollment period. • Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information. MFL lands are divided into timber stands. Timber stand data are entered into DNR's PlanTrac database and include the following information. Items marked with an asterisk have associated wording that will populate a management plan 	

		<p>after DNR's new web based program is developed (development is in progress):</p> <ul style="list-style-type: none"> • Landscape within which the forest is located – Wisconsin DNR's Division of Forestry uses a variety of tools to classify lands to distinguish land areas that differ from one another in ecological characteristics. A combination of physical and biological factors, such as climate, geology, topography, soils, water, and vegetation, are used to differentiate areas. These factors are known to control or influence biotic composition and ecological processes. Together, they provide a useful approximation of ecosystem potentials. Land areas identified and mapped in this manner are known as ecological units. Maps of ecological units can be developed at many spatial scales, depending on the needs of the user. The maps, along with information about the ecological units, convey information about land characteristics and capability. Management plans are prepared after consultation with the National Hierarchical Framework of Ecological Units (NHFEU) in order to prescribe the best available information on management practices. For more information please visit http://dnr.wi.gov/forestry/ecolandclass/index.htm. <p>The Department of Natural Resources (DNR) also divides and classifies lands into 22 different Geographical Management Units (GMUs). This classification system identifies the watershed (river, stream, lake) in which surface water will drain. The classification system also identifies the general property characteristics of that watershed, including the amount of agricultural, forest, wetland, urban and other land uses. Information on the GMU also breaks down the amount of forest land into the common timber and habitat types. This information is used in the development of management practices. For more information on GMUs and their characteristics, please visit http://dnr.wi.gov/forestry/gmu/index.htm. Note: DNR is currently revising its web sites, so links to GMUs will likely change in the near future.</p> <ul style="list-style-type: none"> • Landscape-level considerations – The Endangered Resources Program provides excellent tools for forest managers to learn about resource management of species of greatest conservation need. Many of the recommendations provide landscape level consideration. • Past land uses of the forest – Significant past land uses can be relayed to the landowner through text boxes on the management plan template or through venues outside of the management plan. Historical data is found in the landowner's file, which is often reviewed to understand the past and predict the future accurately. • Legal history and current status – Deeds, and other documents that show past ownership and current land uses. This information is used to establish clear title to lands and obtain the proper landowner and lien holder signatures. • Socio-economic conditions – Web links for socio-economic considerations are found in the management plan template. These conditions provide background materials to landowners and forest managers and help in determining operability of management practices. • Cultural issues – Archeological and historical checks must be made on MFL lands. Management practices are prescribed to mitigate negative impacts. • Tribal and customary use issues – These items are rarely raised on MFL lands not in tribal ownership. • Other relevant details that explain or justify management prescriptions – Text boxes are available for plan writers to notify future forest manager of information needed to justify deviations in commonly accepted practices or to point out land characteristic of 	
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		<p>special concern to society or the landowner.</p> <ul style="list-style-type: none"> • Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used. – Silvicultural systems and management prescriptions are template choices. These choices must be made after evaluation of the current stand conditions and desired future stand conditions. All maps, documents, guidelines and resources are evaluated to determine the direction of land management to meet landowner and program goals. • Description of harvest limits (consistent with Criterion 5.6) and species selection. – Harvest schedules are determined and reflected in the stand mapping and creation of timber stands. Landowners with enough acreage to divide harvest acres into smaller units are able to create separate stand boundaries. Harvest dates are scheduled based on projected growth rates and target basal areas. Harvest dates for even aged timber types are determined based on age of the stand. <p>The management plan template allows for natural or forced conversion to a different timber type. Foresters work with landowners to determine conversion potential and species selection. Foresters choose the proper selection in the management plan template and list the species target for conversion.</p> <ul style="list-style-type: none"> • Description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate. - Documents used to determine when harvesting or thinning prescriptions are listed in the management plan with a link to the public web site if more information is requested. The main document used is the Silviculture Handbook, although many other documents influence the actual harvest date to meet other resource management goals. • Description of environmental assessment and safeguards based on the assessment, including approaches to: <ol style="list-style-type: none"> 1. Pest and weed management – Site evaluations occur to determine chemical or mechanical pest and weed management options. Many pest management options may be resolved through harvesting or accepting a certain amount of tree loss. Weed management options are prevalent in tree plantations or in natural regeneration of even-aged forested stands. Invasive plant species are prevalent in parts of the state. Active management of these sites will be needed to insure that forests regenerate to desirable tree species. Cost share money through the Wisconsin Forest Landowner Grant Program (WFLGP) is available to offset landowner costs. 2. Fire management – Landowners are allowed to implement Fire Wise recommendations around buildings and cabins to protect structures from wild fires. Lands where mowing or other practices are established are mapped and become part of the 20% of the MFL entry that is unsuitable for growing of timber products. 3. Protection of riparian management zones – All MFL lands are required to follow DNR's BMPs for Water Quality. The MFL management plan template provides a link to the entire BMP manual on the public web site. Specific practices are highlighted and placed in the mandatory practices section of the management plan to highlight special concerns. 4. Description of location and protection of rare, threatened, and endangered species and plant community types. – Wisconsin Department of Natural Resources uses the National Heritage Inventory (NHI) database to determine locations of rare and threatened plant and animal species. This database is protected from the open records law and is not available for 	
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		<p>publication in the MFL management plan. Older plan have references to specific NHI species on the landowner's management plan, but this data cannot be shared with people other than the landowner. Landowners, CPWs and cooperating foresters who have taken training on protection of the NHI data are allowed access to this data, as it is required for landowners to protect NHI species on their property. Management practices must be mitigated to protect these resources at the time of implementation. Some NHI species management plans may preclude acreage from being enrolled in the MFL program if no management zones make the entire MFL acreage exceed the 20% limit.</p> <p>5. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8. – Management plans do not describe monitoring procedures; however monitoring is a part of the MFL program. Databases, such as Plantrac and WisFIRS are the mechanisms for monitoring land management activities on MFL lands. Landowners are reminded of upcoming mandatory practices and referred to cooperating foresters for implementation. DNR foresters monitor the progress of these mandatory practices through contact with landowners, cooperating foresters, loggers, contract crews (tree planting, cultural work) and other venue. DNR foresters establish each practice in Plantrac as needed, established, completed or closed. New harvest or practice dates are established when current practices are completed or closed.</p> <p>Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected areas in a manner that clearly relates to the forest description and management prescriptions. –MFL entries have a site specific map that includes property boundaries, land cover types, hydrologic features, roads, and adjoining land use. Use rights are not included on the map since these rights are indicated on a landowner's deed(s) or easement documents. DNR is researching GIS capabilities form the MFL program through the WisFIRS program. If GIS capabilities can be created adjacent land use, planned management activities, property boundaries, roads, forest types by age class, topography, soils, cultural, riparian zones and other items can be identified on a landscape scale map.</p>	
Principle 8			
8.1.a	Yes	<p>Management plans do not include a schedule for monitoring, but key elements of monitoring are built into a comprehensive, annual WI DNR program state-wide that incorporates the MFL property holdings. WI DNR has many programs related to monitoring at an organizational level (e.g., internal management systems that include performance and program reviews, private forestry program reviews with stakeholder input). At the State-level, WI DNR does biotic monitoring through FIA, wildlife surveys, forest health surveys, endangered resources surveys, etc. The Land Legacy Report and the Statewide Forest Plan are examples of documented, state-wide monitoring. Some state-wide BMP monitoring can be specifically associated with the MFL program, amongst other forest use groups.</p> <p>In association with the American Tree Farm System Group Certification, WI DNR has conducted annual internal audits (2006 - 2011) to determine landowner compliance with the MFL program and the Tree Farm standards. A certification checklist is used to record and document objective evidence and findings for each Tree Farm performance measure and indicator. In a manner somewhat similar to this SW assessment, WI DNR randomly chooses a county to audit. These self-audit system have been inadequate for ensuring</p>	

