2023 FOREST CERTIFICATION

MANAGEMENT REVIEW REPORT

Final Report
July 16, 2024

Approved by the DNR Resource Bureau Management Team

Forest Resources Division
IC4506 (Revised 05/24/2024

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For information or assistance on this publication, contact the Forest Resources Division, Michigan Department of Natural Resources, P.O. Box 30452, Lansing, MI 48909-7952.

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MANAGEMENT REVIEW TEAM

Forest Resources Division (FRD)
David Price– Forest Planning and Operations Section Manager
Heather Shaw – Forest Conservation and Certification Coordinator
Scott Lakosky – EUP District Supervisor
Tom Seablom – WUP District Supervisor
Cody Stevens - ELP District Supervisor
Ashley Autenrieth – WLP District Supervisor

Wildlife Division (WD)
Dave Lemmien – UP Regional Supervisor
Brian Mastenbrook – NLP Regional Supervisor

Fisheries Division (FD)
Darren Kramer - Northern Lake Michigan Management Unit Manager

Parks and Recreation Division (PRD)
Rich Hill - Gaylord District Supervisor

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EXECUTIVE SUMMARY

The purpose of the Management Review is to evaluate audit results and recommend solutions where warranted, to recommend revisions to the work instructions and recommend management actions that contribute to the continual improvement of forest management in the State of Michigan.

There are three types of certification audits:

1. External surveillance and recertification audits that evaluate the Michigan Department of Natural Resources (MDNR), forest management program against the Forest Stewardship Council® (FSC®) and Sustainable Forestry Initiative® (SFI®) forest management standards.
2. Internal audits that evaluate forest management activities in each Forest Management Unit (FMU) for conformance to MDNR forest certification work instructions.
3. Internal theme audits that look for conformance to one or more work instructions across all FMUs.

A summary of findings from recent audits follows:

- The two Minor Corrective Action Requests (CARs) from the 2022 external surveillance audit were closed during the 2023 surveillance audit.

- The 2023 external surveillance audit focused on the western half of the Sault Ste. Marie, Grayling and Roscommon FMUs and resulted in one minor FSC CAR; and the SFI audit resulted in no new findings.

- There are thirteen older internal audit and theme audit minor non-conformances that remain open.

- The 2024 internal audits will focus on the Baraga, Cadillac, and Atlanta FMUs.

- The 2024 external surveillance audit will be on the Shingleton, Gladwin and Gaylord FMUs and is scheduled for the week of October 14, 2024.

SECTION I. BACKGROUND

Michigan's state forest was dual certified in 2005 by SFI and FSC. Each of these certification systems comes with a set of forest management standards to which the state forest management system is expected to conform, and both standards encourage continual improvement of the forest management system.

The SFI Principle 12 Objective 17 addresses the need for continual improvement and the requirement for an annual management review.

The FSC standard does not explicitly address the concept of 'continual improvement', but it is implied through Principle 8: Monitoring and Assessment, where monitoring is used to achieve continued improvement.

Management Review Process

The Michigan Department of Natural Resources (MDNR) Forest Certification Work Instruction (WI) 1.2 establishes both the management review team and the management review. The review is a systematic process to evaluate forest management practices and to promote continual improvement in the management of the state forest system. The present review is based on the results of the internal and external audits and includes:

1. A report of the disposition of 2022 audit results.
2. An evaluation of 2023 audit results.
3. A report of actions immediately taken to address new audit findings.
4. Identification of pending actions needed to address new audit findings.
5. An assessment of the effectiveness of work instructions.

Focus of Management Review Meeting

Discuss and make management decisions to:

1. Address any SFI and FSC corrective action requests (CARs) and assign responsibility for actions to address findings.
2. Address unresolved non-conformance reports (NCRs) from past internal audits; develop strategies to resolve them and assign responsibility for actions to address findings.
3. Address pending actions proposed at previous management reviews that are not fully implemented.
4. Identify needed revisions to work instructions; and
5. Identify other actions for continual improvement of state forest operations.

