

Michigan Department of Natural Resources

Management Review Report

January 27, 2009

DNR Management Review Field Meeting

January 27, 2009

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Management Review Attendees:

- FMFM: Acting Assistant Division Chief Cara Boucher
Field Coordinators Mike Paluda & Bill O’Neill
UP and NLP District Supervisors Roger Hoeksema, Debbie Begalle, Dayle Garlock
Acting Forest Resource Management Section Leader Larry Pedersen,
Forest Certification Specialist Dennis Nezich,
Forest Certification Planner David Price
- WLD: Assistant Division Chief Doug Reeves
Field Coordinator Penney Melchoir
UP and NLP District Supervisors Terry Minzey, Mike Koss (for Bob Doepker), Tim Reis, Larry
Visser, Rex Ainslie
- LED: Lt. John Cischke
- FSHD: Basin Coordinator Steve Scott, Western Lake Superior Supervisor George Madison
- PRB Representative: District Supervisor Gary Ellenwood

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 2008, a SFI and FSC joint surveillance audit was conducted in October. DNR internal audits were conducted in June and July as part of the DNR Management Review process.

DNR Internal Audits:

In compliance with Work Instruction 1.2, four internal audits were conducted. The Forest Management Units audited included: east side of Sault Ste. Marie, Atlanta, Gaylord, and Baraga. Based upon audit results, DNR lead auditors identified four “statewide” non-conformances (see Appendix B) that require focused attention during the 2008 Management Review.

Third Annual Forest Certification Surveillance Audit:

General Overview:

The third annual surveillance audit for the maintenance of Michigan's forest certification was conducted October 21-23. The FMUs audited included Atlanta, east side of the Sault Ste. Marie (Drummond Island), and Gaylord. The audit team included Mike Ferrucci, SFI lead auditor, Robert Hrubes, FSC lead auditor, and Kyle Meister, FSC auditor trainee. Dennis Nezich, Larry Pedersen, Penney Melchoir, and either Bill O'Neill or Mike Paluda accompanied the audit team all three days.

During the first three hours of the first day (October 21st), DNR staff provided presentations and evidence to clear the four FSC Corrective Action Requests (CARs), one SFI CAR, two SFI Opportunities for Improvement (OFI), and one FSC Recommendation (REC) that were issued in 2007. (OFIs and RECs do not indicate a current deficiency, but serve to alert Michigan DNR to areas that could be strengthened or which merit future attention). Each auditor was presented with a binder which held all pertinent documents addressing each specific CAR, REC, and OFI. A brief office presentation was made by local FMFM, WLD, and FSHD field staff, and the remainder of the day (October 21st) was spent in the field touring various sites in the Atlanta FMU. After lunch the group split into two teams. Discussions focused on woody biomass harvesting issues, resource assessment procedures, timelines for planning, resource damage reports (RDRs), within stand retention issues, and timber sale preparation and administration.

The second day (October 22nd) was spent in the Sault Ste. Marie FMU. The original intent was to split the group into two teams, one for the mainland and the other to visit Drummond Island. After the morning overview and following discussion with field staff, the auditors adjusted the plan and decided that the entire group would visit Drummond Island. Major focus was directed toward ORV management issues, compliance with BMP standards, tracking and addressing RDRs, compliance with applicable laws and regulations, maintaining customary use rights, lands in and out of scope of certification, and land acquisition/management funding sources. At the end of the day the group also visited one active timber sale site.

The third and final day of the audit (October 23rd) was spent in the Gaylord FMU. Presentations on the FMU were provided by the FMU manager and staff from both Wildlife and Fisheries divisions. In addition, a special presentation was made on regional state forest planning efforts, including the management area concept. The group split into two groups to visit a variety of field sites. The auditors focused on implementing and tracking of within stand retention (patches, edges, etc.), timber sale preparation and administration procedure, follow-up on internal audit non-conformance reports, addressing RDRs, BMP standards, biomass harvesting guidelines, and lands in/out of scope. The groups returned to the Gaylord OSC in the early afternoon.

Immediately prior to the closing meeting, the auditors met with Deputy Director Mindy Koch and FMFM Division Chief Lynne Boyd. This pre-meeting included a discussion on Drummond Island ORV management issues and a workgroup formed by DNR to address these issues, identification of which specific properties acquired with federal funding are included or excluded in the scope of certification, time lines for completion of the Regional State Forest Management Plans, and follow up on internal audit results.

Overview of FSC Audit Findings:

FSC lead auditor Robert Hrubes stated that under the FSC standards, continuation of the state’s certification is warranted and that the Department has a solid conformity to these standards. He expressed his appreciation to all staff involved in this year’s audit, and offered the following general observations:

- Internal auditing of field level compliance with certification Work Instructions remains a very positive aspect of DNR’s certification engagement.
- On-the-ground collaboration between the FMFM, Wildlife, and Fisheries Departments is a very positive aspect of Michigan DNR’s management and demonstrates the staff’s commitment to managing for multiple ecological values.
- Planning at the regional and state-level continues to be in flux but changes in direction are for the better (e.g., more robust stakeholder consultation, better coordination with biodiversity planning). DNR must bring these planning initiatives to resolution and completion as soon as possible.
- ORV management requires a clarification of statutes governing appropriate use and management, and consistency in enforcement.
- DNR remains earnest in its efforts to address CARs and has the backing of key stakeholders in extending the timeline for completion of the eco-regional plans.
- DNR has demonstrated enhanced performance with respect to the timeliness of road closures, when environmental conditions or changing management requirements justify adjustments to the road network.
- Overall, DNR’s management of the state forests is on a steady course despite the increasing challenges associated with budget reductions and staff limitations.

In response to the 2007 CARs, the Department addressed all of the issues identified and closure is warranted. Dr. Hrubes issued four new CARs for 2008, and carried over one FSC Recommendation. These include the following:

FSC CARs

CAR 2008.1	<ul style="list-style-type: none"> a) The DNR must pursue every opportunity to accelerate the biodiversity conservation planning process (BCPP) and provide SCS with a detailed timeline of key milestones in the process. b) The DNR must dedicate adequate resources to support the three key planning initiatives (BCPP, Regional State Forest Management Plans, Eco-Regional Plans). Clearly, a significant element of this will be addressing the planning staff vacancy in the EUP region.
Deadline	Part a) February 1, 2009. Part b): Surveillance audit 2009

CAR 2008.2	<ul style="list-style-type: none"> a) The DNR must clarify the legal definitions and current management practices for ORV use on state lands in order to ensure consistency of enforcement and promote cross-Division support. b) The DNR must describe, in written form, acceptable conditions in locations where the intent is to provide motorized recreational use opportunities associated with standing water and mud bogs on ORV routes within the state forest system, such as those found on Drummond Island.
Deadline	Part a) June 1, 2009; Part b): Surveillance audit 2009

CAR 2008.3	The Michigan DNR shall clarify the scope of what it considers to be covered by its FSC forest management certificate.
Deadline	May 1, 2009

CAR 2008.4	The Michigan DNR shall provide documentation as to how the organization uses the results of the internal auditing process to monitor the effectiveness of and improve day to day operations, standard procedures, and the State Forest Management Plan. Furthermore, the Michigan DNR shall ensure that its internal auditing procedures are followed until completion.
Deadline	Surveillance audit 2009

FSC Recommendation:

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	This recommendation will continue to be monitored and carried over to the 2009 surveillance audit.

