

# Michigan Department of Natural Resources

## Management Review Report

January 17, 2008

# DNR Management Review Field Meeting

January 17, 2008

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### Attendees:

FMFM Assistant Division Chief: Donna LaCourt  
Field Coordinators FMFM: Mike Paluda & Bill O’Neill,  
WLD: Penney Melchoir  
UP and NLP District Supervisors for FMFM: Roger Hoeksema, Debbie Begalle  
WLD: Rex Ainsle, Glen Matthews, Larry Visser ,Tim Reis  
LED: Acting Assistant Chief Capt. Tom Courchaine, Acting Field Coordinator Lt. David Davis,  
Lt. John Cischke  
PRB Representative: Gary Ellenwood  
Others: FMFM Forest Resource Management Section Leader Cara Boucher,  
Forest Certification Specialist Dennis Nezich,  
Forest Planning and Operations Unit Manager Larry Pedersen,  
Forest Certification Planner David Price

# I Background

## A. SFIS Objective for Management Review and Continual Improvement

**Objective 13.** To promote continual improvement in the practice of *sustainable forestry* and monitor, measure, and report performance in achieving the commitment to *sustainable forestry*.

**Performance Measure 13.1.** *Program Participants* shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in *programs*, and to inform their employees of changes.

### **Purpose of Management Review Meeting:**

Make management decisions to implement in upcoming year to do the following:

- a. Clear the SFI and FSC Corrective Action Requests (CARs) and implement DNR corrective action responses.
- b. Clear Statewide internal audit non-conformances identified in internal audits.
- c. Review pending actions decided at previous Management Review and not fully implemented.
- d. Identify related additional actions for continual improvement in management.
- e. Identify needed revisions to work instructions.

### **Background Information and Comments on Performance during previous year:**

In 2004, as part of a strategy to retain forest-based jobs and assure forest sustainability, Governor Jennifer M. Granholm directed the DNR to pursue certification. In May 2004, the Legislature passed the Sustainable Forestry Act that requires forest certification of the 3.9 million acres of the state forest system. Michigan's state forest system was accredited in December 2005 under two forest certification standards that promote long-term sustainable forest management, the Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC). An annual SFI and FSC surveillance audit is required to maintain certification status.

"Forest certification is a continuous improvement system so there are always new challenges and opportunities to improve. It is clear to me that we will continue to meet the challenges that arise," said DNR Director Rebecca A. Humphries. "Every DNR employee works hard to conserve, protect and manage the resources that have been entrusted to us. Achieving and maintaining dual forest certification underscores our dedication to natural resources and citizens."

In 2007, a SFI and FSC joint surveillance audit was conducted in October. The audit was originally scheduled for October 2 through 5, but later was rescheduled for October 30 through November 2 due to a Michigan budget crisis. In addition, four DNR internal audits were conducted throughout the summer as part of the DNR Management Review process.

### **DNR Internal Audits:**

In compliance with Work Instruction 1.2, four internal audits were conducted in 2007. The Forest Management Units audited included: Sault Ste. Marie, Gladwin, Traverse City, and Roscommon. Based upon audit results, DNR lead auditors identified five "statewide" non-conformances (see Appendix B) that require focused attention during the 2007 Management Review.

### **Second Annual Surveillance Audit (October 2007):**

The second annual surveillance audit for the maintenance of Michigan's forest certification was conducted in the Northern Lower Peninsula between October 30 and November 1, 2007, with a visit to Lansing for

staff interviews on November 2, the final day of the audit. This audit was conducted by Mr. Mike Ferrucci, representing SFI and Mr. Robert Hrubes representing FSC.

### General Overview

The audit began with opening presentations to address the 2006 Corrective Action Requests (CARs) at the Traverse City OSC on Tuesday, October 30th. Auditors were provided with a status of the action plans for addressing each of the 7 SFI and FSC CARs plus an update on the tribal consent decree. The afternoon was spent visiting field sites in the Traverse City FMU.

Wednesday, October 31st started at the Cadillac Operations Service Center (OSC) where presentations were given on the District and Cadillac Forest Management Unit (FMU). The majority of the day was spent visiting various field sites in the Cadillac FMU. Auditors and DNR staff were together for the first segment of the field day but then split into two groups in the afternoon to cover additional sites.

Thursday, November 1st included attendance at a portion of the Roscommon FMU compartment review and a brief site visit close to the OSC. The afternoon was spent in the Gladwin FMU visiting field sites, after a brief presentation on the unit.

Many of the field visits during the week involved Off Road Vehicle (ORV) and Best Management Practice (BMP) sites (both damaged sites and restoration sites), active logging sites, and past timber sales. Two of the logging sites were active and the auditors had the opportunity to talk with operators/contractors.

Friday, November 2nd was spent at the Lansing office. The first two hours of the morning were used by auditors to address specific questions relating to the 2006 CARs, particularly: (1) statewide planning efforts, (2) public consultation efforts, (3) a review of the compartment review process, (4) BMP and road/trail damage issues, and (5) ORV task force recommendations. The last hour of the morning was the official closing briefing by each auditor for their specific program.

### SFI Closing Briefing

Mike Ferrucci (SFI Program Manager) conducted the audit for the SFI standards and concluded that Michigan remains under continuing conformance with the SFI standards. He commented that our internal audit and management review process is a very strong part of Michigan's program and is a highly functioning and excellent process that we should continue to implement. The department had 2 open CARs from the 2006 audit relating to rutting specifications and BMP/road/trail damage issues. The CAR regarding rutting will be closed and we were commended for a job well done regarding our action plan to address this issue. The CAR regarding BMPs/damage issues should be closed pending submission of some additional reports. Mike stated that most aspects of our corrective action plan were addressed and we have done a lot of good work on this issue; however, there is still much to do (an estimated 1700 additional Resource Damage Reports (RDR) sites remain and funding is uncertain). Therefore Mike requests (and later received) a progress summary, including data and trends for how we specifically addressed these sites.

One new minor non-conformance (CAR), two Opportunities for Improvements, and one concern were issued. The CAR involves the state forest plan, and the need to complete this plan. The previous statewide forest plan is dated 1983. The opportunities for improvement involve (1) the need for additional work on the analysis for cover type changes and compositional changes (habitat connectivity) and (2) timelines and the process for road closures, including Law Enforcement Division (LED) participation at compartment reviews. The concern expressed arose from the internal audit reports and also includes assurances that there is adequate funding for prescribed burns. This will be a theme for the 08 audit since "there is a lot of talent and knowledge in the department on prescribed burning and we need to utilize that as a tool to minimize chemical use." Mike commented that there are many areas where the department exceeds the

standards and this information will be spelled out more specifically in the final written report. Another theme for focus in the 08 audit will include the state forest involvement committee efforts.

### FSC Closing Briefing

Dr. Robert Hrubes (FSC lead) conducted the audit for the FSC standards and reaffirmed the award of certification and added that he was very confident in that decision. The department had five open CARs from the 2006 audit which involved (1) rutting standards, (2) stakeholder consultation specific to High Conservation Value Areas (HCVAs), (3) environmental analysis and documentation, (4) statewide and regional planning, and (5) stakeholder consultation processes. The CARs involving rutting and HCVA stakeholder consultation were both closed because provided evidence indicated that we were responsive to the issues, although materials provided for the stakeholder consultation for HCVAs weren't quite as comprehensive as some of the others. Dr. Hrubes made the statement that this is a difficult standard and because of that he felt that they could be more flexible in how the standard was applied and addressed. He also stated that he felt we still made good progress to address the issues under this CAR. The other 3 CARs will be closed for 2006, but new and more focused CARs under those topics will be issued for 2007. The environmental analysis CAR showed a good first step toward progress but the next CAR will involve a need to work with communication experts on a public document for this activity. The CAR on planning will be two-fold and will address the requirement to complete the statewide plan by the end of February 2008, plus develop a task-based schedule for the completion of the regional state forest plans by the end of 2008. The CAR regarding the general stakeholder consultation could have been elevated to a major non-conformance, but since we have been making progress a more focused minor CAR for 2007 will be issued.

In addition to the new CARs (or carry-over CARs) from 2006, one new minor non-conformance (CAR) will be issued regarding ORV damage. ORV issues are new on the radar screen for FSC and we should expect to see revised regional standards under FSC addressing this in the future. The CAR will focus on a need to develop the timeline and follow through on the outlined ORV management plan. In addition, two Opportunities for Improvement are being issued and include (1) LED presence at compartment reviews and (2) Director's Orders needing to be a readily available tool for road closures. Finally, one observation was made by Robert regarding the internal audit program. He agreed with Mike and stated that Michigan is on the cutting edge with this system (and unparalleled across the nation) and he feels this is a very important part of Michigan's forest certification program. Lastly, a theme for the 2008 audit will focus on a one-year status report of the tribal consent decree.

### **Focus in 2008:**

Forest certification is a continuous improvement system so there are always new challenges, new CARs, and opportunities to improve. Addressing the surveillance audit CARs, the five statewide non-conformances identified during the internal audits, and completing unfinished assignments from last year's management review will be the focus of the forest certification effort in 2008.

