

## Michigan DNR Forest Certification Internal Audit Report

FMU: Crystal Falls

Internal Audit Dates: July 13 -15, 2011

Internal Audit Summary Date: July 15, 2011, Updated August 5, 2011 in response to a request to drop NCR 12-2011-6

Internal Audit Report Finalized: 10-13-11

Lead Auditor: Mike Donovan

Internal Auditors: Bob Burnham, Patrick Mohny, Pat Ruppen

### Comments:

The internal audit of the Crystal Falls FMU was conducted July 13 - 15, 2011. The scope of the audit was State Forest Land (SFL) within the Crystal Falls FMU. The audit criteria were the April 6, 2010 version of the Work Instructions (WIs) and all supporting DNR policy, procedures, rules, management guides, guidance documents, plans, and handbooks that were relevant to the management of SFL. On Wed, July 13th, separate, detailed lists of audit sites and routes were established for an east tour and west tour of the Crystal Falls unit based on record searches and interviews with staff. An opening meeting was held with the audit participants on Thursday morning at the Crystal Falls Office. The field portion of the audit visited 12 compartments containing a variety of sites exhibiting MDNR field management activities. Friday morning was spent reviewing the audit findings, conducting follow-up interviews and reviewing documents as needed. The audit team gathered evidence to determine work instruction conformance through interviews, document review and field observations. A closing meeting was held on Friday at 1:00 pm central time.

The internal audit team appreciated the cooperation, involvement, and openness of the Crystal Falls Unit staff. The audit team was impressed with many of the management activities and the commitment of Crystal Falls Staff to provide a wide range of natural resource values to the public. It was obvious from our observations that multiple resource values are being considered and many of them are appropriately addressed during the administration of timber sales and other programs.

### 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.

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.

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.

MDNR's internal audit review process (WI 1.2) requires a record, evaluation, and report of non-conformances with forest certification standards and related WI at all levels of the Department. As part of that process, we documented the Unit's conformity with policy, procedures, management review decisions, and WIs. Results of our audit have resulted in 1 major non-conformance, 9 minor non-conformances, and 2 opportunities for improvement. Non-conformances are documented on the Non-conformance Report forms (NCR Form 4502) below, followed by a list of opportunities for improvement (OFI's).



<b>CORRECTIVE ACTION PLAN ACCEPTED</b>					
Forest Cert Specialist:					
Date					
Actual Completion Date (mm/dd/yyyy):					
Responsible Manager:					
Date:					
Verified by:			Closed by:		
_____		_____	_____		_____
Responsible Mgr Supervisor	Signature	Date	FMD FC Specialist	Signature	Date
Follow Up Comments					