Overview of SFI Audit Findings:

The Michigan DNR’s SFI Program was found to be in continuing conformance with the SFIS Standard. A review prior to the audit, confirmed during the October 2008 surveillance audit, showed that the department has implemented the corrective plan for the previous non-conformance, which is now closed. In addition, the Michigan DNR addressed the two opportunities for improvement which were identified during the 2007 audit.

The NSF-ISR SFI Certification Audit Team issued one new minor non-conformance and five opportunities for improvement. The Minor Non-conformance issued during this audit is described below:

SFI 2008.01: SFI Indicator 3.1.1 requires a “Program to implement state or provincial equivalent BMPs during all phases of management activities.” SFI Indicator 3.2.5 states “Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.” Roads on Drummond Island are not maintained in accordance with road BMPs for roads. The current routes used by Jeeps and large 4wd vehicles are, in places, not passable by 2-wd vehicles and have inadequate provisions for drainage (surfacing, road crown, etc). These roads are being upgraded, often with provisions for adequate road surface and/or drainage. Plans are under development to include “challenge road” sections that are not fully drained. There are no existing BMPs or standards for such roads that would ensure environmental protections (while offering the desired recreational experience).

(The DNR has developed a corrective action plan to address this issue. Progress in implementing the planned corrective action will be reviewed in the next surveillance audit.)

Five opportunities for improvement were identified:

OFI SFI-2008.01: SFI Indicator 1.1.2 requires “Documentation of annual harvest trends in relation to the sustainable forest management plan.” There is an opportunity to improve the information in management plans regarding planned harvest levels.

OFI SFI-2008.02: SFI Indicator 2.3.6 requires “Criteria that address harvesting and site preparation to protect soil productivity.” There is an opportunity to improve by completing biomass harvesting guidelines.

OFI SFI-2008.03: Indicator 2.2.6 requires “Use of best management practices appropriate to the situation; for example: adjoining landowners or nearby residents notified of applications and chemicals used; appropriate multi-lingual signs or oral warnings used; public road access controlled during and after applications; streamside and other needed buffer strips appropriately designated; positive shut-off and minimal drift spray valves used; drift minimized by aerially applying forest chemicals parallel to buffer zones; water quality monitored or other methods used to assure proper equipment use and stream protection of streams, lakes and other water bodies; chemicals stored at appropriate locations; state reports filed as required; or methods used to ensure protection of federally listed threatened & endangered species.” There is an opportunity to improve consistency of paperwork and required notifications involving chemical use.

OFI SFI-2008.04: Indicator 3.1.4 requires “Monitoring of overall BMP implementation.” There is an opportunity to improve the consistent use of the Resource Damage Report (RDR) process.

OFI SFI-2008.05: Indicator 4.2.2 requires “A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.” Indicator 9.1.1 requires “Current financial or in-kind support of research to address questions of relevance in the region of operations. The research will include ... d. wildlife management at stand or landscape levels; ...” There is an opportunity to improve the process for disseminating information gained through in-house research.

Positive Practices in the Michigan State Forest System

The sustainable forestry program of the Michigan DNR has many clear strengths which factored strongly into the finding of continuing conformance with the certification requirements. The audit found that the department’s SFI program continues to exceed the requirements of the SFI Standard 2005-2009 in the following areas:

- Assignment of certification responsibilities within the DNR (e.g. work instructions and the regular Forest Certification Updates provided to staff);
- Sustainable harvest levels are conservative, and can clearly be sustained;
- No exotic species are planted, and extensive efforts are made to remove exotic invasive plant species;
- The forest health and protection programs for Integrated Pest Management;
- Protection of rare, threatened, or endangered species;
- Biodiversity protections, including green-tree retention;
- Clearcut size and configuration;
- Public recreation opportunities; and
- Internal audit process and follow-up management review.

In the closing meeting for the audit, Mr. Ferrucci and Mr. Hrubes again thanked the department staff participating in the audit. They are planning to conduct next year's surveillance audit during approximately the same time period.

Focus in 2009:

Forest certification is a continuous improvement system so there are always new challenges, new CARs, and opportunities to improve. Addressing the 2008 surveillance audit CARs, SFI Opportunities for Improvement, the continuing FSC Recommendation, the four 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 2009.

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 Team (FCT) 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) The three Field Coordinators agree on a revised and final Management Review Report which will be forwarded to the FMFM, WLD, FSHD, LED, and PRB Management Teams by Feb 16, 2009.
- b) Management Team comments on MRR due March 14, 2009 to Mike Paluda who will review with the FCT Executive Committee.
- c) Send MRR and proposed WI revisions to Statewide Council for information by March 31, 2009, with approval desired by May 5, 2009.
- 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 2008 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 2008, 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 FCT reviewed these draft NCRs, and approved a final version for consideration by the Management Review Team (see Appendix B).

Summary of Internal Audit non-conformances
Bold indicates statewide non-conformance

WI	#FMUs w/NCRs	
1.1	2	Staff knowledge of WIs needs improvement (2).
1.2	1	Staff not aware of management review decisions (1). Staff unclear about certification of Wildlife lands (1).
1.3	4	Ecoregional plans significantly behind schedule and will not be completed by December 2008 (4).
1.4	2	SCA conservation objectives not coded in inventory (1). ERA plans not completed for consideration at the compartment review (1)
2.1	1	Coding in forest inventory not updated to reflect completed planting (1).
3.1	4	Temporary stream protection structures not monitored (1). WLD did not obtain approvals for intrusive activity (2). FMFM approvals for intrusive activity not complete (2). Spill kit missing on truck with auxiliary fuel tank (1). No system to prioritize RDRs (1). Staff did report RDR site (1). Lack of a mechanism for notification of DNR regarding rehabilitation of well sites and no mechanism for DNR field staff to approve completion of reclamation requirements (1). Time delay in addressing funded RDR sites (1). Event held but permit not issued (1)
3.3	2	Procedure to close roads was not fully implemented (1). Failure to immediately exercise emergency road closure to address significant environmental issue (1).
5.1	4	Research summary report lacks information that facilitates incorporation into DNR activities (4).
6.2	1	ORV issues on Drummond Island (1).
7.1	4	Form R 4050 not utilized as outlined in work instruction including: R 4050 not prepared by PU or visit (3); checklist portion of form R 4050 not completed (2); no documentation of SFE trained foreman (2); and no documentation of pre-sale meeting on R 4050 (2). PPE violations by contractor (1). Not documenting variance to TS sale contract specifications (operating during slippery bark season) (1). Contract violation noted (1). Contract specifications not followed regarding reserved trees (2). Green up guideline variance not documented on pre-TS checklist (1). Use of outdated pre-TS checklist (1). Pre-TS checklist does not provide reason for exceeding 100 acres (1). Spill observed on TS area (1).
7.2	1	No signed TS contract (1). Public safety issue not promptly addressed (1).
8.1	4	FSDH and WLD do not follow the structured training process outlined in WI (3) (i.e. training gaps not accessed, training records not up to date, and annual list of training needs not compiled at performance review. Incomplete training record (1).