### **Management Review Process**

Work instruction 1.2 establishes the Management Review process for continual improvement in the management of our Forest Resources. The purpose of the Management Review is to establish a systematic process for gathering information regarding improvement in forest management practices. The review includes a report of the previous year's implementation efforts to management and a formal management review meeting. The annual management review will evaluate audit results for state forest operations, evaluate effectiveness of work instructions and non-conformances, and determine changes and improvements necessary for continued conformance.

**Implementing Program Improvements:**

1. Whenever possible, immediate changes will be made to remedy identified non-conformances.
2. The Forest Certification Implementation Team (FCIT) will be responsible for ongoing management review of implementation and for recommending actions necessary to improve sustainable management of forest resources.
3. Division Management Teams will review decisions.
4. The Statewide Council (SWC) will review and approve management review decisions that identify changes and improvements necessary at all Department levels to continually improve conformance with work instructions.
5. Division Chiefs will ensure changes and improvements approved by the Statewide Council are implemented via written communication to employees.

**Recommended time line for review of Management Review Report (MRR) and proposed Work Instruction (WI) revisions:**

- a) Field Coordinator Management Review Report sent to FMFM, WLD, FSHD, LED, and PRB Management Teams by Feb 15, 2008.
- b) Management Team comments on MRR due March 14, 2008 to Penney Melchoir who will review with the FCIT Executive Committee.
- c) Send MRR and proposed WI revisions to Statewide Council for approval by April 1, 2008, approval desired by May 8, 2008.
- d) FMFM and WLD District supervisors and Fisheries Division Unit Managers will ensure implementation of management review decisions following approval by SWC.

## Statewide non-conformances from 2007 internal audits (see Appendix C for internal audit process and Appendix B for statewide internal audit non-conformance reports)

Statewide Internal Audit (IA) non-conformances are defined as non-conformances that appear in the majority of the four internal audits conducted in 2007, and which lead auditors and the Forest Certification Specialist confirm as being widespread and systemic in nature. Local or unit-level non-conformances were isolated lapses of conformance with forest certification work instructions.

Non-conformance Reports (NCR) for the Statewide non-conformances were drafted by the Forest Certification Specialist in consultation with lead auditors. These NCRs identify root causes and propose corrective actions to clear these non-conformances. The FCIT reviewed these draft NCRs, and approved a final version for consideration by the Management Review Team (see Appendix B).

### Most significant Internal Audit non-conformances **bold** indicates statewide non-conformance

WI	# FMUs w/NCRs	
1.1	1	Staff not aware of operational mgt guidance document (note: now being replaced by the SFMP) or how it applies, incomplete knowledge of work instructions.
1.2	2	Delay in approval and roll out of management review decisions.
1.3	4	<b>Ecoregional plans significantly behind schedule. Inadequate involvement, communications, and/or understanding by field staff.</b>
1.4	4	Variable: <b>no annual report generated on HCVAs and ERAs (3), lack of comments in stand remarks re: conservation objectives (3)</b> , confusion on how to apply retention guidelines (1), unsure of how to request special surveys (2).
1.6	2	Pre-inventory meeting requires incorporation of broader natural resource information.
1.7	1	No evidence that an analysis was conducted of the need to update the forest trends report.
2.1	3	<b>Department policy for preparing and closing FTPs is unclear to staff (1)</b> , annual planting summary not submitted (2), inventory data not updated to reflect completed FTPs (2), FTP completion reports not prepared (1), missing complete set of signatures on FTP (1).
2.2	3	<b>Pesticide Use Evaluation Reports (PUER) not attached to FTP completion reports (3)</b> , public notification process not reviewed and approved (2), PAP prepared but not approved (1), <b>FTP completion report not prepared (3)</b> .
2.3	1	Lack of direction and guidance on controlling invasive plants, FMFM restoration guidelines include invasive plant recommendations.
3.1	4	<b>FTP or use permits not approved by all Divisions (2)</b> , spill kit missing on truck with auxiliary fuel tank (1), lack of a mechanism for notification of DNR regarding rehabilitation of well sites (1), lack of understanding of land management responsibilities for well sites from the 1940s and 50s where significant environmental issues exist (1).
3.2	2	Not all employees are consistently reporting observed resource damage (2). Staff confusion exists as to what constitutes reportable resource damage (1).
3.3	1	Failure to exercise road closure to address significant environmental issue.
5.1	4	<b>Updated research summary not published in timely manner (4)</b> , report lacks information that facilitates incorporation into DNR activities (1).
6.2	1	Site degradation and safety issues at dispersed camping sites.
7.1	4	Treatment did not match prescription (1), <b>Form R 4050 not utilized as outlined in work instruction (3)</b> , SFE trained supervisor not noted on inspection form (1), minor spills observed (2), excessive rutting observed (1),
7.2	2	Engineering services review not requested for culvert project (1), illegal activities not reported (1), lack of insurance coverage on event permit (1).
8.1	1	Individual training plans not completed.
9.1	1	Not all tribes were notified of compartment review open house.

**II. Decisions, direction, responsibility and time lines - FSC and SFI CARs and actions to clear these external CARs are in bold.** (MR#) indicates a decision made as part of an earlier Management Review which is not fully implemented:

**1. Remove select State Forest Land from scope:**

(Continuing from last year): An unresolved issue carried over from last year regards the Houghton Lake Wildlife Research Area (~11 thousand acres) and other related state game, wildlife, and research lands. It is unclear based upon the original certification process and certification documents whether all state game, wildlife, and research areas within State Forest boundaries are to be certified. The question is whether these purchased properties located within the state forest boundary are within the scope of certification and, if so, whether that jeopardizes federal aid agreements.

This issue is currently under review. The expectation is that the Department will clearly identify which specific properties acquired with federal funding are included and/or excluded in the scope of certification (MR07)

**2. Work Instructions:**

The FMFM Forest Certification Specialist will incorporate the following recommendations regarding changes to work instructions by February 15, 2008, forward to the FCIT for concurrence, and then forward to the Department Management Teams and SWC (by April 1) for review and approval.

WI	Recommendation for Revision or clarification of Work Instructions
1.1	Delete Section III – DNR Leadership Actions
1.2	None
1.3	This WI was revised October 25, 2007. An additional revision is requested by the Statewide Council. The current work instruction has a public review of section 1-4 of the draft plan which should be deleted. Include a statement to engage the public in the planning process prior to formulating the plan.
1.4	Insert a statement in the monitoring section that the DNR Monitoring Protocol Summary for Ecological Reference Areas and High Conservation Value Areas will be followed. Delete item #2 that currently requires an annual report on HCVA's following compartment review.
1.5	None
1.6	<ul style="list-style-type: none"> <li>Change the term “pre-inventory review” to “pre-inventory meeting”. Include a statement that this meeting is ideally a group meeting on the FMU involving all affected Divisions and programs.</li> <li>Include a statement that the pre-review (which is different from the pre-inventory meeting) is ideally a group meeting on the FMU involving all affected Divisions and program staff.</li> </ul>
1.7	None
2.1	None
2.2	No change to chemical list at this time, wait until completion of FSC chemical derogation process.
2.3	None
3.1	<ul style="list-style-type: none"> <li>Modify to state that documentation of completed FTPs will be kept in the compartment file, and forest inventory records will be updated annually.</li> <li>Define intrusive activity more concisely: An intrusive activity is a site disturbing activity impacting soil and/or vegetation that may potentially influence water quality, T&amp;E species, special sites</li> </ul>

	(cultural, ecological, geological, and historic), or site productivity. (Maintenance of Department roads within a cleared right of way (i.e. grading, culvert replacement, beaver dam removal, improvement of the existing road bed, removal of down trees or brush, and mowing of grass) is not considered intrusive by the Department.)
3.2	None
3.3	Modify item #2 under emergency road closure – require closure of road if hazard cannot be immediately mitigated
5.1	Identify the FMFM Forest Health, Inventory, and Monitoring Unit Manager (replacing the FC Planner) as being responsible for facilitating the review and timely update of the annual Research Report.
6.1	None
6.2	None
6.3	None
	<ul style="list-style-type: none"> <li>Revise Section II item 2 to include: A record of all timber sale inspections, site visits, and other related observations and notes will be kept on a Timber Sale Contract Field Inspection Report, R-4050. At a minimum, complete a form R-4050 (including checklist items) for each payment unit, or alternately, at each inspection (if multiple payment units were completed between inspections).</li> <li>Revise section II, item 3, to indicate: A summary final Timber Sale Inspection Report will be attached to the Timber Sale Contract Completion Report. All timber sale inspection reports will be kept as part of the timber sale record.</li> </ul>
7.1	<ul style="list-style-type: none"> <li>Address LED concerns in regard to PPE use in timber sale contract areas.</li> </ul>
7.2	None
8.1	None
9.1	None

**3. Management Review** (W.I. 1.2):

- 1) Internal Audit Procedures for 2008 are included in Appendix C (note that modification of the role of the Forest Certification Specialist and Lead Auditors are recommended as specified in steps 2-6 on page 29). It is recommended that the Department begin auditing one FMU in each of the FMFM Districts every year. However, the Western Lower Peninsula District will be skipped in 2008 due to the extensive amount of internal and external auditing that occurred in 2007. The FMUs to audit in 2008 include Baraga, east end of SSM, Gaylord, and Atlanta (substituted for an FMU in the Cadillac District).
- 2) Consider a proposal for restructuring of the FCIT:  
Change the name of the Forest Certification Implementation Team to Forest Certification Team (FCT). Investigate having Law Enforcement Division Involvement in the FCT. Have rotation of field staff on the FCT, with rotation of some positions to occur annually. The FCT Executive Committee will recommend changes to the FMFM Division Chief in 2008.
- 3) (Continuing from last year): District FMFM, WLD, LED, and FSHD Supervisors must monitor implementation of statewide and unit-level corrective action plans and verify completion by due dates. (MR06, 07)

#### **4. DNR approval process for intrusive activities (W.I. 3.1).**

- 1) Statewide NCR 2007-3: Department policy for preparing and closing FTPs is unclear to some staff. Isolated lapses were observed in the following areas:
  - FTPs do not match inventory records
  - FTP completion reports not prepared
  - FTP proposals missing signatures
  - Pesticide Application Plans not circulated for approvals
  - Pesticide Use Application Reports not completed
  - Lack of evaluation for public notification needs for chemical application
  - Forest Inventory records not updated in a timely manner following treatments

Corrective Action: In coordination with other DNR Divisions, the FMFM Forest Resource Management Section is taking the lead in developing a Department policy and procedure that clearly outlines the procedure for preparing Forest Treatment Proposals and Completion reports and the subsequent updating of forest inventory records.

