

**Forest Management and Stump-to-Forest Gate Chain-of-Custody
Certification Evaluation Report for the:**

Wisconsin Department of Natural Resources

**Conducted under auspices of the SCS Forest Conservation Program
SCS is an FSC Accredited Certification Body**

**CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00070N**

Submitted to:

Wisconsin Department of Natural Resources

Lead Author: Dr. Robert Hrubes

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Date of Report: December 16, 2008

Updated : October, 2009 (See section 6.1)

Certified: January 13, 2009

By:

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Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the SCS website (www.scs-certified.com) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of the Wisconsin Department of Natural Resources.

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Wisconsin Department of Natural Resources to conduct a certification evaluation of its forest estate. Under the FSC/SCS certification system, forest management operations meeting international standards of forest stewardship can be certified as “well managed”, thereby enabling use of the FSC endorsement and logo in the marketplace.

From September 15 – 19, 2008, an interdisciplinary team of six (6) natural resource specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 5 day field and office audit of the subject property as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team determined conformance to the 56 FSC Criteria in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to Wisconsin Department of Natural Resources, for the management of its 1.5 million acre forest estate. In the event that a certificate is awarded Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

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SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION

1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	Wisconsin Department of Natural Resources
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Certificate Number	SCS-FM/COC-00070N
Certificate/Expiration Date	January 13 th , 2009 – January 13 th , 2014
Certificate Type	<i>single forest management certificate with forest gate chain-of-custody</i>
Forest zone	<i>temperate</i>
Total forest area in scope of certificate:	1.5 million acres. All lands are state managed, including 513,000 acres of state forests and 984,157 acres of Land Division properties.
Chemical pesticides used	<i>List of active ingredients: tetramethrin and phenothrin, glyphosate, 2-4-d, dimethylamine ester, imazamox, ammonium sulfate, 2-4-d butoxyethanol ester, s-metolachor r-enantiomer, triclopyr, imazapyr, piperohyl butoxide and bendiocarb, terbuthylazine and haloxyfop, aminopyralid, imazapic, sodium chloride, carbaryl, tebuthiuron, picloram, clopyralid</i>
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	The forest is a mosaic of conifer and hardwood cover types, classified by species dominance; e.g., white pine, spruce-fir, northern hardwoods, central hardwoods, oak, aspen, planted pine stands
List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products	Round wood, pulpwood, sawtimber, firewood and other non-timber forest products

Conversion Table English Units to Metric Units

Length Conversion Factors

To convert from	to	multiply by
mile (US Statute)	kilometer (km)	1.609347
foot (ft)	meter (m)	0.3048
yard (yd)	meter (m)	0.9144

Area Conversion Factors

To convert from	to	multiply by
square foot (sq ft)	square meter (sq m)	0.09290304
acre (ac)	hectare (ha)	0.4047

Volume Conversion Factors

Volume

To convert from	to	multiply by
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
gallon (gal)	liter	4.546
1 acre	= 0.404686 hectares	
1,000 acres	= 404.686 hectares	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	
1,000 cubic feet	= 28.317 cubic meters	

Breast height = 1.4 meters, or 4 1/2 feet, above ground level

Although 1,000 board feet is theoretically equivalent to 2.36 cubic meters, this is true only when a board foot is actually a piece of wood with a volume 1/12 of cubic foot. The conversion given here, 3.48 cubic meters, is based on the cubic volume of a log 16 feet long and 15 inches in diameter inside bark at the small end.

1.2.1 Environmental Context

This report addresses the five-year reassessment of the Wisconsin DNR pursuant to the FSC guidelines for forest management certification assessments as well as the forest management certificate awarded by Scientific Certification Systems (SCS-FM/COC-00070N). The Wisconsin Department of Natural Resources was first awarded certification for the State Forests in May 2003. Annual audits were completed for the State Forests in each subsequent year from 2003 – 2007. During the 2007 annual audit of the State Forests, a preliminary assessment was completed to address the proposed expanded scope of the certificate. The proposed expansion includes additional lands administered by the Division of Land, including state parks, wildlife management areas, and scientific and natural areas. The proposal is to have all state-managed lands achieve certification. A public summary of the initial evaluation and subsequent annual audits is available on the SCS website (www.scscecertified.com).

This report includes the expansion of the scope of the certificate to include additional lands managed by the Wisconsin DNR. The expanded scope of the certificate includes the state forests, state parks, and scientific and natural areas. The assessment was conducted with the applicable FSC regional standard, the Lake States-Central Hardwoods Region (USA) Regional Forest Stewardship Standard Version 3.0.

WDNR land included in the project includes approximately 1.5 million acres as shown in the following table:

Wisconsin DNR Lands – based on a May 2008 DNR real estate snapshot (acres).

	Fee and Leased Land	Outside Certification Scope	Certified Land
State Forests (Certified in 2004)	553,736	36,002	517,734
"Other" DNR Land (Parks, Wildlife Areas, Etc.)	1,060,825	94,597	966,228
All DNR Land	1,614,561	130,599	1,483,962

Categories included in the forest certification assessment include:

- Northern and Southern State Forests
- State Parks
- State Recreation Trails
- State Wildlife Areas
- State Fisheries Areas
- State Natural Areas
- Natural Resource Protection and Management Areas
- Lower Wisconsin Riverway
- State Wild Rivers
- State Owned Islands
- Stewardship Demonstration Forests

At the time of the last annual audit (July 2007), there were two (2) open Corrective Action Requests (CARs) related to monitoring reports and woody debris guidelines. The last annual audit focused on reviewing the open CARs and included a pre-assessment to address the proposed expanded scope of the certificate. The field component of the pre-assessment took place on July 16-19, 2007. The pre-assessment was performed in conjunction with the 2007 annual surveillance audit of the Wisconsin State Forests FSC-endorsed forest management certificate (SCS-FM/COC-00070N).

The Wisconsin DNR has responsibilities for managing 517,000 acres of state forests that were first certified in 2003. The DNR believes that there has been sufficient benefits accrued from participation in forest certification to warrant expansion of the scope of their certificate to include 966,000 acres of properties managed by its Land Division. The benefits of certification are perceived to include strengthened marketability of products and retention of manufacturers who are actively seeking certified forest products. The assessment and auditing process also provide beneficial opportunities to identify potential challenges and solve problems that results in continual performance improvements. The social benefits of certification include improved public support and reduced controversy related to land management activities.

While 84 percent of Wisconsin's forests are hardwood types, state managed lands also offer opportunities to maintain or restore conifer forest communities. There are also areas of important barrens, savanna, wetland and prairie communities that play an important role in maintaining favorable conditions for many of the 1,800 native plant species and 657 vertebrate species found in the state. The State Natural Area Program has grown to 590 sites encompassing more than 150,000 acres of land and water. The majority of State Natural Areas (354 sites) are located on DNR lands. State Natural Areas protect outstanding examples of native natural communities, significant geological formations, and archaeological sites. They harbor natural features essentially unaltered by human-caused disturbances or that have substantially recovered from disturbance over time. More than 90% of the plants and 75% of the animals on Wisconsin's list of endangered or threatened species are found on habitats protected within State Natural Areas.

1.2.2 Socioeconomic Context

The scope of the certificate includes state forests managed for diverse forest-based uses as well as Land Division properties that provide significant socioeconomic benefit. These property types include: State Parks, Wildlife Areas, Recreation Areas and Trails, Fisheries Areas and Natural Areas, Natural Resource Protection and Management Areas, Lower Wisconsin Riverway, State Wild Rivers, State Owned Islands and Stewardship Demonstration Forests. Wisconsin households spend over \$5.5 billion per year on goods and services associated with forest-based recreation.

Timber production and tourism contribute significantly to the state's overall economy. In Wisconsin, more than 1,850 wood-using companies produce nearly 20 billion dollars of forest products every year. More than 300,000 Wisconsin jobs rely on the forest products industry. Recreation is one of the primary uses of the State Forests with over two million visitors annually on the Northern Highland/American Legion State Forest alone. Hunting, hiking, boating,

fishing, camping, cross country skiing, and snowmobiling are examples of popular recreational activities that occur on state lands.

Wisconsin is expecting a 6.8% increase in the state's adult population by 2025. This population growth is expected to increase demands for recreation opportunities and pressures on competing land uses. The age of Wisconsin residents is expected to shift in coming years with 20% of the population being over the age of 65 by 2030. This demographic trend is anticipated to have impacts on land use decisions. Wisconsin is also becoming more culturally diverse and more urbanized.

1.3 Forest Management Enterprise

1.3.1 Land Use

In 1967, the Wisconsin Legislature created the Department of Natural Resources. The Department coordinates the preservation, protection and regulation of the natural environment for the benefit of the people of this state and its visitors. Included in its responsibilities are water and air quality protection, water supply regulations, solid and hazardous waste management, contamination cleanup, protecting biodiversity, fish and wildlife management, forest management and protection, providing parks and outdoor recreation opportunities, lake management, wetland, shoreland and floodplain protection, and law enforcement.

The Department also coordinates federal, state and local aid programs of the U.S. Fish and Wildlife Service, the U.S. Forest Service, the Environmental Protection Agency and other federal agencies and administers federal funds available for outdoor recreation, thereby taking a lead role in planning state outdoor recreation facilities. It administers state aid programs for local outdoor recreation and pollution abatement.

The Department is a cabinet agency, with the Secretary and a citizen Board appointed by the Governor and confirmed by the Senate. The Secretary is the Department's chief executive officer, and the seven-member citizen Natural Resources Board directs and supervises the Department.

The Wisconsin Natural Resources Board sets policy for the Department of Natural Resources and exercises authority and responsibility in accordance with governing statutory provisions. Chapter 15 of the Wisconsin Statutes delineates the formal duties of the seven-member board. Board Members are appointed by the Governor with the advice and consent of the State Senate. Three members each must be selected from the northern and southern portions of the state and one member serves "at large."

The following regulations apply to state land management in Wisconsin and have relevancy to the certification assessment:

- Statutory authority to engage in forest certification (broadly interpreted): §§23.11, 28.01, 28.07, and 77.80
- DNR Manual Codes and Handbooks
- Wisconsin Pesticide Law (Chapter 94, WI Statutes)

- Use of Pesticides on Land and Water Areas of the State of Wisconsin (WI Administrative Code, Chapter NR 80)
- Wild Animals and Plants Law (Chapter 29, WI Statutes) and WI Administrative Code NR 10
- Wisconsin Water Law: UW Booklet
- Wisconsin Groundwater Law (Chapter 160, WI Statutes)
- Navigable Waters (Chapter 30, WI Statutes)
- Water Quality Standards for Wetlands (Chapter NR 103, WI Administrative Code)
- Wisconsin Shoreland Management Program (Chapter NR 115, WI Administrative Code)
- Endangered and Threatened Species (Chapter NR 27, WI Administrative Code)
- Wisconsin Historic Preservation Laws

List of treaties and international agreements at the federal level that are relevant to the operation:

- Clean Water Act (Section 404 wetland protection)
- Occupational Safety and Health Act
- National Historic Preservation Act
- Archaeological and Historic Preservation Act
- Americans with Disabilities Act
- U.S. ratified treaties, including CITES
- Endangered Resources Laws

1.3.2 Land Outside Scope of Certification

The following DNR properties (about 130,000 acres) are explicitly excluded from the certification project and the reason for exclusion is included in parenthesis:

- Agricultural fields (intensive non-forest use)
- Stream Bank Protection Areas (eased lands not under DNR management)
- Forest Legacy Easements (eased lands not under DNR management)
- States Fish Hatcheries and Rearing Ponds (intensive fish rearing sites, only)
- State Forest Nurseries (intensive non-forest use)
- Nonpoint Pollution Control Easements (eased lands not under DNR management)
- Poynette Game Farm and McKenzie Environmental Center (intensive non-forest use)
- Boat Access Sites (intensive non-forest use)
- Fire Tower Sites (intensive non-forest use)
- Radio Tower Sites (intensive non-forest use)
- Ranger Stations (intensive non-forest use)
- Administrative Offices and Storage Buildings (intensive non-forest use)
- Meadow Valley Wildlife Area (Leased Federal lands)

DNR makes no claims that would indicate that these properties outside of the scope are FSC certified. Additionally as indicated in Section B.2.2, DNR has appropriate procedures in-place to ensure that only timber from lands within the scope of the certificate is sold as “FSC”.

1.4 Management Plan

1.4.1 Management Objectives

The WDNR uses a Property Master Planning process to determine how a property will be managed and developed. By administrative code the master plan is the controlling authority for all actions and uses on a property. The development of master plans is governed by Chapter 44 (Natural Resources) of the Wisconsin Administrative Code--the master planning rule. This rule defines master planning; sets forth its purposes, specifies the general planning process and the content of a master plan. This rule also establishes a uniform land management classification system to be applied in the master plan. NR 44.04(9) states; *A master plan establishes the authorized management and development on a property, and only those management and development activities identified in the master plan may be pursued by the department.* NR 44.04(11) further states; *When internal department guidelines and directives conflict with the provisions of a master plan, the master plan shall control.*

The master planning handbook supports and supplements NR 44 by providing additional guidance on master planning policies, process, required data, document content, planning team structure and function, and citizen involvement. Further, it is intended to aid achieving an appropriate level of consistency in plans across all Department programs. The handbook was developed by the Bureau of Facilities and Lands, Planning and Land Management Section, which has administrative responsibility for the Department's property planning program.

The purposes of the master plan and planning processes include the management of resources on Department properties in accordance to land use capabilities, consistent with the long-term protection and use of these resource, as required by NR 1.60(4). The plans also provide the basis for decision-making consistent with the Wisconsin Environmental Policy Act (WEPA). Plans integrate department programs and provide clear direction on management with a long-range vision and goals. Plans establish management objectives, priorities and prescriptions and provide an opportunity for interested persons and organizations to provide input. The plans also contribute to the budget process.

1.4.2 Forest Composition

The Department of Natural Resources adopted an ecological classification system to consistently organize its land-based ecological planning, management, and monitoring activities. This system divides the state into 16 ecologically similar regions, based on climate, soils, existing and pre-settlement vegetation, topography, types of aquatic features present, and other factors. They also have unique sets of conservation needs and opportunities. They differ in levels of biological productivity, habitat suitability for wildlife, presence of rare species and natural communities, and in many other ways that affect land use and management. The distribution and abundance of plants and animals across the state has been, and continues to be, determined by both natural factors and human-induced disturbance patterns. Historically, many species reached the edge of their range in a narrow band that runs from northwestern to southeastern Wisconsin. This narrow band, known as the "Tension" or "Transition" Zone, separates the northern forest (including the boreal forest) from the southern forest and prairies.

1.4.3 Silvicultural Systems

DNR has developed a Silviculture and Forest Aesthetics Handbook to guide management treatments on the major forest cover types in Wisconsin. The ecological characteristics and recommended silvicultural practices and systems for each cover type are described in sufficient detail to support operational planning. Additional silvicultural information can be obtained by referring to the list of publications at the end of each chapter. The Forest Aesthetics portion of the Handbook contains a compilation of management considerations and techniques that may be used to modify silvicultural practices in order to accomplish desired aesthetic management objectives. Typically, the silvicultural guidelines are written to encourage a stand containing the greatest quality and quantity of timber while recognizing the short term and long term impacts of silvicultural activities, and land management responsibilities. A stewardship ethic is fostered to encourage vigor within all developmental stages of forest stands, managed in an evenage or unevenage system. The guidance in the Handbook applies to all forest properties owned by the Wisconsin Department of Natural Resources. Department personnel and cooperating partners will follow the management alternatives outlined in this Handbook, unless the approved property management plan makes an exception, or in the judgment of the forester, a variance from these guidelines is warranted and can be documented to the satisfaction of the Department.

1.4.4 Organization and Scope

The Department is organized with a headquarters office in Madison, five regional offices and over 200 other field stations and offices. The central office staff assists the Secretary in developing policy and directing the implementation of Department programs in the regions, which carry out the field operations of the Department. Over 70% of the Department's personnel operate from five Regional Headquarter offices and from field stations throughout the state.

The Department is organized into programs and subprograms to facilitate the accomplishment of its mission. Seven divisions established in statutes -- Land, Forestry, Air and Waste, Enforcement and Science, Water, and Customer and Employee Services -- have primary responsibility for the Department's program.

The Land and Forestry Divisions have lead responsibilities for the lands included within the forest certification assessment. The Enforcement, Science, and Water Divisions also have roles and responsibilities related to state lands management.

The Land Division plans and directs activities that include developing and maintaining game and nongame wildlife populations; coordinating long-range programs of management and protection for endangered resources; and providing necessary acquisition, development and operations for statewide recreational and conservation activities within parks, southern forests, wildlife lands, scientific areas and natural areas.

The Forestry Division is responsible for the administration of the development and implementation of a balanced management and protection program for the state's forest resource.