**2011 INTERNAL AUDIT  
NON CONFORMANCE REPORT**

Unit Name Crystal Falls FMU		Site location Red Rock Contract 12-008-08-01 Lone Oak, #12-052-06-01 Field interviews with FMD and WLD staff	Non Conformance Report Number (Unit Code - yyyy - #) 12-2011-3
Lead Auditor Mike Donovan	Team Member(s) Bob Burnham, Patrick Mohney, Pat Ruppen		
Date (mm/dd/yyyy) July 15, 2011	Work Instruction or Standard and Clause Number 2.1 Reforestation		
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor	Other Documents (if applicable) State Forest Management Plan	Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMD Forest Resource Management Section Leader and State Silviculturalist	
Requirement of Audited Standard/ Work Instruction:  WI 2.1: "Forest regeneration will contribute to a distribution of successional stages, age classes, and community types at the appropriate scale and intensity. Silvicultural practices will encourage regeneration that moves the stand toward its desired future condition as determined by the management objective agreed to at compartment review."  Michigan State Forest Management Plan: "Northern hardwoods: Manage the northern hardwood cover type as all-aged stands with an emphasis on quality saw log production, while balancing economic productivity and biodiversity demands. (page 121)			
Observed Nonconformity: <ul style="list-style-type: none"> <li>Northern hardwood stands are coded in forest inventory with a northern hardwood management objective in an all-aged condition.</li> <li>Northern hardwood stands are prescribed for thinning rather than selection harvest due to concern about obtaining adequate regeneration. In time, repeated thinning will perpetuate an even aged condition and may not be sustainable.</li> <li>There is a disconnect between the state level direction (SF Plan) on Northern Hardwood management and the realities of field conditions in the Crystal Falls unit and likely in nearby units.</li> </ul>			
Root Cause Analysis (Describe the cause of the problem):    Prepared by and date: D. Price, 10/12/2011 The management objective for these northern hardwood stands is for an all-aged stand structure, which is consistent with the Michigan State Forest Management Plan objective for this cover type. The achievement of the all-aged structural objective is being impeded by a lack of natural regeneration and recruitment of shade-tolerant tree species due in part to herbivory. Field staff documentation at compartment review has identified white-tailed deer as the cause of the herbivory.			
Corrective Action – (To be completed by the Unit and relevant Divisions):    Prepared by and date: D. Price, 10/12/2011 1) As co-managers for sustainable management of the State Forest system, Forest Management Division and Wildlife Division should take concrete action to evaluate and address the herbivory problem that is impacting natural regeneration and recruitment of shade-tolerant tree species. The FRM Section Manager will promote the reinstatement of the cervid herbivory team, or a similar committee, to review and make suggestions for addressing the issue. 2) In the meantime, coding of treatments in forest inventory in areas where cervid herbivory is a problem will be clarified by memo to FMU staff. 3) Recent and continuing research (Mike Walters (MSU) in particular) will be reviewed by the Silviculture and Regeneration Team (S&RT) and Forest Planning and Operations Unit, which will consider silvicultural options for managing northern hardwoods in this general area and work to incorporate this information in the Hardwood Silvicultural Guidance that is presently being drafted, reviewed and edited.			
Proposed Completion Date (mm/dd/yyyy):    October 1, 2012 for #1.    June 1, 2012 for #2 & 3.			
Responsible Manager (RM): FRM Section Manager RM Signature    Debbie A. Begalle    Date 10-13-11			

<u>Don Mankee (acting UM)</u> <u>Email Approval</u> <u>10-13-11</u> <u>FMD Unit Manager</u> <u>Signature</u> <u>Date</u>	<u>Eric Thompson (acting</u> <u>Email approval</u> <u>10-13-2011</u> <u>FMD</u> <u>FMD Dist Supervisor</u> <u>Signature</u>
CORRECTIVE ACTION PLAN ACCEPTED Forest Cert Specialist: Date:	
<hr/> <hr/> Actual Completion Date (mm/dd/yyyy): Responsible Manager: Date:	
Verified by:  <u>Responsible Mgr Supervisor</u> <u>Signature</u> <u>Date</u>	Closed by:  <u>FMD FC Specialist</u> <u>Signature</u> <u>Date</u>
Follow Up Comments	