- 2) Department Land Use Permit Policy is in conflict with the Intrusive Activity Approval Procedure in that the approval paths/sign-offs differ? Although Work Instructions take precedent over outdated policies/procedures, we have a brand new policy in conflict with the Intrusive Activity Approval Procedure that is tied to Work Instruction 3.1. A subcommittee of the FCT will discuss the issue with the chair of the Department Land Use Permit Committee.
- 3) Refine the definition of an intrusive activity: An intrusive activity is a site disturbing activity impacting soil and/or vegetation that may potentially influence water quality, T&E species, special sites (cultural, ecological, geological, and historic), or site productivity. (Maintenance of Department roads within a cleared right of way (i.e. grading, culvert replacement, beaver dam removal, improvement of the existing road bed, removal of down trees or brush, and mowing of grass) is not considered intrusive by the Department.)

#### **5. Planning**

**STATE LEVEL PLANNING:** (W.I. 1.1)

- 1) **FSC CAR 2007-2, PART A: DNR must complete and issue the State Forest Management Plan in the very near future. Deadline: February 29, 2008.**

**AND**

- 2) **SFI CAR 2007-01: The state-wide forest management plan has not been updated since 1983.** This keystone document ties together the many elements of planning at various spatial scales; the 2006 draft provides critical “Statewide Management Direction” including desired future conditions, goals, objectives, standards and guidelines for the management of recreation, vegetation, watersheds, rare species, land ownership and use, minerals and geology, forest pests, fire, the transportation system, law enforcement, governmental and tribal relations, research and education, and special resource areas.

**Corrective Action: The Statewide Forest Management Plan is to be completed and submitted to the NRC by the end of February, 2008 for Director’s action.**

- 3) (*Continuing from last year*): Division Chiefs shall ensure that Department/Division policies and procedures and forest certification Work Instructions are aligned. (MR06, 07). Work

instructions will take precedence until such time as DNR procedures and division policies are updated. (This action is ongoing)

**ECO-REGIONAL PLANNING:** (W.I. 1.3, 1.5)

- 1) **FSC CAR 2007.2, PART B: DNR must establish and submit to SCS (Scientific Certification Systems) a task-based work schedule, with associated allocation of sufficient staff resources that will assure completion of the Regional State Forest Management Plans by the end of 2008, as was committed to the auditors during the 2007 annual audit. Deadline: January 15, 2008.**

**Corrective Action: The FMFM Forest Resource Management Section will develop a task based schedule and obtain approval from the Statewide Council. The schedule will be provided to the FSC lead auditor by February 5, 2008.**

- 2) Opportunity for Improvement SFI—2007-01  
SFI Indicator 2.1.5: “Artificial reforestation programs that consider potential ecological impacts of a different species or species mix from that which was harvested.”  
There is an opportunity to improve the analysis of cover type changes desirable or needed to meet overall state forest management goals. This analysis is expected to be at the core of the Regional State Forest Plans; delays in completing these plans may require interim measures to meet this indicator and the overall planning requirements in indicator 1.1.1.
  - Extensive analysis and specialist reviews precede all harvest decisions, with particular care taken when species composition changes are planned, expected, or facilitated. Broad management guidance exists that will ultimately result in somewhat increased efforts towards targeted changes in stand composition; until this guidance is elaborated with completed Regional State Forest Management Plans that include quantitative guidance regarding approximate targeted acreage of cover type maintenance, expansion, conversion, or natural succession, the management program can not be considered to be fully functional, especially regarding the ecosystem-management goal.

Corrective Action: We expect this will come into focus and be addressed as part of the Management Area concept associated with the regional state forest management plans.

**FMU FOREST INVENTORY:** (W.I. 1.6)

- 1) (*Continuing from last year*): FMFM District Supervisors will ensure FMUs conduct a pre-inventory meeting of the next year of entry compartments to review and address "long run, landscape" issues prior to doing inventory and to enhance coordination with other Division interests. (MR06, 07)
- 2) (*Continuing from last year*): DNR will work with the Office of the State Archaeologist (OSA) to confirm the adequacy of current procedures and revise the process to meet their needs without compromising the possible sites. DNR expects to work with OSA to: 1) develop protocols for field identification and documentation of possible sites, 2) develop protocols for referring possible sites to OSA for assessment and evaluation, and 3) develop training and training materials (workshops, power points etc.) for staff. The protocol/process must be disseminated to staff. (MR06, 07) This task is assigned to the FMFM Forest Resource Management Section, with an expected completion date of July 30, 2008.

## **6. BMPs** (W.I. 3.1, 3.2, and 3.3)

1. The next step in the Resource Damage Report (RDR) system is to refine the RDR data base system and consider enhancements to make it more useable and consistent in quality. Train staff to better recognize and prioritize resource damage sites and implement RDR procedures.
2. It is recommended that responsibility (ownership) be assigned for the RDR system in order to identify and efficiently implement needed changes. FMFM is to take a lead in statewide coordination for making the RDR system more user friendly and effective, and will investigate developing a system similar to the trespass tracking system.

## **7. ORVs**

**FSC CAR 2007-4: DNR must implement the recommendations of the ORV Task Force or pursue other strategies that will accomplish the objectives behind the Task Force's recommendations. Specifically, the new statewide ORV management plan which was described to the auditors during this annual audit as presently under development with an intent to be completed by Spring of 2008 must, in fact, be completed and delivered to the NRC by that date. Deadline: April 1, 2008.**

**Corrective Action: FMFM will complete and deliver a new statewide ORV management plan that should include actions to address illegal ORV activity, to the NRC by April 1, 2008. (In order to meet this timeline, it is expected that a draft will be prepared for Division Management Teams by February 1, and for the Statewide Council by March 1.)**

## **8. Biodiversity Management** (W.I. 1.4)

- 1) FSC REC 2007.1: DNR should develop and implement guidelines for woody debris retention/recruitment in timber harvests in which biomass/bio-fuels recovery is part of the operation. Woody debris retention guidelines should assure sufficient retention of woody debris for both wildlife and nutrient cycling/soil productivity. . Deadline: 2008 annual audit

Biomass harvesting guidelines will be developed by the FMFM Forest Resource Management Section, assisted by the State Silviculturalist and Vegetative Management Team, by the time of the 2008 surveillance audit. The effort will include a review of current guidelines from other states (notably MN guidelines), working with stakeholders (including the Forest Management Advisory Committee), and providing the set of guidelines to the NRC.

- 2) Statewide NCR 2007-2: 1) FMUs did not report on number of HCVA's or ERAs in 2008 YOEC compartments reviewed. 2) OI comments on conservation objectives and SCA type is not consistently completed.

Corrective Action Plan: 1) Work Instruction 1.4 is proposed for revision to no longer require an annual report on number of HCVA's and ERAs within compartments inventoried, and to require that the DNR Monitoring Protocol Summary for Ecological Reference Areas and High Conservation Value Areas to be followed. 2) Areas of State Forest land that contain SCA, HCVA, and ERAs must be identified during forest inventory and their management specified as outlined in work instruction 1.4. Management activities on these areas must be identified in forest inventory records and must be consistent with stated special conservation objectives.

Special areas are currently being identified; however, additional focus on describing management direction is needed. District planners must verify compliance. (MR06, 07)

3) Ecological Reference Area (ERA) Planning Process:

Each identified ERA will have a draft management plan developed as part of the compartment review process.

- a) Review and Approval Procedure: ERA planning process will be coordinated with the compartment review process. Draft ERA plans should be available 14 days prior to the FMU post inventory review and 30 days prior to the FMU open house. Draft ERA plans will be included in the package “advertised” on the DNR compartment review webpage (*if not, another distribution mechanism must be developed*).
- b) The level of detail, monitoring, and management requirements included in the documents must be evaluated in order to ensure they are not overly detailed and/or beyond the scope of either personnel or monetary means. The FMFM Forest Resource Management Section will monitor this regularly.
- c) Each ERA plan will include a map and abstract that describes and summarizes management goals and objectives.
- d) Currently the FRM Section will continue to prepare plans until such time as the process can be reevaluated.
- e) At a minimum, the ERAs in a given one year-of-entry should be addressed in that year’s compartment review.

