



**FSC Certification Report for the
2009 Annual Audit of:
Michigan Department of Natural Resources
Certificate Number: SCS-FM/COC-090N**

**Under the
SCS Forest Conservation Program
(An FSC-Accredited Certification Program)**

**Date of Field Audit: October 26-29, 2009
Date of Draft Report:
Date of Final Report: March 25, 2010**

**Scientific Certification Systems
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Section 2.0 (Surveillance Decision and Public Record) will be made publicly available on the SCS website (www.scscertified.com) no later than 60 days after the report is finalized.

1.0 GENERAL INFORMATION

1.1 CONTACT INFORMATION

Michigan Department of Natural Resources and Environment
1990 US-41
South Marquette, MI 49855
Contact: Dennis Nezich, Forest Certification Specialist
Email: nezichd@michigan.gov

1.2 General Background

This report covers the fourth annual audit of Michigan Department of Natural Resources' management of the Michigan State Forests pursuant to the FSC guidelines for annual audits as well as the terms of the forest management certificate awarded by Scientific Certification Systems in December, 2005 (SCS-FM/COC-090N). All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing compliance with the requirements and standards of certification. A public summary of the initial evaluation is available on the SCS website www.scscertified.com.

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
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior audit
- 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.

At the time of the fourth annual audit, there were four open Corrective Action Requests, the status of MI DNR's response to which was a major focus of the annual audit (see discussion, below for a listing of those CARs and their disposition as a result of this annual audit).

1.3 Guidelines/Standards Employed

For this annual audit, the SCS audit team evaluated Michigan DNR's conformance with selected components of the FSC Lake States-Central Hardwoods Region Standards v3.0. Per FSC auditing protocols, it is not expected that annual surveillance audits cover the full scope and content of the applicable certification standard. Rather, it is expected that over the course of four

successive annual surveillance audits that the full scope of the certification standard is addressed. The Lake States-Central Hardwoods Regional Standard was endorsed in February 2005.

The client is advised that FSC-US expects to have a new US National Standard duly accredited by the Board of Directors of the Forest Stewardship Council by the middle of 2010. If this expected date for accreditation of the new Standard is met, then Michigan DNR's 5-year re-certification evaluation, likely to take place in the second half of 2010, will be conducted against that new standard.

2.0 SURVEILLANCE DECISION AND PUBLIC RECORD

2.1 Assessment and Surveillance Activity Dates

The SCS audit team (Robert J. Hrubes, Mike Ferrucci) conducted the field component of the 2009 annual surveillance audit of the Michigan Department of Natural Resources' (DNR) management of the state forest system on October 26 – October 29, 2009.

Prior to the 2009 annual surveillance audit the following audit activities were undertaken:

- Mid-year (June and July) email and telephone correspondence with the DNR Forest Certification Specialist, focusing on review of materials submitted to SCS in response to CARs issued in 2008 with mid-2009 due dates.
- Interactions with DNR personnel focusing on scheduling and planning the 2009 annual surveillance audit
- Outreach to a cross-section of stakeholders, prior to the 2009 audit, soliciting comments and perspectives on the DNR's management of the state forest system.

2.2 Assessment Personnel

For the 2009 annual audit, the audit team was comprised of Dr. Robert J. Hrubes (lead auditor) and Mr. Michael Ferrucci. Both Dr. Hrubes and Mr. Ferrucci were team members for the 2005 full evaluation and the 2006-2008 surveillance audits. Thus, there was full auditor continuity between this audit and previous ones.

Dr. Robert J. Hrubes, Team Leader: Dr. Hrubes is Senior Vice-President of Scientific Certification Systems. He is a registered professional forester and forest economist with 27 years of professional experience in both public and private forest management issues. He served as team leader for the initial MI DNR Forest certification evaluation. Dr. Hrubes worked in collaboration with SCS to develop the programmatic protocol that guide all SCS Forest Conservation Program evaluations. Dr. Hrubes has led numerous SCS Forest Conservation Program evaluations of North American (U.S. and Canada) industrial forest ownerships, as well as operations in Scandinavia, Chile, and Japan. He also has professional work experience in

Brazil, Germany, Guam (U.S.), Hawaii (U.S.), and Malaysia. Dr. Hrubes is the author of this audit report.

Mr. Michael Ferrucci, Team Member (Forest Management and Silviculture):

Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 20+ years. Its clients include private citizens, land trusts, municipalities, corporations, private water companies, and non-profit organizations. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies.

2.3 Assessment Process

The scope of the 2009 annual surveillance audit, as with all annual audits, included: document review, auditors spending time in the field and office, interviewing management personnel and, as appropriate, interacting with outside stakeholders. It should be noted that FSC protocols do not require extensive stakeholder consultation as part of annual surveillance audits. For this audit, as with past audits, the SCS lead auditor made phone-based contact with a cross-section of stakeholders for the purpose of soliciting input/perspective/concerns/commendations on DNR's management of the state forest system. As with prior stakeholder outreach, the lead auditor sought specific input on stakeholder attitudes on the DNR's timeframes for completing regional state forest management plans and eco-regional plans which continue to be lengthened due to budgetary constraints as well as emerging efforts at better coordinating the various levels of planning on the state forests.

Planned Audit Itinerary¹:

PRC / Roscommon Tuesday Oct. 27 8 am to 4 pm

<i>Time</i>	<i>Activity</i>
7:50 am	Arrive at Forest Management Unit (FMU) Office
8:00 am	Opening Meeting and Office Discussions; FSC CARs and SFI CARs
10:00 am	Overview of PRC / Roscommon Forest Management Units; Office Discussions; and Finalize Field Visits
11:00 am - 3:30/4 pm	Field Site Visits (Roscommon end 3:30/ PRC end 4 pm)

Roscommon Selections: C 193 (active sale, other sales, trails, other); C 190 (Stony Ridge Oak, other); C 14 (2 active or recently completed sales); C 12 (airport if time allows)

PRC Selections: C 43: High Country Oak, Town Corner Jack Pine; C 42:

Evening: Auditors and selected DNR staff travel to Marquette

Baraga FMU Tuesday Oct. 28 8 am to 5 pm

8:20 am	Arrive at Baraga FMU Office
8:30 am	Overview of Baraga FMU and District Operations, Office Discussions, Finalize Field Visit
10:00 am - 4 pm	Field Site Visits (2 separate tours)

North Tour: C 3 (2 completed and 1 marked not cut hardwood selection); possible visit to adjacent C61 Sturgeon Sloughs WMA); 45-minute drive on county and state forest roads to C51/53 to view active harvesting, Campground harvest area, boating access site with RDR work, and other sales as time allows); Snowmobile / ORV trail with RDR issues

South Tour: C 5, 9, 12 (various timber management; recreation use including dedicated ORV trails; burn area being reforested through scarification and /or planting)

Evening: Auditors and selected DNR staff return to Marquette

Gwinn Thursday Oct. 29 8 to 2:30 pm

7:50 am	Arrive at Gwinn Operations Service Center
8:00 am	Overview of Gwinn FMU, other District specialists, Office Discussions, Finalize Field Visit
9:30 am – 2:30 pm	Field Site Visits (2 separate tours)
2:30 pm – 3 pm	Travel to Marquette OSC

West Tour: C 278 (active sale and other sales), C 260 (recently closed), C 248 (if time allows, Jack Pine), other: FTP involving chemical use

¹ The audit team's deliberations and the exit meeting were not held at the Marquette OSC, as originally planned. Instead, the deliberations and exit meeting were held at the Gwinn OSC, to facilitate the lead auditor making his flight out of the Green Bay airport.

South Tour: C 51 (chipping, controlled burn), HCVF/ERA in C55, C53 (recently closed)

<u>Marquette OSC</u>	<u>Thursday Oct. 29</u>	<u>3 to 5 pm</u>
3 pm – 4 pm	Auditor deliberations	
4 pm – 5 pm	Final FSC and SFI Exit Briefings	

2009 Annual Audit Participants:

Opening Meeting by Conference Call

Date: October 27, 2009

Name	Organization	Title/position
Mike Ferrucci	NSF-ISR	SFI Lead Auditor, FSC Auditor
Robert Hrubes	SCS	FSC Lead Auditor, SFI Auditor
Lynne Boyd	DNR – FMFM	Chief, FMFM
Cara Boucher	DNR – FMFM	Assistant Chief, FMFM; State Forester
Bill Sterrett	DNR – FMFM	Section Manager, Forest Resource Mgmt.
Dave Neumann	DNR – FMFM	State Silviculturist
Dennis Nezich	DNR - FMFM	Forest Certification Specialist
Penney Melchoir	DNR – Wildlife	Field Operations Supervisor
Larry Pedersen	DNR - FMFM	Planning and Operations Unit Leader, Lansing
Mike Paluda	DNR – FMFM	Field Coordinator, UP
Jim Radabaugh	DNR – FMFM	State Trails Coordinator
William O’Neill	DNR – FMFM	LP Field Coordinator
Dayle Garlock	DNR – FMFM	District Forest Manager, ELP
David Price	DNR – FMFM	Certification Planner
Lt Creig Grey	DNR - LED	District Supervisor LED
Steve DeBrabander	DNR – FMFM	Head of State Trails Construction Unit
Amy Clark-Eagle	DNR – FMFM	Biodiversity Program Manager
Steve Scott	DNR – Fisheries	Basin Coordinator East UP
George Madison	DNR - Fisheries	District Supervisor

Pigeon River Country**Date: October 27, 2009**

Pigeon River Country FMU		
Robert Hrubes	SCS	FSC Lead Auditor, SFI Auditor
Scott Whitcomb	DNR-FMFM	Unit Manager
Matt Storey	DNR-FMFM	Intern
John Pilon	DNR-FMFM	Planning and Inventory Specialist
Nick Torsky	DNR-LED	Conservation Officer
Dennis Nezich	DNR-FMFM	Forest Certification Specialist
Mark Monroe	DNR-WLD	Wildlife Technician
Brian Bury	DNR-FISH	Natural Rivers Program Coordinator
Robin Pearson	DNR-FMFM	ELP Recreation Specialist
Jim Bielecki	DNR-FMFM	Silviculturist
Penney Melchoir	DNR-WLD	Field Operations Supervisor
Brian Mastenbrook	DNR-WLD	Wildlife Habitat Biologist
Keith Kintigh	DNR-WLD	Wildlife Ecologist
Tim Cwalinski	DNR-FISH	Fisheries Management Biologist
Dan Hopkins	DNR-LAW	District Law Enforcement Supervisor
Dayle Garlock	DNR-FMFM	District Forest Manager
Don Mittlestat	DNR-FMFM	Forester, Pigeon River Management Unit
Rick McDonald	DNR-FMFM	Forester, Pigeon River Management Unit

Location: Roscommon, MI

Date: October 27, 2009

Name	Organization	Title/position
Mike Ferrucci	NSF-ISR	SFI Lead Auditor, FSC Auditor
Larry Pedersen	DNR – FMFM	Planning and Operations Unit Leader, Lansing
Bill Sterrett	DNR – FMFM	Section Manager, Forest Resource Mgmt.
William O’Neill	DNR – FMFM	LP Field Coordinator
Paige Perry	DNR – FMFM	Trails Program Analyst, ELP
Todd Neiss	DNR – FMFM	FMFM Rec, Pathway/Recreation Specialist
Tom Haxby	DNR – FMFM	FMFM Planner
Scott Throop	DNR – FMFM	Timber Management Specialist
Sgt. Glenn Gutierrez	DNR - LED	Conservation Officer Ogemaw County
Tim Reis	DNR – Wildlife	Supervisor, NE Management Unit
Lt Creig Grey		District LED
Mark Boersen	DNR – Wildlife	WLD Biologist
Kathrin Schrouder	DNR – Fisheries	FSH Biologist, Ogemaw County
Steve Anderson	DNR – FMFM	Unit Manager
Jason Hartman Jason Lewicki Ben Wiese Dale Ekdorn	DNR – FMFM	Foresters
Tim Croxen	DNR – FMFM	Fire Officer West Branch
Kris Polus	DNR – FMFM	Secretary (office)
Amy DeRuiter	DNR – FMFM	Acting Unit Fire and Recreation Supervisor
Kirk Bradley	DNR – FMFM	Unit Leader, Forest Fire Exp. Station
Randy Hartman	DNR – FMFM	Forest Fire Officer

