

FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY ANNUAL SURVEILLANCE AUDIT REPORT

Michigan Department of Natural Resources
Michigan State Forests
Michigan, USA

SCS-FM/COC-00090N

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8-10/Oct/2013
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Foreword

Cycle in annual surveillance audits			
<input type="checkbox"/> 1 st annual audit	<input type="checkbox"/> 2 nd annual audit	<input checked="" type="checkbox"/> 3 rd annual audit	<input type="checkbox"/> 4 th annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
Michigan Department of Natural Resources (MDNR)			

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database <http://info.fsc.org/>.

Pursuant to FSC and SCS guidelines, annual / surveillance audits are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope audit would be prohibitive and it is not mandated by FSC audit protocols. Rather, annual audits are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual audit);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this audit; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

Structure of this Report

This report of the results of the 2013 annual surveillance audit 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 FSC Certificate Database (<http://info.fsc.org/>) no less than 90 days after completion of the on-site audit. Section B contains more detailed results and information for the use by the Forest Management Enterprise (FME).

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Annual Audit Team

Auditor Name:	Robert Hrubes, Ph.D.	Auditor role:	Lead FSC auditor
Qualifications:	<p>Dr. Hrubes is a California registered professional forester (#2228) and forest economist with over 35 years of professional experience in both private and public forest management issues. He is presently Senior Vice-President of Scientific Certification Systems. In addition to serving as team leader for the Michigan State Forest 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 audits under the SCS Forest Conservation Program of North American public forest, 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 (Ph.D.), economics (M.A.) and resource systems management (M.S.) 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.</p>		
Auditor Name:	Kyle Meister	Auditor role:	Team auditor
Qualifications:	<p>Kyle Meister is a Certification Forester with Scientific Certification Systems. He has been with SCS since 2008 and has conducted FSC pre-assessments, evaluations, and surveillance audits in Brazil, Panama, Mexico, Costa Rica, Bolivia, Indonesia, India, Japan, New Zealand, Spain, and all major forest producing regions of the United States. Mr. Meister has successfully completed CAR Lead Verifier, ISO 9001:2008 Lead Auditor, and SA8000 Social Systems Introduction and Basic Auditor Training Courses. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan; and a Master of Forestry from the Yale School of Forestry and Environmental Studies. Mr. Meister has experience as an environmental educator and natural resource consultant in the U.S., Mexico, Ecuador, Costa Rica, Colombia, and Brazil. He is a member of the Forest Guild and Society of American Foresters.</p>		
Auditor Name:	JoAnn Hanowski	Auditor role:	Team auditor
Qualifications:	<p>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</p>		

	<p>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 was 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 2007 JoAnn contributed regional ecological expertise to the annual surveillance audits of the MN DNR’s FSC and SFI certificates.</p>		
Auditor Name:	Norman Boatwright	Auditor role:	Lead SFI auditor
Qualifications:	<p>Mr. Boatwright has over twenty-eight years’ experience in intensive forest management, seventeen years’ experience in environmental services and ten years’ experience in SFI auditing. He has conducted Phase I Assessments on over two hundred and fifty projects covering 2,000,000 acres, ESA and Endangered Species Assessment on timberland across the South, and managed soil mapping projects over 1.3 million acres. From 1985-1999, he was Division Manager at Canal Forest Resources, Inc. and was responsible for all forest management activities on about 90,000 acres of timberland in eastern South Carolina. Duties included budgeting and implementing land and timber sales, site preparation, planting, best management practices, road construction, etc. Norman is a Qualified Lead Auditor under the NSF-ISR SFI Program with extensive experience auditing procurement and land management organizations.</p>		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	3
B. Number of auditors participating in on-site evaluation:	4
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	1
D. Total number of person days used in evaluation:	13

1.3 Standards Employed

1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC-US Forest Management Standard	1.0	July 8, 2010
<p>All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSGlobalServices.com).</p>		

2 Annual Audit Dates and Activities

2.1 Annual Audit Itinerary and Activities

Pigeon River Country (PRC) Re-Certification/Surveillance Audit 10/8/13 - Audit Route 1 (North Route)				Hanowski & Meister
Stop #	Comp	Name	Feature of interest	Notes
		Auditors arrive @ PRC FO	Opening Meeting and FMU & District Briefs	
		Opening Meeting		
		FMU & District Briefs		
1	14	Grindstone Creek Natural Area SCA	Type 2 Old Growth - Mesic Northern Forest (SCA)	Hardwood Natural area; 300 acres. No harvest zone, treatment of invasive and road management allowed to retain structure and access.
2	9	Option 1: Campsite Road Ash/Shore to Shore Ash	Active N. Hardwood selection & ash salvage sales,	Ash salvage; observation of selection system to reduce ash density and maintain non-affected species; interview with two logging crews
3	9	Pine Grove Campground/High Country Pathway Bridge	State Forest Campground, pathway, footbridge	In process of upgrading bridge; example of foot trail
4	17	CCC Elk Viewing Area	Designated elk viewing area, elk management	80 acre elk viewing area; prescribed burns conducted every 3-4 years; plant annual rye and buckwheat for elk herd; elk monitoring discussion
5	35	Tomahawk Sites	Oil and Gas use, land use issues, well site restoration	Reclamation area planted with oak and jack pine to be similar to adjacent stands; objective to reduce invasive spp density
6	28	Badgerville Aspine Tsale	Open sale Red Pine shelterwood, aspen clearcut	Discussion of monitoring timber sale progress and contract completion; road access plan discussion and roadless area discussion

7	18	Clark Bridge Rd.	Natural Red Pine Reproduction	Red pine seed-tree harvest; snag and woody debris retention; discussion of retention policy on clearcuts >40 acres and director's orders
8	33	Lost Lake	Sinkhole Lake Erosion Site, RDR, conservation partners	Resource damage report area with straw waddles and downed trees installed to block trails and curb erosion into karst sinkhole.
PRC Re-Certification/Surveillance Audit 10/8/13 - Audit Route 2 (South Route)				Boatwright & Hrubes
Stop #	Comp	Name	Feature of interest	Notes
		Auditors arrive @ PRC FO	Opening Meeting and FMU & District Briefs	
		Opening Meeting		
		FMU & District Briefs		
1	53	Blue Paint Special Tsale	Recently cut timber sale, aspen clearcut	Aspen clearcut completed 9/2013. TS Proposal indicated aspen retention but none was left.
2	53	Saunders Dam	Dam removal, stream restoration, partnerships	Dam removal, stream restoration, partnerships. Headwaters of Black River, one of 3 Blue Ribbon Trout Streams in the forest. Partnered with Huron Pines to obtain funding.
3	50	Super Spruce Tsale	Open timber sale, no activity yet, lowland harvest	Open timber sale, no activity yet, lowland harvest. Black spruce leaving red and white pine along edges
4	47	2 Little Pigs Tsale	Hwd selection cut set up by contractors	Hwd selection cut set up by contractors. Well marked. Visited a 5 ac retention area that is a known red shoulder hawk nest site.
8	54	Heavy Snow Hardwood Tsale	N. Hardwood selection, active sale	N. Hardwood selection, active sale. Interviewed logger, Gary Haskell - SFI logger certified. Will leave a nice balsam/maple stand with 80 sqft BA.

Grayling Re-Certification/Surveillance Audit 10/9/13 - Audit Route 1 NW Crawford Co.				Boatwright & Meister
Stop #	Comp	Name	Feature of interest	Notes
		Auditors arrive @ Grayling FO	FMU Brief	
		FMU Brief		
1		Travel through Howes Lake Fire Area	Large fire burnt a lot of Kirtland warbler enhanced habitat. Left areas unsalvaged for woodpeckers and research.	Sale administrator Forester Tom Barnes
2	177	Sale 72-033-09-01 Howes Manistee Oak Jack Sale	Active harvest. Very good retention and no issues.	Sale administrator Forester Tom Barnes
3	176	Sale 72-029-10-01 Valley Pine	Completed 3rd Red Pine thinning with little damage to residuals. JP final harvest with good retention.	Sale administrator Craig Farrer who is no longer working for MDNR. Discussed the new natural regen stocking procedure with Joan Charlebois
4	169	Sale 72-038-10-01 Lost Lake Aspen	Final Harvest aspen type with wetland and water interface, sale closed. Good retention with snags and RMZ buffer along lake and outlet stream.	Sale administrator Forester Joan Charlebois
5		Goose Creek SFC, Equestrian Camp, and new access site	Tour recreation site and lunch stop	
6	169	DeWard Special Mgt Area and visit to recently drilled wellsite	State Frederic 12-8 Permit No. 72-402-2013. No issues - 1/10 ac mud pond.	Land Use Specialist Ken Phillips
7	212	Mt Frederic RDR site	RDR #72212202006033. Interesting site with 2 large hills on both sides of public road that experienced a lot of ORV use with damage and erosion. DNR constructed barriers and regenerated with pine.	FO Jack Money, CO John Huspen
8		Wellsite RDR	Well Permit no. 72-093 ST Fred A1-36 & RDR #72209202013001. Gas pad sloped downhill towards steep road, which had washed out. Road has	Land Use Specialist Ken Phillips

			been fixed by the gas company but water diversion has not been installed.	
9	212	Mt Frederic RDR site	RDR #72212202006033	FO Jack Money, CO John Huspen
	207/208	Compt 207 & 208 BBD #72-003-11-01	NH thin with contract open. Nice NH thin. Some skins <5% along skids trails and minor rutting which was noted on the TSI form.	
10	207	Sale 72-036-11-01 Black Canker Aspen	Aspen Final Harvest- may be active during audit. Black canker on aspen. Leaving pine and a good buffer along public road and per stream. Good retention.	Sale administrator Forester Scott Shooltz
Grayling Re-Certification/Surveillance Audit 10/9/13 - Audit Route 2 SW Crawford Co.				Hanowski & Hrubes
Stop #	Comp	Name	Feature of interest	Notes
		Auditors arrive @ Grayling FO	FMU Brief	
		FMU Brief		
1	224	Sale no. 72-021-11-01 4-Mile Oak	Final harvest oak sale, harvest done.	<p>A 27-acre oak clearcut harvested in the summer of 2013. Retention was by prescription, finalized in compartment review, and was to leave all red pine and marked scattered oak. A visual buffer was left along the highway (1.8 acres) and will be retained until the next overstory removal harvest. There were some nice pockets of advanced regeneration left on the site but, overall, retention did not exceed 3-5% of pre-harvest basal area.</p> <p>Illegal ORV use of the site was discussed. A large "tank trap" was constructed at the main entrance but there are other access points that make control</p>

				of unauthorized activities very difficult.
2	234	Sale 72-020-12-01 Warbler Oak	48 acre final harvest of oak stand completed in April 2013	<p>This 46.9 acre clearcut with reserves in an oak stand was completed in 2013. Red pine and oak islands were left as retention. Water bars on a steep access road were inspected and found to be sufficient in protecting soil erosion.</p> <p>Habitat enhancement techniques (“vortices” and wave patterns of disking and planting) were observed and discussed.</p>
3	234	Sale 72-044-10-01 Three Men & Warbler	KW Final Harvest, harvest recently completed and sale contract still open, Trenched under FTP W72-725 and to be planted in 2014.	<p>This 301 acre clearcut in jack pine for Kirtland’s Warbler habitat. The site was trenched following harvest and will be planted in the spring of 2014. A weave pattern was constructed to promote the formation of small openings in the dense planting that the warbler utilizes for nesting and foraging. We also observed retention vortices. Strips of mature jack pine left on the landscape that are retained to mimic natural fire patterns in the region.</p>

4		C 293 Mason Tract Herbicide Application	FTP 72-711 + PAP for barberry eradication	This 5 acre area was treated with Rodeo (glyphosate) to eradicate Japanese Barberry. The site had a detailed pesticide application plan and the treatment was completed by a licensed applicator, a DNR employee, who demonstrated a solid understanding of the FSC pesticide use policies. The auditors confirmed that the applicator had checked the approved chemical list and had posted signs in the area before applying the herbicide.
Unscheduled stop				Canoe Harbor SFC (cedar plantings and in-stream structure placement) A citizens group “Cedars for Au Sable” has been planting young white cedars in riparian areas along both the Au Sable and Manistee Rivers. The groups are associated with Trout Unlimited and the Sierra Club. Locations for the plantings were selected by foresters and trees have had up to 90% viability.
5		Woody Debris Fisheries Habitat Project	FTP F72-726	Division of Forestry cooperated with fisheries to identify sites where whole trees could be harvested for use in an in stream fish habitat improvement project on the Au Sable River. A helicopter was used to pick the trees up and strategically place them along an 11 mile stretch of stream to create trout habitat.

