

Michigan Department of Natural Resources

Management Review Report

February 17, 2011

DNR Management Review Field Meeting

February 17, 2011

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Management Review Participants:

- FMD: FMD Field Coordinator: Bill O’Neill
UP and NLP District Supervisors: Debbie Begalle
Forest Resource Management Section Leader Bill Sterrett
Forest Planning and Operations Unit Leader Larry Pedersen
Forest Certification Specialist Dennis Nezich
Forest Certification Planner David Price
- WLD: Assistant Division Chief Doug Reeves
WLD Field Coordinator Penney Melchoir
UP and NLP Regional Supervisors Terry Minzey, Bob Doepker, Rex Ainslie
- LED Representative: Lt. Creig Grey
- FSHD Representative: Jim Waybrant
- RD Representative: Jim Dzelak

I Background

A. SFIS Objective for Management Review and Continual Improvement

FSC 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*.

SFI Performance Measure 20.1. *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.

DNR 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.

Focus 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. Review open NCRs from past internal audits.
- e. Identify needed revisions to work instructions.
- f. Identify other actions for continual improvement in management.

External Audits:

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). Annual SFI and FSC surveillance audits are required in order to maintain certification status. Certification was for a five year period, with the certificates expiring in December, 2010.

A Request for Proposals for re-certification of the State Forest system was advertised in the summer of 2010. A contract was awarded to NSF International Strategic Registrations in partnership with Scientific Certification systems, the same companies that conducted the original certification audit. A Recertification audit was conducted in October 2010, and certification certificates were renewed in December, 2010. Three SFI CARs and ten FSC CARs were issued during the recertification audit. Audit results are found on pages 5-13.

DNR Internal Audits:

DNR Work Instruction 1.2 specifies that internal audits be conducted annually. The Forest Management Units selected for audit in 2010 were Escanaba, Grayling, and Shingleton.

Based upon audit results, DNR lead auditors identified three “statewide” non-conformances (see Appendix B) that require attention during the 2011 Management Review.

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 timeline for review of Management Review Report (MRR) and proposed Work Instruction (WI) revisions:

- a) The FMD and WLD Field Coordinators agree on a draft Management Review Report which will be forwarded to the FMD, WLD, FSHD, LED, and RD Management Teams by March 1, 2011.
- b) Management Team comments on MRR due April 1, 2011 to Penney Melchoir who will review with the FCT Executive Committee.
- c) Send MRR and proposed WI revisions to Statewide Council for information by April 15, 2011 with approval desired by June 15, 2011.
- d) FMD District supervisors, WLD regional supervisors, and Fisheries Division Unit Managers will ensure implementation of management review decisions following approval by SWC.

Re-Certification Audit:

Both sets of forest certification standards were revised in 2010. The recertification audit involved a complete evaluation of all FSC and SFI forest certification indicators included in the newly revised SFI 2010-2014 Standard and newly revised FSC-US Forest Management Standard (v1.0). Additionally, the SFI and FSC auditors closely reviewed changes within DNR (e.g., staffing, budget, land acquisitions, planning documents) that are pertinent to certification.

This year's audit involved a five-member team: Dr. Robert Hrubes (lead auditor for FSC), Mike Ferrucci (lead auditor for SFI), Dr. Dave Capen (wildlife biologist, recently retired from University of Vermont), Paul Pingrey (recently retired FC Coordinator for Wisconsin), and Katie Fernholz (Executive Director of Dovetail Partners). Both Robert Hrubes and Mike Ferrucci have been involved with the DNR forest certification program since 2005.

Dennis Nezich, Penney Melchoir, Bill Sterrett, and Bill O'Neill accompanied the team during the entire audit. DNR staff involved during the audit are identified in the SFI and FSC audit reports.

The audit started October 18 in Lansing with program overviews, staff interviews, and the first of two public meetings. Auditors then moved to the field October 19 through 22. Six different Forest Management Units were visited, including: Gladwin, Grayling, Gaylord, Shingleton, Newberry, and Escanaba. A second public meeting was held in Newberry on October 21. A closing audit meeting was held on Monday, October 25 at the Marquette OSC.

Both lead auditors recommended re-certification with only minor CARs being issued along with a number of SFI opportunities for improvement and FSC observations. Recertification was awarded for another five year period under the FSC Standard and for a three year period under the SFI Standard (SFI recently changed from five-year to three-year certification cycle). Annual surveillance audits will continue to occur in order to verify continuing conformance to the standards.

Audit Results:

FSC CERTIFICATION DECISION (from pages 54 to 70 of the FSC audit report, except that DNRE was edited to read DNR):

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team hereby recommends that the Michigan State Forest lands as managed by the Michigan Department of Natural Resources be re-awarded for another 5-year period under FSC certification as a "Well-Managed Forest" subject to the corrective action requests stated in Section 5.2. Michigan DNR has demonstrated that their system of management is capable of ensuring adequate levels of conformance with the requirements of the FSC-US Forest Management Standard over the forest area covered by the scope of the evaluation. Michigan DNR has also demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.

FSC Minor Corrective Action Requests (CARs)

Nonconformity: MDNR has not made publicly available a statement that complies with National Indicator 1.6.a.	
Minor CAR 2010.1	Develop and make publicly available a written statement of commitment to manage the “in scope” state forestlands in conformance with FSC standards and policies, including the FSC-US Land Sales Policy.
Deadline	30 days after award of certification
Reference	FSC US National Standard, Indicator 1.6.a

Nonconformity: MDNR has not documented, in brief, the reasons for seeking partial certification that complies with National Indicator 1.6.a.	
Minor CAR 2010.2	Convey to SCS a document that, in brief, explains the reasons for seeking partial certification, referencing FSC-POL-20-002, describing the locations of other managed forest units, the natural resources found on the holdings being excluded from certification, and the activities planned for the excluded lands.
Deadline	30 days after award of certification
Reference	FSC US National Standard, Indicator 1.6.b

Nonconformity: MDNR’s consultation with native American tribes does not presently comply with National Indicators 3.3.a, 3.3.b, & 8.2.d.5.	
Minor CAR 2010.3	Review and revise methods for outreach to native American tribes with an aim at securing a higher level of response and collaboration, by employing more culturally appropriate consultative procedures.
Deadline	2011 annual surveillance audit
Reference	FSC US National Standard, Indicators 3.3.a, 3.3.b, 8.2.d.5

