

# **Surveillance Audit Report**

# **American Tree Farm System Group Certification**

# Date June 21, 2012

## A. Name: Wisconsin DNR MFL Tree Farm Group

FRS #: 1Y942

### **B. Scope:**

Enrolled Wisconsin Managed Forest Law Program members. The ATFS Certificate Number is NSF-ATFP-1Y941.

No Change

Changed (see Section H, revised scope statement noted on FRS)

## C. NSF Audit Team:

Lead Auditor: Norman Boatwright Auditors: Mike Ferrucci & Tucker Watts

**D. Audit Dates:** May 21-June 1, 2012

### **E. Reference Documentation:**

Company ATFS Documentation: Forest Tax Law Handbook Date Revised: November 2011

## F. Audit Results: Based on the results at this visit, the auditor concluded

Acceptable with no nonconformances; or

Acceptable with a minor nonconformance that should be corrected before the next regularly scheduled surveillance visit;

Not acceptable with one or two major nonconformances - corrective action required;

Several major nonconformances - the certification may be canceled unless immediate action is taken

## G. Changes to Operations or to the ATFS Standard:

Are there any significant changes in operations, procedures, specifications, FRS, etc. from the previous visit?  $\Box$  Yes  $\boxtimes$  No

If yes, provide brief description of the changes:

### H. Other Issues Reviewed:



Public report from previous audit(s) is posted on AFF web site.

ATFS and other relevant logos or labels are utilized correctly. If no, document on CAR forms. Label is used correctly on the website.

### I. Corrective Action Requests:

Corrective Action Requests issued this visit (through NSF's on-line OASIS audit tool):

1. (List with very brief description, for example "2011-1 Stand Level Retention"...)

Corrective Action Plan is not required.

Corrective Action Plan is required within sixty days of this visit (for Minor Nonconformances). CARs will be verified during the next Surveillance Audit.

Corrective Action Plan is required within thirty days of this visit (for Major Nonconformances). The auditor will make arrangements to verify the corrective action has been effectively implemented. All major nonconformance(s) must be closed by the auditor prior to the next scheduled surveillance audit by a special verification visit or by desk review if possible, or the certificate may be withdrawn.

Your Corrective Action Plans should be provided through your NSF On-line Interface. Any questions should be directed to DeMarrio Boles - Phone: 734-827-5634 or Dboles@nsf-isr.org

At the conclusion of this Surveillance Audit visit, the following CARs remain open: MAJOR(S): 0 MINOR(S): 1 Opportunity For Improvement (OFI) identified: 1

### H. Future Audit Schedule:

Follow-up or Surveillance Audits are required. The next Surveillance Audit is scheduled for June 3-7, 2013. The assigned lead auditor will contact you 2-3 months prior to this date to reconfirm and begin preparations. Recertification must be completed before August 7, 2014.

## **Appendices:**

- Appendix I: Surveillance Notification Letter and Audit Schedule
- Appendix II: Public Surveillance Audit Report
- Appendix III: Audit Matrix and Group Checklist

Appendix IV: ATFS Audit Reporting Form

Appendix I



Surveillance Notification Letter and Audit Schedule



# **DRAFT May 10, 2012**

# Tentative Audit Plan for the Wisconsin DNR MFL Tree Farm Group

### Group Manager: Wisconsin DNR

| Of oup munuger. The one of the      |                            |                                 |
|-------------------------------------|----------------------------|---------------------------------|
| Kathryn J. Nelson, Forest Tax Prog  | gram and Policy Chief      |                                 |
| Private and Community Forest Sec    | tion, Bureau of Forest Man | agement                         |
| Wisconsin Department of Natural     | Resources                  |                                 |
| phone: (608) 266-3545               | fax: (608) 20              | 66-8576                         |
| cell phone: (608) 219-3683          | Kathryn.Nelson@Wiscon      | <u>isin.gov</u>                 |
| Audit Team:                         |                            |                                 |
| Norman Boatwright                   | Cell: 843-229-1851         | boatwright@millikenforestry.com |
| Mike Ferrucci                       | Cell: 203-887-9248         | mferrucci@iforest.com           |
| Tucker Watts                        | Cell: 601-622-6487         | jtwatts1@gmail.com              |
| Beth Jacqmain, Forest Certification | n Coordinator, US Region,  | Rainforest Alliance             |

Cell: 507.649.7097 bjacqmain@ra.org

**Audit Dates:** May 21-25, 2012 (coordinated with the FSC Group Audit) See <u>schedules</u> at the end of this document.

### **Opening meeting**

- Monday May 21, 8 am (then adjourned until Friday May 25 for audit of central functions)
- Participants: Norman Boatwright, others from Wisconsin DNR

### **Certification Objectives:**

- 1. Determine whether the Group Organization's administration and management remains in conformance with the requirements of ATFS Independently Managed Group Certification Requirements (2010-2015) ATFS Document Number: ATFS-IMG- 01.
- 2. Determine whether the forest management of the Group Members is in conformance with the AFF Standards, Core Performance Measures and Primary Indicators.

### Audit Scope:

The scope of the audit, to appear on the certificate, will be as follows:

Enrolled Wisconsin Managed Forest Law Program members.

# The ATFS Certificate Number is NSF-ATFP-1Y941.

### **Performance Measures & Indicators:**

ATFS-IMG- 01: ATFS Independently Managed Group Certification Requirements (2010-2015) AFF STANDARDS (2010 – 2015) Monitoring Checklist

### Overview

A three-person audit team from NSF (supplemented by one auditor from Smartwood) will assess a sample of the members of the Wisconsin MFL Tree Farm Group (all MFL enrollees who have not opted out) against the current requirements of the Tree Farm Program. The Forestry Division of Wisconsin DNR serves as the "Group Manager"; the program will also be assessed against the requirements for Independently Managed Groups. Mike Ferrucci is leading the audit planning and Norman Boatwright will lead

the actual audit and prepare the audit report. Tucker Watts will serve as Team Auditor. Each of these auditors will visit tree farms in 2 counties, for a total of six offices. Norman Boatwright will also review the group manager. Preliminary results will be presented in a closing session on May 25 at 3 pm.

Information on the field tours, including final sites, maps, and itineraries, will be provided by Wisconsin DNR representatives on the first day of the audits. Wisconsin DNR representative will reserve hotels for the auditors and will provide locations to meet each day.

| County  | Auditor           | Dates        |
|---------|-------------------|--------------|
| Rusk    | Norman Boatwright | May28-29     |
| Sawyer  | Norman Boatwright | May 30-June1 |
| Ashland | Tucker Watts      | May 21-22    |
| Iron    | Tucker Watts      | May 23-24    |
| Waupaca | Mike Ferrucci     | May 23-24    |
| Shawano | Mike Ferrucci &   | May 22-23    |
|         | Beth Jacqmain     |              |

### Sampling Plan County Selections and Auditor Assignments:

### Sample methodology and preliminary sample size & configuration:

Sample procedures for ATFS Independent Managed Groups are contained in Accreditation Rule 27, Annex 2, as amended by the "ATFS Sampling Procedures for Regional Groups, IMGs and Individual Certificate holders, Proposed Revisions 2010."

For this surveillance audit AR 27 specified the number of sites (county offices) as 0.6 times the square root of the total number of sites. Thus 6 county offices were visited. The rule specified 2.5 days per office, but up to 20% of audit time was in document review, planning, and reporting. On that basis, and considering field days were expected to be somewhat longer than 8 hours, auditors spent 2 days at each county reviewing MFL properties. Four (4) qualified auditors were deployed so that the 6 selected county offices would all be audited during the same week.

Norman Boatwright, the Co-Lead Auditor, reviewed the central administration on Friday May 25 after auditing his two counties. All auditors conducted their county audits Monday through Thursday, and transmitted their findings to the lead in time for a Friday afternoon exit briefing.