1.4.5 Monitoring System

DNR has a multi-faceted monitoring system. There is also a citizen-based monitoring network in the state with support from a DNR grant program. The WDNR monitoring system includes monitoring Best Management Practices (BMPs), use of the Forest Recon Data System/WisFIRS, and the well-established Forest Inventory and Analysis Program (FIA). The WDNR is also beginning to implement a Sustainability Framework that is based upon Criteria and Indicators that will aid in monitoring land use conditions and changes in the state. A key component of the monitoring system is the process associated with master plans. Reports resulting from monitoring activities are publicly available. Monitoring and reporting is also completed for specific areas of interest including deer impacts, tree improvement, forest health, and climate change.

1.4.6 Estimate of Maximum Sustainable Yield

The Wisconsin DNR uses an area control method for calculating the Annual Allowable Timber Harvest. The system defines the number of acres that can be harvested each year, on a sustained basis, without depleting the resource over time. It is calculated based on inventoried forest data collected by field staff in combination with long range planning (e.g. Master Planning) considerations. A property's ecological, economic, and societal constraints are considered in this determination. The land manager uses this information to determine a predicted year of harvest for each stand of trees. The combination of these stands, and their associated treatments, represents the number of acres to be evaluated for harvest in a particular year. The annual allowable timber harvest is a long term monitoring figure. Yearly fluctuations are common due to changing conditions created by storms, insect & disease infestations; changing timber markets, fires, or backlogged workload.

Both Long Term harvest goals and Annual harvest goals are established through the planning procedure in the WisFIRS database. In calculating those figures local harvest constraints may be applied to fine-tune the rotation ages and thinning intervals. Early and late constraints (within silvicultural sideboards) also allow local managers to temper harvest peaks and valleys in scheduled timber sales.

The Long Term Harvest Goal in WisFIRS represents the annual allowable harvest for public lands in Wisconsin. It provides long-term annual harvest goals by forest type and harvest type, over a 15 year period. Any backlogged practices are apportioned out equally over the 15 years. Long-term timber sale monitoring compares timber sales established and deferred against this figure.

1.4.7 Estimated, Current and Projected Production

DNR is required to prepare a report specifying the total timber harvest (acres established to be used rather than cut acres) on each forested property for the previous biennium. The initial report was due on January 1, 2007 on a biennial reporting cycle with reports submitted to the Council on Forestry. The Council on Forestry prepares a report containing reasons for noncompliance and recommendations on methods of ensuring that the timber harvest is consistent with the established annual allowable timber harvest. The report is only required if

harvest is less than 90% or more than 110% of annual allowable timber harvest. The reports are prepared biannually and submitted to the Governor, DNR, and appropriate standing committees of legislature.

The most recent report indicates that the allowable harvest in the two-year period of 2005-2006 was 54,250 acres. During the 2005-2006 period 25,818 acres of timber sales were established. This level of harvest represents 69% of the allowable harvest on a total statewide ownership of 1.5 million acres.

On an annual basis, about 1 % of the land under DNR administration is actively managed each year according to a 2007 report to the Wisconsin Legislature. In the last three years, an average of 14,985 acres were established for harvest per year. Of this, two-thirds of the harvests occur on State Forests (which constitute 1/3 of the DNR land base). Reflecting a greater focus on non-timber objectives, other DNR land such as wildlife areas and state parks (with 2/3 of the land base) produce 1/3 of the average annual harvest acreage.

Of the area harvested over 70% of the management prescriptions are thinnings, which reduce the density of stems to accelerate growth of the remaining trees and vertical structural diversity within the stand harvested. Approximately 30 % of the stands actively managed each year are harvested using regeneration techniques. After harvest these stands are either replanted or regenerate naturally and will continue to grow and produce forests and wood products for future generations. These regenerating forests also provide important habitat for species associated with young forests such as the snowshoe hare and woodcock.

Harvested stands are either regenerated naturally or are planted with seedlings. The determination of which method to use is based on the ability of the site to regenerate naturally and the ability of the desired species to regenerate on a particular site. For example, if a site experiences hot and dry conditions planting may be the best alternative. This is most common for the pine species, especially jack pine.

Even-aged and uneven-aged management schemes are the harvest systems employed on Wisconsin DNR's land. Even-aged management includes clearcuts, clearcuts with reserves, seed tree methods, shelterwood cuttings, and intermediate thinnings. Uneven-aged management includes both individual and group selection techniques. Each of these systems and techniques are designed in conjunction with a particular tree species or community of trees. For example, uneven-aged single tree and group selection techniques are used in northern hardwoods, hemlock-hardwood, and swamp hardwood stands. In contrast, even-aged clearcuts are used in pine (red, white, and jack), paper birch, aspen, oak, northern hardwoods, scrub oak, aspen, fir-spruce, and black spruce stands. The selection of a management system and specific technique depends on many factors including tree composition, age of the stand, location, accessibility, and most importantly the long-term objectives for the stand under consideration.”

1.4.8 Chemical Pesticide Use

The WDNR has an established pesticide regulations outlining Department approval, use and reporting of chemicals for disease, pests, and management. The Department uses various methods for disease and pest control at its facilities and for land management. The DNR has prepared guidance on complying with the FSC policy regarding highly hazardous pesticides and received a derogation for the use of hexazinone.

Pesticides Used on Wisconsin DNR Lands (2007-2008)

Chemical Name	Active ingredients	Permitted by FSC
6-Pro	tetramethrin and phenothrin	x
Accord	Glyphosate	x
Amine 4 2,4-D weed killer	2-4-d, dimethylamine ester	x
Aquastar	Glyphosate	x
Beyond	imazamox	x
Buccaneer Plus	Glyphosate	x
Class Act NG	ammonium sulfate	x
Cornerstone Plus	Glyphosate	x
Credit Xtra	Glyphosate	x
Crossbow Herbicide	2-4-d butoxyethanol ester	x
Dual II	s-metolachor r-enantiomer	x
Element 3-A	triclopyr	x
Element 4	triclopyr	x
Escort	metasulfron methyl	x
Escort XP	metasulfron methyl	x
Garlon 3A	triclopyr	x
Garlon 4	triclopyr	x
Garlon 4 Herbicide	triclopyr	x
Garlon DA	triclopyr	x
Gly Star	Glyphosate	x
Glyphomax	Glyphosate	x
Glyphos Extra	Glyphosate	x
Glyphosate	Glyphosate	x
GlyPro	Glyphosate	x
Glystar	Glyphosate	x
Glystar Plus	Glyphosate	x
Habitat	imazapyr	x
Hornet	piperohyl butoxide and bendiocarb	x
Milestone	aminopyralid	x
Milestone VM	aminopyralid	x
Mirage Plus	Glyphosate	x
Plateau	imazapic	x
Quik Pro	Glyphosate	x
Raid Wasp Killer	imidcloprid	x
Rascal Plus	Glyphosate	x
Razor Pro	Glyphosate	x
Roundup	Glyphosate	x
Roundup PRO	Glyphosate	x
Roundup Ultra	Glyphosate	x

Roundup Ultra Max	Glyphosate	x
Salt	sodium chloride	x
Spike 80DF	tebuthiuron	x
Tahoe	triclopyr	x
Tahoe 4	triclopyr	x
Tahoe 4A	triclopyr	x
Tahoe 4E	triclopyr	x
Tordon K	picloram	x
Tordon RTU	picloram	x
Touchdown Herbicide	Glyphosate	x
Touchdown Total Pro	Glyphosate & imazapyr	x
Transline	clopyralid	x
Transline herbicide	clopyralid	x
Weedone Brand 638	2-4-d, butoxyethanol ester	x

2.0 GUIDELINES/STANDARDS EMPLOYED

As the applicant is located in Wisconsin, the certification evaluation that is the subject of this report was conducted against the duly-endorsed Lake States-Central Hardwoods Region Version 3.0 (Feb. 10, 2005). The standard is available at the FSC-US web site (www.fscus.org) or is available, upon request, from Scientific Certification Systems (www.scscertified.com).

3.0 THE CERTIFICATION ASSESSMENT PROCESS

3.1 Assessment Dates

The assessment was completed in September 2008 with the field assessment occurring from September 15 – 19, 2008.

Main Evaluation:

3.2 Assessment Team

Robert J. Hrubes, Ph.D., FSC Lead Auditor

Dr. Hrubes is a California registered professional forester (#2228) and forest economist with over 30 years of professional experience in both public and private forest management issues. He is presently Senior Vice-President of Scientific Certification Systems. In addition to serving as team leader for the Wisconsin state forestlands evaluation, Dr. Hrubes worked in collaboration with other SCS personnel to develop the programmatic protocol that guides all SCS Forest Conservation Program evaluations.

Dr. Hrubes has previously led numerous SCS Forest Conservation Program evaluations of North American public forests, industrial forest ownerships and non-industrial forests, as well as operations in Scandinavia, Chile, Japan, Malaysia, Australia and New Zealand.

Dr. Hrubes holds graduate degrees in forest economics, economics and resource systems management from the University of California-Berkeley and the University of Michigan. His

professional forestry degree (B.S.F. with double major in Outdoor Recreation) was awarded from Iowa State University. He was employed for 14 years, in a variety of positions ranging from research forester to operations research analyst to planning team leader, by the USDA Forest Service. Upon leaving federal service, he entered private consulting from 1988 to 2000. He has been Senior V.P. at SCS since February, 2000.

Michael Ferrucci, SFI Lead Auditor

Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 18 years. Its clients include private citizens, land trusts, municipalities, corporations, private water companies, and non-profit organizations. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies.

Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies.

Kathryn Fernholz, Audit Team Member; Forestry Specialist

Kathryn Fernholz is Executive Director of Dovetail Partners, a non-profit organization based in Minneapolis that works on issues related to sustainable forestry and responsible trade. Kathryn is a forester with training and experience in silviculture, forest management in the Lake States region, and private lands forestry. Kathryn has been working with family forest owners and related forest management interests since 1999. Her work has included projects throughout the Upper Midwest and has ranged from assisting with the development of forestry cooperatives and the growth and development of landowner associations to supporting a variety of family forest certification efforts. Kathryn has been a leader within the forestry community in the Upper Midwest through her service as Chair of the Minnesota Society of American Foresters and her appointment to the Minnesota Forest Resources Council. Kathryn is a member of the Advisory Board for the Blandin Foundation's Vital Forests/Vital Communities Initiative, and she is also a member of the Board of Directors for the Minnesota Environmental Partnership and the College of Food, Agricultural and Natural Resource Sciences Alumni Society. Kathryn has a B.S. in Forest Resources from the University of Minnesota, College of Natural Resources and also studied at the College of Saint Benedict in St. Joseph, MN and Sheldon Jackson College in Sitka, Alaska.

Bernie Hubbard, Audit Team Member; Forestry Specialist

Bernie Hubbard is currently serving as President of the Society of American Foresters. As a licensed forester with the state of Michigan, Bernie has over 40 years of forest management experience in the Lake States region. Bernie served as the State Forester and Assistant Chief of the Michigan Department of Natural Resources from 2002 to 2005 and as MDNR Upper Peninsula Forest Supervisor between 1998 and 2002. Prior to this, he spent 13 years as District Forest Supervisor for the MDNR Lake Superior State Forest. In 1995 Bernie led the development of a sustainable forest management planning process that was adopted by MDNR

as a model for forest resource planning. In addition, Bernie was involved in the establishment and growth of Eastern Upper Peninsula Partners in Ecosystem Management, a group of major landowners and natural resource managers in the Eastern Upper Peninsula to facilitate and compliment ecosystem management across all ownerships. Active in the Society of American Foresters on both the state and national level, Bernie was elected SAF fellow in 2002 and was presented the Outstanding Service to the Society award in 2000.

Gary Zimmer, Audit Team Member; Wildlife Biology Specialist

Gary Zimmer is the Western Great Lakes Regional Biologist for the Ruffed Grouse Society and resides in Laona, Wisconsin. Gary has extensive certification experience in Wisconsin having participated on the initial FSC and SFI main assessments for the Wisconsin County Forest Program and the DNR State Forests. In March of this year, Gary participated as an auditor in the FSC recertification assessment for the Menominee Tribe.

Gary joined the Ruffed Grouse Society in December of 2000 after 18 years with the US Forest Service, working as a District Biologist on the Lakewood/Laona Ranger District. He received his B.S. degree in wildlife management in 1976 and received a M.S. degree in natural resources in 1979 from the University of Wisconsin – Stevens Point. His M.S. thesis was entitled “The Status and Distribution of the Common Loon in Wisconsin”. An avid outdoorsman, Gary enjoys hunting, fishing, camping, outdoor photography and is a licensed bird bander. Gary is a Certified Wildlife Biologist and recently completed a two year term as Secretary/Treasurer for the Wisconsin Chapter of the Wildlife Society. Gary currently is the chairman of the Habitat Assessment and Management Committee for the Wisconsin Bird Conservation Initiative.

Gary has a significant background in forest management having worked throughout his career in planning and implementing a variety of wildlife and fish habitat projects. He has participated on a variety of forest management reviews in Wisconsin and has received numerous Special Achievement Awards throughout his career. Gary is especially proficient in the management of forest bird habitat both in his professional and private life.

JoAnn Hanowski, M.Sc., Audit Team Member; Biology/Ecology Specialist-

JoAnn M. Hanowski was a senior research fellow at the University of Minnesota-Duluth’s Natural Resources Research Institute. She has considerable expertise evaluating the effects of forest management on wildlife habitat, and is currently working on research projects involving the response of birds to various forest management practices in stream and seasonal pond buffers and the development of indicators of forest and water health and sustainability in Minnesota and across the Great Lakes. She was a member of the forest bird technical team for the original GEIS and participated on the wildlife technical team that wrote forest management guidelines for Minnesota. She is a participant in a 14-year project for monitoring avian populations on the Chequamegon National Forest. She is currently a member of the riparian science technical committee that is investigating the effectiveness of Minnesota’s current guidelines for forest management in riparian systems. She has published 64 peer-reviewed journal articles and over 75 reports in her 21 year tenure with the University of Minnesota. In 2005 JoAnn participated in the largest forest certification project ever conducted in the United States, the joint FSC/SFI certification of Minnesota’s state lands. In 2006 and 2006 JoAnn contributed regional ecological expertise to the annual surveillance audits of the MN DNR’s FSC and SFI certificates.

3.3 Assessment Process

The scope of the assessment included: document review, auditors spending time in the field and office, interviewing management personnel and, as appropriate, interacting with outside stakeholders. To enhance the efficiency and effectiveness of the assessment, the audit team was divided into two three-person teams that traveled to different sites. The use of two teams allowed the assessment to view more diverse and geographically dispersed field sites.

The audit teams inspected a variety of field sites to assess conformance with the Lakes States-Central Hardwoods FSC Regional Standard. During the assessment planning the Lead Auditor and the WDNR representative reviewed the range of field activities and formulated a sampling plan. The Lead Auditor and WDNR representatives first determined appropriate sample areas or geographic strata within which to sample field sites. The Lead Auditor then used randomized selection methods to select a subset of all available sales and assigned a priority number to each site. Wisconsin DNR staff members worked with the lead auditor to designate the final selection list from this prioritized list and final adjustments were made during the audit to ensure flexibility and allow for additional samples as needed. Local foresters assisted with scheduling appropriate field site visits in a manner that balances efficiency of travel routes, the priority number for sites, and factors designed to assure coverage of key issues under the certification requirements.