Recommended Timeline for Review of Management Review Report

1. The Forest Certification Coordinator produced a draft management review report for the management review meeting that was held in St. Ignace on March 29, 2024.
2. The Management Review Team will agree on a draft Management Review Report and identify any needed work instruction revisions at the management review meeting. The draft report will be forwarded through the Management Review Team to the Forest Resources Division, Wildlife Division, Fisheries Division, Law Enforcement Division and Parks & Recreation Division management teams for comment by May 30, 2024.
3. Management Team comments on the draft report and list of needed work instruction revisions are due on June 28, 2024, to the Forest Certification Coordinator, who will prepare a final draft of the report.
4. The Forest Certification Coordinator will send the final draft management review report and the list of revised work instructions to the Resource Bureau Management Team for approval on July 16, 2024.

Implementing Program Improvements

1. Whenever possible, immediate changes will be made to remedy identified non-conformances.
2. The Management Review Team will be responsible for recommending actions necessary to improve sustainable management of forest resources.
3. Division management teams will review recommended actions specifically regarding impact upon program and field operations.
4. The Resource Bureau Management Team will review and approve management review decisions that identify changes and improvements necessary at all MDNR levels to continually improve conformance with work instructions and standards.
5. Division chiefs will ensure changes and improvements approved by the Resource Bureau Management Team are implemented via delegation to the appropriate manager.

SECTION II. STATUS OF PREVIOUS AUDIT RESULTS FROM 2022 MANAGEMENT REVIEW REPORT

This section provides status including disposition or extension of open findings from previous external audit and internal audits and actions identified in the previous Management Review Report. Details regarding the disposition of audit findings may be found in the published reports summarizing the 2022 external audit.

External Audit Findings

Open findings from the 2022 surveillance audit were addressed, reviewed, and closed during the 2023 surveillance audit.

In response to SFI 2022.1 and FSC 2022.1 to address invasive species training opportunities the following actions were taken: In 2023 (and on-going annually), 2 trainings were provided to MDNR staff (2 virtual, 4 in the field). The virtual trainings were 3 to 5 hours long and met the standards of eligibility to offer State of Michigan pesticide re-certification credits to attendees. The difference in length of the virtual trainings is to provide basic training for all and a chance for in-depth training for those with greater interested and/or need; the longer session included time for discussion and information sharing between participants. Attending at least one virtual training was mandatory for Forest Resources Division Unit managers, Foresters, Fire Supervisors, Fire Officers, Forest Techs, Inventory/Planning specialists, land use specialists, GNA specialists, Fire Specialists, and Wildlife Division Wildlife Biologists, Wildlife Techs, Wildlife Assistants, Supervisors, and Field Operations Managers. The training was also recommended for Wildlife Division Analyst positions, Parks and Recreation Division stewardship rangers, trails, and other field staff. All other MDNR staff were welcome to attend the virtual training if interested. Virtual Course Objectives included: 1) Understand invasive species threats in Michigan, including identification. 2) Understand best practices for prevention and control, including Integrated Pest Management (IPM) with special focus on best practices and minimizing pesticide use, 3) Understand invasive species prioritization state-wide, and how to apply it to your area. 4) Provide input to improve future invasive species trainings and inform learning resource needs.

Additionally, Forest Health staff provided additional training at both Forest Resources Division and Wildlife Division annual all-staff professional development meetings. Throughout 2023 and on-going, Forest Health staff have prioritized one-on-one opportunities with foresters in the field as issues arise, as well as presentations during pre-inventory meetings. Forest Health staff also regularly answer questions from foresters about forest health issues and their management, encouraging them to reach out when they see something unusual or have questions about managing forest health issues. This has been helpful to ensure that concepts covered in trainings are incorporated at the point where decisions are made.

In response to SFI 2022.2 and FSC 2022.2 and to resolve on-going DFC discussions and modeling for the new State Forest Management Plan (SFMP), MDNR conducted additional analysis of state forest inventory to quantify the extent of natural origin red and white pine on state forests, evaluate protection status and determine management intent and direction, and provide updated silvicultural guidance for management of natural red and white pine to field staff. Interim Guidance for interim guidance on management of natural red pine, natural white pine, and natural mixed pine stands on state forest lands was issued August 30, 2023. A workgroup has been formed and is writing silvicultural guidance for management of natural pine.