4) Biodiversity Conservation Planning Process (BCPP):

ERAs represent the current set of approved high-quality rare natural communities identified by Michigan Natural Features Inventory (MNFI) Element Occurrence records. They help meet the requirements of FSC Criterion 6.4 which calls for mapping and protecting the natural state of representative samples of existing ecosystems within the landscape. The goal of the BCPP is to conserve, restore, and protect biological diversity on Department-administered lands by establishing a network of functional representative Michigan ecosystems, using a framework of the 76 MNFI natural communities as the basis for the network. Implementation of the BCPP builds from the initial set of ERAs and will meet the requirements of Criterion 6.4. FSC CAR 2005.8b was issued to make sure the DNR started to implement the BCPP. At the request of the Statewide Council, a small team (Assist Team) is developing the process for identifying potential Biodiversity Stewardship Areas (BSAs). It is expected that these potential BSAs will be modified by the work of core design teams and reviewed through a public participation process.

It is important that the work of the Assist Team and subsequent BSA identification and public review not fall behind. Completion of the BCPP will facilitate eco-regional planning and assure compliance with biodiversity components of the certification standards.

## **9. Timber Sale Preparation** (W.I. 7.)

### 1) Statewide NCR 2007-5:

- In some cases, Form R-4050 was not being used at the pre-sale meeting with logger. In some cases, when used, documentation including name of SFE trained foreman and completion dates of Core Training are incomplete.
- In numerous cases, form R-4050 is not being filled out at completion of each payment unit. For some sales, only one timber sale inspection report form was recorded for the entire sale.
- Generally, staff are doing a very good job of documenting site visits in a chronological order, but often are not using form R-4050 as required by the work instruction. Not using Form R-4050 on every field inspection made it unclear if all elements of the timber sale contract were being evaluated.

### Corrective Action:

#### Revisions to Work Instruction 7.1 (Timber Sale Preparation and Administration Procedures)

- Revise Section II item 2 to include: A record of all timber sale inspections, site visits, and other related observations and notes will be kept on a Timber Sale Contract Field Inspection Report, R-4050. At a minimum, complete a form R-4050 (including checklist items) for each payment unit, or alternately, at each inspection (if multiple payment units were completed between inspections).
  - Revise section II, item 3, to indicate: A summary final Timber Sale Inspection Report will be attached to the Timber Sale Contract Completion Report. All timber sale inspection reports will be kept as part of the timber sale record.
  - Address LED concerns in regard to PPE use by inserting: Proper use means reasonable and adequate means and methods for the proper selection and safe use of personal protection equipment as defined by the General Industry Safety Standards.
2. Revise form R-4050 to include: "List payment units inspected".
  3. The timber pre-sale checklist must be accurately completed for all timber sales. It is noted that there is a need for staff training in regard to understanding various items on the checklist and to explain the role of the checklist in relation to the forest certification program and the DNR environmental assessment process. Training will be provided to staff in 2008 by the Forest Certification Specialist. Responsibility for QA/QC in regard to accurate and complete preparation of timber sale checklists rests primarily with Unit Managers and District Timber Sale Specialists.

## **10. Forest Regeneration** (W.I. 2.1)

*(Continuing from last year):* The Cervid Herbivory Team recommends doing a risk mapping modeling effort with assistance from USDA at the national level, which will produce a statewide risk map and identify additional data needs. \$2,500 is needed to obtain assistance from Frank Krist (Program Manager for GIS and Spatial Analysis, USFS, Forest Health Technology Enterprise Team) for 2-3 days. (MR07)

## **11. Chemical Use** (W.I. 2.2)

Responsibility for approving issuance of special use permits for application of chemicals involving multiple management units and for notification of affected FMUs is the responsibility of the FMFM Field Coordinator.

The most relevant policy is 28.46-05, EASEMENT FOR THE USE OF STATE LANDS ([http://dnrintranet/pdfs/divisions/DNR\\_PolicyProcedures/28.46.05.htm](http://dnrintranet/pdfs/divisions/DNR_PolicyProcedures/28.46.05.htm)). It states: "*The use of chemicals to control woody growth on state-owned lands is not allowed without specific permission. Application for permit to treat such rights-of-way chemically will be made to the responsible Region and the Regional Deputy Director may issue the permit. A copy of the permit will be sent to the Division, District, and Area.*" This policy needs to be updated.

## **12. Roads and Road Closures** (W.I. 3.3)

- 1) Opportunity for Improvement SFI—2007-02, SFI Indicator 2.2.7 “Minimized road construction to meet management objectives efficiently.”

There is an opportunity to improve the timeliness of road closures.

- Challenges exist in closing roads. Except for emergencies road closures are approved only after a public process and multi-division consultation, generally keyed to compartment review meetings. Not all staff attend these meetings; law enforcement staff are most likely to be absent, which is understandable given their staffing levels and broad responsibilities. Required approval by Eco Regional teams, while an important part of a robust review that considers cumulative effects and broader land management implications, can further add to delays.

Corrective Action: Road closures have a streamlined process identified in the work instructions, however, these types of closures continue to experience lengthy delay in the process of obtaining a Director’s Land Use Order to enforce the closure. The FMFM Management Team is addressing this issue.

## **13. Invasive Exotics** (W.I. 2.3)

*(Continuing issues from last year with slight modifications from the MR 06, 07):*

1. Forest health specialists will develop improved procedures for detecting, reporting, monitoring, control, and containment of invasive exotics
2. The Michigan DNR should continue to be represented on the Michigan Invasive Plants Council by both FMFM and WLD (MP). In addition, it is recommended that:
3. It is recommended that the Department investigate forming a Departmental invasive plants committee to:
  - a. Clarify each division's current invasive terrestrial plant program and program efforts and accomplishments.
  - b. Create a unified vision for a DNR invasive plant program and define each division's role within this vision.
  - c. Create a list of invasive terrestrial plants of concern by Eco-Region for training and monitoring.

- d. Seek funding and grants (funding is currently available from federal programs)
4. FMFM specifically will:
- a. Explore incorporating the Forest Health Invasive Plant Report into IFMAP.
  - b. Develop I&E tools, including a web site, for plant recognition, reporting protocols and invasive plant management strategies and policies. (In progress by WLD)

**14. Tribal Issues** (W.I. 9.1)

- 1) In order to ensure the 12 federally recognized tribes are fully engaged in DNR planning, each ecoregional team will maintain a tribal contact list. The ecoregional tribal contact list will be updated annually by the District Planning and Inventory Specialists. The ecoteams will notify tribal contacts of ecoregional planning efforts involving public meetings. FMFM Unit Managers will utilize the list to continue noticing tribal contacts of upcoming open houses and compartment reviews for the Forest Management Units.
- 2) Successful implementation of the Tribal consent decree related to the 1836 Treaty of Washington will be a focus in the 2008 Forest Certification Audit. The FMFM Management Team must provide continuing training and direction to FMFM Unit Managers and other staff in order to implement the decree.

**15. SFI Involvement** (W.I. 6.3)

No Comment

**16. Staff Training** (W.I. 5.1, 1.3, 8.1)

- 1. Training for FMU staff is needed on timber pre-sale checklist procedures.
- 2. *Continuing from last year*): Look at opportunities to offer ISO 14001 lead auditor training to the FMFM forest certification specialist and internal lead auditors.
- 3. *(Continuing from last year)*: FMFM will take a lead in offering training to other DNR Division staff, especially if there is a need to address CARs, BMP forms, or evaluation of intrusive activities.
- 4. RDR training is needed for field staff.
- 5. Training in regard to forest certification is needed for new employees (include in new employee orientation).
- 6. Training in biodiversity-related processes.

**17. Environmental Assessment and Analysis:**

- a) **FSC CAR 2007.1:**
  - a) **DNR must prepare and make publicly available (such as posting on the DNR website) a concise summary presentation of the means and mechanisms by which possible environmental effects of site-disturbing activities on the state forests are identified and considered prior to undertaking such actions.**
  - b) **In the document requested in Part (a) of this CAR, or in a separate document, DNR must provide a concise overview of the process by which possible environmental impacts are considered in decisions not covered by compartment reviews. If current procedures do not**

**assure adequate quality and transparency of such impact analyses, DNR must develop new tools (such as checklists or other guidance documents).**

**Deadline: Part (a) February 1, 2008; Part (b) June 1, 2008.**

**Observation:** In response to CAR 2006.3, DNR prepared a document that comprehensively documents the various means and mechanisms by which environmental analyses/assessments are conducted prior to and in support of site disturbing activities. However, due to its length, this document does not constitute a tractable and concise overview that will readily enable interested stakeholders to understand and take advantage of the means available to them to offer input and to be reassured that, in fact, environmental assessments are being undertaken. Additionally, as part of the response to CAR 2006.3, DNR initially intended to create a checklist that would help to assure and to better document that possible environmental impacts are being considered in decisions that are not covered by compartment reviews. Subsequently, and prior to the 2007 audit, DNR opted not to develop this sort of checklist.