3.3.1 Itinerary

Field sites and schedule of site visits:

Day 1 – Opening meeting WDNR Offices in Madison

Participants:

Dave Birren, WI DNR, Land Division, Forest Certification Coordinator
Tom Boos, WI DNR, Forestry, Invasive Species
Alan Crossley, WI DNR, Wildlife Management, Public Lands Management Specialist
Kate Fitzgerald, WI DNR, Facilities and Land, Chief, Land Management Planning Section
Randy Hoffman, WI DNR, Endangered Resources, State Natural Areas Ecologist
Bob Mather, WI DNR, Director Bureau of Forest Management
Janel Pike, WI DNR, Forestry, GIS Coordinator/WISFIRS Project Manager
Jeff Prey, WI DNR, State Parks
Paul Pingrey, WI DNR, Forestry, Certification Coordinator
Teague Prichard, WI DNR, Forestry, State Forest Coordinator

Auditors Present:

Robert Hrubes, Lead Auditor
Mike Ferrucci, Lead Auditor
Bernie Hubbard, Team Member
JoAnn Hanowski, Team Member
Gary Zimmer, Team Member
Kathryn Fernholz, Team Member

10 AM Meetings (3 concurrent meetings)

1 – Planning	2 – Public Use Mgmt	3 – Endangered Resources
Mike Ferrucci	Robert Hrubes	Gary Zimmer
Kathryn Fernholz	Bernie Hubbard	JoAnn Hanowski
Randy Hoffman, WDNR, Land, State Natural Areas Ecologist	Carrie Morgan, WDNR, CAES Division, Bureau of Education and Information	Drew Feldkirchner, WDNR, Land, Conservation Biologist
Ann Runyard, WDNR, Land, GIS	Keith Warnke, WDNR, Land, Big Game Specialist	Kelly Kearns, WDNR, Land, Invasive Plant Coordinator
Loren Ayers, WDNR, Land, Bureau of Endangered Resources, Ecologist	Peter Biermeier, WDNR, Land, Bureau of Parks and Recreation	Sharene Smith, WDNR, Real Estate Closing Officer
Tom Watkins, WDNR, Land, Planner		Signe Holtz, WDNR, Land, Endangered Resources, Bureau Director
Alan Crossley, WDNR, Land, Wildlife Mgmt		
John Pohlman, WDNR, Land, Land Management Specialist		

11:15 AM Meetings (3 concurrent meetings)

1 – Forest Health	2 – Planning & Training	3 – Public Use
Mike Ferrucci	Robert Hrubes	Gary Zimmer
JoAnn Hanowski	Kathryn Fernholz	Bernie Hubbard
Eunice Padley, WDNR, Forestry, Forest Ecologist/Silviculturist	Rebecca Gass, WDNR, Forestry, Policy and Planning Analyst	Bob Mather, WDNR, Forestry, Director, Bureau of Forest Management
Thomas Boos, WDNR, Forestry, Forest Invasive Plant Coordinator	Mark Heyde, WDNR, Forestry, Chief, Planning and Analysis Section	Paul Pingrey, WDNR, Forestry, Forestry Certification Coordinator
Avery Dorland, WDNR, Forestry, Forest Geneticist and Nursery Coordinator	Quinn Williams, WDNR, Forestry Attorney	Teague Prichard, WDNR, Forestry, State Forests Coordinator
Darrell Zastrow, WDNR, Forestry, Director, Office of Forest Sciences	Michael Lutz, WDNR, Deputy Chief Counsel	Jeff Barkley, WDNR, Forestry, County Forest/Public Lands
David Lentz, WDNR, Forestry, Conservation Biologist	Janel Pike, WDNR, Forestry, GIS Coordinator, WISFIRS Project Manager	Kathy Mather, WDNR, Forestry, Forest Tax Section Financial Specialist
Jane Cummings Carlson, WDNR, Forestry, Forest Health Specialist	Wendy McCown, WDNR, Forestry, Director, Bureau of Forestry Services	James Warren, WDNR, Forestry, Chief, Forest Lands

Day 1 – Afternoon (Sept. 15)

- Goose Lake Wildlife Area /SNA
 - Reviewed grassland management and timber harvesting to restore grassland habitats, active operator with contractor on site
- Red Cedar Lake State Natural Area
 - Reviewed management goals and invasive species control activities including biological controls for purple loosestrife
- Aztalan State Park

Participants:

Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Doug Fendry, WDNR, Area Wildlife Supervisor
Mark Aquino, WDNR, South Central Region Land Leader
Jacob Fries, WDNR, Wildlife Biologist
Jeff Prey, WDNR, State Parks Planner
Randy Hoffman, WDNR, State Natural Areas Ecologist
Matt Zine, WDNR, State Natural Areas Biologist
Laurie Osterndorf, WDNR, Administrator, Land Division
Paul Pingrey, WDNR, Forest Certification Coordinator
Randy Stampfl, WDNR, Forester
Aaron Young, WDNR, Forestry Supervisor
Teague Prichard, WDNR, Forestry
Andrew Komassa, Weekly Timber-Pulp, Inc., Forester
Kathryn Fernholz, Auditor
Gary Zimmer, Auditor
Mike Ferrucci, Auditor
Robert Hrubes, Auditor
JoAnn Hanowski, Auditor
Bernie Hubbard, Auditor

Day 2 (Sept. 16)

Mid WI Team

George W. Mead Wildlife Area

- reviewed 28-acre aspen clearcut with retention and 2 acres of hardwood thinning
- reviewed 32-acre aspen clearcut with retention
- observed past hardwood thinning site

Participants:

Matt Slater, WDNR, Forester
Brian Peters, WDNR, Wildlife Technician
Shirley Bargander, WDNR, Forestry Team Leader
Arvid Haugen, WDNR, Regional Forestry Leader
Thomas Meier, WDNR, Mead Property Supervisor
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Teague Prichard, WDNR, Forestry

Mike Ferrucci, Lead Auditor
Gary Zimmer, Auditor

Rib Mountain State Park

- reviewed Master Plan and planning process
- reviewed state park facilities and lease site (cell tower)

Participants:

Bill Smith, WDNR, Northern Region Land Leader
Arvid Haugen, WDNR, West Central Region Forestry Leader
Shirley Bargander, WDNR, Wausau Forestry Team Leader
William Bursaw, WDNR, Rib Mountain State Park Property Manager
Teague Prichard, WDNR, Forestry
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Mike Ferrucci, Lead Auditor
Gary Zimmer, Auditor
Kathryn Fernholz, Auditor

Plover River Fishery Area

- Meeting with staff regarding management and planning
- site visit to review 73 acre sale (45 acres of aspen regeneration, 28 acres of hardwoods)

Ackley Wildlife Area

- review of aspen treatments to support grassland management and waterfowl habitat

Participants:

Chad Keranen, WDNR, Marathon County Forest Liaison
Tom Meronek, WDNR, Fish Biologist/Property Manager
Tom Duke, WDNR, Forestry Staff Supervisor
Eric Bouchert, WDNR, Wildlife Technician
Ted AveLallemant, WDNR, Forester
Mike Lietz, WDNR, Forestry Team Leader
Chuck McCullogh, WDNR, Wildlife Area Supervisor
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Rick Weide, WDNR Wildlife Biologist

East WI Team

Southern Unit of the Kettle Moraine State Forest
Lulu Lake Natural Area
Rome Pond Wildlife Area

Participants:

Brian Glenzinski, WDNR, Wildlife Biologist
Michael Sierger, WDNR, Forester
Jeff Prey, WDNR, State Parks-Madison
Matt Zine, WDNR, Natural Areas Program

Paul Pingrey, WDNR, Forest Certification Coordinator
Paul Sandgren, WDNR, Forest Superintendent
Joe Lennart, WDNR, LTE Forester
Owen Boyle, WDNR, Endangered Resources Ecologist
Frank Trcka, WDNR, Southeast Region Land Leader
Jeff Weatherly, WDNR, Southeast Region Forestry Leader

Northern Unit of Kettle Moraine State Forest - active timber harvest 5 mi. east of Kewaskum.

Participants:

Tim Beyer, WDNR, Senior Forester
Dan Weidert, WDNR, Wildlife Biologist
Jason Quant, WDNR, Assistant Superintendent

Day 3 (Sept. 17)

Mid WI Team

Pershing Wildlife Area

Participants:

Mark Schmidt, WDNR, Property Manager
Terry Tappon, WDNR, Forester
Tom Duke, WDNR, Regional Forestry Staff Supervisor
Pete Wisdom, WDNR, Forestry Team Leader
Kate Fitzgerald,
Gary Zimmer, Auditor

Jump River Fishery Area

Participants:

Mark Schmidt, WDNR, Wildlife Manager/Property Manager
Terry Tappon, WDNR, Forester
Tom Duke, WDNR, Regional Forestry Staff Supervisor
Pete Wisdom, WDNR, Forestry Team Leader
Jeff Scheirer, WDNR, Fishery Biologist/Property Manager
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Gary Zimmer, Auditor

Bearskin State Trail

Participants:

Tom Duke, WDNR, Forestry Staff Supervisor
Tim Friedrich, WDNR, Team Leader Forestry
Ron Eckstein, WDNR, Wildlife Manager
John Gillen, WDNR, Forester Ranger
John Brandenburg, WDNR, Property Manager

Chuck McCullough, WDNR, Wildlife Team Leader
Tim Miller, WDNR, Regional Parks & Recreation Supervisor
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Gary Zimmer, Auditor

Woodboro Lakes Wildlife Area

Participants:

Tom Duke, WDNR, Forestry Staff Supervisor
Tim Friedrich, WDNR, Team Leader Forestry
Ron Eckstein, WDNR, Wildlife Manager
John Gillen, WDNR, Forester Ranger
Chuck McCullough, WDNR, Wildlife Team Leader
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Gary Zimmer, Auditor

Flambeau River State Forest

- review of road system, stops to review stream crossing, timber stand improvement, hardwood and pine plantation thinning, spruce thinning, and hardwood thinning

Participants:

Carmen Wagner, WDNR, Forest Hydrologist
Mike Luedeke, WDNR, Regional Forester
Larry Glodoski, WDNR, Area Forester
Teague Princhar, WDNR, Forestry, State Forest Coordinator
Heidi Brunkow, WDNR, Forester
Jim Halvorson, WDNR, Superintendent/Forester
Mike Ferrucci, Lead Auditor
Kathryn Fernholz, Auditor

Willow Flowage Scenic Waters Area

- review of master plan and timber harvest plans, visit to recent aspen thinning with management goal of transition to pine cover type

Participants:

Carmen Wagner, WDNR, Forest Hydrologist
Mike Luedeke, WDNR, Regional Forester
Teague Princhar, WDNR, Forestry, State Forest Coordinator
Kelly Moermond, WDNR, Law Enforcement Ranger
Steve Petersen, WDNR, Superintendent
Paul DeLong, WDNR, State Forester
Tom Duke, WDNR, Forestry Staff Supervisor
Jeff Olsen, WDNR, Northern Highlands American Legion State Forest Team Supervisor
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Mike Ferrucci, Lead Auditor
Kathryn Fernholz, Auditor

Gary Zimmer, Auditor
Tom Shockley, WDNR, Property Manager

East WI Team

Mud Lake Wildlife Area

Participants:

Aaron Buchholz, WDNR, Wildlife
Joe Henry, WDNR, Endangered Resources
Curt Wilson, WDNR, Regional Forester
Chris Plzak, WDNR, Door County Forester
Paul Pingrey, WDNR, Forest Certification Coordinator-Madison
Jeff Prey, WDNR, State Parks-Madison
Jean Romback-Bartels, WDNR, Northeast Region Land Leader

Whitefish Dunes State Park

Participants:

Carolyn Rock, WDNR, Educator
Tony Knipfer, WDNR, Ranger
Rich Ostrowski, WDNR, Manager

Potawatomi State Park

Participants:

Don McKinnon, WDNR, Park Superintendent

Red Banks Wildlife Area

Participants:

Aaron Buchholz, WDNR, Wildlife

Day 4 (Sept 18)

Mid WI Team

Northern Highlands – American Legion (NHAL) State Forest

- review of jack pine planting and regeneration site, review of the Raven sale and recreational uses in area of hardwood thinning

Participants:

Jim Wetterau, WDNR, NHAL Forester
Paul Schultz, WDNR, NHAL Forester
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Todd Anderson, WDNR, NHAL Forester
Cal Doering, WDNR, NHAL Forester
Brett Bockhop, WDNR, NHAL Law Enforcement

Teague Prichard, WDNR, Forestry
Tim Friedrich, WDNR, Forestry
Tom Duke, WDNR, Regional Staff Supervisor
Craig Dalton, WDNR, NHAL Forester
Ron Eckstein, DNR, Wildlife Biologist
Steve Petersen, WDNR, Superintendent
Kelly O'Neil, WDNR, NHAL Forester
Gary Zimmer, Auditor
Kathryn Fernholz, Auditor

Bolger Lake (Scattered Forest Lands)

- review of wildlife area and oak regeneration treatments and recreational uses, review of Highway 47 right-of-way sale including aspen cut and hardwood thinning

Participants:

Jim Wetterau, WDNR, NHAL Forester
Paul Schultz, WDNR, NHAL Forester
Kate Fitzgerald, WDNR, Chief, Land Management and Planning
Todd Anderson, WDNR, NHAL Forester
Cal Doering, WDNR, NHAL Forester
Brett Bockhop, WDNR, NHAL Law Enforcement
Teague Prichard, WDNR, Forestry
Tim Friedrich, WDNR, Forestry
Tom Duke, WDNR, Regional Staff Supervisor
Craig Dalton, WDNR, NHAL Forester
Ron Eckstein, WDNR, Wildlife Biologist
Steve Petersen, WDNR, Superintendent
Kelly O'Neil, WDNR, NHAL Forester
Gary Zimmer, Auditor
Kathryn Fernholz, Auditor

East WI Team

LaSage WA - a unit of the Lower Wolf River Bottomlands Natural Resource Area

Participants:

Frank Kirchling, WDNR, Forester
Kay Brockman-Medegas, WDNR, Wildlife Biologist
James Robaidek, WDNR, Wildlife Tech
Tom Nigus, WDNR, Area Wildlife Superintendent
Ron Jones, WDNR, Forestry, Area Supervisor
Kendall Kempke, WDNR, Fisheries Biologist

Hartman Creek State Park

Participants:

Michael Bergum, WDNR, Superintendent
Steve Hoffman, WDNR, Wildlife Biologist

Mike Schuessler, WDNR, Forester
Buzz Vahradian, WDNR, Forestry Supervisor

Day 5 (Sept. 19)

Exit meeting in at WDNR Offices in Madison

Participants:

Paul DeLong, WDNR, State Forester
Paul Pingrey, WDNR, Forestry, Forest Certification Coordinator
Dave Birren, WDNR, Land, Forest Certification Coordinator
Teague Prichard, WDNR, State Forest Specialist
Peter Biermeier, WDNR, State Parks & Trails
Jeff Prey, WDNR, State Parks
Kate Fitzgerald, WDNR, Chief, Land Management and Planning also acting for Steve Miller,
Director, Bureau of Facilities & Lands
Kristen Tomaszewski, WDNR, Forestry & Watershed Planner
Drew Feldkirchner, WDNR, Endangered Resources, Forestry Liaison
Randy Hoffman, WDNR, State Natural Areas
Jamie MacAvistor, WDNR, State Forest Master Planning, Forestry
Tom Watkins, WDNR, Planner, Bureau of Facilities & Lands
Bill VanderZouwen, WDNR, Wildlife Ecology Section Chief
Darrell Zastrow, WDNR, Director, Office of Forest Sciences
Alan Crossley, WDNR, Wildlife Public Lands Specialist
Sarah Shapiro-Hurley, WDNR, Deputy Administrator, Land Division
Laurie Ostendorf, WDNR, Administrator, Land Division
Mark Aquino, WDNR, Land Leader, South Central Region
Signe Holtz, WDNR, Endangered Resources Bureau Director
Robert Hrubes, Lead Auditor
Mike Ferrucci, Lead Auditor
JoAnn Hanowski, Auditor
Kathryn Fernholz, Auditor

3.3.5 Stakeholder Consultation

Pursuant to SCS protocols, consultations with key stakeholders were an integral component of the evaluation process. Consultation took place prior to, concurrent with, and following the field evaluation. The following were distinct purposes to the consultations:

- To solicit input from affected parties as to the strengths and weaknesses of the Wisconsin Department of Natural Resource's management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests.

Principal stakeholder groups of relevance to this evaluation were identified based upon results

from the scoping evaluation, lists of stakeholders from the WDNR and previous assessments, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders:

- WI DNR employees, including headquarters and field and different divisions
- contractors
- lease holders
- adjacent property owners
- Pertinent Tribal members and or representatives
- Members of the Lake States-Central Hardwoods FSC Working Group/National Initiative
- FSC International
- Local and regionally-based environmental organizations and conservationists
- Local and regionally-based social interest organizations
- Forest industry groups and organizations
- Purchasers of logs harvested on WI DNR managed forestlands
- Local, State and Federal regulatory agency personnel
- User groups, such as hikers, ATV users, and others

Prior to, during, and following the site evaluation, a wide range of stakeholders from the regional area were consulted in regard to their relationship with the WI DNR, and their views on the management of the state managed lands. Stakeholders included FSC contact persons, government and non-government organizations involved in forest management, local citizens and groups, employees, contractors, and others. More than 150 stakeholders were contacted during the assessment process. Stakeholders were contacted with a notification mailing soliciting comment and/or phone contact. Comments were received via meetings and personal interviews “face-to-face”, phone interviews (“Interview”), and through written responses. Stakeholders provided permission for their names to be listed in the report. Additional comments may have been received from individuals not wishing to reveal their identities.