Mike Ferrucci, the other Co-Lead Auditor, worked with Kathryn Nelson, DNR Group Manager, o plan the audits and develop the audit sample. When selecting properties to audit the lead auditor factored in harvesting schedules and sampled a mixture of land owners who were in the process of conducting a harvest or have harvested within the past year as well as landowners who had not harvested within the past year. In addition the following criteria were reflected in the final audit sample:

| Risk            | Sites that pose higher environmental risk to water, soil and wildlife resources;     |
|-----------------|--|
| Range           | Sites that represent forest management practices across the ownership;               |
| Richness        | Sites that allow for concurrent auditing of different ATFS Performance Measures;     |
| Location        | Sites that cover an appropriate range of administrative units;                       |
| Active harvests | Sites that are currently being harvested or have been recently; and                  |
| Special feature | s Sites containing T&E species, special management areas, and visual considerations. |

### Selection of Tree Farms for Site Visits:

- 1.  $\square$  Ferrucci selects 1 county in each region randomly, 1 more nearby
- 2. WDNR provides spreadsheet of TF sites with activity in selected counties
- 3. Ferrucci randomly selects 1 TF for each morning and each afternoon (attached)
- 4. WDNR to make additional selections (total 6 per field day) near random selection
- 5. X WDNR provides updated table with number of Tree Farms in each county
- 6.  $\square$  WDNR to develop schedules and field routes/timing

For each county four Tree Farms were selected, with some alternates in case there are issues with the primary selections. These initial selections (primary and alternate) were Tree Farms with records of recent harvests. These four selections represented the core parcels for "tours" of three field audits to be conducted in a morning, or in an afternoon. Two more TFs were added to each core parcel to total three per tour. Auditors sought to visit at least 12 TFs for each county.

DNR was asked to verify the core Tree Farm selections first, thus developing a framework for the two-days of audits for each county. Once this was done DNR was asked to pick the remaining two TFs associated with the random selections (to total 3 tracts for each half-day of field auditing) based mostly on proximity to random selections. The completed selections were to meet the size distribution requirements, derived from 2011 data which is expected to remain sufficiently accurate:

| Size Category | # TFs         | Ratio  | Percentage     | # of   |
|---------------|---------------|--------|----------------|--------|
| Size category | π 11 <b>3</b> | Natio  | rereentage     | sample |
| Up to 100 ac. | 30535         | 0.8615 | 83-86 <b>%</b> | 30+-   |
| 101-500 ac.   | 4784          | 0.1350 | 12-15%         | 5+-    |
| 501-1000 ac.  | 95            | 0.0027 | 1%             | 1+-    |

Based on the large numbers of Tree Farms involved DNR was close to the required ranges without much effort (based on probabilities). Auditors suggestions were to start by selecting at least one Tree Farm that was 101-500 acres, and one tree farm that was from 501 to 1000 acres.

Factors to emphasize in selecting the additional Tree Farms (in order of importance)

- 1. Adjacency to core selections
- 2. Tree Farm owner known to or likely to be available on site during the visit
- 3. Recent management activity
- 4. Other factors from the criteria provided above (risk, range, risk, location, special features)

Each county would ultimately develop four half-day "tours" for a total of 12 selections per county. Auditors requested to have 1 or 2 backups for each county also; backups could be owners known well to the foresters (perhaps someone who is flexible regarding the visit to their property).

Exception for Shawano County: Selections made by Beth Jacqmain were sufficient for the Tree Farm audits in that county (she had selected 14).

### **Documentation Requested**

Background material on the MFL and on the "Certified Plan Writer Program" was provided in 2011. DNR was asked to update this information if there have been any changes.

On the first day in each county each auditor was provided the following for the selected sites:

- Daily agendas including starting time and location
- List of Tree Farms selected (Note: The names of landowners and foresters we are expected to meet would be helpful but not critical to have in advance.)
- Management plans for the selected tracts
- Example timber harvest contracts (not required for all selections; a sample could be provided when meeting with owners)
- Copies of the most recent inspection forms for the selected tracts

### **Report & Certificate Timeline:**

The lead auditor will provided the Draft Final and Public Summary reports within 2 weeks of the closing meeting for a review of factual accuracy. DNR would submit any comments to the lead auditor within two weeks of the date the draft report is provided. If more time is needed then the total time for reporting will be adjusted. Within one week of receiving any comments from the group representative, the lead auditor made any necessary changes and sent on for NSF-ISR CB review. CB review would be completed within one week. If needed a revised certificate would be issued within 4 weeks of receiving all necessary reports.

### Final & Summary Report Content:

| Final | Report  | Public | e Summary Report   |
|-------|---|--------|--|
| 1.1   | The certification audit scope and objectives;   | 1.1    | The Public Report contents shall include, at a minimum:                              |
| 1.2   | A general description of the group's operations and overall membership;   | 1.2    | A description of the audit process, objectives, and scope;                           |
| 1.3   | A description of the audit process used, including time period;   | 1.3    | The name of group that was audited,  |
| 1.4   | Identification of the group manager and audit team personnel (later are normally listed in audit plan);   |        | including its ATFS representative;   |
| 1.5   | Audit findings and conclusions, including a general description of<br>any nonconformances and corrective action plans to address  | 1.4    | A general description of the group's operations<br>and overall membership;           |
|       | them, opportunities for improvement, and exceptional practices;   | 1.5    | The name of the audit firm and lead auditor;   |
| 1.6   | A schedule for surveillance and recertification audits;   | 1.6    | The dates the certification was conducted and completed;                             |
| 1.7   | The distribution and confidential nature of the Final Report; and   | 1.7    |  |
| 1.8   | Appendices as follows;  | 1.7    | A summary of the findings, including general descriptions of any nonconformances and |
| 1.8.1 | Audit Plan;   |        | corrective action plans to address them,<br>opportunities for improvement, and       |
| 1.8.2 | ATFS Certification Checklists;  |        | exceptional practices; and   |
| 1.8.3 | NSF-ISR Corrective Action Request (CAR) form(s), including<br>corrective action plans developed by the group's representative<br>(which may be contained on additional pages). Note: This<br>section should include documentation of all CARs, even those<br>that were closed prior to the Certification Audit; and Reporting | 1.8    | The certification recommendation.  |
| L     | form for ATFS Certification.  |        |  |

### Confidentiality and non-disclosure:

Evidence and information collected by the audit team will remain confidential and discussed only with the Group manager or NSF-ISR. Unless stated below and discussed with Group manager and NSF-ISR Forestry Program Manager, no member of the audit team have provided any consulting, appraisal services, brokerage services, or advice within the past two years.

### **Dispute Resolution Process:**

In the event that there is a dispute between the lead auditor and the group's representative over any issues involved in the certification audit, the first step is for the group's management representative to call the Audit Manager (888-NSF-9000) to resolve the dispute.

- If the dispute continues, the dispute resolution processes of NSF-ISR will be followed (Dispute Resolution Process in NSF-ISR Policies for Management Systems Registration AESOP 4876).
- Disputes or appeals between an external party and a group's representative are governed by the provisions of "P&P-09 ATFS: National Interpretation And Dispute Resolution, American Tree Farm System" which states
  - "The National Standards Interpretation Committee (NSIC) is a committee subordinate and reporting to the Center for Family Forests Operating Committee (CFF COC) (see P&P-03, Governance). The NSIC role is to provide appropriate interpretations of the American Forest Foundation (AFF) Standards of Sustainability. It will also serve in an advisory role in handling disputes between an IMG Organization and Certification Bodies related to interpretations of the AFF Standards and SOP-01."

### Summary of NSF Auditors' Background and Qualifications

### Co-Team Leader Mike Ferrucci (Northford, CT)

Mike Ferrucci is the SFI Program Manager for NSF – International Strategic Registrations and is responsible for all aspects of the firm's SFI Certification programs. He is qualified as a Lead Auditor to conduct Chain of Custody, Procurement System or Sustainable Forest Management audits under the Sustainable Forestry Initiative Standard® (SFI), the Forest Stewardship Program (FSC), and the Tree Farm Group Certification programs. Mike is also credentialed as a Lead Auditor under RAB-QSA (ISO 14001 Environmental Management Systems).

Mike meets all of the requirements as a Tree Farm Group Certification Lead Auditor, and has participated in several Tree Farm Group audits including the original scoping audit for the Wisconsin MFL program. Mike developed the NSF procedures for ATFS audits. Over the past ten years he has conducted Sustainable Forest Initiative (SFI) certification and precertification reviews on lands throughout the United States. He has also led or participated in joint SFI and Forest Stewardship Council (FSC) certification projects in Minnesota, Wisconsin, Michigan, Maryland, Maine, and Connecticut and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He also co-led the pioneering pilot dual evaluation of the Lakeview Stewardship Unit on the Fremont-Winema National Forest. He is qualified as a RAB EMS Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor, as an FSC Team Leader.

Mike has also led Chain of Custody audits for all segments of the forest products industry, including corrugated and box producers, integrated paper companies, paper distributors, solid wood mills, engineered wood products facilities, brokers, and distributors. In audits with pulp mills, corrugated producers, and box plants Mike has addressed the issues involving recycled content.

Mike Ferrucci has 31 years of forest industry experience. His expertise is in forest certification, in sustainable forest management planning; in certification of forests as sustainably managed; in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis on regeneration and management of native hardwood species. He has also developed expertise in the conservation of forest biodiversity at multiple spatial scales through his involvement in the founding and administration of The Conservation Forestry Network and through his work with the Northern Forest Protection Fund.