Location: Baraga, MI

Date: October 28, 2008

Name	Organization	Title/position
Mike Ferrucci	NSF-ISR	SFI Lead Auditor, FSC Auditor
Robert Hrubes	SCS	FSC Lead Auditor, SFI Auditor
Mike Paluda	DNR – FMFM	Field Coordinator, UP
Penney Melchoir	DNR – Wildlife	Field Operations Supervisor
Dennis Nezich	DNR – FMFM	Forest Certification Specialist
Larry Pedersen	DNR – FMFM	Planning and Operations Unit Leader, Lansing
Deb Begalle	DNR – FMFM	Dist. Supervisor FMFM
Bob Doepker	DNR – Wildlife	WUP Unit Dist. Supervisor WLD
George Madison	DNR – Fisheries	Dist. Supervisor FSH
Patrick VanDale	DNR – Fisheries	Technician Supervisor
Tom Proul	DNR – FMFM	Baraga
Lt. Tim Robson	DNR – LED	District Supervisor LED
Jim Ferris	DNR – FMFM	FMFM Timber Management Specialist
John Hamel	DNR – FMFM	Inventory and Planning Specialist
Ron Yesney	DNR – FMFM	FMFM Recreation Specialist
Brad Johnson	DNR – Wildlife	WLD Technician
Mark McKay	DNR – Wildlife	Southern Ecologist (formerly worked on forest planning in the WUP) still ¼ on planning here
Kevin Swanson	DNR - Wildlife	Habitat Biologist assigned to Shingleton, EUP but ¼ time in W UP
Jason Mittlestat	DNR – FMFM	Foresters
Don Mankee	DNR – FMFM	Unit Manager
Brad Carlson	DNR – FMFM	Forester
Fred Hansen	DNR – FMFM	Forest Tech
John Turunen	DNR – FMFM	Forest Tech
Greg Tarnowki	DNR – FMFM	FMU Fire Supervisor, Acting
Tom Proulx John Mattila Greg Tarnowski	DNR – FMFM	Fire Officers
Gail Voldarski, Val Miller	DNR – FMFM	Secretary (office)

Location: Gwinn FMU, MI

Date: October 29, 2008

Name	Organization	Title/position
Mike Ferrucci	NSF-ISR	SFI Lead Auditor, FSC Auditor
Robert Hrubes	SCS	FSC Lead Auditor, SFI Auditor
Mike Paluda	DNR – FMFM	Field Coordinator, UP
Dennis Nezich	DNR - FMFM	Forest Certification Specialist
Penney Melchoir	DNR – Wildlife	Field Operations Supervisor
Larry Pedersen	DNR - FMFM	Planning and Operations Unit Leader, Lansing
John Pilon	DNR – FMFM	Forest Planner
Deb Begalle	DNR – FMFM	Dist. Supervisor FMFM
Bob Doepker	DNR – Wildlife	W UP Dist. Supervisor WLD
George Madison	DNR – Fisheries	Dist. Supervisor FSH
Darren Krammer	DNR – Fisheries	FSH Biologist, Upper Lake Michigan Fish Unit
Lt. Tim Robson	DNR – LED	Dist. Supervisor LED
Jim Ferris	DNR – FMFM	FMFM Timber Management Specialist
John Hamel	DNR – FMFM	FMFM Planner
Rob Katona	DNR – FMFM	FMFM ORV Trail Specialist
Deb Begalle	DNR – FMFM	Dist. Supervisor FMFM
Terry McFadden	DNR – Wildlife	WLD Biologist
Bill Brondyle	DNR – FMFM	Unit Manager
Kevin LaBumbard John Koski Dean Wilson Tom Seablom Theresa Sysol	DNR – FMFM	Foresters
Pete Glover	DNR – FMFM	FMU Fire Supervisor
Kay Countryman Jerry Maki Dan Nathan Brian Mensch	DNR – FMFM	Fire Officers
Kevin Swanson	DNR - Wildlife	Habitat Biologist assigned to Shingleton, EUP but ¼ time in W UP
Monica Weis	DNR – FMFM	Secretary (office)

Exit Briefing**Location: Gwinn, MI****Date: October 29, 2008**

Name	Organization	Title/position
Mike Ferrucci	NSF-ISR	SFI Lead Auditor, FSC Auditor
Dr. Robert Hrubes	SCS	FSC Lead Auditor, SFI Auditor
Lynne Boyd	DNR – FMFM	Chief, FMFM
Cara Boucher	DNR – FMFM	Assistant Chief, FMFM; State Forester
Bill Sterrett	DNR – FMFM	Section Manager, Forest Resource Mgmt.
Mike Paluda	DNR – FMFM	Field Coordinator, UP
Dennis Nezich	DNR - FMFM	Forest Certification Specialist
Penney Melchoir	DNR – Wildlife	Field Operations Supervisor
Larry Pedersen	DNR - FMFM	Planning and Operations Unit Leader, Lansing
David Price	DNR – FMFM	Certification Planner
Kim Herman	DNR - FMFM	Monitoring Specialist
Cara Boucher	DNR – FMFM	Assistant Chief, FMFM; State Forester
Capt. Tom Courchaine	DNR - LED	Field Coordinator – Law Enforcement Division
Steve Scott	DNR - Fisheries	Basin Coordinator East UP
Bill O’Neill	DNR – FMFM	LP Field Coordinator
Dayle Garlock	DNR – FMFM	District Supervisor – East LP
John Pilon	DNR – FMFM	District Planner – East LP
Al Stewart	DNR - Wildlife	Upland Game Bird Specialist, Lansing
Russ Mason	DNR - Wildlife	Chief, Wildlife Division
Ron Murray	DNR – FMFM	Forest Health, Inventory, Monitoring Unit Sup.
Lisa Dygert	DNR – FMFM	Resource Analyst, Lansing
Terry MacFadden	DNR - Wildlife	Habitat Biologist, Gwinn
Kevin LaBumbard	DNR – FMFM	Forester, Gwinn
John Hamel	DNR – FMFM	District Planner – W UP
Theresa Sysol	DNR – FMFM	Forester, Gwinn
Bill Brondyke	DNR – FMFM	Unit Manager, Gwinn
John Koski	DNR – FMFM	Forester, Gwinn
Debbie Begalle	DNR – FMFM	District Supervisor – W UP
Lt. Tim Robson	DNR - LED	District Supervisor – W UP

2.4 Status of Prior, Open Corrective Action Requests

As detailed below, all Corrective Action Requests issued during the 2008 surveillance audit are being closed as part of the 2009 surveillance audit. That is, the auditors were satisfied that the actions undertaken by Michigan DNR in response to the 2008 CARs were sufficient to warrant closure of the CARs. However, for some of the underlying issues there remain aspects of the DNR's management system that merit further actions in order to assure full conformity with the certification standard. As such, some of the now closed 2008 CARs are followed up with related CARs issued as part of the 2009 surveillance audit. Those follow-on CARs are presented in Section 2.6, below.

Open Corrective Action Requests from the 2008 Audit:

<p>Observation: Although an extension for completing the Regional State Forest Plans and Eco-regional Plans has been agreed to and the extension is backed by key stakeholders, we must take note of the fact that the intended completion dates for these important plans has been pushed back multiple times. However, getting these plans “done right” is more important than the timeframe. Nevertheless, these continued postponements and delays in completing key planning processes and plan documents undermines DNR's credibility with many stakeholders and it puts DNR's certifiers in an awkward position. Clearly, these plans must be completed.</p>	
CAR 2008.1	<p>a) The DNR must pursue every opportunity to accelerate the biodiversity conservation planning process (BCPP) and provide SCS with a detailed timeline of key milestones in the process.</p> <p>b) The DNR must dedicate adequate resources to support the three key planning initiatives (BCPP, Regional State Forest Management Plans, Eco-Regional Plans). Clearly, a significant element of this will be addressing the planning staff vacancy in the EUP region.</p>
Deadline	Part a) February 1, 2009. Part b): Surveillance audit 2009
Reference	<i>FSC Criterion/Indicator 7.1.a.1</i>
<p>DNR Response/Auditor Comments: The DNR conveyed to the auditors additional evidence of ongoing biodiversity and planning efforts. For instance, new biodiversity core design teams have been established as well as a statewide assist team. As well, 6 workshops at field units were held in the past year. A contract with the Michigan Natural Features Inventory was awarded. The commitment of sufficient staff resources to complete the BCPP and the RSFMPs at the earliest possible time, and in the face of declining resources, is the core of DNR's response to this CAR.</p> <p>On the basis of the corrective actions undertaken by Michigan DNR , this CAR is now CLOSED. See the follow-up CAR, below.</p>	

Observation: ORV management and enforcement on Drummond Island is problematic. Some roads segments that have traditionally been accessible to non-ORV user groups, including the general public, are currently so substantially degraded as to be inaccessible or accessible only to vehicles with 4WD capabilities. ORV policies also must be responsive to the objectives of all Divisions within the DNR; field personnel in the Wildlife Division do not believe that road conditions on certain segments of roads on Drummond Island are consistent with Wildlife Division management objectives as well as funding requirements. Some roads on Drummond Island are not maintained in accordance with DNR's BMPs for

roads. The current routes used by Jeeps and large 4wd vehicles are, in places, not passable by 2WD vehicles and have inadequate provisions for drainage (surfacing, road crown, etc). FMFM staff have responded to the SCS auditors that these roads are being upgraded, often with provisions for adequate road surface and/or drainage even when there is intent to keep water on the roadway to respond to ORV user desires. That is, plans are under development to include sections that are not fully drained. There are no existing BMPs or standards for such roads that would ensure environmental protections (while offering the desired recreational experience).

Is it possible and appropriate to manage roads for what ORV user groups want while assuring the protection of natural resources? Can all Divisions that are involved in the co-management of the state forest lands achieve consensus on the issue of providing recreational opportunities for jeeps and Hummers?

CAR 2008.2	<ul style="list-style-type: none"> a) The DNR must clarify the legal definitions and current management practices for ORV use on state lands in order to ensure consistency of enforcement and promote cross-Division support. b) The DNR must describe, in written form, acceptable conditions in locations where the intent is to provide motorized recreational use opportunities associated with standing water and mud bogs on ORV routes within the state forest system, such as those found on Drummond Island.
Deadline	Part a) June 1, 2009; Part b): Surveillance audit 2009
Reference	<i>FSC Criterion/Indicator 1.1.a, 2.2.a, and 2.2.b</i>
DNR Response/Auditor Comments: The Department provided a robust response to this CAR through development of the “Drummond Island Work Group Summary and ORV Route Proposal” which was developed with stakeholder and cross-divisional support. Additionally, a specially convened working group defined acceptable conditions for designating off-road vehicle (ORV) routes on Drummond Island roads that may not meet the definition of a forest road. The corrective actions are all considered by the audit team to be directly responsive to the CAR but it is noted that the scope of DNR’s efforts is focused on Drummond Island whereas the CAR is only partially focused on Drummond Island.	
On the basis of the corrective actions undertaken by Michigan DNR , this CAR is now CLOSED. See follow-up CAR, below.	