Name	Affiliation	Consultation
John Camacho	Lakeland Area Mountain Bike Organization	Interview
Vern Everson	WDNR, Forest Resource Analyst	Interview
Fred Clark	Member, Governors Council on Forestry	Interview
Jonathan Gilbert	Great Lakes Indian Fish and Wildlife Commission	Interview
Doug Haag	WDNR, Section Chief, Real Estate Division	Interview
Randy Harding	Wisconsin ATV Association	Interview
Charlie Luthin	Natural Resource Foundation of Wisconsin	Interview

Terry Mace	WDNR, Forest Resource Analyst	Interview
Steve Miller	WDNR, Director of Facilities and Land	Interview
Paul Mueller	Lumberjack RC&D	Interview
Don Reed	Kettle Moraine Natural History Association, Southern Unit Friends Group	Interview
Rebecca Schroeder	WDNR, Section Chief, Endangered Resources	Interview
Fred Souba	NewPage Corporation	Interview
Shahla M. Werner	Sierra Club	Interview

3.3.5.1 Summary of Stakeholder Concerns and Perspectives and Responses from the Team Where Applicable

A summary of the major perspectives and concerns expressed by the stakeholders that were consulted during the course of this evaluation include:

Economic Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> There is a significant gap in road maintenance funding and it is impacting all of the lands, especially State Parks. 	See OBS 2008.2
<ul style="list-style-type: none"> Forest industry employment continues to decline and industries are being lost to foreign competition. 	The audit team agrees that global market trends are relevant to the assessment of the WDNR's land management activities.
<ul style="list-style-type: none"> Biomass energy developments are an area of growth. 	See CAR 2008.5
<ul style="list-style-type: none"> There are opportunities to re-introduce sharp-tailed grouse. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> The DNR does not provide timely reporting to account for grant expenditures and accomplishments. 	No evidence of non-compliance was identified. Compliance with reporting requirements will continue to be monitored.
<ul style="list-style-type: none"> The DNR is the catalyst for making business participation in certification possible. 	Duly noted and incorporated into this

	report
<ul style="list-style-type: none"> Potential to include trees from urban areas in certification or recycling initiatives. 	The audit team agrees that opportunities exist to improve urban wood utilization; however, this is currently outside the scope of the assessment of WDNR lands.
<ul style="list-style-type: none"> The certification process and timelines for corrective action requests need to be sensitive to the demands of the public process that public agencies must follow. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> Certification of state lands is important and helps Wisconsin's industry's meet customer demands. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> Timber revenues could provide an incentive for improved management of park properties. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> Need a more defined ATV policy for state lands and more efficient planning process to also address tribal use and access consistently. 	The audit team will continue to monitor motorized and non-motorized recreation activities and policies.
<ul style="list-style-type: none"> Plans for Black River and Flambeau need to allow for continued motorized trail use and avoid constructing trails that are over-built and create road-like riding experiences. 	The audit team will continue to monitor the development of Master Plans.
<ul style="list-style-type: none"> DNR lacks the resources to effectively manage and monitor its land base and has more land than they can handle. 	See CAR 2008.3

Social Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> The best part of working with the DNR is the good resource people. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> Certification has made the Division of Forestry more open to stakeholder input and certification has been very helpful for improving communications. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> The forest supervisor has been very responsive [to recreational user concerns] and good to work with. 	Duly noted and incorporated into this report

<ul style="list-style-type: none"> The Land Division needs to consult with tribal interests in the management of their various types of properties. 	See OBS 2008.9
<ul style="list-style-type: none"> Tribes need information about what uses are allowed on the various types of Land Division properties. 	See OBS 2008.9
<ul style="list-style-type: none"> Need clarity on rights and permit process to harvest non-timber forest products on state forests and other DNR managed lands. 	See OBS 2008.9
<ul style="list-style-type: none"> DNR needs to do more land acquisition in the more populated parts of southeastern Wisconsin 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> The DNR is responsive to [contractor] suggestions and feedback. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> The DNR has excellent leadership, especially the forestry leadership team that is creative, collaborative and meeting the needs of stakeholders. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> DNR does not utilize the cultural resource officers that are available and have expertise at each Tribe. 	See OBS 2008.9
<ul style="list-style-type: none"> Timber harvesting doesn't fit well with desired recreation activities and would prefer to see areas set aside without management. 	See OBS 2008.3, Obs. 2008.5
<ul style="list-style-type: none"> The DNR provides good opportunities for input to management decision-making, good communication and open information sharing. 	Duly noted and incorporated into this report

Environmental Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> Lack of adequate management plans for state managed properties 	See CAR 2008.1, CAR 2008.2
<ul style="list-style-type: none"> Certification is a good thing because it raises the bar on how lands are managed and requires that plans be implemented 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> Opposed to delisting of gray wolf and the proposed state management. 	The audit team will continue to monitor the status of the gray wolf and its management in Wisconsin.
<ul style="list-style-type: none"> DNR needs to continue to work on implementing plans. 	See CAR 2008.2
<ul style="list-style-type: none"> Carbon credit markets distract from the more 	Duly noted and

	incorporated into this report
<ul style="list-style-type: none"> • Management on wildlife properties is inconsistent and varies depending on the local manager’s interests and motivations. 	See CAR 2008.3
<ul style="list-style-type: none"> • Concern about how forest certification applies to state lands managed for non-forest uses and if forest management will be required. 	See OBS 2008.5
<ul style="list-style-type: none"> • Land managers need to collaborate across land types and integrate their learning and expertise across professions. 	See OB 2008.5
<ul style="list-style-type: none"> • DNR is doing a good job looking at all land types and their focus on rare, threatened and endangered species is an area of success. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> • Invasive species are taking over on properties that are not actively managed. 	See OBS 2008.11
<ul style="list-style-type: none"> • Need pilot projects to demonstrate better management on park lands. 	Duly noted and incorporated into this report
<ul style="list-style-type: none"> • DNR is unwilling or unable to reduce deer population densities to levels that are acceptable 	See OBS 2008.4

3.4 Total Time Spent on Audit

The total person days spent on the evaluation was associated with a six (6) person audit team with two days of pre and post assessment work in addition to five field days and site visits for a total of 42 person days. The calculation includes time spent on pre-evaluation or other preparatory work, time spent auditing documents and records, interviewing stakeholders, and carrying out field work, but excluding travel to and from the region in which the certified forest is located.

3.5 Process of Determining Conformance

FSC accredited forest stewardship standards consist of a three-level hierarchy, principle, then the criteria that make up that principle, then indicators that make up each criteria. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each non-conformance must be evaluated to determine whether it constitutes a major or minor non-conformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-conformance. The team must use their collective judgment to assess each criterion and determine if it is in conformance. If the forest management operation is determined to be in non-conformance at the criterion level, then at least one of the indicators must be in major non-conformance.

Corrective action requests (CAR's) are issued for every instance of non-conformance. Major non-conformances trigger Major CAR's and minor non-conformances trigger Minor CAR's

Interpretations of Major CAR's (Preconditions), Minor CARs and Recommendations

Major CARs/Preconditions: Major non-conformances, either alone or in combination with non-conformances of other indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out prior to award of the certificate. If major CAR's arise after an operation is certified, the timeframe for correcting these non-conformances is typically shorter than for minor CAR's. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

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

Observations (OBS): These are suggestions that the audit team concludes would help the Department move even further towards exemplary status. Action on the recommendations is voluntary and does not affect the maintenance of the certificate. Recommendations/observations can be subsequently changed to CARs if performance with respect to the criterion triggering the recommendation/observation falls into non-conformance.

4.0 RESULTS OF THE EVALUATION

Table 4.1 below, contains the evaluation team's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. The table also presents the corrective action request (car) numbers related to each principle.

Table 4.1 Notable strengths and weaknesses of the forest management enterprise relative to the P&C

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/OBS #s
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> ▪ Creation of “The Sustainability Framework” as a tool to support monitoring 	<ul style="list-style-type: none"> ▪ Need to have a system of identifying any conflicts between WDNR regulations and the FSC Principles and Criteria 	<ul style="list-style-type: none"> ▪ CAR 2008.7 ▪ OBS 2008.10
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> ▪ All legal rights associated with lands managed by the WDNR are appropriately documented ▪ WDNR provides for a full and robust array of public uses on the lands it manages. 		
P3: Indigenous Peoples’ Rights	<ul style="list-style-type: none"> ▪ Consultation with tribal groups is on going, including formal, periodic meetings as well as in-formal conversations and open communications, and effective mechanisms exist to protect sites of special significance. 	<ul style="list-style-type: none"> ▪ Consultation specific to the different types of lands administered by the WDNR 	<ul style="list-style-type: none"> ▪ OBS 2008.9
P4: Community Relations & Workers’ Rights	<ul style="list-style-type: none"> ▪ The WDNR workforce demonstrates a high degree of commitment to their work and to the natural resources they are charged with managing in the peoples’ interest. Land managers have stable relationships with contractors and employees indicate satisfaction with the work. 	<ul style="list-style-type: none"> ▪ Lack of spill kits at active harvest sites 	<ul style="list-style-type: none"> ▪ OBS 2008.1 ▪ OBS 2008.6 ▪ OBS 2008.7
P5: Benefits from the Forest	<ul style="list-style-type: none"> ▪ WDNR has demonstrated a commitment to the long term management of state lands for diverse 	<ul style="list-style-type: none"> ▪ Completion of the biomass harvesting guidelines, including woody 	<ul style="list-style-type: none"> ▪ CAR 2008.5

	environmental and social benefits and economic viability. The updated Master Planning process emphasizes a long term perspective.	debris retention and recruitment standards	
P6: Environmental Impact	<ul style="list-style-type: none"> ▪ The WDNR is doing an excellent job of evaluating environmental impacts and applying appropriate management options for various habitat types. ▪ Ecological assessments and management options are clearly identified in updated Master Plans. ▪ Wisconsin has one of the best SNA programs. 	<ul style="list-style-type: none"> ▪ Completion of Best Management Practices to address invasive species ▪ Communication of chemical pesticide training and requirements ▪ Timely entry of Natural Heritage Inventory data ▪ Risk assessments for the use of exotic/non-native species 	<ul style="list-style-type: none"> ▪ CAR 2008.6 ▪ CAR 2008.8 ▪ CAR 2008.9 ▪ OBS 2008.2 ▪ OBS 2008.8 ▪ OBS 2008.11
P7: Management Plan	<ul style="list-style-type: none"> ▪ The updated Master Plan Handbook and updated Master Plans do an excellent job of addressing the requirements of P7. 	<ul style="list-style-type: none"> ▪ Development of interim guidance on lands that lack Master Plans ▪ Continued progress on Master Plan development, implementation, and training 	<ul style="list-style-type: none"> ▪ CAR 2008.1 ▪ CAR 2008.2 ▪ OBS 2008.3 ▪ OBS 2008.5
P8: Monitoring & Assessment	<ul style="list-style-type: none"> ▪ A Master Plan monitoring process has been created and implementation has begun. ▪ The WISFIRS system provides excellent data collection and monitoring opportunities 	<ul style="list-style-type: none"> ▪ Expansion of the Master Plan monitoring and evaluation reporting procedures and associated training 	<ul style="list-style-type: none"> ▪ CAR 2008.3 ▪ OBS 2008.4
P9: Maintenance of High Conservation Value Forest	<ul style="list-style-type: none"> ▪ WDNR has demonstrated its commitment to identify and conserve HCV forests by conducting several comprehensive assessments and the findings have been publically reported. 	<ul style="list-style-type: none"> ▪ Application of HCVF requirements to include state properties administered by the Division of Land within the scope of 	<ul style="list-style-type: none"> ▪ CAR 2008.4

		the certificate	
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4.2 Preconditions

Preconditions are major corrective action requests that are issued to the certification applicant after the initial evaluation and before the forest management operation is certified. Certification cannot be awarded if open preconditions exist.

No preconditions were issued to the Wisconsin Department of Natural Resources (WDNR) as a result of the re-certification evaluation.

5.0 CERTIFICATION DECISION

5.1 Certification Recommendation

As determined by the full and proper execution of the *SCS Forest Conservation Program* evaluation protocols, the evaluation team hereby recommends that the Wisconsin Department of Natural Resources retain FSC certification as a “Well-Managed Forest” subject to the corrective action requests stated in Section 5.2. The Wisconsin Department of Natural Resources has demonstrated that their system of management is capable of ensuring that all of the requirements of the Lake States-Central Hardwoods Region (USA) Regional Forest Stewardship Standard Version 3.0 are met over the forest area covered by the scope of the evaluation. The Wisconsin Department of Natural Resources has also demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.

5.2 Initial Corrective Action Requests

Background/Justification: FSC Principle 7 requires that management of certified lands be guided by management plans that are “written, implemented and kept up to date.” The WDNR has made substantial progress toward planning for the strategic development of Master Plans for state managed properties by using a well-structured 3-tiered approach. In the interim as plans are being developed, the WDNR needs to institute measures for maintaining the currency of operational components of outdated plans and/or providing operational guidance for Tier 1 and Tier 2 properties that lack a plan. These efforts should include correlating the annual work plans with the master plans or other guidance documents and addressing the management plan requirements of Principle 7.	
CAR 2008.1	By the time of the first annual audit after award of certification, WDNR must develop protocols and make substantial progress in developing key operational components of the Master Plans for state-managed properties that will not be undergoing a full re-planning within the next 5 years. Key components to develop include: management objectives for each property (by individual tract

	or groups), descriptions of the natural resources to be managed, the management systems to be used, and any unique considerations for the property. Updates should be made publicly available (e.g., through updates to property websites).
Deadline	2009 annual audit
Reference	<i>FSC Indicators 7.1.a.2, 7.2.a., 7.3.a</i>

Background/Justification: The WDNR has developed a plan for completing Master Plans for Tier 1 and Tier 2 properties. There is a 10-12 year timeframe for the process of developing these plans. This timeframe should be accelerated as much as possible and training efforts should be planned to accompany plan implementation.	
CAR 2008.2	The WDNR must provide an update on progress toward the Master Planning goals on an annual basis as well as the training programs for supporting plan development and implementation.
Deadline	2009 annual audit
Reference	<i>FSC Indicators 7.1.a.2, 7.2.a., 7.3.a</i>

Background/Justification: The WDNR has implemented a process for State Forest Master Plan Monitoring and Evaluation Reporting. The Master Plan monitoring process needs to be expanded to include those properties managed by the Division of Land. The expanded Master Plan monitoring and evaluation reporting process should also be supported by training or additional guidance that increases consistency in the reporting and more clearly links accomplishments with management objectives and goals.	
CAR 2008.3	By the next annual audit, Wisconsin DNR must develop and apply a property plan implementation and monitoring reporting template and instructions in order to expand the Master Plan monitoring and evaluation reporting procedures to include properties administered by the Division of Land and provide evidence of training or guidance that provide direction on how to complete the reporting in a manner that links to the management objectives and quantified progress toward goals.
Deadline	2009 annual audit
Reference	<i>FSC Indicator 8.1.b</i>

Background/Justification: The WDNR, Division of Forestry, has developed a written crosswalk between HCVF requirements found in P.9 and DNR's approach to identifying and managing areas of high conservation value. This crosswalk needs to be expanded to address state properties administered by the Division of Land that are within the scope of this certification evaluation.	
CAR 2008.4	By the time of the first annual audit, the Division of Land must update the HCVF crosswalk to include properties it administers. This expanded crosswalk must demonstrate that management of all DNR-administered properties within the scope of this certification evaluation meets the HCVF requirements set forth in Principle 9.

Deadline	2009 annual audit
Reference	<i>FSC Indicator 9.3.a</i>

Background/Justification: The WDNR has developed guidelines for biomass harvesting that include woody debris retention and recruitment standards. The guidelines were in the public review process at the time of the September 2008 assessment.	
CAR 2008.5	At the time of the first annual audit, the WDNR must update SCS on the status of the implementation of the guidelines. If the guidelines are not approved and disseminated in a timely manner the WDNR will need to identify an alternative approach to address woody debris retention in the context of biomass harvesting operations on properties included in the scope of this certification evaluation.
Deadline	2009 annual audit
Reference	<i>FSC Indicators 5.3.a, 6.3.b, and 6.3.c</i>

Background/Justification: The WDNR has inconsistent guidance regarding the training and licensing requirements for chemical pesticide applicators. The FSC Lakes States Regional Standard also requires that an up-to-date list of all chemical pesticides being used on WDNR-managed properties is provided to the certification body to confirm compliance with the FSC Pesticides Policy; that is, to confirm that no chemicals on the FSC prohibited list are in use on certified properties. It is also required that land managers employ integrated pest management and other strategies that effectively minimize the use of chemical pesticides.	
CAR 2008.6	The WDNR must provide evidence of clearly communicated chemical pesticide training and licensing requirements and implement training programs, as needed. The WDNR must also provide an up-to-date complete list of chemical pesticides being used on properties within the scope of the certification evaluation. The WDNR must provide evidence of an integrated pest management policy or other strategies that result in the reduction, avoidance, and minimization of chemical pesticide use.
Deadline	2009 annual audit
Reference	<i>FSC Indicator 6.6.b</i>

Background/Justification: The FSC Lake States Regional Standard requires that when conflicts between legal mandates and conformance with the FSC Principles and Criteria occur that such conflicts are referred to the appropriate FSC body for guidance and resolution. To comply with this requirement it is necessary that responsible parties including field staff have sufficient familiarity with the FSC standard to be able to recognize potential conflicts and that guidance is provided regarding reporting mechanisms. Certification training should be provided to staff consistent with their roles and may include the use of information tools, handbook revisions and other delivery mechanisms or approaches.	
CAR 2008.7	The written commitment must be conveyed to SCS that WDNR will bring any conflicts between applicable laws/regulations and the FSC certification standard to the attention of FSC/SCS. This commitment must be supported by

	actions aimed at improving relevant DNR employees' familiarity with the FSC Lake States Regional Standard including providing ready access to the full standard.
Deadline	2009 annual audit
Reference	<i>FSC Indicator 1.4.a</i>

Background/Justification: The FSC Lake States Regional Standard requires the protection of threatened, endangered, of special concern, or sensitive species and their habitats. A key step to complying with this requirement is the use of a robust Natural Heritage Inventory (NHI) database that is inclusive and kept up to date. The WDNR must ensure that land managers are provided the most current NHI data possible and that where a backlog in data entry occurs land managers must still be able to access records of occurrences and/or expert advice. To the extent practical, staff and resources should be reallocated to address the data entry backlog. The WDNR must also ensure that all recorded occurrences (including those not yet entered in the database) are included in Master Plan development and operational planning.	
CAR 2008.8	By the time of the first annual audit, the WDNR must provide a report on the status of the data entry backlog, efforts that are underway to address the backlog (including collaborations with stakeholders), and evidence of guidance that addresses the procedures land managers must use to access the most current records and information and details for how this procedure is used for Master Plan development and operational planning.
Deadline	2009 annual audit
Reference	<i>FSC Indicator 6.2.e.</i>

Background/Justification: The FSC Lake States Regional Standard requires that the use of exotic/non-native species be informed by a risk assessment conducted prior to their use.	
CAR 2008.9	The WDNR must demonstrate that risk assessments for the use of exotic/non-native species (such as in seed mixes for erosion control and other management applications) are completed prior to such use.
Deadline	2009 annual audit
Reference	<i>FSC Indicator 6.9.b</i>

Observation 2008.1: Field visits during the September 2008 evaluation resulted in observed instances of contractors having first aid kits and spill kits kept in vehicles at the landing and not at the active harvest site. Training should emphasize the importance of health and safety materials being kept in multiple locations and/or with the operators and equipment.