### Co-Team Leader Norman Boatwright, ATFS & SFI Lead Auditor (Columbia, SC)

Norman Boatwright currently manages the Environmental Services Division of Milliken Forestry Services that handles Phase I Environmental Site Assessments, Forest Soil Mapping, Wetland Delineation, and other Biological Services. He has over fifteen years' experience in intensive forest management and ten years' experience in environmental services. He has conducted Phase I Assessments on over one hundred and fifty projects covering 967,000 acres, ESA and Endangered Species Assessment on timberland across the South, and managed soil mapping projects over 1.3 million acres. From 1985-1999, he was Division Manager at Canal Forest Resources, Inc. and was responsible for all forest management activities on about 90,000 acres of timberland in eastern South Carolina. Duties included budgeting and implementing land and timber sales, site preparation, planting, best management practices, road construction, etc. Norman is a Qualified Lead Auditor under the ATFS Program with extensive experience auditing procurement and land management organizations. He has experience with ATFS Group Certification, both as the field auditor for the West Virginia audits under the main Tree Farm Program and as an owner of Milliken Forestry which as a certified IMG.

### Audit Team Members (total 4 including Co-Lead Auditors)

### Tucker Watts, ATFS, SFI, FSC Forestry and Chain of Custody Lead Auditor (Mississippi)

Tucker Watts has over 30 years' experience in forest management, primarily in the southern U.S. He worked for many years for International Paper Company, first as a land management and procurement forester, then as an analyst, and finally as an environmental manager with considerable involvement in forest certification. Tucker has a BS in Forestry from Louisiana Tech, and MS in Forestry from Mississippi State University, and an MBA from Centenary College. He has participated in many forestry organizations, notably as a Trainer in the Louisiana Master Logger Program, as a team member for "Recommended Forestry Best Management Practices for Louisiana" and on various SFI State Implementation Committees. Tucker is trained as a Tree Farm Group Certification Auditor and has experience in SFI and FSC auditing from both sides, as an auditor and as the

management representative of an organization being audited. Audit experience includes audits of pulp and paper mills, container and box companies, printers, distributers, and audits of recovered fiber and recycled content.

### Proposed Report Reviewer: Jerry Grossman, ATFS and SFI Lead Auditor (Michigan)

Gerald Grossman, ACF & CF, is a SFI and a Tree Farm Group Certification Lead Auditor for NSF – International Strategic Registrations. Gerald has led or participated in over 40 Sustainable Forest Initiative (SFI) certifications throughout the Eastern United States. Gerald has a B.S. in Forestry from the University of Michigan and a M.S in Forestry & M.B.A. from Michigan State University. He has been President of Grossman Forestry Company, a full service consulting forestry firm located in the Eastern Upper Peninsula of Michigan, since 1990. The Grossman Forestry Company employees 7 full time foresters and manages over 260,000 acres of timberland for a wide variety of landowners.

Gerald is a member of numerous forestry and conservation organizations, and has served in leadership positions in many including the Michigan Society of American Foresters. He has received numerous awards in recognition of his professional and volunteer accomplishments.

| County      | Municipality | Order<br>Number | Primary Landowner Name               | Town-<br>ship | Ran-<br>ge | Sect-<br>ion |
|-------------|--------------|-----------------|--------------------------------------|---------------|------------|--------------|
| ASHLAND     | CHIPPEWA     | 02-006-2008     | MAX BRUCH JR                         | 41            | 02W        | 29           |
| ASHLAND     | PEEKSVILLE   | 02-011-2003     | SCOTT MAIER                          | 42            | 01W        | 08           |
| ASHLAND     | PEEKSVILLE   | 02-011-2003     | SCOTT MAIER                          | 42            | 01W        | 08           |
| ASHLAND     | AGENDA       | 02-005-2006     | CONRAD BARTH                         | 42            | 01E        | 03           |
| Ash - alt   | AGENDA       | 02-017-2007     | JOHN BESSE                           | 42            | 01E        | 33           |
| IRON        | ANDERSON     | 26-002-1994     | BRIAN MAXINOSKI                      | 44            | 01W        | 19           |
| IRON        | KNIGHT       | 26-004-1993     | LAKE O'BRIEN INC                     | 44            | 01E        | 08           |
| IRON        | SHERMAN      | 26-043-2007     | WILLIAM SCHULTZ                      | 41            | 03E        | 24           |
| IRON        | ANDERSON     | 26-017-2005     | GREG BUCHEGER                        | 44            | 01W        | 28           |
| IRON alt    | SHERMAN      | 26-044-2007     | WILLIAM W/MARY ANN SCHULTZ<br>REV TR | 41            | 03E        | 24           |
| RUSK        | MURRY        | 55-030-2008     | SWANKE TIMBERLAND LTD<br>PARTNERSHIP | 36            | 08W        | 23           |
| RUSK        | MURRY        | 55-030-2008     | SWANKE TIMBERLAND LTD<br>PARTNERSHIP | 36            | 08W        | 23           |
| RUSK        | RUSK         | 55-008-1994     | PETER BREED                          | 33            | 09W        | 18           |
| RUSK        | RUSK         | 55-008-1994     | PETER BREED                          | 33            | 09W        | 18           |
| RUSK        | MURRY        | 55-012-1989     | SWANKE TIMBERLAND LTD<br>PARTNERSHIP | 36            | 08W        | 25           |
| RUSK        | RUSK         | 55-249-2000     | DANIEL DOUGHTY                       | 33            | 09W        | 02           |
| SAWYER      | WINTER       | 58-059-2004     | JEFF DIETZ                           | 39            | 05W        | 03           |
| SAWYER      | WINTER       | 58-201-2010     | CHARLES BOLLIG                       | 37            | 05W        | 34           |
| SAWYER      | HAYWARD      | 58-015-2001     | JAMES & KATIE PURDIN REV<br>TRUST    | 41            | 08W        | 14           |
| SAWYER      | METEOR       | 58-004-1996     | GARGULAK REVOCABLE TRUST             | 37            | 08W        | 16           |
| Saw-alt     | DRAPER       | 58-255-1999     | THOMAS STEINER                       | 39            | 04W        | 22           |
| SHAWANO     | SENECA       | 59-017-2008     | JOSEPH ASENBRENNER                   | 27            | 13E        | 29           |
| SHAWANO     | HUTCHINS     | 59-122-2002     | GEORGE SCHMIDT                       | 29            | 12E        | 01           |
| SHAWANO     | GERMANIA     | 59-019-1993     | MICHAEL TRYBA                        | 26            | 11E        | 31           |
| SHAWANO     | ANIWA        | 59-006-1992     | PAUL VOLKMANN                        | 29            | 11E        | 02           |
| Shawano-alt | GRANT        | 59-027-2009     | RYAN BREITENFELDT                    | 26            | 13E        | 06           |
| WAUPACA     | CALEDONIA    | 69-004-1991     | ANGELINE KAMBA                       | 21            | 14E        | 06           |
| WAUPACA     | CALEDONIA    | 69-041-1998     | FOX VALLEY MUZZLELOADERS             | 21            | 14E        | 04           |
| WAUPACA     | MUKWA        | 69-001-2009     | ERIC COOK                            | 22            | 14E        | 11           |
| WAUPACA     | ROYALTON     | 69-068-1993     | MERLIN BECKER                        | 22            | 13E        | 18           |
| WAUP. alt   | HELVETIA     | 69-046-1997     | KMHT SUBTRUST                        | 24            | 12E        | 02           |

**Appendix II** 



# WI Managed Forest Law Tree Farm Group Summary Surveillance Audit Report

The ATFS Program of the Wisconsin Managed Forest Law Tree Farm Group has achieved continuing conformance with the AFF 2010-2015 Standards of Sustainability for Forest Certification of Private Lands, according to the NSF-ISR ATFS Certification Audit Process.

The Wisconsin Managed Forest Law Tree Farm Group was initially certified in 2005. The Wisconsin Department of Natural Resources manages a Group Certification program for non-industrial forestland enrolled in the Managed Forest Law (MFL). MFL Group Certification focuses on DNR's administration of the group and quality of management on member land. There are approximately 36,057 tree farms included in this certification that total approximately 2,441,260 acres (January 2012). These tree farms are scattered across the state.

The audit was performed by NSF-ISR on May 21- June 1, 2012 by an audit team headed by Mike Ferrucci and Norman Boatwright, Co-Lead Auditors and Tucker Watts – Team Auditor. Audit team members fulfill the qualification criteria for conducting ATFS Certification Audits contained in the AFF requirements. The objective of the audit was to assess conformance to the requirements of the American Tree Farm Program.