Internal Audit Findings

There are no open non-conformances from any internal audits prior to 2016. Recommended actions on the following internal audit findings have been completed and the findings have been closed:

- OFI 63-2015-01 concerned work instructions lacking guidance on invasive species management; especially management practices related to early detection, rapid response, and decontamination. The following actions have been taken:
    - Work Instruction 2.3 has been modified to provide additional guidance on invasive species detection and rapid response. Decontamination is already adequately addressed in the work instruction.
    - Additional resources have been developed and/or acquired to support staff on invasive species issues. Examples include:
        - Forest health program capacity has been increased by hiring four full time employees to help open communication from field staff to forest health specialists to help better address forest health issues along prevention, response and management plans including invasive species.
        - Physical copies of Invasive species identification field guides were distributed to attendees of the field trainings and smartphone-based identification apps (e.g., Seek by iNaturalist) were highlighted as valuable tools.
        - An invasive species treatment prioritization model and GIS viewer was developed by Michigan Natural Features Inventory and attendees of the virtual trainings were instructed on how to access/use it to aid management decisions.
        - Forest health staff developed guidance and an array of options and trade-offs to support decision-making regarding the prevention and management of Oak Wilt.
        - Contact information for local CISMAs by FMU and internal points of contact for establishing formal agreements with CISMAs has been established and highlighted as part of the invasive species trainings. Guidance (including examples) on working with CISMA partners was also a topic covered. Additionally, CISMAs have been leveraged (via state grant program) to assist in training producers through SFI trainings.
    - The QOL Invasive Species Decontamination Policy and guidance update process will be completed by end of Q3 FY2024. Incorporating invasive species decontamination language into timber sale contracts was a component of the old policy and remains part of the updated policy.
- NCR 71-2016-05 from 2016 theme audit of Work Instruction 2.2 concerned streamlining and improving the process for tracking the application of chemicals on state forest land. Focus is on centralizing PAPs and PUERs and Chemical Use Reporting. Excel spreadsheets in Teams were developed to track PAPs and PUERs. A more structured chemical use reporting requirement of contractors and other MDNR resource divisions provides the annual summary of pesticide use.
- NCR 12-2017-02 cited Work Instruction 1.4 and concerned inconsistencies in many State Wildlife Management Areas and whether they were appropriately included as In-scope or Out-of-scope for forest certification purposes. Changes were made to the definition of excluded lands in WI 1.1 provide resolution to this issue.
- NCR 72-2017-06 and NCR 12-2017-09 cited Work Instruction 8.1 and were related to a lack of familiarity with training needs, training plans and inconsistencies between official and unofficial training records, and incomplete documentation of training needs for unit staff. The FRD has completed transition to Michigan Learning Center. All trainings required in Training by Position Guide are tracked in Michigan Learning Center. The FRD has developed a process as part of MLC for reporting and tracking one-off training and will implement with FRD in 2024.
- Minor NCR 45-2019-02 cited Work Instruction 5.1 and concerned an undocumented experimental harvest treatment. A new site condition (5G: Research Study) has been established to document in MiFI state forest stands that are part of a formal research project and/or are being monitored as part of an experimental plan or treatment. Work Instruction 5.1 has been updated to require use of this site condition to document such research. Staff training is scheduled for October 2024 when the new version of MiFI is moved into production.
- OFI 33-1 concerned an instance where an archaeological/historical site was known and protected based upon SHPO recommendations, yet there were no records of the occurrence in MiFI. WI 9.1 has

been revised to reflect that cultural heritage records are maintained in the Michigan Forest Inventory (MiFI) spatial database and DNR's GIS Portal: Conservation Area Review Application.
- NCR 52-2022-2 where access roads from the west into the Hilly Mix timber sale (52-001-22; T31N, R05W, Sec 3 – N1/2) did not meet BMP standards and deficiencies included severe rutting, gulley erosion and no crown on the road, repairs have been made. The timber sale was eventually opened after the purchaser dressed up the road, brought in gravel and re-shaped. The MDNR will continue to monitor after contract is closed. If road repairs do not hold, staff will address.

Thirteen findings from internal audits during the period of 2017 to 2022 remain open and are discussed further in Section V.

SECTION III. SUMMARY OF 2023 AUDIT RESULTS

Results of the 2023 internal and external audits are discussed below. Actions to address the new findings are outlined in Section V.