Nonconformity: Forest workers and DNR employees do not consistently demonstrate adherence to a safe work environment in the field.	
Minor CAR 2010.4	Design, implement and document actions to assure more consistent forest worker and DNR employee adherence to the DNR’s safety policies, guidelines and contract terms.
Deadline	2011 annual surveillance audit
Reference	FSC US National Standard, Indicator 4.2.b

Nonconformity: People who are subject to direct adverse effects of management operations are not being adequately apprised of relevant activities in advance of the action.	
Minor CAR 2010.5	Pursue measures to inform adjacent landowners of pending harvest or other site disturbing activities occurring at the boundary of State Forest property.
Deadline	2011 annual surveillance audit
Reference	FSC US National Standard, Indicator 4.4.c

Nonconformity: DNR does not presently have policies in place for assuring that all areas meeting the FSC definition of Type I and Type II Old Growth (see Glossary to the FSC US National Standard) are protected from harvest, while allowing for the exceptions stated in Indicator 6.3.a.3.	
Minor CAR 2010.6	Develop and implement policies assuring conformance with the old growth protection requirements contained in Indicator 6.3.a.3.
Deadline	2011 annual surveillance audit
Reference	FSC US National Standard, Indicator 6.3.a.3

Nonconformity: The MDNR retention guidelines do not assure adequate conformity with Indicators 6.3.f and 6.3.g.1. There is presently incomplete and inconsistent understanding by MDNR personnel of the Department’s retention guidelines.	
Minor CAR 2010.7	<ul style="list-style-type: none"> a) Revise the retention guidelines to assure that all trees meeting the FSC definition of “legacy tree” are protected from harvest (see Glossary to the FSC US National Standard). b) Revise the retention guidelines to assure that “habitat components and associated stand structures” are retained during harvest operations “in abundance and distribution that could be expected from naturally occurring processes” and that include the elements articulated in Indicator 6.3.f (a) & (b). For even-aged regeneration harvests and for salvage harvests, assure that “live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for purposes of restoration or rehabilitation.” c) Upon completing revisions to the retention guidelines, conduct training to assure consistent and accurate understanding by employees who implement the guidelines.
Deadline	2011 annual surveillance audit
Reference	FSC US National Standard, Indicators 6.3.f, 6.3.g.1 & 7.3.a

Nonconformity: Because the Department’s silvicultural guidelines are outdated for some cover types, silvicultural systems employed by MDNR do not assure that ecosystems present on the FMU will be sustained for the long term. Some field foresters are imprecise in their use of silvicultural terminology and concepts. Use of diameter limit harvests in bottomland hardwoods is not a generally accepted practice.	
Minor CAR 2010.8	Update outdated elements of the Department’s silvicultural guidelines. Conduct additional training to assure more consistent and complete understanding of silvicultural principles and terminology.
Deadline	2011 annual surveillance audit
Reference	FSC US National Standard, Indicator 7.1.1

Nonconformity: The collection of publicly available documents constituting the management plan for the lands managed by MDNR do not describe how species selection and harvest rate calculations are developed and how the method meets the requirements.	
Minor CAR	Develop as elements of the management plan a written description of the

2010.9	species selection and harvest rate calculation process, as required in Indicator 7.1.m.
Deadline	2011 annual surveillance audit
Reference	FSC US National Standard, Indicators 7.1.m & p

Nonconformity: The full array of results of monitoring activities undertaken on the “in scope” forestlands is not all publicly available. As well, the breadth and complexity of monitoring activities is such that results are not reasonably accessible to the public in the absence of a summary.	
Minor CAR 2010.10	MDNR must develop and make publicly available a summary of monitoring results covering the subject areas listed in Criterion 8.2. The summary must be periodically updated.
Deadline	2011 Annual Surveillance audit
Reference	FSC US National Standard, Indicator 8.5.a

FSC Observations (OBS)

OBS 2010.1	Eroding compensation received by DNR employees will further complicate the Department’s challenge of maintaining its stewardship of the state forestlands in the face of shrinking staffs and budgets.
Reference	FSC US National Standard, Indicator 4.1.a

OBS 2010.2	DNR should devote more effort at safety training for logging contractors and their employees. The requirement that one person per contractor have logger training is marginal, at best.
Reference	FSC US National Standard, Indicator 4.2.c

OBS 2010.3	Continued staff and budget reductions will strain the ability of DNR to maintain conformity to the certification standard.
Reference	FSC US National Standard, Indicator 5.1.a

OBS 2010.4	There is active collection of non-timber forest products and some of this actively is acknowledged to likely have a commercial component (e.g., morel collection and sale to buyers). MDNR could increase its level of attention to managing NTFP collection activities.
Reference	FSC US National Standard, Indicator 5.6.d

OBS 2010.5	The effects of high densities of deer in some regions and the associated impact on the natural species diversity in the forest, as well as the ability to adequately regenerate a productive forest, continues to be a concern expressed by stakeholders and some FMD foresters. A Cervid Herbivory Team was appointed to address this issue, but little progress has been made.
Reference	FSC US National Standard, Indicator 6.3.d

OBS 2010.6	There is an inconsistent level of attention being paid to invasive exotic species. The March 2009 Framework for Action needs to be followed up with tangible actions.
Reference	FSC US National Standard, Indicator 6.3.h
OBS 2010.7	There is an inconsistent level of understanding on the part of field personnel regarding the purpose of Biodiversity Stewardship Areas, especially whether or not (for some BSA's) their purpose is to serve as reference areas.
Reference	FSC US National Standard, Indicator 6.4.c
OBS 2010.8	The frequency and severity of ORV-related "RDRs" would be reduced by additional efforts to counter the unintended consequence of the ORV trail system—that they are vectors for unauthorized ORV activity that is causing resource damage.
Reference	FSC US National Standard, Indicator 6.5.a
OBS 2010.9	There is insufficient investment in road maintenance. This is likely to result in future non-conformities if surveillance audits reveal adverse environmental impacts from poor road maintenance.
Reference	FSC US National Standard, Indicator 6.5.d
OBS 2010.10	Overall management of the state forestlands would be enhanced by completing of the access plan.
Reference	FSC US National Standard, Indicator 6.5.d
OBS 2010.11	Although progress has been made in the past 5 years, DNR should maintain and enhance efforts to control and minimize adverse environmental impacts from unauthorized ORV activities.
Reference	FSC US National Standard, Indicator 6.5.g
OBS 2010.12	Conversion of natural forests such as hardwood stands to red pine, even if such stands are considered "off site," needs to be done in a manner that does not constitute a conversion to a plantation, as defined by the FSC. In such cover type conversions, efforts at maintaining hardwood elements and generally assuring a level of biodiversity above a traditional red pine row-planted stand, will help to avoid a finding that MDNR is engaging in conversion to "FSC plantations."
Reference	FSC US National Standard, Indicator 6.10.d
OBS 2010.13	While meaningful progress has been made in the regional state forest management planning process since the 2009 audit, the task remains highly complex and challenging and still not yet completed. Marshalling additional resources and, if need be, streamlining some of the procedures in order to complete all three regional plans by the time of the 2011 audit would be clearly advantageous.
Reference	FSC US National Standard, Indicator 7.2.a

