

# FSC® - Forest Management Digital Audit Report Supplement

## *Wisconsin Department of Natural Resources – County Forest Program*

**SCS-FM/COC-00083G**

Certificate Holder Address	Wisconsin DNR - Forestry Division 101 S Webster Street PO Box 7921 Madison, WI 53703
Certificate Holder Contact	Jake Walcisak jacob.walcisak@wisconsin.gov
Certificate Holder Website	<a href="https://dnr.wisconsin.gov/topic/CountyForests">https://dnr.wisconsin.gov/topic/CountyForests</a>

CERTIFIED	EXPIRATION
December 22, 2024	December 21, 2029

DATE OF FIELD EVALUATION
05-09 August 2024
DATE OF REPORT FINALIZATION
October 22, 2024

TYPE OF EVALUATION	
<input type="checkbox"/> Main Evaluation	<input type="checkbox"/> 1st Surveillance
<input checked="" type="checkbox"/> Re-Evaluation	<input type="checkbox"/> 2nd Surveillance
<input type="checkbox"/> Transfer	<input type="checkbox"/> 3rd Surveillance
<input type="checkbox"/> Expansion of Scope	<input type="checkbox"/> 4th Surveillance
	<input type="checkbox"/> Other Surveillance: #

This document contains the conformity tables and certificate tracking information that together with the Digital Audit Report constitute a complete FSC Forest Management Audit Report.

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## Appendix 1 – Staff and Stakeholders Consulted

### List of FME Staff Consulted

To protect privacy, only FME staff who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**

#### County Forests Certification - Opening Meeting

Name	Role
Walczak, Jacob S - DNR	DNR Forest Certification Coordinator
Coady, Joshua J - DNR	DNR Public Forestry Specialist
Blaylock, Matthew D - DNR	DNR Area Forestry Leader - Park Falls
Dave Kafura (Unverified)	WCFA - Technical and Resource Advisor
Gillen, Jean-Michel - DNR	DNR Forestry Team Leader - Rhinelander
Jake Truitt (Unverified)	County Forester - Oneida
Tanya (Unverified)	County Forest Office Coordinator - Oneida
Zahasky, Jim	County Forest Administrator - Jackson
Broquard, Katarina L - DNR	DNR Forester - Mercer
Warren, James K - DNR	DNR Bureau Chief - Forestry Field Operations
Allen, Timothy C - DNR	DNR Forester - Medford
Didier, Cody C - DNR	DNR Forest Tax Law Compliance Coordinator
Lambert, Kristin E - DNR	DNR Forestry Section Chief - Public/Private Lands
Onchuck, Thomas A - DNR	DNR Forestry Team Leader - Park Falls
Koch, Amanda A - DNR	DNR Forestry Policy Specialist
Morales, Amy L - DNR	DNR Forestry District Leader - Northwest
Heimstead, Paul F - DNR	DNR Forester - Balsam Lake
Tom Harlan	SCS Auditor
Johnson, Kyle M - DNR	DNR Forester Tech - Augusta
Severson, Ryan J - DNR	DNR Forestry Area Leader
Curtiss Lindner (External)	County Forest Administrator - Clark
Wysocki, Adam D - DNR	DNR Forester - Friendship

#### County Forest Certification - Closing Meeting

Name	Role
Walczak, Jacob S - DNR	DNR Forest Certification Coordinator
Coady, Joshua J - DNR	DNR Public Forestry Specialist
fiene.pl@charter.net	Oneida County Forest (retired)
Dane Gravesen	County Forest Assistant Administrator - Rusk
Tom Lovlien (External)	County Forest Administrator - Marathon
Curtiss Lindner (External)	County Forest Administrator - Clark
Brown, Ryan T - DNR	DNR Forestry Technician - Eagle River
Gillen, Jean-Michel - DNR	DNR Forestry Team Leader - Rhinelander

Onchuck, Thomas A - DNR	DNR Forestry Team Leader - Park Falls
Jason Bodine	County Forest Administrator - Bayfield
Kriehn, Jacob D - DNR	DNR Forester - Wausaukee
Jake Truitt (Unverified)	County Forester - Oneida
Blake, Samuel W - DNR	DNR Forester - Crandon
Tanya Tischendorf (Unverified)	County Forest Office Coordinator - Oneida
Warren, James K - DNR	DNR Bureau Chief - Forestry Field Operations
Dean Bowe	County Forest Administrator - Lincoln
Lambert, Kristin E - DNR	DNR Forestry Section Chief - Public/Private Lands
Ryan Bourassa (Unverified)	County Forest Administrator - Marinette
Prichard, Teague - DNR	DNR State Forest Specialist
Schmidt, Kyle J - DNR	DNR Forester - Prentice
Josh Pedersen	County Forest Administrator - Eau Claire
Didier, Cody C - DNR	DNR Forest Tax Law Compliance Coordinator
Berklund, Heather A - DNR	DNR Chief State Forester
Marcus Isaacson (Unverified)	County Forester - Marinette
Mike Peterson (Unverified)	County Forest Administrator - Washburn
Blaylock, Matthew D - DNR	DNR Area Forestry Leader - Park Falls
Peterson, Eric F - DNR	DNR Forester - Webster
Hardin, Carmen R - DNR	DNR Bureau Director - Applied Forestry

**List of other FME Staff Consulted**

Name	Role
Walcisak, Jacob S - DNR	DNR Forest Certification Coordinator
Brown, Doug - DNR	County Forest & Public Lands Specialist
Coady, Joshua J - DNR	DNR Public Forestry Specialist
Dane Gravesen	County Forest Assistant Administrator - Rusk
Tom Lovlien (External)	County Forest Administrator - Marathon
Curtiss Lindner (External)	County Forest Administrator - Clark
Brown, Ryan T - DNR	DNR Forestry Technician - Eagle River
Gillen, Jean-Michel - DNR	DNR Forestry Team Leader - Rhinelander
Onchuck, Thomas A - DNR	DNR Forestry Team Leader - Park Falls
Jason Bodine	County Forest Administrator - Bayfield
Kriehn, Jacob D - DNR	DNR Forester - Wausaukee
Jake Truitt	County Forester - Oneida
Blake, Samuel W - DNR	DNR Forester - Crandon
Tanya Tischendorf	County Forest Office Coordinator - Oneida
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Prichard, Teague - DNR	DNR State Forest Specialist

Schmidt, Kyle J - DNR	DNR Forester - Prentice
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Berklund, Heather A - DNR	DNR Chief State Forester
Marcus Isaacson	County Forester - Marinette
Mike Peterson	County Forest Administrator - Washburn
Blaylock, Matthew D - DNR	DNR Area Forestry Leader - Park Falls
Peterson, Eric F - DNR	DNR Forester - Webster
Hardin, Carmen R - DNR	DNR Bureau Director - Applied Forestry

**List of other Stakeholders Consulted\***

- Vilas County Forestry Department - Park & Rec Supervisor
- Landover Saddle Club Member
- St. Germain Snowmobile Club Member
- Sno-Eagles Snowmobile Club Member
- Bo-Boen Snowmobile Club Member
- Great Headwaters Trail (Bike Trails) Member
- Landover Dual Sports Off-Road Motorcycle Club Member

To protect privacy, only stakeholders who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**

*\* Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities, such communications are retained by SCS subject to FSC and ASI examination.*

**Appendix 2 – Additional Evaluation Techniques Employed**

**Site Notes:**

08/06/2024

Site	Location	Notes:
SG/KM/TH-1	Vilas County – Eagle River Office	<p>County Opening Meeting: Introductions, client update, review audit scope, review audit plan, confidentiality, conformance evaluation methods and tools, emergency and security procedures for audit team, and final site selection adjustments. Review any ongoing issues and/or stakeholder concerns.</p> <p>Reviewed Training records for Jerome Wotachekthat included first aid, chain saw, BMP, climate adaption and NHI trainings.</p> <p>Reviewed Pesticide book and interviewed Jerome Wotachek Jerome is a licensed pesticide applicator which was confirmed by reviewing his certificate, reviewed prescription for application that used Roundup PowerMax and Oust XP. Jerome stated that he refers to the</p>

		<p>label for application rates and normally uses less than the label rate. The Natural Heritage Inventory is reviewed prior to spraying any chemicals. Jerome is working with a bike trail riders group to spray the county forest portion of the trail to control invasives.</p> <p>Reviewed Pesticide storage cabinet that is located in the truck bay that is locked when no one is at the office. There is a sign out sheet that is used when any spray application is going on. There is also a spill kit and an eye wash material that taken to the field while spraying in case of any issues. The SDS sheets are located in the office.</p> <p>Reviewed the file for the first stop of the day, logger was TSI Logging Inc, the SFI training for TSI was confirmed and a copy of the form is in the file, The training is saved in FISTA. Reviewed form 2460 which contains the requirements for the harvest, reviewed the timber sale checklist and the presale checklist that is reviewed with the contractor, maps of the sale area were in the file, scale slips and load tags were noted in the file and income from each scale slip was also noted.</p>
SG/KM/TH-2	Sale #1062 Tract 8-23	<p>Approved 2022. Cut 2023. 80 acres. Aspen coppice. Red pine thinning. White pine shelter wood. Keep oak and white pine as climate adaptation for species diversity. Aspen and red pine might not do as well under climate scenario. Maintain species diversity for climate and wildlife. Also keep black spruce. Sale boundary verification. Green tree retention zone to avoid small RMZ and have screen trees along highly recreationalriver.</p> <p>Viewed pre-sale checklist and 2460. Pine cut tree mark. Use 10 BAF and Forest Metrics for volume cruise. NHI hits present. WI River buffered by 100' RMZ. 2-5 year regen survey done for aspen. Viewed hardwood understory in planted pine stands.</p>
SG/KM/TH-3	Torch Lake Campground	<p>County owned and maintained campground 41 sites. Interview campground host. 5-month seasonal employee host. Sites cost \$45-50 night with full services. Large campsites. Well maintained restrooms and facilities.</p>
SG/KM/TH-4	Sale #1047 Tract 3-22	<p>Approved 2022. Cut 2022. Red pine thinning. 1st and 4th thinning. 50 acres. ATV trails. Widened county roads for fire resiliency. Wood turtle and spruce grouse. Kirtland's Warbler monitoring.</p> <p>66-year-old stand. Reduced BA from 170 to 120. NHI mitigation no-cut 4/1 – 10/1. Discussed public access policy (off-road vehicles prohibited, permits required for x-mass trees, etc.)</p>

SG/KM/TH-5	Sale #1053 Tract 12-22	<p>Approved 2022. Aspen coppice (55 ac) , 1st and 2nd red pine thinnings. Spruce/jack pine seed tree. 113 acres. Sale boundary verification. Black spruce regeneration.</p> <p>Ground scaling done for small residual piles, must be hauled by contractor prior to performance bond being returned. White pine marked for retention. RMZ buffer along Tamarack Creek.</p>
SG/KM/TH-6	Tamarack Springs Campground	<p>Stakeholder lunch with ATV, equestrian, off-road motorcycle, and trail bike clubs. Campground renovated in 2018 by ORM club and three trails constructed totaling 22 miles. County built new restrooms. Grant was used to build new pavilion. Equestrian club has 30 miles of dedicated trails for hiking and riding. One multi-use trail on-site. Clubs report very good cooperation and no conflicts among the user groups.</p>
SG/KM/TH-7	Sale #1031 Tract 20-20	<p>Approved 2021. Langley Salvage. 107 acres. Windstorm damage. 50% of aspen stand blew over. Leave undamaged oak or pine. Recreation trails closed and relocated. Filter strips left around ephemeral and permanent ponds. Small area left for green tree retention. Cut spring 2021 and spring 2022.</p> <p>Discussed BMP monitoring program. 5 year reporting cycle. 30-40 sites of 700 total harvests per year. Results inform BMP training courses for WI County Forest Association meetings and FISTA courses. Results publicly available on the website.</p>
SG/KM/TH-8	Sale #1041 Tract 7-21	<p>Approved 2021. JP regeneration. Summer 2022, Fall 2022 used anchor chain to scarify. Regen survey in 2024 or 2025. May do inter-planting to meet stocking of 500-600 Tpa. Would like to have 1,000 Tpa. Boundary Verification.</p> <p>Discussed stakeholder notification for timber sales. Notice posted in local newspaper twice. Letters sent to adjacent landowners. Sawhorse sale cancelled in 2019 due to stakeholder concerns with pesticide applications.</p>
SG/KM/TH-9	Active Timber Sale	<p>Equipment and landing inspection. No crew present. Ponsse harvester and forwarder. 1058 sale. 5 gallon minimum reportable spill. Any size spill must be cleaned.. Landing COC discussion. Load tickets purchased and kept on-site by logging contractor.</p>
SG/KM/TH-10	Sale #1055 Tract 14-23	<p>Clear 2.5 miles of existing road to day light road and repair damage to road. Direct sale due to low cut volume. NHI review. Capital Improvement project. March 1 to May 1 harvest to avoid NHI damage. Sale closed in WISFRS. Final BMPs installed by county staff.</p>
SG/KM/TH-11	Sale #1064 Tract 12-23	<p>Approved 2023. 54 acres. RP 1st thinning, white birch seed tree, white pine seed tree. Sold 2023. Harvesting started in 2024.</p>

		<p>Greentree retention along lakes and for aesthetics in WP seed tree. Property boundary verification. Sale set-up by DNR for county using allocated time standard hours.</p> <p>Discussed how Natural Heritage Inventory (NHI) is populated. NHC does systematic statewide survey for RTE species. New occurrence can be documents by DNR staff if something is found or through notification of the general public after being confirmed by DNR biologist.</p>
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08/07/2024

