

# FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY CERTIFICATION EVALUATION REPORT

*Wisconsin Department of Natural Resources  
Managed Forest Law Tree Farm Group*

## **SCS-FM/COC-004622**

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CERTIFIED	EXPIRATION
02/Dec/2013	01/Dec/2018

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## Foreword

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SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as “well managed,” thereby permitting the FME’s use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

### **Organization of the Report**

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<http://info.fsc.org/>) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

## Table of Contents

SECTION A – PUBLIC SUMMARY .....	4
1. GENERAL INFORMATION .....	4
1.1 Certificate Registration Information .....	4
1.2 FSC Data Request .....	5
1.3 Areas Outside of the Scope of Certification (Partial Certification and Excision) .....	9
1.4 Social Information .....	9
1.5 Pesticide and Other Chemical Use .....	9
1.6 Standards Used .....	10
1.7 Conversion Table English Units to Metric Units.....	10
2. DESCRIPTION OF FOREST MANAGEMENT .....	11
2.1 Management Context .....	11
2.2 Forest Management Plan.....	14
2.3 Monitoring System.....	16
3. CERTIFICATION EVALUATION PROCESS .....	16
3.1 Evaluation Schedule and Team .....	16
3.2 Evaluation of Management System .....	30
3.3 Stakeholder Consultation Process .....	31
4. RESULTS OF THE EVALUATION .....	37
4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C.....	37
4.2 Process of Determining Conformance .....	38
5. CERTIFICATION DECISION .....	49
SECTION B – APPENDICES (CONFIDENTIAL).....	50
Appendix 1 – Current and Projected Annual Harvest for Main Commercial Species.....	50
Appendix 2 – List of FMUs Selected for Evaluation .....	50
Appendix 3 – Additional Evaluation Techniques Employed .....	50
Appendix 4 - List of Stakeholders Consulted .....	50
Appendix 5 – Pesticide Derogations .....	53
Appendix 6 – Detailed Observations.....	53
Appendix 7 – Tracking, Tracing and Identification of Certified Products .....	93
Appendix 8 – Peer Review and SCS Evaluation Team Response to Peer Review .....	104
Appendix 9 – SLIMF Eligibility Criteria .....	104
Appendix 10 – Group Management Programs .....	104

## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Certificate Registration Information

##### 1.1.1.a Name and Contact Information

Organization name	Wisconsin Department of Natural Resources		
Contact person	Mark Heyde		
	101 S. Webster St. FR/4 PO Box 7921 Madison, WI 53707-7921	Telephone	(608) 267-0565
		Fax	(608) 266-8576
		e-mail	mark.heyde@wisconsin.gov
		Website	dnr.wi.gov

##### 1.1.1.b FSC Sales Information

<input type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson	Sabina Dhungana		
Address	101 S. Webster St. FR/4 PO Box 7921 Madison, WI 53707-7921	Telephone	(608) 261-0754
		Fax	(608) 266-8576
		e-mail	sabina.dhungana@wisconsin.gov
		Website	dnr.wi.gov

##### 1.1.2 Scope of Certificate

Certificate Type	<input type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input checked="" type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input checked="" type="checkbox"/> Group SLIMF certificate (Mega Group)	
# Group Members (if applicable)	38,602 Members (MFL Owners)	
Number of FMUs in scope of certificate	48,770 FMUs (MFL orders)	
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude: Various, see records in Appendix Group Members	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
privately managed	2,665,696	
state managed		
community managed		
Number of FMUs in scope that are:		

less than 100 ha in area	48519	100 - 1000 ha in area	251
1000 - 10 000 ha in area		more than 10 000 ha in area	
<b>Total forest area in scope of certificate which is included in FMUs that:</b>			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
are less than 100 ha in area			
are between 100 ha and 1000 ha in area			
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs		2,665,696	
<b>Division of FMUs into manageable units:</b>			
Managed Forest Law Order Numbers (i.e. MFL orders) are the FMUs level management units.			