## 2011 INTERNAL AUDIT NON CONFORMANCE REPORT

Unit Name Crystal Falls		Site location Comp 176 Stands 33 & 34		Non Conformance Report Number (Unit Code - yyyy - #) 12-2011-5	
Lead Auditor Mike Donovan		Team Member(s) Bob Burnham, Patrick Mohny, Pat Ruppen			
Date (mm/dd/yyyy) 7/15/2011		Work Instruction or Standard and Clause Number 3.1 Forest Operations			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable)		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FD Unit Manager	
Requirement of Audited Standard/ Work Instruction: Operations on State forest land will protect special (cultural, ecological, geological and historical) sites.					
Observed Nonconformity: FTP F12-40 has been using trees from compartment 176, stands 33 and 34. Per work instruction 3.1 it is required to check for rare and endangered species as well as historical sites for treatments that are done "Out of Entry". This did not appear to be done and upon further investigation the sections containing the stands have archeology concerns listed in the GDSE.					
Root Cause Analysis (Describe the cause of the problem):     Prepared by and date: Don Mankee, August 8, 2011 and Jessica Mistak, NLMMU Fisheries Supervisor August 18, 2011 Fisheries has utilized trees from certified State Forest lands in the Crystal Falls unit on three separate occasions. On the first occasion trees were utilized from an active pre-approved timber harvest. On the second occasion, trees were utilized from stand 30 in compartment 176. Out of entry process failed to check MNFI or SHPO. On the third occasion, stands 33 and 34 were considered, but not used. Instead, stand 30 was used a second time. MNFI, and SHPO were not checked again.					
Corrective Action – (To be completed by the Unit and relevant Divisions):     Prepared by and date: Don Mankee, August 8, 2011 and Jessica Mistak, NLMMU Fisheries Supervisor August 18, 2011. Fisheries staff will work with FMD staff to insure all necessary checks are made with MNFI and SHPO for FTP's involving intrusive activities that are in scope for Forest Certification.					
Proposed Completion Date (mm/dd/yyyy):     Immediate implementation Responsible Manager (RM): Jessica Mistak, Fisheries Division Unit Manager RM Signature     Email signature     Date     August 18, 2011					
Don Mankee (acting UM)		Email Approval     8-18-11		Eric Thompson (acting DFM)     Email approval     10-04-2011	
_____ FMD Unit Manager		_____ Signature     Date		_____ FMD Dist Supervisor     _____ Signature	
CORRECTIVE ACTION PLAN ACCEPTED Forest Cert Specialist: Dennis Nezich Date 10-07 -11					
Actual Completion Date (mm/dd/yyyy): Responsible Manager: Date:					
Verified by:			Closed by:		
_____ Responsible Mgr Supervisor		_____ Signature     Date		_____ FMD FC Specialist     _____ Signature     Date	
Follow Up Comments					



**2011 INTERNAL AUDIT  
NON CONFORMANCE REPORT**

Unit Name Crystal Falls FMU		Site location ISLAND NORTH, 12-051-10-01	Non Conformance Report Number (Unit Code - yyyy - #) 12-2011-6
Lead Auditor Mike Donovan		Team Member(s) Bob Burnham, Patrick Mohney, Pat Ruppen	
Date (mm/dd/yyyy) July 15, 2011		Work Instruction or Standard and Clause Number 3.1 Forest Operations	
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable) Sustainable Soil and Water Quality Practices on Forest Land	Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMD Unit Manager
Requirement of Audited Standard/ Work Instruction:			
WI 3.1: <ul style="list-style-type: none"> <li>• “Operations on the State Forest lands will protect: water quality....”</li> <li>• “Road and trail construction or maintenance contracts will require compliance with BMP Standards”</li> </ul> Sustainable Soil and Water Quality Practices on Forest Land: <ul style="list-style-type: none"> <li>• Regular inspection of all roads, bridges, culverts, and preventive actions taken to prevent erosion and the movement of sediment into surface waters, are part of a high quality and sustainable forest management operation. (page 6)</li> <li>• Whether a permit is required or not, the landowner is responsible for preventing off-site sedimentation. Activities that result in sedimentation to the water of the State are a violation of Part 91 and are subject to enforcement actions be either the County Enforcing Agency or the State of Michigan. (page 93)</li> </ul>			
Observed Nonconformity:			
<ul style="list-style-type: none"> <li>• Limestone gravel (with fines) placed at the approaches to the ford across the Paint River is adding sediment to the river and is in violation of the specific conditions of the DEQ permit that specifically forbids the use of rock with fines or contaminants.</li> </ul>			
Root Cause Analysis (Describe the cause of the problem):     Prepared by and date: Don Mankee, 8/16/2011			
A permit to improve an existing ford of the Paint River was approved by DEQ. The permit specified screened fractured rock be used to stabilize the crossing. The permit did not specifically address the top dressing aggregate to be used on the road approaches to the site, but focused on the immediate site only. While crushed limestone gravel is commonly accepted road gravel for most BMP applications, the permit did not allow “fines” within the stream channel invert. Further, placement of 14 cubic yards of approach gravel (7 yards on each side of the ford) was accomplished by the logger contracted to complete the adjacent timber harvest. The logger extended the limestone gravel over the fractured rock to the waters edge within the permitted area.			
Corrective Action – (To be completed by the Unit and relevant Divisions):     Prepared by and date: Don Mankee, 8/16/2011			
FMD staff shall review the permit application process with appropriate DEQ staff to insure the scope of the permit will address all necessary aspects of protecting stream quality while providing a safe and reasonable crossing site. Timber sale administrators will also review permit specifications with jobbers contracted to do the repair work. Sale administrators will also provide oversight to insure compliance with permit specifications.			
Proposed Completion Date (mm/dd/yyyy):     Immediate implementation			
Responsible Manager (RM): Acting UM Don Mankee (or his successor)			
RM Signature		Email signature	Date     8-16-11
Don Mankee (acting UM)	Email Approval	8-16-11	Eric Thompson (acting DFM)     Email approval     10-04-2011
FMD Unit Manager	Signature	Date	FMD Dist Supervisor     Signature
CORRECTIVE ACTION PLAN ACCEPTED			
Forest Cert Specialist: Dennis Nezich			
Date     10- 07 -11			