OBS 2010.14	Logger training requirements are weak and do not include basic silviculture training.
Reference	FSC US National Standard, Indicator 7.3.a
OBS 2010.15	Draft elements of regional state forest management plans are being used without easily accessible opportunities for public review and comment prior to their use. While we acknowledge the rationale for doing so (the benefit of incorporating, for instance, new scientific information as it become available rather than waiting for an indefinite period of time for a plan to be completed), we note that such a practice, if not carefully limited, can reduce the degree to which the plan development process is consultative.
Reference	FSC US National Standard, Indicator 7.4.b
OBS 2010.16	Only 1 of 3 districts has completed a draft of Chapter 6 of the regional state forest management plans. Conformance to this Indicator will be enhanced if MDNR hastens the completion and implementation of monitoring protocols.
Reference	FSC US National Standard, Indicator 8.1.a
OBS 2010.17	MDNR's current inventory system is not in strong conformance with regard to the requirements in this Indicator pertaining to volumes and regeneration.
Reference	FSC US National Standard, Indicator 8.2.a.1
OBS 2010.18	There is uncertainty amongst some stakeholders who have been actively engaged in MDNR's biodiversity planning, including the identification of biodiversity stewardship areas, as to the compatibility of BSA designation on private lands with the requirements for partnership in the CFA program.
Reference	FSC US National Standard, Indicator 9.3.c
OBS 2010.19	In selection harvests where trees to be cut are marked with paint, DNR's interests would be better served if there were more diligent efforts to assure that the butts of cut trees are also clearly painted. Without clear butt marks, it is impossible to know, after the fact, if trees not marked for harvest were in fact cut.
Reference	FSC US National Standard, Indicator 5.3.a

SFI CERTIFICATION DECISION (from pages 5 to 8 of the SFI audit report, except that DNRE was edited to read DNR):

MDNR's SFI Program was found to be in conformance with the SFIS Standard. NSF-ISR determined that there were three minor non-conformances:

- Minor Non-Conformance SFI-2010-1
Stand-level retention does not consistently meet the written guidelines.

SFI Indicator 4.1.4: “Development and implementation of criteria, as guided by regionally appropriate best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees.”

- Minor Non-Conformance SFI-2010-2

Field foresters and biologists have not been made aware of information regarding climate change impacts, including information known to specialists.

SFI Indicator 15.3.2: “Program Participants are knowledgeable about climate change impacts on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional or local programs.”

- Minor Non-Conformance SFI-2010-3

Understanding of the Within-Stand Retention Guidelines and the accurate use of silviculture terminology are areas where training is not consistently sufficient to roles and responsibilities of land managers.

SFI Indicator 16.1.3: “Staff education and training sufficient to their roles and responsibilities.”

Michigan Department of Natural Resources has developed plans to address these issues. Progress in implementing these corrective action plans will be reviewed in subsequent surveillance audits.

Eleven opportunities for improvement were also identified, and included:

- There is an opportunity to improve documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document future activities”.
SFI Indicator 1.1.2 requires “Documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document past and future activities.”
- There is an opportunity to improve routine road maintenance.
SFI Indicator 2.3.3 requires “Use of erosion control measures to minimize the loss of soil and site productivity.”
- There is an opportunity to improve efforts to update the silviculture guidance documents.
SFI Indicator 2.3.5 requires “Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area.
SFI Indicator 2.4.2 requires “Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.
- There is an opportunity to improve road planning efforts.
SFI Indicator 2.3.7 requires “Road construction and skidding layout to minimize impacts to soil productivity and water quality.
- There is an opportunity to improve tactical (compartment) landscape-scale biodiversity planning (i.e. forest cover types, age or size classes, and habitats), by including an analysis of trends and conditions at the Management Area scale to supplement analysis currently

provided for each compartment, for the “ aggregated same year-of-entry compartments”, and at the Forest Management Unit scale.

SFI Indicator 4.1.5 requires “Program for assessment, conducted either individually or collaboratively, of forest cover types, age or size classes, and habitats at the individual ownership level and, where credible data are available, across the landscape, and take into account findings in planning and management activities.

- There is an opportunity to improve the approach to prevention of invasive plant species.
SFI Indicator 4.1.7 requires “Participation in programs and demonstration of activities as appropriate to limit the introduction, impact and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plant and animal communities.
- There is an opportunity to improve aesthetic considerations on lands adjacent to homes and cabins.
SFI Indicator 5.1.2 requires “Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.
- There is an opportunity to improve the program to monitor information generated from regional climate models on long-term forest health, productivity and economic viability.
SFI Indicator 15.3.1 requires “Where available, monitor information generated from regional climate models on long-term forest health, productivity and economic viability.
- There is an opportunity to improve support for logger training.
SFI Performance Measure 16.2 requires “Program Participants shall work individually and/or with SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community to foster improvement in the professionalism of wood producers.
- There is an opportunity to improve the Program that includes communicating with affected indigenous peoples to enable Michigan Department of Natural Resources to identify and protect spiritually, historically, or culturally important sites.
SFI Indicator 18.2.1 requires “Program that includes communicating with affected indigenous peoples to enable Program Participants to: b. identify and protect spiritually, historically, or culturally important sites.
- There is an opportunity to improve protection of regeneration from adverse effects of deer on natural regeneration.
SFI Indicator 2.1.3 requires “Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both planting and natural regeneration.”

These findings do not indicate a current deficiency, but served to alert Michigan Department of Natural Resources to areas that could be strengthened or which could merit future attention.