		<p>compliance with certain Indicators (see finding in App VII and NCR 01/11).</p> <p>Formal monitoring on individual MFL properties is accomplished prior to management plan preparation through reconnaissance and data collection at the time of entry into MFL and renewal (at 25 or 50 years), when mandatory practices are scheduled (including harvest and regeneration) as well as post-harvest. Written monitoring documents include the management plan and associated forms, and cutting notice and cutting report (Form 2450-032).</p> <p>Informal monitoring is done by individual forester visits (both DNR and Cooperating Forester personnel), by the landowner, and by management activity contractors. Larger scale monitoring of the MFL program is accomplished through scheduled periodic certification audits for the American Tree Farm System, and the Forest Stewardship Council.</p> <p>Internal audit procedures, templates and examples of resulting CARs from internal audits were provided to auditors.</p>	
8.2.a.2	Yes	<p>Yield of forest timber products must be provided to DNR at the conclusion of a cutting operation. Landowners keep their own records of non-timber products.</p> <p>(1) While volume control systems are generally used on MFL lands via silviculture (e.g., stand-level control of basal area), timber growth and mortality are not recorded, but this lack of record was judged as not be critical given the small scale of forests.</p> <p>(2) Stocking of stands is described at the time that the management plan development. Stands are classed by tree species composition, average tree size, and merchantable volume of trees. Regeneration is informally accounted for in some stand descriptions</p> <p>(3) Stand-level and forest-level composition and structure are established and recorded in manner similar to (2) above. Stands are classed by tree species composition, average tree size, and merchantable volume of trees. Standard forest cover designations are used to classify stands. Ecological classification systems are used to describe MFL properties in context of the surrounding landscape (in plans developed since 1990).</p> <p>(4) Terrestrial and aquatic features are recorded on property maps. Some of these features are included in the stand descriptions of environmental conditions.</p> <p>(5) Soil conditions are described in management plan, often in the stand descriptions of environmental conditions.</p> <p>(6) Pest conditions are described in management plan, often in the stand descriptions of environmental conditions.</p>	
8.2.c	Yes	<p>Major habitat elements are addressed in general terms through links to website information (see OBS 04/09). Rare species information is based on NHI data, and updated when management activities are proposed. Initial monitoring occurs during management plan preparation when the Natural Heritage Inventory working list is queried by the DNR forester to determine the presence of rare, threatened and endangered (RTE) species and communities. Information including the species and recommended protection measures are communicated to the Independent Certified Plan Writer for inclusion in the management plan for the landowner. Due to privacy concerns, any information included in the management plan is blacked out on file copies held by</p>	