6	297	Sale 72-046-11-01 Thayer Creek Mix	Final harvest of aspen and Q types, contains a wet sale unit and interfaces with wetland. Partly harvested. May be active during audit.	This active sale was an oak/aspen clearcut with reserves. This site had a 150 foot no-cut buffer along a stream and retention trees were marked based on vigor. Wolfy trees are also commonly marked for retention. We interviewed Marty Muma, an employee of Chris Muma. He had good training (they are required to have at least 8 hours/year) and there was appropriate spill clean-up and first aid equipment located in a trailer on the site.
7	297	Sale 72-050-11-01 Durant Durant Remix	Final harvest, sale recently completed and closed	An aspen clearcut recently completed with red, white and jack pine retention. There were also three retention islands and a boundary line retention in a riparian buffer along Thayer Creek. The 150 ft wide buffer had balsam fir and aspen. Riparian buffers are prescribed dependent upon the stream type.
8	193	Sale no 72-014-10-01 Big Pine Small Aspen Sale	Final harvest red pine and aspen, one unit cut, one unit turned back in and is in process of being readvertised.	This site was an overstory removal of red pine and aspen. The goal is to regenerate aspen. The purchaser had piled up tops for a biomass chipping but went out of business before completing the task, defaulting on the contract. The piles remain on the site despite efforts to have them burned (could not complete due to power line and oil/gas line issues). One of the two stands that were purchased by the contractor was not harvested and will be put up for rebid that includes chipping the brush piles. A reduced bid price will be put on the new sale to entice bidders.

				A discussion ensued about the inadequacy of the performance bond—5%--to protect the state’s interests in the event of contract default.
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Roscommon Re-Certification/Surveillance Audit 10/10/13 - Audit Route 1 East Tour				Boatwright & Hrubes
Stop #	Comp	Name	Feature of interest	Notes
		Auditors arrive @ Roscommon FO	FMU & District Briefs	
		FMU & District Briefs		
1		602 and Sunset Road project	Road maintenance culvert replacement	A 14"-16" replacement culvert was installed. Installation was completed effectively. Dale --- is to be commended for his efforts to retrieve some litter, as he ended up in mud up to his hips and needed help in being extricated.
2	1	Roscommon Red Pine Natural area	HCVA, Possible Type 1 Old Growth site	This area requires a State of Michigan recreational user's Passport for access. This site, near a community college, receives limited use but it nonetheless is a notable example of the diversity of values the DNR is managing for.

3		Herbicide FTP 71-887	Herbicide application in red pine plantation	<p>Contractor: Skyline. Chemical herbicide: glyphosate. Applied by helicopter in the fall, in part due to logistics. Some snags were retained despite desire of helicopter pilot to have no retention. The operation, overall, demonstrated conformance with Indicator 6.6.d. A side-issue was raised and discussed at this stop: the County requested authorization to aeri ally apply permethrin on the state forests. As this chemical is on the FSC prohibited list, DNR appropriately denied the request but the County is continuing to seek authorization.</p>
4		Meridian Rd Road project	Road maintenance project	<p>The main focus of this stop was wildlife plots planted with rye in an effort to build up the soil layer. Rape seed and turnip were also planted. Targeted wildlife species are deer and turkey. Seed mix was checked to be sure it did not contain GMOs. Invasive issue on this site--spotted knapweed. Across the road, a poorly stocked clearcut site was examined on an impromptu basis. Issue: the unit has been understocked and essentially non-productive for approximately 10 years.</p>

5		Red Barrens Pine/Refuge forest fire/Meridian Rd RDR	Old RDR; closed old clay pit; barrens restoration; 2012 wildfire	Pine Barrens restoration project--harvested in 2010. A wildfire in Spring 2011 burned up most of the project area.
6		St Helen Township Park Lunch	SF land leased to township	Discussion of ORV use on the state forests as well as importance of outdoor recreation to the local economy.
7	87	Option 1: Clay Bottom Aspen and Road T Sale	Road maintenance project; aspen clearcut open but ready to close	Not visited
	89	Option 2: Russell Lake Aspen T sale	Active aspen clearcut	Final harvest of 70 acres. Leave trees: pine and oak. Overall, retention levels were not impressive except in one perimeter retention area. A vernal pool was not adequately protected, violating BMPs. There was also a hydraulic fluid spill that was not attended to, also violating BMPs and terms of the sale contract--both situations constitute FSC Non-Conformities.
	7	FSC Closing Meeting		
Roscommon Re-Certification/Surveillance Audit 10/10/13 - Audit Route 2 West Tour				Hanowski & Meister
Stop #	Comp	Name	Feature of interest	Notes
		Auditors arrive @ Roscommon FO	FMU & District Briefs	
		FMU & District Briefs		

1		Everett Rd RDR	RDR Project	Discussion of recreation management. Camp access restricted through barrier installation to reduce ORV effects to camp sites and streams.
2	64	Beyond 20 Timber Sale	Oak selection and aspen CC sale, not active	Two harvest areas involving harvest near adjacent private land; discussion of oak thinning and regeneration strategy
3	69	Alligator Ash Timber Sale	Ash salvage sale, wet area, not active	Sale closed due to rutting. Attempts at wet and dry season logging. DNR will examine alternatives for this site.
4		RDR near US 127	Illegal ORV use	Signage installed, damaged site planted and road upgraded to accommodate ORV use while restricting access to productive forest.
5	78	Reedsburg Mix Timber Sale	Closed jack pine sale, wet area	Oak and overstory jack pine retention in clumps and individuals; winter logged for regeneration objectives (stump sprouting)
6	151	402 Aspen Tsale	Aspen final harvest, not active	Group and individual tree retention in aspen clearcut (3-10% area retention). Retain larger aspens at sale boundary
7	115	Porcupine Red Pine Tsale	Closed Red Pine thinning	2nd thinning of Red pine stand; work with adjacent landowners on access and road upgrade. Retain midstory oaks and other hardwoods for diversity.
		Arrive at Roscommon FO		
		FSC Closing		

	Meeting	
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2.2 Evaluation of Management Systems

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME’s conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3. Changes in Management Practices

There were no observed significant changes in management practices that affected MDNR’s conformance to FSC requirements since the 2012 annual surveillance audit.

4. Results of the Surveillance Audit

4.1 Existing Corrective Action Requests and Observations

Finding Number: 2012.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
FSC Indicator:	Indicator 6.4.c
Non-Conformity: Not applicable	
Observation: Throughout much of 2012, development the Regional State Forest Management Plans required the dedication of staff resources that, to a substantial degree, were redirected from the Biodiversity Conservation Planning Process. Now that the RSFMP process is largely completed, it is important that staff resources are rededicated to completion of the BCPP/BSA process, which has	

<p>suffered from numerous delays since at least 2008. Completion of the Biodiversity Conservation Planning Process, including key tasks such as delineating Biodiversity Stewardship Areas on the state forests and identifying compatible land uses for the BSAs, has been the focus of numerous FSC Findings since 2008 (CAR 2008.1, CAR 2009.1, OBS 2010.9, OBS 2010.19). The credibility of the FSC certification process as applied to Michigan DNR is not enhanced by this protracted delay.</p>	
<p>FME response <i>(including any evidence submitted)</i></p>	<p>See "Issue Statement for the DNR Resource Bureau Management Team April 9, 2013" attached.</p>
<p>SCS review</p>	<p>MDNR's response details the background information and history of MDNR's related attempts at conservation strategies and management for identified ecosystems of importance. MDNR's discussion of how each of these ecosystems fits into different requirements of the FSC standard is well done and includes an analysis of how its current approach does not fully meet the Criterion 6.4. The discussion includes some possible options for completing the requirements of C6.4, but MDNR has not implemented any new actions to complete its RSA assessment. Given the number of past nonconformities on this issue that were resolved and the number of setbacks since those were closed, MDNR risks failure to comply with a key FSC requirement.</p>
<p>Status of CAR:</p>	<p><input type="checkbox"/> Closed <input checked="" type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)</p>

<p>Finding Number: 2012.2</p>	
<p>Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation</p>	
<p>FMU CAR/OBS issued to (when more than one FMU):</p>	
<p>Deadline</p>	<p><input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.</p>
<p>FSC Indicator:</p>	<p>Indicator 5.6.a</p>
<p>Non-Conformity: Not applicable</p>	
<p>Observation: On one of the FMUs visited this year and across the western Upper Peninsula, there has been a substantial increase in the scheduling of timber harvests in compartments that are "out of year of entry." While out of year of entry harvest scheduling may be warranted on the basis of stand level conditions and, to a degree, logistical considerations, a broad departure (e.g., 25% increase in out of year of entry harvesting) sustained over more than one year runs the risk of rendering invalid the DNR's allowable harvest regulation process.</p>	

FME response <i>(including any evidence submitted)</i>	See attachments related to Ash and Beech management, species which are undergoing increased salvage harvests and disease prevention silvicultural treatments due to invasive exotic pathogens.
SCS review	MDNR created an “Ash and Beech” tracking function within the IFMAP for state foresters to analyse current merchantable and submerchantable ash and beech components in the FMU. This allows MDNR to target stands at most risk for Emerald Ash Borer and Beech Bark Disease, develop treatment or no treatment options, and finally decide if an out-of-year entry is warranted. Non-affected stands may be entered on time or at a later date based on the impacts of out-of-year harvest to a district.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2012.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
FSC Indicator:	Indicators 1.5.a and 1.5.b
Non-Conformity: Not applicable	
<p>Observation: A chronic problem that DNR has had to deal with is unauthorized encroachment onto State Forest lands by neighbors (e.g., private structures or roads partially or entirely located on State Forest land). As the problem has grown, DNR has initiated policies, initiatives and actions aimed to control encroachment. In the last few years, the Department has ramped up its effort and it intends to be less accommodating, with regard to resolution of specific cases, after the end of 2012. As of the time of the audit (October, 2012) DNR was anticipating the finalization of a new, stronger procedure for handling encroachment cases. To avoid a possible non-conformity, DNR should:</p> <ul style="list-style-type: none"> • Finalize and implement the revised procedure • Provide support to field staff dealing with encroachment • Endeavor to improve on the current approach of checking only 10% of State Forest boundary lines per year (10-year cycle). 	
FME response	MDNR has continued to implement an “Encroachment Resolution Initiative” (ERI)

<i>(including any evidence submitted)</i>	<p>for the purpose of resolving some historical and structural trespass cases. As part of this effort, a few new contacts related to structures, claims to rights for access, and fence encroachments have been submitted.</p> <p>91 of 192 ERI cases have been resolved. Resolution of the remaining 101 ERI cases is in progress. In addition, there is a concerted effort to resolve 323 more minor encroachments which are linked to but not part of the ERI effort. MDNR trespass data base tracks all these resolved cases.</p>
SCS review	<p>In August 2013, MDNR updated its draft Non-timber trespass resolution procedure. While progress on taking action against non-timber trespass increased substantially in 2013, the updated procedure is still in draft form and results on MDNR's increased action against non-timber trespass have not been incorporated into its policies and procedures, SCS recommends that the OBS be sustained.</p>
Status of CAR:	<p><input type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input checked="" type="checkbox"/> <i>Other decision (refer to description above)</i></p>

Finding Number: 2012.4	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<p><input type="checkbox"/> Pre-condition to certification</p> <p><input type="checkbox"/> 3 months from Issuance of Final Report</p> <p><input type="checkbox"/> Next audit (surveillance or re-evaluation)</p> <p><input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.</p>
FSC Indicator:	Indicator 6.3.a.1 and Indicator 6.3.f
Non-Conformity: Not applicable	
Observation: On the basis of individual initiative, some field foresters are designating small patch reserves within aspen clearcuts for the purpose of creating, over time, pockets of over-mature/senescent habitat conditions in that cover type. Conformity to Indicators 6.3.a.1 and 6.3.f would be enhanced if this approach to regeneration harvesting in the aspen cover type were more broadly practiced on the State Forests.	
FME response <i>(including any evidence submitted)</i>	See discussion in "Management Review Response to Finding 2012.4."
SCS review	While SCS observed instances of retention during all harvest areas observed in 2013, there has been little incorporation of the results of the discussion on retention of dominant species into field-level decisions. Moreover, retention of

	dominant aspen crown classes tends to occur close to the edges of timber sale boundaries. MDNR’s tracking system for these retained areas does not include a method for ensuring that they do not become a part of a timber sale in an adjacent stand or compartment. Given this evidence, this OBS is upgraded to a minor CAR.
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2012.5	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
FSC Indicator:	Indicator 7.3.a
Non-Conformity: Not applicable	
Observation: With the transfer of many State Forest campgrounds, pathways and boat ramps to DNR’s Parks and Recreation Division, PRD personnel now play a direct role in implementing State Forest policies that are central to FSC certification. Accordingly, it is important that training of relevant PRD personnel is consistently and expeditiously pursued, state wide. As of October 2012, the transition and training process for PRD personnel was observed to be varied across the state forest system.	
FME response <i>(including any evidence submitted)</i>	See “Forest Recreation Program Transition Update,” and Regional Meeting attendance records and Agendas (April 23 and May 1, 2013).
SCS review	MDNR demonstrated evidence that trainings for PRD staff on FSC requirements in 2013. Topics covered included work instructions, audit planning and logistics, background on forest certification, and other relevant topics. During the 2013 audit, PRD staff that accompanied the audit team demonstrated an awareness of FSC requirements on site visits involving multiple-use objectives.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2012.6	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
FSC Indicator:	Indicator 5.4.b and Indicator 5.5.a
Non-Conformity: Not applicable.	
<p>Observation: To enhance the benefits they generate to the citizenry of Michigan and to enhance the diversity of State Forest land uses, the Hunter Walking Trails located on the State Forests could be more effectively made known through:</p> <ul style="list-style-type: none"> • Including their locations on maps made available to the public • Improving their signage • Connecting the Hunter Walking Trail program more effectively with the hunting public, through MI Hunt. 	
FME response <i>(including any evidence submitted)</i>	See "Michigan Hunting Heritage Grant Application 2011," which details information on hunting and trapping opportunities in the State, hunter education, use of social media to connect with hunters and provide them information on cover types and travel logistics, GPS resources, etc.
SCS review	MDNR has demonstrated that it is taking action to provide access to information on walking trail locations, MI Hunt, and hunter education.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