NSF-ISR also identified the following areas where forestry practices and operations on MDNR's lands exceed the basic requirements of the SFI Standard:

- The program to protect threatened and endangered species exceeds the requirements.
SFI Indicator 4.1.2 "Program to protect threatened and endangered species."
- Public recreation opportunities are high-quality, diverse, and widely available.
SFI Indicator 5.4.1: "Provide recreational opportunities for the public, where consistent with forest management objectives."
- Michigan Department of Natural Resources has a Forest Certification Action Team, an active working group drawn from across the Michigan DNR with assignments for all SFI Performance Measures and Indicators, and a dedicated Forest Certification Specialist.
SFI Indicator 16.1.2 "Assignment and understanding of roles and responsibilities for achieving SFI 2010- 2014 Standard objectives."
- Michigan Department of Natural Resources program of certification related management review is exemplary.
SFI Indicator 20.1: "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."

The audit team commends the Michigan Department of Natural Resources for these exemplary practices, and for the fine work done throughout the organization to ensure that the lands under its stewardship are sustainably managed.

Statewide non-conformances from the 2010 internal audits (see Appendix A 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 three internal audits conducted in 2010, 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	None	
1.2	2	Mgt review decisions not implemented in regard to conducting cervid herbivory study (2).
1.3	2	RSFMPs will not be completed per approved time line (2)
1.4	2	Lack of follow up on ERA plans not accepted or approved at compartment review (1). Forest inventory lacked management recommendations for SCAs (1). T&E species not reported to Endangered Species Coordinator (1)
1.5	1	FMU web page does not link to compartment review summaries (1)
1.6	None	
1.7	None	
2.1	1	N. Hardwood stands improperly coded for thinning vs. selection cut (1)
2.2	None	
2.3	None	
3.1	2	Completed FTPs not entered into forest inventory data base (1). FTPs not prepared for completed forest treatment (2).
3.2	None	
3.3	None	
5.1	1	Field research being conducted on state land not recorded in research summary (1)
6.1	None	
6.2	1	Campground shortcomings ID'ed in inspection were not addressed (1)
6.3	None	
7.1	1	Loggers were not wearing hardhats while working outside of the equipment (1). DNR staff not wearing appropriate PPE on active logging site (1).
7.2	2	Issues regarding timber sale specs as they relate to biomass harvesting practices (1). Memorials on state land that are not being reported or addressed (1).
8.1	2	Staff training needs not ID'ed as part of performance appraisal process (1). Lansing training records not up to date (1).
9.1	None	

II. Decisions, direction, responsibility and time lines

1. Clarify the scope of certification:

FSC CAR 2010.1	Develop and make publicly available a written statement of commitment to manage the “in scope” state forestlands in conformance with FSC standards and policies, including the FSC-US Land Sales Policy.
Corrective Action	Statement from the Director has been posted on the DNR internet site following review and approval by the FMD Chief and DNR Director. This CAR was closed on February 22, 2011.

FSC CAR 2010.2	Convey to SCS a document that, in brief, explains the reasons for seeking partial certification, referencing FSC-POL-20-002, describing the locations of other managed forest units, the natural resources found on the holdings being excluded from certification, and the activities planned for the excluded lands.
Corrective Action	An interim response was drafted by the Forest Certification Specialist assisted by FRM Section in Lansing, and was sent to R. Hrubes on 2-24-11. The deadline for completion of this CAR was extended to March 31, 2011 to allow time to complete an analysis of the out-of-scope State Game and Wildlife Management Areas.

2. Management Review (WI 1.2):

- FMUs to internally audit in 2011 include:
 W UP District: Crystal Falls
 E UP District: Newberry
 W NLP District: Traverse City
- There is a need to recruit and train new internal auditors this year.
- No changes are being made to the internal audit procedures this year.

3. ORV Program:

FSC OBS 2010.8	The frequency and severity of ORV-related “RDRs” would be reduced by additional efforts to counter the unintended consequence of the ORV trail system—that they are vectors for unauthorized ORV activity that is causing resource damage.
FSC OBS 2010.11	Although progress has been made in the past 5 years, DNR should maintain and enhance efforts to control and minimize adverse environmental impacts from unauthorized ORV activities.
Response	DNR and partners are and will maintain efforts to encourage appropriate use of our ORV system.

4) Planning (WI 1.3):

FSC CAR 2010.9	Develop as elements of the management plan a written description of the species selection and harvest rate calculation process, as required in Indicator 7.1.m.
Corrective Action	Written description of the species selection and harvest rate calculation process will be described in the Timber Harvest Trends Report. FRM unit leader to complete by June 1. This, along with other publicly available documents constituting the MDNR management plans (especially the Regional State Forest Management Plans and STATE FOREST LAND RESOURCE ASSESSMENT ACTIVITIES, IC 4200) meet the requirements of indicator 7.1.m.

FSC CAR 2010.10	MDNR must develop and make publicly available a summary of monitoring results covering the subject areas listed in Criterion 8.2. The summary must be periodically updated.
Corrective Action	Create a singular document on the management planning web page that links to forest monitoring information, including the annual legislative timber harvest report. The Monitoring document would not duplicate other portions of the website. It would provide links to the location of monitoring reports that are logically posted on their relevant webpage. FC Planner to lead effort and complete prior to the Oct 2011 surveillance audit.

Statewide NCR 2010.2	RSFMPs will not be completed per approved time line.
FSC OBS 2010.13	While meaningful progress has been made in the regional state forest management planning process since the 2009 audit, the task remains highly complex and challenging and still not yet completed. Marshalling additional resources and, if need be, streamlining some of the procedures in order to complete all three regional plans by the time of the 2011 audit would be clearly advantageous.
Corrective Action	A revised strategy for completion of the RSFMPs is necessary by the SWC considering the fact that the BSA process is significantly delayed. Continued progress is expected and will be monitored and documented for auditors.

FSC OBS 2010.15	Draft elements of regional state forest management plans are being used without easily accessible opportunities for public review and comment prior to their use. While we acknowledge the rationale for doing so (the benefit of incorporating, for instance, new scientific information as it become available rather than waiting for an indefinite period of time for a plan to be completed), we note that such a practice, if not carefully limited, can reduce the degree to which the plan development process is consultative.
Response	No response necessary.

FSC OBS 2010.16	Only 1 of 3 districts has completed a draft of Chapter 6 of the regional state forest management plans. Conformance to this Indicator will be enhanced if MDNR hastens the completion and implementation of monitoring protocols.
Response	Draft document is complete and will be used in all three plans. Auditors will receive an update at the next surveillance audit.

FSC OBS 2010.17	MDNR's current inventory system is not in strong conformance with regard to the requirements in this Indicator pertaining to volumes and regeneration.
Response	Timber sale proposals, regeneration tracking procedures and forest inventory system provides required information. Select staff need training on how various data sources contribute toward meeting this indicator.