		<p>the DNR. Additional monitoring occurs when a mandatory practice is scheduled. The NHI working list is again consulted to note the presence of RTE species and communities, and if there are occurrences, that information along with recommended protection measures is communicated to the landowner.</p> <p>Monitoring for the presence of invasive species is done during initial field reconnaissance, mandatory practice assessments, and other visits to the property. Targeted monitoring would be done if the DNR forester or cooperating forester were alerted by DNR Forest Health Specialists or other personnel to the possible presence of an invasive species. The presence and location of protected areas, set-asides, and buffer zones is determined during initial reconnaissance for the management plan, assessment prior to initiation of a mandatory practice, and following a mandatory practice, particularly in the case of established Riparian Management Zones along water features. Due to the rarity of HCV forests on privately-owned lands, stands on individual MFL properties would more commonly have HCV-like attributes (relict and old growth, extended rotation, reserve managed) and would be described in the management plan. If the HVC forests are working forests, mandatory practices are scheduled as required. Extended rotation for certain species or species associations can be a landowner objective and can be incorporated into the management plan. Monitoring occurs at the time of practice or activity initiation. If stands with HCV-like attributes were set aside or deemed no-management stands, their presence would be included within the non-productive area of the property, and would be subject to the eligibility rules for entry into the MFL program.</p> <ul style="list-style-type: none"> • WI DNR Forest Tax Law Handbook (2450.5) • WI DNR Old-growth and Old Forests Handbook (2480.5) • NR 46, Wis. Admin. Code • Ch. 77, Wis. Stats. 	
Principle 9			
Principle 10			
General	N/A	<p>The 2008 FSC assessment report found that Principle 10 was not applicable. The 2008 audit team concluded “<i>WIDNR does not manage plantation forests as defined by FSC. Plantings on MFL potential group lands are mostly red pine and total more than 100,000 acres (~5 percent of potential group lands). All of these plantings were described by WIDNR as being primarily established to convert abandoned, often degraded, agricultural lands to forest. These types of plantings continue to be established using native conifer species, including both red pine and jack pine. Long rotations are used to produce normal, natural forest goods and services.</i>”</p> <p>This principle was not Audited 2009 or 2010.</p> <p>During the 2011 the audit team visited several planted sites and also considered if even-aged management in naturally regenerated stands were created “plantations” as defined by the FSC. The current FSC-US definition of plantation and FSC-US v.1.0 Appendix G Plantation Classification guidance was used for the 2011 audit. Findings:</p> <ul style="list-style-type: none"> • New plantings are limited to native species and clonal material is not used. These plantings occur infrequently and in most cases are restoration of forest on old fields. • Red pine and white pine were the primary species observed in older planted stands (25-60 years old). These were also established on old fields. While typically planted as single species stands, patches are small (most less than 20 acres) and are being invaded by mixed species of trees, shrubs, and herbaceous cover. Understory density and species diversity vegetation typically increases with each successive thinning. No planted 	

		stands observed by the auditor in three years of MFL auditors have reached rotation age, but WIDNR foresters assume that most landowners will allow natural regeneration to occupy the site and will not replant the stands. In sum, the audit team has concluded that no areas on MFL lands are being managed as "plantations" as defined by the FSC-US.	
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APPENDIX V: Chain-of-Custody Conformance (confidential)

Note: This CoC Appendix is used for FMEs only selling standing timber, stumpage, logs and/or chips produced within a FMU covered by the scope of the certificate. FME certificate scopes that include primary or secondary processing facilities shall include an evaluation against the full FSC CoC standard: FSC-STD-40-004 V2. Refer to that separate report Appendix.

Definition of Forest Gate: (check all that apply)

<input checked="" type="checkbox"/>	Standing Tree/Stump: FME sells standing timber via stumpage sales.
<input checked="" type="checkbox"/>	The Log Landing: FME sells wood from the landing/yarding area.
<input type="checkbox"/>	On-site Concentration Yard: Transfer of ownership occurs at a concentration yard under the control of the FME.
<input type="checkbox"/>	Off-site Mill/Log Yard: Transfer of ownership occurs when offloaded at purchaser's facility.
<input type="checkbox"/>	Other: <i>explanation</i>
Comments: Most sales are stumpage sales. Landowners who cut their own wood sell it at the landing.	

Scope Definition of CoC Certificate:

Does the FME further process material before transfer at forest gate? <i>(If yes then processing must be evaluated to full CoC checklist for CoC standard FSC-STD-40-004 v2.)</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Note: This does not apply to on-site production of chips/biomass from wood harvested from the evaluated forest area.	
Comments:	
Is the FME a large scale operation (>10,000 hectares) or a Group Certificate? <i>(If yes then CoC procedures for all relevant CoC criteria shall be documented.)</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: FME manages a group certificate.	
Does non-FSC certified material enter the scope of this certificate prior to the forest gate, resulting in a risk of contamination with wood from the evaluated forest area (e.g. FME owns/manages both FSC certified and non-FSC certified FMUs)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments:	
Does FME outsource handling or processing of FSC certified material to subcontractors (i.e. milling or concentration yards) prior to transfer of ownership at the forest gate? <i>(If yes a finding is required for criterion CoC 7 below.)</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments:	
Does FME purchase certified wood from other FSC certificate holders and plan to sell that material as FSC certified? <i>(If yes then a separate CoC certificate is required that includes a full evaluation of the operation against FSC-STD-40-004 v2.)</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments:	
Does FME use FSC and/or Rainforest Alliance trademarks for promotion or product labeling? <i>(If FME does not nor has no plans to use FSC/RA trademarks delete trademark criteria checklist below.)</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: WIDNR uses the trademarks on the WIDNR Web site but has not used them on printed material or on products.	