2023 External Audit Findings

The 2023 external audit was a surveillance audit for both standards and was carried out from October 9-12, 2023, by Kyle Meister (SFI) and Dave Wager (FSC) on the west Sault Ste. Marie, Grayling, and Roscommon FMUs. The FSC audit resulted in one new minor CAR; and the SFI audit resulted in no new findings. All findings from the 2022 external audit were closed.

2023 Internal Audit Findings

Internal audits were not conducted in 2023 due to lack of capacity from acting assignments.

SECTION IV. IMPLEMENTED ACTIONS TO ADDRESS 2023 AUDIT FINDINGS

Following the external and internal audits, there is a concerted effort to expeditiously address and close each of the CARs, non-conformances, observations, and opportunities for improvement. There are no actions that have already been implemented to address 2023 audit findings.

The FSC Minor CAR 2023.1 remains open and is discussed in Section V.

SECTION V. PENDING ACTIONS TO ADDRESS AUDIT FINDINGS

The content of this section drives the main discussions at the management review meeting, as it requires the identification of recommended actions to resolve audit findings and the assignment of a manager responsible for implementation. The section is organized by work instruction group.

Work Instruction Group 1: Plan, Monitor and Review

1.1 Strategic Framework

- **Due Date:** September 30, 2023.

1.2 Management Review Process

- OFI MU 45-53-2019-01: While Burn Reports for prescribed fire are required (per Policy and Procedure 33.42-08 – Prescribed Fire Use) and provide details of the prescribed fire, follow-up monitoring of the effects is rarely being done. There is no policy or guideline for specific follow-up monitoring to assess the success, failure, or degree of either with respect to the burn objective(s).
  - **Discussion Points**: Without monitoring, there is no way to determine why a fire was successful or a failure resulting in an inability to improve forest management. Adaptive management is not possible. [2023] FRD is moving/has filled a new prescribed burn specialist position which should add capacity to address this issue. [2024] Prescribed fire specialist has been hired. No other progress on this finding.
  - **Recommend Decision**: Work to apply improved objective development and structured follow-up/monitoring process to prescribed burns. Possible topics include prescribed burn effectiveness on control of invasives and regeneration of red pine and/or oak.
  - **Responsible Manager**: Jeff Courser, Glenn Palmgren, UP Fire Management Specialist
  - **Due Date**: December 31, 2024.

- The 2018 Theme Audit focused on two specific areas in need of evaluation - governance including teams and team membership and internal audit format and focus. The audit was based on interviewing three categories of staff with a separate but similar set of questions for each group.
    - **Discussion Points**: The audit resulted in several recommendations that could be implemented immediately, as well as some that will need further discussion and a recommended course of action from the Resource Bureau before proceeding. [2024] Have completed proposed northern hardwood gap guidance memo, which addresses regeneration effectiveness monitoring.
    - **Recommend Decision**: The Resource Bureau approved changes to the FCT, the Internal Audit process and structure, and associated changes to the Work Instructions have been implemented. The recommendations on restructuring the Management Review Team and implementation of Effectiveness Monitoring, including the identification of monitoring topics and the creation of an Effectiveness Monitoring Feasibility Team, and subsequent Work Instruction changes, are awaiting review by Resource Bureau. [2022] An effectiveness monitoring team will be created to begin implementation of monitoring to supplement the northern hardwoods research project. [2024] Form and task the effectiveness monitoring team to evaluate and make recommendations to divisions for implementation of effectiveness monitoring into DNR program areas.
    - **Responsible Manager**: David Price, Planning and Operations Section.
    - **Due Date**: September 30, 2024.

1.3 Regional State Forest Management Plan Implementation and Review

- **Discussion Points:** No issues identified for discussion.