SFI OFI 2010-1	There is an opportunity to improve documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document future activities.
Response	Forest Harvest Trends report will be updated prior to next surveillance audit. See FSC CAR 10 regarding making this information publicly available.

<i>Continuing from 2010</i>	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.
Recommendation	The Resource Assessment Unit (RAU) has developed a prototype. The RAU will finish this WEB interface as soon as possible after DTMB has completed their upgrade.

5) Biodiversity (WI 1.4)

FSC CAR 2010.6	Develop and implement policies assuring conformance with the old growth protection requirements contained in Indicator 6.3.a.3.
Corrective Action	FRM Section must develop guidance on how to manage Type 1 and Type 2 OG. (Work with FSC and SCS during this process.)

FSC CAR 2010.7	<ul style="list-style-type: none"> a) Revise the retention guidelines to assure that all trees meeting the FSC definition of "legacy tree" are protected from harvest (see Glossary to the FSC US National Standard). b) Revise the retention guidelines to assure that "habitat components and associated stand structures" are retained during harvest operations "in abundance and distribution that could be expected from naturally occurring processes" and that include the elements articulated in Indicator 6.3.f (a) & (b). For even-aged regeneration harvests and for salvage harvests, assure that "live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for purposes of restoration or rehabilitation." c) Upon completing revisions to the retention guidelines, conduct training to assure consistent and accurate understanding by employees who implement the guidelines.
SFI CAR 2010-1	Stand-level retention does not consistently meet the written guidelines.

Corrective Action	A within stand retention committee will address this issue. This committee must complete its recommendations with respect to clarifying and simplifying the guidelines, including addressing Legacy trees and (FSC's) Type 1 & 2 Old Growth by July, 2011. This will be followed by training of staff.
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FSC OBS 2010.12	Conversion of natural forests such as hardwood stands to red pine, even if such stands are considered “off site,” needs to be done in a manner that does not constitute a conversion to a plantation, as defined by the FSC. In such cover type conversions, efforts at maintaining hardwood elements and generally assuring a level of biodiversity above a traditional red pine row-planted stand, will help to avoid a finding that MDNR is engaging in conversion to “FSC plantations.”
Response	RSFMPs and within stand retention guidance address this issue.

FSC OBS 2010.18	There is uncertainty amongst some stakeholders who have been actively engaged in MDNR’s biodiversity planning, including the identification of biodiversity stewardship areas, as to the compatibility of BSA designation on private lands with the requirements for partnership in the CFA program.
Response	Staff guidance has been provided by the FMD Chief. We are continuing to engage stakeholders and addressing specifics of where and how plans for CF lands may not be compatible with either CF requirements and/or BSAs.

SFI OFI 2010-5	There is an opportunity to improve tactical (compartment) landscape-scale biodiversity planning (i.e. forest cover types, age or size classes, and habitats), by including an analysis of trends and conditions at the Management Area scale to supplement analysis currently provided for each compartment, for the “ aggregated same year-of-entry compartments”, and at the Forest Management Unit scale.
Response	Complete the MA guidance portion of the RSFMPs, initiate public review and then incorporate a management area analysis into the compartment review process.

<i>Continuing from 2010</i>	The Vegetative Management Team shall update within-stand retention guidelines as necessary to comply with new woody biomass harvesting guidance.
Recommendation	The within stand retention committee shall ensure that guidelines are compatible with woody biomass harvesting guidance. Target date for completion is July, 2011.

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

Statewide NCR 2010.3	FTP completion reports not prepared and information for completed FTPs not entered into forest inventory data base.
<i>Continuing from 2008, 2009, & 2010</i>	In coordination with other DNR Divisions, the FMD 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.
Recommendation	The FTP process (and the new IFMAP activity tracking process that will replace it) needs to be documented and distributed to staff along with training by the FRM Section by October, 2011. WI 3.1 will need to be updated to reflect the new

	activity tracking process. Staff need to routinely document completion of treatments and District Supervisors need to follow up and ensure implementation per work instructions and previous management review guidance.
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<i>Continuing from 2009 & 2010</i>	Revise the Intrusive Activity Approval Procedure to take into account current procedures, including those listed in IC 4123, the Resource Assessment Procedure Checklist. It is recommended that the Forest Certification Team appoint a review team with representation from FMD, WLD, FD, LED and the Department's 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.
Recommendation	Recommended revisions are found in Appendices D and E.

7) BMPs and RDRs (WI 3.1 & 3.2)

<i>Continuing from 2009 & 2010</i>	An updated automated RDR data base was developed and is in place. FMD, WLD, FD, & LED Field Coordinators will ensure training is implemented and available to all DNR staff on how to recognize reportable resource damage sites and to clarify field protocols for reporting and tracking these sites. DNR staff will be trained in identification of RDRs and use of the RDR reporting and tracking system by Oct 1, 2010.
Recommendation	Training of new staff is a continuing need.

8) Research (WI 5.1)

SFI CAR 2010-2	Field foresters and biologists have not been made aware of information regarding climate change impacts, including information known to specialists.
SFI OFI 2010-8	There is an opportunity to improve the program to monitor information generated from regional climate models on long-term forest health, productivity and economic viability.
Corrective Action	Relevant communications will be made available to all staff. This will be shared through the S & R team back to Districts and Unit staff and through the Forest Resource Management Section. Should clear implications for changes in operations be perceived (e.g. prescriptions, etc.), these will be incorporated into cross-division communications and discussed at pre-inventory meetings. In addition, Wildlife Division has appointed a staff position to focus on Climate Change issues and keep staff up to date. Information may also be posted on the DNR internet. We have also applied for a S&PF Competitive Grant to hire a staff person on this issue.

<i>Continuing from 2010</i>	The State Silviculturalist will work with the Vegetative Management Team and DIT (if necessary) to develop a silvicultural field experiment directory for DNR staff by Oct 1, 2010.
Recommendation	Needs to be completed by October, 2011.

9. Timber Sale Program (WI 1. 7)

FSC CAR 2010.4	Design, implement and document actions to assure more consistent forest worker and DNR employee adherence to the DNR's safety policies, guidelines and contract terms.
Corrective Action	Communication will be provided by the FRM section regarding enforcement of PPE requirements on logging contracts, including those held by sole proprietorships and partnerships, by April 2011. MIOSHA PPE requirements will be enforced on all contracts.