Site	Location	Notes:
SG/TH - 1	Price County Office	<p>92,000 + acres in CF program, working on 40 year rotation for aspen, annual allowable harvest is 2,000 acres per year, DNR allocates 1,360 hours per year for Price Co. work.</p> <p>Training Records Reviewed:                      Fred Freeman – Assistant Forest Administrator - Pesticide Applicators License Cert. expires 6/2029, first aid/CPR/AED, BMP, chainsaw, more certificates from other years.                      Luke Bogdanovic – Forester – been on job almost 2 years – Pesticide Applicators License expires 2/2029, Chainsaw safety, FISTA Basic Core II class.</p> <p>Timber Sale folder reviewed – included Timber Sale Completion Checklist that shows what has been done at the end of logging (performance bond returned, WisFRIS update, etc), scale slips, scale slip reconciliation spreadsheet, logger’s insurance policy, harvest inspection report, logger training check, and contract. Timber contract has clauses that cover Forest Certification, BMP requirements, Soil Disturbance guidelines, OSHA requirements, Map and signature page. FISTA training certification check on Mike Blomquist for logging job.</p> <p>Tickets in Price County are issued by the forester and not sold, coffee can is put on site for tickets to be deposited into during logging.</p> <p>Pesticide Storage – in locked building and locked storage cabinet, SDS information binder beside cabinet, some mixing is done in the garage, spill kit consists of “kitty litter”, no special PPE or First aid equipment noted on site.</p>
SG/TH - 2	Tract 13- 21	<p>Boundaries only marked where needed, if timber type change is evident, then the line is not marked. Forester works with loggers to make sure they can use the Avenza app, explains harvest area to logger.</p> <p>Discussed sale prep process: Price Co. has two bid sales for the yearly harvest allowable cut - spring and fall; after fall bids they run a query in WisFRIS for tracts that meet age requirements, the list is checked for accuracy, the selected areas are reconned to make sure they will work, the sale area is marked and cruised, the cruise data is entered into WisFRIS (this data has to be no more than 12 months old for the process to work), enter data into the 2460 form, make map and narrative for 2460. Kyle Schmidt, County Forest Liaison with DNR checks NHI database, historical data and archaeological data for sale area, then the sale goes to the committee for approval, once approved the sale is put out for bids and advertised in the local paper.</p>



		Discussed green tree retention – policy is 3-15% of stand is retained, if possible, noted that rutting policy is in the contract, and discussed reforestation check – Northern hdwd check in 5 years, aspen check in 3 years, plantation check at age 1 and 3, all other check in 1-3 years.
SG/TH - 3	Tract 18- 24	Discussed green up requirements – 5 years or 3 ft tall for adjacent stands. Aspen was over 3 foot tall next to the sold clearcut harvest. Good Practice – marked a RMZ along a cross drainage to protect the site where it was not required. Forester noted that there was plenty of timber and they did not have to go after every stick. Discussed inventory method for sale volume – use 10 BAF prism, take DBH and some total heights, use tables for determining volume, use Cubic Cruise software to calculate, number of plots needed is determined by stand characteristics.
SG/TH - 4	Tract 18- 21	Discussed rutting specs with Jake, no issues on tract, tract was selectively harvested removing the Ash due to EAB issue, there was an old well on site that was mapped and marked out for the loggers safety and site protection, a wind storm happened during logging and the logger was asked to cut the damaged timber – this was noted in the harvest inspection but nowhere else.
SG/TH - 5	Tract 17- 20	Discussed boundary marking along woods road – marked with red paint, discussed single tree selection process and noted orange stump mark on harvested tree, discussed regen check timing.
SG/TH - 6	Tract 17- 23	Inspected GAP process and marking in the selective harvest area, GAP areas are marked with Purple paint and everything within the area is clearcut, these areas are cut to enhance some oak regeneration, the size and location of the GAP's are set in the office and mapped on an Avenza map that is used to find and mark the sites, silvicultural handbook calls for 10% of stand to be in GAP, by setting them up in the office it insures that this target is met, there are 16 GAP areas on this sale and they range from 0.2 acres – 0.9 acres in size. Good Practice – setting up GAP areas in office to minimize forester bias and to ensure proper amount is harvested.

08/08/2024

Site	Location	Notes:
SG/KM/TH- 1	Oneida County Courthouse – Forestry office	Overview of FMU at county office. Review of staff training records, logger qualifications (e.g., FISTA), harvest contracts, and COC records.
SG/KM/TH- 2	Forestry shop	Chemical cabinet inspection and review of application and SDS records. Arsenal and round-up currently in stock. Chemical pesticides are stored separately from other chemicals (e.g., cleaning) and well away from flammable liquids such as oil and gas, which have a separate cabinet in another location in the shop.
SG/KM/TH- 3	Tract 22-20	41 ac. of aspen coppice with reserves (green tree retention blocks). Stands 1 and 26; roughly 20 ac a piece. 6 acres total of green tree

		retention. With stand retention of conifers and oaks. Installed water bars after harvest. Harvest June 2023 and closed Sept. 2023. Green tree block of mixed oak/ aspen for wildlife and protect small wetland for amphibian dispersal. Verification of sale boundaries. Recreation trail maintained in partnership with local trail user organization. Berm between rec trail and logging trail. All trails seeded with clover. No issues with BMPs or NHI.
SG/KM/TH-4	Tract 06-20	62 ac. total with 4 ac. of green tree retention. Aspen coppice with some oak and mixed HW. Retention of conifer and green - marked trees. Sold in 2020. Biomass chipping harvest for local box plant. Harvest 2023 and 2024, frozen conditions required. Sale contract extended. NHI review, no affected species within 0.25 miles. Inspection of chipping site. Logger does all work, including chipping. White pine and oak retention trees within unit. Green paint. Sale boundary marked with red paint. Green tree retention block will be retained when adjacent stand is harvested.
SG/KM/TH-5	Tract 04-24	28 ac. Aspen coppice with removal of most balsam fir. Harvest low ground black ash in swale areas. Retain oak, cedar, yellow birch, white spruce, hemlock, and white pine. No RMZ necessary. NHI areas 1 mile outside of sale area so these are not directly affected. Sale sold June 2024. Active site. Kleinschmidt Logging is the contractor. Contract 1829. Adjacent to private property. Green tree retention representative of original stand left within sale unit. Swamp left outside of sale. Pulp wood and bolt sorts. Logger suggested relocating the primary skid trail to higher ground to avoid wetland impacts. Verification of blue-lined private property boundary. Landowner notified of timber sale and boundary. Monuments are located well outside of timber sale area. Not surveyed, just a harvest line. Staff trained on working with private and public boundary identification. Can use old field identifiers to designate sale boundaries.  Road repair after spring 2022 that led to wash out. Double-culvert replacement after hydrological study to occur in 2025-26. The new size will be 8'x 6' for each culvert due to slope and 100-year flood event model restrictions. Sediment plug will be removed to help culvert last longer (remove scour pressure).
SG/KM/TH-6	Tract 04-20	45 ac. pine clearcut. Harvest completed November 2021. Replant spring 2024 with red pine and white pine (10%) at 1,000 TPA. The harvest is mostly red and white pine, and some aspen and hardwood. Two no-harvest hardwood areas. NHI hits over 1 mile from sale area. No impacted streams or wetlands. Two historic homesteads protected with buffers. No adjacent private lands. Survival check scheduled for 2025. County staff had to do root pruning of bare root stock.
SG/KM/TH-7	Tract 14-21	89 ac, Aspen coppice. Sold 2021. Partially harvested. Must be frozen conditions. Retain birch, elm, cherry. Archaeological site buffered out. Consultation with stakeholders on protection. The contractor

		could lose bond if damage to archeological site. NHI hit over 1 mile from sale. No adjacent landowners. One lowland ephemeral draw that has no minimum RMZ under frozen or dry conditions, 15' otherwise.
SG/KM/TH-8	Tract 17-23	83 ac. Aspen coppice. Sold November 2023. Partially harvested. Some wood is still on the ground. 9 ac green tree retention. Reserve swamp trees around depressions. No NHI and no RMZs. All season harvest allowed under dry or frozen, wildlife opening.
SG/KM/TH-9	Tract 01-20	<p>144 acres, Aspen coppice (40 Ac) and hardwood thinning (104 ac.). Sold in 2020 and harvested in April 2023. Within the coppice all aspen, balsam fir, white birch, red maple, hard maple, and ironwood 1" diameter and larger were to be harvested. All other species such as cedar, tamarack, white spruce, yellow birch, oak, and pine were left as reserves.</p> <p>The management objective for the hardwood thinning area (104 ac.) was to improve stand quality through selective thinning, recruit additional regeneration by establishing canopy gaps and releasing established regeneration. The management goal was to convert this 2-aged hardwood stand to an all-aged stand. The prescription was to thin the stand to ~80 sq. ft. with 2 canopy gaps per acre at 40'-50' wide. Poor quality and high-risk trees were targeted and marked for removal. The prescription in the thinning area was to cut all trees marked with orange paint including all aspen, balsam fir, and ironwood 1" dia. or larger, and to leave all unmarked hardwood, including sapling-sized regeneration.</p> <p>No NHI hits or RMZ necessary. Northern Hardwood to be converted to uneven-aged via single tree and group selection over successive entries. Snowmobile trail cuts through thinning and coppice area. Coppice has conifer retention. Verification of western edge of timber sale boundary.</p>
SG/KM/TH-10	Forestry shop	Daily summary

### Appendix 3 – Required Tracking

#### History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation (2024)	1 <sup>st</sup> Annual Evaluation (year)	2 <sup>nd</sup> Annual Evaluation (year)	3 <sup>rd</sup> Annual Evaluation (year)	4 <sup>th</sup> Annual Evaluation (year)
No findings	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
P1					
P2					

P3					
P4					
P5					
P6					
P7					
P8					
P9					
P10					
COC for FM					
Trademark					
Group					
Other					

**Progressive HCVF Assessments**

FME does not use partial or progressive HCVF assessments.\*

*\*Note: In the case the FME is not operating in the entire management unit, it is permissible to only complete an HCVF assessment for the portion of the unit in which they are operating under special conditions. In such cases, the HCVF assessment must be extended if new areas are entered without an existing, appropriate HCVF assessment having been completed. An example includes a large forest concession where harvesting is initially limited to a smaller geographic scope.*

**Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit**

<input checked="" type="checkbox"/>	Not applicable; no significant issues identified that may impact the next audit.
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*\*Note: information audit team leaders wish to remain confidential may be communicated directly to SCS.*

**Requirements Reviewed in Annual Evaluation**

Evaluation Year	Requirements Reviewed (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.)
2024	All – Indicators FSC-STD Forest Management Standard(s) FSC-US Forest Management Standard V1-0, FSC-STD-50-001 V2-1 Trademark Standard, SCS COC indicators for FMEs V8-0

**Appendix 4 – Forest Management Conformance Table**

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

REQUIREMENT	C/NC	COMMENT/CAR
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<p><b>P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.</b></p>		
<p><b>C1.1 Forest management shall respect all national and local laws and administrative requirements.</b></p>	C	-
<p><b>1.1.a Forest</b> management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and <b>administrative requirements</b> (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <b>Certifying Body</b> (CB) during the annual audit.</p>	C	<p>The Wisconsin County Forest Program (WCFP) was established per County Forest Law (s 28.11 Wis. Stats.) (County Forest Comprehensive Land Use Plans (CLUP) – Ch. 905 (typically), 28.11 Wis. stats., NR 47, NR 48, &amp; NR 51, Wis. Admin. Code.). All management planning documents are based on applicable laws and regulations. Forest Management Plans (FMPs) were reviewed for counties sampled during the audit.</p> <p>A description of the role of DNR liaison foresters working with County Forests can be found in the resource titled <i>WDNR Public Forest Lands Handbook 2460.5</i>. Their primary involvement, as required by statute, is assistance in long-term and annual planning, delivery of technical assistance, and county forest timber sale approvals.</p> <p>County Forest Administrators maintain files with documentation of any violations or lawsuits. No counties reported violations of legal requirements or any new or ongoing lawsuits related to their county forestlands since the last annual surveillance audit.</p>
<p><b>1.1.b</b> To facilitate legal compliance, the <b>forest owner</b> or <b>manager</b> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	C	<p>Contracts reference applicable laws and regulations including OSHA requirements. Similarly, other contracts, such as pesticide contracts reference applicable laws and regulations, including OSHA requirements. Wisconsin DNR &amp; county staff have access to training opportunities that deal with compliance to BMPs, RTE species, and other legal/regulatory requirements. These were confirmed through staff interviews, training records and online resources.</p>

<p><b>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b></p>	<p>C</p>	<p>-</p>
<p><b>1.2.a</b> The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.</p>	<p>C</p>	<p>10% of stumpage payments are made from County Forests (county government) to municipalities (towns) in the form of Severance Tax. These payments are verified during periodic (every 5 years) internal audits of the County Forest program conducted by DNR in each county. The most recent internal audits for each of the counties visited during the 2024 audit were reviewed and payment was confirmed in each of the counties. The procedures for the internal audits are included in the <i>WDNR Public Forest Lands Handbook</i>. In addition, some county forests work with a Citizen Advisory Committee.</p>
<p><b>C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b></p>	<p>C</p>	<p>-</p>
<p><b>1.3.a.</b> Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.</p>	<p>C</p>	<p>Based on a review of the agreements referenced in the indicator, the U.S. is not a signatory and/or has not ratified several of the agreements referenced in the indicator (e.g., many ILO Conventions and Convention on Biodiversity) and others have very limited, or no, direct impact/applicability to county forest management. Any wild ginseng harvests, which are subject to CITES, are regulated according to WDNR protocols.</p>
<p><b>C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.</b></p>	<p>C</p>	<p>-</p>
<p><b>1.4.a.</b> Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.</p>	<p>C</p>	<p>No conflicts between compliance with laws or regulations and FSC Principles, Criteria or Indicators have been identified</p>