Observation: There is some confusion between the FMFM and Wildlife Divisions within the Michigan DNR as to what constitutes in-scope and out-of-scope lands for its FSC certification. It is SCS’ understanding that only the wildlife lands in the Southern Lower Peninsula (SLP) are out-of-scope because most are prairies, oak-savannahs or wetlands. That is, SCS understands that all lands within the state forest system in the NLP and UP are within the scope of the certificate regardless of factors such as the funding source for acquisition. SCS has certified DNR’s management of that land system and SCS expressly understands that DNR’s management is a cooperative endeavor amongst all of the divisions comprising the department. *SCS has not certified only the FMFM Division of the DNR.*

CAR 2008.3	The Michigan DNR shall clarify the scope of what it considers to be covered by its FSC forest management certificate.
Deadline	May 1, 2009
Reference	<i>FSC Criterion 1.6, FSC Indicator 1.6.b</i>
DNR Response/Auditor Comments: On July 1, 2009 and again on October 15, 2009, FMFM	

leadership issued two memoranda to field units in which the “lands in scope” for the FSC (and SFI) certification were addressed and clarified. Both memoranda were distributed widely within the Department as well as copied to the certification bodies.

With these two memoranda, we conclude that the Department has satisfactorily clarified for DNR staff which State Game and Wildlife Management Units are within the scope of certification.

On the basis of the corrective actions undertaken by Michigan DNR , this CAR is now CLOSED.

Observation: The Michigan DNR undergoes an internal audit process and is commended for undertaking such a positive action. Once the internal audit is complete, though, it is not adequately clear to the SCS auditors how staff of the DNR respond to the findings of the internal audits. Documentation confirming the extent of follow-up is needed. Several of the “Internal Audit Non-Conformance Report” documents contain proposed completion dates for implementing responses to internal corrective action requests. However, the “Actual Completion Date” sections remain blank even when the proposed completion date has passed.

CAR 2008.4	The Michigan DNR shall provide documentation as to how the organization uses the results of the internal auditing process to monitor the effectiveness of and improve day to day operations, standard procedures, and the State Forest Management Plan. Furthermore, the Michigan DNR shall ensure that its internal auditing procedures are followed until completion.
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Deadline	Surveillance audit 2009
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Reference	<i>FSC Criteria 7.2 and 9.4</i>
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DNR Response/Auditor Comments: On October 27, 2009, the audit team received a face-to-face briefing from DNR Forest Certification Specialist, Dennis Nezich. In this presentation, Nezich described the changes that were instituted in response to this CAR, most importantly establishing that district supervisors are directly responsible for assuring that all non-conformities identified during internal audits are appropriately acted upon such that full closure is reached within the time frames specified by the internal auditors. As part of this presentation, Dayle Garlock provided an overview of updates to the RDR system intended to improve the effectiveness of the system in terms of better assuring full response to identified resource issues..

On the basis of the corrective actions undertaken by Michigan DNR , this CAR is now CLOSED.

2.5 General Observations from the 2009 Surveillance Audit

The audit team’s observations for 2009 are based upon field visits to 4 FMU’s (Pigeon River Country, Roscommon, Baraga and Gwinn). Approximately – field sites were visited across these 4 FMUs. During the course of the audit, over 80 DNR employees representing divisions, headquarters staff and field staff from throughout the Department were interviewed, either in large group, small group or one-on-one formats. In addition to field observations and interpersonal interviews, the audit team also reviewed numerous planning and operations documents associated with the 4 FMUs as well as documents associated with the open CARs.

On the basis of this information, our general observation is that DNR's commitment to FSC certification and the requirements thereof remains very strong. Progress made in addressing non-conformities identified in 2008 was solid. Employee engagement in key initiatives of high relevance to DNR's FSC certification remains commendable. While ongoing/chronic budgetary restrictions continue to raise new challenges for Departmental personnel, both in terms of their general mandates in management of the state forest system but also with regard to maintaining adequate conformity to the certification standard, the audit team once again came away with a strong, positive sense that the management of the Michigan State Forests merits recognition under the FSC program.

2.6 New Corrective Action Requests and Recommendations Resulting from the 2009 Surveillance Audit

<p>Observation: Note: this is a follow-on observation pertaining to the issues addressed in CAR 2008.1 which was closed during the October 2009 annual surveillance audit.</p> <p>The Biodiversity Conservation Planning Process (BCPP) remains a critical link in the Department's multifaceted large-scale, strategic planning initiative. As such, timely completion of the BCPP remains of high importance. An important element of the BCPP is to articulate those activities within delineated Biodiversity Stewardship Areas that are considered to be compatible with the underlying conservation objectives for BSA's. Without this guidance, the planning teams are unable to complete the BSA delineation process. This requires the specification of field level and planning level guidance on compatible (allowed) uses in BSA's.</p>	
CAR 2009.1	DNR must develop and implement field level and planning level guidance as to what land use activities are considered acceptable within designated Biodiversity Stewardship Areas; that is, activities that are deemed compatible with the underlying biodiversity conservation objectives.
Deadline	June 15, 2010
Reference	<i>FSC Criterion/Indicator 7.1.a.1</i>

<p>Observation: Note: this is a follow-on observation pertaining to the issues addressed in CAR 2008.2 which as closed during the October 2009 annual surveillance audit.</p> <p>In response to CAR 2008.2, the DNR established a standards committee (headed up by Steve DeBrabander) that developed ORV Route standards for application to Drummond Island. The limited scope of application is not fully responsive to CAR 2008.2 and necessitates this follow-on CAR. While ORV issues, and lack of clarity regarding ORV Route designations, were addressed on Drummond Island, the issues may occur in the future in other locations in the State Forest system.</p>	
CAR 2009.2	Written assurance, endorsed by the FMFM Chief, must be provided to SCS that, in the future event DNR were to provide motorized recreational use opportunities, such as those found on Drummond Island, elsewhere within the State Forest system, that the standards established for Drummond Island (in response to CAR 2008.2) would apply.
Deadline	March 15, 2010

Reference	<i>FSC Criterion/Indicator 1.1.a, 2.2.a, and 2.2.b</i>
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Note: On March 17, 2010, MIDNRE conveyed a letter to SCS, signed by Chief Boyd, confirming that “if motorized vehicle use opportunities, such as those found on Drummond Island, area offered elsewhere within the state forest system the standards established for Drummond Island would apply.” We consider this written commitment, endorsed by senior management, to constitute full compliance with the corrective action request. **As a result of the evidence provided by DNR, and adjunct to the finalization to this audit report, CAR 2009.2 is now CLOSED.**

Observation: During the discussions held at the Pigeon River Country state forest unit, it was revealed that DNR managers as well as share croppers are deploying GMO corn on state forest property for the purpose of establishing wildlife feed plots (in the case of DNR deployment). The lead auditor pointed out to the attendees at this discussion that use of GMO plant materials on FSC-certified forests is prohibited. DNR field personnel were not aware of this requirement and central office personnel were not aware of the use of GMO corn by field staff.	
CAR 2009.3	DNR must rectify the non-conformance with FSC Criterion 6.8 by either ceasing use of GMO plant materials on all lands “within scope” or take actions that will excise those lands on which GMOs are used from within the scope of their FSC certification. In selecting which option to pursue, DNR personnel should consult with personnel from the Wisconsin and Minnesota Departments of Natural Resources as this same issue as previously arisen in those states.
Deadline	April 15, 2010
Reference	<i>FSC Criterion 6.8</i>

Observation: The DNR has established within-stand retention policy for regeneration harvests. Currently, the DNR is also developing Michigan Woody Biomass Retention guidelines (a draft version existed at the time of the 2009 surveillance audit). DNR is presently unable to assure the auditors that the within-stand retention policy, if properly followed, will lead to compliance with the draft biomass retention guidelines.	
REC 2009.1	DNR should conduct an analysis to determine if the within-stand retention policy is fully compatible with (insures compliance with) the draft Michigan Wood Biomass Retention Guidelines.
Reference	<i>FSC Criterion 6.3, Regional Indicator 6.3.a.5.</i>

2.7 General Conclusions of the 2009 Annual Surveillance Audit

Based upon information gathered through site visits, interviews with DNR staff as well as stakeholders, and document reviews, the SCS audit team concludes that Michigan DNR’s management of State of Michigan Forest Properties continues to be in strong and improving overall compliance with the FSC Principles and Criteria, as further elaborated by the Lake States-Central Hardwoods Region Standard (V3.0). That is, and while there remain aspects of the management program for which improved conformity to the regional certification standard is

needed, the SCS audit team concludes from this (2009) annual audit that Michigan DNR’s forest management program is in adequate overall conformance with FSC Principles 1 through 9 (Principle 10 is not applicable as DNR’s operations are classified as “natural forest management” under the FSC definitions). As such, continuation of the certification is warranted, subject to ongoing progress in closing out the open CARs and subject to subsequent annual audits.

3.0 DETAILED OBSERVATIONS

This Section is divided into two parts: Section 3.1 details the determining of conformance and non-conformance with selected elements of the standard examined during this audit. Criteria within the following conformity table that do not have an annotation in the conformity column were not within the scope of this year’s audit. Section 3.2 discusses any stakeholder comments.

3.1 Evaluation of Conformance

Those Criteria and Indicators that were within the scope of this annual surveillance audit are those with annotations in the following conformity table. C&I without annotations were not within the scope of this year's audit.

REQUIREMENT	C/N C	COMMENT/CAR
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	Overall, continuing adequate conformance despite the ongoing delays in updating existing and completing new management plans.
1.1.a. Forest management plans and operations comply with federal, state, county, municipal, and tribal laws, case law, and regulations. <i>For example:</i> <ul style="list-style-type: none"> • All necessary permits are obtained. • There is neither evidence nor substantial claims of continued or intentional non-compliance with laws and regulations that relate to forest management by the forest owner or manager. 	+/-	See CAR 2009.2. Additional policy guidance is needed for assuring that ORV activity associated with Drummond Island, if occurring elsewhere within the state forest system, must be guided by the same or equivalent new policies that have been developed for Drummond Island.
1.1.b. Forest management plans and operations comply with state Best Management Practices (BMPs) (see Appendix for references) and other government forest management guidelines applicable to the forest, both voluntary and regulatory (see also Criterion 6.5). <i>For example:</i> <ul style="list-style-type: none"> • Compliance with state, watershed, county, and planning district regulations. 		
1.1.c. Forest management plans and operations meet or exceed all applicable laws and administrative requirements with respect to sharing public information, opening records to the public, and following procedures for public participation.		
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	Ongoing conformity observed during the 2009 surveillance audit
1.2.a. Taxes on forest land and timber, as well as other fees related to forest management, are paid in a timely manner and in accordance with state and local laws. <i>For example:</i> <ul style="list-style-type: none"> • Tax receipts verify that property and excise taxes have been paid. 		
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.	C	No change from prior audits—no new evidence suggests non-conformity
1.3.a. Forest management operations comply with all binding treaties or other agreements to which the U.S. is a party, including treaties with American Indian tribes.		