The scope of the ATFS Audit included the enrolled Wisconsin Managed Forest Law Program members that elected to take part in the certification. Forest practices that were the focus of field inspections included those that have been under active management over the planning period of the past 5 years. In addition, practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example). The management obligations of the group were also reviewed.

Some of the ATFS requirements were outside of the scope of Wisconsin Managed Forest Law Tree Farm Group's ATFS program and were excluded from the scope of the ATFS Certification Audit as follows:

• Performance Measure 4.3 - When used, prescribed fire must conform to forest owner's objectives, the forest management plan and pre-fire planning. Prescribed fire is not generally used in central and northern hardwood management.

No indicators were modified.

# **ATFS Audit Process**

NSF-ISR initiated the ATFS surveillance audit process with a phone call to confirm the scope of the audit and schedule the audit.

The actual NSF-ISR ATFS Surveillance Audit was governed by a detailed Audit Plan designed to enable the audit team to determine conformance with the applicable ATFS requirements. The plan included detailed provisions for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

During the audit NSF-ISR reviewed a sample of the written documentation assembled to provide objective evidence of ATFS Conformance. NSF-ISR also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF-ISR ATFS-SOP. NSF-ISR also selected and interviewed stakeholders such as contract loggers, landowners and other interested parties, and interviewed employees within the organization to confirm that the ATFS Standard was understood and actively implemented.

The possible findings of the audit included Full Conformance, Major Non-conformance, Minor Non-conformance, and Opportunities for Improvement.

## **Overview of Audit Findings**

Wisconsin Managed Forest Law Tree Farm Group's ATFS Program was found to be in full conformance with the ATFS Standard. The NSF-ISR ATFS Surveillance Audit Process determined there is a minor non-conformance that is described herein:

**4.1.1** Forest owner must implement specific BMPs that are applicable to the property. The site visit identified a BMP/Water Quality issue. A logging road was constructed that crossed an intermittent stream and curved upslope for several hundred yards. The crossing was properly constructed but water diversions were not placed on the upslope section of the road. The entire road was stabilized with appropriate vegetation but rainwater runoff had eroded a ditch along the south side of the road that resulted in sediment being deposited into the intermittent stream. The DNR Forester documented that he contacted the landowner several times since the completion of harvest. However, the harvest was completed 17 months ago and the issue is not yet resolved.

Wisconsin Managed Forest Law Tree Farm Group will develop a corrective action plan to address this issue. Progress in implementing this corrective action plan will be reviewed in subsequent surveillance audits.

An opportunity for improvement were also identified, and included:

# **3.1.1** There is an opportunity to improve the regeneration of forest stands in selection harvests, including numerical targets for regeneration in northern hardwood types.

These findings do not indicate a current deficiency, but served to alert WIDNR to areas that could be strengthened or which could merit future attention.

**For addition information contact:** Mike Ferrucci, NSF Forestry Program Manager Office and Mobile: 203-887-9248 mferrucci@iforest.com

Kathy Nelson (608) 266-3545 kathryn.nelson@wisconsin.gov

END OF SUMMARY REPORT

# Appendix III



# Audit Matrix & Group Checklist

# AFF STANDARDS (2010 – 2015) MONITORING CHECKLIST

### Group Organization's Name: Wisconsin DNR Managed Forest Law Program Group Member's Tree Farm Name: Rusk County, Sawyer County, Ashland County, Iron County, Shawano County, and Waupaca County Auditors: Norman Boatwright – Lead, Tucker Watts and Mike Ferrucci - Team Audit Dates: May 21-24, 2012 for Tucker and Mike and May 28 – June 1, 2012 for Norman

This document is provided as a tool to IMGs to record and document objective evidence and findings for each AFF Standards Core Performance Measure and Primary Indicator. A narrative description of the objective evidence should be provided indicating what documents were reviewed, personnel interviewed, or field sites inspected. A check Mark (X) should be placed in the correct column indicating Conformance (Conform), Major Non-conformance (Major), Minor Non-conformance (Minor), and Opportunity for Improvement (OFI). Where a major or minor non-conformance is found, the internal auditor should fully document the rationale for the non-conformance on a Corrective Action Request (CAR) form (GO-06). Indicate (N/A) if the Core Performance Measure and/or Primary Indicators is not applicable under Objective Evidence. (Note that conformance is measured to the Core Performance Measures and Primary Indicators. Performance Measures and Indicators with the term <u>Must</u> are considered Core and Primary, respectively).

| AFF Standards Requirements                                     | Briefly Described the Objective Evidence of<br>Conformance (Documents Reviewed,<br>Personnel Interviewed, Sites Visited) | Conform | Major | Minor | OFI |
|--|--|---------|-------|-------|-----|
| Standard 1: Commitment to Practicing Sustainable               |  |         |       |       |     |
| Forestry   |  |         |       |       |     |
| Forest owner demonstrates commitment to forest vitality by     |  |         |       |       |     |
| developing and implementing a sustainable forest management    |  |         |       |       |     |
| plan.  |  |         |       |       |     |
| Performance Measure 1.1  | All properties audited had written plans that were   | 12      |       |       |     |
| Forest owner must have and implement a written forest          | consistent with forest size and objectives.  |         |       |       |     |
| management plan consistent with the size of the forest and the |  |         |       |       | 1   |
| scale and intensity of the forest activities.                  |  |         |       |       |     |

| AFF Standards Requirements  | Briefly Described the Objective Evidence of<br>Conformance (Documents Reviewed,<br>Personnel Interviewed, Sites Visited)   | Conform | Major | Minor | OFI |
|---|--|---------|-------|-------|-----|
| Indicator 1.1.1<br>Management plan must be active, adaptive, and embody the<br>landowner's current objectives, remain appropriate for the land<br>certified, and reflect the current state of knowledge about<br>forestry and natural resource management.  | Plans are updated at the time a harvest or practice<br>is implemented, at the end of the order period,<br>or at other times as needed when determined by<br>WDNR Foresters. WisFIRS System will be<br>implemented this summer for the development of<br>Management Plans. The WisFIRS System will<br>automatically update Management Plans<br>following an activity. A GIS module is being<br>tested on public lands. This should be available<br>for private lands in 2 years. A module for the<br>automatic development of the Cutting Notice and<br>generation of bill following cutting is being<br>developed. | 12      |       |       |     |
| Indicator 1.1.2<br>Management plans must: clearly state landowner's objectives,<br>describe desired forest condition, include management<br>activities aimed at reaching the desired forest condition and<br>landowner's objectives, document a feasible strategy for<br>activity implementation, and include a tract map accurately<br>depicting significant forest related resources. | All plans clearly state objectives, describe stand<br>conditions and prescriptions for achieving<br>implied desired conditions, include and include<br>lists of actions and maps. The strategy for<br>implementation is clear in the recently-written<br>plans but not the older ones.   | 12      |       |       |     |
| Where present, and relevant to the property, the plan must<br>address the following resource elements: forest health, soil,<br>water, wood and fiber production, threatened and endangered<br>species, special sites, invasive species, integrated pest<br>management, and high conservation value forests.   |  |         |       |       |     |
| Where present, relevant to the property, and consistent with<br>landowner's objectives, the plan preparer may consider,<br>describe and evaluate the following resource elements: fire,<br>wetlands, desired species (fish, wildlife and plant), recreation,<br>aesthetic quality, biomass and carbon.  |  |         |       |       |     |

| AFF Standards Requirements   | Briefly Described the Objective Evidence of<br>Conformance (Documents Reviewed,<br>Personnel Interviewed, Sites Visited)   | Conform | Major | Minor | OFI |
|--|--|---------|-------|-------|-----|
| Indicator 1.1.3*<br>Forest owner should monitor for changes that could interfere<br>with the management objectives as stated in management plan<br>(e.g., presence of invasive species, pest outbreaks, and<br>indications of trespass). When problems are found, reasonable<br>actions are taken. | Owners, supported by consulting foresters and by<br>WDNR foresters, are generally quite involved<br>with their lands. Several examples of actions<br>taken to deal with changed conditions were<br>observed.   | 12      |       |       |     |
| <b>Standard 2: Compliance With Laws</b><br>Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.  |  |         |       |       |     |
| Performance Measure 2.1<br>Forest owner must comply with all relevant federal, state,<br>county, and municipal laws, regulations, and ordinances.  | No evidence of non-compliance with laws.   | 12      |       |       |     |
| Indicator 2.1.1<br>Forest owner must comply with all relevant laws, regulations<br>and ordinances and will correct conditions that led to adverse<br>regulatory actions, if any.   | Foresters are involved in planning all harvests<br>and major silvicultural treatments; these foresters<br>help owners comply.  | 12      |       |       |     |
| Indicator 2.1.2<br>Forest owner should obtain advice from appropriate<br>professionals, or contractors who are trained in, and familiar<br>with, relevant laws, regulations and ordinances.  | All owners are working with Wisconsin DNR<br>foresters, and many are working with private<br>consulting foresters as well. Many of the loggers<br>are FISTA (SFI) trained. Many consulting<br>foresters are becoming certified to DNR's<br>Cooperative Forester Program. Requirements are<br>defined by DNR. CEU are required to maintain<br>certification. Some CEUs are provided by DNR. | 12      |       |       |     |
| <b>Standard 3: Reforestation and Afforestation</b><br>Forest owner completes timely restocking of desired species of<br>trees on harvested sites and non-stocked areas where tree<br>growing is consistent with land use practices and the forest<br>owner's management objectives.                |  |         |       |       |     |