<p><b>C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b></p>	<p>C</p>	<p>-</p>
<p>1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <b>Forest Management Unit</b> (FMU).</p>	<p>C</p>	<p>Timber theft, trespass, and other illegal or unauthorized activities on county forests are dealt with locally and are typically investigated by county law enforcement, DNR wardens, or county forest patrol or recreation staff, as confirmed through interviews with county staff. The FMUs are regularly patrolled by county or DNR employees to detect illegal or unauthorized activities. Recreational user groups (e.g., ATV clubs, snowmobile clubs, and mountain biking clubs) are important mechanisms for monitoring the behavior of recreational users. Additionally, active timber sales are monitored by county foresters several times per week, which includes ensuring that illegal or unauthorized activities in harvested sites do not occur. County sheriffs, DNR wardens, and other law enforcement issue citations for ordinance violations (e.g., off-trail ATV use, unpermitted firewood cutting, illegal deer stands, etc.).</p> <p>WCFP takes considerable action to limit illegal and unauthorized activities. Audit team observed gates, berms, and the implementation of other access control techniques including posted signs indicating allowed uses. Surveillance techniques may also be employed in cases of vandalism, trespass, dumping, or other illegal activities.</p> <p>Property boundaries are marked on the ground in advance of timber sales, as well as on harvest map, as verified by the 2024 audit team.</p>
<p>1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all</p>	<p>C</p>	<p>Maintaining a regular presence and good relations with user groups, as described in 1.5.a., are considered actions designed to curtail illegal or unauthorized activities.</p>

<p>land management objectives with consideration of available resources.</p>		<p>Wisconsin law allows flexibility in how timber theft and trespass cases are treated. Fines or payments are set between \$100 and \$10,000, but violators may be subject to criminal prosecution or required to cover additional expenses for the assessment and recovery of stolen timber. No significant instances of timber trespass were reported for the counties sampled in this year’s audit.</p> <p>Illegal harvesting of birch poles and conifer boughs occur on occasion. Monitoring with cameras and on-the-ground enforcement patrols are used to detect violators.</p> <p>Some counties, such as Douglas County, offer an anonymous violation reporting form on their websites that can be used by citizens to submit violation reports. Many counties have brochures that cover a variety of topics, including rules and regulations governing use of the forest, that are available to the general public as mechanisms for public education.</p>
<p><b>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b></p>	<p>C</p>	<p>-</p>
<p><b>1.6.a.</b> The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.</p>	<p>C</p>	<p>All county forests that are FSC certified have made commitments. For example, the following is from the Price County Management Plan: “To that end, Price County will commit to the Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC) in the management of the Price County Forest. These certification standards fit within the framework of the County Forest Law program (s. 28.11, Wis. Stats.)” Likewise, Vilas County Board of Supervisors adopted a resolution on 22 August 2017 that stated; “Whereas, the Vilas County Board of Supervisors on 28 February 2017 formally accepted and committed to dual certification and participation in the Sustainable Forestry Initiative® (SFI®) and the Forest Stewardship Council® (FSC®)</p>



		forest certification systems and management of the Vilas County Forest.”
<b>1.6.b.</b> If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	C	Each county with forests under the Wisconsin County Forest Program has the option to be certified to either or both of the FSC or SFI standard. Of the 30 counties, 21 have attained FSC certification.  Certified county forests may have limited amount of forestlands they hold outside of the FSC certificate, which are documented in the CLUP. In general, excluded forestlands are unsuitable for timber management due to species composition (e.g., low timber value), difficulty in regeneration, and other reasons as stated in each county’s CLUP.
<b>P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b>		
<b>C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</b>	C	-
<b>2.1.a</b> The forest owner or manager provides clear evidence of <i>long-term</i> rights to use and manage the FMU for the purposes described in the management plan.	C	County Land Information Department and Register of Deeds maintain all documentation related to ownership and use rights for all counties. Each county’s CLUP includes an explanation of ownership and use rights and the authority to manage the FMU.
<b>2.1.b</b> The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.	C	Register of Deeds maintains any recorded agreements held with other parties, as verified through a sample of records for counties visited. See County Forest CLUP– Ch 500 for policies specific to public use/access, including any schedule of public use fees. Stakeholders interviewed recognize the use and access rights of multiple user groups.
<b>2.1.c</b> Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.	C	Maps included in timber sale prospectuses for each county visited in 2024 included property boundaries where they existed. Timber sale boundaries were clearly marked with paint in the field and some were set back from any property boundaries, which was confirmed in maps and interviews with staff.
<b>C2.2. Local communities with legal or customary tenure or use rights shall</b>	C	-

<p><b>maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</b></p> <p><i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i></p>		
<p><b>2.2.a</b> The forest owner or manager allows the exercise of <b>tenure</b> and <b>use rights</b> allowable by law or regulation.</p>	C	<p>Evidence of compliance to public access includes field observation of road and trail traffic, deer stands, and other infrastructure for recreation. Interviews with staff indicate a high level of awareness of public access rights and restrictions, rights-of-way, and other use rights.</p> <p>Stakeholders interviewed indicate that counties work collaboratively with different user groups to ensure that these rights are respected while protecting sensitive natural resources.</p>
<p><b>2.2.b</b> In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.</p>	C	<p>Counties hold public meetings on planned management activities, for which records are maintained and publicly available. Many counties also have a Citizen Advisory Committee that includes representatives of different interests, including recreational user groups and other use rights holders. Where tribal resources or rights exist, each county holds consultations with tribes during the management planning process.</p> <p>Interviews with stakeholders confirmed that the counties regularly meet with these groups to ensure that forest management activities are compatible with recreation and other rights.</p>
<p><b>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any</b></p>	C	-

<p><b>outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</b></p>		
<p>2.3.a. If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p>	C	<p>No significant disputes regarding tenure claims or use rights have occurred in the last year. However, the FME has mechanisms in place to seek the input of stakeholders and any disputes through open communication, negotiation, and/or mediation.</p>
<p>2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.</p>	C	<p>The DNR and counties maintain written documentation of any significant disputes over tenure and use rights.</p>
<p><b>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</b></p>		
<p><b>C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</b></p>	NA	<p>FME does not manage any tribally-owned FMUs.</p>
<p><b>C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b></p>	C	-
<p>3.2.a. During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.</p>	C	<p>Indian treaty rights, and specifically Lake Superior Bands of Chippewa, were granted reserved rights to hunt, fish, and gather on all ceded lands in eastern Minnesota and northern Wisconsin as part of the treaties of 1837 and 1842. County board meetings and forestry committee meetings in which policies for resource management are set, provide opportunities for public input, including representatives of American Indian groups. The counties have established formal policies requiring consultation with tribal nations. The DNR and</p>

		counties maintain relationships with local tribes and solicit input as needed.
3.2.b. Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	<p>County and DNR staff are cognizant of the need to ensure that forest management activities do not adversely affect tribal resources. For example, on public lands within the ceded territory, which include county forests, a free permit process is used to provide for tribal gathering of firewood, boughs, tree bark, lodge poles, marsh hay, and maple syrup. A tribal member must provide his/her tribal ID card for this access, which is recorded by the county in which the collection occurs.</p> <p>Additionally, staff are aware of procedures for identifying known archaeological sites and implementing measures to protect them. Maps are protected and not for public use in order to secure locations from artifact hunters and looters. Forest management activities are coordinated with the state archaeologist and Native American tribes. Buffer lines on the ground and on management maps identify the boundary for activity prohibited within the area.</p>
<b>C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</b>	C	-
3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.	C	The <i>Timber Sale Handbook</i> requires a check of the cultural database be included for all county forest timber sales and that such information be included on the timber sale narrative. If special sites have been identified on a specific county, then unit-level descriptions often mention that sites have been found or not. FME staff consult with tribes on the location of known archeological sites, as confirmed in interviews with county staff. The Chippewa and Potawatomi Tribes have rights to hunting and gathering on public lands within the ceded territory. Several of these rights are described in treaties and

		in decisions made during court trials over these rights. The tribes are invited for consultation during management plan writing. The DNR conducts consultations with tribes at broad levels over concerns on certain resources, such as birch bark.
<b>3.3.b</b> In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).	C	In consultation with tribes, the counties have demonstrated protecting special sites during timber harvests.
<b>C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</b>	NA	No traditional knowledge is used in the management of the FMUs.
<b>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b>		
<b>C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b>	C	-
4.1.a. Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry.	C	Employment opportunities at DNR and county forests are non-discriminatory. At counties visited in 2024, state and federal postings were visible at county offices. State hiring processes adhere to strict policies for compliance to equal opportunity, including selecting interview candidates and other measures to ensure fair hiring practices. During interviews, county and DNR staff noted that benefit packages are especially good and include health insurance and pensions.
4.1.b. Forest work is offered in ways that create high quality job opportunities for employees.	C	There is a long average tenure of DNR and county forest staff, which suggests that the quality of work life (compensation, work hours, job security, intangibles, etc.) is desirable. County employees interviewed during the 2024 audit expressed high

		<p>job satisfaction and ample opportunities for training, including DNR-sponsored programs. A sample of training records in personnel files was reviewed, covering a wide variety of topics including invasive species, Natural Heritage Inventory, chainsaw safety, WisFIRS, pesticide application, archeological site identification, among other subjects.</p>
<p>4.1.c. Forest workers are provided with fair wages.</p>	C	<p>County and DNR jobs are quality positions with competitive compensation packages. County employees interviewed stated that wages are comparable to what could be earned in similar positions in private industry. Benefit packages were viewed as being good.</p> <p>Interviewed operators indicated that bid rates accepted by the counties for purchased wood is comparable to current rates in the wood market.</p>
<p>4.1.d. Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.</p>	C	<p>County and DNR employment practices adhere to federal and state laws for exempt and non-exempt employees. As observed in county offices, OSHA and anti-discrimination posters are posted in publicly-visible places.</p> <p>Timber contracts reviewed include stipulations to adhere to federal and state laws, including equal opportunity and non-discrimination.</p>
<p>4.1.e. The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.</p>	C	<p>FME distributes bid prospectuses to a comprehensive list of potential bidders, including local operators. The size of timber sales is varied to allow access to a range of local companies. Direct sales are provided where value is less than \$10,000 and 500 cords which allow small operators to bid on harvest contracts.</p>
<p>4.1.f. Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>	C	<p>DNR liaisons and county forest staff support a large number and wide range of environmental education activities. For example, DNR staff attend public meetings related to the management of county forests and also provide educational opportunities to the public, such as tours.</p>

		Educating the public about Wisconsin’s county forests and the public benefits associated with sustainable forest management is a high priority for Wisconsin County Forests Association (WCFA). The quasi-governmental organization represents the forestry interests of the 30 counties in Wisconsin with lands enrolled under Wisconsin’s County Forest certificate.
4.1.g. The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.	C	FME supports local economic activity by providing access to employment opportunities for local community members, offering timber for bid, and offering other in-woods forestry contract work.  Additionally, county forest and DNR employees reside in small, mid-sized, and large communities throughout Wisconsin and are engaged in civic activities throughout both as private citizens in off hours and as county and DNR representatives during work hours.
<b>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b>	C	-
4.2.a. The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	No serious injuries or fatalities were reported in the last year. Likewise, operators interviewed indicated that no injuries had occurred. Counties reported that there have been no changes in the occupational health and safety regulatory framework in the last year. Accident records for staff are maintained in personnel files, and a sample was reviewed.
4.2.b. The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	C	All employees and contractors were observed using proper PPE during the audit. Contracts reviewed for timber harvests contain safety requirements. Timber contracts reviewed include stipulations to adhere to federal and state laws, including those pertaining to health and safety.
4.2.c. The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	All loggers have FISTA training or also Wisconsin Master Logger certified. Records of contractors’ FISTA training were viewed in county files and confirmed in the FISTA database.