4.2 New Corrective Action Requests and Observations

Finding Number: 2012.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit. Note: this OBS is being carried over for another year.
FSC Indicator:	Indicators 1.5.a and 1.5.b
Non-Conformity: Not applicable	
<p>Observation: A chronic problem that DNR has had to deal with is unauthorized encroachment onto State Forest lands by neighbors (e.g., private structures or roads partially or entirely located on State Forest land). As the problem has grown, DNR has initiated policies, initiatives and actions aimed to control encroachment. In the last few years, the Department has ramped up its effort and it intends to be less accommodating, with regard to resolution of specific cases, after the end of 2012. As of the time of the audit (October, 2012) DNR was anticipating the finalization of a new, stronger procedure for handling encroachment cases. To avoid a possible non-conformity, DNR should:</p> <ul style="list-style-type: none"> • Finalize and implement the revised procedure • Provide support to field staff dealing with encroachment • Endeavor to improve on the current approach of checking only 10% of State Forest boundary lines per year (10-year cycle). 	
FME response 2013 <i>(including any evidence submitted)</i>	<p>MDNR has continued to implement an “Encroachment Resolution Initiative” (ERI) for the purpose of resolving some historical and structural trespass cases. As part of this effort, a few new contacts related to structures, claims to rights for access, and fence encroachments have been submitted for resolution.</p> <p>91 of 192 ERI cases have been resolved. Resolution of the remaining 101 ERI cases is in progress. In addition, there is a concerted effort to resolve 323 more minor encroachments which are linked to but not part of the ERI effort. MDNR trespass data base tracks all these resolved cases.</p>
SCS review 2013	<p>In August 2013, MDNR updated its draft non-timber trespass resolution procedure. While progress on taking action against non-timber trespass increased substantially in 2013, the updated procedure is still in draft form and results of MDNR’s increased action against non-timber trespass have not been incorporated into its policies and procedures. The “case load” of documented encroachments has stabilized but much work remains to resolve all known instances. SCS concludes that the OBS should be kept open for another year to enable MDNR to</p>

	report on further progress at the time of the 2014 surveillance audit.
FME response 2014 <i>(including any evidence submitted)</i>	
SCS review 2014	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2013.1	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator(s): FSC-US 6.3.a.1 and Indicator 6.3.f	
Non-Conformity:	
<p>Aspen harvests include retention of trees in groups and individuals consisting mainly of oak and conifer species or existing snags. Within aspen harvest units, especially those maintained under shorter rotations, retention of older aspen age classes in larger clearcuts (e.g., >40 acres) is frequently limited to the edges of timber sale boundaries for operational efficiency. While this retention is noted within the prescription for the timber sale and would hopefully then be referenced in planning future harvests of the same stand, this retention currently is not tracked in the IFMAP system that is used for planning forest harvests. Aspen retained along timber sale boundaries for the purposes of maintaining a representative portion of a stand could be confused as being part of an adjacent stand or compartment that was not recently harvested. MDNR therefore risks losing this under-represented successional stage of aspen in the FMU (Indicator 6.3.a.1).</p> <p>Auditors observed oak-pine, northern hardwood, aspen, and conifer-hardwood swamp harvests in 2013. Snags and other woody debris were observed in all harvest units. Retained groups and individuals usually are conifers and oaks in aspen stands with smaller diameter aspens incidental to this retention. Non-aspen harvests include retention of dominant species throughout various diameter classes. Most areas include retention of trees representative of dominant species, with the exception of aspen harvests, where larger sized aspens are either not retained or are retained at harvest unit edges where they risk being taken during the harvest of an adjacent compartment/ stand. While MDNR included a discussion of options for retention based on species composition, dominance, opening size and other factors, incorporation of these retention options into MDNR guidelines for all districts was not completed by the time of the 2013 audit. MDNR risks failure to maintain or recruit habitat components and stand structures cited in Indicator 6.3.f associated with dominant species in aspen harvests.</p>	
Note: See also OBS 2012.4.	

Corrective Action Request:	
Particularly with respect to the layout and execution of aspen harvest units MDNR must develop and implement a means of tracking area retention to:	
<ul style="list-style-type: none"> • Maintain, enhance, and/or restore under-represented successional stages that would naturally occur on the types of sites found on the FMU. • Ensure that its management systems maintain, enhance, or restore habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes, with an emphasis on measures to retain dominant species found on the site. 	
FME response 2014 <i>(including any evidence submitted)</i>	
SCS review 2014	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2013.2	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator(s): FSC-US 6.3.a.2, 6.4.a, 6.4.b, 6.4.c, 6.4.d, 6.4.e.	
Non-Conformity:	
<p>From the 2012 audit findings:</p> <p>Throughout much of 2012, development of the Regional State Forest Management Plans required the dedication of staff resources that, to a substantial degree, were redirected from the Biodiversity Conservation Planning Process. Now that the RSFMP process is largely completed, it is important that staff resources are rededicated to completion of the BCPP/BSA process, which has suffered from numerous delays since at least 2008. Completion of the Biodiversity Conservation Planning Process, including key tasks such as delineating Biodiversity Stewardship Areas on the state forests and identifying compatible land uses for the BSAs, has been the focus of numerous FSC Findings since 2008 (CAR 2008.1, CAR 2009.1, OBS 2010.9, OBS 2010.19). The credibility of the FSC certification process as applied to Michigan DNR is not enhanced by this protracted delay.</p> <p>In the 12 months between the 2012 and 2013 annual audits, MDNR's Statewide Biodiversity Team completed a statewide assessment/identification of potential BSA's. The results of the statewide assessment were conveyed to the DNR Resource Bureau Management Team on April 9, 2013, accompanied by an Issues Statement. Within the Issues Statement, three possible options for proceeding with the Living Legacies Initiative were outlined. These options were:</p>	

1. Do nothing at the present time.
2. Proceed with the current approved Living Legacy Implementation process—Internal to DNR
3. Develop a new process for conserving biodiversity to meet forest certification requirements.

At the opening meeting of the 2013 annual audit, the SCS audit team was informed that no response to or actions resulting from the April 9th submittal had as yet been issued by the Resource Bureau Management Team. The audit team construes this to mean, at least on a de facto basis, that MDNR has elected Option 1, to do nothing.

After many years of addressing the underlying issues through numerous certification findings, the lack of any action since April 9, 2013 and the ongoing failure to complete a pathway for demonstrating compliance with FSC Indicator 6.3.a.2 and Indicators 6.4.a, b, c*, d, and e, the audit team is left with no choice but find that MDNR is in Major Non-Compliance with those elements of the FSC certification standard.

*NOTE: The 2008 Michigan State Forest Management Plan (pages 183-184) and Forest Certification Work Instruction 1.4 define allowable management activities that are compatible with or necessary to maintain RSAs; however, how RSAs are managed is integral to the larger discussion about re-defining and updating the network of RSAs. Given this, the work instruction may or may not need to be modified once MDNR completes its RSA assessment.

Corrective Action Request:

MDNR must submit to SCS a written plan of action, endorsed by the Resource Bureau Management Team, for establishing a network of designated areas on the lands administered by the Department. The network of designated areas must be fully responsive to the requirements for representative sample areas (6.4.a.-6.4.e) and protected areas (6.3.a.2). The network must include representative samples of more common (S4 and S5) natural communities as well as rare ecological communities (S1, S2 and S3).

The plan of action must include timelines, milestones and allocation of staff resources that collectively provide clear indication that the designation of said areas will be completed and duly formalized by the time of the 2014 annual surveillance audit.

FME response 2014

(including any evidence submitted)

SCS review 2014

Status of CAR:

- Closed
- Upgraded to Major
- Other decision *(refer to description above)*

Finding Number: 2013.3

Select one: Major CAR Minor CAR Observation

FMU CAR/OBS issued to (when more than one FMU):

Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator(s): FSC-US indicators 6.5.b and 6.5.e.1.	
Non-Conformity: An incident was observed during the 2013 surveillance audit in which harvesting operations did not meet or exceed Best Management Practices (BMPs) that address riparian management zones (RMZs) for vernal pools. Trees were felled into a vernal pool and trees were not reserved from harvest around the entire periphery of the vernal pool, per the State DEQ BMP manual (p. 29).	
Corrective Action Request: MDNR must ensure that forest operations meet or exceed Best Management Practices (BMPs) that address allowable and non-allowable activities in RMZs.	
FME response 2014 <i>(including any evidence submitted)</i>	
SCS review 2014	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2013.4	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): CAR was closed on Oct 23 following verification that appropriate action was taken by the Department.
FSC Indicator(s): FSC-US indicator 6.7.b.	
Non-Conformity: An incident was observed during the 2013 surveillance audit in which a spill of hydraulic fluid occurred in a mechanized harvest unit where there was a failure to immediately contain the material and to complete disposal and remediation procedures, as required by DNR's sales contract terms and by applicable law.	
Corrective Action Request: In the event of a hazardous material spill, MDNR must ensure that responsible parties immediately contain the material and engage qualified personnel to perform the appropriate removal and remediation, as required by applicable law, regulations and contract terms.	
FME response <i>(including any evidence submitted)</i>	On October 23, 2013, DNR submitted the following response: Robert and Kyle,

	<p>I am forwarding to you a copy of the letter that we sent to the operator on the Russell Lake Aspen timber sale which we visited during the audit on October 10. This letter is a standard follow-up action after the sale administrator (Dale Ekdom) first observed and documented the operator contract violation of not immediately cleaning up a hydraulic oil spill on the site (see the attached Timber Sale Inspection report). A record of a follow-up inspection on October 14 is also attached, which documents that proper corrective action had been completed by the operator.</p> <p>We believe that the focus of the audit should be on our procedures for timber sale administration and inspections and any needed follow-up actions, rather than the occurrence of a contract violation by the operator. Contract violations are a matter beyond DNR control and will occasionally occur despite the best procedures and intentions of the DNR and our contractors. What is most important is that when contract of BMP violations are observed, they are documented and immediate corrective action is taken – as was done in this instance.</p> <p>Thanks for your consideration.</p> <p>Regards,</p> <p>David Price MI DNR Forest Resources Division 517-241-9051 priced1@michigan.gov</p>
<p>SCS review</p>	<p>On October 23, 2013, SCS conveyed the following response to MDNR:</p> <p>Hello David (and Dennis, Deb and Steve):</p> <p>Thanks for forwarding the letter sent to the Russell Lake Aspen timber sale operator as well as the record of the follow-up inspection.</p> <p>You suggest that perhaps we should not raise a non-conformity with respect to a contract violation (an unattended hydraulic fluid spill) and, instead, focus on DNR’s timber sale administration and inspection procedures. In fact, we are expected to focus on both procedures and field-level instances that may constitute a non-conformity with the FSC certification standard.</p> <p>In this instance, there was a hydraulic fluid spill that clearly was not addressed/remediated immediately. Irrespective of DNR’s procedures, this incident constitutes a minor non-conformity relative to Indicator 6.7.b:</p> <p style="padding-left: 40px;">“In the event of a hazardous materials spill, the forest owner or manager <i>immediately</i> contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.” (emphasis added)</p>

Based upon this year’s audit and all the prior audits, we consider this to be an isolated (non-systemic) incident which is why it is raised as a minor non-conformity.