Actual Completion Date (mm/dd/yyyy):					
Responsible Manager:					
Date:					
Verified by:			Closed by:		
_____		_____	_____		_____
Responsible Mgr Supervisor		Signature	Date	FMD FC Specialist	
				Signature	
				Date	
Follow Up Comments					



**2011 INTERNAL AUDIT  
NON CONFORMANCE REPORT**

Unit Name Crystal Falls		Site location Norway ORV Trail, 12 Square Road		Non Conformance Report Number (Unit Code - yyyy - #) 12-2011-7	
Lead Auditor Mike Donovan		Team Member(s) Bob Burnham, Patrick Mohney, Pat Ruppen			
Date (mm/dd/yyyy) 7/15/2011		Work Instruction or Standard and Clause Number 3.2 BMP Non-conformance Reporting			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable)		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMD Unit Manager	
Requirement of Audited Standard/ Work Instruction: DNR Employees are required to watch for and report BMP problems in State Forests. DNR employees must report problems using a non-conformance report form. This information will be sent to the FMFM Unit Manager who is responsible for the site. The Unit Manager is responsible for recording and tracking all BMP problems reported.					
Observed Nonconformity: There is a general lack of RDR reporting by staff, several staff have not entered any RDR'S in the past few years, the reporting that is being done is not entered into the RDR Database.  Some RDRs are never entered into the database, but work is completed to correct the problem.  RDR database query on July 13, 2011 indicated 1-RDR entered in 2009, 0-RDR entered in 2010, and 1 RDR entered in 2011 for the Crystal Falls Unit. The RDR database is not being kept up-to-date.					
Root Cause Analysis (Describe the cause of the problem):     Prepared by and date: Don Mankee 8-17-2011 Although RDR reports are being submitted on a regular basis, there is some inconsistency amongst staff on responsibility for filing reports. Also, the hard copy reports were not being entered into the RDR tracking data base on a regular basis. Upgrades to the data base were also occurring in the recent past which delayed reports getting into the database.					
Corrective Action – (To be completed by the Unit and relevant Divisions):     Prepared by and date: Don Mankee 8-17-2011 To date there are 76 entries of RDR in the tracking database for the Crystal Falls unit. There are an additional 18 reports on file that will be entered into the database in upcoming weeks. This task is delegated to the unit Fire Officer supervisor by the unit manager. A recent staff meeting was held and all available staff were provided guidance on the process for reporting RDR's.					
Proposed Completion Date (mm/dd/yyyy):     May 1, 2012 Responsible Manager (RM):     Acting UM Don Mankee (or his successor)					
RM Signature     Don Mankee		Date     8-17-11			
Don Mankee (acting UM)     Email Approval     8-17-11 _____ FMD Unit Manager     Signature     Date		Eric Thompson (acting DFM)     Email approval     10-04-2011 _____ FMD Dist Supervisor     Signature			
<b>CORRECTIVE ACTION PLAN ACCEPTED</b> Forest Cert Specialist: Dennis Nezych Date 10-07 -11					
Actual Completion Date (mm/dd/yyyy): Responsible Manager: Date:					
Verified by:			Closed by:		
_____		_____		_____	
Responsible Mgr Supervisor     Signature     Date		FMD FC Specialist     Signature     Date			
Follow Up Comments					



