

Gladwin Forest Management Unit

2013 Final Forest Certification Internal Audit Report

Internal Audit Dates: June 18 - 20th, 2013

Initial Post Audit Draft of Internal Audit:
June 20th, 2013

Internal Audit Report Second Draft:

Lead Auditor: Mike Donovan

Internal Auditors: Patrick Mohnney, Pat Ruppen, Scott Jones

Opportunities for Improvement: 13

Minor Non-Conformances: 4

Major Non-Conformances: None

Follow-Up Required:

Opportunities for Improvement: None

Minor Non-Conformances: One

Major Non-Conformances: None

Final Internal Audit Report:

Opening Comments:

The internal audit of the Gladwin forest management unit was conducted June 18 - 20th, 2013. The scope of the audit was state forest land within the Gladwin forest management unit. The audit criteria were the June 19, 2012 version of the work instructions and all supporting DNR policy, procedures, rules, management guides, guidance documents, plans and handbooks that were relevant to the management of state forest land. On Tuesday, June 18th, separate, detailed lists of audit sites and routes were established for an east tour and west tour of the Gladwin unit based on record searches and interviews with staff. An opening meeting was held with the audit participants on Wednesday morning at the Gladwin office. The field portion of the audit visited 16 sites containing a variety of DNR field management activities. Thursday morning was spent reviewing the audit findings, conducting follow-up interviews and reviewing documents as needed. The audit team gathered evidence to determine work instruction conformance through interviews, document review and field observations. A closing meeting was held on Thursday at 1:00 pm eastern time.

The internal audit team appreciated the cooperation, involvement and openness of the Gladwin unit staff. The audit team was impressed with many of the management activities and the commitment of Gladwin staff to provide a wide range of natural resource values to the public. It was obvious from our observations that multiple resource values are being considered and most of them are appropriately addressed during the administration of timber sales and other programs. The audit team was particularly impressed with the effort to combine multiple compartments into a single area to improve the scale of management planning to better address resource management challenges.

Definitions:

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDN to meet a forest certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs.

Minor Non-conformances: An isolated lapse in MDNR Sustainable Forest Certification Work Instruction implementation which does not indicate a systematic failure to consistently meet a forest certification principle, objective, performance measure or indicator.

Opportunities for Improvement: Opportunities for improvement are findings that do not indicate a current deficiency, but serve to alert the forest management unit to areas that could be strengthened or which could merit future attention.

MDNR's internal audit review process (Work Instruction 1.2) requires a record, evaluation and report of non-conformances with forest certification standards and related work instructions at all levels of the department. As part of that process, we documented the unit's conformity with policy, procedures, management review decisions and work instructions. Results of our audit have resulted in no major non-conformance, five minor non-conformances and 13 opportunities for improvement. Non-conformances are documented on the non-conformance report forms (NCR Form 4502) on the following pages. The opportunities for improvement (OFIs) are listed immediately below along with the work instruction (WI) to which they are tied.

Opportunities for Improvement

OFI 73-01 WI 1.3 - The application of landscape analysis principles could be used to develop wildlife habitat management objectives at the stand level by considering wildlife objectives in adjacent stands. The Lame Duck Foot Access Area is an excellent example of this approach using amalgamated compartments and this approach could and should be implemented in other parts of the management unit.

- This is a very important concept and one that all unit managers should consider and encourage as we start to plan for the 2016 year-of-entry. This will be the first year of operations that will be guided by the new regional state forest management plans and is a very important concept that if successfully implemented will go a long way to ensuring that the objectives of the plans are met. Future audits will look at this concept at the management area scale – the forest management unit scale is not the appropriate scale.

OFI 73-02 WI 1.4 - There could be better attention paid to the identification and marking of individual legacy trees.

- Unit managers are responsible for ensuring that field staff are aware of appropriate procedures for protecting special sites and that the procedures are being implemented as designed.

OFI 73-03 WI 1.4 - Although a variety of folks bring the rare species and community information to the pre-review and compartment review, responsibility for doing so seems to be unclear to staff.

- Unit managers in conjunction with managers from other divisions are responsible for ensuring that staff are aware of the appropriate procedures related to ensuring that the appropriate data is collected and presented for consideration during the various steps of the compartment review.