**Corrective Action: The FMFM Forest Resource Management Section will develop a document that will inform the public about our environmental analysis process and related procedures by February 1, 2008. Tools (such as checklists other guidance documents) to assist DNR staff will be developed by June 1, 2008.**

2. Statewide NCR 2007-4: The Research Summary document was finalized by March 31, but not made available until July 31, 2007. The report did not describe development and implementation of research projects and incorporation of findings into the DNR activities and programs.
  - The written report summarizing all DNR research must be completed and distributed in a timely manner because the SFI Standard explicitly requires a reporting on research.
  - Have Department research supervisors commit to improving methods for information transfer within their respective research programs.
  - Inform staff who their research liaison is for each Division and do a better job of communicating research happenings on State Forest lands.

Corrective Action: FMFM Forest Health, Inventory, and Monitoring Unit Supervisor will take the lead and will work with other Division research coordinators to produce a summary in a more timely manner.

## **18. Stakeholder Consultation/Involvement :**

### **FSC CAR 2007.3:**

- a) **DNR must first identify and design a process for addressing stakeholder consultation now that the Public Involvement Work Group (PIWG) is no longer part of the strategy.**
- b) **Once a process has been established, DNR must then develop a comprehensive, cohesive strategy for identifying and implementing opportunities for enhanced stakeholder consultation and public transparency. As part of this effort, DNR must complete the review of existing compartment review procedures, initiated in 2007, and how these procedures can be improved to facilitate more meaningful public involvement.**

**Deadline: Part (a) February 15, 2008; Part (b) by the time of the 2008 annual audit.**

**Corrective Action:**

- a) Additional direction is needed to address part (a) of the CAR. The SWC has implemented an effort in the Southern Lower Peninsula to develop a process for stakeholder collaboration that can be considered for use as a template for ecoregional planning consultation/involvement statewide. The FMFM Forest Resource Management Section Leader will develop the matrix described below in part b in order to clarify the Department strategy for stakeholder involvement.**
  
- b) FMFM Forest Resource Management section will develop a matrix to clarify what is in our stakeholder consultation “toolbox”, what we are doing and/or are required to do in regard to stakeholder involvement, and who makes the stakeholder involvement/consultation decisions. In addition, the FMFM Forest Resource Management Section will identify improvements for the Compartment Review process.**

**19. Other :**

## Appendix A:

### **SFI & FSC Corrective Action Requests, SFI Opportunities to Improve, and FSC Recommendations issued in 2007:**

#### **SFI CARs**

**CAR SFI 2007-01:** SFI Indicator 1.1.1 requires management planning to cover a variety of resource issues. While most aspects of the planning requirement are met, many plans are somewhat out of date. The draft “State Forest Management Plan” is a critical element for the overall management program but it has not been finalized or approved.

The DNR has developed a plan to address this issue, with an expected date of February, 2008 for the release of an approved State Forest Plan. Progress in implementing the planned corrective action will be reviewed in subsequent surveillance audits.

#### **FSC CARs**

**FSC CAR 2007.1:** a) DNR must prepare and make publicly available (such as posting on the DNR website) a concise summary presentation of the means and mechanisms by which possible environmental effects of site-disturbing activities on the state forests are identified and considered prior to undertaking such actions. b) In the document requested in Part (a) of this CAR, or in a separate document, DNR must provide a concise overview of the process by which possible environmental impacts are considered in decisions not covered by compartment reviews. If current procedures do not assure adequate quality and transparency of such impact analyses, DNR must develop new tools (such as checklists or other guidance documents).  
Deadline: Part (a) February 1, 2008; Part (b) June 1, 2008.

**FSC CAR 2007.2:** a) DNR must complete and issue the State Forest Management Plan in the very near future. b) DNR must establish and submit to SCS a task-based work schedule, with associated allocation of sufficient staff resources, that will assure completion of the Regional State Forest Management Plans by the end of 2008, as was committed to the auditors during the 2007 annual audit. Deadline: Part (a) February 29, 2008; Part (b) January 15, 2008.

**FSC CAR 2007.3:** a) DNR must first identify and design a process for addressing stakeholder consultation now that the PIWG is no longer part of the strategy. b) Once a process has been established, DNR must then develop a comprehensive, cohesive strategy for identifying and implementing opportunities for enhanced stakeholder consultation and public transparency. As part of this effort, DNR must complete the review of existing compartment review procedures, initiated in 2007, and how these procedures can be improved to facilitate more meaningful public involvement. Deadline: Part (a) February 15, 2008; Part (b) by the time of the 2008 annual audit.

**FSC CAR 2007.4:** DNR must implement the recommendations of the ORV Task Force pursue other strategies that will accomplish the objectives behind the Task Force’s recommendations. Specifically, the new statewide ORV management plan which was described to the auditors

during this annual audit as presently under development with an intent to be completed by Spring of 2008 must, in fact, be completed and delivered to the NRC by that date. Deadline: April 1, 2008

### **SFI Opportunities to Improve**

OFI SFI-2007-01 – Indicator 2.1.5: “Artificial reforestation programs that consider potential ecological impacts of a different species or species mix from that which was harvested.” There is an opportunity to improve the analysis of cover type changes desirable or needed to meet overall state forest management goals. This analysis is expected to be at the core of the three regional state forest plans; delays in completing these plans may require interim measures to meet this indicator and the overall planning requirements in indicator 1.1.1.

OFI SFI-2007-02 – Indicator 2.3.7 “Minimized road construction to meet management objectives efficiently.” There is an opportunity to improve the timeliness of road closures.

### **FSC Recommendations:**

FSC REC 2007.1: DNR should develop and implement guidelines for woody debris retention/recruitment in timber harvests in which biomass/bio-fuels recovery is part of the operation. Woody debris retention guidelines should assure sufficient retention of woody debris for both wildlife and nutrient cycling/soil productivity. . Deadline: 2008 annual audit

# Appendix B



Michigan Department of Natural Resources - Forest, Mineral and Fire Management

## INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2007-1
Author: Dennis Nezich	Lead Audit Team: Michael Donovan, Jim Ferris, Kim Herman, Dennis Nezich, Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/07	Work Instruction or Standard and Clause Number: 1.3 Ecoregional Plan Development	
Other Documents (if applicable): <ul style="list-style-type: none"> <li>Internal Audit NCRs 45-2007-02, 73-2007-1, 61-2007-2, 71-2006-2</li> <li>Ecoregional planning timeline</li> <li>Management Review Report 1-30-07</li> </ul>		Responsible Manager(s): Statewide Council and Division Management Teams
<b>REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION:</b> <u>Work Instruction 1.3:</u> <ul style="list-style-type: none"> <li>The Ecoregional Plans will be completed in 2007 following approval of the State Forest Plan.</li> <li>All DNR personnel participate in the planning process as a resource to the Eco-regional Planning Team. Implement the plan through on-the-ground operations</li> </ul> <u>Management Review Report 1-30-07:</u> <ul style="list-style-type: none"> <li>By March 1, 2007, through the issuance of additional written advice to the three eco-regional planning teams, assure that the eco-regional plans incorporate specific, quantitative direction/guidance that will effectively inform decision making at the compartment level. This direction must include measurable and geographically-specific targets that will enable/assure that FMU- and compartment-level actions are compatible with the attainment of the DNR's multi-resource and biodiversity goals and objectives.</li> <li>Written guidance for the ecoteams to address this CAR will come under the auspices of the statewide council.</li> </ul>		
<b>OBSERVED NONCONFORMITY:</b> <ul style="list-style-type: none"> <li>The Ecoregional State Forest Management Plans will not be completed by the current deadline of December 31, 2007.</li> <li>Communications between FMU staff and the Ecoregional planning teams have been minimal.</li> <li>There is a lack of understanding concerning management implications of the pending ecoregional plans.</li> </ul>		
<b>ROOT CAUSE ANALYSIS (Describe the cause of the problem):</b> Differing approaches by the ecoregional teams had to be sorted out and standardized. Change in ecoregional planning direction (partly prompted by external surveillance audit CARs) involved a significant time delay in order to develop, gain approval, and begin to implement new planning concepts. A couple of the more major changes involved development of a management area concept, and another involved splitting the planning effort into two separate plans – one for state lands, and another for all lands within the ecoregion.		
<b>CORRECTIVE ACTION (Recommended - Proposed corrective action).</b> <ul style="list-style-type: none"> <li>Update Department staff on status of ecoregional planning and training in how it will impact operations.</li> <li>Issue written advice to the ecoregional planning teams to ensure that specific, quantitative guidance that will effectively inform decision making at the compartment level is incorporated into plans.</li> <li>Update Work Instruction 1.3 to reflect revised timeline and procedures.</li> </ul>		
CORRECTIVE ACTION PLAN ACCEPTED:	FCIT: Date 1-11-08	
Follow Up Comments:		