1.4 Biodiversity Management

- Disagreement between what is represented in the Cold-Water Lakes and Streams SCA layer and local knowledge of Fisheries Division (FD) staff has been discussed in detail resulting in the identification of varying understanding of cold-water/high priority trout streams and the application of buffers.
- OFI 45-2019-01: Access to accurate aquatic information including lake and river classification and regulatory and protection status has been a consistent challenge on state forest lands (see 2019 Management Review Report). Fisheries Division's Institute for Fisheries Research developed the Aquatic Habitat Viewer, an ArcGIS Online application useful for accessing accurate aquatic information. However, the tool currently has restricted access and is only available to Fisheries Division staff.
    - **Discussion Points**: SCA layer should clearly identify areas where FRD field staff need to engage with Fisheries Division staff on proposed treatments or project planning. Further discussion with SCA/HCVA committee also identified the broader need for similar clarification of areas of co-management with PRD (e.g., rail trail corridors and State Forest campgrounds).
    - **Recommended Decision**: Reinforce Fisheries Division's ability to provide expertise and engage in state forest decision-making. Correct cold-water and high priority trout stream representations in Enterprise GIS based on accurate sources including the Institute of Fisheries Research AGO app. [2022] Work with Resource Assessment Section (RAS) and FD staff to replace Cold Water Streams and Lakes layer with appropriate Institute of Fisheries Research – Data Viewer layer. Isolate to cold and cold transition. FD can help with cut offs. RAS can determine if we need to host or can point to outside sources. [2024] Have new data on coldwater streams and lakes, but still need to update the SCA. In 2025, MDNR will revise MDNR PP Inventory and Compartment Review to update processes for effective multi-divisional input for proposed management treatments.
    - **Responsible Manager**: John Spitzley, Manager, RAS, David Price, Manager, FPS.
    - **Due Date**: September 30, 2024.
- OFI: MU-3, WI 1.4: Opportunity to clarify requirements associated with wildlife habitat justification for treatments on purchased lands. There is a need to clarify basis for justification requirement and scope of application. In addition, there is inconsistency in restrictions being applied to purchased lands, i.e., chemical use restrictions (request for no use on state forest purchased lands while use occurs in SWMAs).
    - **Discussion Points:** It is important to provide descriptions of benefits to wildlife for treatments on "purchased lands" for both federal and requirements and to satisfy stakeholder interests. There are multiple ways to report on treatment benefits to wildlife. A good solution may be to include

"purchased lands" management guide reoccurring analysis and reports on benefits of treatments on purchased lands as part of the SFMP revision. (2023) FRD, WLD and PRD assistant chiefs have met to develop a problem scoping doc and propose a path to resolution. [2024] OPL is coordinating the next USFWS audit of purchased lands.
    - **Recommended Decision:** [2024] Add language to MDNR PP 32.22-15 State Forest Inventory and Compartment review to require documentation of how treatments on purchased lands primarily benefit wildlife species.
    - **Responsible Manager:** Jason Stephens, FRD Assistant, David Price, Manager, FPO Section.
    - **Due Date:** December 31, 2025.
- OFI 52-1, WI 1.4: On several occasions, appropriate rare species mitigation measures were considered and reflected in treatments, yet there were no records or documentation of rare species review.
    - **Discussion Points:** Consistently capturing environmental review decisions and associated rare species mitigation measures has historically been a challenge. Printouts in compartment files or notes in stand or treatment comments have been used with varying effectiveness. (2023) RAS needs to complete a Survey 123 that will facilitate mitigation decision-making process but has lacked capacity in 2023 to complete work.
    - Table revisions need to be complete consistent with 2023 update of T&E species list.
    - **Recommended Decision:** Recognizing this challenge, a department team with the assistance of MNFI, has been working to develop a Rare Species Review Tool, which is a standalone app and database built within a GIS environmental. The tool is intended track rare species review and assist with decision-making for mitigating the potential impacts on rare species of proposed forest treatment and other state forest project development. [2024] Rare species review app is almost ready for implementation.
    - **Responsible Manager:** David Price, FPO Section Supervisor and Amy Derosier, Planning and Adaptation Section Supervisor
    - **Due Date:** September 30, 2024.

1.5 Social Impact and Public Participation

- **Discussion Points:** No issues identified for discussion.

1.6 Management Unit Analysis

- **Discussion Points:** No issues identified for discussion.