OFI 73-04 WI 1.6 - Although there appears to be discussion of wildlife values and concerns among the staff, there is virtually no documentation in the compartment review narrative.

- District wildlife supervisors are responsible for ensuring that wildlife field staff are aware of appropriate procedures for documenting wildlife information in the compartment review process. Complete documentation is a critical piece of the business and will be an integral piece of evaluations related to effectiveness monitoring. Future audits will continue to assess documentation.

OFI 73-05 WI 1.6 - With the new role of Parks and Recreation Division in the management/maintenance of trails, Parks and Recreation Division comments should be included in IFMAP with the treatment proposals and in the compartment review narrative when appropriate.

- Forest Resources Division is responsible for ensuring that prescriptions in the treatment proposals and compartment review process include comments on trails from Parks and Recreation Division staff and that they are appropriately entered into the IFMAP database. Complete documentation is a critical piece of the business and will be an integral piece of evaluations related to effectiveness monitoring. Future audits will continue to assess documentation.

OFI 73-06 WI 1.6 - Participation by wildlife and fisheries staff in pre-review and compartment review discussions could be improved.

- This issue has been identified in a minor non-conformance (73-2013-02) in this audit and will be included in the resolution. Participation by wildlife and fisheries staff in the various components of the compartment review process is very important and the unit manager and other division supervisors need to ensure that the appropriate level of input is received.

OFI 73-- WI 3.1 - The lack of funding and/or completion of approved prescribed burn has been noted. A process to secure funding to complete these treatments should be explored. As an alternative, treatments should not be approved if completion is unlikely or alternative treatments should be explored.

- In reviewing the work instruction, funding is an issue that is beyond the scope of the work instruction and the audit and hence it is inappropriate to identify this as an opportunity for improvement.

- Prescribed burns should be scheduled only where they are the preferred treatment, there is a high probability that the desired results will be achieved and the likelihood of funding is highest. Alternative treatments need to be considered as part of the planning process.

OFI 73-07 WI 3.2 - Completion of all the boxes in the on-line resource damage report forms could be improved. Many of the boxes are empty (contact name, due date, completion date, final costs and comments).

- This is another example of incomplete documentation. Complete documentation is a critical piece of the business and will be an integral piece of evaluations related to effectiveness monitoring. Future audits will continue to assess documentation. Unit managers need to be vigilant on ensuring that documentation meets the appropriate standard.

OFI 73-08 WI 3.3 - Instructions for processing road closure forms above the unit manager level need to be provided for interim and ultimately the long-term use.

- A new road closure policy and process is currently under development and will likely be implemented through the newly revised work instruction and will replace any interim direction.

OFI 73-09 WI 6.1 - It was observed that there were missed opportunities to inform and educate the public of recent activities taking place. The timber sale at Black Creek Campground would have been an excellent opportunity to inform the public of the logging activity and educate about forest management. The information board at Pinehaven Recreation Area would be a good place to place some information educating people about the partnership and cooperation of Midland County and Michigan Department of Natural Resources.

- The work instruction directs DNR to conduct public educational outreach through a variety of means including interpretive signage. Perhaps unit managers should look for potential opportunities on an annual basis to minimize missing opportunities such as this.

OFI 73-10 WI 7.1 - Utilization specs could be used in timber sales to help make sure that regeneration is not being impacted by remaining woody debris being left on site. It was observed on multiple locations that the wood product use was poor and the material being left on site was impacting successful regeneration and or future planting operations.

- Regeneration is a critical part of reaching cover type goals and unit managers need to ensure that staff are aware of and follow appropriate guidelines related to regeneration.

OFI 73-11 WI 8.1 - Parks and Recreation Division staff will need work instruction training resulting from the transfer of trail responsibilities from Forest Resources Division to Parks and Recreation Division.

- This issue has been identified in a number of audits in 2012 and 2013 and perhaps a more concerted effort is required to address this need.

OFI 73-12 WI 8.1 - Staff need training related to invasive species identification, potential impacts, threat level and control measures.

- This shortcoming has also been addressed in a number of 2012 and 2013 audits and perhaps does need a more concentrated and centrally coordinated effort.