The Minor CAR that will be part of the pending audit report will request DNR to take appropriate actions to reasonably assure that this incident not be repeated. Since it is considered by the audit team to be an isolated incident, the audit team has already concluded that the incident is not indicative of a problem with DNR’s timber sale administration and inspection procedures. Had we concluded that were the case, it would be a systemic issue and we would have been obligated to raise a major rather than minor non-conformity.

Subsequent to the audit team (and DNR) observing this minor non-conformity, DNR has taken corrective actions in the form of sending a letter to the operator and conducting a follow-up site inspection. I will discuss this response with the other team members and it is possible that we will consider DNR’s responsive actions to be sufficient to close the non-conformity. If so, the report will reflect that a non-conformity was observed and raised on October 10th and closed on October 23rd. I suspect this will be the case but I cannot say so with certainty until conferring with my colleagues.

Subsequent to the October 23rd response to DNR, the SCS Lead Auditor, in consultation with Kyle Meister, concluded that closure of this Minor CAR was warranted on the basis of the corrective actions undertaken by DNR.

Status of CAR:

Closed

Upgraded to Major

Other decision (refer to description above)

Finding Number: 2013.5	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
FSC Indicator(s): FSC-US 9.1.a.	
Non-Conformity (or Background/ Justification in the case of Observations): Draft guidance from FSC-US under HCV3 states that “Roadless areas are forested areas without evidence of roads or skid trails.” Further draft guidance from FSC-US provides guidance on size of roadless areas: “500 acres is a general size guideline, not a definitive minimum, and generally applies to ‘block’ shaped	

<p>areas rather than linear figures such as riparian zone.” Interviews with MDNR staff indicate that there is no definition for roadless area within the current management framework.</p> <p>The intent of HCV3 is to protect forest areas that are in or contain rare, threatened or endangered (RTE) ecosystems. Not all roadless areas contain RTE ecosystems; Michigan contains some large ecotypes that cover large acreages due to landform and soil parent material, but are not necessarily RTE ecosystems (e.g., boreal forest elements).</p>	
<p>Corrective Action Request (or Observation): MDNR should consider completing an assessment of roadless areas (using the definition in the final draft FSC-US HCVF Assessment Framework), and identify any roadless areas that may meet the intent of HCV3 and are relatively large (i.e., >500 acres) and intact with no evidence of past or current road building.</p>	
<p>FME response (including any evidence submitted)</p>	
<p>SCS review</p>	
<p>Status of CAR:</p>	<p><input type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

5. Stakeholder Comments

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the certification process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME’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 (HCVFs).

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, 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 in this evaluation:

5.1 Stakeholder Groups Consulted

Adjacent private forestland managers	Forest and wildlife management consultants
Other state government	

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the

SCS Interim Standard, if one was used. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

5.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

<input type="checkbox"/> FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.	
Stakeholder comments	SCS Response
Economic concerns	
Several comments were received about the economic losses on working forestland due to impacts of excessive deer browse on private lands near MDNR-managed lands.	Michigan’s deer population management policies affect private lands, and public land included in and out of the scope of the FSC certificate. FSC certification may attend to comments received on MDNR-managed lands within the scope and to impacts on lands adjacent MDNR-managed lands within the scope; however, MDNR is not the only player in establishing Michigan’s deer population policies. At the regional level, the local population can heavily influence deer policies (for example, the number of antlerless permits issued or not). The stakeholders who made this comment can continue to work with MDNR and other groups to influence deer management policies. On FMUs visited during the 2013 annual audit, SCS found that DNR’s management practices are allowing for sufficient and well-distributed regeneration. However, MDNR staff have noted that it continues to have issues in regenerating oak species on certain sites. This is like due to several factors, including initial oak densities on a given site; mast years; changes in natural disturbance regimes (e.g., fire); competition from mid- to high-tolerant species; loss of other tree species due to disease and subsequent alteration of stand dynamics; and deer browse. MDNR is actively seeking solutions for oak regeneration, and its policies of retention of oaks of various size classes should help to reduce the risk of loss of these species from a given site.
Social concerns	
None received.	
Environmental concerns	
None received.	

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME’s response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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Comments:

7. Changes in Certification Scope

Any changes in the scope of the certification since the previous audit are highlighted in **yellow** in the tables below.

Name and Contact Information

Organization name	Michigan Department of Natural Resources		
Contact person	David Price, Forest Certification Coordinator		
Address	DNR Forest Resources Division P.O. Box 30452 Lansing, MI 48909-7952	Telephone	517-241-9051
		Fax	517-373-2443
		e-mail	priced1@michigan.gov
		Website	

FSC Sales Information

FSC salesperson	Same as above		
Address		Telephone	
		Fax	
		e-mail	
		Website	

Scope of Certificate

Certificate Type	<input checked="" type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)	NA	
Number of FMU's in scope of certificate	1	
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude: Approximately 43-48 degrees, north latitude, Approximately 83-90 degrees, west longitude	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
privately managed		
state managed	3.8 million acres (excludes military lease lands, Luce County lease lands, GMO excised croplands, Wildlife Management Areas without FMD co-management)	
community managed		
Number of FMUs in scope that are:		

less than 100 ha in area		100 - 1000 ha in area	
1000 - 10 000 ha in area		more than 10 000 ha in area	1
Total forest area in scope of certificate which is included in FMUs that:			Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac
are less than 100 ha in area			
are between 100 ha and 1000 ha in area			
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs			
Division of FMUs into manageable units:			

Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	Approximately 2.9 million acres
Area of production forest classified as 'plantation'	None
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	Approximately 600,000 acres
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	Approximately 1.8 million acres
Silvicultural system(s)	Area under type of management
Even-aged management	
Clearcut (clearcut size range 5-23 acres)	Approximately 1.7 million acres
Shelterwood	Approximately 100,000 acres
Other:	Not quantified
Uneven-aged management	
Individual tree selection	Approximately 500,000 acres
Group selection	Not quantified
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Approximately 53,000 acres or about 750,000 cords
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	Ecological Reference Areas, Natural Areas, Potential Old Growth, Natural River buffers, and critical dunes, Type 1 & 2 Old Growth: Approximately 190,000 acres
Other areas managed for NTFPs or services	None
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	None
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest	

rates estimates are based:
IFMAP and GIS
Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i>
Black ash (<i>Fraxinus nigra</i>); green ash (<i>Fraxinus Pennsylvanica</i>); white ash (<i>Fraxinus Americana</i>); bigtooth aspen (<i>Populus grandidentata</i>); Trembling aspen (<i>Populus tremuloides</i>); balm of Gilead (<i>Populus balsamifera</i>); balsam fir (<i>Abies balsamea</i>); basswood (<i>Tilia Americana</i>); paper birch (<i>Betula papyrifera</i>); yellow birch (<i>Betula alleghaniensis</i>); white cedar (<i>Thuja occidentalis</i>); black cherry (<i>Prunus serotina</i>); Eastern Hemlock (<i>Thuja Canadensis</i>); sugar maple (<i>Acer saccharum</i>); red maple (<i>Acer rubrum</i>); northern red oak (<i>Quercus rubra</i>); northern pin oak (<i>Quercus ellipsoidalis</i>); white oak (<i>Quercus alba</i>); jack pine (<i>Pinus banksiana</i>); red pine (<i>Pinus resinosa</i>); white pine (<i>Pinus strobes</i>); black spruce (<i>Picea ,mariana</i>); white spruce (<i>Picea glauca</i>); tamarack (<i>Larix laricina</i>);

FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1	W1.1 Roundwood	All
W1	W1.2 Fuel Wood	All
W1	W1.3 Twigs	All
W3	W3.1 Wood chips	All
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
N1 Bark		All

Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	Approximately 190,000 acres comprised of: Dedicated and Proposed Natural Areas, National Natural Landmarks, TNC Natural Area Registry, Critical Dunes, Natural Rivers, Ecological Reference Areas, and Potential Old Growth Areas, and Type 1 & 2 Old Growth. Note: These areas are not mutually exclusive of the HCV Types as described below.		
High Conservation Value Forest/ Areas			
High Conservation Values present and respective areas:			
Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac			
Code	HCV Type	Description & Location	Area
<input checked="" type="checkbox"/>	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Designated Critical Habitat Kirtland’s Warbler and Piping Plover habitat.
			150,707 Acres

<input checked="" type="checkbox"/>	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.	Dedicated Management Areas, Dedicated State Natural Areas, and Natural Rivers.	93,167 Acres
<input checked="" type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Critical Dunes, Coastal Environmental Areas and Ecological Reference Areas.	50,118 Acres
<input type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	None located upon the Michigan State Forest system.	
<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	None located upon the Michigan State Forest system.	
<input checked="" type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	The Michigan DNR currently utilizes other mechanisms to identify, conserve, and manage areas critical to local communities' traditional cultural identity such as THPO, SHPO, Compartment Review, land use permits, and designation as "Special Conservation Areas".	
Total Area of forest classified as 'High Conservation Value Forest/ Area'				293,992 Acres

Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.	
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.	
<input checked="" type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.	
Explanation for exclusion of FMUs and/or excision:	Land is excluded from the DNR's FSC Certificate primarily because the DNR does not exercise full control over management activities, or because the purposes for which the lands are held are not necessarily benefited by forest certification (e.g. the lands are not jointly co-managed by the DNR Forest Management and Wildlife Divisions and are devoted primarily to Wildlife or Fisheries management or State Parks).
Control measures to prevent mixing of certified and non-certified product (C8.3):	Any timber harvests in non-certified forests are not sold or advertised as certified. Fisheries Research/ Hatcheries and agricultural areas are outside of the scope of FSC certification as no forest products or services are directly managed.
Description of FMUs excluded from or forested area excised from the scope of certification:	
Name of FMU or Stand	Location (city, state, country) Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)

Long Term Military Lease Lands	Otsego, Crawford, and Kalkaska Counties in the Northern Lower Peninsula of Michigan	101,567 acres
Lands Leased to Luce County	Luce County in the Upper Peninsula of Michigan	2,786 acres
Michigan State Park System	Throughout Michigan	286,000 acres
Wildlife Management Units administered by DNR Wildlife Division	Primarily located in the Southern Lower Peninsula of Michigan	350,000 acres
Fisheries Research Areas/Hatcheries	Southern and Northern Lower Peninsula of Michigan	4,145 acres
Lands available for planting to GMO corn/soybeans	Northern Lower Peninsula of Michigan	424 acres

8. Annual Data Update

8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
# male workers: 475	# female workers: 88	
Number of accidents in forest work since last audit	Serious: 129 in 2013 (Q1-Q3)	Fatal: None in 2013

8.2 Annual Summary of Pesticide and Other Chemical Use

<input type="checkbox"/> <i>FME does not use pesticides.</i>				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year	Reason for use
Rodeo Arsenal Escort	glyphosate imazapyr metsulfuron-methyl	.08 gal/acre .01 gal/acre .17 oz/acre	116.4 acres	Right of way herbicide application
Razor Pro	Glyphosate	2 qts/acre	< 1 acre	Four (4) bare ground treatments at electric sub stations to control grass
Tordon Bullseye Rodeo Polaris	picloramglyphosate glyphosate imazapyr	1-2 qts/ac 50-100gal/ac 2-3 gal/acre 20oz/acre	28 lineal miles by 20' - 67.2 acres	Right of way herbicide application
Polaris Rodeo	imazapyr glyphosate	.5-6 oz/acre 6-128 oz/acre	20 lineal miles by 20' wide =	Right of way herbicide

Garlon	triclopyr	25% solution	48 acres	application
Garlon 3A	Tryclopyr	20 lbs/ac	10.57 ac	Garlic Mustard treatment
Cornerstone Plus	Glyphosate (41%)	2 qts\ac	20 acres	Second application of herbicide (first application in fall, FY 12) in preparation for new seeding. Sharecropping agreement.
Roundup	Glyphosphate	27.5 lbs	10 acres	Site Prep for new seeding
Killz all	Glyphosphate	1 qt	0.75 acres	Site prep for native prairie demo site at Norway F.O.
Rodeo	Glyphosate	0.66 gal.	1.85 acres	Phragmites control at Portage Bay State Forest Campground.
Aqua Neat Rodeo	Glyphosate Glyphosate	12.4 gal. 0.25 gal.	12.4 acres Spot spray	Phragmites control at Portage Marsh and Ford River mouth.
Aquaneat	Glyphosate 53.8%	19.5 gallons	26 acres	Non-native phragmites
Rodeo	Glyphosate 53.8%	236.56 ounces	6.2 acres	Non-native phragmites
Aquaneat	Glyphosate 53.8%	19.5 gallons	26 acres	Non-native phragmites
Rodeo	Glyphosate	6 pints/ac.	<.1 acre	Phragmites australis
Cygnat	Limonene	1 pint/ac	<.1 acre	Phragmites australis
Hi light	Trace dye	.75 oz/ac	<.1 acre	NA
Rodeo	Glyphosate	60lb or 7.5 gal	5.4 acre	Invasive plant
Rodeo	Glyphosate	231 gal	433 acres	Red pine site prep
Rodeo	Glyphosate	69 gal	183 acres	Red pine release
Rodeo	Glyphosate	0.4 gal	.1 acres	Raspberry study
Rodeo	Glyphosate	15		Red Pine Site Prep
Rodeo	Glyphosate	15		Jack Pine Site Prep