<p><b>C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</b></p>	<p>C</p>	<p>-</p>
<p><b>4.3.a</b> Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>	<p>C</p>	<p>Freedom of association is unambiguously guaranteed for all DNR and county employees. Right to organize is guaranteed by US and State of Wisconsin Law. For all employees of contractors, the standard contract requires the contractor to comply with all applicable labor laws; as such, freedom of association is ensured.</p>
<p><b>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</b></p>	<p>C</p>	<p>-</p>
<p>4.4.a. The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> <li>● Archeological sites and sites of cultural, historical and community significance (on and off the FMU);</li> <li>● Public resources, including air, water and food (hunting, fishing, collecting);</li> <li>● Aesthetics;</li> <li>● Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health;</li> <li>● Community economic opportunities;</li> </ul>	<p>C</p>	<p>County forest and DNR staff that were interviewed are aware of likely social impacts of forest management activities. Examples of incorporating the public social impacts into management planning and operations include: Buffers are placed around the historic Native American sites in order to protect artifacts and structures. Any management near such sites is coordinated with the state archaeologist and Native American tribes.</p> <ul style="list-style-type: none"> <li>● County forests allow camping, hunting, and fishing. Firewood cutting is allowed with a permit. Implementation of Wisconsin BMPs help to protect water quality.</li> <li>● Aesthetic considerations in setting up harvests are common, including aesthetic buffers harvest units.</li> <li>● Among the community goals that county forests provide, recreational opportunities remain important. County forests work closely with recreational user groups such as ATV/UTV, snowmobile, mountain bike, horse riding, and</li> </ul>



<ul style="list-style-type: none"> <li>Other people who may be affected by management operations.</li> </ul> <p>A summary is available to the CB.</p>		<p>cross-country ski clubs to ensure that ample opportunities for recreation are created while protecting natural resources.</p> <ul style="list-style-type: none"> <li>County forests support local economic opportunities by providing employment for local community members, offering timber for bid, and offering other in-woods forestry contract work.</li> <li>The county forest program considers people who may be affected by management operations. For example, neighboring landowners are alerted to harvests, tribes are invited to provide input on management planning, and county board meetings are open to the public and invite comments.</li> </ul> <p>The comprehensive land use plan for each county includes a description of the likely social impacts of management activities and how this understanding is incorporated into management planning and operations.</p>
<p>4.4.b. The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	<p>C</p>	<p>County board meetings and forestry committee meetings in which policies for resource management and work plans are set allow for public input. Those meetings are typically held monthly. County forest administrators are available for the public to provide feedback, and in this way they are constantly evaluating social impacts and incorporating them into management. The Wisconsin Council on Forestry, through the Wisconsin Department of Natural Resources, received a legislative grant for a study of Wisconsin’s forestry practices, including social impacts. The Great Lakes Timber Professionals Association (GLTPA) and WCFA were named joint grant recipients and charged with oversight of the study process and finances</p>
<p>4.4.c. People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	<p>C</p>	<p>County board meetings and forestry committee meetings in which policies for resource management and work plans are established allow for public input. Adjacent landowners are contacted in cases when management activities occur near</p>

		<p>property boundaries or otherwise may affect use rights. County forest administrators are available to the public for people to provide feedback, and in this way they are constantly evaluating social impacts and incorporating them into management.</p>
<p>4.4.d. For <b>public forests</b>, consultation shall include the following components:</p> <ol style="list-style-type: none"> <li>1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans;</li> <li>2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management;</li> <li>3. An accessible and affordable appeals process to planning decisions is available.</li> </ol> <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>	<p>C</p>	<p>The publicly-open county board and forestry committee meetings fulfill this requirement, as well as the administrators being available to the public.</p> <p>The County Forest Law establishes mechanisms for public participation in all planning processes. Annual work plans are open for public comment as advertised in local newspapers and on each county’s website before management activities take place.</p> <p>Appeals are handled prior to plans becoming finalized to avoid conflicts; however, the public may contact their elected county representative or present information during monthly public meetings to appeal decisions. Draft and final plans are made available in county offices and on each county’s website.</p>
<p><b>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</b></p>	<p>C</p>	<p>-</p>
<p>4.5.a The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	<p>C</p>	<p>Through implementation of measures to protect property boundaries and ensure compliance to health and safety laws, the FME avoids negligent actions. Any such cases would be handled through legal staff.</p>

<p><b>4.5.b</b> The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>	<p>C</p>	<p>FME must provide mechanisms for public input on forest management activities per the law that established the program. WCFP maintains communications with the local public and tribes regarding resources of others that may be impacted during management.</p>
<p><b>4.5.c</b> Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.</p>	<p>C</p>	<p>Through interviews with staff, the audit team confirmed that there have been no recent cases of substantiated damage to adjacent lands or permitted use rights.</p>
<p><b>P5 Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</b></p>		
<p><b>C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</b></p>	<p>C</p>	<p>-</p>
<p>5.1.a. The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.</p>	<p>C</p>	<p>On-the-ground observations and interviews with staff demonstrate that the FME is able to implement its core management activities.</p>
<p>5.1.b. Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.</p>	<p>C</p>	<p>While staff levels have fluctuated over time, including a slight reduction now as part of the DNR realignment, the FME has been able to maintain a level of harvesting that is within the AAC and that provides income for operations and counties.</p>

		Evidence suggests that responses to these short-term financial factors are limited to levels that are consistent with fulfillment of the standard.
<b>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</b>	C	-
5.2.a. Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.	C	Through an examination of harvest contracts, interviews with county and DNR employees, and interviews with operators, all loggers and mills were verified as being local. Most harvested material is manufactured into lumber or pulp/paper products locally.
5.2.b. The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.	C	Wisconsin has mills capable of using various grades of timber. Silvicultural prescriptions on the observed WCFP harvest sites promoted the development of high-quality stands of hardwood through TSI and shelterwood harvests. Pulp and paper, firewood, and biomass are options for most county lands on other sites. Examples of optimization were observed in pine thinnings through the use of processors so that varying grades of lumber could be obtained through better utilization.
5.2.c. On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.	C	A wide range of harvest sizes and minimum bid amounts are offered for sale to allow for both small and large businesses to purchase county wood. A review of bid lists verified this practice.
<b>C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</b>	C	-
5.3.a. Management practices are employed to minimize the loss and/or waste of harvested forest products.	C	On all harvest sites visited, there was good utilization of harvested forest products. On pine thinnings and aspen regeneration harvests, the use of processors allow for a high level of utilization

		while spreading slash evenly over the harvest site to retain nutrients onsite.
<p>5.3.b. Harvest practices are managed to protect residual trees and other forest resources, including:</p> <ul style="list-style-type: none"> <li>● soil compaction, <i>rutting</i> and erosion are minimized;</li> <li>● residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected;</li> <li>● damage to NTFPs is minimized during management activities; and</li> <li>● techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.</li> </ul>	C	<p>Loggers have FISTA training, which includes training on measures to implement this indicator. No significant damage to the resource was observed. Examples of measures to avoid damage to soil and water resources includes winter logging in wetlands so that compaction is avoided, using timber mats to cross trails and other sensitive areas, minimizing the number of stream crossings, and flagging no-equipment buffers in green tree retention areas and riparian buffers. Damage to residual stands was minimal.</p>
<p><b>C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</b></p>	C	-
<p>5.4.a. The forest owner or manager demonstrates knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.</p>	C	<p>As confirmed through interviews, county forest and DNR staff have a high level of knowledge of local uses for forest products and recreation. The DNR has conducted economic analyses of entire counties which may contain County Forests. Additionally, the DNR has made each of these economic impact reports publicly available  <a href="https://dnr.wisconsin.gov/topic/forestbusinesses/factsheets#:~:text=The%20forest%20products%20industry%20in,the%20state%20gross%20domestic%20products">https://dnr.wisconsin.gov/topic/forestbusinesses/factsheets#:~:text=The%20forest%20products%20industry%20in,the%20state%20gross%20domestic%20products</a>.</p>
<p>5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.</p>	C	<p>Wisconsin’s Forest Practices Study (WFPS) was used to identify areas where WCFP has opportunities to enhance to diversify its products or services offerings, among other activities to advance forestry and forest practices in the state.</p>
<p><b>C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of</b></p>	C	-

<b>forest services and resources such as watersheds and fisheries.</b>		
5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.	C	WCFP’s mission includes opportunities for hunting, fishing, and other forms of recreation developed in cooperation with other public agencies and stakeholders. These are mentioned in each county’s Comprehensive Land Use Plan.
5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.	C	Evidence observed in the field includes ATV, snowmobile, skiing, mountain biking, and hiking trails. Money from recreation permits is used to manage these resources.
<b>C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</b>	C	-
<p>5.6.a. In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> <li>● documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions;</li> <li>● mortality and decay and other factors that affect net growth;</li> <li>● areas reserved from harvest or subject to harvest restrictions to meet other management goals;</li> </ul>	C	<p>Reconnaissance (recon) of land is a tool utilized in all the county forestry programs in the assessment of geographical, structural, and compositional attributes of existing resources. This field information is stored in the Wisconsin Forest Inventory &amp; Reporting System (WisFIRS) management application. The database is used to analyze existing resources, evaluate management alternatives, and assist in the development and implementation of management plans. Recon is one tool used to assess forest resource information at the property level. All annual forest management activities that are carried out by any program (fish, wildlife, parks, endangered resources, etc.) that alter vegetation in any way (e.g., invasive species treatments, timber stand improvement, site preparation, tree planting, timber sales, and wildlife habitat management) is identified by compartment and stand within the WisFIRS database. Needs listed in the database, in addition to other multi-disciplinary input, is used in determining property budgets and annual work plans.</p>

<ul style="list-style-type: none"> <li>● silvicultural practices that will be employed on the FMU;</li> <li>● management objectives and desired future conditions.</li> </ul> <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>		<p>Minor changes to annual harvest rates occur each year when planning is conducted for each county forest. During planning, if harvest intervals or early or late constraints are changed, the calculated annual allowable harvest changes accordingly. If harvest dates are updated on a large amount of the property, then the AAC can also be impacted.</p> <p>Harvest rates are established using area control methods and the data from WisFIRS. County forestry committees and county boards develop budgets annually, during which AAC acres are considered.</p> <p>There have not been any major adjustments in the FME’s annual allowable harvest rate. Minor changes to AAC occur each year when planning is conducted for each county forest. During planning, if harvest intervals or operating season constraints are changed, then the calculated AAC will change accordingly. Additionally, if harvest dates are updated on a large portion of any one county forest, then the AAC can also be impacted.</p>
<p>5.6.b. Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p>	<p>C</p>	<p>WCFP measures AAH in acres, and that figure varied from county to county.</p> <p>15-year average harvest (AAH) for the FSC-certified counties is 34,226 acres. Goal is +/- of 5% of AAH. 28,517 acres put up last year.</p>
<p>5.6.c. Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	<p>C</p>	<p>WCFP uses standard harvest scheduling established in WisFIRS for each stand type. Future entries are based on ecological goals for the site, species composition, stocking, and past management. A combination of moving harvests forward and delaying harvest is used to ensure a balanced age class distribution over time across the landscape.</p>

<p>5.6.d. For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p>	<p>C</p>	<p>The only significant commercial operations of NTFPs occur on counties with sphagnum moss and resources. Harvest areas and intervals are established based on data from past years that show how quickly the resource can recover.</p> <p>Other NTFPs are small scale and are controlled and harvest volumes monitored through issuing permits (e.g., Christmas trees, conifer boughs, firewood). Permits are also issued to tribal members for gathering of boughs, tree bark, lodge poles, marsh hay, jack pine stumps, and maple syrup.</p> <p>None of the NTFPs are sold as FSC-certified.</p>
<p><b>P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</b></p>		
<p><b>C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</b></p>	<p>C</p>	<p>-</p>
<p>6.1.a. Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:</p> <p>1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>;</p>	<p>C</p>	<p>These topics are covered in each county’s management plan. Forest community types and natural disturbance regimes in Wisconsin are described in the Silvicultural Guidance. The WisFIRS database has these resources mapped. Counties also use supplemental information such as soil maps, LiDAR data for wetland locations, wildlife action plans, and DNR manuals. An inquiry to the Natural Heritage Inventory (NHI) database is included for each project planned on the county forests. These inquiries and the results were</p>



<p>2) <b>Rare, Threatened and Endangered (RTE) species</b> and <b>rare ecological communities</b> (including plant communities);</p> <p>3) Other habitats and species of management concern;</p> <p>4) Water resources and associated riparian habitats and hydrologic functions;</p> <p>5) <b>Soil resources</b>; and</p> <p>6) <b>Historic conditions</b> on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.</p>		<p>confirmed on the Timber Sale Notice and Cutting Reports reviewed during site visits.</p>
<p>6.1.b. Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the <b>best available information</b>, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	<p>C</p>	<p>Impacts to these resources are evaluated when completing a Timber Sale Notice and Cutting Report for each harvest. The forms include the results of evaluations of these resources. Each county's comprehensive land use plan also contains general information on impacts.</p> <p>Items included in the ecological considerations portion of the Timber Sale Notice (form 2460) and Cutting Report include management history, green tree retention, post-harvest regeneration plan, invasive species evaluation, insect/disease concerns, skidding/seasonal restrictions, landscape considerations, wildlife action plan/species of greatest conservation need, results of NHI review, and forest chemical use. Also included on Timber Sale Notice and Cutting Reports are sections on water quality considerations, aesthetic considerations, wildlife considerations, recreation considerations, and resources of special concern (archeological/historical review).</p>
<p>6.1.c. Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and</p>	<p>C</p>	<p>Timber Sale Notice and Cutting Reports document the harvest or management prescriptions and ecological considerations.</p>

<p>implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>		<p>When setting up and implementing harvest units, WCFP uses manuals developed by the Wisconsin DNR: <i>Wisconsin’s Forestry Best Management Practices for Water Quality</i> (PUB FR-093-2010), <i>Timber Sale Handbook</i> (No. 2461), <i>Public Forest Lands Handbook</i>, <i>Ecological Landscapes Handbook</i> (No. 2460.5), and <i>Silvicultural Guidance</i>. These manuals help the county forests avoid negative impacts and meet ecological objectives of management. The Kotar Habitat Classification System is used to assist in making ecological-based harvest plans.</p>
<p>6.1.d. On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	<p>C</p>	<p>Each timber sale is posted in a local newspaper and many are posted on county websites prior to the sale (typically at least 30 days). Confidential portions of the timber sale planning documents, including information on RTE species, sensitive habitats, and archaeological sites, is maintained in a confidential portion of the file and is not available to the general public.</p> <p>Management plans that include broad overviews of 6.1.a are available online and by request. Public input is sought on these drafts. Annual work plans are made available to the public prior to finalization, and any relevant comments received are responded to during public meetings.</p> <p>All final management planning documents are available to the public in county offices, upon request, and many are also posted on county websites.</p>
<p><b>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate</b></p>	<p>C</p>	<p>-</p>