<p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>There is no evidence of non-compliance with relevant treaties and agreements.</i> 		
<p>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 by the involved or affected parties.</p>	C	DNR has a clear track record of actively communicating with SCS about any matter related to their certification
<p>1.4.a. Where conflicts between laws and FSC Principles and Criteria occur, they are referred to the appropriate FSC body.</p>		
<p>C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</p>	C	DNR actively controls unauthorized and illegal activities on the state forests. Unauthorized off-road vehicular use remains a management issue but the situation is improving
<p>1.5.a. Forest owners or managers implement measures to prevent illegal and unauthorized activities in the forest.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The land manager paints and posts boundary notices, uses gates, makes periodic inspections, and reports illegal activities to the proper authorities.</i> 	+	DNR has undertaken an initiative to improve ORV trail signage, which will hopefully reduce incidences of unauthorized/illegal activity
<p>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p> <p><i>Applicability note to Criterion 1.6.: Assessment of this criterion is guided by both FSC Policy and Guidelines: Partial Certification for Large Ownerships (FSC POL 20-001 Partial Certification and the FSC Guidelines for Certification Bodies FSC-STD-20-001 (version 2-1)) both available at http://www.fsc.org/en/whats_new/documents/Docs_cent/2.</i></p>	C	With some minor exceptions, now clarified in a memorandum conveyed to SCS on July 1, 2009, all of the lands within the state forest system are included in the scope of the certificate.
<p>1.6.a. Forest owners or managers provide written statements of commitment to the FSC Principles and Criteria. The commitment is stated in the management plan [see 7.1], a document prepared for the certification process, or another official document.</p>		
<p>1.6.b Forest owners or managers document the reasons for seeking partial certification.</p>		
<p>1.6.c Forest owners or managers document strategies and silvicultural treatments for several harvest entries that meet the FSC Principles and Criteria (see Principle 7).</p>		
<p>P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>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.</p> <p><i>Applicability Note: Property rights of private landowners are respected. The forest owner or manager of privately owned land retain their private property rights, while simultaneously honoring the rights of adjacent landowners.</i></p>		
<p>2.1.a. Forest owners or managers document the legal and customary rights associated with the forest. These rights include both those held by the party seeking certification and those held by other parties.</p>		

2.1.b. Affected land boundaries are clearly identified on the ground by the forest owner or manager prior to commencement of management activities.		
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. <i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i>	C	Adequate conformity but ORV use, as found on Drummond Island requires additional policy guidance if such use is allowed elsewhere.
2.2.a. The forest owner or manager allows legal and customary rights to the extent that they are consistent with the conservation of the forest resource and the objectives stated in the management plan. <i>For example:</i> <ul style="list-style-type: none"> • <i>Hiking, hunting, and fishing on non-posted property.</i> • <i>Visiting ancestral gravesites.</i> 	+/-	In response to CAR 2008.2, the DNR established a standards committee (headed up by Steve DeBrabander) that developed ORV Route standards for application to Drummond Island. The limited scope of application is not fully responsive to CAR 2008.2 and necessitates this follow-on CAR. While ORV issues, and lack of clarity regarding ORV Route designations, were addressed on Drummond Island, the issues may occur in the future in other locations in the State Forest system. See CAR 2009.2
2.2.b. On ownerships where customary use rights or traditional and cultural areas/sites exist, forest owners or managers consult with concerned groups in the planning and implementation of forest management activities.	+/-	See CAR 2009.2
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.	C	
2.3.a. The forest owner or manager maintains relations with community stakeholders to identify disputes while still in their early stages. If disputes arise, the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If negotiation fails, existing local, state, Federal, and tribal laws are employed to resolve claims of land tenure (see Glossary).	+	DNR engaged in an exemplary effort to solicit stakeholder input and involvement in formulating appropriate policies for addressing the unique ORV issues on Drummond Island. The stakeholder advisory group that was put together through the leadership of Mike Paluda was exemplary. The new Resource Damage Report (RDR) system was rolled out to DNR staff last fall and it allows most DNR staff to enter and report issues. The intent is that citizens can contact local DNR managers to report incidents or sites of resource damage, and staff will then enter this information into the data base.
2.3.b. The forest owner or manager provides information to the certification body regarding unresolved and/or ongoing disputes over tenure and use-rights.	+	DNR has been fully forthcoming in keeping SCS informed about ongoing efforts to resolve the ORV use issues on Drummond Island
P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected. <i>Applicability Note: Under Principle 3, the terms “tribes,” “tribal,” or “American Indian groups” include all indigenous peoples in the U.S., groups or individuals, who may be organized in recognized or unrecognized tribes, bands, nations, native corporations, or other native groups.</i>		
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.		
3.1.a. On tribal lands, forest management and planning includes a process for input by tribal members in accordance with their		

<p>laws and customs.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Forest owners or managers utilize tribal experience, knowledge, practices, and insights in forest management planning and operations on tribal lands when requested to do so by the tribal landowner.</i> 		
<p>3.1.b. Forest management on tribal lands is delegated or implemented by an authorized tribal governing body.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>A tribal body that is either elected or based on hereditary appointment authorizes the forest management operations.</i> • <i>Documents verify the authority of the tribal body.</i> 		
<p>C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	C	DNR continues to enhance its outreach and collaboration with Michigan-based tribes
<p>3.2.a. Forest owners or managers identify and contact American Indian groups that have customary use rights or other legal rights to the management area and invite their participation in the forest planning processes, appropriate to the scale and intensity of the operation. (see also Criterion 4.4.)</p>		
<p>3.2.b. Steps are taken during the forest management planning process and implementation to protect tribal resources that may be directly affected by certified operations such as adjacent lands, bodies of water, critical habitats, and riparian corridors as well as other resource uses such as rights to hunt, fish, or gather.</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>	C	DNR continues to enhance its outreach and collaboration with Michigan-based tribes, thereby further reducing the likelihood that resources sites of indigenous value will be adversely impacted by management activities on the State Forests.
<p>3.3.a. Forest owners or managers make systematic efforts to identify areas of cultural, historical, and/or religious significance. They invite participation of tribal representatives (or other appropriate persons, where tribal entities are lacking) in the identification of current or traditionally significant sites within the forest proposed for certification.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Such efforts include surveying, recording, assessment, establishment, and use of special use and protected areas when and where they are mandated by treaty rights.</i> • <i>Forest owners or managers check existing heritage and cultural databases.</i> • <i>Areas of cultural, historical, and religious significance as well as areas of traditional use, are documented by authorized tribal leaders or their designated representatives.</i> <p><i>For example, areas of special significance may include:</i></p> <ul style="list-style-type: none"> • <i>Ceremonial, burial, or village sites;</i> • <i>Areas used for hunting, fishing, or trapping;</i> • <i>Current gathering areas for culturally important or ceremonial materials, such as Basket materials, medicinal</i> 		

<p><i>plants, or plants used in dances;</i></p> <ul style="list-style-type: none"> • <i>Current gathering areas for subsistence uses, such as mushrooms, berries, acorns, etc.</i> 		
<p>3.3.b. Forest owners and managers consult with tribal leaders (or other appropriate persons, where tribal entities are lacking) to develop mechanisms that ensure forest management operations protect from damage or interference those areas described in 3.3.a. and incorporate these special places into forest management and operational plans.</p>		
<p>3.3.c. Confidentiality of disclosures is maintained in keeping with applicable laws and the requirements of tribal representatives.</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 operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</p>		
<p>3.4.a. Forest owners and managers respect the confidentiality of tribal knowledge and assist in the protection of tribal intellectual property rights.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>When traditional ecological knowledge is requested for use in forest management, protocols are jointly developed with local tribes to protect the intellectual property rights of those tribes.</i> 		
<p>3.4.b. A written agreement is reached with individual American Indians and/or tribes prior to commercialization of their indigenous intellectual property, traditional knowledge, and/or forest resources. The individuals and/or tribes are compensated when such commercialization takes place.</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>4.1.a. Opportunities for employment, contracting, procurement, processing, and training are as good for non-local service providers as they are for local service providers doing similar work.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Forest owners or managers give local goods and service providers an equal opportunity to bid on all contracts and services.</i> • <i>Timber sales are offered in quantities and intervals that allow participation by local companies of all sizes.</i> • <i>Forest owners or managers utilize qualified local employees and contractors.</i> 		
<p>4.1.b. Forest work is packaged and offered in ways that create quality work opportunities for employees, contractors, and their</p>		

<p>workers.</p> <p><i>For example, quality work can include, the following attributes:</i></p> <ul style="list-style-type: none"> • <i>Employee and contractor relationships that are long term and stable;</i> • <i>A mixture of diverse tasks that require varying skill levels;</i> • <i>Opportunities for employees to advance;</i> • <i>A comprehensive package of benefits;</i> • <i>Opportunities for employee and contractor participation in decision-making;</i> • <i>Employment conditions (e.g., remuneration, benefits, safety equipment, training, and workman’s compensation) are as good for non-local workers as they are for local workers doing the same job;</i> • <i>Forest owners or managers provide and/or support training opportunities for workers to improve their skills.</i> 		
<p>4.1.c. Forest owners or managers contribute to public education about forestry practices.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The forest is offered as a training and/or educational resource for local people in conjunction with schools, community colleges, and/or other providers of training and education.</i> 		
<p>4.1.d. Forest owners or managers participate and invest in the local economy and civic activities.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Forest owners or managers participate in fund-raisers, field days, and local forestry committees.</i> • <i>Facilities and equipment are regularly maintained and updated.</i> • <i>Out-of-area owners maintain a local office.</i> • <i>The forest owner or manager supports local business development by working with organizations, such as chambers of commerce.</i> 		
<p>4.1.e. Employee compensation and hiring practices meet or exceed the prevailing local norms for work within the forest industry that requires equivalent education, skills, and experience.</p>		
<p>4.1.f. Forest owners or managers assure that contractors, subcontractors, intermediaries, and persons hired by them are covered and protected by all state and Federal labor laws regarding discrimination, wages, benefits, and other conditions of employment.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Contracts contain clauses specific to legal coverage and protection.</i> • <i>Owners and managers monitor compliance with laws.</i> • <i>Employees are not discriminated against because of gender, race, religion, age, or disability.</i> 		
<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>4.2.a. The forest owner or manager and their contractors develop and implement safety programs and procedures.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • Machinery and equipment are well-maintained and safe. • Safety equipment appropriate to each task is used. • Safety procedures are documented and posted in the workplace. • Education in safety is offered (such as Forest Industry Safety Training Alliance and Game of Logging). • Contracts include safety requirements. • For employees, safety records, training reports, and certificates are maintained. 		
<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><i>Applicability Note: This Criterion is guided by FSC guidelines on ILO Conventions (http://www.fsc.org/en/whats_new/documents/Docs_cent/2).</i></p>		
<p>4.3.a. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>		
<p>4.3.b. Forest owners or managers and their contractors develop effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p> <p><i>Examples of culturally sensitive mechanisms are:</i></p> <ul style="list-style-type: none"> • Translation and cultural interpretation, when needed; • Cross-cultural training, when needed, to integrate the workforce. 		
<p>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.</p> <p><i>Applicability Note: People and groups directly affected by management operations may include: employees and contractors of the landowner, neighbors, fishers, hunters and gatherers, recreationalists, water users, and forest products processors.</i></p>	C/NC	<p>Social impact assessment, as an explicit component of the DNR's management system is marginally in conformance, as is the case with the vast majority of FSC-certified operations</p> <p>DNR operates at a high level of conformity with the component of this Criterion that requires forest managers to engage in consultation with people and groups directly affected by management operations.</p>
<p>4.4.a. On lands with multiple owners, a process is provided that assures the opportunity for fair and reasonable input from the landowners and/or shareholders.</p>	+	<p>Examples of solid conformity to this Indicator arose during this year's audit: PRC's citizen advisory group, the ad hoc citizen group focusing on ORV issues on Drummond Island, rolling out the new RDR system for broad use by DNR field staff as well as providing a mechanism for citizen-identified issues to be logged in by DNR personnel</p>
<p>4.4.b. Input is sought in identifying significant sites of archeological, cultural, historical, or community importance, that are to be designated as special management zones or otherwise protected during operations.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • State archeological offices, universities, and local experts have been consulted to identify known areas and develop 		