Annual Sales Information

Total Sales/ Turnover	16,497,102 US\$
Volume of certified product sold as FSC certified (i.e. FSC claim on sales documentation) (previous calendar year)	1,554,263 m3
Value of certified product sold as FSC certified (i.e. FSC claim on sales documentation) (previous calendar year)	16,497,102 US\$

Chain-of-Custody Criteria [FM-35 SmartWood Chain-of-Custody Standard for Forest Management Enterprises (FMEs)]

1. Quality Management	
<p>COC 1.1: FME shall define the personnel/position(s) responsible for implementing the CoC control system.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: WIDNR has defined responsibilities of all persons responsible for implementing the CoC control system. The COC control system included at page 21-13 of the Forest Tax Law handbook.</p>	
<p>COC 1.2: All relevant staff shall demonstrate awareness of the FME's procedures and competence in implementing the FME's CoC control system.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: WIDNR has training with service foresters to describe the chain of custody system. Foresters demonstrated knowledge of the system through proper use of the certification code and checkbox on the Cutting Notice forms.</p>	
<p>CoC 1.3: FME procedures/work instructions shall provide effective control of FSC certified forest products from standing timber until ownership is transferred at the forest gate. <i>Note: For large scale operations (>10,000ha) and Group Managers, CoC procedures covering all relevant CoC criteria shall be documented.</i> Including:</p> <ul style="list-style-type: none"> a) Procedures for physical segregation and identification of FSC certified from non-FSC certified material. (If applicable) b) Procedures to ensure that non-FSC certified material is not represented as FSC certified on sales and shipping documentation. (If applicable) c) Procedures to include FME FSC certificate registration code and FSC claim (FSC Pure) on all sales and shipping documentation for sales of FSC certified products. d) Recordkeeping procedures to ensure that all applicable records related to the production and sales of FSC certified products (e.g. harvest summaries, sales summaries, invoices, bills of lading) are maintained for a minimum of 5 years. e) Procedures to ensure compliance with all applicable FSC/Rainforest Alliance/SmartWood trademark use requirements. 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: Written procedures under "Chain of Custody" in the Forest Tax Law handbook address elements a-e.</p>	
2. Certified Material Handling and Segregation	
<p>COC 2.1: FME shall have a CoC control system in place to prevent the mixing of non-FSC certified materials with FSC certified forest products from the evaluated forest area, including:</p> <ul style="list-style-type: none"> a) Physical segregation and identification of FSC certified from non-FSC certified material. b) A system to ensure that non-FSC certified material is not represented as FSC certified on sales and shipping documentation. 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>Note: If no outside wood is handled by FME within scope of certificate, mark as N/A.</p>	
<p>Findings: Most sales are low risk, involving a harvest of a single group member's land with no risk of mixing. However, some sales may occur where adjacent lots under a single ownership are being harvested by one contractor where one lot is in MFL certified group and the adjacent lot is not in the MFL group. In that case the Forest Tax Law Handbook specifies that a) physical segregation of the logs is required, and b) non-MFL wood cannot be classified as certified, and c) the page of the cutting notice displaying the CoC certificate number given to buyers who wish to establish a CoC documentation chain is only applicable to the MFL group lot.</p>	
<p>CoC 2.2: FME shall identify the sales system(s) or "Forest Gate", for each FSC certified product covered by the Chain of Custody system: i.e. standing stock; sale from log yard in the forest; sale at the buyer's gate; sale from a log concentration yard, etc.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: The forest gate has been identified as the "stump, landing, or roadside." For the purposes of the certificate SmartWood considers the landing and roadside to be equivalent</p>	
<p>CoC 2.3: FME shall have a system that ensures that FME products are reliably identified as FSC certified (e.g. through documentation or marking system) at the forest gate.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: The certificate number on the Cutting Notice as described in CoC 2.1 serves this purpose.</p>	
<p>CoC 2.4: FME shall ensure that certified material is not mixed with non-FSC certified material at any stage, up to and including the sale of the material.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>Note: If no outside wood is handled by FME within scope of certificate, mark as N/A.</p>	

Findings: See CoC 2.1

3. Certified Sales and Recordkeeping

CoC 3.1: For material sold with FSC claim the FME shall include the following information on sales and shipping documentation:

- a) FME FSC certificate registration code, and
- b) FSC certified claim: FSC Pure

Yes No

Findings: a) WIDNR has revised its procedures to clarify that all wood is sold as FSC certified. The FSC certification code is included on the cutting notice.
b) "FSC Pure" is included on the cutting notice along with the certification code.

CoC 3.2: FME shall maintain certification production and sales related documents (e.g. harvest summaries, invoices, bills of lading) for a minimum of 5 years. Documents shall be kept in a central location and/or are easily available for inspection during audits.

Yes No

Findings: WIDNR's paper records retention policy is seven years. The electronic data is never deleted.

CoC 3.3: FME shall compile an annual report on FSC certified sales for SmartWood containing monthly sales in terms of volume of each FSC certified product sold to each customer.

Yes No

Findings: All wood is sold as FSC-certified. WIDNR compiles summaries of sales volume and value (based on WIDNR stumpage rate values) of all forest products sold by the entire FSC group and has the capability to produce reports for any time period and for all customers upon request

4. Outsourcing

CoC 4.1: FME control system shall ensure that CoC procedures are followed at subcontracted facilities for outsourcing and FME shall collect signed outsourcing agreements covering all applicable FSC outsourcing requirements per FSC--40-004 v-2.0 *FSC Standard for Chain of Custody* November 2007.

Note 1: If FME outsources processing or handling of FSC certified material the outsourcing report appendix is required.

Note 2: Check N/A If FME does not outsource processing or handling of FSC material.

Yes No
N/A

Findings: There is no outsourcing.