OFI 73-13 WI 1.1 - *[This was originally written up as a minor non-conformance, but it could not be clearly justified based on the working of the work instruction. It was converted to an opportunity for improvement.]* Many of the related planning documents or planning activities are only in draft form (featured species), are interim guidance (red-shouldered hawk guidelines), are out of date (road closure), not easily accessible (features species) or stagnated without clear direction (Living Legacies). As a result, staff are unaware or confused about direction from these documents or activities when implementing on the ground management. This confusion can threaten many of the natural resource values the planning guidance and activities were designed to protect.

- o The respective management teams from Forest Resources Division and Wildlife Division are responsible for approval of policy for implementation through field staff. Decisions concerning appropriate policy regarding forest and wildlife habitat management need to be made (be it based upon approved supporting documentation, draft documentation or interim documentation) by the respective management teams and the appropriate direction to field staff should be provide through the respective field coordinators and/or the Forest Resources Division district supervisors and unit mangers. The unit managers are ultimately responsible for ensuring that staff are aware of currently approved policy.

Minor Non-Conformances



Michigan Department of Natural Resources - Forest Resources Division

**2013 INTERNAL AUDIT
NON-CONFORMANCE REPORT**

Unit Name: Gladwin Forest Management Unit		Site location: Various interviews and proposed Biodiversity Stewardship sites	Non-Conformance Report Number (Unit Code - yyyy - #): 73-2013-0- <i>Changed to an Opportunity for Improvement - OFI 73-13 WI 1.1.</i>
Lead Auditor: Michael Donovan	Team Members: Pat Ruppen, Patrick Mohny and Scott Jones		
Date: 06-19-2013	Work Instruction or Standard and Clause Number W1.1 Strategic Framework for Sustainable Management		
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor	Other Documents (if applicable):	Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): Forest Resources, Wildlife and Parks and Recreation Divisions Field Coordinators.	
Requirement of Audited Standard/Work Instruction: WI 1.1: The DNR will prepare and maintain a state forest management plan. The plan and related documents will provide forest management guiding principles, strategies and goals.			
Observed Non-conformity: Many of the related planning documents or planning activities are only in draft form (featured species), are interim guidance (red-shouldered hawk guidelines), are out of date (road closure), not easily accessible (features species) or stagnated without clear direction (Living Legacies). As a result, staff are unaware or confused about direction from these documents or activities when implementing on the ground management. This confusion can threaten many of the natural resource values the planning guidance and activities were designed to protect.			

Root Cause Analysis:	
Prepared by and date:	
Corrective Action:	
Prepared by and date:	
Proposed Completion Date:	
Responsible Manager:	
Responsible Manager Signature	Date
_____ Forest Resources Division Unit Manager	_____ Forest Resources Division District Supervisor
_____ Signature	_____ Date
Conversion to an Opportunity for Improvement Accepted:	
Forest Certification Specialist: Scott Jones	
Date: December 19 th , 2013	
Actual Completion Date:	
Responsible Manager:	
Date:	
Verified by:	Closed by:
_____ Responsible Manager Supervisor	Scott Jones Forest Resources Division Forest Certification Specialist
_____ Signature	<i>Scott Jones</i> Signature
_____ Date	December 20 th , 2013. Date
Follow Up Comments:	
This issue was not addressed in the work instruction and hence was converted to an opportunity for improvement.	



Michigan Department of Natural Resources - Forest Resources Division

**2013 INTERNAL AUDIT
NON-CONFORMANCE REPORT**

Unit Name: Gladwin Forest Management Unit	Site location: Multiple sites and record checks.	Non-Conformance Report Number (Unit Code - yyyy - #): 73-2013-01
Lead Auditor: Michael Donovan	Team Members: Pat Ruppen, Patrick Mohny and Scott Jones	
Date: 06-19-2013	Work Instruction or Standard and Clause Number: WI 1.1 Strategic Framework for Sustainable Management of State Forest Land	
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor	Other Documents (if applicable):	Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): Field Coordinators for Wildlife Division (Penney Melchoir), Forest Resources Division (Dennis Nezych), Parks and Resources Division (Anna Sylvester) and Fisheries Division.