<i>protection plans.</i>		
4.4.c. Viewpoints and feedback are solicited from people and groups directly affected by forest management operations and its associated environmental and aesthetic effects (e.g., logging, burning, spraying, and traffic). Significant concerns are addressed in management policies and plans.		
4.4.d. Forest owners or managers of large and mid-sized (see Glossary) forests provide opportunities for people directly affected by management operations to provide input into management planning.		
4.4.e. For public forests, consultation will include the following components: <i>Note: ‘The public’ includes people and groups directly affected by management operations and all citizens of the relevant jurisdiction.</i> <i>Applicability Note: For the purposes of indicator 4.4.e each numbered component should be scored separately.</i>		
i) Legislative and historical mandates are included in the plan, and provisions are made for their accomplishment. <i>For example:</i> <ul style="list-style-type: none"> • <i>Legal mandates are carried out.</i> 		
2. Clearly defined and accessible methods for public participation are provided in both the strategic (long-range) and tactical (short-range) planning processes, including initial adoption and subsequent amendments. <i>Applicability Note: Strategic plans may be very general. Tactical plans are specific and describe candidate stands for proposed silvicultural activities.</i> <i>For example:</i> <ul style="list-style-type: none"> • <i>Administrative rules or other documentation are provided for public input.</i> • <i>Some routine activities with little or no environmental impact that appear unlikely to solicit input may be exempted from the procedures of public notification and comment. Examples of such activities include, but are not limited to:</i> <ol style="list-style-type: none"> 1. <i>Maintaining existing buildings or structures</i> 2. <i>Maintaining existing permanent roads or trails</i> 3. <i>Maintaining existing open-land areas (e.g., mowing grass)</i> 4. <i>Minor changes to tactical plans (e.g., small changes to areas affected)</i> • <i>Public agencies solicit public input as early as practicable into the process.</i> 		
3. Public notification is sufficient to allow interested citizens of the affected jurisdiction and/or other people and groups directly affected by management operations the chance to learn of upcoming opportunities for public review and/or comment on		

the proposed management.		
<p>i) The final planning decisions are based on legal mandate, public input, credible scientific analysis, and the productive capacity of the land and are made by professional employees, hired by the public, or other legally authorized parties.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • Evidence of how public comments are considered is provided. 		
<p>j) An accessible and affordable appeals process to planning decisions is available.</p> <p><i>Note: FSC certification does not preclude any individual or group from seeking legislative or judicial relief.</i></p>		
<p>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.</p> <p><i>Applicability Note: Provisions of Criterion 4.5. do not evoke protections or liabilities beyond those provided by Federal, state, and local laws.</i></p>		
4.5.a. The forest owner or manager attempts to resolve grievances and mitigate damage resulting from forest management activities through open communication and negotiation prior to legal action.		
4.5.b. Forest owners or managers and their contractors have adequate liability insurance.		
<p>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.</p>		
<p>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.</p>		
5.1.a. The forest owner or manager is willing and able to support long-term forest management (i.e., decades rather than quarter-years or years), such as planning, inventory, resource protection, and post-harvest management activities.		
5.1.b. Responses (such as increases in harvests or debt load) to short-term financial factors (such as market fluctuations and sawmill supply requirements) are limited to levels that enable fulfillment of the management plan.		
5.1.c. Investment and/or reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity.		

<p><i>For example:</i></p> <ul style="list-style-type: none"> • Investments have been made in forest stand improvement activities and information systems. • Forest conditions confirm that investments are adequate. 		
<p>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</p>		
<p>5.2.a. Opportunities are given to local, financially competitive, value-added processing and manufacturing facilities.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • The technical and financial specifications of some sales of forest products are scaled to allow successful competition by small businesses. 		
<p>5.2.b. When non-timber products are harvested, the management and use of those products is incorporated into the management plan.</p>		
<p>5.2.c. New markets are explored for products from common but underutilized forest species.</p>		
<p>C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>		
<p>5.3.a. Adequate quantities and a diversity of size classes of woody debris (considered a reinvestment of biological capital under this criterion—not an economic waste) are left on the forest floor to maintain ecosystem functions, wildlife habitats, and future forest productivity.</p>		
<p>5.3.b. The loss and/or waste of merchantable forest products is minimized.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • Harvested products are handled to minimize potential loss in value. • Waste from on-site processing facilities (e.g., portable sawmills) is minimized and used as an input into a productive process. 		
<p>5.3.c. Harvest practices minimize residual stand damage.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • Soil compaction, rutting, and erosion are minimized. • Provisions that define acceptable levels of residual damage are included in operational contracts. • Low-impact logging techniques are used. • Non-timber forest products are protected from damage by management activities. • Bumper trees are utilized and equipment is selected and used in a way that minimizes unintentional damage to residual trees. 		
<p>C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>		

<p>5.4.a. Forest management diversifies forest uses and products, while maintaining forest composition, structures, and functions.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Compatible uses may include recreation, ecotourism, hunting, fishing, and specialty products.</i> 		
<p>C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p> <p><i>The Working Group considers that this criterion is sufficiently explicit and measurable, so does not require indicators.</i></p>		
<p>C5.6. The rate of harvest of forest products shall not exceed levels that can be permanently sustained.</p>		
<p>5.6.a. The sustainability of harvest levels is based on growth and regeneration data, site index models, soil classification, and/or desired future conditions. The required level of documentation is determined by the scale and intensity of the operation.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Stocking rates, growth rates, and removal volumes conform to projections of the long-term written management plan.</i> • <i>The age-class distribution (see Glossary) required for a sustainable-yield volume is justified by data.</i> 		
<p>5.6.b. After the species composition and the age-class (see Glossary) distribution commensurate with long-term sustainability have been achieved, harvest and growth records demonstrate that the volume harvested during any 10-year span is less than the net growth accumulated over that same period. Exceptions to this constraint may be granted to forest owners or managers whose periodic cycle of re-entry is longer than 10 years. In such cases, allowable harvest is determined by examining the volume of re-growth and removal since the previous harvest and the forest owner or manager's commitment to allow an equivalent amount of re-growth before additional harvests.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Rapid growth rates in younger forests are not used as the sole justification for the harvest of slower-growing, older forests.</i> 		
<p>5.6.c. If rates of harvest are temporarily accelerated to compensate for or prevent unacceptable mortality, or in cases of salvage operations (see Indicator 6.3.c.4), the rate of future harvest is recalculated accordingly to meet desired future conditions, and the adjusted rate of harvest is implemented within three years of the temporary acceleration.</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</p>	<p>C</p>	<p>DNR's overall approach to identifying and giving due consideration to</p>

<p>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><i>Applicability Note: Small forest owners or managers who practice low intensity forestry may meet this requirement with brief, informal assessments. More extensive and detailed assessments (e.g., formal assessments by scientists) are expected by large forest owners or managers and/or those who practice more intensive forestry management (see Glossary).</i></p>		<p>possible adverse environmental impacts associated with planned management activities represents a solid level of conformity to this Criterion.</p>
<p>6.1.a. Using credible scientific analyses and local expertise, an assessment of current conditions is completed to include:</p> <ul style="list-style-type: none"> • Disturbance regimes and successional pathways; • Unique, vulnerable, rare, and threatened communities; • Common plants, animals, and their habitats; • Sensitive, threatened, and endangered species and their habitats; • Water resources; and • Soil resources (see also Indicators 7.1.a and b). 		
<p>6.1.b. Using available science and local expertise, the current ecological conditions are compared to both the historical conditions and desired future conditions within the landscape context. This comparison is done by employing the baseline factors identified in 6.1.a.</p>		
<p>6.1.c. Prior to the commencement of management activities, potential short-term environmental impacts and their cumulative effects are evaluated.</p>	+	<p>The RDR system is now available for field staff to post incidents of possible resource damage</p>
<p>6.1.d. Using assessments derived from the above information, management options are developed and implemented to achieve the long-term desired future conditions and ecological functions of the forest (see also Criterion 7.1).</p>	+	<p>DNR demonstrated good conformity with this Indicator by working with an ad hoc citizen advisory group to identify/elaborate management options for resolving ORV use issues on Drummond Island</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>6.2.a. Although species that are state and/or Federally listed as threatened, endangered, of special concern, or sensitive, and their habitats are identified, their specific locations remain confidential.</p> <p><i>Note: On public forests and large private forests, the general locations of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species are made available to the public.</i></p>		

<p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The forest owner or manager has contacted the state natural heritage program (or its equivalent) to obtain a list of listed species and their habitat or community type to document their presence or potential presence.</i> • <i>An on-the-ground survey for listed species has been conducted.</i> • <i>The locations of such species are mapped.</i> • <i>Management plans provide descriptions of activities appropriate for maintaining such species' habitat(s).</i> • <i>Management activities are compatible with endangered species recovery plans and/or habitat conservation plans.</i> • <i>Evidence of communication and/or collaboration with relevant experts is demonstrated.</i> • <i>The forest owner or manager participates in programs to protect listed species.</i> • <i>Forestry staff receives training in the identification of listed species and their habitat requirements.</i> 		
<p>6.2.b. If scientific data indicate the likely presence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive populations, either new surveys are carried out before field-management activities begin or the forest owner or manager assumes their presence and makes appropriate modifications in forest management.</p>		
<p>6.2.c. For management planning purposes, forest owners or managers of publicly owned and large privately owned forests use, participate in, or carry out on-the-ground assessments for the occurrence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The forest owner or manager uses an appropriate survey for listed species.</i> 		
<p>6.2.d. Where they have been identified, state and/or Federally listed as threatened, endangered, of special concern, or sensitive species and their habitats are maintained and/or restored. Multiple-use management activities are acceptable, where the law allows, in these species' habitat areas to the extent that they are compatible with maintenance and restoration of the species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Within the context of existing landscape and ownership patterns, conservation zones for listed species and other protected areas are arranged to enhance the viability of habitats, including their connectivity.</i> 		
<p>6.2.e. If a state and/or Federally listed as threatened, endangered, of special concern, or sensitive species is determined to be present, its location is reported to the manager of the species' database.</p>		
<p>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</p>		

productivity of the forest ecosystem.		
C6.3.a. Forest regeneration and succession		
<i>Applicability Note: Indicators 6.3.a.1. through 6.3.a.4. are intended to be applied sequentially.</i>		
<p>6.3.a.1. Forest owners or managers make management decisions using credible scientific information (e.g., site classification) and information on landscape patterns (e.g., land use/land cover, non-forest uses, habitat types); ecological characteristics of adjacent forested stands (e.g., age, productivity, health); species' requirements; and frequency, distribution, and intensity of natural disturbances.</p> <p><i>Applicability Note: This indicator may apply only marginally to managers of small and mid-sized forest properties because of their limited ability to coordinate their activities with other owners within the landscape or to significantly maintain and/or improve landscape-scale vegetative patterns.</i></p>	+	Management policies and actions at PRC reflect a landscape-scale perspective where conditions on surrounding properties are considered when forming management direction on the State Forest
<p>6.3.a.2. Silvicultural practices encourage regeneration that moves the forest toward a desired future condition, consistent with information gathered in 6.3.a.1.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Native species suited to the site are selected for regeneration.</i> • <i>Within five years of a regeneration harvest, adequate regeneration exists to move the stand toward desired future conditions. Exceptions are noted and documented.</i> <p><i>Note: Development of a forest that is capable of natural regeneration, based on desired future conditions, is encouraged.</i></p>		
<p>6.3.a.3. Measures are taken to ensure the retention of endemic and difficult-to-regenerate species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Deer populations are controlled to enhance successful regeneration.</i> 		
<p>6.3.a.4. Across the forest, or the landscape in which it is located, management actions lead to a distribution of successional stages, age classes, and community types appropriate to the scale and intensity of the operation and desired future conditions.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Large forests are managed so that large, contiguous, and interconnected patches of habitat are well distributed across the landscape, in such a way as to allow dispersal of species sensitive to fragmentation.</i> • <i>Within a context of liability and public safety, large forests and public forests are managed to allow the occurrence of natural components, structures, and disturbance regimes.</i> 		
6.3.a.5. When even-aged management (see Glossary) is	+/-	The DNR has established within-stand retention policy for regeneration