FSC CAR 2010.5	Pursue measures to inform adjacent landowners of pending harvest or other site disturbing activities occurring at the boundary of State Forest property.
Corrective Action	Develop interactive web site maps whereby the public can view proposed timber sale contract areas and determine whether treatments are located next to their private property. The FRM section will lead the effort and complete prior to the next surveillance audit. Once functional, market the web site.

FSC OBS 2010.2	DNR should devote more effort at safety training for logging contractors and their employees. The requirement that one person per contractor have logger training is marginal, at best.
FSC OBS 2010.14	Logger training requirements are weak and do not include basic silviculture training.
SFI OFI 2010-9	There is an opportunity to improve support for logger training.
Response	DNR will work through the Forest Certification Specialist with SIC to improve logger training opportunities.

OBS 2010.19	In selection harvests where trees to be cut are marked with paint, DNR's interests would be better served if there were more diligent efforts to assure that the butts of cut trees are also clearly painted. Without clear butt marks, it is impossible to know, after the fact, if trees not marked for harvest were in fact cut.
Response	Issue to be addressed in silvicultural training to be conducted in 2011 and as an emphasis in future internal audits.

OFI 2010-7	There is an opportunity to improve aesthetic considerations on lands adjacent to homes and cabins.
Response	Revise Item #10 on Timber Sale Proposal Checklist. Also see FSC CAR 5 response.

10. Staff Training (WI 5.1, 1.3, 8.1)

FSC CAR 2010.8	Update outdated elements of the Department's silvicultural guidelines. Conduct additional training to assure more consistent and complete understanding of silvicultural principles and terminology.
SFI OFI 2010-3	There is an opportunity to improve efforts to update the silviculture guidance documents.
Corrective Action	DNR S & R Team will review current draft guidelines and finalize. Current set of guidelines to be posted on the DNR internet site for staff and public by the State Silviculturalist. FMD and WLD training on updated silvicultural guidelines will be developed and implemented by Dec 2011.

SFI CAR 2010-3	Understanding of the Within-Stand Retention Guidelines and the accurate use of silviculture terminology are areas where training is not consistently sufficient to roles and responsibilities of land managers.
Corrective Action	A review of existing silvicultural terminology will be conducted and appropriate updates made to definitions through the Forest Resource Management Section and S&R Team. Staff will be trained in forest management silvicultural definitions, including within stand retention guidelines.

FSC OBS 2010.7	There is an inconsistent level of understanding on the part of field personnel regarding the purpose of Biodiversity Stewardship Areas, especially whether or not (for some BSA's) their purpose is to serve as reference areas.
Response	Through the upcoming approval and public review process, more communications will be drafted and distributed to field personnel on this matter.

11. Forest Regeneration (WI 2.1)

Statewide NCR 2010-1	Management review decisions from 2007, 2008, 2009, and 2010 to conduct a statewide risk modeling project as a means to identify additional data needs for the study and evaluation of deer herbivory issues was not implemented.
SFI OFI 2010-11	There is an opportunity to improve protection of regeneration from adverse effects of deer on natural regeneration.
FSC OBS 2010.5	The effects of high densities of deer in some regions and the associated impact on the natural species diversity in the forest, as well as the ability to adequately regenerate a productive forest, continues to be a concern expressed by stakeholders and some FMD foresters. A Cervid Herbivory Team was appointed to address this issue, but little progress has been made.
<i>Continuing from 2007, 2008, 2009, & 2010</i>	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 (FHTET) for 2-3 days.
Response	The DNR Cervid herbivory team will implement the risk modeling project in 2011.

	<p>In response to that need, the USDA-FS, FHTET has recently created a program that can be used by knowledgeable state-level staff with minimal additional training from FHTET. This training can usually be accomplished over the phone in consultation with the FHTET facilitator. The logical FMD staff person to serve as a state-level facilitator the Forest Health Monitoring Program Leader of the FMD Forest Health Program. He is a leader in the development of the Forest Health Risk Map nationally and has interacted with the FHTET facilitator in this effort to a considerable degree. Extension of his knowledge to development of a cervid herbivory risk map is logical.</p> <p>The FMD Forest Health Program plans to provide that service to the Cervid Herbivory Team in 2011 to again move this process along to the next logical step. Commitment from FMD and WLD management to allow the assembling of the expertise needed to accomplish this task is also needed and will be sought for the 2011 FY.</p>
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12. Roads and Road Closures (WI 3.3)

FSC OBS 2010.9	There is insufficient investment in road maintenance. This is likely to result in future non-conformities if surveillance audits reveal adverse environmental impacts from poor road maintenance.
SFI OFI 2010-2	There is an opportunity to improve routine road maintenance.
Response	Recommend FMD appropriating \$14,000 in 2011 for road maintenance. Staff should continue to investigate alternate funding sources for road repairs. Additional funding to be requested as part of the 2012 budget.

FSC OBS 2010.10	Overall management of the state forestlands would be enhanced by completing of the access plan.
SFI OFI 2010-4	There is an opportunity to improve road planning efforts.
Response	DNR is seeking funds for a road mapping effort on State Forest lands. Even without this though, there is steady improvement in mapping of roads and addressing them (e.g. road closures) as part of the forest inventory process.

13. Invasive Exotic Plants (WI 2.3)

FSC OBS 2010.6	There is an inconsistent level of attention being paid to invasive exotic species. The March 2009 Framework for Action needs to be followed up with tangible actions.
SFI OFI 2010-6	There is an opportunity to improve the approach to prevention of invasive plant species.
Response	Training of staff. Provide auditors with information on the various workshops and training sessions the divisions have had in recent years. The DNR has obtained federal grants which will enable filling 2 limited term positions in WD. NOMAD

	application developed by FMD. Federal Grants being used to do surveys on three ERA areas to find and remove invasive plant species. Invasive species are being addressed in the RSFMP process.
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14. Tribal (WI 9.1)

FSC CAR 2010.3	Review and revise methods for outreach to native American tribes with an aim at securing a higher level of response and collaboration, by employing more culturally appropriate consultative procedures.
SFI OFI 2010-10	There is an opportunity to improve the Program that includes communicating with affected indigenous peoples to enable Michigan Department of Natural Resources to identify and protect spiritually, historically, or culturally important sites.
Corrective Action	Department and FMD tribal coordinators monitor issues that may significantly affect tribal resources and will initiate one-on-one contact where appropriate. Tribal contacts will be documented for 2011. Division Tribal Coordinators will remind staff about record keeping requirements.