<p><b>hunting, fishing, trapping, and collecting shall be controlled.</b></p>		
<p>6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	<p>C</p>	<p>The Wisconsin NHI database is consulted prior to all forest management activities, and the results are documented in the Timber Sale Notice and Cutting Reports. Foresters work in consultation with DNR Wildlife and NHC staff to address any occurrences in order to ensure protection. Additional site surveys for species are often conducted if the NHI database indicates the need. Sites visited during the audit included protection measures in place for RTE species to avoid the risk of impacts of forest management activities.</p>
<p>6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. <b>Conservation zones</b> and/or <b>protected areas</b> are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	<p>C</p>	
<p>6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.</p>	<p>C</p>	<p>The US Fish and Wildlife Service has developed statewide Habitat Conservation Plans for several species (e.g., Karner Blue Butterfly). Funding is provided to county forests by the DNR to perform habitat improvement work, which can be used for game or non-game species.</p>

<p>6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	<p>C</p>	<p>Activities that may impact RTE species may be conducted under the authority of a broad or site-specific incidental take permit as approved by the DNR. Sites visited included protection measures in place for RTE species to avoid the risk of impacts of forest management activities.</p>
<p><b>C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</b></p>	<p>C</p>	<p>-</p>
<p><b>C6.3.a. Landscape-scale indicators</b></p>		
<p>6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented <b>successional</b> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>	<p>C</p>	<p>Assessments of under-represented, naturally-occurring successional stages occur during comprehensive land use planning processes and annual reconnaissance surveys. Specific FMU goals for management of these areas are described in each county’s comprehensive land use plan and/or in annual work plans. Some of these areas are considered as HCV.</p>
<p>6.3.a.2. When a <b>rare ecological community</b> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <b>conservation zones</b> and/or <b>protected areas</b> are established where warranted.</p>	<p>C</p>	<p>Some of the counties and sites visited during the 2024 audit include ecosystems which not only are rare but also support RTE species. Common modifications included no-entry buffer strips and green tree retention areas.</p>
<p>6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all <b>Type 1</b> and <b>Type 2 old growth</b>. Type 1 and 2 old growth are also protected</p>	<p>C</p>	<p>Relict old growth stands (Type 1) are typed as reserved; there is no active management except for protection from invasive species. In managed old growth stands, any forest management is conducted primarily to maintain or enhance old</p>

<p>and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership.</p>	<p>growth characteristics. Only one of these stands has a planned treatment and that is not until 2099.</p>
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<p>Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> <li>1. Old growth forests comprise a significant portion of the tribal ownership.</li> <li>2. A history of forest stewardship by the tribe exists.</li> <li>3. High Conservation Value Forest attributes are maintained.</li> <li>4. Old-growth structures are maintained.</li> <li>5. Conservation zones representative of old growth stands are established.</li> <li>6. Landscape level considerations are addressed.</li> <li>7. Rare species are protected.</li> </ol>		
<p>6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>C</p>	<p>DNR wildlife biologists work with liaison foresters and county forest administrators to plan and carry out projects for wildlife habitat improvement.</p> <p>Some past examples of efforts to benefit wildlife include the Young Forest Initiative, barrens restoration and management, grouse/woodcock habitat enhancement, and turkey habitat enhancement. Projects are often conducted in partnership with other groups including Ruffed Grouse Society, National Wild Turkey Federation, and US Fish and Wildlife Service.</p>
<p>6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of <b>Riparian Management Zones (RMZs)</b> to provide:</p> <ol style="list-style-type: none"> <li>a) habitat for aquatic species that breed in surrounding uplands;</li> <li>b) habitat for predominantly terrestrial species that breed in adjacent <b>aquatic habitats</b>;</li> <li>c) habitat for species that use riparian areas for feeding, cover, and travel;</li> </ol>	<p>C</p>	<p>Forest management activities regularly occur near riparian and other wetland areas. <i>Wisconsin's Forestry Best Management Practices for Water Quality</i> are followed when conducting management near these areas. BMP, soil disturbance, and ephemeral pond monitoring projects are conducted on county forest lands by the DNR forest hydrologist.</p>

<p>d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</p>		
<p><b>Stand-scale Indicators</b> 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	C	<p>The harvests observed in 2024 are consistent the natural disturbance regimes that would maintain conditions for the species groups found on those sites. For example, aspen regeneration harvests mimic wind and fire events that would naturally keep aspen on the landscape. Oak thinnings and northern hardwood selections harvests are consistent with wind throw and natural mortality events that would promote the growth of healthy trees.</p>
<p>6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. <b>Native species</b> suited to the site are normally selected for regeneration.</p>	C	<p>When planting is required, seed sources predominantly come from areas around the state’s nurseries. Some counties send local seed sources to out-of-state nurseries to be container grown. In some cases, local seed sources are not available for use; in those cases, the next seed source is utilized.</p>
<p>6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, <b>snags</b>, and well-distributed coarse down and dead woody material. <b>Legacy trees</b> where present are not harvested; and b) vertical and horizontal complexity.</p>	C	<p>Completed harvests observed contained snags left, as well as some legacy trees such as conifers within aspen regeneration harvests. Also observed were retained den and cavity trees.</p>

<p>Trees selected for <i>retention</i> are generally representative of the dominant species found on the site.</p>		
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when <i>even-aged systems</i> are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, 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. See Appendix C for additional regional requirements and guidance.</p>	<p>C</p>	<p>When even-aged harvests are conducted, guidelines for green tree retention areas, biomass harvesting, course woody debris are followed, as confirmed in field observation. These guidelines are intended to represent a proportion and configuration that is consistent with the characteristic natural disturbance regime.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> <li>1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture).</li> <li>2. Is based on the totality of the <i>best available information</i> including peer-reviewed science regarding natural</li> </ol>	<p>C</p>	<p>There are no additional restrictions on even-aged management for the Lake States-Central Hardwoods region.</p>



<p>disturbance regimes for the FMU.</p> <ol style="list-style-type: none"> <li>3. Is spatially and temporally explicit and includes maps of proposed openings or areas.</li> <li>4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species.</li> <li>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</li> </ol>		
<p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <b><i>invasive species</i></b>, including:</p> <ol style="list-style-type: none"> <li>1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems;</li> <li>2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</li> <li>3. eradication or control of established invasive populations when feasible: and,</li> <li>4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</li> </ol>	<p>C</p>	<p>The threat of invasive species varies between counties, and each of the counties visited in 2024 have active invasive species control programs.</p> <p>In the last year, chemical treatments for invasives have occurred. Mechanical treatment also was implemented in these counties. Invasive species populations are monitored in follow up visits and re-treated when necessary.</p>

<p>6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	<p>C</p>	<p>Most prescribed burns in Wisconsin are conducted for wildlife habitat purposes. Counties work with the DNR to complete burn plans and coordinate burns on county forests. Barrens management, red oak regeneration, and suppressing woody vegetation in grasslands are common objectives for prescribed fire.</p>
<p><b>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</b></p>	<p>C</p>	<p>-</p>
<p><b>6.4.a</b> The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the <i>landscape</i> (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) <b>GAP analyses</b>; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p> <p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p>	<p>C</p>	<p>The RSA assessment was completed by Wisconsin DNR, which conducted an ecosystem-wide assessment for the entire state followed by a gap analysis. WDNR identified potential RSA areas via aerial photos and then ground-truthed the sites.</p>
<p><b>6.4.b</b> Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties</p>	<p>C</p>	<p>WDNR recommended potential RSAs to county forests. Nearly all recommended RSAs were classified as RSAs; however, the counties refined the on-the-ground analysis by identifying RSA boundaries. RSAs include SNAs and some HCVPs that overlap with RSAs.</p>

<p>are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p> <p>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p>		
<p><b>6.4.c</b> Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p> <p>a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or</p> <p>b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.</p>	C	<p>Barrens, such as the Bauer Brockway Barrens in Jackson County, are managed through fire and management activities designed to act as a surrogate for fire when it cannot be used. The SNA website outlines activities that are permitted or recommended to maintain them, including timber harvests when these are compatible with management objectives.</p>
<p><b>6.4.d</b> The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p>	C	<p>NHI data is continually updated with new information, which is then used to classify any new SNAs as indicated by the size and scope of the new finding.</p>
<p><b>6.4.e</b> Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p>	C	<p>This indicator is met through the establishment of RSAs, HCVs, riparian buffers, and a diversity of seral stages across the landscape.</p>
<p><b>C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction,</b></p>	C	-

<p><b>and all other mechanical disturbances; and to protect water resources.</b></p>		
<p>6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	<p>C</p>	<p>WCFP uses BMPs developed by the Wisconsin DNR (<i>Wisconsin’s Forestry Best Management Practices for Water Quality, PUB FR-093-2010</i>). Per the DNR <i>Timber Sale Handbook</i> (No. 2461), BMPs are mandatory on those county forests that are certified to the FSC FM Standard.</p>
<p>6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	<p>C</p>	<p>All sites evaluated by the 2024 audit team showed the implementation of BMPs, including properly constructed water bars, RMZs, watercourse crossings, and slashed trails.</p>
<p>6.5.c. Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> <li>● Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard.</li> <li>● Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site.</li> <li>● Rutting and compaction is minimized.</li> <li>● Soil erosion is not accelerated.</li> <li>● Burning is only done when consistent with natural disturbance regimes.</li> <li>● Natural ground cover disturbance is minimized to the</li> </ul>	<p>C</p>	<p>Wisconsin BMPs form the base for conformance to this indicator. The 2024 audit team saw good compliance to BMPs during the audit: slash was evenly distributed on an aspen regen harvest to encourage nutrient retention; there was no sign of equipment or logging slash in vernal pools; disturbance of topsoil was minimal; water bars were installed properly and functioning correctly; and water crossings were appropriately designed.</p>

<p>extent necessary to achieve regeneration objectives.</p> <ul style="list-style-type: none"> <li>● Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed.</li> <li>● Low impact equipment and technologies is used where appropriate.</li> </ul>		
<p>6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> <li>● access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts;</li> <li>● road density is minimized;</li> <li>● erosion is minimized;</li> <li>● sediment discharge to streams is minimized;</li> <li>● there is free upstream and downstream passage for aquatic organisms;</li> <li>● impacts of transportation systems on wildlife habitat and migration corridors are minimized;</li> <li>● area converted to roads, landings and skid trails is</li> </ul>	<p>C</p>	<p>Counties follow Wisconsin BMPs, which address many of these issues. The road systems observed were in good condition with permanent roads crowned to shed precipitation and rolling dips. Logging trails had well-constructed waterbars. Harvest areas were designed to minimize road infrastructure, and crossing of streams was limited. Crossings that were observed were well constructed with no erosion evident.</p>

<p>minimized;</p> <ul style="list-style-type: none"> <li>● habitat fragmentation is minimized;</li> <li>● unneeded roads are closed and rehabilitated.</li> </ul>		
<p>6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written <b><i>Streamside Management Zone (SMZ) buffer</i></b> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>	C	<p>Riparian Management Zones (RMZs) are described in Wisconsin’s BMP manual. The manual includes the application of BMPs in wetland environments, including recommended vegetative buffer widths. The BMP manual includes examples of RMZ widths for common situations, such as even-aged aspen harvests.</p>
<p>6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and</p>	C	<p>All RMZ buffer widths observed during the 2024 audit were consistent with those recommended by Wisconsin’s BMP manual.</p>

<p>aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>		
<p>6.5.f. Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of <b>aquatic habitat</b>. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	C	<p>Wisconsin’s BMP manual covers stream crossings with specific examples. The recommended specifications described in the manual are in line with this indicator. Field sites visited in 2024 showed adherence with BMPs. No impediments to aquatic organisms were observed. Timber mats and/or woody debris are typically used to cross sensitive areas, and examples of both were observed.</p>
<p>6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	C	<p>BMPs are designed with compatible multiple uses in mind. Recreation trails such as ATV/UTV and mountain bike trails are constructed to minimize negative impacts to soils, water, plants, wildlife, and wildlife habitats.</p>
<p>6.5.h. Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	C	<p>No grazing with domesticated animals is permitted on county forests.</p>
<p><b>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B</b></p>	C	-

<p><b>and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</b></p>		
<p>6.6.d. Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.</p>	C	Review of chemical application plans and pesticide applicator license records demonstrate compliance with this indicator.
<p><b>6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</b></p>	C	-
<p><b>6.7.a</b> The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills.</p>	C	Loggers, County staff, and WIDNR staff interviewed stated that FISTA training includes procedures for using spill kits. Spill kits were located onsite at an active operation.
<p><b>6.7.b</b> In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate</p>	C	No spills were reported on any of the county properties visited in 2024. Logging equipment observed was in working conditions and with no evidence of persistent leaks.



removal and remediation, as required by applicable law and regulations.		
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved offsite location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	Fuels and other hazardous materials are stored in landing areas observed on active logging sites, which are well away from sensitive areas. No leaks were observed on any of the equipment onsite during the field audit.
<b>6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</b>	C	-
<b>6.8.a</b> Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i> , insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are noninvasive and are safe for native species.	C	Although biological control agents may occasionally be recommended for use in the control of invasive plants and insects per State and federal regulations, county staff do not have the authority to release them.
<b>6.8.b</b> If biological control agents are used, they are applied by trained workers using proper equipment.	C	Only WDNR or other state employees that have been trained in application methods release them (primarily insects or aerial bacterial sprays). Counties are not authorized to release biological control agents.
<b>6.8.c</b> If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific	C	The use of biocontrol agents, such as the beetles used for knapweed control on Bayfield County Forest, are documented and monitored in accordance with state and federal law.