CORRECTIVE ACTION PLAN ACCEPTED		
Forest Certification Specialist: Scott Jones		
Date: December 11 th , 2013.		
Actual Completion Date:		
Responsible Manager:		
Date:		
Verified by:	Closed by:	
Bill Sterrett	Scott Jones	
Responsible Manager Supervisor	Signature	Date
	Forest Resources Division	Signature
	Forest Certification Specialist	Date
<p>Follow Up Comments: The proposed completion date of September 2014 is too late to influence the 2016 pre-review meetings and the forest certification specialist has recommended a completion date of April 1st, 2014 instead. This is critical to influence the compartment review process, starting with the pre-review meetings, for the 2016 year-of-entry which is the first year of the new regional forest management plan implementation.</p> <p>Follow Up – June 26, 2014: There was a great deal of discussion around the corrective action and it was ultimately decided to modify the working in the Compartment Review/Inventory policy and procedure that was undergoing revision to clarify this issue and prevent its reoccurrence. Completion of the revisions will not be completed and approved until near the end of this calendar year. Unit managers should be aware of this issue and attempt to guard against it in the meantime.</p>		



Michigan Department of Natural Resources - Forest Resources Division

**2013 INTERNAL AUDIT
NON-CONFORMANCE REPORT**

Unit Name: Gladwin Forest Management Unit	Site location: Fur Farm State Wildlife Management Area	Non-Conformance Report Number (Unit Code - yyyy - #): 73-2013-02
Lead Auditor: Michael Donovan	Team Members: Pat Ruppen, Patrick Mohny and Scott Jones	
Date: 06/19/2013	Work Instruction or Standard and Clause Number: W1.4 Biodiversity Management of State Forest lands	
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor	Other Documents (if applicable):	Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): Wildlife Regional Supervisor – Rex Ainslie
<p>Requirement of Audited Standard/ Work Instruction: It is the responsibility of the DNR land management staff to understand the intent of special conservation area identification as well as the implications for management activities. The database of special conservation areas is located within the Geographic Decision Support Environment (GDSE).</p>		
<p>Observed Non-conformity: Old Fur Farm State Wildlife Management Area is a special conservation area in the GDSE. There are no clear and documented special conservation objectives for this area. Local staff were unaware of its status as a special conservation area. Management prescriptions did not indicate a special conservation objective (Floodwood Mix sale, part of Cemetery Mix sale).</p>		
<p>Root Cause Analysis (Describe the cause of the problem): We are currently using the compartment review process to review, approve or delete special conservation areas that were derived from historical planning boundaries. Several of these areas have not been discussed in the last two entry cycles including the Fur Farm. Under our current approach this problem will not be remedied until all compartments have been reviewed under our current procedures. In addition, I am not aware of a finalized process to specifically formulate objectives for each special conservation area.</p>		
<p>Prepared by and date: Jason Hartman 6-25-13</p>		

Corrective Action:

1. The attached direction (see below in Follow Up Comments section) will be used immediately to provide clear and documented special conservation objectives for the Old Fur Farm Flooding State Wildlife Management Area. This document will be used as an example for other areas that may require clear and documentable special conservation objectives. These documents will reflect the unique character and wildlife communities of the area they outline.
2. The wildlife biologist will work with the foresters to compile a list of special conservation areas within the Gladwin Forest Management Unit. From that list, location and conservation objectives will be created in a documentable format.
3. We will use the special conservation area list and associated documents to provide guidance to stand examiners when they make prescriptions associated with special conservation areas. This guidance will include special conservation objectives relative to each special conservation area that prescriptions may involve.

Prepared by and date: Bruce Barlow, July 2, 2013

Proposed Completion Date: 07/08/2013 for this specific non-conformance. Subsequent special conservation area information will be addressed as each compartment that contains a special conservation area is scheduled for inventory and prescription.

Responsible Manager: **Rex W. Ainslie**, Regional Wildlife Supervisor

Responsible Manager Signature Electronic Date 07/05/2013

<u>Jason Hartman</u> Electronic October 25 th , 2013. Forest Resources Division Signature Date Unit Manager	<u>Bill Sterrett</u> Electronic October 25 th , 2013 Forest Resources Division Signature Date District Supervisor
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CORRECTIVE ACTION PLAN ACCEPTED

Forest Certification Specialist: Scott Jones
 Date: October 14th, 2013.

Actual Completion Date: 07/08/2013 for this specific NCR.