Michigan Department of Natural Resources - Forest Management Division

**2011 INTERNAL AUDIT  
NON CONFORMANCE REPORT**

Unit Name Crystal Falls		Site location Norway ORV Trail		Non Conformance Report Number (Unit Code - yyyy - #) 12-2011-8	
Lead Auditor: Mike Donovan		Team Member(s) Bob Burnham, Patrick Mohny, Patrick Ruppen			
Date (mm/dd/yyyy) 07/15/2011		Work Instruction or Standard and Clause Number 6.2 Integrating Public Recreational Opportunities with Management on State Land			
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor		Other Documents (if applicable)		Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMD Unit Manager	
Requirement of Audited Standard/ Work Instruction: 6.2.5 "Resource impacts as a result of recreational use are reported, monitored and addressed."					
Observed Nonconformity: High priority sedimentation and safety issues have been identified on the Norway ORV Route for some time, and grant money is available to rectify some problems, yet no certain plan is in place to address the issues.  There is un-spent money from grants dating back to 2008 for addressing the high priority issues on this trail.					
Root Cause Analysis (Describe the cause of the problem):     Prepared by and date: Don Mankee, 8/17/2011 Some problems still remain on the Norway ORV trail. Requests were made to extend the window of available grant monies to address these problems. Limited staff and prior commitments to assist with timber management objectives have delayed completion of these projects.					
Corrective Action – (To be completed by the Unit and relevant Divisions):     Prepared by and date: Don Mankee, 8/17/2011 In 2009 and 2010, 6 culverts were installed, several sections of boardwalk were constructed, and 3 illegal trails were blocked, utilizing the above described funding source. Ongoing work to install 5 more culverts, and repair erosion problems to several more sections of trail is planned to be completed this year. Any unused funds from this grant will be rolled back into the ORV program for future project use. The UP ORV Specialist is developing a plan for addressing remaining major issues during the next fiscal year.					
Proposed Completion Date (mm/dd/yyyy):     October 1, 2011 Responsible Manager (RM):     Acting UM Don Mankee (or his successor)					
RM Signature		Email approval		Date     9-27-11	
Don Mankee (acting UM)		Email Approval     9-27-11		Eric Thompson (acting DFM)     Email approval     10-04-2011	
FMD Unit Manager		Signature     Date		FMD Dist Supervisor     Signature	
CORRECTIVE ACTION PLAN ACCEPTED Forest Cert Specialist: Dennis Nezich Date     10-07 -11					
Actual Completion Date (mm/dd/yyyy): Responsible Manager: Date:					
Verified by:			Closed by:		
Responsible Mgr Supervisor		Signature     Date		FMD FC Specialist     Signature     Date	
Follow Up Comments					