Rodeo	Glyphosate	7.5		Jack Pine Site Prep
Rodeo	Glyphosate	13.5		Jack Pine Site Prep
Rodeo	Glyphosate	44.62 gal	119 acres	Release Red Pine
Rodeo	Glyphosate	25.5 gal	34 acres	Site Prep/Release Red Pine
Rodeo	Glyphosate	18.75 gal	50 acres	Release Red Pine
Rodeo	Glyphosate	11.62 gal	30 acres	Release Red Pine
Rodeo	Glyphosate	12.75 gal	31 acres	Release Red Pine
Rodeo	Glyphosate	11.25 gal	34 acres	Release Red Pine
Rodeo	Glyphosate	56.22 (gal)	73 acres	Site Prep Red Pine
Rodeo	Glyphosate	28.11 (gal)	37 acres	Site Prep Red Pine
Rodeo	Glyphosate	36.69 (gal)	95 acres	Release Red Pine
Rodeo	Glyphosate	9.37 (gal)	24 acres	Release Red Pine
Rodeo	Glyphosate	50.71 (gal)	71 acres	Site Prep Red Pine
Rodeo	Glyphosate	16.8 (gal)	40 acres	Release Red Pine
Rodeo	Glyphosate	18.74 (gal)	19 acres	Site Prep Red Pine
Rodeo	Glyphosate	19.10 (gal)	50 acres	Release Prep Red Pine
Rodeo	Glyphosate	16 gal.	159.6 acres	Brush Control
Arsenal P'line	Imazapyr	0.9 gal.	148.8 acres	Brush Control
Escort XP	Metsulfuron	29 oz.	148.8 acres	Brush Control
Garlon 3A Escort XP	Triclopyr Metsulfuron Methyl	4.5 Gals. 12 Oz.	6.06 Acres	To control all brush in CRFY21 Power Line R.O.W.
Garlon 3A Escort XP	Triclopyr Metsulfuron Methyl	94 Gals. 249 Oz.	124.24 Acres	To control all brush in Power Line R.O.W.
Garlon 3A Escort XP	Triclopyr Metsulfuron Methyl	46 Gals. 122 Oz.	60.60 Acres	To control all brush in NLKG31 Power Line R.O.W.
Garlon 3A Escort XP	Triclopyr Metsulfuron Methyl	43 Gals. 114 Oz.	56.81 Acres	To control all brush in Chandler Power Line R.O.W.

Garlon 3A Escort XP	Triclopyr Metsulfuron Methyl	6 Gals. 15 Oz.	7.5 Acres	To control all brush in Gladstone Power Line R.O.W.
Garlon 3A Escort XP	Triclopyr Metsulfuron Methyl	17 Gals. 44 Oz.	21.81 Acres	To control all brush in Lakehead Power Line R.O.W.
Garlon 3A Escort XP	Triclopyr Metsulfuron Methyl	46 Gals. 121 Oz.	60.60 Acres	To control all brush in M-38 Power Line R.O.W.
Garlon 3A Escort XP	Triclopyr Metsulfuron Methyl	7 Gals. 18 Oz.	9.09 Acres	To control all brush in Ontonagon 138 Power Line R.O.W.

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected For Evaluation

FME consists of a single FMU

FME consists of multiple FMUs or is a Group

Appendix 2 – List of Stakeholders Consulted

List of FME Staff Consulted

<p>Field Audit Plan Listed participants should plan to attend entire field day with the following Exceptions: NA= not available, O= be available at opening meeting but welcome to attend field portion if available, S=will not attend audit but will standby and be available if needed, T= available for telephone call</p>			
	<i>TUESDAY</i>	<i>WED</i>	<i>THURS</i>
	8-Oct	9-Oct	10-Oct
	PRC FMU	GRAYLING FMU	ROSCOMMON FMU
Name			
BILL O'NEILL, FRD Division Chief			
RUSS MASON, WLD Division Chief			
DOUG REEVES, WLD Assistant Chief			
DENNIS KNAPP, DNR Tribal Coordinator			
SCOTT HEATHER, FRD Assistant Division Chief	X	X	X
PENNEY MELCHOIR, WLD Field Coordinator	X	X	X
DEBBIE BEGALLE, FRD Forest Plans and Ops Section Manager		X	X
DAVID PRICE, Unit Supervisor, Forest Planning and Inventory	X	X	X
SCOTT JONES, FRD Forest Planning Specialist	X		
AMY EAGLE, FRD Biodiversity Conservation Program Leader	X		
BETH CLUTE, FRD Promotional Agent	X		
LORI BURFORD, FRD Trespass Specialist	X		
ANNA SYLVESTER, PRD NLP and UP Field Coordinator	X		
DENNIS NEZICH, FRD Field Coordinator	X	X	X
DNR DISTRICT FIELD staff			
FRD DISTRICT SUPERVISOR	Steve Milford	Steve Milford	Bill Sterrett
FRD TIMBER MGT SPECILAIST	Tim Greco	Tim Greco	Scott Throop

FRD DISTRICT PLANNER	Dan Heckman	Dan Heckman	Tom Haxby
PRD DISTRICT MANAGER	Rich Hill	Dan Mullen	Dan Mullen
PRD UNIT MANGER	Charlie Maltby	Greg Kinser	Mark Buchinger
PRD TRAIL SPECIALIST	Paige Perry	Amy Swainston, Paige Perry	Amy Swainston, Paige Perry
FMU Land Use Specialist (standby if needed)	Gfreg Gatesy	Ken Phillips	Jerry Grieve
WLD REGIONAL SUPERVISOR	Not Needed	Not Needed	Not Needed
WL BIOLOGIST SUPERVISOR	Brian Mastenbrook	Brian Mastenbrook	Brian Mastenbrook
WLD ECOLOGIST	Vacant	Vacant	Vacant
LED DISTRICT SUPERVISOR	Lt Jim Gorno	SGT Glen Gutierrez	SGT Glen Gutierrez
FD MANAGEMENT UNIT SUPERVISOR	Dave Borgeson	Dave Borgeson	Mark Tonello
DNR FMU FIELD staff			
FRD UNIT MANAGER	Scott Whitcomb	Susan Thiel	Steve Anderson
FRD FIRE SUPERVISOR	Don Klingler	Michael Janisse	Jake Figley
FRD FORESTERS/TECHNICIANS	Greg Rekowski, Rich McDonald	Joan Charlebois, Matt Foster, Pat Mohny, Tom Barnes, Scott Shooltz, Pat Potter	Ben Wiese, Jason Lewicki, Doug Bates, Dale Eksom
FRD FIRE OFFICERS	N/A	Jack Money, Joel Money	Randy Hartman, Nate Stearns
WLD HABITAT BIOLOGIST	Brian Mastenbrook, Mark Monroe	Brian Piccolo, Keith Fisher (KW Mgmt)	Mark Boerson, Keith Fisher (KW Mgmt)
WLD TECHNICIAN/ASSISTANT	None	None	Bill Radtke
FISHERIES BIOLOGIST	Tim Cwalinski	Tim Cwalinski	Mark Tonello
LED CONSERVATION OFFICER	CO Nick Torsky	CO John Huspen	CO Bobbi Lively
FMU OFFICE SECRETARY (on standby if needed)	None	Lori Ruff	Lynn Carter-Regier

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Bill Cook	MSU Extension	cookwi@anr.msu.edu	Email	
Pete Squibb	Wildlife Solutions, LLC	psquibb61@gmail.com	Email	Yes

Dave Fehringer and Alex Finkral	The Forestland Group	dave@forestlandgroup.com , alex@forestlandgroup.com	Email	
Gerald Grossman	Grossman Forestry	gfcou@up.net	Email	Yes

Appendix 3 – Additional Audit Techniques Employed

There were no additional audit techniques employed during the 2013 annual surveillance audit.

Appendix 4 – Pesticide Derogations

<input type="checkbox"/> There are no active pesticide derogations for this FME.		
Name of pesticide / herbicide (active ingredient)		Date derogation approved
FSC-DER-30-001-USA 2,4-D 2-ethylhexyl ester		January 5, 2010
FSC-DER-30-001-USA Dicamba		January 5, 2010
FSC-DER-30-001-USA Diflufenzuron		January 5, 2010
FSC-DER-30-001-USA Hexazinone		January 5, 2010
Condition	Conformance (C / NC)	Evidence of progress
		MDNR did not use any chemicals permitted through its derogations in 2012-2013. Instead, alternative chemical formulations have been used.

Appendix 5 – Detailed Observations

Evaluation Year	FSC P&C Reviewed
2010	All – (Re)certification Evaluation
2011	C1.5, C1.6, C2.3, C3.2, C3.3, C4.2, C4.4, C5.6, C6.2, C6.3, C6.4, C6.5, C7.1, C7.2, C7.3, C8.1, C8.2, C8.5, C9.3, C9.4,
2012	C1.2, C1.3, C1.4, C1.5, C1.6, C2.1, C2.2, C4.1, C4.3, C4.5, C5.1, C5.2, C5.3, C5.4, C5.6, C6.4, C6.7, C6.8, C7.2, C7.3
2013	1.1, 1.5, 2.3, 3.1, 3.2, 3.4, 4.2, 4.4, 5.5, 5.6, 6.1, 6.2, 6.3, 6.6, 6.9, 6.10, 7.4, 8.2, 8.4, 9.1, 9.2, and 9.4
2014	

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

REQUIREMENT	C/NC	COMMENT/CAR
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P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
C1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
1.1.a. Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.	C	MDNR presented the audit team with an update on new legislation and director's orders that determine the direction of forest management on state lands. The draft state forest management plan is being written taking the updated laws and other administrative requirements into account. No violations were reported to the CB.
1.1.b. To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	C	Internal audits are conducted against the certification-driven Work Instructions. The results of internal audits are shared with all employees. Interviews with MDNR personnel during the audit revealed a solid overall awareness and understanding of applicable laws, regulations and policies.
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	NE	
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	NE	
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	NE	
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the Forest Management Unit (FMU).	C	Illegal harvesting is handled by the local FMUs, with oversight and assistance provided by the Lansing Timber Sale Specialist, Law Enforcement Division, and FRD Trespass Specialist. MDNR tracks both timber and non-timber trespasses in a database. Timber and non-timber trespass reports can be generated through that data base. See additional response for Criteria 2.3. MDNR surveys timber harvest units near property boundaries as part of laying out timber sales in order to avoid encroachment and other trespass issues.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	See 1.5.a. There are active enforcement activities ranging from informal advice and warnings onto to tickets and civil/criminal prosecution.
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	NE	
P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	NE	
C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.	NE	

<p>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	<p>C</p>	
<p>2.3.a. If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p>	<p>C</p>	<p>MDNR has continued to implement an “Encroachment Resolution Initiative” (ERI) for the purpose of resolving some historical and structural trespass cases. As part of this effort, a few new contacts related to structures, claims to rights for access, and fence encroachments have been submitted.</p> <p>91 of 192 ERI cases have been resolved. Resolution of the remaining 101 ERI cases is in progress. In addition, there is a concerted effort to resolve 323 more minor encroachments which are linked to but not part of the ERI effort. MDNR trespass data base tracks all these resolved cases.</p>
<p>2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.</p>	<p>C</p>	<p>MDNR Trespass Specialist maintains the MDNR-wide tracking data base. There were 70 new trespass cases identified in FY13.</p>
<p>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p>		
<p>C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</p>	<p>NA</p>	<p>This Criterion is not applicable as the geographic scope of the certificate does not incorporate any tribal lands.</p>
<p>C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	<p>C</p>	
<p>3.2.a. During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.</p>	<p>C</p>	<p>MDNR has not identified any new significant impacts from management activities that likely would affect the resources or legal rights of tribes associated with the FMU in 2013. Some new areas were added to the Archeological Concerns Database in FY12.</p> <p>MDNR consultation occurs during management planning, including meeting with Tribes and involvement in management plan review, compartment review and permitting activities. Management plans and policies address strategies for consulting with governmental entities. Tribal interests are being very actively engaged in wildlife and fisheries planning processes.</p>
<p>3.2.b. Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.</p>		<p>Management plans and policies include guidance for protecting identified cultural and historic resources. The Office of the State Archaeologist database for historic and archaeological sites is utilized and kept current.</p>
<p>C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</p>	<p>NE</p>	
<p>C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest</p>	<p>NA</p>	<p>This Criterion is found to not be applicable to this certification evaluation as MDNR is not making commercial or operational use of traditional tribal</p>