| AFF Standards Requirements   | Briefly Described the Objective Evidence of<br>Conformance (Documents Reviewed,<br>Personnel Interviewed, Sites Visited)   | Conform | Major | Minor | OFI |
|--|--|---------|-------|-------|-----|
| Performance Measure 3.1<br>Reforestation or afforestation must be achieved by a suitable<br>process that ensures adequate stocking levels. | Timely reforestation and afforestation is assured<br>by WDNR MFL provisions, with the exception<br>of areas with very high deer populations. This<br>appears to be an emerging problem, particularly<br>given recent changes to deer management<br>policies and laws. Trends in deer populations<br>and changes in deer population<br>management may impact forest sustainability.<br>Northern hardwood stands managed using<br>selection silviculture are particularly susceptible<br>to regeneration delays or failure when deer<br>populations are high. Thus far the stocking<br>levels in the majority of stands are within the<br>standards prescribed in the silvicultural<br>guidelines, but this issue should be carefully<br>monitored in future audits. | 12      |       |       |     |

| AFF Standards Requirements   | Briefly Described the Objective Evidence of<br>Conformance (Documents Reviewed,<br>Personnel Interviewed, Sites Visited)   | Conform | Major | Minor | OFI     |      |
|--|--|---------|-------|-------|---------|------|
| Indicator 3.1.1<br>Harvested forest land must achieve adequate stocking of<br>desired species reflecting the forest owner's management<br>objectives, within five years after harvest, or within a time<br>interval as specified by applicable regulation. | The MFL program tracks all regeneration<br>harvests. Foresters may schedule a<br>"mandatory practice" inspection five years<br>after such harvests to ensure adequate<br>stocking is achieved. There is an<br>opportunity to improve the regeneration<br>of forest stands in selection harvests,<br>including numerical targets for<br>regeneration in northern hardwood types.  |         |       |       | 12      |      |
|  | Natural regeneration is visually monitored by<br>foresters when assessing each ownership. The<br>MFL program has the capability to track<br>regeneration harvests and schedule a "mandatory<br>practice" inspection five years after such harvests<br>in even-aged types to ensure adequate stocking is<br>achieved. When natural regeneration may not<br>provide adequate stocking (high risk sites), the<br>ownership is identified in the database for a<br>surveillance visit to monitor regeneration. This<br>was identified and discussed for several<br>situations during the site visits. For selection<br>silviculture routine selection entries (note that <b>all</b><br>selection entries are expected to provide<br>regeneration) do not trigger a regeneration check. |         |       |       |         |      |
|  | Under normal conditions natural regeneration<br>provides adequate stocking, but several Tree<br>Farms audited in Shawano County had little or no<br>natural regeneration following selection harvests,<br>and were unlikely to regenerate given high deer<br>populations and levels of deer browsing pressure,<br>as well as the development of interfering<br>vegetation such as grasses and ferns. For<br>example, at one property (Order # 59-008-2008)<br>there were no tree seedlings (regeneration) where<br>they should be expected, and clear, widespread<br>signs of long-term over-browsing by deer,<br>including reduced understory, abundance of ferns<br>and forbs.   |         |       |       | Page 18 | i of |

| AFF Standards Requirements  | Briefly Described the Objective Evidence of<br>Conformance (Documents Reviewed,<br>Personnel Interviewed, Sites Visited)   | Conform | Major | Minor | OFI |
|---|--|---------|-------|-------|-----|
| <b>Standard 4: Air, Water and Soil Protection</b><br>Forest management practices maintain or enhance the<br>environment and ecosystems, including air, water, soiland soil<br>and site quality. |  |         |       |       |     |
| Performance Measure 4.1<br>Forest owner must meet or exceed practices prescribed by State<br>Forestry Best Management Practices (BMPs) that are<br>applicable to the property.                  | Reasonable BMP compliance was observed on<br>the majority of forests inspected. Some harvest<br>(yarding) roads and trails located on moderate<br>slopes were observed to have fewer waterbars or<br>less surface stabilization measures than<br>recommended in the Wisconsin BMP guidelines,<br>but in most cases the sites were stabilizing<br>without such measures.<br>Road construction appeared to be reasonable and<br>not excessive. | 12      |       |       |     |

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|--|--|---------|-------|-------|-----|
| Indicator 4.1.1<br>Forest owner must implement specific BMPs that are<br>applicable to the property. | Reasonable BMP compliance was observed on<br>the majority of forests inspected. Some harvest<br>(yarding) roads and trails located on moderate<br>slopes were observed to have fewer waterbars or<br>less surface stabilization measures than<br>recommended in the Wisconsin BMP guidelines,<br>but in most cases the sites were stabilizing<br>without such measures.  |         |       | 12    |     |
|  | Minor non-conformance:   |         |       |       |     |
|  | The site visit to the Gargulak Revocable Trust<br>tree farm identified a BMP/Water Quality<br>issue. A logging road was constructed that<br>crossed an intermittent stream and curved<br>upslope for several hundred yards. The<br>crossing was properly constructed but water<br>diversions were not placed on the upslope<br>section of the road. The entire road was<br>stabilized with appropriate vegetation but<br>rainwater runoff had eroded a ditch along the<br>south side of the road that resulted in<br>sediment being deposited into the intermittent<br>stream. |         |       |       |     |
|  | The DNR Forester documented that he<br>contacted the landowner several times since<br>the completion of harvest. However, the<br>harvest was completed 17 months ago and the<br>issue is not yet resolved.   |         |       |       |     |

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|---|---|---------|-------|-------|-----|
| Indicator 4.1.2<br>Forest owner must minimize road construction and other<br>disturbances within riparian zones and wetlands.                                   | Properties inspected had well-designed and<br>maintained roads (often mowed) that respected<br>(minimized impacts in) riparian zones. Roads on<br>some properties were seeded to control soil<br>movement. Culverts were stabilized using rip<br>rap, silt fences, and seeding.   | 12      |       |       |     |
| Performance Measure 4.2<br>Forest owner must consider integrated pest management to<br>control pests, pathogens and unwanted vegetation.                        | Foresters encourage proper stocking. Efforts are made to deal with invasive plants, but more could be done.   | 12      |       |       |     |
| Indicator 4.2.1<br>Forest owner should evaluate alternatives to manage pest,<br>pathogens and unwanted vegetation to achieve specific<br>management objectives. | Interviews showed that most forest owners use<br>chemical measures only if there is no effective<br>alternative.  | 12      |       |       |     |
| Indicator 4.2.2<br>Pesticides used must be EPA-approved.  | Interviews confirmed that chemicals are applied<br>as per label. Site inspections included a visit to<br>the David Reda Living Trust tree farm where<br>bush honeysuckle was treated and the area<br>planted with red pine and white spruce.<br>Herbicides used were Garlon 4 and Accord HT<br>which are EPA approved and a file review<br>indicated they were applied by a licensed<br>contractor. | 12      |       |       |     |
|   | Site visit to the Becker tree farm indicates they<br>were starting to use herbicides for invasive<br>species, using only EPA-registered chemicals and<br>per label instructions.  |         |       |       |     |