Observation 2008.2: The WDNR has made significant efforts to ensure that road, trail and other transportation systems on state managed lands are designed to required standards. However, this level of performance cannot be maintained without adequate and reliable dedicated funding and staff. There is currently no secure funding source for road maintenance, leading to auditor concerns about the frequency of road maintenance treatments (such as grading) and BMP compliance.

Observation 2008.3: The WDNR is instituting a plan for developing Master Plans for state managed lands. To support the timely, consistent and constructive development and implementation of Master Plans, the WDNR may want to engage in a process to promote the benefits of Master Plans to field personnel. The communication efforts could also help identify and address any field-level questions or concerns about the plans and planning process.

Observation 2008.4: The State of Wisconsin has made significant efforts to monitor the deer population in the state, set population goals, and manage deer in a manner that supports multiple land management objectives. The WDNR has tried a variety of hunting season structures and regulations in an effort to bring deer populations closer to desired levels. Deer levels vary throughout Wisconsin; in general populations are somewhat above target but generally not significantly so. Negative impacts to desirable advanced regeneration from deer browse were observed in many forests, particularly in east-central Wisconsin. Ongoing efforts to set and achieve deer population targets at which forest components and diversity can be sustained should be encouraged. Continuing attention is warranted.

Observation 2008.5: There are opportunities for better understanding on the part of some Forestry Division field foresters of Division of Land management objectives for state parks, wildlife areas, and other properties administered by the Land Division so that stand management prescriptions designed for these categories of properties will better contribute to management objectives, objectives that typically do not include sustained yield timber production.

Observation 2008.6: Recognizing that the WDNR does not regulate workers compensation insurance rates and that the agency did testify in support of rate changes, logging and roading contractors have expressed concerns about current workers compensation insurance rates and the lack of distinction between hand-felling and mechanized operations. These stakeholders concerns and the status of any legislative actions will continue to be monitored.

Observation 2008.7: Concerns have been raised by some DNR field personnel regarding the potential use of contract foresters for land management activities on State Forests, a strategy that is being considered in response to the mandate for WDNR to meet timber production goals. The administrative rule that sets up forester contracting includes contractor training requirements and safeguards on contractor performance. Property managers are phasing in contracting trials to assure the concept works as intended. The results of these trials could be monitored and a report prepared to summarize the findings and provide recommendations.

Observation 2008.8: Field personnel were found to have a lack of familiarity with the rutting guidelines and thresholds. While it was confirmed that the guidelines are included in the contracts and as such, are readily available, there is nonetheless an opportunity to improve the working knowledge of the guidelines with foresters who are overseeing logging operations.

Observation 2008.9: There are opportunities for the Division of Land to enhance tribal stakeholder consultation related to land management activities and impacts on traditional uses and customary rights. The consultation could include a specific request for land management input from tribal interests and representatives. Consultation could also include providing information to tribal members to clarify which activities are permitted on the various land classifications and guidance for non-timber forest product gathering.

Observation 2008.10: The WDNR may find benefit in continuing to develop The Sustainability Framework as an element of its 10-year Statewide Forest Assessment. The Framework includes its own Criteria and Indicators for Sustainable Forest Management and provides an opportunity to gather valuable, readily available statewide information without additional data generation. Given the statewide scale and scope of WDNR land management the scale of the Framework assists in meeting the need for landscape scale monitoring.

Observation 2008.11: The WDNR should complete the process of developing Best Management Practices (BMPs) that address invasive species in forest management and methods for incorporating observed instances of invasive species into the inventory data. The program could include specifics on mapping/identification, removal/control, and prevention, including specifically how the major pathways of invasive species introduction will be contained/controlled.

6.0 SURVEILLANCE EVALUATIONS

If certification is awarded, surveillance evaluations will take place at least annually to monitor the status of any open corrective action requests and review the continued conformance of the Wisconsin Department of Natural Resources to the applicable FSC standard. The applicable standard is currently the Lake States-Central Hardwoods Region (USA) Regional Forest Stewardship Standard Version 3.0. The FSC-US is undergoing a standards revision process and future surveillance audits will be conducted under the applicable standard which may be different from the current standard. Public summaries of surveillance evaluations will be posted separately on the SCS website (www.scscertified.com).

6.1 2009 Annual Audit

6.1.1 Assessment Dates

The field and office components of this surveillance audit took place during August 12-14, 2009.

6.1.2 Assessment Personnel

Dr. Robert J. Hrubes, Lead Auditor: Dr. Hrubes is Senior Vice-President of Scientific Certification Systems. He is a registered professional forester and forest economist with 27 years of professional experience in both public and private forest management issues. Dr. Hrubes worked in collaboration with SCS to develop the programmatic protocol that guide all SCS Forest Conservation Program evaluations. Dr. Hrubes has led numerous SCS Forest Conservation Program evaluations of North American (U.S. and Canada) industrial forest ownerships, as well as operations in Scandinavia, Chile, and Japan. He also has professional work experience in Brazil, Germany, Guam (U.S.), Hawaii (U.S.), and Malaysia. Dr. Hrubes is the principal author of this audit report.

Mr. Michael Ferrucci, Team Member: Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 18 years. Its clients include private citizens, land trusts, municipalities, corporations, private water companies, and non-profit organizations. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies.

JoAnn Hanowski, M.Sc., Audit Team Member; Biology/Ecology Specialist-

JoAnn M. Hanowski was a senior research fellow at the University of Minnesota-Duluth's Natural Resources Research Institute. She has considerable expertise evaluating the effects of forest management on wildlife habitat, and is currently working on research projects involving the response of birds to various forest management practices in stream and seasonal pond buffers and the development of indicators of forest and water health and sustainability in Minnesota and

across the Great Lakes. She was a member of the forest bird technical team for the original GEIS and participated on the wildlife technical team that wrote forest management guidelines for Minnesota. She served on the riparian science technical committee that investigated the effectiveness of Minnesota's current guidelines for forest management in riparian systems and provided scientific expertise for Minnesota's biomass harvesting guidelines. She has published 67 peer-reviewed journal articles and over 75 reports in her 21 year tenure with the University of Minnesota. In 2005 JoAnn participated in the largest forest certification project ever conducted in the United States, the joint FSC/SFI certification of Minnesota's state lands. JoAnn has contributed regional ecological expertise to the FSC and SFI audits in MN, WI and MA and now lives in VT.

6.1.3 Assessment Process

The scope of the 2009 audit included the following activities: document review, auditors spending time in the field and office, interviewing management personnel and, as appropriate, interacting with outside stakeholders. To enhance the efficiency and effectiveness of the assessment, the audit team was divided into three sub-teams that traveled to different sites. The use of three sub-teams allowed for more diversity and geographic coverage of field sites that could be visited within the allotted time frame.

The auditors inspected a variety of field sites to assess conformance with selected elements of the Lakes States-Central Hardwoods FSC Regional Standard. During the audit planning phase, the Lead Auditor and the WDNR representative reviewed the range of field activities and formulated a sampling plan. The Lead Auditor and WDNR representatives first determined appropriate sample areas or geographic strata within which to sample field sites. The Lead Auditor then used randomized selection methods to select a subset of all available sales and assigned a priority number to each site. Wisconsin DNR staff members worked with the Lead Auditor to designate the final selection list from this prioritized list and final adjustments were made during the audit to ensure flexibility and to allow for additional samples, as needed. Local WDNR field staff assisted with scheduling appropriate field site visits in a manner that balanced efficiency of travel routes, the priority number for sites, and factors designed to assure coverage of key issues relative to the certification standard.

Field Sites and Schedule of Site Visits:

Date	Location	Participants
<u>August 12, 2009</u>	<u>WDNR Offices in Madison</u>	Robert Hrubes, Lead Auditor Mike Ferrucci, Lead Auditor JoAnn Hanowski, Team Member Quinn Williams, DNR Forestry Attorney Kristin Shy, DNR State Forests Teague Prichard, State Forest Specialist Paul Pingrey, DNR Forest Certification Coordinator Tom Watkins, Facilities and Lands Kelly Kearns, Endangered Resources Kate Fitzgerald, Facilities and Lands Bob Mather, Bureau of Forest Management Randy Hoffman, State Natural Areas Jeff Barkley, Bureau of Forest Management Drew Feldkirchner, Forestry/Endangered Resources Tom Boos, Office of Forest Sciences
<u>August 12, 2009</u>	<u>Glacial Habitat Restoration Area</u>	Mike Ferrucci Curt Wilson, Regional Forestry Leader Jeff Pritzel, Regional Wildlife Supervisor Ron Jones, Lakeshore Area Forestry Team Leader Mark Randolph, Wildlife Biologist Wade Oehmichen, Property Manager Tom Vanden Elzen (FR Fond du lac)
	<u>Mullet Creek / Collins Marsh Wildlife Management Areas</u>	Mike Ferrucci Aaron Buchholz, Wildlife Biologist Sue Crowley, Forester FR Manitowoc Jack Kellerman, Wildlife LTE Others from previous list continued on
	<u>Point Beach State Forest</u>	Mike Ferrucci Guy Willman, Superintendent Bryon Woodbury (Wildlife Biologist) Erin, Ranger PBSF
	<u>Quincy Bluff and Wetlands</u>	JoAnn Hanowski Bob Mather, Drew Feldkirchner Greg Dahl (Area Wildlife Supervisor), Steve Courtney (Area Forestry Leader) Nina Stensburg (Forester), & others.
	<u>Roche-A-Cri State Park.</u>	JoAnn Hanowski Bob Mather, Drew Feldkirchner Greg Dahl (Area Wildlife Supervisor), Steve Courtney (Area Forestry Leader) Joe Stecker Kochanski (Park Manager), Nina Stensburg (Forester), & others.
	<u>Emmons Creek Fishery Area</u>	JoAnn Hanowski Bob Mather, Drew Feldkirchner Greg Dahl (Area Wildlife Supervisor), Steve Courtney (Area Forestry Leader), Tom Meronek (Fisheries), Shirley Bargander (Forestry Team Leader) & others.
	<u>3 field stops Lower Wisconsin State Riverway (Peck's Landing, WP&L, Blue River</u>	Robert Hrubes, Brian Hefty (Wyalusing Property Supervisor), Ryder S. Will, (Wyalusing SP); Bradley M. Hutnik (DNR Forester),

	<u>Bottoms) and Wyalusing State Park</u>	William L Carlson (Forestry Team Leader)
<u>August 13, 2009</u>	<u>North East Regional Headquarters</u>	<p>Mike Ferrucci Curt Wilson, Regional Forestry Leader Jeff Pritzel, Regional Wildlife Supervisor Joe Henry (Regional Ecologist), Arnie Lindauer, Regional Park Supervisor Shelley Wrzochaski, Forester Dick Nikolai, Wildlife Biologist Ron Jones, Lakeshore Area Forestry Team Leader John Lubbers, Regional Forestry Staff Sup</p> <p><u>Wausaukee Office</u> Mike Folgert, Area Forestry Leader) Cole Couvillion, Forestry Team Leader-Wausaukee Dave Halfmann, Wildlife Biologist), Aaron McCullough, (Wildlife Tech), Craig Leitzke, Facilities and Lands Tech LTE); Bruce Djupstrom, Forester/Ranger Pembine Kate ----, Area Forestry Specialist Many individuals from the first two meetings continued on for the field sites.</p>
	<u>Peshtigo River State Forest</u>	<p>Mike Ferrucci Dan Mertz (PRSF Property Manager)</p>
	<u>Tomahawk, WI.</u>	<p>JoAnn Hanowski Bob Mather, Tom Duke (Regional Forestry Staff Supervisor), Gary Bartz (Facilities and Lands Field Manager), Jeff Olsen - (State Forest Management Supervisor), Steve Ave'Lallemant (Fisheries Supervisor), Paul Bruggink (Facilities and Lands Supervisor), Bill Smith (Regional Lands Leader), Dawn Bishop (State Park Superintendent), Chuck McCullough (Antigo Area Lands Supervisor), Rick Weide (Wildlife Mgmt), Drew Feldkirchner (ER/Forestry), Brian Spencer, Mark Aquino (Land Division), Laurie Osterdorf (Land Division), Andy Shaney (Forestry Tomahawk), Mike Lietz (Forestry Merrill).</p>
	<u>Menard Island Resource Area</u>	<p>JoAnn Hanowski Most of all from above list from Tomahawk</p>
	<u>Wolf River Fisheries Area</u>	<p>JoAnn Hanowski Most of all from above list from Tomahawk</p>
	<u>Peters Marsh Wildlife Area</u>	<p>JoAnn Hanowski Most of all from above list from Tomahawk</p>
	<u>LaCrosse - Area Office</u>	<p>Robert Hrubes, Kris Belling (Wildlife Regional Program Manager), Tim Babros (Wildlife Area Supervisor), Jean Rygiel (Parks Regional Program Manager), Joe Stecker-Kochanski (Buckhorn SP Manager), Armund Bartz (ER Conservation Biologist), Dave Vetrano (Fisheries Team Supervisor), Craig Thompson (Regional Land Leader), Arvid Haugen (West Central Regional Forester). Greg Edge (Area Forestry Leader - La Crosse)</p>
	<u>Coon Creek Fishery Area (Neprud property project - Vernon County), Jersey Valley</u>	<p>Robert Hrubes and most others from above list.</p>

	<u>property (State owned but operated by Vernon County -- Wildcat Mountain SP- Ontario; Mill Bluff State Park in Monroe County</u>	
August 14,2009	<u>Black River State Forest</u>	Robert Hrubes Mike Ferrucci JoAnn Hanowski Jennifer Boice, Forester, BRSF Teague Prichard, State Forest Specialist Tom Duke, NOR Region Randy Hoffman, SNA Ecologist Bob Mather, Bureau of Forest Management Paul Pingrey, Forest Certification Coordinator Drew Feldkirchner, Endangered Resources/Forestry Allan Crossley, Public Lands Specialist—Wildlife Adam Wallace Forester, BRSF Armund Bargz, WCR Ecologist Kate Fitzgerald, Facilities and Lands Coordinator

Field Sites Visited:

Mike Ferrucci's Field Sites:

Wednesday August 12, 2009

Stop 1: Glacial Habitat Restoration Area, Hull Property 44, Wetland Restoration

Stop 2: Glacial Habitat Restoration Area, Hull Property 44, Sale 7103 – Pending harvest mostly aspen with some green ash and box elder to regenerate aspen stands.

Stop 3: Mullet Creek Wildlife Area, Sale 2070-7 – Completed harvest including selection in mixed hardwood (Sugar Maple and Oak) and clearcut of Aspen.

Stop 4: Collins Marsh Wildlife Area, Sale 3622 – Planned harvest of a poletimber red maple stand on a seasonally-flooded site. Concerns about invasive reed canary grass.

Stop 5: Point Beach State Forest, Sale 3672 – Completed harvest in pine plantations, including removal of most Scotch pine, and thinning of extensive Red pine plantations.