FSC/Rainforest Alliance Trademark (TMK) Use Criteria

Standard Requirement:

The following section summarizes the FME's compliance with FSC and Rainforest Alliance trademark requirements. Trademarks include the Forest Stewardship Council and Rainforest Alliance/SmartWood names, acronyms (FSC), logos, labels, and seals. This checklist is directly based on the FSC labeling standard (FSC-STD-40-201 *FSC on-product labeling requirements* (version 2.0) and FSC-TMK-50-201 V1-0 *FSC Requirements for the Promotional Use of the FSC Trademarks by FSC Certificate Holders*. References to the specific FSC document and requirement numbers are included in parenthesis at the end of each requirement. (Rainforest Alliance Certified Seal = RAC seal).

General

CoC 5.1: FME shall have procedures in place that ensure all on-product and off product FSC/Rainforest Alliance trademark use follows the applicable policies:

Yes No

Findings: Procedures are described in the Forest Tax Law handbook "Chain of Custody" section. The Forest Certification Coordinator contacts SmartWood for use of trademarks on the WIDNR website.

CoC 5.2: FME shall have procedures in place and demonstrate submission of all FSC/Rainforest Alliance/SmartWood claims to SmartWood for review and approval prior to use, including:

- a) On-product use of the FSC label/RAC seal;
- b) Promotional (off-product) claims that include the FSC trademarks ("Forest Stewardship Council", "FSC", checkmark tree logo) and/or the Rainforest Alliance/SmartWood trademarks (names and seal)(50-201,2.3).

Yes No

Findings: Certification is mentioned on the WIDNR website but not on any printed material. WIDNR obtained SmartWood approval for trademark use. There were no new uses since the last annual audit.

COC 5.3: FME shall have procedures in place and demonstrates that all trademark review and approval correspondence with SmartWood is kept on file for a minimum of 5 years (40-201, 1.10; 50-201, 2.4):

Yes No

Findings: All approval records are maintained by WIDNR. Long-term records are kept in electronic backup for greater than 5 years.

Off-product / Promotional

Check if section not applicable (FME does not, and does not plan to use the FSC trademarks off-product or in promotional pieces)

Note: promotional use items include advertisements, brochures, web pages, catalogues, press releases, tradeshow booths, stationary templates, corporate promotional items (e.g., t-shirts, cups, hats, gifts).

When applicable to the FME's promotional/off-product use of the trademarks, the criteria below shall be met:

Yes No

Findings: Trademark use by WIDNR has been approved by SmartWood. A WIDNR website search by the auditor indicated conformance with CoC 5.4-5.9.

COC 5.4: If the FSC trademarks are used for promotion of FMUs, FME shall limit promotion to FMUs covered by the scope of the certificate.

COC 5.5: In cases that the Rainforest Alliance trademarks are used (50-201, 13.1, 13.2):

- a) The FSC trademarks shall not be at a disadvantage (e.g., smaller size);
- b) The FSC checkmark tree logo shall be included when the RAC seal is in place.

COC 5.6: In cases that the FSC trademarks are used with the trademarks (logos, names, identifying marks) of other forestry verification schemes (SFI, PEFC, etc.), SmartWood approval shall be in place (50-201, 3.0).

COC 5.7: Use of the FSC trademarks in promotion of the FME's FSC certification shall not imply certain aspects are included which are outside the scope of the certificate (50-201, 1.6).

COC 5.8: Use of the FSC trademarks on stationery templates (including letterhead, business cards, envelopes, invoices, paper pads) shall be approved by SmartWood to ensure correct usage (50-201, 12.0).

COC 5.9: In cases that the FSC trademarks are used as part of a product name, domain name, and/or FME name, SmartWood approval shall be in place (50-201, 9.0, 10.0).

On-product

Check if section not applicable (FME does not, and does not plan to apply FSC labels on product)

APPENDIX VI: SmartWood Database Update Form

Instructions: For each FSC certificate, SmartWood is required to upload important summary information about each certificate to the FSC database (FSC-Info). During each annual audit SW auditors should work with the certificate holder to verify that the information posted on FSC-Info is up to date as follows:

1. Print out current Fact Sheet prior to audit from FSC-Info website or direct link to fact sheets (<http://www.fsc-info.org>)
2. Review information with the FME to verify all fields are accurate.
3. If changes are required (corrections, additions or deletions), **note only the changes** to the database information in the section below.
4. The changes identified to this form will be used by the SW office to update the FSC database.

Is the FSC database accurate and up-to-date? YES NO
(if yes, leave section below blank)

Client Information (contact info for FSC website listings)

Organization name			
Primary Contact		Title	
Primary Address		Telephone	
Address		Fax	
Email		Webpage	

Forests

Change to Group Certificate	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Change in # of parcels in group	1086 total members
Total certified area		974,144 Hectares (or)	Acres

Species (note if item to be added or deleted)

Scientific name	Common name	Add/Delete

Products

Product type	Description	Add/Delete

APPENDIX VII: Group management conformance checklist *FSC-STD-30-005 v1-0* (confidential)

Group Certification Division of Responsibilities

Type of Forest Management Group:	Type I group	
Forest Management Activity	Group Entity	Group Member
Forest management planning	<input checked="" type="checkbox"/>	<input type="checkbox"/>
FMU monitoring activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Forest and resource inventory	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Harvest planning	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Harvesting	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Training of forest workers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Legal compliance (taxes, permitting, etc)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Timber Sales	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marketing	<input type="checkbox"/>	<input checked="" type="checkbox"/>
FSC/RA trademark use (if applicable)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Summary of division of responsibilities: Responsibilities for all parties are spelled out in Chapter 21 of the Forest Tax Law handbook.		