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|---|--|---------|-------|-------|-----|
| Indicator 4.2.3<br>Pesticides must be applied, stored and disposed of in<br>accordance with EPA-approved labels and by persons<br>appropriately trained, licensed and supervised.   | Interviews confirmed that chemicals are applied<br>as per label. Site inspections included a visit to<br>the David Reda Living Trust tree farm where<br>bush honeysuckle was treated and the area<br>planted with red pine and white spruce.<br>Herbicides used were Garlon 4 and Accord HT<br>which are EPA approved and a file review<br>indicated they were applied by a licensed<br>contractor. Most pesticide use is by the owners,<br>who are applying over-the-counter chemicals<br>(glyphosate primarily). | 12      |       |       |     |
| Performance Measure 4.3<br>When used, prescribed fire must conform with/to forest owner's objectives, the forest management plan and pre-fire planning.   | N.A.   |         |       |       |     |
| Indicator 4.3.1<br>Prescribed fire must conform with/to the management plan and<br>state and local laws and regulations.  | N.A.   |         |       |       |     |
| <b>Standard 5: Fish, Wildlife and Biodiversity</b><br>Forest management activities contribute to the conservation of biodiversity.  |  |         |       |       |     |
| Performance Measure 5.1<br>Forest management activities must maintain or enhance habitat<br>for threatened or endangered communities and species.   | Management provides a variety of habitat; Bald<br>Eagle was found during Spring on Matula<br>property. See notes below.  | 12      |       |       |     |
| Indicator 5.1.1<br>Forest owner must confer with natural resource agencies, state<br>natural resource heritage programs or review other sources of<br>information to determine occurrences of threatened and<br>endangered species on the property and their habitat<br>requirements. | Cutting Notice and Report of Wood Products<br>from Forest Crop and Managed Forest Lands<br>requires a check of the Wisconsin NHI<br>database.  |         |       |       |     |

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|--|---|---------|-------|-------|-----|
| Indicator 5.1.2<br>Forest management activities must incorporate measures to<br>protect identified threatened and endangered species.  | Bald Eagle was found during Spring on<br>Matula property. Management guidelines have<br>been followed. Goshawk can also be found in<br>this area. Guidelines are followed. Wildlife<br>biologist are biologists are consulted when T&E<br>species are identified.<br>59-122-2002 Schmidt property had a Natural<br>Heritage Inventory "hit" for red-shouldered<br>hawk; the specialist's recommendation for<br>retention of some larger trees and a structurally<br>diverse stond is being met here | 12      |       |       |     |
| Performance Measure 5.2<br>Forest owner should address the desired species (fish, aquatic,<br>wildlife, and plant) and/or desired forest communities in the<br>management plan and forest management activities.                                     | Owner's wildlife objectives were general in<br>nature, although often included deer and turkey<br>(a generalist). Management was consistent with<br>providing a variety of habitat. Grouse, turkey<br>and bear were also included.  | 12      |       |       |     |
| Indicator 5.2.1<br>Forest owner should consult available and accessible<br>information on management of the forest for desired species<br>(fish, aquatic, wildlife, and plant) and/or forest communities<br>and integrate it into forest management. | Foresters involved in all plans and all harvests;<br>information on management for desired species is<br>provided through these foresters; occasionally<br>supplemented by specialist information.<br>Cooperating Forester Program involves CEU for<br>these topics.  | 12      |       |       |     |
| Performance Measure 5.3<br>Forest owner should make practical efforts to prevent, eradicate<br>or otherwise control invasive species.  | Some owners make substantial efforts; others could do more.   | 12      |       |       |     |
| Indicator 5.3.1<br>Forest owner should make practical efforts to prevent, eradicate<br>or otherwise control invasive species using a range of<br>integrated pest management methods.   | Some owners make substantial efforts; others could do more.   | 12      |       |       |     |
| Performance Measure 5.4<br>Forest management activities should maintain or enhance rare<br>species and high conservation value forests.  | No such forests were present on the 24 sites.   | 12      |       |       |     |

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|---|--|---------|-------|-------|-----|
| Indicator 5.4.1<br>Appropriate to the scale and intensity of the situation, forest<br>management activities should incorporate measures to protect<br>or mitigate impacts on rare species and identified high<br>conservation value forests.        | No such rare species or hcv high conservation value forests were present on the 24 sites.  | 12      |       |       |     |
| <b>Standard 6: Forest Aesthetics</b><br>Forest management plans and management activities recognize<br>the value of forest aesthetics.  |  |         |       |       |     |
| Performance Measure 6.1<br>Forest owner should manage the visual impacts of forest<br>management activities consistent with the size of the forest, the<br>scale and intensity of forest management activities and the<br>location of the property. | Harvests and forests observed were managed<br>with concern for visual impacts. Buffer strips<br>along water and roads were witnessed and<br>discussed during site visits.  | 12      |       |       |     |
| Indicator 6.1.1<br>Forest management activities should apply visual quality<br>measures compatible with appropriate silvicultural practices.  | Harvests had good utilization and green retention<br>which helped manage appearance. In all<br>practices the Wisconsin DNR applies visual<br>quality measures to manage visual quality<br>management of silvicultural practices by using<br>irregular stand lines for cutting boundaries, leave<br>trees, and groups of trees in their cutting<br>prescriptions. | 12      |       |       |     |
| <b>Standard 7: Protect Special Sites</b><br>Special sites are managed in ways that recognize their unique<br>historical, archaeological, cultural, geological, biological or<br>ecological characteristics.   |  |         |       |       |     |
| Performance Measure 7.1<br>Forest management activities must maintain special sites.  | Special sites are reviewed during the<br>development of the Cutting Notice. The few<br>special (generally historic) sites present were<br>buffered from management activities.   | 12      |       |       |     |
| Indicator 7.1.1<br>Forest owner must make a reasonable effort to locate and<br>protect special sites appropriate for the size of the forest and<br>the scale and intensity of forest management activities.   | During management planning, particularly for<br>harvests or other mandatory practices, there is a<br>check of heritage and historical/archaeological<br>databases. Development of the Cutting Notice<br>was witnessed during site visits.  | 12      |       |       |     |

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|---|---|---------|-------|-------|-----|
| <b>Standard 8: Forest Product Harvests and Other Activities</b><br>Forest product harvests and other management activities are<br>conducted in accordance with the management plan and<br>consider other forest values. |   |         |       |       |     |
| Performance Measure 8.1<br>Forest owner should use qualified natural resource<br>professionals and qualified contractors when contracting for<br>services.  | All forest owners work with qualified foresters.<br>See below.  | 12      |       |       |     |
| Indicator 8.1.1<br>Forest owner should seek qualified natural resource<br>professionals and qualified contractors.  | All forest owners work with qualified foresters<br>and most of the harvesting is conducted by<br>FISTA-trained (SFI) contractors. Wisconsin<br>DNR has developed a Cooperating Forester<br>Program to assist forest owners. The Wisconsin<br>DNR provides forest owners with lists of<br>qualified natural resource professionals and<br>qualified contractors. This list may be requested<br>or downloaded from their website. | 12      |       |       |     |
| Indicator 8.1.2*<br>Forest owner should engage contractors that carry appropriate<br>insurance and comply with appropriate federal, state and local<br>safety and fair labor rules, regulations and standard practices. | Insurance provisions in logging contract provided<br>by Wisconsin DNR to forest owners.   | 12      |       |       |     |
| Indicator 8.1.3<br>Forest owner should retain appropriate contracts for forest<br>product harvests and other management activities to<br>demonstrate conformance to the AFF Standards.                                  | Contracts in landowner files. A sample contract<br>is provided to forest owners with the letter from<br>Wisconsin DNR for scheduled activity.   | 12      |       |       |     |

| AFF Standards Requirements   | Briefly Described the Objective Evidence of<br>Conformance (Documents Reviewed,<br>Personnel Interviewed, Sites Visited)   | Conform | Major | Minor | OFI |
|--|--|---------|-------|-------|-----|
| Performance Measure 8.2<br>Forest owner must monitor forest product harvests and other<br>management activities to ensure they conform to the<br>management plan objectives.   | Harvests are monitored by consulting foresters<br>and/or by WDNR foresters. The Wisconsin DNR<br>foresters monitor management plans and notify<br>forest owners when planned activities are<br>scheduled. The prescription for the activity<br>must be reviewed and approved by the Wisconsin<br>DNR prior to implementation. During<br>implementation the activity is monitored.<br>Following the completion of the activity the<br>Wisconsin DNR visits the site to evaluate if the<br>implemented activity meets the planned activity.  | 12      |       |       |     |
| Indicator 8.2.1<br>Harvest, utilization, removal and other management activities<br>must be conducted in compliance with the management plan<br>and maintain the potential of the property to produce forest<br>products and other benefits sustainably. | Following the completion of the activity the<br>Wisconsin DNR foresters visit the site to evaluate<br>if the implemented activity meets the planned<br>activity. Observations of utilization confirmed<br>that harvested trees are generally fully utilized.<br>Notes in files for several landowners documented<br>action taken by Wisconsin DNR for delays in<br>scheduled activities. Scheduled<br>activities are monitored closely. Discussions also<br>indicated that properties have been dropped from<br>the program when the activities cause the site to<br>not meet the productivity requirements of the<br>MFL program. WDNR foresters employ several<br>quite effective techniques to assure a very high<br>level of compliance with the program, and<br>members who delay implementing mandatory<br>practices are given additional time and support to<br>enable them to come into compliance if they are<br>willing. | 12      |       |       |     |

# Wisconsin DNR MFL Tree Farm Group, FRS #1Y942

Date of audit: May 21-June 1, 2012

## Section 1. Group Organization Administration

### **1.1 Legal and General Requirements**

a. The Group Organization must be a legal entity competent to sign agreements with Group Members and to enter into binding contracts with Certification Bodies and other outside entities.  $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: The WDNR Division of Forestry is a legal entity created by the state legislature.

b. The Group Organization must identify Group Members' category.