Thursday August 13, 2009

Stop 1: Menominee Natural Resources Area – Old Growth Reserve and Managed Old Growth planned harvest –
Planning for proposed harvest to enhance managed "old-growth"; pine plantation section

Stop 2: Menominee Natural Resources Area – Old Growth Reserve and Managed Old Growth planned harvest –
Planning for proposed harvest to enhance managed "old-growth"; natural stand section

Stop 3: Pemene Falls Hiking Trail: trailhead, trails, Menominee River

Stop 4: Peshtigo River SF, Block

House Sale 3810-05: partially completed harvest

4A – 20 acres completed clearcut with reserves in declining, poor quality scrub oak stand.

4B – Marked thinning surrounding the site of a group camp shelter to be built soon (funded)

Stop 5: Peshtigo River SF, Kirby Lake Hardwoods: Area 8 (of 8 areas in the Peshtigo River SF Management Plan) is a “Native Community Management Area” most of which is a designated State Natural Area, and portions are to be actively managed as a comparison. The boundaries of the SNA include a red pine plantation (marked) that doesn't fit the SNA description; the boundary of the SNA will be adjusted to remove the plantation and allow it to be thinned.

Stop 6: Riverside Trail – ski trail and trailhead/parking.

JoAnn Hanowski's Field Sites:

Wednesday, August 12, 2009

Quincy Bluff and Wetlands. Three stops to look at status of pine barren restoration. The difference between the three harvest sites was the presence/absence of tornado damage that affected the management at the sites. Three timber sales occurred on the unit (QB1, QB2, QB3), one before the tornado, one after and the other was a salvage harvest.

A fairly large area with good cooperation and coordination of efforts with TNC who owns adjacent property. The bluff areas were important indigenous use areas and there is some known history of native use in the area. The area was designated an SNA in 1993 but does not have a current plan. The long term goal is to maintain pine barren habitat with fires

Roche-a-cri State Park. The Park is working off a 1977 management plan. We viewed the Native American petroglyphs and pictographs and took the stairs to the top of one of the 300 foot rock outcroppings. We looked at a marked timber sale that will be harvested this November (Sale # 0140-03). The sale was put up to reduce the impact of gypsy moth damage in the Park and to increase the age structure and diversity. Goal is to regenerate oak by removing the basal area to 15ft²/acre. Talked about sensitivity of harvests in State Parks to the public. The friends group here has signed off on the plan for the harvest that occurs along one of the trails in the Park. A riparian area RMZ has been established along a small trout stream.

Emmons Creek Fishery Area Personnel: This area does not have an up to date plan-the last plan was dated 1982. Previous plan did not include management for the Karner Blue

Butterfly which is a big emphasis for current management. Fisheries has done some stream improvement projects which have been effective in improving fish habitat. Surveys will be conducted later this month to document fish in the restoration area. This area has a lot of invasive species problems that are hard to deal with. Lots of garlon use and they are using the invasive species handbook. They have put out some bugs for spotted knapweed bio-control. Harvest Tract 4-2008 has been marked, not cut.

Visited a marked timber sale that will create more Karner blue butterfly habitat, removal of a small pine plantation, and oaks to connect critical habitat; harvest will be done on the SNA. Saw butterfly survey points and an actual butterfly!!

Thursday, August 13, 2009

Menard Island Resource Area. This 1674 acre parcel protects 5.6 miles of Wisconsin River Frontage and over 800 acres of scenic easements it does not have a current master plan. ATV are a problem in the area, primarily due to lack of enforcement. Looked at 3 year old harvest site. Good green retention and regen.

Wolf River Fisheries Area. This property has a 1978 master plan and is included in a Tier 2 plan. It is 11-12,000 acres in size and about 65% of the area is in non-forest habitat. Have received some monies to do alder management for woodcock. Stopped at one area where they are doing grassland management for rare and threatened grassland bird species (saw a northern harrier).

Stop 2 was at a seep pond that was dredged. This region of WI has the largest number of these ponds in North America. Dredging removes sediments and increases spawning habitat for trout. Before and after surveys are conducted for fish populations. An EA is completed before each project is initiated. Stop three was at a red pine plantation that is marked for thinning (4th entry). An rmz was left along the Wolf River. Lack of long range planning, vision for this stand.

Peters Marsh Wildlife Area. This 1687 acre property includes a variety of habitat types. Observed that DNR personnel had planted GMO soybeans. A visit to a timber harvest in a northern hardwoods site appeared to be successfully completed. Discussed protection of vernal ponds during harvest and found that staff are aware of the need for protection. DNR should accelerate their work on developing management guidelines (BMP's) for this special resource.

Friday, August 14, 2009 (Ferrucci, Hanowski and Hrubes)

Stop 1. An ATV trail that had been recently worked on to fix several wetland crossings on one of the most popular trails on the Forest. Staff have identified 39 problem areas and thus far, they have enough resources to fix 14 of the sites. Need more money for enforcement and more money to fix and repair trails.

Stop 2. Pine Barrens restoration for Kirtland's Warbler habitat. Two warblers have been identified on the area. Plan is to provide matrix of jack pine habitat in three age classes about 80 acre patch sizes.

Stop 3: 56 acre jack pine site that was harvested before the green retention BMP's were in place. The site was aerial seeded and there is good regeneration; will do a mechanical release if necessary.

Stop 4; Timber sale 1086- harvest of 50 year old jack pine stand with many residual white and jack pine. Logger did good job, little rutting or soil compaction or residual tree damage.

Stop 5. ATV trail that has been repaired. 40-60 foot wide area and big puddles. Should have all fixed by 2011.

Stop 6. Jack pine barrens restoration site for Karner Blue done with a fecon mower. Saw a few Karner Blues.

Robert Hrubes' Field Sites:

Tuesday, August 12, 2009

3 field stops Lower Wisconsin State Riverway (Peck's Landing, WP&L, Blue River Bottoms) and Wyalusing State Park

Wednesday, August 13, 2009

Coon Creek Fishery Area (Neprud property project - Vernon County), Jersey Valley property (State owned but operated by Vernon County -- Recreational issues, dam failure, and a timber sale), Wildcat Mountain SP-Ontario; Mill Bluff State Park in Monroe County.

6.1.4 Status of 2008 Corrective Action Requests Based Upon the 2009 Surveillance Audit

Note: All text in the cells below associated with "Accomplishments for 2009 surveillance audit" was submitted to SCS by Wisconsin DNR on August 5, 2009. Documents referenced via imbedded electronic links in the DNR responses are not accessible in this certification report but they are on file at the SCS offices and can be obtained upon request to DNR.

<p>Background/Justification: FSC Principle 7 requires that management of certified lands be guided by management plans that are "written, implemented and kept up to date." The WDNR has made substantial progress toward planning for the strategic development of Master Plans for state managed properties by using a well-structured 3-tiered approach. In the interim as plans are being developed, the WDNR needs to institute measures for maintaining the currency of operational components of outdated plans and/or providing operational guidance for Tier 1 and Tier 2 properties that lack a plan. These efforts should include correlating the annual work plans with the master plans or other guidance</p>

documents and addressing the management plan requirements of Principle 7.	
CAR 2008.1	By the time of the first annual audit after award of certification, WDNR must develop protocols and make substantial progress in developing key operational components of the Master Plans for state-managed properties that will not be undergoing a full re-planning within the next 5 years. Key components to develop include: management objectives for each property (by individual tract or groups), descriptions of the natural resources to be managed, the management systems to be used, and any unique considerations for the property. Updates should be made publicly available (e.g., through updates to property websites).
Deadline	2009 annual audit
Reference	<i>FSC Indicators 7.1.a.2, 7.2.a., 7.3.a</i>
Accomplishments for 2009 surveillance audit (presented to the audit team on August 5th)	<p><i>“Kate Fitzgerald - Lead</i></p> <ul style="list-style-type: none"> • Protocols and guidance are in place to assure projects and operational activities specified in annual work plans support the master plan, or the stated management objectives of the properties. Management activities are also constrained by the requirements of statute, administrative code, and federal funding (SFR/PR/LAWCON) requirements. Numerous Manual Codes and other program policy provide guidance and consistency to property operations. • The DNR Internet is being used to document current management objectives and provide the other information required in CAR2008.1. Specific progress to date: <p>The Bureaus of Wildlife Management, Endangered Resources, and Parks are enhancing their existing property page descriptions where needed to include the required key components identified in the CAR.</p> <p>A new "gateway" page has been created for fishery properties since fishery properties did not have information about each individual property on the internet. The write-ups for each property include (or will include) the key components identified in the CAR as well as other basic property information. Data has been collected for 115 fishery properties so far. It is anticipated that some of those will be posted by the time of the audit.</p> <p>Information has been added to the master planning internet page directing people to the property pages referenced above. This provides another source of information for the properties, so that property objectives, prescriptions, maps, and contacts are readily available even if there is no recent master plan.</p> <p>Although the CAR only required action for those properties not undergoing a full re-planning within the next 5 years, due to the value of providing this information to our customers, we are creating or enhancing our property information pages for all Land Division properties that require a master plan</p>

	In addition, the programs are working together to find a common "home" for all DNR properties on DNR's Internet site regardless of the type of property. There is wide spread recognition that the current website is not very user-friendly in its organization related to finding information about the properties."
Additional Documentation	<p>“See attachments in this e-mail from Alan Crossley for a couple property examples and Wildlife’s schedule for completing Tier 1 and 2 plans.</p> <p>WI DNR Property Master Planning Internet Home Page”</p>
Auditors’ Response	<p>Although the Department made progress collecting survey information from property managers, accomplishments were variable by bureau and in almost all cases incomplete. The CAR also required that the information be made available to the public via the web, but very few of the Internet property pages have actually been revised.</p> <p>We conclude, therefore, that insufficient progress has been made by the Department to warrant closure of this CAR. Per FSC protocols, it is required to elevate this issue to a Major Corrective Action Request—see Major CAR 2009.1.</p>

Background/Justification: The WDNR has developed a plan for completing Master Plans for Tier 1 and Tier 2 properties. There is a 10-12 year timeframe for the process of developing these plans. This timeframe should be accelerated as much as possible and training efforts should be planned to accompany plan implementation.	
CAR 2008.2	The WDNR must provide an update on progress toward the Master Planning goals on an annual basis as well as the training programs for supporting plan development and implementation.
Deadline	2009 annual audit
Reference	<i>FSC Indicators 7.1.a.2, 7.2.a., 7.3.a</i>
Accomplishments for 2009 surveillance audit (presented to the audit team on August 5th)	<p>“<i>Kate Fitzgerald - Lead</i> <u>Update on Progress Toward Master Planning Goals</u> Response to CAR 2008.2 Accomplishments since last Certification audit (September 2008)”</p>
Auditors’ Response	An update on the Department’s progress in developing new Master Plans was provided as part of the 2009 surveillance audit. There has been good progress on completing Tier 2 plans over the past year. As well, some Tier 1 plans have also been completed. While the time frame for achieving a status where all properties have “current” Master Plans has been pushed back due to budget realities, we are satisfied that the Department is earnestly working to make progress to the maximum extent allowed under present funding limitations and that acceptable progress is being made. As such,

	<p>we conclude that closure of this CAR is warranted. The Department is advised that Master Planning will be within the scope of all subsequent surveillance audits and that it will be expected that an update is provided to the auditors in conjunction with future surveillance audits.</p> <p>CAR 2008.2 is now CLOSED.</p>
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<p>Background/Justification: The WDNR has implemented a process for State Forest Master Plan Monitoring and Evaluation Reporting. The Master Plan monitoring process needs to be expanded to include those properties managed by the Division of Land. The expanded Master Plan Monitoring and Evaluation reporting process should also be supported by training or additional guidance that increases consistency in the reporting and more clearly links accomplishments with management objectives and goals.</p>	
CAR 2008.3	<p>By the next annual audit, Wisconsin DNR must develop and apply a property plan implementation and monitoring reporting template and instructions in order to expand the Master Plan monitoring and evaluation reporting procedures to include properties administered by the Division of Land and provide evidence of training or guidance that provide direction on how to complete the reporting in a manner that links to the management objectives and quantified progress toward goals.</p>
Deadline	2009 annual audit
Reference	<i>FSC Indicator 8.1.b</i>
<p>Accomplishments for 2009 surveillance audit (presented to the audit team on August 5th)</p>	<p><i>“Tom Watkins & Kristin Shy - Lead</i> <i>“The ad hoc Master Plan Monitoring Working Group members include Tom Watkins, Kristin Shy, Jeff Prey and Kate Fitzgerald.</i></p> <ul style="list-style-type: none"> • An ad hoc team chose to use the State Forest monitoring report template, instructions and example report for application on other DNR lands. The objective is to have one standard, baseline master plan monitoring template and instructions for the whole Department. The State Forest template and instructions will apply to all Department properties. • State Forests updated the template with directions to tie accomplishments back to objectives (see attached document, below). ...Don't report that you had a timber sale, but explain how that timber sale accomplished the management objective for that area. • State Forests completed monitoring master plan implementation for the calendar year of 2008. Exempt properties, due to involvement in an active master planning process are, Black River State Forest, Coulee Experimental State Forest, and Flambeau River State Forest. • Flambeau River State Forest is assessing the option of placing their monitoring plan as an appendix of their new master plan. The Master Plan Technical Team will discuss the specifics. • Monitoring reports are in the process of being posted online for open and transparent information sharing for the public. They will be updated annually. • The ad hoc monitoring working group is developing a Manual Code on master plan monitoring to assure the monitoring tools are used consistently. The Manual Code will be ready by January 2010.”

<p>Additional Documentation</p>	<p>“Master Plan Monitoring Memo and Attachments: Land Bureaus will also continue traditional accomplishment reporting as shown in this Wildlife Bureau example:”</p>
<p>Auditors’ Response</p>	<p>Based upon our review of the materials put forward in the Department’s response to this CAR and based upon our discussions with DNR staff during the 2009 surveillance audit, we must conclude that almost no substantive progress was actually accomplished on this CAR over the past year. Although the Land Division bureaus have individual accomplishment reporting systems, they are not adequate for capturing information related specifically to master plan implementation.</p> <p>Accordingly, and per FSC protocols, we must elevate this issue to a Major Corrective Action Request—see Major CAR 2009.2.</p>

<p>Background/Justification: The WDNR, Division of Forestry, has developed a written crosswalk between High Conservation Value Forest (HCVF) requirements found in P.9 and DNR’s approach to identifying and managing areas of high conservation value. This crosswalk needs to be expanded to address state properties administered by the Division of Land that are within the scope of this certification evaluation.</p>	
<p>CAR 2008.4</p>	<p>By the time of the first annual audit, the Division of Land must update the HCVF crosswalk to include properties it administers. This expanded crosswalk must demonstrate that management of all DNR-administered properties within the scope of this certification evaluation meets the HCVF requirements set forth in Principle 9.</p>
<p>Deadline</p>	<p>2009 annual audit</p>
<p>Reference</p>	<p><i>FSC Indicator 9.3.a</i></p>
<p>Accomplishments for 2009 surveillance audit (presented to the audit team on August 12th)</p>	<p>“Randy Hoffman - Lead Completed as shown in the attachments.”</p>
<p>Auditors’ Response</p>	<p>An expanded HCVF crosswalk was provided, as requested, that incorporates Division of Lands procedures and processes that map (cover) the HCVF requirements codified in FSC Principle 9. The expanded crosswalk clearly demonstrates that Lands division procedures very extensively seek to identify and appropriate manage areas that possess high conservation values.</p> <p>During the 2009 surveillance audit, the auditors observed that the expanded crosswalk did not fully articulate the extent to which Lands Division personnel consult with external experts and stakeholders in the identification of high conservation values and the appropriate management prescriptions for areas possessing high conservation values. On September 18th, a revised and further augmented crosswalk was conveyed to the SCS Lead Auditor. This revised crosswalk provides additional detail on consultative efforts in the context of management of high conservation values.</p>

	<p>On the basis of the information supplied to the auditors, at the time of the field audit and subsequently, we conclude that closure of the CAR is now warranted.</p> <p>CAR 2008.4 is now CLOSED.</p>
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<p>Background/Justification: The WDNR has developed guidelines for biomass harvesting that include woody debris retention and recruitment standards. The guidelines were in the public review process at the time of the September 2008 assessment.</p>	
<p>CAR 2008.5</p>	<p>At the time of the first annual audit, the WDNR must update SCS on the status of the implementation of the guidelines. If the guidelines are not approved and disseminated in a timely manner the WDNR will need to identify an alternative approach to address woody debris retention in the context of biomass harvesting operations on properties included in the scope of this certification evaluation.</p>
<p>Deadline</p>	<p>2009 annual audit</p>
<p>Reference</p>	<p><i>FSC Indicators 5.3.a, 6.3.b, and 6.3.c</i></p>
<p>Accomplishments for 2009 surveillance audit (presented to the audit team on August 5th)</p>	<p><i>“Paul Pingrey - Lead</i></p> <p>The BHG Implementation Plan was accepted by the Council on Forestry at its March 17, 2009 meeting. Below are three documents that summarize the Implementation Plan process: 1) A summary report of the Implementation Plan; 2) An implementation calendar and write-ups of individual implementation elements that provide additional details to supplement the summary report; 3) Summarized and full-text comments received from stakeholders about the implementation plan.</p> <p>The DNR Secretary accepted the BHG implementation plan. The Land and Forestry Divisions are following through.”</p>
<p>Auditors’ Response</p>	<p>As requested, an update was provided to the audit team during the surveillance audit. New biomass harvesting/retention guidelines have been duly developed and approved. DNR has developed and is following through on an extensive roll-out plan for implementing the guidelines and new timber sale contracts now incorporate the guidelines.</p> <p>On the basis of the evidence provided, the audit team concludes that closure of this CAR is now warranted.</p> <p>CAR 2008.5 is now CLOSED.</p>