Work Instruction Group 2: Forest Regeneration and Chemical Use

2.1 Reforestation

- Minor NCR 73-45-2019-01: Failure to identify potential natural regen problems prior to harvest and staff not consistently following natural regen evaluation requirements.
- NCR 33-2022-01: Department guidance lacks a clear definition of forest productivity and no way to clearly describe successful natural regeneration of forest stands within first 10 years after harvest. In some instances, natural regeneration harvests are being prescribed without clearly defining specific and expected regeneration outcomes. Stand management objective is often being described very broadly, i.e., any combination of tree species currently on site without target stocking densities. Field evidence suggests inconsistent application of quantitative natural regen surveys and when conducted, results are not captured except in stand comments. In addition, staff are not documenting clear, site-specific environmental or forest health considerations when successful natural regeneration exceeds 5 years since timber sale completion. Finally, the Work Instructions lack a clear definition of forest productivity, e.g., maintenance of stand forest volume and/or species diversity across rotations at a given point in time and/or capturing adequate stocking of desirable species to meet values identified in forest management plan.
    - **Discussion Points:** [2019] Examples illustrate a lack of understanding on specific guidance related to difficult to regenerate stands and demonstrate that current regeneration guidance may be unclear or that more training may be required. [2022] New Forester Training is tentatively scheduled for October 2023 and will include regeneration monitoring. In addition, MDNR continues to support collaborative research to better understand methods and measure for successful regeneration of northern hardwoods and cedar-dominated lowland conifers. [2023]

Theme audit was not conducted due to acting assignments. Completed proposed northern hardwood gap guidance memo, which addresses regeneration effectiveness monitoring. Conducted new forester training in December 2023. Monitoring of Walters-Roloff northern hardwood research continued in 2023. Scoping use of Mobile Map and Inventory Manager to conduct regeneration surveys. [2024] Hiring a reforestation specialist which will increase ability of silviculturist to address this issue. NH gap guidance memo has been approved by the FRD MT and distributed to field staff. Incorporation of planted and natural regen survey data collection into MM and IM is in progress.

- **Recommended Decision:** [2019] Conduct additional training and develop additional communication on updated regeneration guidance. [2022] Continue to support collaborative research on difficult to regenerate cover types. Conduct theme audit in 2023 on difficult to regenerate stands (not conducted due to acting assignments). Complete incorporation of planted and natural regen survey data collection into MM and IM. Recommend initial implementation focus of natural regen surveys in natural pine and oak regen in the NLP.
- **Responsible Manager:** David Price, FPO Section Supervisor, Jason Hartman, State Silviculturist
- **Due Date:** December 31, 2024.

2.2 Use of Pesticides and Other Chemicals

- OFI: MU-2, WI 2.2: There are no clear thresholds for determining when a site prep spray is required prior to planting. Our current system places burden on the District Timber Management Specialist (TMS) to make a qualitative evaluation which may be leading to a default decision to spray. Conversely, release sprays have clearer criteria, i.e., Free to Grow measurements.
  - **Discussion Points:** The effectiveness of varying red pine site prep and release techniques were evaluated 2022. The MDNR should assume that all previously forested stands will require competition control for establishment of red pine. Determining site prep vs. release treatment decisions will require earlier development of PAPs and PAPs should initially be developed by the treatment sponsor who has the most knowledge of the site.
  - **Recommended Decision:** Guidance should be updated to state that it is the MDNR's expectation that all red pine artificial regeneration will require competition control, either site prep or release treatments. Work Instruction should be revised to require earlier development of PAPs, initiated by the treatment sponsor once the treatment is scheduled. (2023) Completed WI 2.2 revision as recommended, recommend closure. [2024] Guidance for pine management should be updated to provide criteria for competition for determining when a site prep spray is needed.
  - **Responsible Manager:** David Price, FPO Section Supervisor
  - **Due Date:** September 30, 2024.

2.3 Integrated Pest Management and Forest Health

- OFI: MU-1, WI: 2.3: Documented examples that highlighted an opportunity to revisit and clarify forest health guidance related to oak wilt, Beech Bark Disease (BBD), and Emerald Ash Borer (EAB). Staff have varying expectations about different forest health-related treatment outcomes leading a wide range of applications of harvest specifications and next step treatments.
  - **Discussion Points:** MDNR must ensure that forestry staff demonstrate knowledge, and take appropriate action where feasible, to limit the introduction, spread and impact of invasive species that directly threaten native plant and animal communities.
  - **Recommended Decision:** MDNR will provide invasive species and forest health training for staff starting in FY23 and continuing an annual basis. Training will be mandatory for field staff involved in forest management decisions including Wildlife Biologists and Technicians, Foresters and Forest Techs, Parks and Rec Staff working on state forest trails and campgrounds, and Field Specialists. Training will include regional priority species education modules; discussion of resources, tools, and management implications; and a growing season field day. In addition, staff will be made aware of and encouraged to participate in local Cooperative Invasive Species Management Area trainings. Finally, forest health guidance for management of red oak, American beech and ash will be reviewed and updated as appropriate. [2024] Training for SFI and FSC findings has been completed but a review and update of forest health guidance for management of red oak, American beech and ash remains to be completed.