Responsible Manager: Rex Ainslie
 Date: 07/05/2013

Verified by: <u>Penney Melchoir</u> Electronic October 24, 2013. Responsible Manager Supervisor Signature Date	Closed by: <u>Scott Jones</u> <i>Scott Jones</i> October 25 th , 2013 Forest Resources Division Signature Date Forest Certification Specialist
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Follow Up Comments:

Old Fur Farm Flooding State Wildlife Management Area Habitat Management

Contact: Gladwin DNR Wildlife Field Office 2,056 acres in Clare County
801 North Silverleaf, Gladwin, MI 48624 (989) 426-9205

[Link to area map](#)

This area is being managed for the features species listed below and may include the following habitat management practices:

Mallard:

- Maintain 50:50 ratio of marsh to open water condition: removing tree stubs, digging potholes, dredging channels and maintaining ditch systems and culverts.
- Maintaining grasslands adjacent to wetlands: planting warm and cool-season grasses, applying herbicides, prescribed burning, mowing and haying.
- Planting food plots (corn, buckwheat, oats, etc.).
- Maintaining a good mix of seed-producing wetland plants: manipulating water levels, bulldozing, disking and seeding.
- Controlling *Phragmites* and narrow-leaf cattail: applying herbicides and prescribed burning.
- Maintaining water control structures and dikes: routine inspections of all structures, mowing, applying herbicides, removing brush, repairing pumps and valves, filling rodent burrows, replacing guard rails over dams and removing debris.
- Providing and maintaining nesting tunnels.

Pileated Woodpecker:

- Reserving large, dead, dying and cavity bearing trees during timber harvests.
- Maintaining large blocks of mature, closed-canopy forest.

Wood Duck:

- Maintaining forests in floodplains and lowlands and within 150 feet of wetland edge: single tree and group-selection timber harvests.
- Maintaining trees, shrubs and emergent vegetation in wetlands.
- Maintaining the oak component near wetlands, lakes and rivers: promoting the regeneration of oak and retaining a representation of mature acorn producing trees during harvests.
- Reserving large, dead, dying and cavity bearing trees during timber harvests within a mile of wetlands, lakes, and rivers.
- Partnering with volunteers to build, install and maintain wood duck nest boxes.
- Controlling glossy buckthorn and *Phragmites*: cutting, applying herbicides and prescribed burning.
- Maintaining flooded marshes and swamps by maintaining water control structures and dikes: mowing, applying herbicides, removing brush, repairing chipped concrete and rodent burrows, replacing guard rails over dams, routine inspections of all structures and removing debris.



Michigan Department of Natural Resources - Forest Resources Division

2013 INTERNAL AUDIT NON-CONFORMANCE REPORT

Unit Name: Gladwin		Site location: Multiple sites and interviews		Non-Conformance Report Number (Unit Code - yyyy - #): 73-2013-03	
Lead Auditor: Michael Donovan		Team Members: Pat Ruppen, Patrick Mohny and Scott Jones			
Date: 06/19/2013		Work Instruction or Standard and Clause Number: 2.1 Reforestation			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable):		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): Timber Management Specialist - Scott Throop	
Requirement of Audited Standard/Work Instruction: The timber management specialist will be required to provide any available regeneration information, such as shape files, regeneration counts and forest treatment proposal completion reports (R-4048-1).					
Observed Non-conformity: Last planting summary sent to management unit from the timber management specialist was for 2007. No forest treatment proposal completion reports were received for the 2012 planting season. Inventory records are not updated because treatment completion reports are not available. Specific examples are forest treatment proposal C-73-907 and C-73-908 from Timber Sale #73-015-11-01.					
Root Cause Analysis: Completion reports for forest treatment proposals completed 2012 were filled out January 28-30 th , 2013 for the western northern Lower Peninsula. Notification was given to the district Forest Resources Division secretary to send copies to the forest management units and file the district copies at that time. With busy schedules, the necessary follow-up slipped through the cracks. Because tracking hard copies sent by mail has proven hard to do, it was decided to send them electronically.					
Prepared by: Scott Throop, Timber Management Specialist, July 2, 2013					
Corrective Action: <ul style="list-style-type: none"> The 2011 forest treatment completion reports were resent to all the western northern Lower Peninsula units 7/3/13 as well as the 2012 reports. Specific requests for site information is provided as requested. Trenching site GPS files are received in batches with multiple sites across the different forest management units in specific shape files from the trenching contractor. These shape files will be forwarded by year to the respective forest management units. Planting summaries and completion reports have been sent to the units each year, with the exception of the 2012 miscommunication. The 2007-10 information has been sent to the units. All trenching, planting, regeneration survey data and follow-up treatments are tracked through a forest treatment database maintained by the timber management specialist. Requests have been filled with Resource Assessment Unit to convert our tracking database to SQL so we can allow direct read access with the Unit. 					
Prepared by: Scott Throop, Timber Management Specialist, July 2, 2013					
Proposed Completion Date: July 31, 2013 Responsible Manager: Scott Throop					
Responsible Manager Signature		Electronic		Date: July 2, 2013.	
Jason Hartman _____ Forest Resources Division Unit Manager		Conference Call December 16, 2013 _____ Signature Date		Bill Sterrett _____ Forest Resources Division District Supervisor	
		Conference Call December 16, 2013. _____ Signature			