<p>protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.</p>		
<p><b>6.8.d</b> Genetically Modified Organisms (GMOs) are not used for any purpose</p>	C	<p>No use of GMOs was reported by County staff. All seed sources from nurseries are documented and traceable to the provenance or collection area.</p>
<p><b>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	C	-
<p>6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p>	C	<p>With the exception of limited biocontrol agents, exotic species are generally not used on the FMUs for commercial or management purposes. <i>Wisconsin Forestry Best Management Practices for Water Quality</i> (Appendix D) lists non-native species suitable for cover crops for short term erosion control. <i>Wisconsin’s Forestry Best Management Practices for Invasive Species Field Manual</i> lists species recommended for revegetation. Wisconsin DNR analyzed the risk of using non-native species listed in these BMP manuals. County staff follow the guidelines from this evaluation, which indicated low risk of invasiveness and low risk of establishment of a seed bank.</p>
<p>6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.</p>	C	
<p>6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species</p>	C	
<p><b>C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</b>  <b>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</b></p>	C	-
<p><b>6.10.a</b> Forest <i>conversion</i> to non-forest land uses does not occur, except in</p>	C	<p>Documentation of any forests to non-forest use is maintained by county forest administrators. WCFP</p>

<p>circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>		<p>consists of natural forests (including planted natural forests) and no FSC plantations. Counties have not conducted any conversion of forestland to non-forest use.</p>
<p><b>6.10.b</b> Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>No new conversion has taken place.</p>
<p><b>6.10.c</b> Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>No new conversion has taken place.</p>
<p><b>6.10.d</b> Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	C	<p>No conversion of natural/semi-natural stands to non-forest use was not reported or observed during the 2024 assessment.</p>
<p><b>6.10.e</b> Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)</p>	C	<p>The development of some areas of later successional stands through passive management, management of oak-hickory, and riparian lowland hardwood forests with harvests is compatible with achieving landscape biodiversity.</p>
<p><b>6.10.f</b> Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by</p>	NA	<p>No oil, gas or mineral (OGM) rights are reported to be in exercise currently. Counties usually seek to acquire subsurface rights when acquiring new lands. OGM rights may expire in many areas when the rights holder does not exercise the rights within 20 years.</p>

<p>these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>		
<p><b>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</b></p>		
<p><b>C7.1. The management plan and supporting documents shall provide:</b>  <b>a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</b>  <b>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</b>  <b>h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</b>  <b>i) Description and justification of harvesting techniques and equipment to be used.</b></p>	<p>C</p>	<p>-</p>

<p><b>7.1.a</b> The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	<p>C</p>	<p>County-level FMPs include chapters on statutory authority and ownership. County-level FMPs cite Wisconsin Statutes 28.10 and 28.11, the legislation that establishes the authority for establishment of, administration of, and management of county forests. The <i>DNR Public Forest Lands Handbook</i> provides a comprehensive overview of these statutes.</p>
<p><b>7.1.b</b> The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</p>	<p>C</p>	<p>Each county’s FMU describes the history of the forest in each county, the natural features of the forest, and the relevant biological communities and associated resources. Current forest types and age classes are presented in integrated resource management.</p>
<p><b>7.1.c</b> The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.</p>	<p>C</p>	<p>FMPs are complemented by the <i>Wisconsin Forest Management Guidelines</i> (WFMG), published by DNR and revised in 2018. This document presents a history of forest conditions and natural disturbance regimes. Objectives are clearly presented in FMPs, and future conditions and activities are presented in WisFIRS models, AWP, and planning meeting minutes. There is some variation among plans in the presentation of desired future conditions.</p>
<p><b>7.1.d</b> The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.</p>	<p>C</p>	<p>FMPs describe the landscape of each county, and are complemented by a narrative (Form 2460) prepared for all timber sales. To varying degrees, examples of Form 2460 examined had relevant descriptions of the surrounding landscape. FMP also includes reference to landscape management and habitat elements.</p>
<p><b>7.1.e</b> The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</p> <ul style="list-style-type: none"> <li>● rare, threatened, or endangered species and natural communities (see Criterion 6.2);</li> <li>● plant species and community diversity and wildlife habitats (see Criterion 6.3);</li> </ul>	<p>C</p>	<p>FMPs include all of the elements listed in this indicator. Form 2460 and revised appendices of the plans also contain lists of RTE species. Each plan reviewed clearly identified HCVFs protected and managed in cooperation with the State Natural Areas Program.</p>

<ul style="list-style-type: none"> <li>● water resources (see Criterion 6.5);</li> <li>● soil resources (see Criterion 6.3);</li> <li>● Representative Sample Areas (see Criterion 6.4);</li> <li>● High Conservation Value Forests (see Principle 9);</li> </ul> <p>Other special management areas.</p>		
<p><b>7.1.f</b> If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).</p>	C	<p>Each county plan includes lists and management recommendations for invasive species. This is supplemented by an <i>Invasive Species BMP Manual</i> prepared by the Wisconsin Council on Forestry. Invasive species are also addressed on Form 2460 prior to implementation of timber sales.</p>
<p><b>7.1.g</b> The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).</p>	C	<p>County plans address control of forest pests and pathogens. The <i>WDNR Public Forest Lands Handbook 2460.5</i> contains guidance on insects and diseases, with particular emphasis on how to use WisFIRS to develop management options.</p>
<p><b>7.1.h</b> If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.</p>	C	<p>County forests use chemicals sparingly, especially for silviculture, and county management plans mostly address applicable laws and regulations on their use. Each county FMP includes an integrated pest management program, and the WFMG addresses pesticide use. A specific plan is required for each application, approved by the County Forest Administrator and detailed in the WisFIRS Pesticide Tab.</p>
<p><b>7.1.i</b> If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.</p>	C	<p>Similar to chemical use, the Comprehensive Land Use Plan includes general reference to biological controls, if any. A specific plan would be approved, likely requiring an environmental assessment.</p>
<p><b>7.1.j</b> The management plan incorporates the results of the evaluation of social impacts, including:</p> <ul style="list-style-type: none"> <li>● traditional cultural resources and rights of use (see Criterion 2.1);</li> <li>● potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2);</li> </ul>	C	<p>Social impacts are presented mostly in county plans, which include sections on treaty rights, cultural features, administration, training, ordinances, etc. Additional information is found in appendices. WCFA maintains information on socioeconomic impacts of the FME on its website, and was a part of the Wisconsin’s Forest Practices Study (WFPS) to examine the impacts of Wisconsin’s forestry</p>

<ul style="list-style-type: none"> <li>● management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5);</li> <li>● management of aesthetic values (see Indicator 4.4.a);</li> <li>● public access to and use of the forest, and other recreation issues;</li> </ul> <p>local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g).</p>		<p>practices. All of the social impact elements in this indicator are included in the documents that comprise county management plans.</p>
<p><b>7.1.k</b> The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</p>	<p>C</p>	<p>County FMPs and AWP plans address the transportation network. BMP manuals provide descriptions of common methods of maintaining forest roads and trails.</p>
<p><b>7.1.l</b> The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.</p>	<p>C</p>	<p>General references are contained in county plans. The <i>DNR Silviculture Guidance</i> is the primary reference for this element of the plan. Specific silviculture plans are part of Form 2460 and discussed in AWP.</p>
<p><b>7.1.m</b> The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.</p>	<p>C</p>	<p>The degree to which harvest rate calculations are presented in county plans varies, but the <i>Public Lands Handbook</i> is the primary reference for harvest rate calculations along with Help menus in WisFIRS and reoccurring training. Species selection for harvest is a product of annual updates from forest recon and the programming of the WisFIRS system.</p>
<p><b>7.1.n</b> The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.</p>	<p>C</p>	<p>Most of the required monitoring is part of the forest compartment reconnaissance (recon), described in detail in the <i>WDNR Public Forest Lands Handbook 2460.5</i>.</p>
<p><b>7.1.o</b> The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to</p>	<p>C</p>	<p>All relevant maps are included WCFP plans. Maps are also available through WisFIRS and GIS.</p>

<p>achieve management objectives and protect sensitive sites.</p>		
<p><b>7.1.p</b> The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.</p>	<p>C</p>	<p>Although there are general descriptions of harvesting equipment in WFMG, specific requirements for machinery or special provisions for harvesting are included in prescriptions for each harvest and described on Form 2460. Most harvesting on WCFP is done with processors and forwarders, generally considered to have minimal impacts on resources.</p>
<p><b>7.1.q</b> Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.</p>	<p>C</p>	<p>All elements of this indicator are addressed routinely in the harvest prescription and narrative completed before advertising timber sales. This is a multi-disciplinary process, usually involving DNR personnel with expertise in wildlife, fisheries, water, cultural features, etc. See Form 2460 and the AWP.</p> <p>Timber harvest planning is robust and well-documented, fulfilling the requirements of this and related indicators in this standard. As part of the harvest planning, approval and recordkeeping process a Timber Sale Notice and Cutting Report is prepared for all sales. The narrative portion includes the following sections:</p> <ul style="list-style-type: none"> <li>a. General Sale Description</li> <li>b Ecological Considerations, including Management History, Silvicultural Systems, Green Tree Retention, Post-Harvest Regeneration Plan, Invasive Species Evaluation, Insect/Disease Concerns, Skidding/Seasonal Restrictions, Wildlife Action Plan/Species of Greatest Conservation Need, Conservation Opportunity Area (COA), Results of NHI, and Comments</li> <li>c. Water Quality Considerations</li> <li>d. Aesthetic Considerations</li> <li>e. Wildlife Considerations, including Snag, Den and Mast Tree Retention, Game Openings, and Comments</li> <li>f. Recreation Considerations</li> <li>g. Resources of Special Concern Considerations (Archeological / Historical Review)</li> </ul>



<p><b>7.1.r</b> The management plan describes the stakeholder consultation process.</p>	<p>C</p>	<p>WCFP plans describes elements of stakeholder consultation, but this is addressed more specifically by the state statutes requiring environmental assessments and public oversight of county plans.</p>
<p><b>C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</b></p>	<p>C</p>	<p>-</p>
<p>7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.</p>	<p>C</p>	<p>Each county’s 15-year plan was updated in 2021. County forest managers are directed to develop new comprehensive land use plans every 15 years by Wisconsin Statute 28.11(5)(a), although the plans are living documents and updated frequently. AWP’s follow the entry of new data from forest reconnaissance, and annual WisFIRS updates produce new 15-year harvest projections. The planning documents that guide management are updated on an as needed basis, in many cases at least every 10 years. Such documents include the <i>Silvicultural Handbook</i>, <i>Public Forest Lands Handbook</i>, <i>2460 Cutting Notices</i>, <i>Ecological Landscapes</i>, and <i>Annual Work Plans</i> for each county. Assuming that these planning documents continue to play important roles in guiding management of Wisconsin’s County Forests, the 15-year update schedule for the County Forest Comprehensive Land Use Plans is acceptable.</p> <p>Certain components of management planning documents, such as the DNR Silviculture Guidance, are updated at least annually due to the results of scientific and technical information.</p>
<p><b>C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</b></p>	<p>C</p>	<p>-</p>
<p>7.3.a. Workers are qualified to properly implement the management plan; All forest workers are provided with</p>	<p>C</p>	<p>The operator interviewed in 2024 was FISTA-trained; Harvest maps were onsite during active operations. As confirmed in interviews with county and DNR</p>

<p>sufficient guidance and supervision to adequately implement their respective components of the plan.</p>		<p>staff and operators, pre-work meetings are conducted immediately prior to harvesting activity; a sample of pre-sale checklists was reviewed. Additionally, interviews with operators and a review of written inspection forms confirmed regular visits by county foresters during operations. Operators stated that county foresters are accessible if questions arise and that there is regular communication.</p>
<p><b>C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</b></p>	<p>C</p>	<p>-</p>
<p><b>7.4.a</b> While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.</p>	<p>C</p>	<p>The County Forest comprehensive land use plans are posted on most County Forestry Department websites. Plans are also available at publicly available county forest offices. Other components of the management plan are also available.</p>
<p><b>7.4.b</b> Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.</p>	<p>C</p>	<p>Both draft and final plans are made available for public input. WCFP management plans, annual work plans, and annual reports are posted on county website in most counties, and are available in other formats upon request.</p> <p>Monthly meetings with Forestry and Recreation Committees in each county are open to the public. (Note: all counties have such a committee, but committee names vary).</p>
<p><b>P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</b></p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p><b>C8.1. The frequency and intensity of monitoring should be determined by</b></p>	<p>C</p>	<p>-</p>

<p><b>the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</b></p>		
<p><b>8.1.a</b> Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.</p>	C	<p>Most of the required monitoring is part of the forest compartment reconnaissance (recon), described in detail in the <i>WDNR Public Forest Lands Handbook</i>. WisFIRS provides a system for recording monitoring information per DNR-established protocols. Other elements of the monitoring system include field manuals for forest inventory (reconnaissance), and studies commissioned by DNR, the legislature or other bodies. Monitoring strategy is described <i>WDNR Public Forest Lands Handbook</i> and recorded in WisFIRS.</p>
<p><b>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</b></p>	C	-
<p>8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	C	<p>WisFIRS is a comprehensive system for guiding the reconnaissance and inventory of forest compartments as well as for scheduling harvest and other management options of stands. All of the elements listed in this indicator are included in the <i>Wisconsin DNR Public Forest Lands Handbook</i> (No. 2460.5).</p>
<p>8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is</p>	C	<p>No significant, unanticipated removal or loss or increased vulnerability of forest resources has occurred in the last year in the counties sampled. If</p>