## 2011 INTERNAL AUDIT NON CONFORMANCE REPORT

Unit Name Crystal Falls		Site location 12 Square & Wallace Lake Timber sales	Non Conformance Report Number (Unit Code - yyyy - #) 12-2011-9
Lead Auditor Mike Donovan	Team Member(s) Bob Burnham, Patrick Mohney, Pat Ruppen		
Date (mm/dd/yyyy) 7/15/2011	Work Instruction or Standard and Clause Number 7.1 Timbersale Preparation and Administration Procedures		
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor	Other Documents (if applicable)	Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMD Unit Manager	
Requirement of Audited Standard/ Work Instruction: Timbersale Contract Inspection Process, Part 2 Ongoing Inspections; documentation should include: Part d, agreements not specified in contract specifications ... Part e, Document "not acceptable" or substandard performance..			
Observed Nonconformity: Lack of documentation on how extra trees cut for sale operations are being dealt with was observed at both sales. At 12 Square Units 1a and 3a were cut during a restricted period, "Slippery Bark". In addition, hemlock, a no cut species was observed in the log deck and wood was being decked against un-marked trees in violation of contract specs. Rutting was observed and mitigated but there wasn't documentation to support what took place.			
Root Cause Analysis (Describe the cause of the problem):    Prepared by and date: Don Mankee, 8/17/2011 Exceptions to standard contract specifications during the course of a timber harvest are common. The instruments to document such exceptions are sale inspection reports, and contract supplements. Sale inspection notes should be made throughout the term of the harvest operations to document issues in detail. In addition, contract supplements can be written to cover additional costs related to operational trees, and other adjustments that are deemed appropriate by the sale administrator. It is not unusual to enter into contract supplements near the end of harvest operations to minimize the number of supplements used. The sale inspection reports however, are needed to account for variances until the supplements are finalized. This process was not followed on the sales described above.			
Corrective Action – (To be completed by the Unit and relevant Divisions):    Prepared by and date: Don Mankee, 8/17/2011 Unit staff will review and implement sale administration procedures on use of sale inspection reports and timber sale contract supplements.			
Proposed Completion Date (mm/dd/yyyy):    February 1, 2012 Responsible Manager (RM):    Acting Unit Manager Don Mankee (or his successor) RM Signature    Email signature    Date    9- 27 -2011			
Don Mankee (acting UM)    Email Approval    9-27-11		Eric Thompson (acting DFM)    Email approval    10- 04 -2011	
FMD Unit Manager    Signature    Date		FMD Dist Supervisor    Signature	
CORRECTIVE ACTION PLAN ACCEPTED Forest Cert Specialist: Dennis Nezich Date    10- 07 -11			
Actual Completion Date (mm/dd/yyyy): Responsible Manager: Date:			
Verified by:		Closed by:	
Responsible Mgr Supervisor    Signature    Date		FMD FC Specialist    Signature    Date	
Follow Up Comments			



**2011 INTERNAL AUDIT  
NON CONFORMANCE REPORT**

Unit Name Crystal Falls FMU		Site location ISLAND NORTH, 12-051-10-01	Non Conformance Report Number (Unit Code - yyyy - #) 12-2011-10
Lead Auditor Mike Donovan	Team Member(s) Bob Burnham, Patrick Mohny, Pat Ruppen		
Date (mm/dd/yyyy) August 5, 2011	Work Instruction or Standard and Clause Number 3.1 Forest Operations		
<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor	Other Documents (if applicable) 2008 Management Review Appendix E. Sustainable Soil and Water Quality Practices on Forest Land	Responsible Manager(s) (Person identified by the internal audit team who implements the corrective action): FMD Unit Manager	
Requirement of Audited Standard/ Work Instruction:  WI 3.1: <ul style="list-style-type: none"> <li>“Operations on the State Forest lands will protect: water quality....”</li> <li>“Operations review: FMFM, Fisheries, and Wildlife Divisions will review and approve all intrusive operations performed or permitted by any DNR division on State Forest lands at appropriate level(s), and these approvals will be documented.”</li> </ul> <p>In the 2008 Management Review Report Appendix E, there is a category of intrusive activity for Road Construction /Improvement Permits. This category of activity requires Fisheries Division Unit Manager approval. This seems to be the most applicable category of intrusive activity to use to describe the improvements in the Paint River Ford.</p>			
Observed Nonconformity: <ul style="list-style-type: none"> <li>There is no documented discussion or approval from the Fisheries Division Unit Manager for the activities required to improve the Paint River Ford to allow crossing by logging trucks to transport logs from the timber sales (both DNR sales and private sales) on the island.</li> </ul>			
Root Cause Analysis (Describe the cause of the problem):      Prepared by and date: Don Mankee 9/12/2011 <p>Prescribed timber harvests requiring the use of the Paint River ford were approved by the usual Compartment Review process. While FM staff consulted with Fisheries staff on needed improvements to the ford to facilitate the harvests, Fisheries staff did not attend the formal Compartment review, and hence did not sign off on the treatments at that meeting.</p>			