<p>Background/Justification: The WDNR has inconsistent guidance regarding the training and licensing requirements for chemical pesticide applicators. The FSC Lakes States Regional Standard also requires that an up-to-date list of all chemical pesticides being used on WDNR-managed properties is provided to the certification body to confirm compliance with the FSC Pesticides Policy; that is, to confirm that no chemicals on the FSC prohibited list are in use on certified properties. It is also required that land managers employ integrated pest management and other strategies that effectively minimize the use of chemical pesticides.</p>	
<p>CAR 2008.6</p>	<p>The WDNR must provide evidence of clearly communicated chemical</p>

	pesticide training and licensing requirements and implement training programs, as needed. The WDNR must also provide an up-to-date complete list of chemical pesticides being used on properties within the scope of the certification evaluation. The WDNR must provide evidence of an integrated pest management policy or other strategies that result in the reduction, avoidance, and minimization of chemical pesticide use.
Deadline	2009 annual audit
Reference	<i>FSC Indicator 6.6.b</i>
Accomplishments for 2009 surveillance audit (presented to the audit team on August 5th)	<p><i>“Kelly Kearns and Tom Boos – Leads</i> <i>Ad hoc Pesticide Working Group members/advisors: Kelly Kearns, Tara Bergeson, Tom Boos, Kate Zurlo-Cuva, Carol Schweiger, Rebecca Schroeder, Matt Zine, Joe Vande Hey, Erin Crain, Paul Cunningham.</i></p> <ol style="list-style-type: none"> <u>Inconsistent guidance regarding the training and licensing requirements for chemical pesticide applicators. Provide evidence of clear communication about this and implement training programs as needed.</u> <ul style="list-style-type: none"> The Department currently follows all DATCP requirements for certification and licensing and will continue to do so. The Forestry Division currently has a more specific standard that is being considered for incorporation into a Department-wide policy (see proposed Intranet page – Appendix A). The Department Integrated Certification Implementation Team (ICIT) has developed an Intranet webpage as an easily accessible resource on DNR pesticide use issues. The content of the webpage is below as Appendix A. The ICIT is reviewing other Manual Codes that address chemical use and plan changes for clarification of the policy. An issue brief regarding policy revisions will be submitted to the Division leadership teams for consistency and agreement from the top down. <p><u>Training-</u></p> <ul style="list-style-type: none"> The ICIT ad hoc pesticide team developed a draft training plan – see Appendix B. There have been two regional (SER, NER) training sessions that covered safety, certification, and details of specific herbicides. Staff is interested in conducting similar training in the other regions. The Department is has developed fact sheets for many invasive plant species (http://www.dnr.state.wi.us/invasives/plants.asp), which include the best known information on which herbicides to use and methods to apply them with minimal non-target impacts, as well as all other known control techniques. The ICIT will utilize the DNR Digest, the Intranet and direct email to provide updates to DNR staff in order to broadly disseminate information on herbicides and other control methods. Currently there are regular reminders about pesticide safety sent out in some of the regions. <ol style="list-style-type: none"> <u>Maintain an up-to-date list of all chemical pesticides being used on WDNR-managed properties</u> <ul style="list-style-type: none"> The existing database tracks chemical use and can be

queried by chemical name. It can be found at:

<http://wiatri.net/projects/chemuse/>

- The list of chemical pesticides used since May 30, 2005 is listed below in Appendix C.
- Although the database exists and is required to be filled out, a review suggests that not everyone is using it. The ICIT is therefore developing an improved approval/use-recordkeeping system to compel staff to use the database.

3. Ensure that no chemicals on the FSC prohibited list are in use on certified properties

- Pesticide training sessions and the Intranet Pesticide Use webpage clearly identify FSC prohibited chemicals.
- The webpage described above contains the most recent list of prohibited chemicals for easy reference.
- The ICIT and supervisors check the database for any use of prohibited chemicals.
- Supervisors will be alerted of any use of a FSC prohibited chemical to ensure future compliance.
- Since May 2005, there were four instances of prohibited chemical use in the database. All occurred prior to DNR Land being FSC certified on January 13, 2009 certification date. The incidents:
 1. Simazine- used on agricultural land by sharecropper on Riverway property, May 2008. Share crop fields are excised from DNR's certified land and so use there is not an issue.
 2. Simazine- used on plantation by hired applicator on state park land, May 2008. Contracts will now specify that FSC-prohibited pesticides may not be used.
 3. Simazine- used on plantation by staff on wildlife area property, October 2008. DNR policies have been updated to prohibit use of FSC-designated highly-hazardous pesticides.
 4. Atrazine- used on agricultural land by sharecropper on wildlife property, May 2008. Share crop fields are excised from DNR's certified land and so use there is not an issue.

4. Provide evidence that land managers employ integrated pest management and other strategies that effectively reduce, avoid and minimize the use of chemical pesticides

- Manual Code 4230.1 describes and requires IPM techniques. The DNR Pesticide Use Intranet page will allow staff to easily understand and reference the policy. The DNR Forest Health Internet includes instructions on developing an IPM plan.
- The Invasive Species Fact Sheets include alternative control techniques that can be used instead of pesticides. The web-based resource is replacing 1990's printed fact sheets for invasive species.
- Department silvicultural practices and property management practices include procedures to prevent and avoid pest

	<p>problems that might require pesticide treatment. For example, see practices related to EAB and Gypsy moth “slow the spread”.</p> <ul style="list-style-type: none"> ○ There are several bio-control programs the Department is involved in, including programs for purple loosestrife, spotted knapweed, leafy spurge and garlic mustard. ○ The use of post prescribed burn reports can be used to determine effectiveness of burning. ○ The proposed Invasive Species Rule, NR40, includes much training for DNR staff, targeted stakeholders such as landowners and managers, and the public. These will certainly include control discussions. <p>5. <u>DNR needs a manual code establishing uniform policy on pesticide use and training.</u></p> <ul style="list-style-type: none"> ○ Such a manual code currently exists (4230.1). The Department will work on clarifying it, consider any updates and interpret in plain language on the abovementioned webpage. The specific manual codes are attached in Appendix A below.”
<p>Auditors’ Response</p>	<p>A complete list of chemicals used on the lands within the scope of the certificate was provided to the audit team during the 2009 surveillance audit.</p> <p>The auditors recognized that DNR has completed a substantial amount of responsive work in draft form that provides potential evidence to warrant closure of this CAR. However, the policies have not been finalized and the training has not been deployed. As such, we cannot conclude that sufficient progress has been made to warrant closure. It remains necessary for the additional guidelines to be promulgated as either Manual Code or a Directive.</p> <p>Accordingly, and per FSC protocols, we must elevate this issue to Major Corrective Action Request—see Major CAR 2009.3.</p>

<p>Background/Justification: The FSC Lake States Regional Standard requires that when conflicts between legal mandates and conformance with the FSC Principles and Criteria occur that such conflicts are referred to the appropriate FSC body for guidance and resolution. To comply with this requirement it is necessary that responsible parties including field staff have sufficient familiarity with the FSC standard to be able to recognize potential conflicts and that guidance is provided regarding reporting mechanisms. Certification training should be provided to staff consistent with their roles and may include the use of information tools, handbook revisions and other delivery mechanisms or approaches.</p>	
<p>CAR 2008.7</p>	<p>The written commitment must be conveyed to SCS that WDNR will bring any conflicts between applicable laws/regulations and the FSC certification standard to the attention of FSC/SCS. This commitment must be supported by actions aimed at improving relevant DNR employees’ familiarity with the FSC Lake States Regional Standard including providing ready access to the full standard.</p>
<p>Deadline</p>	<p>2009 annual audit</p>
<p>Reference</p>	<p><i>FSC Indicator 1.4.a</i></p>
<p>Accomplishments for 2009</p>	<p><i>“Paul Pingrey - Lead</i></p>

<p>surveillance audit (presented to the audit team on August 5th)</p>	<p>DNR Manual Code 2406.1 on Forest Certification was submitted for the Secretary’s approval on June 11, 2009. The MC adoption process involves a 60-day Regional review, which will be concluded soon when we expect Secretary approval. The MC affirms the agency’s commitment to FSC conformance and directs agency personnel to bring any conflicts between the FSC standard and DNR’s policies to the attention of the CB. The Manual Code formally establishes an Integrated Certification Implementation Team, identifies the role of the Certification Coordinator, and explains the ICIT relation to the Division leadership teams (LLT and FLT).</p> <p>A few of the certification awareness activities in the last year:</p> <ul style="list-style-type: none"> ○ Development of a certification training toolkit on the Land Division Intranet ○ Distribution of FSC-US, FSC-IC and SFI standard revision documents to DNR staff. Meetings and conference calls for staff to contribute comments on the revisions ○ News releases and press conferences related to DNR certification ○ Forest Certification presentation at the January 2009 Statewide Wildlife Meeting in Appleton ○ Distribution of ICIT meeting minutes ○ Certification presentations and updates at Division leadership meetings ○ Preparation of SAF Certification Working Group newsletters (Pingrey is chair), which are shared with DNR staff. ○ A Tri-State meeting of Wisconsin, Minnesota and Michigan DNR Secretaries held in April 2009 to discuss forest certification and future opportunities to collaborate on common issues.”
<p>Auditors’ Response</p>	<p>During the mid-August surveillance audit, we learned that the new Manual Code had, in fact, received Secretary approval (subsequent to the DNR’s written response to this CAR). The new Code makes substantial changes that collectively increase the Department’s commitment to FSC forest management certification. Additionally, and as is detailed in the DNR’s written response above, there have been numerous additional actions that have been taken that increase DNR’s overall involvement in and knowledge of the FSC certification requirements, thereby enhancing the Department’s ability to identify situations of conflict (with legal requirements) were any to arise.</p> <p>For these reasons, the audit team concludes that closure of this CAR is now warranted.</p> <p>CAR 2008.7 is now CLOSED.</p>

<p>Background/Justification: The FSC Lake States Regional Standard requires the protection of threatened, endangered, of special concern, or sensitive species and their habitats. A key step to complying with this requirement is the use of a robust Natural Heritage Inventory (NHI) database that is inclusive and kept up to date. The WDNR must ensure that land managers are provided the most current NHI data possible and that where a backlog in data entry occurs land managers must still be able to access records of occurrences and/or expert advice. To the extent practical, staff and resources should be reallocated to address the data entry backlog. The WDNR must also ensure that all recorded occurrences (including those not yet entered in the database) are included in Master Plan development and operational planning.</p>	
<p>CAR 2008.8</p>	<p>By the time of the first annual audit, the WDNR must provide a report on the status of the data entry backlog, efforts that are underway to address the backlog (including collaborations with stakeholders), and evidence of guidance that addresses the procedures land managers must use to access the most current records and information and details for how this procedure is used for Master Plan development and operational planning.</p>
<p>Deadline</p>	<p>2009 annual audit</p>
<p>Reference</p>	<p><i>FSC Indicator 6.2.e.</i></p>
<p>Accomplishments for 2009 surveillance audit (presented to the audit team on August 12th)</p>	<p>“ER Management Team- Lead (Drew Feldkirchner – contact)</p> <p>1. “provide a report on the status of the data entry backlog”</p> <p>The department’s commitment to support master planning efforts, along with several new grants, has significantly increased DNR’s capacity to map new rare species and community records into the NHI database. Based on currently available staff and funding, mapping efforts for each of the next two fiscal years are projected to be 160% higher than FY09 mapping efforts. This is much better than previously anticipated, given the state’s severe budget deficit. Significant progress has already been made in reducing the backlog; for example, the backlog for animal records was reduced by 62% since this time last year. The future ability to incorporate NHI information in a timely manner will continue to depend on available funds.</p> <p>2. “efforts that are underway to address the backlog (including collaborations with stakeholders)”</p> <p>New rare species records are being incorporated into the NHI database (“mapped”), with the following records given the highest priority: 1) records for Threatened or Endangered species, 2) records collected for state properties that are either in the process or soon to undergo master planning, and 3) other records as resources allow. Top priorities for natural community data are records needed to support master planning and other exemplary natural community examples that do not meet these criteria but are high priority candidates for State Natural Area designation.</p> <p>The department initiated pre-master planning work for a number of state lands, including biotic inventory work conducted by NHI. Thirteen properties were surveyed in 2008 and another 23 are being surveyed in 2009-2010. Since biotic inventory budgets for this work include mapping costs, backlogged records will be mapped along with new records,</p>

	<p>resulting in the most current data possible for these properties. This work is planned to continue concurrent with the department master planning schedule in the hopes of providing the best available information for developing property master plans.</p> <p>The NHI Program secured several State Wildlife Grants, as well as other federal funds, to support further mapping and data backlog reduction. Grant funds will cover the costs of mapping all NHI working list plants, animals, and high quality Natural Community occurrences in NHI tracking databases that were documented on Conservation Opportunity Areas (COAs) ranked as globally or continentally significant (COAs were delineated during the implementation phase of the Wisconsin Wildlife Action Plan. See dnr.wi.gov/org/land/er/wwap/ for more information).</p> <p>3. “evidence of guidance that addresses the procedures land managers must use to access the most current records and information...”</p> <p>The Bureau of Endangered Resources will continue to notify property managers of newly located species / community occurrences identified through ongoing inventory efforts. The NHI Program develops Biotic Inventory Reports (for some properties they are “Rapid Ecological Assessments”) for each property surveyed in support of master planning. These documents provide information related to rare species and high-quality communities for use by master planning teams, highlighting the most important opportunities for conserving biological diversity (e.g., http://dnr.wi.gov/org/land/er/nhi/projects/state/flambeau.htm). In the interim period prior to report development and final data mapping, communications are sent directly to managers notifying them of new species or communities that have been documented and encouraging them to work with their Regional Ecologists to interpret this information and utilize it as part of adaptive management strategies (see example below).”</p>
Additional Documentation	<p>“A sample memo that is routinely sent to property managers to alert them about new NHI occurrences:”</p>
Auditors’ Response	<p>Evidence provided by DNR, in the judgment of the audit team, constitutes an earnest and effective response to this CAR. The NHI backlog has been substantially reduced and new procedures should assure that the remaining backlog is eliminated in an appropriate time frame. Accordingly, we conclude that closure of this CAR is warranted.</p> <p>CAR 2008.8 is now CLOSED.</p>

Background/Justification: The FSC Lake States Regional Standard requires that the use of exotic/non-native species be informed by a risk assessment conducted prior to their use.	
CAR 2008.9	The WDNR must demonstrate that risk assessments for the use of exotic/non-native species (such as in seed mixes for erosion control and other management applications) are completed prior to such use.

Deadline	2009 annual audit
Reference	<i>FSC Indicator 6.9.b</i>
Accomplishments for 2009 surveillance audit (presented to the audit team on August 12th)	<p><i>“Alan Crossley & Kelly Kearns - lead</i></p> <p>Risk assessments for non-native species were completed as part of Chapter NR 40 Relating to Invasive Species Classification & Regulation. See the Assessment Summary Tables on-line:</p> <ul style="list-style-type: none"> • Terrestrial Plants • Aquatic Plants • Vertebrates • Terrestrial Invertebrates & Plant Disease-causing Microorganisms • Fish & Aquatic Invertebrates <p>The ICIT (Crossley lead) also conducted a survey of DNR land managers regarding seed mixes they use. Seed contents can be appraised with the above terrestrial plants assessment and through data on Nature Serve. The ICIT is developing a follow-up Manual Code advising appropriate seed mixes and caution to evaluate seed mix content.</p>
Auditors’ Response	<p>The requested risk assessments have been completed and the Department has elevated its attention to the issue of unintended introduction of invasive non-native species when using management tools such as seed mix for erosion control.</p> <p>The audit team concludes that closure of this CAR is warranted.</p> <p>CAR 2008.9 is now CLOSED.</p>

2008 Observations:

Observation 2008.1: Field visits during the September 2008 evaluation resulted in observed instances of contractors having first aid kits and spill kits kept in vehicles at the landing and not at the active harvest site. Training should emphasize the importance of health and safety materials being kept in multiple locations and/or with the operators and equipment.