<p>monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>		<p>such a loss were to occur, data would be gathered by a special reconnaissance inventory and entered into WisFIRS before annual updates of harvest scheduling.</p>
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	<p>. Recon will be updated, and the next practice scheduled in WisFIRS before the next annual harvest schedule is ran. Records are kept of permits for the harvest of firewood and other non-certified NTFPs, including members of tribes. Harvest data are manually entered into WisFIRS. This data is from the Timber Sale Notice &amp; Cutting Reports. In this respect, WisFIRS is the central repository and mechanism for monitoring the volume of harvested timber over time.</p>
<p>8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> <li>1) Rare, threatened and endangered species and/or their <b>habitats</b>;</li> <li>2) Common and rare plant communities and/or habitat;</li> <li>3) Location, presence and abundance of invasive species;</li> <li>4) Condition of protected areas, set-asides and buffer zones;</li> <li>5) High Conservation Value Forests (see Criterion 9.4).</li> </ol>	<p>C</p>	<p>The DNR conducts wildlife surveys on county forests: nesting bird surveys, grouse transects, summer deer observations, winter track surveys, bear surveys, and a variety of other wildlife and plant monitoring.</p> <p>The NHI database is updated based on the results of statewide inventories, data generated by NHI cooperators at universities, nonprofit organizations, federal and state agencies and individuals; and published literature and reports submitted to the DNR.</p> <p>Foresters are trained to assess sites for invasive plants during routine forest reconnaissance. Invasives are on the recon datasheet to allow for retention of this information. Several counties participate in Cooperative Weed Management Associations. Additionally, the DNR also has a system for gathering invasives information (aquatic, wetland, and terrestrial) from the general public.</p> <p>Forest health monitoring, including gypsy moth and EAB surveys, occurs at the state level. During routine forest reconnaissance, foresters are trained to</p>

		<p>assess sites for invasives. Some counties locate incidents of invasive species detections via GPS for use when controlling and monitoring.</p> <p>As part of monitoring active harvest sites, as well as closing out such sites, county foresters ensure that protected areas, set-asides, and buffer zones are implemented according to the prescription. Notes from visits to active sites were reviewed, as were harvest close-out checklists.</p> <p>HCVs are monitored regularly, which was verified through document review and interviews with county staff.</p>
<p>8.2.d.1. Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	<p>C</p>	<p>In addition to regular monitoring of active harvests and close-out, BMP monitoring for water quality, soil disturbance monitoring, and vernal pond monitoring occurs. Examples of timber sale inspection reports and checklists for sites visited were reviewed.</p>
<p>8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	<p>C</p>	<p>DNR requires annual work plans for each county. These annual plans routinely include information on the system of forest roads. <i>Wisconsin’s Forestry Best Management Practices for Water Quality</i> includes the need for inspection at regular intervals for active roads and inspection of inactive roads. County staff interviewed indicated that their regular presence in the forest is an important mechanism for monitoring road conditions. Any problems noted by staff are promptly reported to the county administrator.</p>
<p>8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and</p>	<p>C</p>	<p>With county board meetings being open to the public and most documents available for public review, the county administrators are continually aware of relevant socioeconomic issues. They often receive stakeholder comments and respond to those comments. Individual county comprehensive land use plans, as well as the WCFA website, contain monitoring information.</p>

local purchasing opportunities (see Indicator 4.1.e).		
8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.	C	Meeting minutes with the public and Citizen Advisory Councils serve as a record of stakeholder interaction.
8.2.d.5. Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	Communication with tribal representatives is ongoing, assuring that any opportunities for joint monitoring of cultural sites are made available to tribes.
8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	Quarterly and annual accomplishment reports show progress throughout the year for various work goals (timber sale establishment, reforestation, etc.). Timber sale inspections constitute monitoring at harvest sale level.
<b>C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</b>	C	
8.3.a. When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	County forests use a trip ticket system for tracking FSC-certified products. Tickets have three parts: (1) when a load leaves the landing, one part is deposited in a lockbox on site.; (2) when delivered to the mill, a second ticket is maintained by the mill; and (3) and the third is retained by the contractor, Part (2) is returned to the county from the mill along with mill weight or tally. See COC indicators for FMEs conformance table.
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See Indicator 8.3.a above and COC indicators for FMEs conformance table.
<b>C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b>	C	-
<b>8.4.a</b> The forest owner or manager monitors and documents the degree to which the objectives stated in the	C	Annual work plans detail current activities to be carried out, while annual reports include a review of implemented activities. AWP are based on

<p>management plan are being fulfilled, as well as significant deviations from the plan.</p>		<p>management objectives detailed in the comprehensive land use plans and field data available in WisFIRS for classified stands. Any stands that have not been harvested are included as part of the next year’s annual allowable harvest or delayed until the stands are ready for harvest.</p>
<p><b>8.4.b</b> Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.</p>	<p>C</p>	<p>In 2024, significant deviations from management plans or guidelines were not reported. Each county’s comprehensive land use plan references monitoring and monitoring results.</p>
<p><b>C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</b></p>	<p>C</p>	<p>-</p>
<p><b>8.5.a</b> While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.</p>	<p>C</p>	<p>Annual reports and work plans present summaries of monitoring and are usually available on county web sites, or by request in offices. The public also is welcome to visit each county forest administrator’s office and request monitoring information. Additional monitoring information is available through WCFA.</p>
<p><b>P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p>		

- a) **Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance**
- b) **Forest areas that are in or contain rare, threatened or endangered ecosystems**
- c) **Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)**
- d) **Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).**

**Examples of forest areas that *may have* high conservation value attributes include, but are not limited to:**

Central Hardwoods:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >160 years old (a)
- Municipal watersheds –headwaters, reservoirs (c)
- Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)
- Intact forest blocks in an agriculturally dominated landscape (refugia) (a)
- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens (c)



- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund’s Forest Communities of Highest Conservation Concern (b)

*Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.*

*In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.*

*Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.*

*Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.*

*Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.*

<p><b>C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</b></p>	<p>C</p>	<p>-</p>
<p><b>9.1.a</b> The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator</p>	<p>C</p>	<p>FME consults various WDNR sources, such as NHI data and plant community mapping information. FME utilizes the experience and expertise of WDNR staff on the presence of RTE species and communities (e.g., State Natural Areas). The <i>WDNR Timber Sale Handbook</i> contains codes that are used to denote community types that qualify as HCVF. In cooperation with County administrators, DNR maintain spreadsheets with all HCVs by the six types per county. WDNR maintains a crosswalk that compares state-level terminology to HCV types.</p>

6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.		
<b>9.1.b</b> In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.	C	The HCVF assessment is conducted in consultation with Wisconsin DNR. In that assessment, many experts, community members, and specialists are consulted during the process. Records are included in management plans, annual work plans, and county meeting minutes.
<b>9.1.c</b> A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	This is available in the comprehensive land use plans for the counties that were visited.
<b>C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</b>	C	-
<b>9.2.a</b> The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.	C	Wisconsin DNR and external stakeholders are consulted to determine HCVF locations and their attributes. Records are included in management plans, annual work plans, and county meeting minutes.
<b>9.2.b</b> On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	C	County forest management planning documents regarding HCVF classification are open to public review through public meetings, county websites, and the Citizen Advisory Committee. Records are included in management plans, annual work plans, and county meeting minutes.
<b>C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included</b>	C	-

<b>in the publicly available management plan summary.</b>		
<b>9.3.a</b> The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.	C	Each HCVF is identified in the comprehensive land use plan and a written description along with management objectives is provided.
<b>9.3.b</b> All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	C	The counties work with Wisconsin DNR to determine and to apply the appropriate management activities that should occur in each HCVF. These include methods to protect species habitat characteristics (e.g., nest sites) or to maintain rare habitats, such as by burning, as described in the comprehensive land use plan and annual work plans.
<b>9.3.c</b> If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	NA	No HCVs that cross ownership boundaries were observed or reported in the 2024 audit.
<b>C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</b>	C	
9.4.a. The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	Periodic reconnaissance is conducted updating and targeted monitoring visits to some HCVFs each year as needed. HCV areas mostly undergo passive management. Interviews with staff indicate that these are visited periodically to ensure that there is little to no visible anthropogenic disturbance. For example, Gobbler Lake State Natural Area is annually surveyed for invasive species. HCVs within harvest units are primarily in sensitive areas that are identified during pre-harvest reconnaissance and

		monitored during post-harvest close-out evaluations to ensure effective protection measures.
9.4.b. When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	According to FME staff and external stakeholders, no increasing risks to HCVs have been detected.
<p><b>P10 Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</b></p> <p>This principle is not applicable for the FME.</p>		

### Appendix 5 – Chain of Custody Indicators for FMEs Conformance Table

REQUIREMENT	C/NC/NA
<b>1. Quality Management</b>	
1.1 The FME shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<p><b>Evidence 1.1:</b> As confirmed through review of COC procedures (e.g., Chapter 90 of Timber Sale Handbook), interviews with staff, the certificate manager is Chain of Custody Administrator with responsibility and authority for the FME’s conformance with the requirements of this standard. COC information is included on the organization’s certification webpage:  <a href="https://dnr.wisconsin.gov/topic/timbersales/certification">https://dnr.wisconsin.gov/topic/timbersales/certification</a>.</p>	
1.2 A system shall be implemented to track and trace all products that are sold with an FSC Claim from the <i>forest of origin</i> to the <i>forest gate(s)</i> . When legally required, and for group and multiple FMU certificates, this system shall also be documented. <i>The forest of origin should be the smallest reportable manageable unit, such as a tax parcel. It shall never be larger than a Forest Management Unit (FMU).</i> <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA, FME does not sell any products with an FSC claim
<p><b>Evidence 1.2:</b> Confirmed via review of COC procedures and sales documentation reviewed in 2.3.</p>	
1.3 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<p><b>Evidence 1.3:</b> This FME’s sale records were presented and reviewed. Contracts are the main sales document and all claims are listed on the FME’s <a href="#">website</a>. Contracts were reviewed for all timber sales visited. Records of FSC-related CoC activities are kept for at least 5 years, per review of records and interviews with FME staff. Log load tickets were examined.</p>	

1.4 The FME shall define its <i>forest gate(s)</i> (check all that apply):	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<input checked="" type="checkbox"/> <b>Stump</b> <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs <u>upon</u> harvest.</i>	
<input type="checkbox"/> <b>On-site concentration yard</b> <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i>	
<input type="checkbox"/> <b>Off-site Mill/ Log Yard/ Port</b> <i>Transfer of ownership occurs when certified-product is unloaded or paid for at purchaser's facility or a facility under the purchaser's control.</i>	
<input type="checkbox"/> <b>Auction house/ Brokerage</b> <i>Transfer of ownership occurs at a government-run or private auction house/ brokerage.</i>	
<input checked="" type="checkbox"/> <b>Lump-sum sale/ Per Unit/ Pre-Paid Agreement</b> <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for <u>before</u> harvesting begins. Similar to a per-unit sale.</i>	
<input type="checkbox"/> <b>Log landing</b> <i>Transfer of ownership of certified-product occurs at landing/yarding areas.</i>	
<input type="checkbox"/> <b>Other</b> (Please describe):	
1.5 The FME shall have sufficient control over its <i>forest gate(s)</i> to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA, FME does not sell any products with an FSC claim
<b>Evidence 1.4/1.5:</b> The legal transfer point is defined within each timber sale contract. For field-scaled sales, specification that logs cannot be transferred prior to scaling is included in specific language. Transfer of ownership in those cases occurs either <u>upon</u> scaling or approval from county forest staff.	
1.6 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the <i>forest gate(s)</i> without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills, on-site processing of chips/biomass or primary processing of Non-Timber Forest Products (NTFPs) under the FME's control (e.g., latex, rattan, maple syrup, etc.) originating from the FMU under evaluation.</i>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
<b>Evidence 1.6:</b> No processing occurs prior to legal transfer of ownership as confirmed via field observation and review of timber sales documentation.	
1.7 The FME has supported transaction verification conducted by SCS and Assurance Services International (ASI) by providing samples of FSC transaction data as requested by SCS. <i>NOTE: Pricing information is not within the scope of transaction verification data disclosure.</i>	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA, no verification requested
1.8 The FME shall support fiber testing by surrendering samples and specimens of materials and information about species composition and the location where the sample originated for verification, as requested by its certification body, ASI or FSC.	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA, no verification requested
<b>Evidence 1.7/1.8:</b> This has not been requested but WI DNR would comply with such requirements as confirmed with CoC administrator.	
<b>2. Product Control, Sales and Delivery</b>	

<p>2.1. Products from the certified forest area shall be identifiable as certified at the <i>forest gate(s)</i>.</p>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> NA, FME does not sell any products with an FSC claim</p>
<p><b>Evidence 2.1:</b> A variety of contracts were presented and reviewed for all counties sampled. These documents include the identification of these products as certified (FSC 100%) or refer the reader to the FME’s website with all certificate information (including certificate codes and claims). Contracts were presented and reviewed for all sites examined during the audit; see Site Notes for a listing of those contracts reviewed.                  Most harvested timber is transferred upon severance from the stump (stumpage sales) or prior to harvest (lump-sum sales). Haul tickets may be used in stumpage sales to track harvested materials once they leave the site, but ownership remains with the buyer upon ownership transfer. In lump-sum sales, the buyer is responsible for any COC requirements. For field-scaled sales, in which logs are scaled at the landing prior to transport, county and/or DNR staff scale each log and mark it with paint. This lets the buyer know that the item is approved to transport.</p>	
<p>2.2 Information about all products sold shall be compiled and documented for all FMUs in the scope of certification, including:</p> <ol style="list-style-type: none"> <li>1) Common and scientific species name;</li> <li>2) Product name or description;</li> <li>3) Volume (or quantity) of product;</li> <li>4) Information to trace the material to the source of origin harvest block;</li> <li>5) Harvest date;</li> <li>6) If basic processing activities take place in the forest, the date and volume/quantity produced; and</li> <li>7) Whether or not the material was sold with an FSC Claim.</li> </ol>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC</p>
<p><b>Evidence 2.2:</b> County staff tally and track harvest timber volumes. Information is entered into WisFIRS for comparison of pre-harvest and post-harvest volume information. Scale tickets are retained for each load.</p>	
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ol style="list-style-type: none"> <li>a) name and contact details of the FME;</li> <li>b) information to identify the customer, such as their name and address;</li> <li>c) date when the document was issued;</li> <li>d) product name or description, including common and scientific species name(s);</li> <li>e) quantity of products sold;</li> <li>f) the FME’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code;</li> <li>g) clear indication of the FSC claim for each product item or the total products as follows:                         <ol style="list-style-type: none"> <li>i. the claim “FSC 100%” for products from FSC 100% product groups; or</li> <li>ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups.</li> </ol> </li> </ol>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> NA, FME does not sell any products with an FSC claim</p>
<p>2.4 If the sales documentation issued by the FME is not included with the shipment of the product and this information is relevant for the customer to identify the product as being FSC certified, the related delivery</p>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC</p>