<p>employed, live trees and native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type (see Glossary). Exceptions may be allowed when retention at a lower level is necessary for purposes of forest restoration and/or rehabilitation or to maintain community types that exist on the site (e.g., oak-hickory, jack pine). The level of retention increases proportionally to the size of the harvest unit.</p>		<p>harvests. Currently, the DNR is also developing Michigan Woody Biomass Retention guidelines (a draft version existed at the time of the 2009 surveillance audit). DNR is presently unable to assure the auditors that the within-stand retention policy, if properly followed, will lead to compliance with the draft biomass retention guidelines.</p> <p>See REC 2009.1</p> <p>There is no upper limit on the size of even-aged regeneration harvest units.</p>
<p>C6.3.b. Genetic, species, and ecosystem diversity</p>		
<p>6.3.b.1. Forest management conserves native plant and animal communities and species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Declining trees and snags (see Glossary) are left in the forest.</i> • <i>Vertical and horizontal structural complexity is maintained.</i> • <i>Diversity of understory species is maintained.</i> • <i>Well-distributed, large woody debris is maintained.</i> • <i>Habitats and refugia for sedentary species and those with narrow or special habitat requirements are created and/or maintained.</i> • <i>Artificial regeneration uses locally adapted seed and seedlings.</i> 		
<p>6.3.b.2. The forest owner or manager cooperates with local, state, and Federal agencies to protect and manage native plant and animal communities and species.</p>		
<p>6.3.b.3. There is a consistent scientific method for selecting trees to plant, harvest and retain in order to preserve and/or enhance broad genetic and species diversity.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Phenotypic diversity is maintained, in accordance with desired future conditions.</i> 		
<p>6.3.b.4. Forest owners or managers maximize habitat connectivity to the extent possible at the landscape level (e.g., through an ecological classification system, at the subsection or land-type association level).</p> <p><i>For example, habitat connectivity is enhanced by:</i></p> <ul style="list-style-type: none"> • <i>Creating habitat corridors and protecting riparian management zones (RMZs) (see Glossary) between habitats;</i> • <i>Changes in harvest-patch block (see Glossary) sizes, harvest patterns, and land use changes to create connectivity among existing patches of habitat;</i> • <i>Restoration plantings specifically to increase connectivity among existing patches of habitat.</i> 		
<p>C6.3.c. Natural cycles that affect the productivity of the forest ecosystem</p>		
<p>6.3.c.1. Biological legacies of the forest community are retained at the forest and stand levels, consistent with the objectives of the management plan, including but not limited to:</p>		

<p>large live and declining trees, coarse dead wood, logs, snags, den trees, and soil organic matter.</p>		
<p>6.3.c.2. Forest management practices maintain soil fertility and organic matter, especially in the A horizon, while minimizing soil erosion and compaction. If degradation of soil quality occurs, as indicated by declining fertility or forest health, forest owners or managers modify soil management techniques.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Primary management objectives shift from commercial production to restoration.</i> • <i>Site preparation is minimized.</i> • <i>Road system design and construction is upgraded.</i> • <i>The lightest practical equipment with the lowest ground pressure is used.</i> • <i>Whole-tree harvesting is discontinued, and tops are left in the forest.</i> • <i>Longer rotations and a diversity of species are used in lieu of artificial fertilization.</i> • <i>Processes of natural early succession are allowed or encouraged.</i> 		
<p>6.3.c.3. Forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools), and forested riparian areas (see also Criterion 6.5).</p>		
<p>6.3.c.4. Responses (such as salvage) to catastrophic events (such as wildfire, blowdown, and epidemics) are limited by ecological constraints.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Adequate coarse woody debris is maintained.</i> • <i>Adequate den trees and snags are maintained.</i> • <i>Endemic levels of 'pest' populations are allowed before pest control actions are carried out.</i> 		
<p>*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.</p> <p><i>Applicability Notes:</i></p> <p><i>When forest management activities (including timber harvest) create and maintain conditions that emulate an intact, mature forest or other successional phases that may be under-represented in the landscape, the management system that created those conditions may be used to maintain them, and the area may be considered as a representative sample for the purposes of meeting this criterion.</i></p> <p><i>Ecologically viable representative samples are designated to serve one or more of three purposes: (1) to establish and/or maintain an ecological reference condition; (2) to create or maintain an under-represented ecological condition (e.g., successional phases of a forest type or natural community (see</i></p>		

Glossary); and (3) to protect a feature that is sensitive, rare, or unique in the landscape. Areas serving the purposes of (1) and (2) may move across the landscape as under-represented conditions change, or may be fixed in area and managed to maintain the desired conditions. Areas serving the purposes of (3) are fixed in location.

For managed forest communities in the Lake States, ecologically mature or late-successional phases (not including old growth) are generally under-represented and would qualify as representative sample areas under purposes 1 and 2. Tolerant or long-lived mid-tolerant species (e.g., white pine.) typically dominate such stands. Depending on the site and forest community, characteristics may include a well-developed understory flora, relative stability of species composition, multi-layered canopies, stable or declining live timber volume, live trees in upper quartile of expected diameter growth for the site, presence of recognized late-successional indicator species (such as certain mosses, lichens or other epiphytes), and accumulation of large snags and large downed woody material. Examples of classification systems that include some of these concepts are: “Types of Old Growth Forests” as defined by Minnesota Department of Natural Resources

(<http://www.dnr.state.mn.us/forests/oldgrowth/types.html>), and, Minnesota DNR Old-Growth Forest Policy – Goals and Results, at <http://www.dnr.state.mn.us/forests/oldgrowth/policy.html>.

For representative sample areas that may move across the landscape as conditions change (purposes 1 and 2), the length of time that an area is maintained as a representative area will vary with the rarity of the ecosystem type and specific ecological value to be conserved, the uniqueness of the represented condition, the rate at which areas with similar characteristics develop.

Examples of representative samples fixed in place and serving purpose 3 include relatively exceptional features such as fens, vernal pools, areas surrounding caves, and areas of special soils containing endemic plant species.

In most cases, intact old-growth (see Glossary) will qualify as representative sample under purpose 3 due to their rarity in the Lake States Region. Unentered old-growth stands (see Glossary) are also prime candidates for designation as representative sample areas under purpose 3. In both cases, the burden is on the landowner/manager to demonstrate that these areas should NOT qualify as representative sample areas under purpose 3. Other very old forests (over 150 years old) that do not meet the Lake States Standard’s strict definition of “old growth” (e.g., there is some evidence of past harvesting) should also be considered as potential representative sample areas under purpose 3

Forests of all sizes may be conducive to protection of fixed features, such as rock outcrops and bogs. Medium sized and large forests may be more conducive to the maintenance of successional phases and disturbance patterns than small

<p><i>forests.</i></p> <p><i>While public lands (see Glossary) are expected to bear primary responsibility for protecting representative samples of existing ecosystems, FSC certification of private lands can contribute to such protection.</i></p> <p><i>Representative samples may be protected solely by the conditions of the certificate and/or through the use of conservation easements or other instruments of long-term protection.</i></p>		
<p>6.4.a. Forest owners and managers protect and reserve ecologically viable representative areas that are appropriate to the scale and intensity of the operation.</p>		
<p>6.4.b. Where existing protected areas within the landscape are not of adequate size and configuration to serve as representative samples of commonly occurring forest types as defined above, owners or managers of mid-sized and large forests, whose properties are conducive to the establishment of such areas, designates ecologically viable areas to serve these purposes.</p> <p><i>Applicability notes to 6.4.b.: When evaluating the need for representative sample areas, the assessment should consider the relative rarity and degree of protection of similar areas at the state-wide scale, or at the biophysical region scale (as defined by state Natural Heritage programs) if Natural Heritage program or other assessments suggest that there is significant variation in community or ecosystem types between biophysical regions. Where existing protected areas adequately represent commonly occurring forest types in the landscape, these areas may suffice as the representative samples and no representative sample need be established on the forest</i></p> <p><i>The owner or manager of a small forest may not be expected to designate representative sample(s) of commonly occurring forest types, except where there is an exceptional opportunity to contribute to an under-represented protected areas system. For small forests or low-intensity managed forests, this criterion is satisfied by meeting the standards of Criteria 6.2.</i></p> <p><i>The size and configuration of the representative areas depend on the:</i></p> <ol style="list-style-type: none"> <i>(1) extent of representation of their forest types within the landscape (less protection calls for more representative samples);</i> <i>(2) ecological importance of setting aside stands and tracts to other conservation efforts (a minimum size and ecological value is needed to make representative samples useful); and</i> <i>(3) intensity of forest management within the forest and across the landscape (a less intensively managed forest or landscape calls for less area of representative samples, and a more intensively managed forest or landscape calls for more).</i> 		
<p>6.4.c. The size and arrangement and time scale of on-site</p>		

<p>representative sample areas are designated and justified using assessment methods and sources of up-to-date information described in 6.1.</p> <p><i>Note: Known protected off-ownership areas that are in proximity to the management unit may be used to meet the goal in the landscape.</i></p>		
<p>6.4.d. Unless exceptional circumstances can be documented, known areas of intact old-growth forests are designated as representative sample areas under purpose 3. (See Applicability Note under 6.4 above) and are reviewed for designation as High Conservation Value Forests (HCVF- see also Applicability note under 6.3). Known areas of unentered stands of old-growth are carefully reviewed, screened for uniqueness, and considered as potential representative sample areas prior to undertaking any active management within them (see Applicability Note under 6.4). Old growth stands not designated as either a HCVF or a representative sample area are, at a minimum, managed to maintain their old-growth structure, composition, and ecological functions under purpose 3.</p>		
<p>6.4.e. The size and extent of representative samples on public lands being considered for certification is determined through a transparent planning process that not only utilizes scientifically credible analyses and expertise but is also accessible and responsive to the public.</p>		
<p>6.4.f. The process and rationale used to determine the size and extent of representative samples are explicitly described in the public summary.</p>		
<p>6.4.g. Managers of large, contiguous public forests (>50,000 acres) create and maintain representative protected areas within the forest area, sufficient in size to encompass the scale and pattern of expected natural disturbances while maintaining the full range of forest types and successional stages resulting from the natural disturbance regime.</p>		
<p>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.</p> <p><i>Note: The Lakes States-Central Hardwoods Regional Certification Standards cover a diverse landscape – from prairie to glaciated Northern lands to unglaciated forests in the South. Within this region, all States have developed best management practice guidelines specific to their ecological conditions (see Appendix A). These locally developed guidelines serve as the base requirement for implementation of this standard.</i></p>		
<p>6.5.a. A set of forestry best management practices (BMPs), approved by the state forestry agency or otherwise appropriate jurisdiction (e.g., BIA), that address water quality and soil erosion is adhered to (see also 1.1.b). These guidelines may include provisions on riparian management zones (RMZs), skidding, access roads, site preparation, log landings, stream crossings, disturbance of sensitive sites, and wetlands.</p>		

<p>6.5.b. At a minimum, implementation of BMPs and other resource protection measures will result in the following:</p> <ul style="list-style-type: none"> • <u>Logging and Site Preparation</u> <p>Logging operations and construction of roads and skid trails are conducted only during periods of weather when soil is least susceptible to compaction, surface erosion, or sediment transport into streams and other bodies of water.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Operations are carried out when soils are either dry enough or frozen enough to minimize disturbance and compaction.</i> • <i>Vehicular access to roads is controlled to limit soil erosion and other forest damage.</i> <p>Logging damage to regeneration and residual trees is minimized during harvest operations.</p> <p>Silvicultural techniques and logging equipment vary with slope, erosion hazard rating, and/or soil instability with the goal of minimizing soil disturbance. Areas that exhibit an extreme risk of landslide are excluded from management activities that may precipitate landslides.</p> <p><i>Note: "Extreme risk" is a legally binding term in some states.</i></p> <p>Plans for site preparation specify the following mitigations to minimize impacts to the forest resources:</p> <p>(1) 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.</p> <ul style="list-style-type: none"> i) Top soil disturbance and scarification of soils is limited to the minimum necessary to achieve successful regeneration of desired species. <ul style="list-style-type: none"> • <u>Transportation System (including permanent and temporary haul roads, skid trails, and landings)</u> <p>The transportation system is designed, constructed, maintained, and/or reconstructed to minimize the extent of the road network and its potential cumulative adverse effects.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Road density is minimized.</i> • <i>Displacement of soil and the sedimentation of streams, as well as impacts to water quality, are minimized.</i> • <i>Patches of habitat and migration corridors are conserved as much as possible.</i> • <i>The integrity of riparian management zones (see Glossary) and buffers (see Glossary) surrounding other valuable ecological elements (e.g., wetlands, habitat for sensitive species, and interior old-growth forest) is conserved.</i> <p>Access to temporary and permanent roads is controlled to</p>		
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<p>minimize significant adverse impacts to soil and biota while allowing legitimate access, as addressed by Principles 3 and 4 and identified in the management plan.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Roads without a weather resistant surface (e.g., soil, dirt, or native-surfaced roads) are used only during periods of weather when conditions are favorable to minimize road damage, surface erosion, and sediment transport.</i> • <i>Vehicle access is restricted on roads not immediately necessary for management purposes.</i> <p>Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.</p> <ul style="list-style-type: none"> • <u>Stream and Water Quality Protection</u> <p>Stream crossings are located and constructed in a way that minimizes fragmentation of aquatic habitat (see Glossary) and protects water quality.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Crossings of riparian management zones are kept to a minimum.</i> • <i>Stream crossings are perpendicular to the waterway.</i> • <i>Culverts allow free passage of aquatic organisms.</i> <ul style="list-style-type: none"> • <u>Visual and Aesthetic Considerations</u> <p>Forest owners or managers limit and/or reduce negative impacts on visual quality caused by forest management operations.</p>		
<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>		
<p>6.6.a. Forest owners and managers demonstrate compliance with FSC Policy paper: “Chemical Pesticides in Certified Forests, Interpretation of the FSC Principles and Criteria, July 2002” (available at http://www.fsc.org/en/whats_new/documents/Docs_cent/2) and comply with prohibitions and/or restrictions on 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.</p>		
<p>6.6.b. Forest owners or managers employ silvicultural systems, integrated pest management, and strategies for controlling</p>		