Quality System Requirements

1.0 General Requirements	
1.1 The Group entity shall be an independent legal entity or an individual acting as a legal entity.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings required if No:	
1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings required if No:	
1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings required if No: DNR has language in the Forest Tax Law Handbook documenting its commitment to the FSC Principles and Criteria (Chapter 21-1).	
1.4 The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Legal or regulatory authority for WI DNR is presented in Section 77.80 of the Wisconsin Statutes. The Forest Tax Law Handbook (2450.5) provides detailed instructions on the administration of the MFL program. WI DNR staff are adequately qualified, trained and equipped to carry out their MFL program responsibilities.	
2.0 Responsibilities	
2.1 The Group entity shall clearly define and document the division of responsibilities between the Group entity and the Group members in relation to forest management activities (for example with respect to management planning, monitoring, harvesting, quality control, marketing, timber sale, etc).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
NOTE: The actual division of responsibilities may differ greatly between different group certification schemes. Responsibilities regarding compliance to the applicable Forest Stewardship Standard may be divided between the Group entity and Group	

members in order to take into account of a landscape approach.	
Findings: The Forest Tax Law Handbook (2450.5) provides detailed instructions on the administration of the MFL program. Responsibilities for all parties are detailed out in Chapter 21 of the Forest Tax Law handbook.	
2.2 The Group entity shall appoint a management representative as having overall responsibility and authority for the Group entity's compliance with all applicable requirements of this standard.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Legal or regulatory authority for WI DNR is presented in Section 77.80 of the Wisconsin Statutes. The Forest Tax Law Handbook (2450.5) provides detailed instructions on the administration of the MFL program.	
2.3 Group entity staff and Group members shall demonstrate knowledge of the Group's procedures and the applicable Forest Stewardship Standard.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: WI DNR staff are adequately qualified, trained and equipped to carry out their MFL program responsibilities.	
3.0 Group Entity Procedures	
3.1 The Group entity shall establish, implement and maintain written procedures for Group membership covering all applicable requirements of this standard, according to scale and complexity of the group including: <ul style="list-style-type: none"> I. Organizational structure; II. Responsibilities of the Group entity and the Group members including main activities to fulfill such responsibilities (i.e. Development of management plans, sales and marketing of FSC products, harvesting, planting, monitoring, etc); III. Rules regarding eligibility for membership to the Group; IV. Rules regarding withdrawal/ suspension of members from the Group; V. Clear description of the process to fulfill any corrective action requests issued internally and by the certification body including timelines and implications if any of the corrective actions are not complied with; VI. Documented procedures for the inclusion of new Group members; VII. Complaints procedure for Group members. 	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: WIDNR has written procedures for Group membership as described in Chapter 21 of the Forest Tax Law handbook that covers all applicable requirements, rules and process descriptions are readily and publicly available on WIDNR websites (http://dnr.wi.gov/forestry/feeds/faqsFull.asp?s1=ForestTax&s2=MFL&inc=ftax)	
3.2 The Group entity's procedures shall be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: WIDNR has procedures in place for conducting internal inspections, addressing non-conformance identified in such inspections, actions taken to correct any non-conformance. Relevant documents regarding internal control systems were provided to auditors. Examples of completed internal audits and corrective actions were provided to auditors.	
3.3 The Group entity shall define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Responsibilities for all parties are detailed out in Chapter 21 of the Forest Tax Law handbook and WIDNR staff are adequately qualified, trained, and equipped to carry out their MFL program responsibilities.	
3.4 The Group entity or the certification body (upon request of Group entity and at the Group entities expense) shall evaluate every applicant for membership of the Group and ensure that there are no major nonconformities with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the Group, prior to being granted membership of the Group.	Yes <input type="checkbox"/> No <input type="checkbox"/>
NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.	
Findings: WI DNR has established mechanisms to evaluate candidate members to ensure there are no nonconformities and to determine any requirements necessary through the required forest management plan	