- **Responsible Manager:** David Price, Planning and Operations Section and Sue Tangora, Forest Health Section.
- **Due Date:** September 30, 2024.

- NCR 52-2022-01: A sizeable population of invasive Japanese knotweed was identified during the audit in an active timber sale landing. Additional specimens were identified along the access roads into the sale. The timber sale administrator was unaware of the occurrence and the location was undocumented.
  - **Discussion Points:** The occurrence was described as Bohemian/hybrid knotweed which has the potential to spread by seed but is primarily spread by the movement of plant fragments which can re-establish. While the occurrence was sizeable, local staff were unaware of the occurrence and the location was undocumented. On site discussion with Invasive Species staff recommend closing access to the area immediately to prevent further spread of the species. Additionally, consideration should be given to treating the adjacent small occurrences along forest roads. Treatment of the entire occurrence would likely require outside funding, multiple annual treatments for a minimum of 3-5 years and monitoring for an additional 3-5 years.
  - **Recommended Decision:** Invasives species specialist will work with the local unit to report site in MISIN and contain the site with barriers and forest road closure. Local staff will participate in mandatory invasive species training. (2023) By the time field staff discussed treatment, it was too late in the growing season. [2024] PAP is in draft. The CAKE CISMA is willing to treat the site. Working on that agreement. Some work was done this winter to knock down the old stems.
  - **Responsible Manager:** Lucas Merrick, Gaylord Forest Management Unit Manager, Cody Stevens, NELP District Manager, Sue Tangora, Forest Health and Cooperative Programs Section Supervisor
  - **Due Date:** September 30, 2024.

Work Instruction Group 3: Best Management Practices

3.1 Forest Operations

- NCR 71-2016-05 cited Work Instruction 3.1 and concerned an oil well lease that was “out-of-compliance” with the conditions of the lease and with EGLE requirements. This non-conformance will be held open to provide time for the operator of the well site to carry out the necessary actions to bring the operation into full compliance.
  - **Discussion Points:** [2016] This non-conformance identified a host of issues with well sites in the area and resulted in a meeting between EGLE and DNR staff to iron out differences and form a plan to move forward to clean-up. The lessee has been conducting the necessary fixes to bring the operation into conformance with EGLE and DNR requirements. [2020] Minerals Management requested an AGO opinion on March 2, 2020, to determine liability of the lessee for site clean-up, which remains pending. [2022] Non-conformances continue to be documented on site. [2024] No progress has been made to date to resolve non-conformances due to vacancies in the Roscommon UM and statewide land use specialist positions and a request for AGO opinion regarding the responsible party. An AGO opinion has been received that identifies the lessee as the responsible party. Next step is to send a communication to the lessee specifying requirements and deadline for site remediation.
  - **Recommended Decision:** [2016] Allow unit staff to continue to work with lessee to ensure that compliance is gained. [2022] Local staff will work with Land Use Specialist and EGLE to resolve issues. [2024] Make inquiry with DNR Exec and AGO regarding 2020 request for AGO opinion before DNR can proceed with any enforcement action.
  - **Responsible Manager:** Matt Fry, Minerals Management Section Manager; Ashley Autenrieth, FRD WLP District Supervisor; Jason Lewicki, Roscommon FMU Unit Manager.
  - **Due Date:** December 31, 2024.

3.2 Best Management Practices

- Minor NCR 73-45-53-2019-02: The goal of forestry Best Management Practices is to minimize the effect of non-point source (NPS) pollution caused by logging. NPS pollution is caused by the conveyance of mineral or organic sediment, nutrients, chemicals, heat or debris into ground or surface water, or otherwise damage streams, lakes, and wetlands. Forestry Best Management Practices also seek to maintain forest productivity during logging by minimizing soil rutting and compaction. Resource Damage Reports are intended to capture instances of non-conformance to forestry Best Management Practices.