<p>operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</p>		<p>knowledge.</p>
<p>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</p>		
<p>C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</p>	<p>NE</p>	
<p>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	<p>C</p>	
<p>4.2.a. The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p>	<p>C</p>	<p>The FRD safety policy (FRD Policy 121) has been updated. There were 129 accidents on the FMU through Q3 FY2013 that were reported to the required MIOSHA log.</p> <p>In all field offices visited, MDNR had the required state and federal legal postings available in places accessible to all employees. MDNR employees showed records for required harassment training.</p>
<p>4.2.b. The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</p>	<p>C</p>	<p>MDNR has not altered the language included in contracts in 2013. State procurement guidelines and standard contract address safety. MDNR has policies for addressing safety with employees, including protective gear, fire operations, etc. Staff members are issued radios for communication when engaged in field work.</p>
<p>4.2.c. The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p>	<p>C</p>	<p>Logging contractors interviewed mentioned SFI logger trainings and First AID/CPR. While First AID/CPR certificates were not current, most of the loggers encountered were sole proprietorships and therefore not subject to OSHA requirements. Sole proprietors become subject to OSHA requirements if they have employees, however (see http://www.justice.gov/usao/eousa/foia_reading_room/usam/title9/crm02012.htm and https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=76&p_table=TESTIMONIES).</p> <p>Logging contractors and their employees that were interviewed in the field during the 2013 audit all had first-aid kits on the work site.</p>
<p>C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p>	<p>NE</p>	
<p>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</p>	<p>C</p>	
<p>4.4.a. The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> Archeological sites and sites of cultural, historical and community significance (on and off the FMU; 	<p>C</p>	<p>No formal investigation of social impacts of MDNR operations has been conducted in 2013. However, the MDNR has begun discussions with faculty at Michigan State University regarding the incorporation of social science methodologies into future monitoring protocols. During the 2014 audit, progress in this</p>

<ul style="list-style-type: none"> • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p>		<p>dialogue and cooperation with MSU will be a focus of the audit team.</p> <p>MDNR also continues to conduct annual open houses and compartment reviews whereby social impacts and public input are considered in formulating treatment prescriptions.</p> <p>In FY13, FRD received 423 logged-letters, legislative requests, and e-mail requests for information. These requests for information are forwarded to appropriate staff and addressed as a part of routine work responsibilities. FRD also received and addressed 19 requests for information under the Freedom of Information Act (FOIA) in FY 13.</p> <p>Other social interactions include:</p> <ul style="list-style-type: none"> • Compartment reviews for Year of Entry 2014 were held in each Forest Management Unit. • Over 23,589 friends on the MDNR Facebook account. • Over 15,631 Twitter followers with over 5,400 tweets for the Lower Peninsula, and over 3,172 followers with over 1,450 tweets for the Upper Peninsula. <p>Through GovDelivery, the MDNR provided email communication to the lengthy lists of stakeholder subscribers on the following subjects:</p> <ul style="list-style-type: none"> • Assistance to Private Forestland Owners: 5,249 subscribers • Forest Health: 4,736 subscribers • Forest Planning: 4,574 subscribers • Local Input on State Forests: 4,956 subscribers • Prescribed Burn Notices: 5,315 subscribers • Statewide MDNR News: 22,643 subscribers • Upper Peninsula MDNR News: 13,826 subscribers • Urban and Community Forestry Programs: 3,942 subscribers • Wildfire Incident Updates: 7,027 subscribers <p>Thousands of routine inquiries, comments, complaints via email and telephone calls that are received and respond to by District Forest Managers and Unit Managers, but these interactions are not comprehensively documented.</p>
<p>4.4.b. The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	<p>C</p>	<p>MDNR also continues to conduct annual open houses and compartment reviews whereby social impacts--conveyed by participating stakeholders--and public input are considered in formulating treatment prescriptions.</p> <p>Citizen Advisory Councils are another long-established vehicle for providing public input. Public notice of compartment review and open houses for planning. Input is considered in development of final plans. Co-management with wildlife and collaboration between</p>

		divisions.
4.4.c. People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.	C	In 2011, MDNR developed unit-specific webpages for all divisions within the FMU so that interested public and adjacent landowners can access information and deliver comments to MDNR. The websites augment Open Houses and public service announcements in newspapers and on local radio stations. While more affirmative and focused (on adjacent or nearby landowners) would be more exemplary, the efforts undertaken by DNR are considered to be adequate for demonstrating conformity to this Indicator.
4.4.d. For public forests , consultation shall include the following components: <ol style="list-style-type: none"> 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.	C	The process for public participation is described within "Managing Michigan's State Forest: Your Guide to Participation." Public is notified of compartment reviews and open house meetings. Pre-inventory meetings are also open meetings, but are not currently listed at the website. Data used in decision making is available. Decisions can be appealed. FOIA process is used to respond to information requests. Tribal information is not subject to FOIA.
C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.	NE	
P5 Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	NE	
C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	NE	
C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	NE	
C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	NE	
C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	C	
5.5.a. In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or	C	MDNR maintains a sophisticated system of management policies, work instructions and practices aimed at assuring that the full range of forest services,

<p>enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.</p>		<p>resources and public values are considered prior to implementing site disturbing activities. See also response to OBS 2012.6.</p>
<p>5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.</p>	<p>C</p>	<p>See 5.5.a.</p> <p>While it is not possible that management of a very large public forest operation such as the forestlands administered by the MDNR can take place without some level of concern or discontent being voiced by one stakeholder group or another, it is the audit team’s ongoing conclusion that MDNR policies and practices are demonstrably responsive to stakeholder input.</p>
<p>C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	<p>C</p>	
<p>5.6.a. In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>	<p>C</p>	<p>63,243 acres of standing timber were sold for harvest in FY 2011-12 with an estimated volume of 842,900 cords. The most recent maximum sustained yield estimate for state forest timber production is based upon a calculation of approximate current state forest annual net growth, which is about 840,600 cords.</p> <p>There were no updates to the AAH in 2013. Final drafts of Regional State Forest Management Plans (RSFMPs) are being prepared which will provide an updated projection of harvest levels for the next decade.</p> <p>Emerald Ash Borer and Beech Bark Disease salvage harvests of infected stands have continued over the past 12 months, with corresponding updating of the inventory and RSFMPs and adjustment of the annual Plan or Work.</p>
<p>5.6.b. Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p>	<p>C</p>	<p>While there is not a calculated volumetric sustained yield harvest level (as the forest regulation approach is essentially a modified area control), available evidence based upon FIA data strongly indicates that actual harvest levels are below periodic increment and, as such, are non-depletory.</p>
<p>5.6.c. Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	<p>C</p>	<p>There are no NTFPs that are being commercially managed and made available for commercial harvesting.</p>
<p>5.6.d. For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by</p>	<p>C</p>	<p>No NTFPs are harvested in significant commercial operations other than a single mushroom collecting permit that was issued in 2012 after the Duck Lake burn. No other permits for such a scale of collecting</p>

<p>such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p>		<p>have been issued since.</p> <p>The Michigan Ginseng Act was passed in 1994 to regulate the harvest, sale, and distribution of American Ginseng in Michigan. This act covers both cultivated and wild ginseng, and makes it unlawful to take American ginseng from the wild without a permit from the MDNR.</p>
<p>P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</p>		
<p>C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</p>	<p>C</p>	
<p>6.1.a. Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:</p> <ol style="list-style-type: none"> 1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>; 2) <i>Rare, Threatened and Endangered (RTE) species</i> and <i>rare ecological communities</i> (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) <i>Soil resources</i>; and 6) <i>Historic conditions</i> on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions. 	<p>C</p>	<p>Assessments are guided by a Procedure Checklist, State Forest Land Resource Assessment Activities:</p> <ol style="list-style-type: none"> 1) MDNR inventory system (IFMAP) is based on forest community types and successional stages. Natural disturbance regimes are clearly reflected in management in the Grayling and Roscommon Units, where fire has been an important driver of landscape conditions throughout history. Considerations of natural disturbance patterns also are key elements of Management Area planning and RSFMPs. 2-5) RTE elements, habitats or other species of concern, water resources, and soils are all part of the IFMAP system and are mapped and discussed in pre-harvest meetings, which involve personnel from various disciplines. 6) A review of historical conditions is included in the SFMP, and more explicit information on historic conditions will be part of RSFMPs, when completed. At present, such conditions also appear to be an important consideration in existing silvicultural plans and a variety of other special plans.
<p>6.1.b. Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the <i>best available information</i>, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	<p>C</p>	<p>The assessments described in 6.1.a take place routinely as part of the pre-prescription review at the compartment level, a process that involves experts from a variety of disciplines in MDNR: forest management, wildlife habitat, T&E specialists, fisheries, soil and water, cultural and historical. A sophisticated spatial database provides abundant information that supports the inter-disciplinary reviews.</p>
<p>6.1.c. Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1)</p>	<p>C</p>	<p>The explicit objective of the compartment reviews is to avoid undue impacts on the environment and on the interests of affected stakeholders. Long-term</p>

<p>avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>		<p>ecological viability of the forest is being addressed in many ways, currently converging in Management Area planning and RSFMPs.</p>
<p>6.1.d. On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	<p>C</p>	<p>Many management-planning processes involve representatives from the public participating on planning teams. All plans are made available for public comment when they are in Final Draft form and again at the end of the approval process. Less formal assessments are presented at open houses, as part of the compartment review process, once per year in each management unit.</p>
<p>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>	<p>C</p>	<p>As has long been the case, there is a high level of organizational effort and resources devoted to appropriately managing the habitats of endangered species.</p>
<p>6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	<p>C</p>	<p>There have been no surveys for RTE species in FY13. The boundaries for some Ecological Reference Areas (ERAs) were updated, and an analysis for additional ERAs is in progress.</p> <p>The Natural Features Inventory and additional biodiversity information available in MDNR databases are used routinely by management foresters and referenced in the compartment inspection processes to identify the possible presence of RTE species and communities. Field inspections involve appropriate species experts, most of who are in MDNR's Wildlife Division or the MNFI, a separate office housed at Michigan State University.</p>
<p>6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	<p>C</p>	<p>Activities in 2013 include: timber sales, prescribed burns, mowing, and non-commercial and commercial site preparation and tree plantings. The extent of these activities is not routinely tracked, and would require a specific GIS analysis.</p> <p>Measures taken to protect any RTE species, habitats and/or plant communities is evaluated on a case by case basis during the Compartment inventory process using SCA, ERA, and HCVA layers in our GDSE and our Rare Species guidelines. Data bases for RTE species are routinely checked for ROW maintenance requests, use permits, event permits, burn plans, etc., and special management requirements are provided if hits occur.</p>
<p>6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.</p>	<p>C</p>	<p>MDNR's recovery efforts observed during the 2013 audit include large, landscape-level Jack pine (<i>Pinus banksiana</i>) zones managed for Kirtland's Warbler habitat. Large snags and declining trees are maintained for raptors and other species that depend on structure or woody debris during parts of their lifecycles.</p>
<p>6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	<p>C</p>	<p>In 2013, no activities that would have led to a take of an RTE species are known nor authorized.</p> <p>Such control of hunting, fishing, trapping, and similar</p>

		activities is yet another case where co-management of the State Forest between FMD and WFD is advantageous. Conservation officers are closely integrated with management personnel and enforce a wide range of laws and regulations, including wildlife laws.
C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	
6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented successional stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	NC	<p>State Senate Bill 78 has impacted the ability of the MDNR to continue with implementation of the Living Legacy project at the present time. In the interim, the MDNR is conducting an analysis to extend the ERA classification to include common natural communities on MDNR lands and some other ownership types.</p> <p>Some prescribed burns were conducted on the state forest in FY 2013 to enhance some plant species composition and abundance.</p> <p>Aspen harvests include retention of trees in groups and individuals consisting mainly of oak and conifer species or existing snags. Within aspen harvests, especially those maintained under shorter rotations, retention of older aspen age classes in larger clearcuts (e.g., >40 acres) is frequently relegated to the edges of timber sale boundaries for operational efficiency. While this retention is noted within the prescription for the timber sale and would be referenced in planning future harvests of the same stand, this retention currently is not tracked in MDNR's GIS layers. Aspen retained at timber sale boundaries for the purposes of maintaining a representative portion of a stand could be confused as being part of an adjacent stand or compartment that was not recently harvested. MDNR therefore risks losing this under-represented successional stage of aspen in the FMU. See Minor CAR 2013.1.</p>
6.3.a.2. When a rare ecological community is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, conservation zones and/or protected areas are established where warranted.	C	Work Instruction 1.4 provides guidance for land managers that conform to the intent of this indicator. Many rare ecological communities are wetlands or areas near wetlands that are rarely entered for harvests. If entered, areas within the unit are delineated for rare plant protection. Rare communities are normally detected during harvest planning and measures are devised to protect them or modify management practices to maintain or enhance them.
6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth . Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from	C	No harvests occur in old growth (OG) designations. Treatment of stands adjacent to OG stands are evaluated on a case by case basis during the compartment review process. Some Type 1 and Type Old Growth Special Conservation Areas (SCAs) were preliminarily verified in FY 13 field inventory.