process.	
4.0 Group Member Informed Consent	
<p>4.1 The Group entity shall provide each Group member with documentation, or access to documentation, specifying the relevant terms and conditions of Group membership. The documentation shall include:</p> <ul style="list-style-type: none"> I. Access to a copy of the applicable Forest Stewardship Standard; II. Explanation of the certification body's process; III. Explanation of the certification body's, and FSC's rights to access the Group members' forests and documentation for the purposes of evaluation and monitoring; IV. Explanation of the certification body's, and FSC's requirements with respect to publication of information; V. Explanation of any obligations with respect to Group membership, such as: <ul style="list-style-type: none"> a. maintenance of information for monitoring purposes; b. use of systems for tracking and tracing of forest products; c. requirement to conform with conditions or corrective action requests issued by the certification body and the group entity d. any special requirements for Group members related to marketing or sales of products within and outside of the certificate; e. other obligations of Group membership; and f. explanation of any costs associated with Group membership. 	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>Findings: Links to the applicable FSC standard and certification process are included at http://dnr.wi.gov/forestry/certification/mfl.html. This URL and a hot link are included in the new management plan template. Additional Group membership requirements are included as explained in 4.2 below.</p>	
<p>4.2 A consent declaration or equivalent shall be available between the Group Entity and each Group member or the member's representative who voluntarily wishes to participate in the Group. The consent declaration shall:</p> <ul style="list-style-type: none"> I. include a commitment to comply with all applicable certification requirements; II. acknowledge and agree to the obligations and responsibilities of the Group entity; III. acknowledge and agree to the obligations and responsibilities of Group membership; IV. agree to membership of the scheme, <i>and</i> V. authorize the Group entity to be the primary contact for certification and to apply for certification on the member's behalf. <p>NOTE: A consent declaration does not have to be an individual document. It can be part of a contract or any other document (e.g. meeting minutes) that specifies the agreed relationship between the Group member and the Group entity.</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>Findings: New and renewing MFL members.</p> <p>I-V.: In signing the MFL application and management plan the landowner agrees to MFL requirements, which includes the obligations and responsibilities of group membership. The details of these requirements are provided in the DNR certification web link http://dnr.wi.gov/forestry/certification/MFL.html. Landowners may opt out of the FSC group. Signing the management plan is a 25-year commitment to DNR and FSC requirements. The application and management form authorize DNR's enrollment of the property in the certified group. The signed application authorizes DNR and "its agents" (FSC, SmartWood, or others designated by DNR) to access the property.</p>	
5.0 Group Records	
<p>5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include:</p> <ul style="list-style-type: none"> I. List of names and contact details of Group members, together with dates of entering and leaving the Group scheme, reason for leaving, and the type of forest ownership per member; II. Any records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard; 	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<p>III. A map or supporting documentation describing or showing the location of the member's forest properties;</p> <p>IV. Evidence of consent of all Group members;</p> <p>V. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems);</p> <p>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 non-compliance;</p> <p>VII. Records of the estimated annual overall FSC production and annual FSC sales of the Group.</p> <p>NOTE: The amount of data that is maintained centrally by the Group entity may vary from case to case. In order to reduce costs of evaluation by the certification body, and subsequent monitoring by FSC, data should be stored centrally wherever possible.</p>	
<p>Findings: All relevant records described in GR 5.1 I-VII are maintained by WIDNR. Historically WIDNR has relied on a paper record system based in the county offices with summary data maintained at the Madison office. DNR is moving to a fully electronic system for all management plans, maps, and other records (WisFIRS) which was be operational in 2011. Although progress has been made on the new database system, it is not yet complete for FML use as of September 2012.</p>	
<p>5.2 Group records shall be retained for at least five (5) years.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: Group records are maintained over five years via paper records and electronic databases.</p>	
<p>5.3 Group entities shall not issue any kind of certificates or declarations to their group members that could be confused with FSC certificates.</p> <p>NOTE: Group member certificates may however be requested from SmartWood.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: WIDNR is aware of and acknowledges this requirement.</p>	

Group Features

<p>6.0 Group Size</p>	
<p>6.1 The Group entity shall have sufficient human and technical resources to manage and control the Group in line with the requirements of this standard.</p> <p>NOTE: The number of Group members, their individual size and the total area will influence the evaluation intensity applied by the certification body in their annual audits.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: WIDNR staff are adequately qualified, trained, and equipped to carry out their MFL program responsibilities.</p>	
<p>6.2 The Group entity shall specify in their procedures the maximum number of members that can be supported by the management system and the human and technical capacities of the Group entity.</p> <p>Findings: WIDNR evaluates program capacity annually, rather than define a maximum number of members. During future annual audits of WIDNR, SmartWood will follow the FSC protocol for sampling intensity. Future evaluations will focus on group members who have not been visited by a SmartWood auditor, as well as those group members who have had recent, active or proposed management activities taking place. In addition, properties affiliated with any NCRs or OBSs will likely be visited. Additional considerations for the auditing strategy will be based on any stakeholder comments.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>7.0 Multinational Groups</p>	
<p>7.1 Group schemes shall only be applied to national groups which are covered by the same Forest Stewardship Standard.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/></p>
<p>Findings required if No:</p>	

7.2 The Group entity shall request formal approval by FSC IC through their accredited Certification Body to allow certification of such a group scheme.	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
Findings required if No:	

Internal Monitoring

8.0 Monitoring Requirements	
8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following: <ol style="list-style-type: none"> I. Written description of the monitoring and control system; II. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with any additional requirements for membership of the Group. 	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>Findings: A monitoring team that includes staff members from WIDNR's central office and regional staff members annually monitor applications of the certification program in one region of the state. The audits are three days in length and cover three counties, and include a morning county office audit covering records and procedures and an afternoon field audit visiting several MFL properties. Results from that monitoring are used to generate internal corrective actions for WIDNR to address regional conformance issues and system-wide issues, to generally improve the system. WIDNR has developed a new monitoring form to be used during the annual monitoring that includes all Criteria and Indicators of the FSC Standard as well as applicable Chain of Custody and Group Certification procedures. This monitoring procedure was to be tested in November 2009.</p>	
8.2 The Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>Findings: Group Certification Criterion 8.2 requires that the Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.</p> <p>MFL monitors for conformance with environmental and harvesting rules for site disturbing activities and invasive species control. DCR also samples properties for conformance with USFS Stewardship Plan requirements, but these may not include Group properties and the criteria for that monitoring do not address all FSC requirements (NCR 02/11). Specific Group entity monitoring gaps identified included:</p> <ol style="list-style-type: none"> 1. Pesticide monitoring by group manager <ul style="list-style-type: none"> • DNR is not monitoring pesticide use on wildlife food plots within MFL lands. Some food plots observed were intensively managed plots using agricultural techniques. The lack of weeds and typical agricultural practice suggests that herbicides are likely used on these plots. Examples include an MFL entry in Chippewa County where a corn food plot was observed, and another in Clark County where a food crop of annuals (turnips or rape) was observed. Discovered during additional landowner interviews were unreported use of non-hazardous and a prohibited herbicide. • In 2009, WIDNR settled CAR 06/08 regarding unauthorized and unreported uses of pesticides with the development of policy and educational information responding to similar unreported/unauthorized use of pesticides classified by the FSC as Highly Hazardous (HH) and non-HH pesticides. WIDNR's efforts included communication with service foresters, cooperating foresters and landowners. In 2009 landowners had received mailings with links to lists of prohibited pesticides but in the interviews conducted during this audit landowners were either unaware of these lists or, in one case, had decided to ignore it. • In settling CAR 06/08, WIDNR also developed a plan to implement an "annual sampling by mail survey of MFL Group members that have recommended practices that are likely to include pesticide use. The responses will be used to gauge the effectiveness of a pesticide information and education campaign and conformance to the FSC restrictions and make adjustments as necessary" (2009 audit report, evidence to close CAR 06/08). This sampling has not occurred. It is not clear that county foresters are routinely inquiring about pesticide use when they are in contact with landowners, which was an additional element of the evidence to close CAR 06/8. 	