# 2006 Statewide Non-Conformance Reports:

Michigan Department of Natural Resources - Forest, Mineral and Fire Management

## INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2007-2
Author: Dennis Nezich	Lead Audit Team: Michael Donovan, Jim Ferris, Kim Herman, Dennis Nezich, Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/07	Work Instruction or Standard and Clause Number: 1.4 Biodiversity Management on State Forest Lands	
Other Documents (if applicable): <ul style="list-style-type: none"> <li>Management Review Report 1-30-07</li> <li>Internal Audit NCRs 45-2007-3, 73-2007-2, 61-2007-3, 71-2007-3</li> </ul>		Responsible Manager(s): FMFM District Managers and FMFM District Inventory and Planning Specialists
<b>REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION:</b> <u>Management Review Report 1-30-07:</u> <ul style="list-style-type: none"> <li>Areas of State Forest land that contain SCA, HCVA, and ERAs must be identified during forest inventory and their management specified as outlined in work instruction 1.4. Management activities on these areas must be identified in forest inventory records and must be consistent with stated special conservation objectives.</li> <li>Special areas are currently being identified; however, additional focus on describing management direction is needed. Additional staff training is required. District planners must verify compliance.</li> </ul> <u>Biodiversity Work Instruction 1.4:</u> <ul style="list-style-type: none"> <li>Monitoring: On an annual basis, FMUs will report on the number of HCVAs and ERAs contained within compartments reviewed. A summary table for each FMU will report on the management activities approved for HCVA/ERA within the compartment review process for that year.</li> <li>In OI, comments identify specific or proposed conservation objective using Conservation <u>Area Coding</u> Appendix B, Conservation Area Management Guidance document for coding direction. Determine management guidelines from the Conservation Area Management Guidance document.</li> </ul>		
<b>OBSERVED NONCONFORMITY:</b> <ul style="list-style-type: none"> <li>FMUs did not report on number of HCVAs or ERAs in 2008 YOE compartments reviewed.</li> <li>OI comments on conservation objectives and SCA type is not consistently completed.</li> </ul>		
<b>ROOT CAUSE ANALYSIS (Describe the cause of the problem.):</b> <ul style="list-style-type: none"> <li>FMFM Unit Managers were not aware of the requirement to report on number of HCVAs and ERAs.</li> <li>Some staff were unaware of the requirement, or did not code, stand level comments in regard to conservation objectives and/or management direction for HCVAs and ERAs.</li> </ul>		
<b>CORRECTIVE ACTION (Recommended – Proposed corrective action).</b> <ul style="list-style-type: none"> <li>June 2007 revision to Work Instruction 1.4 assigns responsibility to FMFM District Inventory and Planning Specialists for reporting on the number of HCVAs and ERAs contained within compartments annually reviewed.</li> <li>The monitoring section of WI 1.4 should be re-evaluated for reporting requirements.</li> <li>District supervisors shall ensure staff code conservation objectives and management direction in stand remarks for all HCVAs and ERAs.</li> </ul>		
CORRECTIVE ACTION PLAN ACCEPTED:		FCIT: Date 1-11-08
Follow Up Comments:		



## INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2007-3
Author: Dennis Nezich	Lead Audit Team: Michael Donovan, Jim Ferris, Kim Herman, Dennis Nezich, Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/07	Work Instruction or Standard and Clause Number: 2.1 Reforestation 2.2 Use of Pesticides and Other Chemicals on State Forest Lands	
Other Documents (if applicable): <ul style="list-style-type: none"> <li>• Internal Audit NCRs 45-2007-05, 45-2007-06, 73-2007-04, 73-2007-05, 61-2007-4, 71-2007-5</li> </ul>	Responsible Manager(s): Managers at Unit and District levels	
<b>REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION:</b>		
<u>Work Instruction 2.1 Reforestation:</u> <ul style="list-style-type: none"> <li>• Requires conformance with Operation Inventory updating procedure. Operations Inventory Manual, Section VIII, Updating Procedures, states: "Stand information can be updated at any time, but it should be updated at least annually. Submit new information for stands which received treatment during the past year".</li> </ul>		
<u>Work Instruction 2.2 Use of Pesticides and Other Chemicals on State Forest Lands:</u> <ul style="list-style-type: none"> <li>• Prescriptions - When a Forest Treatment Proposal (FTP)(R-4048) requiring a pesticide application is approved, complete a pesticide application plan (PAP,R-4029).</li> <li>• Operational Use of Pesticides - Application and Evaluation: Upon completion of a pesticide application, complete a Forest Treatment Completion form (FTC, R-4048-1) and an attached Pesticide Use Evaluation Report (PUER, R-4029-1).</li> <li>• Operational Use of Pesticides: Notification - The need for public notification is determined at the Forest Management Unit and reviewed by the FMFM District Supervisor.</li> </ul>		
<b>OBSERVED NONCONFORMITY:</b>		
Department policy for preparing and closing FTPs is unclear to some staff. Isolated lapses were observed in the following areas: <ul style="list-style-type: none"> <li>• FTPs do not match inventory records</li> <li>• FTP completion reports not prepared</li> <li>• FTP proposals missing signatures</li> <li>• Pesticide Application Plans not circulated for approvals</li> <li>• Pesticide Use Application Reports not completed</li> <li>• Lack of evaluation for public notification needs for chemical application</li> <li>• Forest Inventory records not updated in a timely manner following treatments</li> </ul>		
<b>ROOT CAUSE ANALYSIS (Describe the cause of the problem.):</b>		
The primary issue appears to be that staff are either confused, unclear, forget, or do not have the time to document completion of forest treatment proposals.		
<b>CORRECTIVE ACTION (Recommended - Proposed corrective action).</b>		
<ul style="list-style-type: none"> <li>• Develop a Department policy and procedure that clearly outlines the procedure for preparing Forest Treatment Proposals and Completion reports and the subsequent updating of forest inventory records.</li> <li>• District supervisors to monitor conformance and arrange for necessary training.</li> </ul>		
<b>CORRECTIVE ACTION PLAN ACCEPTED:</b>	<b>FCIT:</b>	
	Date 1-11-08	
<b>Follow Up Comments:</b>		



## INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2007-4
Author: Mike Donovan	Lead Audit Team: Michael Donovan, Jim Ferris, Kim Herman, Dennis Nezich, Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/07	Work Instruction or Standard and Clause Number: 5.1 Coordinated Natural Resource Management Research	
Other Documents (if applicable): <ul style="list-style-type: none"> <li>• Internal Audit NCRs 45-2007-08, 73-2007-08, 61-2007-5, 71-2007-10</li> </ul>	Responsible Manager(s): Research leads – all Divisions FMFM Forest Resource Management Section	
<b>REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION:</b> <u>Coordinated Natural Resource Management Research Work Instruction 5.1</u>		
<ul style="list-style-type: none"> <li>• The research coordinators from each Division or Bureau must compile a summary of research activities and expenditures prior to an annual meeting with other research program leads. The summary will include in-house, collaborative and contracted research.</li> <li>• The summary will describe development and implementation of research projects and incorporation of findings into DNR activities and programs.</li> <li>• The Coordinators will meet on an annual basis to jointly review the summaries and discuss DNR research needs, opportunities, and implementation. The FMFM Forest Certification Planner will facilitate the review and ensure timely update of the report.</li> <li>• An annual research summary report will be published by December 15, 2005, and thereafter in conjunction with the annual management review. The summary report must be made available to all DNR staff.</li> </ul>		
<b>OBSERVED NONCONFORMITY:</b> The Research Summary document was finalized by March 31, but not made available until July 31, 2007. The report did not describe development and implementation of research projects and incorporation of findings into the DNR activities and programs.		
<b>ROOT CAUSE ANALYSIS (Describe the cause of the problem.):</b>		
<ul style="list-style-type: none"> <li>• Not all Divisions keep easily available records of their support the projects. Some Divisions took longer to respond to information request than others.</li> <li>• Research is reported upon in a variety of ways at the Division level in the DNR. No one in DNR Research has been assigned responsibility to create a DNR wide summary of research that reports on the details required in the work instruction.</li> <li>• The field organization of the DNR, especially FMFMD coordinates at the local level with groups requesting permission to perform research on State forest Land. These research projects are not well tracked and reported upon through the research liaisons for the organization. Concurrently, research activities funded by the Divisions are not always effectively reported upon to the entire organization.</li> </ul>		
<b>CORRECTIVE ACTION (Recommended - Proposed corrective action).</b>		
<ul style="list-style-type: none"> <li>• The written report summarizing all DNR research must be made a primary because the SFI Standard explicitly requires a reporting on research.</li> <li>• Have Division research supervisors commit to improving methods for information transfer within their respective research programs.</li> <li>• Inform staff on who their research liaison are for each Division and do a better job of communicating research happening on State Forest lands.</li> </ul>		
<b>CORRECTIVE ACTION PLAN ACCEPTED:</b>	<b>FCIT:</b> Date 1-11-08	
Follow Up Comments:		



## INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2007-5
Author: Dennis Nezich	Lead Audit Team: Michael Donovan, Jim Ferris, Kim Herman, Dennis Nezich, Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/07	Work Instruction or Standard and Clause Number: 7.1 Timber Sale Preparation and Administration Procedures	
Other Documents (if applicable): Internal Audit NCRs 45-2007-10, 73-2007-9, 61-2007-7, 71-2007-12		Responsible Manager(s): Management Review Team Managers at Unit and District levels
<p><b>REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION:</b></p> <p><u>7.1 Timber Sale Preparation and Administration Procedures:</u></p> <ul style="list-style-type: none"> <li>• Conduct a Pre-Sale Meeting with the purchaser and or logging crew. At the pre-sale meeting record the following in the Remarks section of the initial Timber Sale Contract-Field Inspection Report (R-4050)" ....Record the name of SFE trained foreman on R-4050</li> <li>• During each inspection visit, record observations and non-compliances using form R-4050</li> <li>• At a minimum fill out a Timber Sale Contract-Field Inspection Report (R-4050) when each payment unit is complete based on the accumulated notes recorded during previous inspections."</li> </ul>		
<p><b>OBSERVED NONCONFORMITY:</b></p> <ul style="list-style-type: none"> <li>• In some cases, Form R-4050 was not being used at the pre-sale meeting with logger. In some cases, when used, documentation including name of SFE trained foreman and completion dates of Core Training are incomplete.</li> <li>• In numerous cases, form R-4050 is not being filled out at completion of each payment unit. For some sales, only one timber sale inspection report form was recorded for the entire sale.</li> <li>• Generally, staff are doing a very good job of documenting site visits in a chronological order, but often are not using form R-4050 as required by the work instruction. Not using Form R-4050 on very field inspection made it unclear if all elements of the timber sale contract were being evaluated. .</li> </ul>		
<p><b>ROOT CAUSE ANALYSIS (Describe the cause of the problem.):</b></p> <p>Many staff feel too much paperwork results when a R-4050 is required for every payment unit. Often, multiple payment units are completed in between site visits, therefore, multiple forms may result for a single visit. Staff often prefer to write a sale narrative to track sale progress, as opposed to using the standard inspection form.</p>		
<p><b>CORRECTIVE ACTION (Recommended – Proposed corrective action).</b></p> <ul style="list-style-type: none"> <li>• Revise Work Instruction 7.1, section II, item 3 to read: At a minimum, fill out a Timber Sale Contract - Field Inspection Report (R-4050) at each inspection. A summary final Timber Sale Inspection Report will be attached to the Timber Sale Contract Completion Report.</li> <li>• Revise form R-4050 to include: "List payment units inspected".</li> </ul>		
CORRECTIVE ACTION PLAN ACCEPTED:	FCIT: Date 1-11-08	
Follow Up Comments:		

## Appendix C

### 2007 Forest Certification Internal Audit Process

#### 1-12-07

**The intent of the internal audits is to:**

- 1) provide a real time audit experience for DNR in FMUs (preparedness)
- 2) provide field testing for Work Instructions (functionality, application, completeness)
- 3) provide training for DNR auditors and audit methods
- 4) provide DNR with preliminary forest certification conformance.

**General Schedule**

			Recommended Attendees	Comments
Day 1	? am – 5 pm	Auditors arrive, organize for audit,, check documents	Internal auditors, FMU mgr and secretary	The audit team will arrive by noon on day one to plan audit logistics with the Unit Manager (and possibly Secretary) and locate and review documents. At end of the day, lead auditor will provide FMU mgr with list of additional requested info/documents.
Day 2	8 a.m. – 5 pm	Field site visits	FMU staff from all Divisions, District staff.	Brief opening meeting to organize. Audit team will visit field sites.
Day 3	8 a.m. – 5 pm	Prepare for closing meeting and write NCRs. Last minute site visits if necessary.	Select unit staff. Use telephone conferencing during the closing meeting for staff at remote locations	Audit Team to prepare NCRs and closing meeting comments. Select site visits with select staff and/or additional document search will be done only if necessary to close audit gaps. Hold closing Meeting held before end of day.

### **Recommended Attendees:**

**Audit team:** Name (Lead Auditor), Name, Name

### **Auditee:**

**FMFM:** FMU Mgr (Lead for Auditee), Fire supervisor, foresters, forest technicians, administrative staff, fire officers, District supervisor, District specialists

**Wildlife:** Biologist (WB), District supervisor, specialists

**Fisheries:** Biologist (FB), District supervisor, specialists

**FC Specialist:** Will function to provide audit oversight and coordination and ensure audit process is as efficient and effective as possible. Advise lead auditors during audits, with authority to influence direction of the audits. Will not function as lead auditor or as staff auditor, except as substitute for absent person. Conduct post internal audit evaluation to improve process.

### **Internal Audit process:**

Because the Internal Audits are providing additional development and training purposes, some roles, responsibilities and communication will be somewhat different than what will occur during the 3<sup>rd</sup> party external certification audits.

An internal audit report will be prepared that will include a brief audit summary and a set of “MDNR Internal Audit Nonconformance Reports” related to the 21 Work Instructions with emphasis on Management Review Decisions from the previous year.

Michigan DNR Forest Certification Internal Audit  
Audit Summary Template  
(12-28-06)

FMU:

Internal Audit Dates:

Internal Audit Summary Date:

Lead Auditor:

Internal Auditors:

**Comments:**

Note areas where FMU exceeds expectations (optional)

Provide number of Major non-conformances

Provide number of Minor non-conformances

List opportunity for improvement (optional)

**Definitions:**

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDNR to meet a Sustainable Forest Certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Minor Non-conformances: An isolated lapse in MDNR Sustainable Forest Certification Work Instruction implementation which does not indicate a systematic failure to consistently meet a Sustainable Forest Certification (SFI or FSC) principle, objective, performance measure or indicator. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

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

**NCRs:**

Copies of all NCRs (form R 4502) are attached to this audit summary.

### **Report and Review Procedure following the Internal Audit:**

1. Nonconformance Reports (NCRs) that describe observed nonconformity with forest certification work instructions will be prepared by lead and staff auditors during internal audits.
2. Lead Auditor will prepare a Draft Internal Audit Report (DIAR) consisting of Audit team Nonconformance Reports and a brief audit summary (cover memo). Complete at closing meeting.
3. Lead Auditor will send the DIAR to FMU Manager and send a copy to Forest Certification Specialist and District FMFM Supervisor within 1 week.
4. The FMU Manager will respond to the NCRs and assemble the root cause analysis and corrective actions for all NCRs in consultation with staff, or, dispute findings with an explanation. FMU Manager will send to the FMFM District Supervisor with copy to FC Specialist and Lead Auditor.
5. The FMFM District Supervisor will review, support, and date the NCRs. The FMFM District Supervisor will send the Internal Audit Report with approved NCRs to the Forest Certification Specialist within 4 weeks of the closing meeting. A copy of this report will also be sent to the Lead Auditor.
6. The Forest Certification Specialist will consult with Lead Auditor to confirm corrective actions satisfactorily address NCRs. The FC Specialist will review and sign the NCR corrective actions to acknowledge completion. Complete within 6 weeks of closing meeting date.
7. Forest Certification Specialist will forward Final Internal Audit Report to FCIT, FMFM Management Team, FMFM District Supervisors, all FMU Managers, and representatives from other Divisions, as identified by the FCIT Division representatives.
8. Corrective Actions will be cleared either through the Management Review Process or in the next internal audit.

### **Management Review Process and Statewide Internal Audit CARs**

1. Forest Cert Specialist makes preliminary report of statewide NCRs.
2. Forest Cert Specialist reviews with lead auditors for concurrence. Root causes and corrective actions are determined, and time lines are established. Send draft report to FCIT mgt review sub-committee for review.
3. Statewide nonconformance reports are reviewed at the annual statewide management review meeting (see WI 1.2). Forest Cert Specialist will work with FMFM and WLD Field Coordinators to prepare a draft Management Review Summary.
4. FMFM and WLD Field Coordinators will co-host a management review meeting per Work Instruction 1.2. Corrective actions, responsible managers, timelines, follow-up requirements are confirmed and Management Review Decisions are forwarded to the FCIT for review and concurrence.
5. FMFM and WLD Field Coordinators forward the final Management Review Summary to Management Teams and SWC for approval.
6. Management Review Decisions are communicated to all employees.
7. Next level supervisors must clear corrective actions when completed.

## **Internal Audit (IA) Plan Template**

**OBJECTIVE:** To review DNR field operations on the [FMU name] against the DNR Work Instructions to determine the Unit's conformance to the Work Instructions and, thereby indirectly to the Forest Stewardship Council Lake States and the Sustainable Forestry Initiative 2005-2009 Standards.

Additionally the audit is intended to:

- 1) Provide a real time audit experience for DNR Forest Management Units (FMU).
- 2) Provide field testing for Work Instructions (functionality, application, completeness).
- 3) Assess conformance with DNR forest certification program.

**SCOPE:** Operations that occur on State Forest Land within the [FMU name] Management Unit. In-water operations conducted by Fisheries and State Park management are out of scope.

**AUDIT CRITERIA:** Forest Certification standards as represented by Work Instructions (including Management Review Decisions) utilized in management of State Forest lands and, if applicable, other references such as the Water Quality Management Practices on Forest Land (BMP handbook). The current version of the Work Instructions may be found on the DNR Intranet at:

[http://www.michigan.gov/documents/CompleteSetOfWIs8-19-05\\_134656\\_7.pdf](http://www.michigan.gov/documents/CompleteSetOfWIs8-19-05_134656_7.pdf)

**FUNCTIONS:** Those individuals and functions that are involved in the implementation of Work Instructions will need to be available during the internal audit. This may include Wildlife and Fisheries Division staff depending on the sites selected for review. The FMFM Unit Manager is the lead contact for the auditee and will be required to be involved throughout the audit. The following are additional staff recommendations to consider.