<p>other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 		
<p>6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	C	<p>Most commercial harvest prescriptions benefit wildlife habitat (see the spreadsheet “MDNR_Habitat_Work_2012” for a summary). Many non-commercial treatments such as mowing, burning, and planting of mast species and under-represented conifer species are done for wildlife habitat purposes. There have been 14 prescribed fires on 1,464 acres on state forest lands for purposes of fuel reduction, site preparation, and habitat restoration in 2013 (as of September 19, 2013). The WLD Annual Report for FY 2012 provides additional detail on wildlife habitat work.</p>
<p>6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ol style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, 	C	<p>State BMPs are followed for all management activities near riparian area, but compliance with these BMPs is not specifically tracked. Buffer zones are established and treatments are either excluded or modified to protect water quality. When required, stream crossing permits and stream restoration projects are obtained from the MI DEQ.</p> <p>In 2013, the audit team observed a MDNR project to add woody debris to restore flow and habitat regimes for trout streams. Respect of RMZs, crossing upgrades,</p>

<p>e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</p>		<p>and fisheries habitat enhancement projects all contribute to conformance to elements a)-e) of the indicator.</p>
<p>Stand-scale Indicators 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	<p>C</p>	<p>Auditors observed oak-pine, northern hardwood, aspen, and conifer-hardwood swamp harvests in 2013. Levels of retention were consistent with maintaining larger individuals and seed sources on sites where even-aged harvests occurred.</p>
<p>6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>	<p>C</p>	<p>All seed used at the MDNR nursery originates from Michigan. Purchased red pine seedlings originate from Ontario. Wildlife Division under-plantings of oak and mesic conifers are sourced from Michigan or the Great Lakes region. Plantings of Beech Bark Disease resistant beech originate from cuttings in Michigan.</p>
<p>6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. Trees selected for retention are generally representative of the dominant species found on the site.</p>	<p>NC</p>	<p>Auditors observed oak-pine, northern hardwood, aspen, and conifer-hardwood swamp harvests in 2013. Snags and other woody debris were observed in all harvest units. Retained groups and individuals usually are conifers and oaks in aspen stands with smaller diameter aspens incidental to this retention. Non-aspen harvests include retention of dominant species throughout various diameter classes. Most areas include retention of trees representative of dominant species, with the exception of aspen harvests, where larger sized aspens are either not retained or are retained at harvest unit edges where they may be taken during the harvest of an adjacent compartment/stand. While MDNR included a discussion of options for retention based on species composition, dominance, opening size and other factors, incorporation of these retention guidelines into MDNR guidelines for all districts was not completed by the 2013 audit. MDNR risks failure to maintain or recruit habitat components and stand structures cited in indicator 6.3.f associated with dominant species in aspen harvests.</p> <p>See Minor CAR 2013.1.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>	<p>C</p>	<p>22,668 acres of even-aged harvests occurred in fiscal year 2011-12. There were no identified issues regarding within-stand retention.</p> <p>Other than those imposed in the second paragraph of Indicator 6.3.g.1, there are no limitations on even-aged management in the Lake States. Appendix C does not apply.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to</p>	<p>NA</p>	<p>Other than those imposed in the second paragraph of Indicator 6.3.g.1, there are no limitations on even-aged</p>

<p>allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 		<p>management in the Lake States. Appendix C does not apply.</p>
<p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	<p>C</p>	<ul style="list-style-type: none"> • A total of 7,512 acres were prepared for Ash and Beech salvage harvests in FY13, using state forest inventory data and information from a MDNR contract with Michigan Technological University (MTU) prioritize stands for harvest to minimize economic losses from EAB. • PRD staff conducted limited intensity surveys for gypsy moth egg masses in State Forest Campgrounds • Oak Wilt Suppression Project for Menominee and Iron Counties (MDNR and MTU cooperative project funded by a US Forest Service, State and Private Forestry Suppression Grant.). A MDNR plane and digital camera were used to take aerial photography of oak areas in 10 compartments in Menominee and Iron Counties in the Western Upper Peninsula. This high resolution photography was used to locate areas of oak mortality. MTU visited all areas of oak mortality to determine if oak wilt was present. Oak wilt was confirmed if pressure pads were found or if branch samples cultured at MTU by Dr. Dana Richter were positive for oak wilt. Twenty seven oak wilt sites were confirmed totaling 84 acres. A total of 32,000 feet of root graph barriers are currently being established using a vibratory plow equipped with a 5-foot blade. Once the oak wilt epicenters have been isolated, all red oak within the epicenters will be removed via timber sales. Potential spore producing trees (e.g. those that died of oak wilt this year which produce oak wilt pressure mats next year) will be chipped or otherwise processed before April 15, 2014 to remove inoculum that is used by sap beetles to vector oak wilt to wounds. All proposed treatments were reviewed by the USDA Fish and Wildlife Service, the State Historical Preservation

		<p>office and Native American Tribes with an interest in the treated areas.</p> <ul style="list-style-type: none"> • Three workshops were held in conjunction with Michigan State University, Michigan Department of Agriculture and Rural Development using 2012 Farm Bill funding to train representatives from groups who work with trees in the state on invasive insect and disease species. Sessions were held in Novi (50 attending), Roscommon (47 attending), and Escanaba (54 attending) with audiences made up of a wide array of people who work with trees from arborists, foresters, and tree service employees, to forest land owners. • WLD conducted monitoring of spotted knapweed bio-control on Bullock Ranch, Camp Grayling and Houghton Lake Flats. • WLD conducted <i>Phragmites</i> treatments in Mackinaw, Chippewa, Delta and Menominee Counties on state and private lands. Approximately 450 treated by Cooperative Weed Management Areas and Wildlife Division. Nearly half of the sites are on state land. • WLD conducted a 500 acre survey for European frogbit and did rapid response hand removal in Munuscong Bay. • 37,000 pounds of garlic mustard were removed in the Upper Peninsula on public and private land led by Cooperative Weed Management Areas. Half came from state forest land. • Phragmites, Japanese knotweed, garlic mustard and oriental bittersweet treatments were conducted in Manistee, Benzie, Leelanau, Grand Traverse and Kalkaska County state forest land led by Cooperative Weed Management Areas • WLD conducted a 1,000 acres survey for European frogbit and did rapid response hand removal in Alpena to Fletcher’s Pond. • Phragmites treatments were conducted on Beaver Island Archipelago – public and private lands – led by Beaver Island Homeowner’s Association and Wildlife Division. • WLD mapped autumn olive in openings/edges on state land in Lake County. • WLD surveyed 35 hibernacula on a variety of ownerships statewide for detection of <i>Geomyces destructans</i> (fungus that causes White Nose Syndrome or WNS). Coordinated active surveillance efforts with additional research and other bat related field work being done by other state and federal agencies, universities, and private contractors (i.e. wind energy) with no suspect observations reported. Maintain a passive statewide public reporting system for any anomalous bat behavior associate with WNS infection, with no received reports. • WLD conducted Mute Swan control on coastal areas and inland lakes and rivers on state and
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		<p>private lands.</p> <ul style="list-style-type: none"> MDNR maintains the Midwest Invasive Species Information Network, the database of invasive species for Michigan and the Midwest. This year launched the early alert system and beta versions an android app.
6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	Statewide, there have been 14 prescribed fires on 1,464 acres on state forest lands for purposes of fuel reduction, site preparation, and habitat restoration in 2013 (as of September 19, 2013). For the same period, there have been a statewide total of 248 wildfires that have burned 732 acres.
C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.	NC	
<p>6.4.a. The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the <i>landscape</i> (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) <i>GAP analyses</i>; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p> <p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p>	NC	<p>At the opening meeting of the 2013 annual audit, the SCS audit team was informed that no response to or actions resulting from the April 9th submittal had as yet been issued by the Resource Bureau Management Team. The audit team construes this to mean, at least on a de facto basis, that MDNR has elected Option 1, to do nothing.</p> <p>After many years of addressing the underlying issues through numerous certification findings, the lack of any action since April 9, 2013 and the ongoing failure to complete a pathway for demonstrating compliance with FSC Indicator 6.3.a.2 and Indicators 6.4.a-e, the audit team is left with no choice but find that MDNR is in Major Non-Compliance with those elements of the FSC certification standard.</p> <p>See Major CAR 2013.2.</p>
<p>6.4.b. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p> <p>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p>	NC	<p>Based on the results of the assessment conducted in 6.4.a, MDNR has not formally designated a fully representative and current network of RSAs.</p> <p>See Major CAR 2013.2.</p>
<p>6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p> <ul style="list-style-type: none"> a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated. 	NC	<p>While the reasons for not completing the RSA classification process involve several factors, a key point of misunderstanding among economic stakeholders has been that RSAs automatically and always imply passive management. The 2008 Michigan State Forest Management Plan (pages 183-184) and Forest Certification Work Instruction 1.4 define allowable management activities that are compatible with or necessary to maintain RSAs; however, how RSAs are managed is integral to the larger discussion about re-defining and updating the network of RSAs. Given this, the work instruction may or may not need to be modified once MDNR completes its RSA</p>

		assessment. See Major CAR 2013.2.
6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.	NC	MDNR has not included a step in its RSA assessment procedures to determine if the need for RSAs has changed, to be conducted at a minimum of every 10 years (6.4.d). See Major CAR 2013.2.
6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	NC	MDNR's RSA assessment does not include measures to determine if its network of RSAs has a level of contiguity sufficient to maintain species dependent on interior core habitats (6.4.e). See Major CAR 2013.2.
C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	C	
6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	NE	
6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	NC	Forest operations did not meet or exceed Best Management Practices (BMPs) that address riparian management zones (RMZs) for vernal pools in the Russell Lake Aspen harvest. Trees were felled into the vernal pool and the boundary of the RMZ was not adequately respected, as required in the State MDNR/MDEQ Sustainable Soil and Water Quality Practices on Forest Land manual (p. 29). See Minor CAR 2013.3
6.5.c. Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: <ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate. 	NE	

<p>6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 	<p>NE</p>	
<p>6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written Streamside Management Zone (SMZ) buffer management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>	<p>NC</p>	<p>Forest operations did not meet or exceed Best Management Practices (BMPs) that address riparian management zones (RMZs) for vernal pools in the Russell Lake Aspen harvest. Trees were felled into the vernal pool and the boundary of the RMZ was not adequately respected, as required in the State MDNR/MDEQ Sustainable Soil and Water Quality Practices on Forest Land manual (p. 29).</p> <p>See Minor CAR 2013.3</p>
<p>6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>	<p>C</p>	<p>There are variations from minimums stated within MDNR/MDEQ Sustainable Soil and Water Quality Practices on Forest Land requirements.</p>
<p>6.5.f. Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and</p>	<p>NE</p>	

<p>constructed to minimize impacts on water quality, hydrology, and fragmentation of aquatic habitat. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>		
<p>6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	NE	
<p>6.5.h. Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	NE	
<p>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	C	
<p>6.6.a. No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	C	<p>While MDNR uses chemicals on the list of FSC-banned chemicals, it operates within the limitations imposed by the FSC derogations secured for the use (expires Jan 2015).</p>
<p>6.6.b. All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>	C	<p>MDNR only employs chemicals when one of the conditions described in elements a)-d) has been met. For example, forest health staff helps ensure that insect pests are detected and treated early and only when and where necessary. Silviculture specialists review FTP requests and prepare detailed plans for herbicide use, and supervise their implementation.</p>
<p>6.6.c. Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.</p>	C	<p>MDNR uses alternatives to chemical pesticides when they are legal, reasonably cost effective, and available and meet management objectives. When chemical pesticides are used, select the least- toxic, narrowest spectrum products labeled for the target species.</p>
<p>6.6.d. Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will</p>	C	<p>A written prescription is required, the PAP. "The PAP must include personal and environmental safety precautions, potential environmental effects, and the</p>

employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.		location of any environmentally sensitive areas, including threatened or endangered species and species of special concern.” (Work Instruction 2,,2)
6.6.e. If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.	C	The Timber Management Specialist maintains records of control measures and infestations. Wildlife Action Plans also include measures for monitoring chemical use for adaptive management. MDNR includes a summary of chemical use research on invasive species in its Sustainable Forestry Research summaries, which are produced annually. Exposure is tracked per Michigan law.
C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C	
6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	NE	
6.7.b. In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	NC	A spill of fuel or oil occurred on the Russell Lake harvest and there was a failure to contain the material and complete disposal and remediation procedures as required by the terms of the MDNR timber sale contract and applicable law. See Minor CAR 2013.4.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	NE	
C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	NE	
C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	There are no exotic species used for management or commercial purposes on the FMU.
6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	See. 6.9.a.
6.9.c. The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	See. 6.9.a. See C6.3 for control measures of exotic invasive species.
C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest	C	