15. Chemical Use (WI 2.2)

No Issues

16 Other

FSC OBS 2010.1	Eroding compensation received by DNR employees will further complicate the Department's challenge of maintaining its stewardship of the state forestlands in the face of shrinking staffs and budgets.
Response	No action possible

FSC OBS 2010.3	Continued staff and budget reductions will strain the ability of DNR to maintain conformity to the certification standard.
Response	Acknowledged.

FSC OBS 2010.4	There is active collection of non-timber forest products and some of this actively is acknowledged to likely have a commercial component (e.g., morel collection and sale to buyers). MDNR could increase its level of attention to managing NTFP collection activities.
Response	Where commercial activities are observed or known to occur, staff address the activity through requiring fees or permits and/or enforcement action.

17. Work Instruction Revisions – Recommendations:

The FMD 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

1.3	A new revised strategy and an extended timeline for completion of the RSFMPs are needed from the SWC.
1.4	Update BSA definitions. Integrate type 1 and type 2 Old Growth into work instructions. Revise coding instructions. Include direction in regard to tracking within stand retention.
5.1	Need to include the role of field staff in reporting newly discovered or permitted research, and identify responsibility for processing a request for research.
7.1	Update references to list Michigan Woody Biomass Harvesting Guidance. Minor modification of paragraph 4.b.ii: “PPE must be properly used by all personnel <i>regardless of MIOSHA jurisdiction. DNR staff on state timber sales with open contracts must comply with this standard</i> after any on-the-ground work has started.”



Appendix A:

Michigan Department of Natural Resources - Forest, Management Division

INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2010-1
Author: Dennis Nezych	Lead Audit Team: Jim Ferris, Les Homan (retired), Mike Donovan	
Date (mm/dd/yyyy): 1/23/11	Work Instruction or Standard and Clause Number: 1.2 Mgmt Review Process for Continual Improvement	
Other Documents (if applicable): Internal Audit NCRs 72-2010-3, 33-2010-1		Responsible Manager(s): FMD Forest Health, Inventory, and Monitoring Unit Leader
REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION: Management Review Reports, Section 3. Implementing Improvements: Division chiefs will ensure changes and improvements approved by the Statewide Council are implemented via written communication to employees.		
OBSERVED NONCONFORMITY: Management review decisions from 2007, 2008, 2009, and 2010 to conduct a statewide risk modeling project as a means to identify additional data needs for the study and evaluation of deer herbivory issues was not implemented.		
ROOT CAUSE ANALYSIS (Describe the cause of the problem.): The Cervid Herbivory Team did a broad literature review and found highly confusing and conflicting recommendations from the body of research that was available. However, the team did agree that a risk rating process should be undertaken to identify areas at high risk for problems from deer herbivory vs. those with little risk. Follow-up monitoring of these ratings could provide needed information to develop more refined models and guide forest management operations. To accomplish that task, it would be necessary to assemble a cross section of managers and research experts familiar with conditions in the field across the state. Two years ago when this decision was made, services of a key facilitator from the USDA-FS, Forest Health Technology Enterprise Team (FHTET) was needed to guide this effort. Funding issues and lack of available time from that individual has impeded the implementation of this step in the program both in Michigan and several other states over the past two years.		
CORRECTIVE ACTION (Recommended – Proposed corrective action): In response to that need, the USDA-FS, FHTET has recently created a program that can be used by knowledgeable state-level staff with minimal additional training from FHTET. This training can usually be accomplished over the phone in consultation with the FHTET facilitator. The logical FMD staff person to serve as a state-level facilitator is Roger Mech of the FMD Forest Health Program. He is a leader in the development of the Forest Health Risk Map nationally and has interacted with the FHTET facilitator in this effort to a considerable degree. Extension of his knowledge to development of a cervid herbivory risk map is logical. The FMD Forest Health Program plans to provide that service to the Cervid Herbivory Team in 2011 to again move this process along to the next logical step. Commitment from FMD and WLD management to allow the assembling of the expertise needed to accomplish this task is also needed and will be sought for the 2011 FY.		
CORRECTIVE ACTION PLAN ACCEPTED:	FCIT: Date February 7, 2010	
Follow Up Comments:		



INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2010-2
Author: Dennis Nezich	Lead Audit Team: Jim Ferris, Les Homan (retired), Mike Donovan	
Date (mm/dd/yyyy): 1/23/11	Work Instruction or Standard and Clause Number: 1.3 Regional State Forest Management Plan Development	
Other Documents (if applicable): Internal Audit NCRs 41-2010-1, 72-2010-1		Responsible Manager(s): Statewide Council
REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION: Work Instruction 1.3 specifies that the Regional State Forest Management Plans be completed in early 2011.		
OBSERVED NONCONFORMITY: RSFMPs will not be completed per approved time line.		
ROOT CAUSE ANALYSIS (Describe the cause of the problem): The Regional State Forest Management Plans are behind principally due to delays with the Biodiversity Conservation Planning Process (BCPP). The latest timelines outlined on the BSA Staff and Public Review Action Plan approved by SWC does not forecast the incorporation of BSA's and community DFC's into Regional State Forest Management Plans until 2011.		
CORRECTIVE ACTION (Recommended - Proposed corrective action): A revised strategy for completion of the RSFMPs is necessary by the SWC considering the fact that the BSA process is significantly delayed.		
CORRECTIVE ACTION PLAN ACCEPTED:		FCIT: Date February 7, 2011



INTERNAL AUDIT STATEWIDE NONCONFORMANCE REPORT (NCR)

Unit Name and Site: Michigan Department of Natural Resources State Forest Lands		Statewide NCR Number 2010-3
Author: Dennis Nezych	Lead Audit Team: Jim Ferris, Les Homan (retired), Mike Donovan	
Date (mm/dd/yyyy): 1/23/11	Work Instruction or Standard and Clause Number: 3.1 Forest Operations	
Other Documents (if applicable): Internal Audit NCRs 33-2010-5, 72-2010-4	Responsible Manager(s): FMD Forest Resource Management Section Leader Field Supervisors	
REQUIREMENT OF AUDITED STANDARD/ WORK INSTRUCTION:		
Operations Review: "Completion of operations will also be documented in a form available to the approving divisions (the Forest Treatment Completion Report may be used for this purpose).		
OBSERVED NONCONFORMITY:		
FTP completion reports not prepared and information for completed FTPs not entered into forest inventory data base.		
ROOT CAUSE ANALYSIS (Describe the cause of the problem.):		
The 2008, 2009, and 2010 Management Review Decision for the FMD Forest Resource Management Section to take the lead (in coordination with other DNR Divisions) to 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 was not completed. Note that an electronic process is being developed but is not yet complete.		
Lack of a formal FTP procedure. Lack of timely follow through after projects are completed.		
CORRECTIVE ACTION (Recommended - Proposed corrective action).		
The FTP process (and the new IFMAP activity tracking process that will replace it) needs to be documented and distributed to staff along with training by the FRM Section. WI 3.1 will need to be updated to reflect the new activity tracking process. Staff need to routinely document completion of treatments and District Supervisors need to follow up and ensure implementation per work instructions and previous management review guidance.		
CORRECTIVE ACTION PLAN ACCEPTED:	FCIT: Date February 7, 2011	
Follow Up Comments:		