- FMFM: Foresters, Forest Technicians, administrative staff, Fire Supervisor, Fire Officers , District Supervisor, District Specialists
- Wildlife: Biologist, Technicians, District Supervisor, Ecologist/Planners
- Fisheries: Biologist, District Supervisor, Specialists
- Law Enforcement Division representative
- Parks and Recreation representative

**HIGH PRIORITY ELEMENTS:** Those decisions identified in the previous years Management Review are of the highest priority.

**AUDIT PROCEDURES:** Internal Audit (IA) teams normally consisting of four people – a lead auditor and 3 staff auditors - will conduct the audit. The Lead Auditor will request initial information and documentation from the [FMU name] manager for pre-audit planning usually several weeks before the audit is scheduled. Documentation for specific field sites will be requested a few days before the audit. This documentation must be ready for the auditors on the first day of the audit. The lead auditor will provide the FMU manager with specific instructions regarding the type of documentation and the number

of copies needed. The documentation must be organized by site, in the order that sites will be visited. A “route” (county) map showing the audit site number (corresponding to the documentation package) will also be needed. An itinerary for the week will be finalized on the day before the field audit begins. Conformance to the Work Instructions will be determined by the IA team through observations, interviews with personnel and documentation provided.

**TIMETABLES:**

- Day One: Audit team will assemble at 12:00 PM on Monday, [date] at [FMU name] Headquarters. The audit team will finalize audit details such as site selections, itineraries for each day, document review needs and record keeping procedures. This is primarily a planning session for the auditors. FMU staff are not involved other than brief discussions with Unit Manager and Secretary.
- Day Two: 8:00 AM, hold office briefing (approx. 1 hr). The rest of the day will be used to review in-field operations on the [FMU name] Management Unit. Audit team may split up and visit different sites. At end of the day, Lead Auditor will provide FMU manager with a list of additional information or documents needed.
- Day Three: Audit Team prepares NCRs and finalizes the draft Internal Audit report. Follow-up site visits with select staff and/or additional document search may be done if necessary to close audit gaps. Hold closing Meeting held before end of day. Use telephone conferencing during the closing meeting for staff at remote locations.

There will be a debriefing session each day where auditors will discuss findings made during the day and to confirm the logistics of the next day. There also will be a morning briefing to reconfirm the itinerary for the day, logistics, etc.

Because of the audit schedule, the FMU manager and staff may have to work beyond their normal hours of work. The Internal Audit team is planning to complete field reviews each day around 5:00 PM, but this will depend on individual sites and locations.

**LODGING/TRANSPORTATION/LUNCHESES:** The FMU Manager is responsible for arranging lodging for the IA team, transportation to all field sites, and lunches for all those participating in the field visits.

**SAFETY:** Precautions for safety under field conditions will be observed including the use of hardhats, safety eye protection and safety footwear whenever a site with an open timber sale contract is visited. Members of the audit team will provide their own safety equipment. The FMU manager is responsible to provide safety gear as needed for other audit participants. Additionally the FMU manager is required to inform participants of any safety hazards that are likely to be encountered each day.

**MEETING SCHEDULE:** Opening meeting – Tuesday 8:00 AM @ \_\_\_\_\_ Headquarters. Closing meeting – Tentatively scheduled for Thursday afternoon @ \_\_\_\_\_ Headquarters

**AUDIT TEAM MEMBERS:** \_\_\_\_\_ (lead auditor), \_\_\_\_\_ (auditor), \_\_\_\_\_.

**CONDUCT:** Audit Team members and Auditees are expected to be honest, open and frank. Personalities, while often encroaching into audits, are not the subject of them and will not be addressed. Intent is to assess DNR field operations against the Work Instructions with particular emphasis on Management Review Decisions.

**REPORTS:** A Draft Internal Audit Report (DIAR) be prepared that will include an audit summary and a set of “MDNR Internal Audit Nonconformance Reports” (NCR’s) related to the 21 Work Instructions with emphasis on Management Review Decisions. It will present findings of nonconformance between the work instructions and field operations on the [FMU name] Management Unit. The presentation of the draft report at the closing meeting will consist of a review of the NCR’s with discussion to assure understanding and accuracy of the findings. The Lead Auditor will leave the DIAR with the FMU Manager for formulation of corrective actions. Lead Auditor will send copies to the Forest Cert Specialist and District Supervisor. Being a public agency, final documentation resulting from the audit may be subject to Freedom of Information Act requests.

**DOCUMENT RETENTION:** Documentation will be retained by the Forest Certification Specialist and the FMU according to the DNR retention schedule.

Appendix D  
**Resource Damage Report Summary:**  
**12-10-07**

**Upper Peninsula:**

	Cost	Number
Baraga	204,650	55
Crystal Falls	225,664	49
Gwinn	50,820	28
W UP total	\$481,134	132

Escanaba	258,823	106
Newberry	210,530	28
Sault Ste Marie	305,207	44
Shingleton	2,823,398	117
E UP total	\$3,597,958	295

**Lower Peninsula:**

Cadillac	1,091,810	88
Gladwin	2,918,150	47
Traverse City	116,903	91
WLP total	\$4,126,863	226

Atlanta	297,760	121
Gaylord	261,211	36
Grayling	2,270,600	59
Pigeon River Country	25,314	16
Roscommon	375,000	106
ELP total	\$3,229,885	338

UP Total	\$ 4,079,092	427
LP Total	\$ 7,356,748	564
Statewide Total:	\$11,435,840	911

**Intrusive Activities Review and Approval Process – February 5, 2007**  
**Work Instruction 3.1, Forest Operations**  
**Appendix E**

<b>Intrusive Activity</b>	<b>FMFM Approval</b>	<b>Wildlife Approval</b>	<b>Fisheries Approval</b>	<b>Other</b>
ALL Timber Sale Proposals(Included at compartment review)	Unit Manager. Timber Mgt Specialist must act within 10 working days.	Wildlife Biologist	Unit Manager	
ALL Timber Sale Proposals (Not included at compartment review)	Unit Manager. Dis. Sup, Timber Mgt Specialist must act within 10 working days.	Wildlife Biologist Wildlife Sup.	Unit Manager	
Forest Treatment Proposals (FTP) (Included at compartment review) (Multiple treatments in decade only 1 time approval with annual Completion reports)	Unit Manager and TMS	Wildlife Biologist	Unit Manager	
(FTP) Beaver, animal or dam removal not involving Dept Rd. Note: FTP is not required to remove beaver dams threatening a Department Road.	Unit Manager	Wildlife Biologist	Unit Manager	LED District Sup
Forest Treatment Proposals (FTP) (Not included at compartment review) (Multiple treatments in decade only 1 time approval with annual Completion reports)	Unit Manager and District Sup. and TMS	Wildlife Biologist and Wildlife Sup.	Unit Manager	Treatments not approved at a compartment review need review by SHPO/MNFI (allow 45 days)
Use Permit and Event Permits ( Use PR 1138-1 and follow associated procedure)	Unit Manager LAD – District Sup.	Wildlife Biologist LAD – District Sup.	Unit Manager if surface water within 500 feet LAD – District Sup.	LED District Sup SHPO/MNFI review may be needed. LAD-District Sup
Well Site Surface Use Permits	Unit Manager	Wildlife Biologist (10 day response period or inferred approval)	Unit Manager if surface water within 500 feet (10 day response or inferred approval)	

**Intrusive Activities Review and Approval Process – February 5, 2007**  
**Work Instruction 3.1, Forest Operations**  
**Appendix E**

<b>Intrusive Activity</b>	<b>FMFM Approval</b>	<b>Wildlife Approval</b>	<b>Fisheries Approval</b>	<b>Other</b>
Road Construction /Improvement Permits (Internal and external)	Unit Manager, District Sup and Field Coordinator	Wildlife Biologist	Unit Manager if surface water is within 500 feet	SHPO/MNFI review may be needed (Cara will discuss with them ASAP)
Mineral Leases	According to Department Procedure	DNR Procedure	DNR Procedure	
Mineral lease variance or change in mineral lease classification	According to Department Procedure	DNR Procedure	DNR Procedure	
Public Utility and Public Road Easements	According to Department Procedure	DNR Procedure	DNR Procedure	OLAF issuance. PRB review if involved.
Fishery Management( Use FTP or other appropriate form) -Stream bank restoration -Manual removal -Lake reclamation-chemical -Dam, removal or construction -Sand traps	Unit Manager when adjacent to, or on state forest land	Wildlife Biologist	Unit Manager, State Level review	LED District Sup  SHPO for dam construction and spoil deposit from sand removals
Forest Road/ Trail Closure Proposal	Unit Manager, Dist Sup, Field Coordinator	Wildlife Biologist, District Sup	Unit Manager	SHPO for new construction. LED Dist Sup, EcoTeam
Designated Recreation Trail Development Proposal (R 1862E)	Unit Manager, Dist Sup, Field Coordinator	Wildlife Biologist, District Sup	Unit Manager	SHPO for new construction. LED Dist Sup, Divisions and State Trails Coordinator
Water Access on or adjacent to State Forest Land: -Site development -Dredging -Site renovation	Unit Manager, Dist Sup	Wildlife Biologist, District Sup	Unit Manager	SHPO for new construction, LED Dist Sup, PRB Dist Sup, Field Coordinator