## 1.2 FSC Data Request

### 1.2.1 Production Forests

<b>Timber Forest Products</b>	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	2,661,967
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems <b>Note: Total includes red pine, white spruce, and 2/3 jack pine.</b>	170,050
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	2,387,127
<b>Silvicultural system(s)</b>	<b>Area under type of management</b>
Even-aged management	
Clearcut (clearcut size range )	452,199
Shelterwood	619,049
Other:	102,731
Uneven-aged management	
Individual tree selection	538,226
Group selection	346,961
Other:	619,049
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Each land owner has their own harvest intervals based on inventory data.; no AAH calc.
<b>Non-timber Forest Products (NTFPs)</b>	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	Owners may designate productive forest NTFPs not to exceed 20% of total acreage

Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	We don't collect data on NTFPs on private lands.
<b>Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:</b>	
See Appendix 1.	
<b>Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i></b>	
Aspen/Popple:	<i>Populus tremuloides</i> <i>Populus grandidentata</i>
Balsam poplar	<i>Populus balsamifera</i>
<b>Bottomland hardwoods:</b>	
	<i>Populus deltoides</i>
Eastern Cottonwood	<i>Quercus bicolor</i>
Swamp white oak	<i>Acer saccharinum</i>
Siver maple	<i>Ulmus americana</i>
American elm	<i>Betula nigra</i>
River birch	<i>Fraxinus pennsylvanica</i>
Green ash	
White birch	<i>Betula papyrifera</i>
Northern white cedar	<i>Thuja occidentalis</i>
<b>Central hardwoods:</b>	
	<i>Quercus alba</i>
White oak	<i>Quercus macrocarpa</i>
Bur oak	<i>Quercus velutina</i>
Black oak	<i>Quercus ellipsoidalis</i>
Northern pin oak	<i>Juglans nigra</i>
Black walnut	<i>Juglans cinerea</i>
Butternut	<i>Carya ovata</i>
Shagbark hickory	<i>Carya cordiformis</i>
Bitternut hickory	<i>Prunus serotina</i>
Black cherry	<i>Acer rubrum</i>
Red maple	<i>Celtis occidentalis</i>
Hackberry	
Balsam fir	<i>Abies balsamea</i>
Eastern hemlock	<i>Tsuga canadensis</i>
<b>Miscellaneous conifers:</b>	
	<i>Pinus sylvestris</i>
Scotch pine	

European larch	<i>Larix decidua</i>
Norway spruce	<i>Picea abies</i>
Eastern redcedar	<i>Juniperus virginiana</i>
Blue spruce	<i>Picea pungens</i>
<b>Miscellaneous deciduous:</b>	
	<i>Acer</i>
Norway maple	<i>platanoides</i>
Boxelder	<i>Acer negundo</i>
	<i>Robinia</i>
Black locust	<i>pseudoacacia</i>
Honey locust	<i>Gleditsia triacanthos</i>
Eastern Hophornbeam, Ironwood	<i>Ostrya virginiana</i>
Musclewood, Bluebeech	<i>Carpinus caroliniana</i>
<b>Northern hardwoods:</b>	
Sugar maple	<i>Acer saccharum</i>
	<i>Betula</i>
Yellow birch	<i>alleghaniensis</i>
White ash	<i>Fraxinus americana</i>
American beech	<i>Fagus grandifolia</i>
American basswood	<i>Tilia americana</i>
Northern red oak	<i>Quercus rubra</i>
Red Pine	<i>Pinus resinosa</i>
Jack Pine	<i>Pinus banksiana</i>
Eastern white pine	<i>Pinus strobus</i>
Black spruce	<i>Picea mariana</i>
Tamarack	<i>Larix laricina</i>
Black ash	<i>Fraxinus nigra</i>
White spruce	<i>Picea glauca</i>

### 1.2.2 FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough Wood	W1.1 Roundwood (logs)	All above
W1 Rough Wood	W1.2 Fuel Wood	All above
W1 Rough Wood	W1.3 Twigs	All above
W3 Wood in chips or particles	W3.1 Wood chips	All above
Non-Timber Forest Products		

Product Level 1	Product Level 2	Product Level 3 and Species
N6 Plants and parts of plants	N6.3 Whole trees or plants	Christmas trees