<p>management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p>		
<p>6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>Such conversions occur rarely on the state lands managed by the DNR. Small areas may be cleared for recreational trails, campgrounds, or mineral extraction (see 6.10.f), but the cumulative effect to the forested land base is negligible.</p> <p>Conversion of areas for oil, gas, and mineral (OGM) development occurs on a very limited portion of the FMU. Since most pads are 1-5 acres in size and are active for 1-30 years, several pad areas are restored to native forest cover. The rate of area converted for OGM development has slowed on state lands. Given the restoration component, it is unlikely that conversion surpasses 0.2% of the FMU in a given year.</p>
<p>6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>For OGM leases, MDNR screens potential lease areas as determined by private extraction companies to see if the location will in any way hinder to enhance MDNR objectives. Once a general area is agreed upon, such companies must complete an environmental impact assessment that includes a screening process for HCV, archaeological features, and other special sites (See Well Site Surface Use Permit, 72-402-2013, Merrit Energy Company).</p>
<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>MDNR receives payment from OGM lessors that is placed into the Land Trust Fund. This fund is dedicated to purchasing land for consolidation objectives, which increases the contiguity of the FMU and reduces the impacts of MDNR management to adjacent lands and inholdings. The converted OGM areas themselves may be used as wildlife openings during restoration.</p>
<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	C	<p>There is no conversion to plantations. OGM areas are not restored to plantations.</p>
<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)</p>	C	<p>The Red Pine Management Plan incorporates clear justification for those situations where hardwood sites are converted to red pine stands (the most common instance of such conversion). Guidelines for planting red pine in more natural configurations address the intent of C.6.3. It should be noted that red pine was a widespread forest type in Michigan, historically.</p>
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	C	<p>There are some instances of gas wells on the State Forest and the potential for additional mineral drilling. Areas converted from forest for such purposes are clearly mapped and the CB is notified. Removal of these areas from the scope is not warranted as they are a small portion of the FMU and old well pads are regularly shut down and the sites restored to native vegetative cover.</p> <p>MDNR exercises control on the location of well pads and in most cases owns the OGM rights, which are typically leased to third parties. See 6.10.a-d.</p>

<p>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>C7.1. The management plan and supporting documents shall provide: a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species. h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.</p>	<p>NE</p>	
<p>7.1.a. The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>		
<p>7.1.b. The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</p>		
<p>7.1.c. The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.</p>		
<p>7.1.d. The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.</p>		
<p>7.1.e. The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</p> <ul style="list-style-type: none"> • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9); • Other special management areas. 		
<p>7.1.f. If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).</p>		
<p>7.1.g. The management plan describes insects and</p>		

diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).		
7.1.h. If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.		
7.1.i. If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.		
7.1.j. The management plan incorporates the results of the evaluation of social impacts, including: <ul style="list-style-type: none"> • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g). 		
7.1.k. The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).		
7.1.l. The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.		
7.1.m. The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.		
7.1.n. The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.		
7.1.o. The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.		
7.1.p. The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.		
7.1.q. Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.		
7.1.r. The management plan describes the stakeholder		

consultation process.		
C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	NE	
C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	NE	
C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a. While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	MDNR’s forestry portal, http://www.michigan.gov/MDNR/0,4570,7-153-30301-00.html , includes all management planning documents. There are now three headings (Programs, Forest Certification, and Water Management) that lead to various subjects that cover the elements of Criterion 7.1. The document, <i>Comprehensive Summary of MDNR Planning Process</i> , is readily available on the MDNR web site. Coupled with the fact that the entirety of all MDNR plans related to the management of the State Forests is publicly available, this Indicator is being met. Note: Website has not been updated with new certification coordinator information.
7.4.b. Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.	C	See “ A Comprehensive Summary of the Department of Natural Resources Planning Process For Natural Resource Management in Michigan ” available on the MDNR web site.
P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.		
<i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i>		
C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	NE	
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	Regeneration surveys, compartment review field evaluations, FIA plot surveys, and forest health surveys make up the inventory system and cover elements a)-f) of the indicator. Forest health surveys/reports are as discussed for Criterion 6.3 (7).

<p>8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	<p>C</p>	<p>Resource Damage Reports (RDR) are logged and tracked in the RDR database.</p> <p>Actual harvest levels, including any abnormal level of harvesting activity in response to, for instance, mortality, are tracked and well known to Departmental planners and managers</p> <p>MMIDNR expends considerable effort to monitoring pest and pathogen activity both at a large/strategic scale but also within the YOE/compartiment review process.</p>
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	<p>63,243 acres of standing timber were sold for harvest in FY 2011-12 with an estimated volume of 842,900 cords. Records for the past 10 years are available to ensure that the AAH does not exceed the average AAH over a rolling 10 year period.</p>
<p>8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their habitats; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4). 	<p>C</p>	<p>Natural community surveys were conducted by Michigan Natural Features Inventory in FY 2013. An annual report of these surveys is not yet completed or available.</p> <p>MDNR foresters and biologists conduct an on-site assessment of each stand proposed for treatment in a year of entry (YOE) compartment. Determining the presence of RTE species and high quality natural plant communities is part of that assessment. The Michigan Natural Features Inventory (MNFI) maintains a database of the observations and locations of RTE species and plant communities. As part of the compartment review process, foresters and biologists consult this database to check for records of RTE species or high quality natural community occurrences, and to assess the potential impacts of proposed forest treatments. To assist with the compartment review process, MNFI was contracted in FY 2013 to conduct this review and prepare reports evaluating potential impacts of timber management for the 3,810 acre Crisp Point acquisition.</p> <p>The MDNR Wildlife Division monitors some wildlife populations by conducting or cooperating with wildlife surveys. The division annually surveys for: bald eagles, osprey, woodcock, waterfowl, Kirtland's warbler, sharp-tailed grouse, and frogs & toads. A biennial survey was conducted in 2013 for wolves and moose. Biennial surveys were last conducted in 2012 for black bear and elk. An annual bear bait survey is geographically restricted to Drummond Island. The Division uses annual registration of harvested animals to monitor for population changes in deer, elk, bear, otter, fisher, and marten. The Division also cooperates in the banding of woodcock, ducks, and geese, which provides another means of monitoring survival rates and population trends. Although these surveys generally have statewide or regional scopes, they all include significant amounts of state forest land.</p>
<p>8.2.d.1. Monitoring is conducted to ensure that site</p>	<p>C</p>	<p>MDNR's prescriptions are reviewed in the field at least</p>

specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.		biweekly during operations. Regeneration surveys are conducted as a part of monitoring natural and assisted regeneration 5-10 years post-harvest as scheduled in compartment calendars. Evidence: interviews with state foresters and examination of harvest prescriptions.
8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	Road monitoring includes several activities, including during and after harvesting to ensure that drainage features are in place and intact. Other road monitoring occurs as part of Conservation Officers' and state park staff's patrols for ORV/ATV use.
8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	No new formal social impact studies or monitoring activities were conducted in FY 2013. Nonetheless, the audit team concludes that MDNR, through other mechanisms, is maintaining current awareness of the socio-economic consequences of its management activities.
8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.	C	MDNR staff at local offices discussed day-to-day contacts with local elected officials, user-groups, and other interested parties during the 2013 audit. Actions in the field taken in response to stakeholder comments include protection of slopes from excessive ORV use or rerouting of ORV trails to accommodate multiple uses.
8.2.d.5. Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	MDNR implemented actions to invite the opportunity to jointly monitor sites of cultural significance to local tribes in its response to Minor CAR 2010.3 in 2011. SCS did not conduct more stakeholder consultation in 2013 to monitor continued conformance to this indicator.
8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	The Forest Resources Division published an Accomplishments Report for FY 2012.
C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	NE	
C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.	C	
8.4.a. The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	C	MDNR's draft regional state forest management plans were released for public comment in October 2013; these plans, once finalized, will aid in assessing conformance to this Indicator at the whole-FMU level possible in future audits. In the absence of these plans, MDNR has been monitoring objectives at level of individual state forests and compartments.
8.4.b. Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.	C	The finalization of the regional state forest management plans will allow MDNR to better monitor how it is meeting its objectives over time. Current issues that have led to changes in management strategy include invasive pathogens that have driven an accelerated sanitation-salvage harvest strategy to reduce the spread of pathogens or mitigate their negative impacts.
C8.5. While respecting the confidentiality of information,	NE	

<p>forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</p>		
<p>P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ul style="list-style-type: none"> a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). 		
<p>C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>C</p>	
<p>9.1.a. The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	<p>C</p>	<p>DNR’s Work Instruction 1.4 provides the following guidance for identification of HCVFs: High Conservation Value Areas (HCVAs) (including ERAs on state land) are areas that have been recognized for their contribution to specific conservation values, objectives and ecological attributes or significant social values. Examples of a recognized DNRE process include legislation, administrative rules, Director’s and Natural Resource Commission Orders. Examples of existing HCVAs include Dedicated Natural, Wilderness or Wild Areas, Natural Rivers, species recovery plans such as Kirtland’s Warbler Management Areas, and critical dune areas. Typically, HCVAs are a subset of SCAs on State Forest land that have had significant public participation and/or public review as part of their planning process. New HCVA areas will be designated using the approved Biodiversity Conservation Planning Process (BCPP). The scale of this process is significant, 3.9 million acres of State Forest. As such, numerous teams are working on this process, with a substantial number of stakeholders and consideration of adjacent lands. Auditors viewed proposed maps of BSAs and viewed examples of several BSAs that occurred entirely on State Forest land. Because many of these areas have been identified and have interim protection as SCAs, auditors find conformance with this indicator while recognizing that full conformance and an objective listing of HCVFs awaits completion of the BCPP and RSFMPs. See OBS 2013.5.</p>
<p>9.1.b. In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.</p>	<p>C</p>	<p>Numerous stakeholders and specialists participated on Core Design Teams.</p>

<p>9.1.c. A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.</p>	<p>C</p>	<p>There have been no changes to MDNR’s current portfolio of HCVAs. The results of the assessment for HCVAs and associated management strategies can be found in the Executive Summary and Chapter 5 of the 2008 Michigan State Forest Management Plan. The link to the plan is: http://www.michigan.gov/dnr/0,4570,7-153-30301_33360-144977--,00.html.</p> <p>Spatial data for all HCVAs is provided in the IFMAP Geographic Decision Support Environment, and have been incorporated into each Management Area in each Regional State Forest Management Plan (RSFMP).</p> <p>Because there are no changes to the current portfolio of HCVAs, the final RSFMP public review process will not directly provide any additional HCVA public consultation. Additional stakeholder consultations regarding HCVAs will have to be re-evaluated as part of a revised strategy for fully addressing Criterion 6.4 and Indicator 6.3.a.2 -specifically for HCV 3 rare ecosystems. Elements of the approved Living Legacy Staff and Public Review Action Plan will certainly remain relevant and useful for future HCVA public consultation.</p>
<p>C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	<p>C</p>	
<p>9.2.a. The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.</p>	<p>C</p>	<p>Stakeholder consultations are a key part of the BCPP. See “Biodiversity Stewardship Area Staff and Public Review Action Plan.” See also 9.1.c.</p>
<p>9.2.b. On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.</p>	<p>C</p>	<p>See “Biodiversity Stewardship Area Staff and Public Review Action Plan.” See also 9.1.c.</p>
<p>C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	<p>NE</p>	
<p>9.3.a. The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>		
<p>9.3.b. All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.</p>		
<p>9.3.c. If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation</p>		

efforts with adjacent landowners.		
C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a. The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	Natural community surveys were conducted by Michigan Natural Features Inventory in FY 2013 for the Crisp Point acquisition in the Newberry FMU, the Mason Tract in the Grayling FMU, and the Little Munuscong area in the Sault Ste. Marie FMU. An annual report of these surveys has been received by the MDNR, which described the addition of 13 element occurrence records to the Natural Heritage database. Ten percent of HCVAs are also examined by MDNR field staff each year as part of the compartment review process.
9.4.b. When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	No significant threats were reported in 2013.

Appendix 6 – Chain of Custody Indicators for FMEs

Chain of Custody indicators were not evaluated during this annual audit.