<p>vegetation that minimize negative environmental effects. Non-chemical techniques are preferred in the implementation of these strategies.</p> <p><i>For example, components of silvicultural systems, integrated pest management, and strategies to control vegetation may include:</i></p> <ul style="list-style-type: none"> • <i>creation and maintenance of habitat that discourages pest outbreaks</i> • <i>creation and maintenance of habitat that encourages natural predators</i> • <i>evaluation of pest populations and establishment of action thresholds</i> • <i>diversification of species composition (see Glossary) and structure</i> • <i>use of low impact mechanical methods</i> • <i>use of prescribed fire</i> 		
<p>6.6.c. Forest owners or managers develop written strategies for the control of pests as a component of the management plan (see Criterion 7.1).</p>		
<p>6.6.d. If chemicals are applied, the most environmentally safe and efficacious chemicals are used. Chemicals are narrowly targeted, and minimize effects on non-target species.</p>		
<p>6.6.e. Chemicals are used only where they pose no threat to supplies of domestic water, aquatic habitats, or Rare species or plant community types.</p>		
<p>6.6.f. If chemicals are used, a written prescription is prepared that describes the risks and benefits of their use and the precautions that workers will employ.</p>		
<p>6.6.g. 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.</p>		
<p>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.</p>		
<p>6.7.a. In the event of a spill of hazardous material, forest owners or managers immediately contain the material, report the spill as required by applicable regulations, and engage qualified personnel to perform the appropriate removal and remediation.</p>		
<p>6.7.b. Waste lubricants, anti-freeze, containers, and related trash are stored in a leakproof container until they are transported to an approved off-site disposal site.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Management operations incorporate resource recycling and reuse programs when they are available.</i> 		

6.7.c. Broken or leaking equipment and parts are repaired or removed from the forest.		
6.7.d. Equipment is parked away from riparian management zones, sinkholes, or supplies of ground water.		
<p>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.</p> <p><i>Applicability Note: Genetically improved organisms (e.g., Mendelian crossed) are not considered to be genetically modified organisms (see Glossary), and may be used. The prohibition of genetically modified organisms applies to all organisms, including trees. This Criterion is guided by FSC guidelines on GMO's (http://www.fsc.org/en/whats_new/documents/Docs_cent/2).</i></p>	C/NC	<p>During the discussions held at the Pigeon River Country state forest unit, it was revealed that DNR managers as well as share croppers are deploying GMO corn on state forest property for the purpose of establishing wildlife feed plots (in the case of DNR deployment). The lead auditor pointed out to the attendees at this discussion that use of GMO plant materials on FSC-certified forests is prohibited. DNR field personnel were not aware of this requirement and central office personnel were not aware of the use of GMO corn by field staff.</p> <p>See CAR 2009.3</p>
6.8.a. Exotic (i.e., non-indigenous), non-invasive predators or biological control agents are used only as part of a pest management strategy for the control of exotic species of plants, pathogens (see Glossary), insects, or other animals when other pest control methods are, or can reasonably be expected to prove, ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for indigenous species because, for example, exotic species can host pathogens that might diminish biodiversity in the forest.		
<p>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p>		
6.9.a. Except on plantation sites (see also Criterion 10.4), the use of exotic tree species is permitted only in the first successional stages or other short-term stages for the purposes of restoring degraded ecosystems.		
<p>6.9.b. The use of exotic species (see Glossary) is contingent on peer-reviewed scientific evidence that the species in question is non-invasive and will not diminish biodiversity. If non-invasive exotic species are used, the provenance and location of use are documented, and their ecological effects are actively monitored.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Non-invasive exotic plants that are sown to control erosion are used only when suitable native species are not readily available.</i> 		
<p>6.9.c. Written documentation is maintained for the use of exotic species.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Species mixes, rates, locations, and times of application are all recorded.</i> 		

6.9.d. Forest owners or managers develop and implement control measures for invasive exotic species.		
<p>C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</p> <p>i) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p> <p><i>Applicability Note: Forest management activities that are part of an approved management plan, including road construction and habitat restoration (such as creation of openings in the forest for wildlife habitat and the maintenance or creation of wetlands or prairies) are not conversions for the purposes of this criterion.</i></p>		
6.10.a. Over the life of the ownership, forest to non-forest conversions are limited to the threshold of 1% of the forest area or 100 acres, whichever is smaller, except that a parcel up to two acres in size may be converted for residential use by the forest owner or manager.		
6.10.b. When private forestlands are sold, a portion of the proceeds of the sale is reinvested in additional forest lands and/or forest stewardship.		
<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:</p> <p>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.</p> <p>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><i>Applicability Note: The management plan may consist of a variety of documents not necessarily unified into a single planning document but which represents an integrated strategy for managing the forest within the ecological, economic, and social limitations of the land. The plan includes a description and rationale for management elements</i></p>	C/NC	<p>Conformity to this Criterion remains at the margin, due to the continued delays in completing large-scale strategic plans. See CAR 2009.1</p> <p>Of positive note, DNR has made solid progress in the regional planning initiative over the past year.</p>

<p><i>appropriate to the scale, intensity, and goals of management, and may include:</i></p> <ul style="list-style-type: none"> Silvicultural systems <ul style="list-style-type: none"> Regeneration strategies Maintenance of structural and species diversity Pest control (disease, insects, invasive species, and vegetation) Soil and water conservation Methods and annual rates of harvest, by species and products Equipment and personnel needs Transportation system Fire management <ul style="list-style-type: none"> Prescribed fires Wildfires Fish and wildlife and their habitats (including non-game species) Non-timber forest products <ul style="list-style-type: none"> Methods and annual rates of harvest, by species and products Regeneration strategies Socioeconomic issues <ul style="list-style-type: none"> Public access and use <i>Conservation of historical and cultural resources</i> Protection of aesthetic values Employee and contractor policies and procedures Community relations Stakeholder notification Public comment process For public forests, legal and historic American Indian issues <ul style="list-style-type: none"> Protection of legal and customary rights Procedures for integrating tribal concerns in forest management Management of sites of special significance Special management areas <ul style="list-style-type: none"> High Conservation Value Forests Riparian management zone Set asides of samples of representative existing ecosystems Sensitive, rare, threatened, and endangered species protection Other protected areas Landscape level analyses and strategies 		
<p>7.1.a. Management objectives</p>		
<p>7.1.a.1. A written management plan is prepared that includes the landowner's short-term and long-term goals and objectives (ecological, social, and economic). The objectives are specific, achievable, and measurable.</p>	<p>+/-</p>	<p>The Biodiversity Conservation Planning Process (BCPP) remains a critical link in the Department's multifaceted large-scale, strategic planning initiative. As such, timely completion of the BCPP remains of high importance. An important element of the BCPP is to articulate those activities within delineated Biodiversity Stewardship Areas that are considered to be compatible with the underlying conservation objectives for BSA's. Without this guidance, the planning teams are unable to complete the BSA delineation process. This requires the specification of field level and planning level guidance on compatible (allowed) uses in BSA's. See CAR 2009.1</p> <p>Prescribed under-burns in white pine stands in the Baraga FMU have</p>

		not been effectively executed in terms of the objective of creating greater white pine regeneration
<p>7.1.a.2. The management plan describes desired future conditions that will meet the long-term goals and objectives and that determine the silvicultural system(s) and management activities to be used.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>The management plan includes a description of forest resources to be managed, environmental limitations, the status of land use and ownership, socioeconomic conditions, and a profile of adjacent lands.</i> • <i>See 7.1.b.1, 7.1.b.2, 7.1.b.3, 7.1.b.4, 7.1.b.5, and 7.1.b.6 for additional examples</i> 		
7.1.b. Description of forest resources to be managed, environmental limitations, land use and ownership status, socioeconomic conditions, and profile of adjacent lands		
7.1.b.1. The management plan describes the timber, fish and wildlife, harvested non-timber forest products, soils, and non-economic forest resources.		
7.1.b.2. The management plan includes descriptions of special management areas; sensitive, rare, threatened, and endangered species and their habitats; and other ecologically sensitive features in the forest.		
7.1.b.3. The management plan includes a description of past land uses and incorporates this information into the vision, goals, and objectives.		
7.1.b.4. The management plan identifies the legal status of the forest and its resources (e.g., ownership, usufruct rights (see Glossary), treaty rights, easements, deed restrictions, and leasing arrangements).		
7.1.b.5. The management plan identifies relevant cultural and socioeconomic issues (e.g., traditional and customary rights of use, access, recreational uses, and employment), conditions (e.g., composition of the workforce, stability of employment, and changes in forest ownership and tenure), and areas of special significance (e.g., ceremonial and archeological sites).		
7.1.b.6. The management plan incorporates landscape-level considerations within the ownership and among adjacent and nearby lands, including major bodies of water, critical habitats, and riparian corridors shared with adjacent ownerships.		
7.1.c. Description of silvicultural and/or other management system		
7.1.c.1. Silvicultural system(s) and prescriptions are based on the integration of ecological and economic characteristics (e.g., successional processes, soil characteristics, existing species composition and structures, desired future conditions, and market conditions). (see also sub-Criterion 6.3.a)		
7.1.c.2. Prescriptions are prepared prior to harvesting, site		

preparation, pest control, burning, and planting and are available to people who implement the prescriptions.		
7.1.d. Rationale for the rate of annual harvest and species selection		
7.1.d.1. Calculations for the harvests of both timber and non-timber products are detailed or referenced in the management plan and are based on net growth, yield, stocking, and regeneration data. (see also 5.6.b)		
7.1.d.2. Species selection meets the social and economic goals and objectives of the forest owner or manager and leads to the desired future conditions while maintaining or improving the ecological composition, structures, and functions of the forest.		
7.1.d.3. The management plan addresses potentially disruptive effects of pests, storms, droughts, and fires as they relate to allowable cut.		
7.1.e. Provisions for monitoring forest growth and dynamics.		
7.1.e.1. The management plan includes a description of procedures to monitor the forest.		
7.1.f. Environmental safeguards based on environmental assessments (see also Criterion 6.1).		
7.1.g. Plans for the identification and protection of rare, threatened, and endangered species. (see also Criterion 6.3)		
7.1.h. Maps describing the forest resource base including protected areas, planned management activities, and land ownership.		
7.1.h.1. The management plan includes maps of such forest characteristics as: relevant landscape-level factors; property boundaries; roads; areas of timber production; forest types by age class; topography; soils; riparian zones; springs and wetlands; archaeological sites; areas of cultural and customary use; locations of sensitive, rare, threatened, and/or endangered species and their habitats; and designated High Conservation Value Forests.		
7.1.i. Description and justification of harvesting techniques and equipment to be used. (see also Criterion 6.5)		
7.1.i.1. Harvesting machinery and techniques are discussed in the management or harvest plan and are specifically matched to forest conditions in order to minimize damage.		
7.1.i.2. Conditions for each timber sale are established by a timber sale contract or written harvest prescription and accompanying timber sale map. <i>For example:</i> <ul style="list-style-type: none"> • <i>Timber sale contracts and harvest prescriptions provide detailed specifications of how trees are to be harvested.</i> 		
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.		