II. Decisions, direction, responsibility and time lines

1. Clarify the scope of certification:

FSC CAR 2008.3: The Michigan DNR shall clarify the scope of what it considers to be covered by its FSC forest management certificate. *Deadline: May 1, 2009*

Note: (*Continuing from 2007 and 2008*): It is unclear based upon the original certification process and certification documents whether all or some state game, wildlife, and research areas within State Forest boundaries are certified.

Corrective Action:

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.

- It is recommended that a memo be prepared by the FMFM and WLD Division Chiefs and sent to external auditors by May 1.
- It is recommended that a joint memo be sent from the FMFM and WLD Division Chiefs to DNR staff to clarify which specific lands are in scope by June 1.

2. Management Review (W.I. 1.2):

A) **FSC CAR 2008.4:** The Michigan DNR shall provide documentation as to how the organization uses the results of the internal auditing process to monitor the effectiveness of and improve day to day operations, standard procedures, and the State Forest Management Plan. Furthermore, the Michigan DNR shall ensure that its internal auditing procedures are followed until completion. *Deadline: Surveillance audit 2009*

Corrective Action:

- (*Continuing from 2006, 2007, 2008*): District FMFM, WLD, LED, and FSHD Supervisors must monitor implementation of statewide and unit-level corrective action plans and verify completion by due dates.
 - Internal Audit Procedures for 2009 shall be modified to clearly indicate who developed the root cause analysis and corrective actions for internal audit NCRs. In addition, the manager identified as responsible for implementing corrective actions and their next level supervisor will verify that corrective actions were implemented. (Note that Appendix C includes recommendations (highlighted) for revision to the NCR Report Form, R 4502). The Forest Certification Specialist will track NCRs and verify closure with responsible manager (RM) and RM Supervisor.
- B) FMUs to internally audit in 2009 include Gwinn, Newberry, Pigeon River Country, and Cadillac.

3. ORV Program:

SFI CAR 2008-01: Standard Number and Clauses: 2005-2009 Sustainable Forestry Initiative Standard®: SFI Indicator 3.1.1 “Program to implement state or provincial equivalent BMPs during all phases of management activities.” and SFI Indicator 3.2.5 “Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.”

Description: Roads on Drummond Island are not maintained in accordance with BMPs for roads. The current routes used by Jeeps and large 4wd vehicles are, in places, not passable by 2-wd vehicles and have inadequate provisions for drainage (surfacing, road crown, etc). These roads are being upgraded, often with provisions for adequate road surface and/or drainage. Plans are under development to include “challenge road” sections that are not fully drained. There are no existing BMPs or standards for such roads that would ensure environmental protections (while offering the desired recreational experience).

AND

FSC CAR 2008.2: a) The DNR must clarify the legal definitions and current management practices for ORV use on state lands in order to ensure consistency of enforcement and promote cross-Division support. b) The DNR must describe, in written form, acceptable conditions in locations where the intent is to provide motorized recreational use opportunities associated with standing water and mud bogs on ORV routes within the state forest system, such as those found on Drummond Island. *Deadline: Part a) March 1, 2009; Part b): Surveillance audit 2009*

Corrective Action:

A District Trails Analyst has recently been hired and the Sault Ste. Marie FMU Fire and Recreation Supervisor position has been filled on a permanent basis. Approximately \$150,000.00 in total was allocated for ORV remediation and/or Jeep Trail upgrade on Drummond Island.

A DNR Drummond Island Work Group has been appointed and charged with the review of the recreation and transportation system, which includes resource protection considerations. The Work Group’s focus is on where ORV routes will be located and how many miles will be established. Leadership’s expectation is a consensus product. The Work Group is comprised of DNR staff from the Resource Divisions and representatives of the various local interest groups including the Drummond Island Sportsmen’s Club, Snowmobile Club, ORV Club, ORV Trails grant sponsor, local business people, Township Supervisor, The Nature Conservancy, general landowners, and the Drummond Island Tourist Association. Other members include off-island user groups including the Great Lakes 4wd Association, Jeep Jamboree USA and Hummer Club International. Updates on the first meeting were provided to the DNR’s ORV Advisory Board at their November 5, 2008 meeting. Agreement on issues was reached after two meetings and a DRAFT proposal is currently being written.

A description of acceptable conditions for ORV Routes on Drummond Island will be developed by the Department after the Work Group plan is accepted. These standards will be implemented and will ensure environmental protections, while offering the desired recreational experience. These standards reportedly exist in other states, and are currently being researched by interest groups and DNR staff who are participating in the Work Group.

When acceptable conditions are drafted, they will be identified as "minimally acceptable BMP conditions for ORV routes on Drummond Island". It is recommended that representatives from the Forest Management Unit (FMFM, WLD, FSH, and LED), ORV Trails Analyst, District Recreation Specialists, and Lansing Recreation/Trails Program staff serve on a committee to draft a set of acceptable standards. This should be accomplished by July 1.

4) Planning and Biodiversity (WI 1.3 and 1.4):

- A) **FSC CAR 2008.1:** a) The DNR must pursue every opportunity to accelerate the biodiversity conservation planning process (BCPP) and provide SCS with a detailed timeline of key milestones in the process. b) The DNR must dedicate adequate resources to support the three key planning initiatives (BCPP, Regional State Forest Management Plans, Eco-Regional Plans). Clearly, a significant element of this will be addressing the planning staff vacancy in the EUP region. *Deadline: Part a) February 1, 2009. Part b): Surveillance audit 2009*

AND

Statewide NCR Number 2008-1: Staff involved in development of the Regional State Forest Management Plans have indicated that they will not be completed by the December 2008 deadline and approved in early 2009.

Corrective Action:

- The Statewide planning team, Statewide Biodiversity Team, and the three Eco-Teams will work together to draft a timeline of key milestones by February 15, 2009 – the Forest Certification Planning Specialist will lead.

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.