I. The Group Organization *must* document the group member category (see above section on Group Member types).

 $\bigvee$ Yes  $\square$  No  $\square$  N.A. Audit Notes: Group member category is declared in the revised Forest Tax Law Handbook, Chapter 21 p21-2 as Group1. The revision is pending final review. This was a minor non-conformance in 2011.

II. The Group Organization *must* describe roles and responsibilities of the Group Manager and Group Members with respect to forest management decisions and actions with respect to the implementation of the AFF Standards (e.g. plan development, harvesting, monitoring, etc.)

 $\mathbf{V}$  Yes  $\mathbf{N}$  No  $\mathbf{N}$  A. Audit Notes: WDNR oversees all aspects of maintaining group certification. The DNR administration of the program includes the Division of Forestry, the supervisory hierarchy of the DNR regions, the DNR service foresters and technicians, and the cooperating foresters providing private landowner assistance. The Department determines eligibility and membership requirements of the group.

The Division of Forestry Forest Tax Law Program and Policy Chief is designated as the group manager who administers the affairs of the MFL Certified Group. More broadly, the group manager may delegate authority to the WDNR Sustainable Forest Certification Coordinator, other central office staff, regional staff and cooperating foresters.

III. The Group Organization *must* have a written commitment to sustainable forestry and conformance to the AFF Standards.

**Yes No N.A.** Audit Notes: As documented in the *Forest Law Handbook*, DNR is committed to conform to ATFS and FSC principles, criteria and performance measures in the administration of the Managed Forest Law. MFL participants who elect not to depart from the MFL Certified Group also agree to conform to ATFS and FSC standards.

### **1.2 Roles & Responsibilities**

a. The Group Organization must adhere to ATFS eligibility requirements and may further define membership parameters for their Group, if desired.

 $\forall$  Yes  $\Box$  No  $\Box$  N.A. Audit Notes: WDNR has further defined its group membership parameters as follows: It consists of at least 10 contiguous acres, except as provided

in this subdivision. The fact that a lake, river, stream or flowage,

a public or private road or a railroad or utility right–of–way separates any part of the land from any other part does not render a parcel of land noncontiguous. If a part of a parcel of at least 10 contiguous acres is separated from another part of that parcel by

a public road, that part of the parcel may be enrolled in the program, even if that part is less than 10 acres, if that part meets the

requirement under subd. 2. and is not ineligible under ar. (b).

2. At least 80% of the parcel must be producing or capable of producing a minimum of 20 cubic feet of merchantable timber per

acre per year.

(b) The following land is not eligible for designation as managed forest land:

1. A parcel of which more than 20% consists of land that is

unsuitable for producing merchantable timber, including water, marsh, muskeg, bog, rock outcrops, sand dunes, farmland, roadway or railroad and utility rights-of-way.

2. A parcel that is developed for commercial recreation, for industry or for any other use determined by the department to be incompatible with the practice of forestry.

3. A parcel that is developed for a human residence.

(bn) For purposes of par. (b) 3., the department by rule shall define "human residence" to include a residence of the applicant regardless of whether it is the applicant's primary residence. The definition may also include up to one acre surrounding the residence for a residence that is not the applicant's primary residence.

(c) In addition to the requirements under pars. (a) and (b), for land subject to an application under sub. (4m), all forest croplands owned by the applicant on the date on which the application is filed that are located in the municipality or municipalities for which the application is filed shall be included in the application.

b. The Group Organization must designate a Group Manager(s) that is responsible for overseeing all of the administrative details of ATFS Group Certification and for ensuring compliance with all applicable requirements.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: The Division of Forestry Forest Tax Law Program and Policy Chief is designated as the group manager who administers the affairs of the MFL Certified Group. More broadly, the group manager may delegate authority to the WDNR Sustainable Forest Certification Coordinator, other central office staff, regional staff and cooperating foresters.

# 1.3 Group Membership

a. The Group Organization must inform Group Members of any and all fees associated with administration of the Group, if any, when they join the group organization.

 $\forall$  Yes  $\Box$  No  $\Box$  N.A. Audit Notes: WDNR does not charge any fees associated with the administration of the Group.

b. The Group Organization must hold the ATFS Certificate on behalf of the Group Members  $\forall$ Yes  $\Box$  No  $\Box$  N.A. Audit Notes: WDNR does hold the Certificate.

c. The Group Organization must follow the ATFS logo use guidelines and ensure proper use of promotional claims about the Group Certification.

 $\bigvee$ Yes  $\square$  No  $\square$  N.A. Audit Notes: WDNR is aware of the ATFS logo use guidelines and ensures proper use of promotional claims about group certification. The logo is correctly used on the website. Site visits indicated ATF signs were used appropriately.

d. The Group Organization must have a document issued to each Group Member that confirms the Group Member participation and coverage by the scope of the third-party certificate.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: The application for enrollment in the MLF program has a declaration that contains: I/we understand that participation in the MFL program will automatically result in membership in the MFL Certified Group unless MFL Certified Group Departure Request is submitted.

Material given to potential members includes the document "Wisconsin's Managed Forest Law – a program summary" that includes this language: "An independent certification body verifies that MFL Group lands

are managed in conformance with American Tree Farm System (ATFS) and Forest Stewardship Council (FSC) standards of responsible forestry."

# 1.4 Group Member Entry & Departure from the Group Organization

a. The Group Organization must ensure that Group Members are notified that they are subject to all of the requirements and privileges of membership in the American Tree Farm System. Under this requirement, category 1 Group Members must be notified to the individual landowner level and category 2 Group Members must be notified to the portfolio level.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: The application for enrollment in the MLF program has a declaration that contains: I/we understand that participation in the MFL program will automatically result in membership in the MFL Certified Group unless MFL Certified Group Departure Request is submitted.

Material given to potential members includes the document "Wisconsin's Managed Forest Law – a program summary" that includes this language: "An independent certification body verifies that MFL Group lands are managed in conformance with American Tree Farm System (ATFS) and Forest Stewardship Council (FSC) standards of responsible forestry."

b. The Group Organization must define and administer a procedure for admitting Group Members.  $\boxtimes$  Yes  $\square$  No  $\square$  N.A. Audit Notes: Procedures for admitting group members are the same as for admittance into MLF. These procedures are extensive and found in various portions of the "Tax Law Handbook".

c. The Group Organization must maintain a procedure for expelling Group Members if they do not meet the requirements of the AFF Standard, and are not willing or able to take appropriate corrective action.

- ☑Yes □ No □ N.A. Audit Notes: MFL Certified Group membership for an MFL Order may be deactivated under any of the following circumstances following appropriate procedures as outlined in Chapter 60 on Enforcement:
- 1. Voluntary withdrawal from MFL
- 2. Involuntary MFL declassification
- 3. MFL order expiration
- 4. Use of an FSC prohibited, highly hazardous pesticide

5. Planting FSC-prohibited Genetically Modified Organisms (GMOs) in a forest

6. Mixing forest products harvested from non-MFL Group land with MFL Group wood to falsely claim the non-MFL products under the MFL Chain of Custody certification.

7. Willful or blatant violations of Wisconsin Forestry Best Management Practices

8. Refusal to allow forest certification auditors or DNR staff onto the property for the purpose of conformance reviews.

9. Deliberate or repeated violations of federal, state or local laws and regulations applicable to forest management.

10. Inappropriate use of certification logos or trademarks

11. Deliberate or manifest nonconformance with other forest certification indicators

Interviews with staff indicate members are occasionally expelled.

d. The Group Organization must maintain and update the membership list and ATFS database to reflect entries and departures of Group Members from the Group Organization.

**Yes No N.A.** Audit Notes: WDNR maintains a database that contains all required information about current members. Information about departures is maintained in the History database.

## **1.5 Dispute Resolution**

a. The Group Organization must have a procedure for addressing and resolving disputes regarding conformance with the AFF Standards between and among the Group Members and the Group Organization pertaining to Tree Farm certification.

**Yes No N.A.** Audit Notes: The Forest Tax Law Handbook has a section titled: Enforcement and Dispute Resolution Process.

b. The Group Organization must follow and conform to the AFF Dispute Resolution Policy and assist ATFS in resolving any such complaints.