<p>7.2.a. Operational components of the management plan are reviewed and revised as necessary or at least every 5 years. Components of the long-term (strategic) management plan are revised and updated at the end of the planning period or when other changes in the management require it. (see also Criterion 8.4)</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • The rationale for changes in the management plan is stated in subsequent revisions. • Relevant provisions of the management plan are modified in response to such changes as fire, market conditions, or damage to the road system. 		
<p>C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</p>		
<p>7.3.a. The forest owner or manager assures that workers are qualified to implement the management plan (see also Criterion 4.2).</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • Loggers and other operators participate in informal and formal training, such as Forest Industry Safety Training Alliance, Game of Logging. • Professional foresters and resource managers meet continuing education standards, such as the Society of American Foresters “Certified Forester” program. • The forest owner or manager utilizes directories that either list or are based on worker qualifications. <p>7.3.b. The management plan is understandable, comprehensive, and readily available to field personnel.</p>		
<p>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.</p> <p><i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 8.5)</i></p>	C	All DNR planning documents are publicly available and most are posted on the DNR web site.
<p>7.4.a. A management plan summary that outlines management objectives (from sub-Criterion 7.1.a.), whether on private lands or the land pool under a resource manager, is available to the public at a reasonable fee. Additional elements of the plan may be excluded, to protect the security of environmentally sensitive and/or proprietary information.</p>		
<p>7.4.b. Managers of public forests make forestry-related information easily accessible (e.g., available on websites) for public review, including that required by Criterion 7.1.</p>		
<p>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.</p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal,</i></p>		

<i>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.		
8.1.a. The frequency of monitoring activities follows the schedule outlined in the management plan.		
8.1.b. Monitoring is carried out to assess: <ul style="list-style-type: none"> • The degree to which management goals and objectives have been achieved; • Deviations from the management plan; • Unexpected effects of management activities; • Social (see Criterion 4.4) and environmental (see Criterion 6.1) effects of management activities. 		
8.1.c. Public and large, private land owners or managers take the lead in identifying, initiating, and supporting research efforts to address pertinent ecological questions. Small and medium private landowners or managers use information that has been developed by researchers and other managers.		
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.		
8.2.a. Yield of all forest products harvested.		
8.2.a.1. The forest owner or manager maintains records of standing inventories of timber and harvest volumes of timber and non-timber species (quality and quantity). <i>For example:</i> <ul style="list-style-type: none"> • <i>Significant unanticipated removal of forest products (e.g., theft and poaching) is monitored and recorded.</i> 		
8.2.b. Growth rates, regeneration, and condition of the forest		
8.2.b.1. An inventory system is established and records are maintained for: <ol style="list-style-type: none"> 1. Timber growth and mortality (for volume control systems); 2. Stocking, and regeneration; 3. Stand-level and forest-level composition and structure (e.g., by use of tools, such as ecological classification systems); 4. Abundance, regeneration, and habitat conditions of non-timber forest products; 5. Terrestrial and aquatic features; 6. Soil characteristics (e.g., texture, drainage, existing erosion); 7. Pest conditions. 		

8.2.c. Composition and observed changes in the flora and fauna		
8.2.c.1. Forest owners or managers periodically monitor the forest for changes in major habitat elements and in the occurrence of sensitive, rare, threatened, or endangered species or communities.		
8.2.d. Environmental and social impacts of harvesting and other operations		
8.2.d.1. The environmental effects of site-disturbing activities are assessed (e.g., road construction and repair, harvesting, and site preparation). <i>For example:</i> <ul style="list-style-type: none"> • <i>Monitoring for compliance with Best Management Practices is carried out.</i> • <i>A monitoring program is in place to assess the condition and environmental impact of the road system and landings.</i> 		
8.2.d.2. Creation or maintenance of local jobs and public responses to management activities are monitored.		
8.2.d.3. Sites of special significance to American Indians are monitored in consultation with tribal representatives (see also Principle 3).		
8.2.e. Cost, productivity, and efficiency of forest management		
8.2.e.1. Forest owners or managers monitor the cost and revenues of management in order to assess productivity and efficiency.		
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.” <i>Applicability Note: For chain-of-custody management requirements, see Section 3.6 of Chain of Custody Standards, FSC Accreditation Manual.</i>		
C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.		
8.4.a. Discrepancies between the results of management activities or natural events (i.e. yields, growth, ecological changes) and expectations (i.e. plans, forecasts, anticipated impacts) are appraised and taken into account in the subsequent management plan.		
C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2. <i>Applicability Note: Forest owners or managers of private</i>		

forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 7.4)		
8.5.a. A summary outlining the results of monitoring is available to the public at a reasonable fee, whether on private lands or a land pool under a resource manager or group certification.		
8.5.b. Managers of public forests make information related to monitoring easily accessible (e.g., available on websites) for public review.		

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.

High Conservation Value Forests are those that possess one or more of the following attributes:

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

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

Central Hardwoods:

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

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens ©
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern (b)

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

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

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

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

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

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.

Applicability Note: Certain information may be withheld from public discussion to protect the attributes that may be of High Conservation Value. The level of delineation and consultations required is dependent on the scale and intensity of the operation.

9.1.a. Attributes and locations of High Conservation Value Forests are determined by:

- (1) Globally rare, threatened, or endangered features, habitats, or ecosystems that may be present in the forest (suggested sources of information are: The Nature Conservancy, World Wildlife Fund, Conservation International, World Resources Institute);
- (2) Regionally and locally rare, threatened, or endangered features, habitats, or ecosystems that may be present in the forest; culturally and tribally significant areas; or municipal watersheds that may be present in the landscape and/or certified forest (suggested sources of information include natural and cultural heritage agencies);
- (3) Appropriate consultations with local and regional scientists and other stakeholders;
- (4) Public review of proposed HCVF attributes and areas on large-scale and public ownerships (see also 7.4, 4.4.e., 4.4.f.);
- (5) Integration of information from consultations and public review into proposed HCVF delineation;
- (6) Delineation by maps and habitat descriptions.

C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.

Note: FSC understands that Criterion 9.2 is an instruction to Certification Bodies and that no indicators are required.

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

<p>measures shall be specifically included in the publicly available management plan summary.</p> <p><i>Applicability Note: The applicability of the precautionary principle (see Glossary) and the consequent flexibility of forest management vary with the size, configuration, and tenure of the HCVF:</i></p> <p>a) <i>More flexibility is appropriate where an HCV forest is less intact, larger in area, has a larger area-to-perimeter ratio, and its tenure is assured over the long term.</i></p> <p>b) <i>Less flexibility is appropriate where an HCV forest is more intact, covers a smaller area, has a smaller area-to-perimeter ratio, and future tenure is uncertain, based on social considerations.</i></p>		
<p>9.3.a. Forest management plans and activities are appropriate for maintaining, enhancing and/or restoring attributes that make the area an HCVF.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Passive management activities are carried out when they maintain, enhance, or restore HCVF characteristics and/or enlarge the size of the HCVF.</i> • <i>When prescribed burns, removal of invasive species, and integrated pest management activities are carried out, they occur in a manner consistent with maintenance, protection and/or restoration of HCVF characteristics.</i> • <i>When timber harvesting is carried out, it occurs in a manner that is consistent with HCVF maintenance, enhancement, or restoration.</i> 	+	<p>Management plans and programs on River Country FMU are exemplary in protecting and enhancing identified high conservation values (e.g., blue ribbon trout streams, elk habitat management)</p> <p>FMFM generally has a positive and collaborative relationship with MNFI staff, across all FMUs</p>
<p>9.3.b. Active management in HCVFs is allowed only when it maintains or enhances high conservation values.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Maintenance of old-growth and HCVF attributes may be carried out by: (1) removal of exotic species and (2) use of controlled burning.</i> 		
<p>9.3.c. The management-plan summary includes information about HCVF management without compromising either the confidentiality of the forest owner or manager or environmentally and culturally sensitive features (see also sub-Criterion 7.1.f).</p>		
<p>9.3.d. Forest owners or managers of HCVFs (forests and/or stands) coordinate conservation efforts with forest owners or managers of other HCVFs in the landscape.</p>		
<p>C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>		
<p>9.4.a. Forest owners or managers of small forests may satisfy this requirement with informal observations (see 8.1 and 8.2.). When observations detect changes, the changes are documented.</p>		
<p>9.4.b. Forest owners or managers of mid-sized and large forests monitor activities within and adjacent to HCVFs that may affect HCVF attributes (see Criteria 7.2, 8.1 and 8.2). Monitoring is</p>		

adequate to track changes in HCV attributes, and may include informal observations. When monitoring detects changes to HCV attributes, the changes are documented.		
<p>P10 Plantations shall be planned and managed in accordance with Principles and Criteria 1 9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</p> <p><i>Applicability note: Plantations are forest areas lacking most of the principal characteristics and key elements of native ecosystems, as a result of such human activities as planting, sowing, or intensive silvicultural treatments like short-term rotations and short-term coppice systems (see Glossary)(see Criterion 6.9 for use of exotics).</i></p> <p><i>Planting, seeding, and coppicing do not necessarily result in plantations. Non-forest land being afforested becomes a plantation or a managed natural forest based on the owner's goals and objectives for the land in question as well as the development of its attributes.</i></p> <p>As was determined 5 years ago, silvicultural management systems employed on the Michigan State Forests clearly conform with the FSC definition of “natural forest management.” As such, Principle 10 is not applicable to the evaluation of DNR’s forest management program.</p>		

3.2 Stakeholder Comments

Stakeholder comments during the past year were limited to comments solicited by the lead auditor shortly prior to the October 2009 surveillance audit. No unsolicited comments were received from Michigan stakeholders. The focus of the solicited stakeholder comments was DNR’s ongoing strategic planning initiatives (regional state forest plans, biodiversity conversation planning, eco-regional planning and the statewide forest plan (that had been completed subsequent to the 2008 annual surveillance audit.

Stakeholders contacted were generally satisfied with DNR’s rationale for again pushing back the time frames for completing the regional state forest plans. That is, the stakeholders contacted agree with the premise that it is in the best interests of the final outcome that the biodiversity conservation planning initiative be given time for completion so that the results could inform the regional state forest plans.

3.3 Controversial Issues

With regard to this requisite subject matter for FSC certification reports, there is no change from the 2008 surveillance audit. There are no exceptionally controversial issues that dominate public discourse over the management of the Michigan state forests. Public lands forest management remains an arena with intrinsic tensions between widely divergent stakeholder desires and expectations as to how public lands should be managed. This dynamic is been relatively more narrowly focused and less intense as compared to some other state forest systems that hold FSC certificates. It is our sense that DNR’s ongoing efforts to actively involve key stakeholders,

across the spectrum, in planning and advisory initiatives has had a positive effect in reducing the intensity of concern with key issues such as design and timeframes for completing regional plans and appropriate approaches to managing for early successional forest cover.

3.4 Changes in Certificate Scope

During 2009, and in response to the corrective action request issued during the 2008 annual surveillance audit, the DNR reviewed the question of which Division of Wildlife Management Areas are considered to be within the scope of their FSC certificate. In a written memorandum conveyed to SCS in July 2009 and again as part of the 2009 audit, DNR clarified that the scope of their certificate includes all those state lands managed by the DNR that are inventoried under either the “OI” or “IFMAP” system, are identified in a state forest compartment and are included in the state forest system. As such, parcels such as state game areas in southern Michigan are excluded from the scope of the certificate.