- East UP: FMFM has hired a limited term planner for two years. Fisheries Division was in the process of hiring a new Fisheries Manager but have now stopped that effort due to a hiring freeze in Fish & Game funded positions. The WLD Ecologist is back full time in her current position.
- In order to incorporate appropriate opportunity for stakeholder involvement and to integrate the Biodiversity Conservation Planning Process into the RSFMP process, new timelines for plan completion have been proposed and approved by the Statewide Council.
 - Ecoteam and SWC Review & Approval of Biodiversity Stewardship Areas (BSAs): NLP by Sept 2009, WUP by Nov 2009, and EUP by Jan 2010.
 - Submit RSFMP for Final Public Review & Director's Decision: NLP by Oct 2010, WUP by Dec 2010, and EUP by Feb 2011.
- Forest Certification Work Instruction 1.3 will be re-written to reflect the new timelines and procedures and reference a new DNR policy when the policy is approved.

- B) **OFI SFI-2008.01:** SFI Indicator 1.1.2 requires “Documentation of annual harvest trends in relation to the sustainable forest management plan.” There is an opportunity to improve the information in management plans regarding planned harvest levels.

Corrective Action: The RSFMPs will utilize the Management Area (MA) concept which includes description of current conditions and identification of desired future conditions for each MA. Harvest trends will be part of this process and monitoring protocols to track progress will be outlined in the RSFMPs. Progress toward achieving desired future

conditions and harvest trends will be evaluated on a 5-year plan interval as part of the planning process. Annually, overall direction will be critiqued as part of the compartment review process.

C) In order to improve stakeholder notification and consultation as part of the Compartment Review Process:

- EcoTeam Chairpersons will coordinate and ensure an ecoregional contact list is updated annually, preferably before units start the public review process. The ecoregional contact list will be used by FMFM Managers to update their compartment review/open house notification lists. Compartment Review open house notifications should include: county offices, township offices, members of present and/or past DNR advisory groups, local environmental groups, local sportsmen clubs/organizations, recreational organizations and groups, timber sale contractors that receive local timber sale prospectuses, tribal representatives, and persons expressing interest in receiving notices. (This will be standard among Forest Management Units (FMUs); the FMUs can add others if so desired or drop those that make the request).
- The DNR should expand its internet site so that specific locations within a county can be selected and viewed in order to determine year-of-entry of compartments. In other words, individuals can zoom in to locate an area of interest, and determine when nearby state property will be inventoried and when treatments will be prepared.

5) Biomass Harvesting Guidance (WI 1.4)

OFI SFI-2008.02: SFI Indicator 2.3.6 requires “Criteria that address harvesting and site preparation to protect soil productivity.” There is an opportunity to improve by completing biomass harvesting guidelines.

AND

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. Auditor comments: At the time of the audit, MI DNR did not present the auditors with such a document and, at the time of the 2008 surveillance audit, completion of the Guidelines had not yet occurred. As such, this recommendation will continue to be monitored and carried over to the 2009 surveillance audit.

Corrective Action (*Continuing from 2008 but with new completion date*): 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 2009 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.

6) DNR approval process for Intrusive Activities (WI 3.1)

- A) **OFI SFI-2008.03:** Indicator 2.2.6 requires “Use of best management practices appropriate to the situation; for example: adjoining landowners or nearby residents notified of applications and chemicals used; appropriate multi-lingual signs or oral warnings used; public road access controlled during and after applications; streamside and other needed buffer strips appropriately designated; positive shut-off and minimal drift spray valves used; drift minimized by aerially applying forest chemicals parallel to buffer zones; water quality monitored or other methods used to assure proper equipment use and stream protection of streams, lakes and other water bodies; chemicals stored at appropriate locations; state reports filed as required; or methods used to ensure protection of federally listed threatened & endangered species.” There is an opportunity to improve consistency of paperwork and required notifications involving chemical use.

Corrective Action:

- *(Continuing from 2008)*: 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.
- Revise the Intrusive Activity Approval Procedure (see Appendix D) to take into account current procedures, including those listed in IC 4123. It is recommended that the Forest Certification Team appoint a review team with representation from FMFM, WLD, FSH, LED and the Departments Tribal Coordinator to refine the Intrusive Activity Procedure and IC 4123. This is a priority issue for the Management Review Team and prompt attention to this item is requested.

7) BMPs and RDRs (WI 3.1 & 3.2)

OFI SFI-2008.04: Indicator 3.1.4 requires “Monitoring of overall BMP implementation.” There is an opportunity to improve the consistent use of the Resource Damage Report (RDR) process.

Corrective Action (continuing from 2008):

1. Refine the Resource Damage Report (RDR) data base system and ...to make it more useable and consistent in quality. A new RDR data base system is in a testing phase and is expected to be completed by early March with rollout expected in the second quarter of this calendar year. The FMFM GIS Unit Leader is the lead on this, and will also coordinate the software training for DNR staff.
2. FMFM and WLD Field Coordinators will ensure training is implemented and available to all DNR staff on how to recognize reportable resource damage sites and clarify field protocols for reporting and tracking these sites.
3. It has been suggested and accepted that the FMFM Unit Manager assume the screening function for RDR reports submitted by all DNR employees. All employees should continue to be aware of the need to identify RDR's and prepare a report as appropriate, which will be submitted to the FM Unit Manager.

8) Research Summary (WI 5.1)

OFI SFI-2008.05: Indicator 4.2.2 requires “A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management

AND

Statewide NCR Number 2008-2: a) Each division did not compile a summary of research activities and expenditures. b) The summary had no description of development and implementation of research projects, nor was there a description of incorporation of findings into DNR activities and programs.

Corrective Action:

- Work Instruction 5.1 should be carefully reviewed and modified to better reflect SFI Objective 9 and FSC Indicator 8.1.c of the Standards. It seems reasonable that a list of projects, tracking of financial expenditures (not necessarily to be included in the research summary but it is needed for the SFI annual report), and on-line links (or contact person) to research projects completed in the previous year, would meet the spirit and letter of Objective 9.
- The research summary should include:
 - A list of research currently being sponsored (which includes research utilizing DNR staff time on project, Department funding, and/or permits issued for research related access to DNR land) by the Dept. that advances the concept of sustainable forestry.
 - a list of research projects completed in the previous year, with identification of a contact person and a link to the web site when possibleNote that a separate summary of expenditures will be compiled for reporting on the SFI annual report, but expenditures will not appear in the research summary report.
- Change WI 5.1 to specify a March 1 completion date for the Research Summary.

9. Timber Sale Program (W.I. 7.)

Statewide NCR Number 2008-3: Generally, staff are doing a good job of documenting their site visits, 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 on a consistent basis. The checklist portion of form R 4050 is often not completed; documentation of SFE trained foreman sometimes not provided; and often there is no documentation of pre-sale meeting.