Staff continue to demonstrate confusion over the definition of Best Management Practices non-conformances (Resource Damage Reports). In additions, staff report challenges with the current reporting format and database.

- **Discussion Points:** There are 2 points: 1) what constitutes reportable resource damage; and 2) problems with the current database. There are other activities beyond forestry that can create NPS and loss of soil productivity like ORVs. (2023) Began discussion of creating a new RDR database, but no progress made due to RAS staffing shortage. [2024] No progress made on new RDR system in 2023 due to RAS staffing shortages.
- **Recommended Decision:** Clarify definitions on what constitutes an RDR, e.g., Handbook of examples; update/Revise RDR database (building upon culvert app may be an efficient option). [2022] Re-enforce existing system through training for staff. Management team to discuss development of team to evaluate existing system and revision process as necessary.
- **Responsible Manager:** John Spitzley, Manager RAS, David Price, FPO Section Supervisor
- **Due Date:** December 31, 2024.

3.3 Road Closures

- **Discussion Points**: No issues identified for discussion.

Work Instruction Group 5: Research

5.1 Coordinated Natural Resource Management Research

- **Discussion Points**: No issues identified for discussion.

Work Instruction Group 6: Recreation and Education

6.1 Implementing Public Information and Educational Opportunities

- **Discussion Points**: No issues identified for discussion.

6.2 Integrating Public Recreational Opportunities with Management

- **Discussion Points**: No issues identified for discussion.

6.3 Sustainable Forestry Initiative Involvement and the Implementation Committee

- **Discussion Points**: No issues identified for discussion.

Work Instruction Group 7: Integrated Implementation and Contracting

7.1 Timber Sale Preparation and Administration Procedures

- FSC Minor CAR 2023.1: Indicator 4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements. Finding language: Based on a review of stumps and discussions with MDNR staff improper felling techniques occurred at timber harvest Scrams Creek Mix Compartment 45201 (Soo Area) and Lockdown Jack Compartment 51 (Roscommon Area). Trees were felled using only slant cuts without hinges.
  - **Discussion Points**: Enforcement of felling techniques is enforced by MIOSHA, not MDNR. Foresters are not qualified to enforce, nor should they enforce MIOSHA requirements. Conformance to MIOSHA is a general timber sale spec.
  - **Recommended Decision:** Add to Timber Sale Inspection form (R-4050) for discussion at pre-sale meeting that producer must abide by all MIOSHA requirements during conduct of timber harvest operations.
  - **Responsible Manager:** David Price
  - **Due Date:** September 30, 2024

7.2 Legal Compliance and Administration of Contracts

- **Discussion Points**: No issues identified for discussion.

Work Instruction Group 8: Training

8.1 Staff Training for State Forest Management

- **Discussion Points**: No issues identified for discussion.

Work Instruction Group 9: Tribal

9.1 Collaboration with Tribes Regarding Management of State Forest Land

- **Discussion Points**: No issues identified for discussion.

SECTION VI ASSESSMENT OF THE EFFECTIVENESS OF WORK INSTRUCTIONS

The implementation of forest management and operations on the Michigan state forest is governed by a suite of 20 work instructions that are divided into eight categories. Internal audits assess management and operations against the requirements of all work instructions. External audits assess management and operations against the indicators in the two certification standards which are aligned with the work instructions.

SECTION VII 2024 AUDIT SCHEDULE AND TRAINING

Internal Audits

Internal theme audits focused on WI 3.1 Event and Non-Event Permits, WI 3.2 BMP/Road Maintenance, and 3.3 Emergency and Non-Emergency Road Closures will be conducted in the Baraga (July 16), Cadillac (July 9) and Atlanta (July 10) FMUs.

External Audits

The 2024 Forest Stewardship Council and Sustainable Forestry Initiative audit will be a surveillance audit scheduled for the week of October 14 on the Shingleton, Gladwin and Gaylord FMUs.

Training

Full forest certification training will be offered in summer (late July or August). Pre-external audit training will be held with the Shingleton, Gladwin and Gaylord FMU staff in early October.