DNR Response: The Wisconsin SFI Training Standard adopted by the SIC requires logging training that is OSHA compliant. The training is provided by Game of Logging (GOL) certified contractors and Forest Industry Safety and Training Alliance (FISTA). Wisconsin DNR, however, is not authorized under state statutes to be an OSHA administrator. Non-conformances to OSHA standards are discovered by logging inspections conducted by the Wisconsin Department of Commerce.

Auditor Comments after 2009 Audit: DNR’s response is helpful and suggests that this issue is now less likely to constitute a non-conformity in the future. A question for the Department: can DNR personnel bring OSHA non-conformances to the attention of the Department of Commerce if, during normal field activities, non-conformities are observed?

Observation 2008.2: The WDNR has made significant efforts to ensure that road, trail and other transportation systems on state managed lands are designed to required standards. However, this level of performance cannot be maintained without adequate and reliable dedicated funding and staff. There is currently no secure funding source for road maintenance, leading to auditor concerns about the frequency of road maintenance treatments (such as grading) and BMP compliance.

DNR Response: DNR requested and received an additional \$2 million annually in the state budget for road maintenance and repair on DNR lands.

Auditor Comments after 2009 Audit: We take positive note of the DNR's success in securing additional funding for road maintenance and repair which will hopefully enhance the Department's ability to enhance its demonstration of conformance to the FSC certification standard in future years.

Observation 2008 3: The WDNR is instituting a plan for developing Master Plans for state managed lands. To support the timely, consistent and constructive development and implementation of Master Plans, the WDNR may want to engage in a process to promote the benefits of Master Plans to field personnel. The communication efforts could also help identify and address any field-level questions or concerns about the plans and planning process.

DNR Response: Training efforts appear to be achieving a broad level of buy-in and support for property master planning among DNR personnel.

Auditor Comments after 2009 Audit: Our informal monitoring of this issue during the course of the 2009 surveillance audit confirmed that ongoing training efforts are, in fact, increasing field-level buy-in for property master planning.

Observation 2008.4: The State of Wisconsin has made significant efforts to monitor the deer population in the state, set population goals, and manage deer in a manner that supports multiple land management objectives. The WDNR has tried a variety of hunting season structures and regulations in an effort to bring deer populations closer to desired levels. Deer levels vary throughout Wisconsin; in general populations are somewhat above target but generally not significantly so. Negative impacts to desirable advanced regeneration from deer browse were observed in many forests, particularly in east-central Wisconsin. Ongoing efforts to set and achieve deer population targets at which forest components and diversity can be sustained should be encouraged. Continuing attention is warranted.

DNR Response: The deer herd was below target in most zones following the 2008 hunting season. Wisconsin's 2008 statewide deer harvest dropped 13% compared to 2007. Deer management continues to be a controversial issue. See Secretary Frank's April 2009 testimony to the Senate Transportation, Tourism, Forestry and Natural Resources Committee and the state Assembly Fish and Wildlife Committee.

Auditor Comments after 2009 Audit: We will continue to monitor this issue during future surveillance audits. While it is helpful that deer herd levels were below target in some zones during 2008, excessive deer browse damage remains an issue in many zones.

Observation 2008.5: There are opportunities for better understanding on the part of some Forestry Division field foresters of Division of Land management objectives for state parks, wildlife areas, and other properties administered by the Land Division so that stand management prescriptions designed for these categories of properties will better contribute to management objectives, objectives that typically do not include sustained yield timber production.

DNR Response: The Division of Land updated its vegetative management policy. Certification training and master planning efforts are resolving these issues.

Auditor Comments after 2009 Audit: Our discussions with Division of Forestry foresters and Lands Division field personnel during the course of the 2009 audit indicates that the issue was probably limited in its extent when it was first observed in 2008. We are satisfied that the Department's foresters that support management of Lands Division properties appropriately understand that their harvesting prescriptions must be crafted to achieve the goals established by the property managers.

Observation 2008.6: Recognizing that the WDNR does not regulate workers compensation insurance rates and that the agency did testify in support of rate changes, logging and roading contractors have expressed concerns about current workers compensation insurance rates and the lack of distinction between hand-felling and mechanized operations. These stakeholders concerns and the status of any legislative actions will continue to be monitored.

DNR Response: The Legislature recently adopted changes that will lower mechanized workers compensation insurance rates effective October 1, 2009. The hand-felling insurance premium rate will be \$33.80 and the mechanized rate will be \$19.67 for each \$100 in remuneration provided by an employer to his or her employees.

Auditor Comments after 2009 Audit: We take positive note of the upcoming reduction in mechanized workers compensation insurance rates.

Observation 2008.7: Concerns have been raised by some DNR field personnel regarding the potential use of contract foresters for land management activities on State Forests, a strategy that is being considered in response to the mandate for WDNR to meet timber production goals. The administrative rule that sets up forester contracting includes contractor training requirements and safeguards on contractor performance. Property managers are phasing in contracting trials to assure the concept works as intended. The results of these trials could be monitored and a report prepared to summarize the findings and provide recommendations.

DNR Response: DNR is still monitoring initial timber harvest set-up contracting trials. Only limited use of this tool, five harvests in FY 2009, was made. Evaluations were mixed. Each State Forest has been directed to try at least one timber sale set-up contract in FY 2010 for further analysis.

Auditor Comments after 2009 Audit: We take positive note of DNR's ongoing monitoring of this issue. During this year's audit, we did not observe the same level of concern as was expressed in 2008.

Observation 2008.8: Field personnel were found to have a lack of familiarity with the rutting guidelines and thresholds. While it was confirmed that the guidelines are included in the contracts and as such, are readily available, there is nonetheless an opportunity to improve the working knowledge of the guidelines with foresters who are overseeing logging operations.

DNR Response: DNR continues to provide training on the soil compaction guidelines. We expect field personnel will have a better understanding this year.

Auditor Comments after 2009 Audit: The ongoing training on soil compaction guidelines appears to be yielding positive results as we observed a solid level of awareness and working knowledge of the guidelines during the 2009 audit.

Observation 2008.9: There are opportunities for the Division of Land to enhance tribal stakeholder consultation related to land management activities and impacts on traditional uses and customary rights. The consultation could include a specific request for land management input from tribal interests and representatives. Consultation could also include providing information to tribal members to clarify which activities are permitted on the various land classifications and guidance for non-timber forest product gathering.

DNR Response: DNR is conducting tribal cultural training in collaboration with tribal officials. The training includes an emphasis on consultation. Seven courses have been held to date, and more are planned:

The DNR Tribal Liaison program continues to mature. Each tribe has a DNR contact, and training was held for the liaisons in January 2009. Personnel from the DNR Land and Forestry Divisions also met with tribal representatives at the Great Lakes National Visitors Center in Ashland in October 2008 to discuss ways to improve consultation efforts.

Auditor Comments after 2009 Audit: We take positive note of the DNR's response to this Observation. We will continue to monitor this issue as part of future surveillance audits.

Observation 2008.10: The WDNR may find benefit in continuing to develop The Sustainability Framework as an element of its 10-year Statewide Forest Assessment. The Framework includes its own Criteria and Indicators for Sustainable Forest Management and provides an opportunity to gather valuable, readily available statewide information without additional data generation. Given the statewide scale and scope of WDNR land management the scale of the Framework assists in meeting the need for landscape scale monitoring.

DNR Response: DNR's first full assessment using the new Sustainability Framework is nearing completion, the report to be published in January 2010. The Statewide Forestry Assessment has been a major effort involving about 20 staff and thousands of hours invested in analysis and writing.

Auditor Comments after 2009 Audit: We take positive note of the progress made in utilizing the Sustainability Framework and the resources committed to that effort. As part of the 2010 surveillance audit, we will want to review the report for the first full assessment using the Framework.

Observation 2008.11: The WDNR should complete the process of developing Best Management Practices (BMPs) that address invasive species in forest management and methods for incorporating observed instances of invasive species into the inventory data. The program could include specifics on mapping/identification, removal/control, and prevention, including specifically how the major pathways of invasive species introduction will be contained/controlled.

DNR Response: The Forestry Invasive Species BMPs are complete, and an implementation plan has been adopted. Work continues on the Recreation and Urban BMP's see the following links for more information:

- [Forestry BMP's](#)
- [Recreational Forest User BMPs](#)

- [Urban Forestry BMPs](#)

Wisconsin DNR is also developing a comprehensive invasive species control State Administrative Code (NR 40), which is in the final review stage in the State Legislature.

Auditor Comments after 2009 Audit: The audit team takes positive note of the completion of the Forestry Invasive Species BMPs. During the course of the 2009 surveillance audit, it was our impression that the level of awareness of the BMPs on the part of field personnel is good. During the 2010 surveillance audit, we will want to review the status of the Recreation and Urban BMPs as well as further progress in assuring full integration of the Forestry Invasive Species BMPs.

6.1.5 General Observations from the 2009 Audit

Significant Changes, Initiatives and Actions in the Wisconsin State Forest Program:

The DNR's Division of Forestry recently published the *Statewide Forest Plan 2004-2009 Accomplishments*. This *Accomplishments* report is the culmination of a planning process that started with the 2000 Millennium Assessment [<http://dnr.wi.gov/forestry/assessment/FRresources.htm>](http://dnr.wi.gov/forestry/assessment/FRresources.htm) , 2004 Governor's Conference on Forestry, and 2004 Statewide Forest Plan [<http://dnr.wi.gov/forestry/assessment/index.htm>](http://dnr.wi.gov/forestry/assessment/index.htm) . This report uses the structure developed in the 2004 plan to show how much the forestry community has accomplished over the past five years. Items listed in this report include major accomplishments, new initiatives, and major research undertaken since the 2004 Statewide Forest Plan by many of the partners involved in the protection and sustainable management of Wisconsin's forests. Many of the handbooks that are used by DNR in planning and implementing forest plans are listed in the accomplishment report including Silvicultural Handbook, Woody Biomass Guidelines, Invasive Species Guidelines, Wildlife Action Plan, and Karner Blue Butterfly HCF (as examples). Many of the documents and accomplishments are directly related to the commitment that the DNR has to FSC certification.

Summary of Auditor Findings:

Overall, the SCS audit team was favorably impressed by the continuing high level of forest stewardship associated with the Wisconsin DNR's administration and management of the State Forests and "other state lands" now within the scope of the FSC-endorsed forest management certification. We note, also, that WDNR continues to be a standard setter in its preparation for the annual FSC audits and, in that regard, recognition must again be paid to Paul Pingree, DNR Forest Certification Coordinator.

No doubt because of its much longer engagement with FSC certification, the Division of Forestry, Bureau of Forest Management, and its administration of the State Forests is presently operating at a higher level of conformity to the Lake States Regional Standard than is the Lands Division, particularly with respect to management planning. This differential is reflected in the subject areas and scope of the 3 Major CARs and 1 Minor CAR resulting from this surveillance audit, detailed in Section 2.6. With closure of these CARs, we expect that the 2010 surveillance audit will reveal that the inter-Divisional differences in level of conformity to the certification

standard will be largely if not fully dissipated.

6.1.6 New Corrective Action Requests and Observations Resulting from the 2009 Surveillance Audit

Background/Justification: This Major Corrective Action Request is a follow-on to CAR 2008.1 (related to Master Plans), as insufficient progress in addressing the Minor CAR was observed during the 2009 surveillance audit. Accordingly, SCS is obligated to raise the issue to the status of a Major CAR.	
Major CAR 2009.1	By the end of calendar year 2009, DNR will: <ul style="list-style-type: none"> a) Post property Internet pages with land management objective information for most Tier 1 and Tier 2 DNR properties. (Small Tier 3 property objectives that are not individually listed on the Internet would be covered by the program-wide statements described under “c”, below.) b) Develop a timely schedule for updating the remainder. c) Provide program-wide statements of objectives for each Land Bureau's property and post them on the Internet.
Deadline	December 31, 2009
Reference	<i>FSC Indicators 7.1.a.2, 7.2.a., 7.3.a</i>

Background/Justification: This Major Corrective Action Request is a follow-on to CAR 2008.3 (Master Plan implementation monitoring), as insufficient progress in addressing the Minor CAR was observed during the 2009 surveillance audit. Accordingly, SCS is obligated to raise the issue to the status of a Major CAR.	
Major CAR 2009.2	By the end of calendar year 2009, the Land Division must meld accomplishment reporting with a master plan implementation monitoring system that is functionally equivalent to the State Forests program.
Deadline	December 31, 2009
Reference	<i>FSC Indicator 8.1.b</i>

Background/Justification: This Major Corrective Action Request is a follow-on to CAR 2008.6 (training and licensing for pesticide applicators), as insufficient progress in addressing the Minor CAR was observed during the 2009 surveillance audit. Accordingly, SCS is obligated to raise the issue to the status of a Major Corrective Action Request.	
Major CAR 2009.3	By the end of calendar year 2009, WI DNR will: <ul style="list-style-type: none"> a) Revise Manual Code 4230.1 in respect to consistent pesticide training requirements and implement the changes by Land and Forestry Division Administrator directives pending the DNR Secretary signing the revision. b) Create a DNR Intranet page with training requirements and pesticide use information. c) Inform DNR managers and staff of the pesticide use training policy through an internal newsletter.
Deadline	December 31, 2009
Reference	<i>FSC Indicator 6.6.b</i>

Background/Justification: During the 2009 field audit, it was learned that a DNR Wildlife Biologist had planted GMO Roundup-Ready Soybeans with DNR equipment on a field being preparing for conversion to prairie. This field is within the scope of the FSC certificate as it is not an excised sharecropping parcel. The DNR biologist did not know that FSC prohibits use of GMOs on certified land.	
CAR 2009.1	DNR must develop a policy in regard to staff not planting GMOs on lands within the scope of the Department’s FSC certificate and provide related training by the end of 2009.
Deadline	December 31, 2009
Reference	<i>FSC Criterion 6.8</i>

General 2009 Observations

Observation 2009.1: The ICIT is presently developing new Manual Code guidance for the appropriate seed mixes to use on DNR properties and guidance for evaluating seed mix content. This process was underway during the August 2009 surveillance audit. Completion of this initiative and Secretary approval as new Manual Code will be helpful in better demonstrating conformance with FSC Criterion 6.8.

Observation 2009.2: There is an opportunity for establishing better guidance for field foresters who develop timber harvesting prescriptions in State Natural Areas and Native Community Management Areas.

Observation 2009.3: There is an opportunity to enhance protection of vernal pools by developing additional guidelines.

6.1.7 Certification Decision Resulting from the Annual Surveillance Audit

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

However, as described in Sections 2.4 and 2.6, there are CARs that must be addressed, three of which are Major CARs resulting from our inability to close three Minor CARs issued in 2008. Addressing these CARs within the stipulated timeframes should be considered of high importance for maintaining the DNR’s certification.

7.0 SUMMARY OF SCS COMPLAINT INVESTIGATION PROCEDURE

The following is a summary of the SCS Complaint and Appeal Investigation Procedures; the full versions of the procedures are available from SCS upon request. The SCS Complaint and

Appeal Investigation Procedures are designed for and available to any individual or organization that perceives a stake in the affairs of the SCS Forest Conservation Program and that/who has reason to question either the actions of SCS itself or the actions of a SCS certificate holder.

A **complaint** is a written expression of dissatisfaction, other than **appeal**, by any person or organization, to a certification body, relating to the activities of staff of the SCS Forest Conservation Program and/or representatives of a company or entity holding either a forest management (FM) or chain-of-custody (CoC) certificate issued by SCS and duly endorsed by FSC, where a response is expected (ISO/IEC 17011:2004 (E)). The SCS Complaint Investigation Procedure functions as a first-stage mechanism for resolving complaints and avoiding the need to involve FSC.

An “**appeal**” is a request by a certificate holder or a certification applicant for formal reconsideration of any adverse decision made by the certification body related to its desired certification status. A certificate holder or applicant may formally lodge an appeal with SCS against any adverse certification decision taken by SCS, within thirty (30) days after notification of the decision.

The written Complaint or Appeal must:

- Identify and provide contact information for the complainant or appellant
- Clearly identify the basis of the aggrieved action (date, place, nature of action) and which parties or individuals are associated with the action
- Explain how the action is alleged to violate an SCS or FSC requirement, being as specific as possible with respect to the applicable SCS or FSC requirement
- In the case of complaints against the actions of a certificate holder, rather than SCS itself, the complainant must also describe efforts taken to resolve the matter directly with the certificate holder
- Propose what actions would, in the opinion of the complainant or appellant, rectify the matter.

Written complaints and appeals should be submitted to:

Dr. Robert J. Hrubes, Senior Vice-President
Scientific Certification Systems
2200 Powell Street, Suite 725
Emeryville, California, USA94608
Email: rhrubes@scscertified.com

As detailed in the *SCS-FCP Certification Manual*, investigation of the complaint or appeal will be confidentially conducted in a timely manner. As appropriate, corrective and preventive action and resolution of any deficiencies found in products or services shall be taken and documented.