CORRECTIVE ACTION PLAN ACCEPTED			
Forest Certification Specialist: Scott Jones			
Date: December 12 th , 2013.			
Actual Completion Date: Partially completed in mid-July, balance by December 16 th , 2013.			
Responsible Manager: Scott Throop			
Date: December 16, 2013.			
Verified by:		Closed by:	
Bill Sterrett	Conference Call	December 16, 2013	Scott Jones
Responsible Manager Supervisor	Signature	Date	<i>Scott Jones</i> December 16, 2013.
			Forest Resources Division Forest Certification Specialist
Follow Up Comments:			



Michigan Department of Natural Resources - Forest Resources Division

**2013 INTERNAL AUDIT
NON-CONFORMANCE REPORT**

Unit Name: Gladwin	Site location: Baker Road Sale	Non-Conformance Report Number (Unit Code - yyyy - #): 73-2013-04
Lead Auditor: Michael Donovan	Team Member(s) Pat Ruppen, Patrick Mohney and Scott Jones	
Date: 06/19/2013	Work Instruction or Standard and Clause Number: W 7.1 Timber Sale Preparation and Administration Procedures	
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor	Other Documents (if applicable):	Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): Forest Resources Division, Unit Manager: Jason Hartman
Requirement of Audited Standard/ Work Instruction: Final Inspection: A final inspection will be completed for each timber sale contract and will be documented on Form R-4050 when a sale is completed, closed or cancelled. The final timber sale inspection report (front page of R-4050) will be attached to the Timber Sale Completion Report. A copy of the entire timber sale inspection report will be kept as part of the timber sale record. There must be thorough documentation of "not acceptable" conditions and corrective actions during the term.		
Observed Non-conformity: Poor utilization of wood was observed on the closed Baker Road Sale. The sale administrator noted the poor utilization on the final sale inspection and deemed it acceptable. Unfortunately, the poor utilization of wood would make obtaining the alternative management objective (if the primary management objective failed) of planting pine extremely difficult. The auditors also express concern that the alternative management objective of planted pine after a lowland aspen harvest was unattainable to begin with even before the poor utilization of wood occurred.		
Root Cause Analysis: The Gladwin Forest Management Unit contains substantial acreage of lowland cover types including lowland aspen. Previous efforts to maintain as much aspen as possible have met with mixed results. The shorter and warmer winters are making the regeneration of lowland aspen more difficult as more producers are choosing to operate in the late summer/early fall. Efforts in previous decades to "break up" stands to create more edge also caused more deer browsing which further complicated regeneration. More recent developments involving alternative regeneration documentation further confounded this issue. Staff generally understood that these sites		

would never be regenerated artificially, but they felt compelled to document a backup per the work instructions.

Prepared by: Jason Hartman, July 2, 2013

Corrective Action:

The unit is currently transitioning toward larger compartments which will allow us to treat larger more contiguous stand more efficiently and provide increased opportunities to overwhelm the deer browsing impacts. We are also moving forward with some unit level guidance to avoid artificial regeneration prescriptions as alternatives to natural regeneration in lowlands, restrict lowland aspen harvest to the dormant season and avoid treatments under certain acreage.

Prepared by: Jason Hartman, July 2, 2013

Proposed Completion Date: July 31, 2013.