<p>documentation has included the same information as required in indicator 2.3 and a reference linking it to the sales documentation.  <b>Note: 2.3 and 2.4 are based on FSC-STD-40-004 V3-0 Clauses 5.1 and 5.3</b></p>	<p><input type="checkbox"/> NA, delivery documentation not required or FME is not responsible for issuing delivery documentation  <input type="checkbox"/> NA, FME does not sell any products with an FSC claim</p>
<p><b>Evidence 2.3/2.4:</b> A variety of timber sale contracts, trip tickets, wood settlement sheets and a timber harvest summary spreadsheet were presented and reviewed and include the volume of products sold.                  A variety of timber sale contracts were presented and reviewed for each site described in section 2.1 (see Site Notes). Current county forest timber sale contracts and haul tickets are maintained by county forest administrators. Whenever changes are made relative to forest certification information, the WCFP manager is consulted. Contracts contain the correct certificate code and FSC claim, as well as elements a)-e). Samples of timber sale contracts and load tickets were examined. Load tickets examined have elements a)-g) of 2.3 as stated above.</p>	
<p>2.5 If the FME is unable to include the FSC claim and/or certificate code in sales or delivery documents, the required information has been provided to the customer through supplementary documentation (e.g. supplementary letters). In this case, the FME has obtained permission from SCS to implement supplementary documentation in accordance with the following criteria:</p> <ol style="list-style-type: none"> <li>a. there shall exist clear information linking the supplementary documentation to the sales or delivery documents;</li> <li>b. there is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation; and</li> <li>c. where the sales documents contain multiple products with different FSC claims, each product shall be cross-referenced to the associated FSC claim provided in the supplementary documentation.</li> </ol>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> NA, all information included per 2.3 and/or 2.4</p>
<p><b>Evidence 2.5:</b> In 2023, the FME decided to include its certificate information on its webpage and include reference to that either in contracts or load tickets. Some counties have updated their templates to be consistent with this new method for communicating claims. For example, Washburn County’s contract includes the following text: <i>10. The area encompassed by this timber sale and forest products from this sale including logs or chips of all species are 3rd party certified. Seller’s forest certification information and chain of custody can be found at:</i>  <a href="https://dnr.wisconsin.gov/topic/timbersales/certification">https://dnr.wisconsin.gov/topic/timbersales/certification</a>.</p>	
<p>2.6 The FME may identify products exclusively made of input materials from small or community producers by adding the following claim to sales documents: “From small or community forest producers.” This claim can be passed on along the supply chain by certificate holders.  <i>A forest management unit (FMU) or group of FMUs that meet(s) the small and low-intensity managed forest eligibility criteria (FSC-STD-1-003a) and addenda. A community FMU must comply with the tenure and management criteria defined in FSC-STD-40-004.</i></p>	<p><input type="checkbox"/> C  <input type="checkbox"/> NC  <input checked="" type="checkbox"/> NA, not a small or community producer; or does not wish to pass along this claim</p>
<p><b>Evidence 2.6:</b> FME does not make such claims.</p>	
<p><b>3. Labeling and Promotion</b></p>	

<input type="checkbox"/> NA – FME does not use/ intend to use trademarks and no trademark uses were detected during the audit.	
<input type="checkbox"/> NA – <b>CW/FM certificates are not allowed to use FSC trademarks and no trademark uses were detected during the audit</b> (Note: it is a Major nonconformity to 3.1 if CW/FM certificates are found to be using trademarks).	
3.1 The FME shall adhere to relevant trademark use requirements of FSC-STD-50-001 described in the <i>SCS Trademark Annex for FMEs</i> .	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<b>Evidence 3.1:</b> Refer to evidence and findings cited in applicable trademark checklist(s) cited below. <input type="checkbox"/> FSC trademark use was detected for a CW/FM certificate as described in Major CAR for 3.1, FSC-STD-30-010, Annex 3, 1.2, and FSC-STD-50-001, 2.1e and 11.2: See Trademark Checklist in this Audit report.	
<b>4. Outsourcing</b>	
<input checked="" type="checkbox"/> NA – FME does not outsource any COC-related activities, as confirmed via interviews, sales documentation, and field observation.	
<input type="checkbox"/> NA – FME outsources low-risk activities such as transport and harvesting, as confirmed via interviews, sales documentation, and field observation.	
4.1 The FME shall provide the names and contact details of all outsourced service providers.	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
4.2 The FME shall have a control system for the outsourced process and agreement which ensures that: a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use; e) The outsourcer does not further outsource the material; and f) The outsourcer accepts the right of the certificate body to audit them.	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
<b>Evidence 4.1/4.2:</b> Logging and transportation of forest products are considered low risk and therefore these indicators are NA.	
<b>5. Training and/or Communication Strategies/</b>	
5.1 All relevant FME staff and outsourcers shall be trained in the FME’s COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME’s COC control system.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings or communications, the intended frequency of COC training (e.g., training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc.).	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<b>Evidence 5.1/5.2:</b> Interviewed County staff demonstrated awareness of when to use haul tickets and how to assign them to each sale. There is low risk for failure to pass COC claims on to buyers since information from 2.3 is included in contract templates. Informal training occurs at WCFA meetings to	



review certification issues, including COC. Operators showed proper understanding of how to use the trip ticket system and the purpose of the COC procedures.  
 Training on COC procedures occurs for new employees that learn timber sale administration. Since the current COC system is largely automated as information is included in contracts and load tickets by default, training records of training are minimal.

## Appendix 6 – Trademark Standard Conformance Table

<b>1. General Requirements for Use of the FSC Trademarks</b> (FSC “checkmark-and-tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)		
<b>Trademark uses reviewed:</b>		
Trademark Application (on-product/promotional)	Case Approval #, or Email (include approver name & date), or other appropriate documentation	Are all elements correct? (e.g., trademark symbol, color scheme, size, etc.) If not, describe in Nonconformities below.
Website	<ul style="list-style-type: none"> <li>▪ <a href="https://dnr.wisconsin.gov/topic/timbersales/countyforests">https://dnr.wisconsin.gov/topic/timbersales/countyforests</a></li> <li>▪ <a href="https://forestcountywi.com/forestry">https://forestcountywi.com/forestry</a></li> </ul>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
<input type="checkbox"/> All known uses reviewed. <input checked="" type="checkbox"/> Sample reviewed. Rationale that sample choice is sufficient to confirm requirements are met: <b>Website was searched for “FSC” and “Forest Stewardship Council” terms, and the Certificate “landing page” was examined for each county.</b> <input type="checkbox"/> Trademark uses detected include those grandfathered in under prior FSC trademark rules (e.g., FSC-TMK-50-201). Place the initials “GF” by the specific Trademark Applications above. <i>Note: This only applies to printed items or physical promotional materials (e.g., hats, load tickets) in stock. New printings, items, and websites must be updated per FSC-STD-50-001 requirements. If the organization only has GF uses and no new uses, the rest of this checklist is NA.</i>		
<b>1.2 Trademark License Agreement and valid certificate</b> In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. <i>Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i>		Maintained on file by SCS Main Office
<b>Evidence 1.2:</b> Maintained on file by SCS Main Office.		
<b>1.6 Product Group List</b> The products intended to be labeled or promoted as FSC certified have been included in the organization’s certified product group list.		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS
<b>Evidence 1.6:</b> <input checked="" type="checkbox"/> Refer to Product Groups List in Public Summary Report; <input type="checkbox"/> The following nonconformance(s) were detected in Product Groups:                   ; or <input type="checkbox"/> Refer to OBS related to Product Groups:		
<b>1.3 Trademark License Code</b>		<input checked="" type="checkbox"/> C

<p>The FSC trademark license code assigned by FSC to the organization accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</p>	<p><input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS</p>
<p><b>1.4 Trademark Symbol</b> The FSC logo and the ‘Forests For All Forever’ marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to ‘FSC’ and ‘Forest Stewardship Council’ at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). <i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i></p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, one or more of noted exceptions applies</p>
<p><b>2.1 Restrictions on using FSC trademarks</b> The organization <b>has not used</b> the FSC trademarks in the following ways: a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the organization, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS</p>
<p><b>2.2 Translations</b> The name ‘Forest Stewardship Council’ has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)</p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, no translations</p>
<p><b>Evidence 1.3, 1.4, 2.1, and 2.2:</b> <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected, <input type="checkbox"/> Refer to OBS:</p>	
<p><b>Sections 8 and 9 Graphic Rules</b> The organization has only used FSC logos that conform to the standard requirements governing: ● color and font (8.1-8.3); ● format and size (8.4-8.9); ● label placement (8.10); and ● ‘Forests For All Forever’ marks (9.1-9.7).</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS</p>
<p><b>1.5 Trademark Use Approval</b> The organization has submitted all intended uses of the FSC trademarks to SCS for approval. OR The organization has <b>an approved trademark use management system</b> in place. (If the organization has a trademark use management system, complete Annex A.)</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS</p>
<p><b>4.6</b> FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS</p>

	<input type="checkbox"/> NA, trademarks no used for segregation marks
<b>Evidence Graphic Rules, 1.5, and 4.6:</b> <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above;	
<input type="checkbox"/> The following nonconformance(s) were detected ; or	
<input type="checkbox"/> Refer to OBS:	

**2. On-Product Use of FSC Trademarks**  
 NA, no use of on-product trademarks (*on-product checklist may be deleted*)

**3. Promotional Use of FSC Trademarks**  
 NA, no use of promotional trademarks (*promotional checklist may be deleted*)

<p><b>6.1 Catalogues, Brochures, and Websites</b>                  When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:</p> <ul style="list-style-type: none"> <li>It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc.</li> <li>If both FSC-certified and uncertified products are listed then a text such as “Look for our FSC®-certified products” shall be used next to the promotional elements and the FSC-certified products shall be clearly identified.</li> <li>If some or all of the products are available as FSC certified on request only, this is be clearly stated.</li> </ul>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, not using trademarks in catalogues/ brochures/websites/
<p><b>6.2 Sales and Delivery Documents</b>                  When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: “Only the products that are identified as such on this document are FSC certified”.  <i>NOTE: Use of the FSC claim and certificate code on the invoices does not qualify as FSC trademark use.</i></p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not using trademarks on templates for FSC & non-FSC products
<p><b>6.3 Promotional Items</b>                  All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not labeling promotional items
<p><b>6.5 Trade Fairs</b>                  When the FSC trademarks are used for promotion at trade fairs, the organization has:</p> <ol style="list-style-type: none"> <li>clearly marked which products are FSC certified, or</li> <li>add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed.</li> </ol> <p><i>NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.</i></p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not using trademarks at trade fairs
<p><b>Section 6.6 and 6.7 Investment/Financial Claims</b>                  6.6 When investment companies or others are making financial claims based on the organization’s FSC certified operations, the organization has taken full responsibility for the use of the FSC trademarks.                  6.7 Any such claims have been accompanied by the disclaimer, “FSC is not responsible for and does not endorse any financial claims on returns on investments.”</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not making financial claims about FSC status

<p><b>7.1 and 7.2 Other Forestry Certification Scheme Logos</b>                  The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.</p>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/ OBS  <input type="checkbox"/> NA, not using other scheme logos</p>
<p><b>7.3 Business Cards</b>                  The FSC trademarks have not used on business cards to promote the organization’s certification.                  The FSC logo or ‘Forests For All Forever’ marks are not used on business cards for promotion. A text reference to the organization’s FSC certification, with license code, is allowed, for example “We are FSC® certified (FSC® C#####)” or “We sell FSC®-certified products (FSC® C#####)”.</p>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/ OBS  <input type="checkbox"/> NA, approval granted prior to July 1, 2011</p>
<p><b>7.4 Promotion with CB Logo</b>                  FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.</p>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/ OBS</p>
<p><b>Evidence 6.1-6.3, 6.5-6.7, 7.1-7.4:</b> <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above;  <input type="checkbox"/> The following nonconformance(s) were detected ; or  <input type="checkbox"/> Refer to OBS:</p>	

- Annex A: Trademark use management system**
- NA, not using a trademark management system (*Annex A checklist may be deleted*)
- Annex B, Additional trademark rules for group FM certificate holders**
- NA, not a group FM certificate or group does not use FSC trademarks (*Annex B checklist may be deleted*)

**Appendix 7 – Group Management Program**

This is not a group certificate, so this appendix is not applicable.

**Appendix 8 – Additional Checklists**

No additional checklists, so this appendix is not applicable.