- 2. Safety equipment monitoring use by harvesting contractors. 4.2.b
 - DNR is not monitoring use of safety equipment by chainsaw operators. Examples include at least 3 active harvest operations where chainsaw operators were not using chainsaw safety chaps.
- 3. Hazardous spill equipment use by harvesting contractors monitoring by group manager. 6.7.a.
 - Over 75% of loggers observed or interviewed on field audit sites did not have the equipment necessary to respond to hazardous spills.
- 4. As evidence to close CAR 12/08, in 2009 WIDNR developed a template for annual internal monitoring to the FSC standard (at that time the FSC-US Lakes States Standard). OBS 08/09 was issued because the template had not yet been implemented. That monitoring procedure has not been updated to the current FSC standard and has not been implemented.

8.3. The minimum sample to be visited annually for internal monitoring shall be determined as follows:

a) Type I Groups with mixed responsibilities (see FSC-STD-30-005 v-1 section D Terms and definitions)
 Groups or sub-groups with mixed responsibilities shall apply a *minimum* sampling of $X = \sqrt{y}$ for 'normal' FMUs and $X = 0.6 * \sqrt{y}$ for FMUs < 1,000 ha. Sampling shall be increased if HCVs are threatened or land tenure or use right disputes are pending within the group.

b) Type II Resource Manager Groups (see FSC-STD-30-005 v-1 section D Terms and definitions)
 Group entities who also operate as resource managers may define the required internal sampling intensity at their own discretion for the forest properties they are managing, independent of their size and ownership (the minimum numbers as defined above do not apply here).

NOTE: for the purpose of sampling, FMUs < 1,000 ha and managed by the same managerial body may be combined into a 'resource management unit' (RMU) according to the proposal made in FSC-STD-20-007 Annex 1.

Yes No

Findings: WIDNR is sampling as required for internal monitoring.

FSC-STD-30-005 recommendations for internal monitoring.

8.4 For monitoring purposes the Group entity should use the same stratification into sets of 'like' FMUs as defined by the certification body in their evaluation.

8.5 The Group entity should visit different members in their annual monitoring than the ones selected for evaluation by the certification body, unless pending corrective actions, complaints or risk factors are requiring a revisit of the same units.

8.6 In the selection process of members to be visited, the Group entity should include random selection techniques.

Comments: For the purposes of the FSC assessment, a "group member" is equivalent to an individual property enrolled in the MFL program, also referred to as "MFL Orders" by WIDNR or "Forest Management Units" (FMUs) in this report thus both the Group entity and certification body stratify "like" FMUs in the same manner. WIDNR provided internal audit documents demonstrating that internal monitoring selected sites not evaluated by the certifying body and included random selections in their sampling protocols.

8.7 The Group entity shall issue corrective action requests to address non-compliances identified during their visits and monitor their implementation.

Yes No

Findings: FME provided internal audit samples including details on corrective actions issued (document Internal Audit CAR 2009-01.doc).

8.8 Additional monitoring visits shall be scheduled when potential problems arise or the Group entity receives information from stakeholders about alleged violations of the FSC requirements by Group members.

Yes No
NA

Findings: FME provided internal audit samples including details on violation investigations.

Group Assessment Requirements: (Completed by SW Task Manager/Lead Auditor)

Group member size restriction:	There are currently no size restrictions.
SW Certificate auditing strategy:	During future annual audits of WIDNR, SmartWood will follow the FSC protocol for sampling intensity. Future evaluations will focus on group members who have not been visited by a SmartWood auditor, as well as those group members who have had recent, active or proposed management activities taking place. In addition, properties affiliated with any NCRs or OBSs will likely be visited. Additional considerations for the auditing strategy will be based on any stakeholder comments.

APPENDIX VII-a: Certified Pool Participation List

Certified Pool Participation List

1. Total # FMUs in the certified pool: 44,281

Total area in Current Pool (ha. or acres): 974,144 hectares

CERTIFIED POOL MEMBERSHIP TABLE

Due to the size of the certified group the table listing all members has not been included in the audit report. WIDNR provided Rainforest Alliance with a complete list of all members and applicable property data.

Note: For the purposes of the FSC assessment, a “group member” is equivalent to an individual property enrolled in the MFL program, also referred to as “MFL Orders” by WIDNR or “Forest Management Units” (FMUs) in this report.