Corrective Action – (To be completed by the Unit and relevant Divisions): Prepared by and date: Don Mankee 9/12/2011  
 The Crystal Falls unit has provided documentation of formal approval of the intrusive activities (namely the timber sale proposals requiring use of the Paint River ford) by appropriate Fisheries staff. Routine maintenance of the ford structure on an existing road is not an intrusive activity in and of itself. Therefore, no further Fisheries approval was needed. It should be noted that the DEQ permit process also solicited comment from appropriate Fisheries staff. This is documented by DEQ. The needed permit was approved by DEQ also without any comment from Fisheries. No further corrective action is needed.

Prepared by and date: FMD Field Coordinator Bill O’Neill 10/12/2011 (issue was elevated to FMD Field Coordinator for resolution)  
 I agree improvements to and use of the Ford is an intrusive activity. I also agree there was not a conclusive document provided by the unit that clearly provided the multi-divisional approval at the unit manager level that is required by the work instruction. This is not a discussion of whether fisheries division was aware of the plans for the ford, work required for its improvement, or use. Clearly through multiple formal and informal processes including manager/biologist discussions, the open house, compartment review and DEQ permitting process all divisions, including fisheries were well aware of the activity and had ample opportunity to comment and be part of the process before any work had begun. The issue is not did they all participate and know, they did. It is one of documentation of the decision.

Not attending the compartment review by a division is not reason to hold back concurrence on approved treatment, prescription or activity. If a division is in disagreement with an activity, it is incumbent on them to voice that disagreement through the process with either attendance or written communication.

Where I did find FMD lacking was in providing a definitive document with that approval. This documentation could have come in multiple forms including but not limited to; Full explanation included in the compartment review documentation and notes, multiple divisional review and sign off of DEQ permit, road improvement permit or documented e-mail.

In the future FMD will need to provide this level of documentation for all intrusive activities.

Proposed Completion Date (mm/dd/yyyy): Immediate implementation

Responsible Manager (RM): FMD Unit Manager

RM Signature Don Mankee (Email approval) Date 10- 13 -11

Don Mankee (acting UM)	Email Approval	10-13-11	Eric Thompson (acting DFM)	Email approval	10-13-2011
FMD Unit Manager	Signature	Date	FMD Dist Supervisor	Signature	

**CORRECTIVE ACTION PLAN ACCEPTED**

The corrective action dated 9-12-2011 was not accepted; the corrective action outlined by FMD Field Coordinator Bill O’Neill on 10/12/11 is accepted: “In the future FMD will need to provide this level of documentation for all intrusive activities.”

Note: It is the FC Specialist opinion that the improvement and use of the ford is an intrusive activity, and as such needed approval by the Fisheries Division Unit Manager per the Department’s Intrusive Activity Approval Procedure. No documentation was provided of such approval. The noted timber sale approval was an after the fact approval; the ford was already constructed at the time the timber sale proposal was submitted. This NCR was elevated to the FMD Field Coordinator for resolution, and was adequately addressed.

Forest Cert Specialist: Dennis Nezych

Date 10-13-11

Actual Completion Date (10/13/2011):

Responsible Manager: William O’Neill—FMD Field Coordinator

Date:

Verified by:	Closed by:
Responsible Mgr Supervisor	FMD FC Specialist
Signature	Signature
Date	Date

Follow Up Comments



## Opportunities for Improvement

WI 3.3 Throughout the audit there were indications that staff needed better understanding of road closure procedures.

WI 6.1 Glidden Lake Campground users should be informed of timber sale operations through posting at the information board.

### **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 FMD 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 FMD District Supervisor with copy to FC Specialist and Lead Auditor.
5. The FMD District Supervisor will review, support, and date the NCRs. The FMD 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, FMD Management Team, FMD 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.
9. The forest certification specialist shall track open NCRs to confirm that all are followed through to completion.