Responsible Manager: Jason Hartman

Responsible Manager Signature Electronic Date July 2, 2013

<p style="text-align: center;">Jason Hartman Conference Call December 16, 2013.</p> <hr style="width: 80%; margin: 0 auto;"/> <p style="font-size: small;">Forest Resources Division Signature Date Unit Manager</p>	<p style="text-align: center;">Bill Sterrett Conference Call December 16, 2013.</p> <hr style="width: 80%; margin: 0 auto;"/> <p style="font-size: small;">Forest Resources Division Signature Date District Supervisor</p>
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CORRECTIVE ACTION PLAN ACCEPTED:

Forest Certification Specialist: Scott Jones

Date: October 16, 2013.

Actual Completion Date: October 15th, 2013.

Responsible Manager: Jason Hartman

Date: December 16, 2013

<p>Verified by:</p> <p style="text-align: center;">Bill Sterrett Conference Call December 16th, 2013.</p> <hr style="width: 80%; margin: 0 auto;"/> <p style="font-size: small;">Responsible Manager Supervisor Signature Date</p>	<p>Closed by:</p> <p style="text-align: center;">Scott Jones <i>Scott Jones</i> December 16, 2013.</p> <hr style="width: 80%; margin: 0 auto;"/> <p style="font-size: small;">Forest Resources Division Signature Date Forest Certification Specialist</p>
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Follow Up Comments:

Here is a list of the large compartments that have been created so far:

*Comp. 9 – Kirtland's warbler - a makeup of 3-4 previous compartments. Delineated based on Kotar. North of river
Comp. 10- Also Kirtland's warbler and 3-4 other previous compartments. Delineated based on Kotar. South of river
Comp. 41 – Lame Duck Foot Access Area- 11,000 acres. Previously 7 other compartments. Delineation based on existing directors order, Draft management plan and high conservation value area boundaries.*

Logic for larger compartments includes:

- Reductions in deer browse issues by overwhelming the regenerating cohort in a geographic area*
- Easier to replicate natural disturbances*
- Opportunities to offer larger sales to producers*
- Efficiencies in road planning*
- Efficiencies in stage 1 inventory - a reduction in the number of stands due to less edge*
- Easier to prioritize necessary treatments*
- Reduction in the poor management decisions related to “looking for something to cut”*
- Reduction in out-of-year-of-entry treatments or treatments that cross compartment boundaries - especially in Kirtland's warbler habitat*
- Increased transparency to the public - especially if treatments crossed compartment boundaries*
- Increased ability to determine management intent and priority*
- Easier to “name” a compartment instead of “number” it - providing better ability to communicate with the public about a plan for an area.*

Major Non-Conformances

There were no major non-conformances identified for the Gladwin Forest Management Unit in this 2013 audit.

Report and Review Procedure following the Internal Audit:

1. Non-conformance reports that describe observed nonconformity with forest certification work instructions will be prepared by lead and staff auditors during internal audits.
2. Lead auditor will prepare a draft internal audit report consisting of audit team members, non-conformance reports and a brief audit summary (cover memo). Complete at closing meeting.
3. Lead auditor will send the draft internal audit report to unit manager and send a copy to forest certification specialist and Forest Resources Division district supervisor within one week.
4. The responsible manager will respond to the non-conformance reports and assemble the root cause analysis and corrective actions for all non-conformance reports in consultation with the unit manager or dispute findings with an explanation. The unit manager will send to the Forest Resources Division district supervisor with copy to forest certification specialist and lead auditor.

5. The Forest Resources Division district supervisor will review, support and date the non-conformance reports. The Forest Resources Division district supervisor will send the internal audit report with approved non-conformance reports to the forest certification specialist within four weeks of the closing meeting. A copy of this report will also be sent to the lead auditor.
6. The forest certification specialist will consult with lead auditor to confirm corrective actions satisfactorily address non-conformance reports. The forest certification specialist will review and sign the non-conformance report corrective actions to acknowledge completion. Complete within six weeks of closing meeting date.
7. Forest certification specialist will forward final internal audit report to Forest Certification Team, Forest Resources Division management team, Forest Resources Division district supervisors, all Forest Resources Division managers and representatives from other divisions, as identified by the Forest Certification Team division representatives.
8. Corrective actions will be cleared via notification by the responsible manager that corrective actions are complete and via verification by the responsible manager's supervisor.
9. The forest certification specialist shall track open non-conformances to confirm that all are followed through to completion.