Yes **No N.A.** Audit Notes: WDNR's dispute resolution process conforms to the AFF Policy.

## 1.6 Maintaining Records of Group Member

a. The Group Organization must maintain internal Group Member records and provide updated information on a regular basis to the ATFS Database.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: WDNR maintains a database that contains all required information about current members. Information is provided to ATFS on an annual basis as requested by ATFS.

# Section 2. Requirements of Participation in the American Tree Farm System

## 2.1 Access to the AFF Standards

a. The Group Organization must make the AFF Standards of Sustainability for Forest Certification accessible to Group Members.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: Confirmed the Standards are accessible via external links on WDNR's website.

## 2.2 Conformance with AFF Standards

a. The group organization must have a procedure for evaluating conformance with AFF Standards prior to property enrollment under the group certificate.

**Yes No N.A.** Audit Notes: Procedures for admitting group members are the same as for admittance into MFL. These procedures are extensive and found in various portions of the "Tax Law Handbook".

b. Management Plan:

The Group Organization must ensure that each Group Member either has an individual management plan or is covered by a larger group management plan where responsibility for management has been delegated to a Category 2 with a qualified natural resource professional.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: WDNR requires that each group member have a current management plan. DNR provides potential group members with a list of Certified Plan Writers. DNR will write the plan if a Certified Plan Writer cannot be located.

## 2.3 Eligibility

a. The Group Organization must have a procedure for evaluating eligibility according to the ATFS Eligibility Requirements prior to property enrollment under the group certificate.

**Yes No N.A.** Audit Notes: Procedures for admitting group members are the same as for admittance into MFL. These procedures are extensive and found in various portions of the "Tax Law Handbook".

# Section 3. Internal Monitoring and Reporting

## **3.1 Ongoing Monitoring**

a. The Group Organization must establish and maintain a procedure and schedule for conducting ongoing monitoring of conformance with the AFF Standards.

 $\bigvee$ Yes  $\square$  No  $\square$  N.A. Audit Notes: DNR has a unique system to monitor conformance. Certified Plan Writers complete a Land Exam and Practices Report for new members in conjunction with developing the management plan. This report contains stand level data as well as management prescriptions. This data is entered into Plan Trac which sends alerts to the DNR district foresters who notify the landowners of the prescriptions that need to be done. District foresters confirm the prescription is done and indicate this in Plan Trac.

b. IMG Inspectors of the Group Organization conducting internal monitoring must have completed the current ATFS Tree Farm Inspector training course.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: Review of the DNR training database indicates inspectors have taken the most recent training. This was a minor non-conformance in 2011.

c. The Group Organization must review conformance to the AFF Standards and document the relevant findings.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: WDNR has a unique system to monitor conformance. Certified Plan Writers complete a Land Exam and Practices Report for new members in conjunction with developing the management plan. This report contains stand level data as well as management prescriptions. This data is entered into Plan Trac which sends alerts to the DNR district foresters who notify the landowners of the prescriptions that need to be done. District foresters confirm the prescription is done and indicate this in Plan Trac.

d. Where a non-conformance is identified during ongoing monitoring, the Group Organization must document the non-conformity and work with the Group Member and other appropriate parties to take corrective action.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: WDNR has a detailed procedure for working with Group Members with a non-conformity found in the Forest Tax Law Handbook, Section 60 which includes: multiple

meetings and correspondence with the member, fines and finally, expulsion. These activities are documented on the Management Recommendation Records completed by the foresters.

e. The Group Organization must ensure implementation of the corrective action and monitor conformity as part of the regular schedule of internal monitoring.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: Forest Tax Law Handbook contains procedures to ensure conformities are resolved. This is documented on the Management Recommendation Records completed by the foresters.

## 3.2 Annual Reporting to the American Tree Farm System

a. The Group Organization must adhere to the annual reporting requirements as defined by ATFS and maintain copies of past annual reports.

 $\bigvee$  Yes  $\square$  No  $\square$  N.A. Audit Notes: Confirmed via review of Group Certification Annual report that it was submitted to national on February 1, 2012.

# Section 4. Independent Audit

## 4.1 Managing the Group Certification Process

a. The Group Organization must contract with an accredited Certification Body to conduct the independent certification. Accredited Certification Body is required to conduct the audit according to accreditation rule under ANSI – American National Accreditation Body or the Standards Council of Canada.  $\bigvee$  Yes  $\bigcirc$  No  $\bigcirc$  N.A. Audit Notes: WDNR has contracted with NSF to conduct an independent certification according to the ANSI accreditation rules.

b. The Group Organization must coordinate the independent audit procedure to ensure the Certification Body has access to sufficient information and Group Member properties to determine conformance to the AFF Standard and ATFS Group Certification Standard.

 $\forall$ Yes  $\Box$  No  $\Box$  N.A. Audit Notes: All auditors were provided with all the information they requested.

c. If the certification audit results in a non-conformity, the Group Organization must work with all appropriate parties take corrective action and ensure timely implementation. **Yes No N.A.** Audit Notes: Non-conformities identified in the 2011 audit were adequately addressed.

d. The Group Organization must submit a copy of the ATFS Certificate and a summary of the audit report that is appropriate for public distribution to ATFS.

**Yes No N.A.** Audit Notes: Interview with ATFS Certification Manager indicates the report was submitted.

e. The Group Organization must keep the Group Organization's program up-to-date and in ongoing conformance with the AFF Standard.

**Yes No N.A.** Audit Notes: Review of DNR Group Program indicates it is up-to-date.

Appendix IV



ATFS Audit Reporting Form

# **ATFS Audit Reporting Form**

Note: This form is to be started by the Lead Auditor with assistance from the group's management representative. It is to be included as the final page of the ATFS Audit Report. After the final report is approved by the NSF CB Reviewer, the form is completed by the NSF Certification Services Specialist (CSS). The CSS will submit the form to:

**Victoria Lockhart,** Certification Manager, American Tree Farm System American Forest Foundation, 1111 19th St., NW, Washington, DC 20036 (T) 202 463 2738 (F) 202 463 2461 vlockhart@forestfoundation.org



# American Tree Farm System

# Form for Reporting a Forest Management Certificate

For groups certified in conformance to the American Forest Foundation Standards of Sustainability for Forest Management 2004-2009

### **CERTIFICATE INFORMATION**

| Certificate Holder Name            | Wisconsin Managed Forest Law Tree |
|------------------------------------|-----------------------------------|
|                                    | Farm Group                        |
| Certification Body Name            | NSF                               |
| Certificate Number                 | 1Y942-FC1                         |
| Certification Date                 | 8-Aug-11                          |
| Certificate Expiry Date            | 7-Aug-14                          |
| Number of Properties Certified     | 36,057                            |
| Number of Landowners Enrolled When |                                   |
| Certification Issued               |                                   |

### **CERTIFIED FOREST INFORMATION**

| Forest Area (to which certification applies)  | 2,441,260 |
|---|-----------|
| Listing by State [if certificate covers       | WI        |
| forestland located in more than one state –   |           |
| for accounting purposes]                      |           |
| Land Ownership Type                           | Cat 1     |
| Is this same area certified to another forest | FSC       |

| management standard? |  |
|----------------------|--|
|                      |  |

## **GROUP ENTITY CONTACT INFORMATION**

| Contact Name | Kathy Nelson               |
|--------------|----------------------------|
| Street, No.  | 101 South Webster St Fr/4  |
| City, State  | Madison, WI                |
| Zip Code     | 53703                      |
| Telephone    | (608) 266-3545             |
| E-mail       | Kathy.nelson@wisconsin.gov |
| Fax          | (608) 266-8576             |
| Web Address  |                            |

### **CERTIFICATION BODY CONTACT INFORMATION**

| Contact Name |  |
|--------------|--|
| Street, No.  |  |
| City, State  |  |
| Zip Code     |  |
| Telephone    |  |
| E-mail       |  |
| Fax          |  |
| Web Address  |  |

# **Reporting Guidelines for Forest Management Certificates**

### Changes to Certification Status

Certification bodies are asked to report certifications and decertifications as they become aware of this status. In the case of a change in ownership, the new entity's certification will only be included when a certificate is issued in the new organization's name by an accredited certification body.

### **Reporting Frequency**

Certification bodies are responsible for completing the American Tree Farm System Certificate Reporting Form at the time of the certification audit, surveillance audit, and recertification audit.

### **Reporting Improvement**

Certification bodies are welcome to propose a new reporting guidelines or change to the existing guidelines that they feel will benefit the transparency and consistency of reporting. All suggestions are welcome and will be considered. If an organization becomes aware of a certification that was reported incorrectly, please bring it to AFF staffs' attention.