APPENDIX B

Michigan Department of Natural Resources
Forest Management Division

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 effects 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
- Regional State Forest Management Plans
- Michigan State 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 Office of the State Archaeologist (OSA) to determine the significance of cultural resources that may exist within the proposed activities area.
- Notify the Office of the State Archaeologist when compartment review plans have been developed for a given year-of-entry so that OSA staff can review and provide comments prior to the compartment review.
 - For all compartment reviews and reviews of potential soil-disturbing activities, check the “Archeological Concerns” database. “Archeological Concerns” shows sections within each township that contain archaeological sites. If there are hits, consult the 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 the OSA using form PR 4440 (Archeological and Cultural Sites Reporting Form) and consult with the OSA for recommendations.
 - Contact the 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/mshda. 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 State land of interest to their tribes. This is routinely done as part of the compartment review process notification procedure. For treatments which are proposed outside of the compartment review process, notify Michigan Tribes of assessment, restoration, reclamation, and enhancement activities for wildlife, fisheries, and plant resources that are of significant tribal interest. Division Tribal Coordinators are available to assist with notifications. Allow a minimum of 30 days for a response.
 - Notify Michigan Tribal Historic Preservation Officers (THPOs) of federally funded or federally assisted undertakings involving soil-disturbing activities. All other types of federally funded activity should be

reviewed with Division Tribal Coordinators and/or the Michigan DNR Federal Aid Coordinator (within Wildlife Division). 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 and for road closures.
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 FMD: 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 C
Intrusive Activities Review and Approval Process for certified State lands

Intrusive Activity	FMD 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 for treatments not included at compartment review	Unit Manager, District Supervisor, TMS must act within 10 working days.	Wildlife Biologist, Wildlife Supervisor	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123, Chapter 7 notification
Forest Treatment Proposals (FTP) for treatments included at compartment review. (Multiple treatments in decade only 1 time approval with annual Completion reports)	Unit Manager	Wildlife Biologist	Unit Manager	Treatments involving federal funds require review by the Wildlife Division Federal Aid Coordinator (see IC 4123)
(FTP) Beaver, animal or dam removal (Exception: FTP is not required to remove beaver dams immediately 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, District Supervisor	Wildlife Biologist, Wildlife Supervisor.	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123, Chapter 7 notification
Use Permit and Event Permits not involving earth or vegetation changes (Use PR 1138 or PR 1138-1 and follow associated procedure)	Unit Manager If FMD is the LAD – District Supervisor.	Wildlife Biologist, If Wildlife is the LAD – Wildlife Supervisor.	Unit Manager if surface water is within 500 feet, or if Fisheries is the LAD	LED District Supervisor for event permits
Event Permits involving earth or vegetation changes (Use PR 1138 and follow associated procedure)	Unit Manager If FMD is the LAD – District Supervisor.	Wildlife Biologist If Wildlife is the LAD – Wildlife Supervisor	Unit Manager if surface water is within 500 feet or if Fisheries is the LAD	Follow DNR Resource Assessment Procedure checklist, IC 4123 LED District Supervisor

Intrusive Activity	FMD Approval	Wildlife Approval	Fisheries Approval	Other
Use Permit involving earth or vegetation changes (Use PR 1138-1 and follow associated procedure) (Note: renewals or extensions of use permits may not need another round of approvals if permit conditions/specifications have not changed. i.e. annual use permit for monitoring wells (consider including a specification in the permit allowing extension or renewal with manager approval)	Unit Manager If FMD is the LAD – District Supervisor.	Wildlife Biologist If Wildlife is the LAD – Wildlife Supervisor.	Unit Manager if surface water is within 500 feet or if Fisheries is the LAD.	Follow DNR Resource Assessment Procedure checklist, IC 4123
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 is within 500 feet (10 day response or inferred approval)	On leases that are more than 5 years old, MNFI, & Archeological Concerns data base must be checked.
Forest Road Construction /Improvement Permits (Internal and external)	Unit Manager, District Supervisor, 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	
Road and Public Utility Easements	According to Department Procedure	DNR Procedure	DNR Procedure	Recreation Division 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 Supervisor Follow DNR Resource Assessment Procedure checklist, IC 4123
Forest Road/ Trail Closure Proposal	Unit Manager, District Supervisor, Field Coordinator	Wildlife Biologist, Wildlife Supervisor	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123. LED District Supervisor, EcoTeam Tribal notification for permanent or seasonal closures within 1836 Treaty area (90 days in advance)

Intrusive Activity	FMD Approval	Wildlife Approval	Fisheries Approval	Other
Designated Recreation Trail Development Proposal (R 1862E)	Unit Manager, District Supervisor, Field Coordinator	Wildlife Biologist, Wildlife Supervisor	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123 LED District Supervisor, Divisions and State Trails Coordinator
Water Access on or adjacent to State Forest Land: -Site development -Dredging -Site renovation	Unit Manager, District Supervisor	Wildlife Biologist, Wildlife Supervisor	Unit Manager	Follow DNR Resource Assessment Procedure checklist, IC 4123 for new construction, LED District Supervisor, Recreation Division District Supervisor, Field Coordinator if LAD

Note: In summary, IC 4123 requires staff to: 1) Check for conformance with goals and objectives in management plans and guidance documents; 2) Check MNFI data base for rare species; 3) Check ARCHEOLOGICAL CONCERNS data base for significant cultural resources; 4) Consultation/Approval among DNR Divisions; 5) Notification/Consultation with tribes for activities of significant concern; 6) Appropriate input from stakeholders; 7-12) these items deal with implementation of approved treatments and are not listed here.