Corrective Action:

- (Continuing from 2008): Instruct field staff to complete an R4050 form for each payment unit and comply with the work instruction on reporting requirements.
- The FMFM Field Coordinators will appoint a committee by March 15 to revisit Work Instruction 7.1 and form R4050. Proposed members of the committee will include the Forest Certification Specialist, Division Timber Sale Specialist, a District Supervisor, a Unit Manager, a Wildlife Division representative, and other FMFM field staff; completion date will be August 1, 2009

10. Staff Training (W.I. 5.1, 1.3, 8.1)

Statewide NCR Number 2008-4: FSD and WLD do not follow the structured process outlined in Work Instruction 8.1; FSD does not annually summarize training needs nor does FSD determine annual training plan for division employees; FSD and WLD do not annually assess gaps in training; FSD and WLD supervisors do not send Training Officer the annual list of training needs; FSD and WLD Training Officers observe that employee training records are only as good as the information received from staff: some staff do not attend trainings for which they are registered; some staff do not sign-in at trainings they did attend; some staff attend courses, workshops or conferences (not handled through the training officer) and do not inform training officer of training.

Corrective Action: The FCT recommends that revision to the work instruction occur, and it should incorporate the actual process used by each division. The Departments Training Advisory Team (TAT) and the training officers/coordinators are ideally positioned to help resolve this NCR. They are the individuals responsible for implementing training and they have an established work group already familiar with department-wide training. The TAT in coordination with the FCT may be the most logical group to redraft the WI, and the training officers/coordinators would be the best individuals to redraft their respective division's training procedures (if necessary).

The management review team agreed that the FCT will work in conjunction with the TAT to redraft WI 8.1. The FMFM Forest Certification Specialist will contact the TAT and get this issue placed on their agenda.

11. Forest Regeneration (W.I. 2.1)

(Continuing 2008): 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 the Program Manager for GIS and Spatial Analysis, USFS, Forest Health Technology Enterprise Team for 2-3 days. (MR07)

The FMFM Forest Health, Inventory, and Monitoring Unit Leader is leading an effort to accomplish this task in 2009.

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

- Work Instruction 3.3 should be revisited to include additional detail and information in regard to the road closure process.
- A review group will be appointed by the Forest Certification Team to address this issue. The Team should include members of each EcoTeam, along with Land Specialists from FMFM and WLD. The revised Work Instruction 3.3 should include requirements for tribal notifications.
- The FMFM Management Team shall clarify the procedure for tribal notifications of road closures related to the 2007 Inland Consent Decree by June 1, 2009. The procedure shall be incorporated into or referenced in Work Instructions 3.3 and 9.1.

- EcoTeams will prepare draft tribal notifications and related documentation on road closures and forward to the Department’s Statewide Tribal Coordinator. (Refer to 2007 Inland Consent Decree. Section 20.2, item (f), Appendix L, Section 14.5, and Appendix L, Section 18.1.)

13. Invasive Exotic Plants (W.I. 2.3)

The Management Review Team recommends that the pocket field guide for invasive exotic plant species produced by MNFI be rolled out to DNR field staff in order to improve awareness of the invasives issue. The FMFM and WLD Management Teams should become familiar with the MNFI work on invasives and determine how to roll out related information within their respective Divisions.

14. Work Instruction Revisions – Recommendations:

The FMFM Forest Certification Specialist will incorporate the following recommendations regarding changes to work instructions and forward to the FCT for concurrence, and then forward to the Department Management Teams and SWC for review and approval.

WI Recommendation for Revision or clarification of Work Instructions

1.1	None
1.2	None
1.3	Revise with new timelines and procedures.
1.4	User friendly direction is needed for coding of SCAs in OI and IFMAP. Outline ERA planning process
1.5	None
1.6	None
1.7	None
2.1	Incorporate revised regeneration survey procedures when completed
2.2	No change to chemical list at this time, wait until completion of FSC chemical derogation process.
2.3	None
3.1	Include a reference to the SF Resource Assessment Procedure 4123
3.2	None
3.3	Include additional details on procedure for road closures, include guidance on 2007 Inland Consent Decree requirements, and describe role of new PRCSF manager in role and responsibility section.
5.1	Modify to incorporate recommendations related to Statewide NCR 2008-2. Change WI to specify a March 1 completion date for the Research Summary
6.1	None
6.2	None
6.3	None
7.1	Update WI when appointed advisory group completes its work
7.2	None
8.1	The FCT recommends that the Training Advisory Team draft revisions to this work instruction to incorporate the actual process used by each division.
9.1	Update SHPO/OSA reporting requirements, and reference the 2007 Inland Consent Decree and IC 4123 (State Forest Land Resource Assessment Procedure).

Appendix A:



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 2008-1
Author: Dennis Nezych	Lead Audit Team: Michael Donovan, Jim Ferris, Les Homan , Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/08	Work Instruction or Standard and Clause Number: 1.3 Regional State Forest Management Plan Development	
Other Documents (if applicable): <ul style="list-style-type: none"> Internal Audit NCRs 11-2008-01, 54-2008-2, 52-2008-03. 45-2008-01 Regional planning timeline Management Review Report 1-17-08 		Responsible Manager(s): Statewide Council and Division Management Teams
REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION: <u>1) Work Instruction 1.3:</u> <ul style="list-style-type: none"> The Regional State Forest Management Plans will be completed in 2008 following approval of the State Forest Management Plan. <u>2) Management Review Report 1-17-08:</u> <ul style="list-style-type: none"> 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. <u>3) Regional State Forest Plan Timeline, February 5, 2008:</u> <ul style="list-style-type: none"> Submit Final Draft To SWC for Action: WUP - Dec 08, EUP - Jan 09, NLP – Nov 08. Submit Plan for Director's decision - NRC Action: WUP - Feb 09, EUP - March 09, NLP – Jan 09. 		
OBSERVED NONCONFORMITY: Staff involved in development of the Regional State Forest Management Plans have indicated that they will not be completed by the December 2008 deadline and approved in early 2009.		
ROOT CAUSE ANALYSIS (Describe the cause of the problem): <ul style="list-style-type: none"> Eastern UP: Too little staff. Planner is on active military duty, and is in his forth year. Fisheries had a vacancy that left us short-handed. Wildlife recently assigned the ecologist to acting duties in another role. July and August 2008 – SWC considered and then approved modified RSFMP timelines at stakeholder request to provide an opportunity for public stakeholder involvement in formulating preliminary concepts of management for each MA October 2008 – Based upon stakeholder request and internal support, the DNR SWC approved revised RSFMP timelines to integrate the Biodiversity Conservation Planning Process into the RSFMP process. 		
CORRECTIVE ACTION (Recommended - Proposed corrective action). <ul style="list-style-type: none"> In order to incorporate appropriate opportunity for stakeholder involvement and to integrate the Biodiversity Conservation Planning Process into the RSFMP process, new timelines for plan completion have been proposed and approved by the Statewide Council. <ul style="list-style-type: none"> Ecoteam, SBT, PAT and SWC Review & Approval of EUP BSAs: NLP by Sept 2009, WUP by Nov 2009, EUP by Jan 2010. Submit Plan for Final Public Review & Director's Decision - NRC Info: NLP by Oct 2010, WUP by Dec 2010, EUP by Feb 2011. Forest Certification Work Instruction 1.3 will be re-written to reflect the new timelines and procedures and reference to a new DNR policy will be incorporated when the policy is approved. East UP: FMFM has hired a limited term planner for two years, until full time planner returns. Fisheries Division is in the process of hiring a new Fisheries Manager. The WLD Ecologist has relinquished her acting role in November. 		
CORRECTIVE ACTION PLAN ACCEPTED:	FCIT: Date December 8, 2008	



INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2008-2
Author: Dennis Nezych	Lead Audit Team: Michael Donovan, Jim Ferris, Les Homan , Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/08	Work Instruction or Standard and Clause Number: 5.1 Coordinated Natural Resource Management Research	
Other Documents (if applicable): Internal Audit NCRs 11-2008-06, 54-2008-4, 52-2008-08, 45-2008-03		Responsible Manager(s): FMFM Forest Health, Inventory, and Monitoring Unit Manager with assistance from the Research Coordinators for FSD, PRD, and WLD
REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION:		
<p><u>Work Instruction 5.1:</u></p> <ul style="list-style-type: none"> • “The research coordinators from each Division or Bureau must compile a summary of research activities and expenditures” • “The summary will describe development and implementation of research projects and incorporation of findings into DNR activities and programs.” 		
OBSERVED NONCONFORMITY:		
<ul style="list-style-type: none"> • Each division did not compile a summary of research activities and expenditures. • The summary had no description of development and implementation of research projects, nor was there a description of incorporation of findings into DNR activities and programs. 		
ROOT CAUSE ANALYSIS (Describe the cause of the problem.):		
<p>Research Coordinators have questioned whether Work Instruction 5.1 goes beyond the SFI Objective 9 by requiring a comprehensive report that results in spending additional preparation time, without additional resources identified to gather the information and prepare the report. SFI only requires a list of the projects and costs, and one can argue that Indicators for Performance Measures 9.1 and 9.2 require less.</p> <p>Annual and final reports, plus additional deliverables (e.g., workshops, manuscripts, theses) are generally required for any contractual work conducted by FMFM, and WLD. To provide details currently called for in Work Instruction 5.1 requires additional work and results in little added benefit. Research results and products are usually published, made available on-line, and/or presented to appropriate groups within the agency. The result is that appropriate individuals within the DNR are made aware of the results of the research when they are available. Some researchers are quite diligent about sharing their ongoing findings, even preliminary results, with field foresters and wildlife biologists and much of this reporting is required under contracts.</p>		

CORRECTIVE ACTION (Recommended – Proposed corrective action).

The process may be improved by having a standard and simplified reporting process detailed in the Work Instruction. Research reports are already formulated by various Divisions, so it seems reasonable to use those as evidence in support of SFI Performance Measures 9.1 and 9.2 rather than develop a new report.

It is important to define “research” more carefully. There are discrepancies between the Work Instruction and Objective 9 in regards to what constitutes research and what should be reported. A clear distinction needs to be made between research with direct DNR involvement and funding, and indirect DNR involvement (e.g., providing use permits for the site for the research, or only minor technical support).

A requirement that all research be reported to the research coordinator for each division/agency could make accumulation of the information, particularly if research that does not involve division/agency funding is to be reported, much more efficient and easily checked.

Work Instruction 5.1 should be carefully reviewed and modified to better reflect SFI Objective 9 and FSC Indicator 8.1.c of the Standards. It seems reasonable that a list of projects, tracking of financial expenditures (not necessarily to be included in the research summary but it is needed for the SFI annual report), and on-line links (or contact person) to research projects completed in the previous year, would meet the spirit and letter of Objective 9.

In Summary, the research summary should include

- **a list of research currently being sponsored (staff time, funding, access to SF land) by the Dept. that advances the concept of sustainable forestry.**
- **a list of research projects completed in the previous year, with identification of a contact person and a link to the web site when possible**
- **a separate summary of expenditures will be compiled for reporting on the SFI annual report**

CORRECTIVE ACTION PLAN ACCEPTED:

FCIT:

Date December 8, 2008

Follow Up Comments:



INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2008-3
Author: Dennis Nezych	Lead Audit Team: Michael Donovan, Jim Ferris, Les Homan , Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/08	Work Instruction or Standard and Clause Number: 7.1 Timber Sale Preparation and Administration Procedures	
Other Documents (if applicable): Internal Audit NCRs 11-2008-08, 54-2008-6, 52-2008-09		Responsible Manager(s): FMMF Managers at Unit and District levels
REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION: <u>7.1 Timber Sale Preparation and Administration Procedures:</u> "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,		
OBSERVED NONCONFORMITY: Generally, staff are doing a good job of documenting their site visits, 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 on a consistent basis. The checklist portion of form R 4050 is often not completed; documentation of SFE trained foreman sometimes not provided; and often there is no documentation of pre-sale meeting.		
ROOT CAUSE ANALYSIS (Describe the cause of the problem.): A final inspection report using Form R4050 is being completed when the timber sale is closed and the Timber Sale Completion Report is filed. However, documentation of regular inspections during the course of the sale has not been consistent, some using a locally designed form, and not form R4050 to record observations. There seems to be unwillingness on the part of many staff to utilize the form as specified in the work instruction. FMU staff often feel that using one form per visit or one form per unit is excessive, and would like to see the ability to use the same form for multiple visits and note which unit(s) is covered.		
CORRECTIVE ACTION (Recommended - Proposed corrective action). <ul style="list-style-type: none"> • Instruct field staff to complete an R4050 form for each payment unit and comply with the work instruction on reporting requirements. • Form R 4050 need to be revisited along with the portion of the work instruction dealing with timber sale inspection to ensure that the needs of the Department, the Forest Certification Standards, and of staff are met. 		
CORRECTIVE ACTION PLAN ACCEPTED:	FCIT: Date December 8, 2008	
Follow Up Comments:		



INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2008-4
Author: Mike Donovan	Lead Audit Team: Michael Donovan, Jim Ferris, Les Homan , Jeff Stampfly	
Date (mm/dd/yyyy): 11/20/08	Work Instruction or Standard and Clause Number: 8.1 Michigan Department of Natural Resources Staff Training for State Forest Management	
Other Documents (if applicable): Internal Audit NCRs 11-2008-09, 54-2008-7, 52-2008-11	Responsible Manager(s): Research leads – all Divisions FMFM Forest Resource Management Section	
<p>REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION:</p> <p><u>8.1 Michigan Department of Natural Resources Staff Training for State Forest Management</u></p> <ul style="list-style-type: none"> • “Training Officer annually summarizes training needs.” • “Training Officer “determines annual training plan for division employees and inform supervisor and employees.” • “Training Officer shall annually assess gaps in training” • “Supervisors send Training Officer the annual list of training needs” • “Supervisors and employees shall inform Training Officer of completion of all required training, and of any additional training completed.” 		
<p>OBSERVED NONCONFORMITY:</p> <ul style="list-style-type: none"> • FSD and WLD do not follow the structured process outlined in Work Instruction 8.1. • FSD does not annually summarize training needs nor does FSD determine annual training plan for division employees. • FSD and WLD do not annually assess gaps in training. • FSD and WLD supervisors do not send Training Officer the annual list of training needs. • FSD and WLD Training Officers observe that employee training records are only as good as the information received from staff: some staff do not attend trainings for which they are registered; some staff do not sign-in at trainings they did attend; some staff attend courses, workshops or conferences (not handled through the training officer) and do not inform training officer of training. 		
<p>ROOT CAUSE ANALYSIS (Describe the cause of the problem.):</p> <p>Each division currently has an identified process that works, but may be inconsistent with current work instructions.</p> <ul style="list-style-type: none"> • Fisheries Division has a training process that is effective and efficient through a centralized committee in Lansing whereby training needs are identified to each Supervisor and staff. While this process of employees requesting training and receiving training works for our needs within the Division; the process is inconsistent with Work Instruction 8.1. • Wildlife Division has a very similar and centralized process. A training plan is developed by staff and then reviewed/approved by the division management team. Once approved the training plan is provided to each management unit supervisor and staff and it is ultimately the responsibility of the MUS to ensure that his/her staff has received the necessary training. This process is also inconsistent with Work Instruction 8.1. • Although training officers/coordinators are aware of the existence of a work instruction related to training, the coordinators from LED, FD, and WLD apparently are not aware that it applied to divisions other than FMFM. • A Training Advisory Team (TAT) was established by a SWC charter in 1998 (DNR Policies & Procedures 21.08-10). The training officers/coordinators from each department are members of this team. The primary purpose of the TAT is to coordinate and recommend ways to improve department-wide training. The TAT and the training officers/coordinators outside of FMFM were not engaged in resolving NCRs. • There is a disconnect between the TAT and requirements of the work instruction. 		

CORRECTIVE ACTION (Recommended - Proposed corrective action).

This should be a discussion item for the annual management review session where a proposal for revising work instruction 8.1 should be reviewed. The FCT recommends that revision to the work instruction is occur, it should incorporate the actual process used by each division. The TAT and the training officers/coordinators are ideally positioned to help decide which of the two approaches should be taken to resolve this NCR. They are the individuals responsible for implementing training and they have an established work group already familiar with department-wide training. The TAT in coordination with the FCT may be the most logical group to redraft the WI, and the training officers/coordinators would be the best individuals to redraft their respective division's training procedures (if necessary).

CORRECTIVE ACTION PLAN ACCEPTED:

FCIT:

Date December 8, 2008

Follow Up Comments:

APPENDIX B

2009 Forest Certification Internal Audit Process 1-27-09

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 3rd 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 via notification by the responsible manager that corrective actions are complete and via verification by the responsible manager's supervisor and the Forest Certification Specialist.

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 ensure corrective actions are implemented.

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

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 C



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

STATE FOREST LAND RESOURCE ASSESSMENT ACTIVITIES PROCEDURE CHECKLIST

Issued by authority of Part 525, PA 451 of 1994, as amended.

The Michigan Department of Natural Resources (DNR) conducts a wide variety of activities on State Forest lands, from activities taken to modify the composition or structure of a forest stand (called forest treatments) to road and bridge construction projects, mineral leasing and development, or recreational facility improvement. Every time the Michigan DNR plans to conduct these kinds of activities on State Forest lands, it must go through a process that assesses how those proposed activities will impact the land. Members of the public and Michigan DNR staff who are interested in when, where and why these activities take place can learn detailed information about the particular process and where to get related information through Information Circular 4200 (IC4200).

The Michigan DNR staff should consult the following general procedure and checklist as a guide when proposing and initiating activities. Resource assessments for timber sale harvests and wildlife management activity are routinely included as part of the Michigan DNR compartment review process. Many other types of activities have unique procedures that Michigan DNR staff must follow.

General Procedure:

The following actions are conducted by the Michigan DNR to assess potential resource affects and document activities and observations. These actions apply to all proposed activities on **certified** State Forest land, with the exception of routine maintenance of roads and bridges and other facilities. Although most forest treatments go through a compartment review, some have an alternate process which is defined either by statute or by a special Michigan DNR Procedure.

Planning Checklist:

1. Check to make sure the proposed treatment fits within the goals and objectives of Michigan DNR management plans and guidance documents. Be sure to determine if a Special Conservation Area exists in the Geographic Decision Support Environment (GDSE).

Plans may include:

- Compartment review decisions (including pre-inventory meeting objectives)
- Wildlife Action Plan
- Off-Road Vehicle Plan
- Eco-Regional State Forest Management Plans
- Statewide Forest Management Plan
- Special Conservation Area plans
- Other local plans

Guidelines may include:

- Sustainable Soil and Water Quality Practices on Forest Land
- Forest certification work instructions
- Michigan DNR silvicultural guidelines
- Within-Stand Retention Guidelines (IC4110)
- Green-up guidelines (IC4371)
- "Michigan DNR Approach to the Protection of Rare Species" Guidance document (IC4172)

2. Check the Michigan Natural Features Inventory (MNFI) database for rare species. (Remember, if this database does not indicate an element occurrence, it may only mean that no rare species have been documented to date. It does not necessarily mean there are no rare species present in the area.)

Use the “Michigan DNR Approach to the Protection of Rare Species” Guidance document (IC4172) for determining whether rare species are present. In summary:

- Check the Michigan Natural Features Inventory (MNFI) database for potential areas of concern, but also consider potential habitat, local knowledge, and references. – (see Documentation Checklist in Guidance Document)
 - Review listed species biology and habitat needs
 - Determine if there are potential impacts to rare species.
 - Request technical assistance as needed.
 - Review any concerns with the Michigan DNR’s Endangered Species Coordinator as needed.
 - Request special surveys where staff has determined there is a high likelihood of finding a rare species within a proposed treatment area. – Utilize process for requesting a Rare Species Survey in Guidance document (IC4172). .
3. Check with the Department of History, Arts, and Libraries (HAL) to determine the significance of cultural resources that may exist within the proposed activities area.
 - Notify the Office of the State Archaeologist (OSA) when compartment review plans have been developed for a given year-of-entry so that HAL staff can review and provide comments prior to the compartment review.
 - For all compartment reviews and reviews of potential soil-disturbing activities, check the HAL CONCERNS database. HAL CONCERNS shows sections within each township that contain archaeological sites. If there are hits, consult HAL’s OSA. (Remember, if this database does not indicate a concern, it may only mean that no cultural resources have been documented to date. It does not necessarily mean there are no cultural resources present.)
 - Forward staff reports of cultural features to OSA using form PR 4440 (Archaeological and Cultural Sites Reporting Form) and consult with OSA for recommendations.
 - Contact HAL’s State Historic Preservation Office (SHPO) for all federally funded or assisted activities, OR for activities affecting structures such as buildings or bridges over 50 years old. Apply for Section 106 review using the application form available at www.michigan.gov/HAL. Allow a minimum of 30 days for a response from SHPO.
 - Request special surveys or other follow-up activities as recommended by OSA or SHPO.
 4. Conduct a preliminary meeting or other form of consultation among divisions within the Michigan DNR who are involved in developing, approving, or implementing treatments. (Note that the compartment review and/or using the Michigan DNR Intrusive Activities Approval Procedure can serve as a consultation mechanism.)
 5. Consultation with Tribes:
 - Notify tribal cultural resources staff from the 12 federally recognized Michigan Tribes in regard to actions on property of interest to their tribes. (This is routinely done as part of the compartment review process notification procedure.) Intrusive activities proposed and implemented outside of the compartment review process should be reviewed by the Tribal Coordinator of the division initiating the activity in order to determine the appropriateness of tribal notification. Allow a minimum of 30 days for a response.

- Notify Michigan Tribal Historic Preservation Officers (THPOs) of federally funded or federally assisted undertakings in areas of interest to their tribes. Division Tribal Coordinators and the Michigan DNR (within Wildlife Division) Federal Aid Coordinator are available to assist with notifications. Allow a minimum of 30 days for a response from THPOs.
 - The 2007 Consent Decree for the 1836 Treaty of Washington requires consultation and collaboration between the Michigan DNR and the Tribes prior to issuance of tribal permits for gathering on State Forest lands.
6. Gather input for the proposed activity from interested associations, advisory groups, interest groups and others. Compartment Review Open houses and internet postings are standard methods. Associations and advisory groups for major program areas are another, and typically include fire, recreation activities (e.g., motorized trail users, hunting interests), timber, wildlife and fisheries management interests.

The following impacts Wildlife activities and staff far more than FMFM: If the proposed activities involve a federal action (funding or other federal interest), Michigan DNR staff from the initiating division must notify the Michigan DNR's Federal Aid Coordinator (within Wildlife Division) who will make notifications and conduct consultations as required by the National Historic Preservation Act (NHPA). This is required because compliance with NHPA is required by the federal agency involved in the federal action. The Michigan DNR must therefore supply the federal agency with the necessary information required for the agency to document its compliance with NHPA. Allow a minimum of 60 days for a response. Ongoing and regular communication with Michigan DNR staff and appropriate federal staff should continue to ensure compliance with any regulation changes/updates.

Operations Checklist:

7. (a.) Prepare treatment proposals, and (b.) seek approval for the proposed treatment activity using appropriate Michigan DNR procedures.
8. Conduct treatments outlined in the field proposals using professional staff (e.g., Michigan DNR foresters/forest technicians and/or wildlife biologists/technicians). Forest treatments must correspond to forest inventory prescriptions. Follow Soil and Water Quality Guidelines.
9. Issue appropriate permit or contract (if applicable) to conduct treatments. This includes treatment specifications to protect environmental and archaeological/historic features.
10. Conduct and document field inspections while treatment activities are being carried out. File documented work with associated permit, contract, or proposal. Report any rare, threatened or endangered species or archaeological/historic features found during treatment activities.
11. Document completed activities or treatments and conduct final activity inspection to verify that activities have followed the planned and approved prescriptions.
12. Integrate treatment results into appropriate plans and databases.

Appendix D
Changes needing review by the Statewide Council (red print) to the Intrusive Activities Review and Approval Process as discussed at the January 27, 2009 Management Review Meeting

Intrusive Activity	FMFM Approval	Wildlife Approval	Fisheries Approval	Other
ALL Timber Sale Proposals Included at compartment review	Unit Manager. Timber Management Specialist (TMS) must act within 10 working days.	Wildlife Biologist	Unit Manager	
ALL Timber Sale Proposals Not included at compartment review	Unit Manager. District. Supervisor, TMS must act within 10 working days.	Wildlife Biologist Wildlife Sup.	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123 (include tribal notifications)
All Forest Treatment Proposals (FTP) for treatments included at compartment review. (Multiple treatments in decade only 1 time approval with annual Completion reports)	Unit Manager and TMS	Wildlife Biologist	Unit Manager	Treatments involving federal funds require review by the Department Federal Aid Coordinator (see IC 4123)
(FTP) Beaver, animal or dam removal not within cleared road ROW (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) for treatments not included at compartment review. (Multiple treatments in decade only 1 time approval with annual Completion reports)	Unit Manager and District Supervisor, and TMS	Wildlife Biologist and Wildlife Supervisor.	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123
Use Permit and Event Permits not involving earth or vegetation changes (Use PR 1138-1 and follow associated procedure)	Unit Manager If FMFM is the LAD – District Supervisor.	Wildlife Biologist If Wildlife is the LAD – District Supervisor.	Unit Manager if surface water within 500 feet If Fisheries is the LAD – Unit Supervisor.	LED District Supervisor
Use Permit and Event Permits involving earth or vegetation changes (Use PR 1138-1 and follow associated procedure)	Unit Manager If FMFM is the LAD – District Supervisor.	Wildlife Biologist If Wildlife is the LAD – District Supervisor.	Unit Manager if surface water within 500 feet If Fisheries is the LAD – Unit Supervisor.	Follow DNR Resource Assessment Procedure checklist, IC 4123 LED District Supervisor
Well Site Surface Use Permits issued per Department Procedure	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)	Follow DNR Resource Assessment Procedure checklist, IC 4123

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Changes needing review by the Statewide Council (red print) to the Intrusive Activities Review and Approval Process as discussed at the January 27, 2009 Management Review Meeting

Intrusive Activity	FMFM Approval	Wildlife Approval	Fisheries Approval	Other
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	Follow DNR Resource Assessment Procedure checklist, IC 4123
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 Follow DNR Resource Assessment Procedure checklist, IC 4123
Forest Road/ Trail Closure Proposal	Unit Manager, Dist Sup, Field Coordinator	Wildlife Biologist, District Sup	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123. LED Dist Sup, EcoTeam
Designated Recreation Trail Development Proposal (R 1862E)	Unit Manager, Dist Sup, Field Coordinator	Wildlife Biologist, District Sup	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123 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	Follow DNR Resource Assessment Procedure checklist, IC 4123 for new construction, LED Dist Sup, PRB Dist Sup, Field Coordinator