### 1.2.3 Conservation Areas

<b>Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives:</b>		Conservation areas are not designated on these SLIMF family forests.	
<b>High Conservation Value Forest / Areas</b>			
<b>High Conservation Values present and respective areas:</b>			Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		-
HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		-
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		-
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		-
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		-
HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		-
<b>Total Area of forest classified as 'High Conservation Value Forest / Area'</b>			-

*\*Note: Total conservation and HCV areas may differ since these may serve different functions in the FME's management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.*



### 1.3 Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input checked="" type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
<b>Explanation for exclusion of FMUs and/or excision:</b>	Agricultural food plots are excised.*	
<b>Control measures to prevent mixing of certified and non-certified product (C8.3):</b>	No forest products are produced on these agricultural acres.	
<b>Description of FMUs excluded from or forested area excised from the scope of certification:</b>		
<b>Name of FMU or Stand</b>	<b>Location (city, state, country)</b>	<b>Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)</b>
Various.	Not mapped unless at least 2 ac.	3999*

\*Forest owners establish and manage small (generally less than 1-acre ea.) wildlife food plots from time to time. Although DNR recommends that landowners do not plant GMO corn and soybeans (e.g. Roundup Ready®) as wildlife food sources this has been very difficult to track and control. Therefore, based on the frequency of food plots found during the 2013 audit the following formula was developed to estimate the total number and area of food plots in the FMUs: number of MFL orders X .082 x 1 ac = number of acres excised; the calculation for 2018 is: 48,770 x .082 x 1 ac = 3999 ac

### 1.4 Social Information

<b>Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):</b>	
# male workers 32	# female workers 9

### 1.5 Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.			
Commercial name of herbicide/Active Ingredient	Quantity applied annually (kg or lbs)	Size of area treated annually (ha or ac)	Reason for use
Glyphosate (Accord, Roundup, etc.)	42	238	Site prep and invasive species control
Metsulfuron methyl (Escort, Patriot)	20	88	Site prep and invasive species control
Sulfometuron methyl (Oust, Spyder)	5	170	Site prep and invasive species control
Triclopyr (Garlon, Tahoe, etc.)	153	411	Site prep and invasive species control
2,4-D (Hi-Dep, Patron, etc.)	53	53	Site prep and invasive species control
Total Other	39	1,965	Site prep and invasive species control

## 1.6 Standards Used

All standards employed are available on the websites of FSC International ([www.fsc.org](http://www.fsc.org)) or SCS Global Services ([www.SCSglobalServices.com](http://www.SCSglobalServices.com)). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS' Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS' COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

Standards used <i>NOTE: Please include the full standard name and Version number and check all that apply.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC-US Forest Management Standard v1.0
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V7-0
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> FSC-STD-40-004 V3-0 ( <i>fully integrated operations only</i> )

## 1.7 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	To	multiply by
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft.)	Meter (m)	0.3048
Yard (yd.)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	To	multiply by
Square foot (sq. ft.)	Square meter (m <sup>2</sup> )	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	To	multiply by
Cubic foot (cu ft.)	Cubic meter (m <sup>3</sup> )	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

## 2. Description of Forest Management

### 2.1 Management Context

#### 2.1.1 Regulatory Context

<p><b>Pertinent Regulations at the National Level</b></p>	<ul style="list-style-type: none"> <li>• Clean Water Act (Section 404 wetland protection)</li> <li>• Occupational Safety and Health Act</li> <li>• National Historic Preservation Act</li> <li>• Archaeological and Historic Preservation Act</li> <li>• Americans with Disabilities Act</li> <li>• U.S. ratified treaties, including CITES</li> <li>• Endangered Species Act</li> </ul>
<p><b>Pertinent Regulations at the State / Local Level</b></p>	<ul style="list-style-type: none"> <li>• Wisconsin BMPs for Water Quality</li> <li>• <i>Chapter 26, Stats.-Protection of Forest Lands</i></li> <li>• Statutory authority to engage in forest certification (broadly interpreted): §§23.11, 28.01, 28.07, and 77.80</li> <li>• DNR Manual Codes and Handbooks</li> <li>• Wisconsin Pesticide Law (Chapter 94, WI Statutes)</li> <li>• Use of Pesticides on Land and Water Areas of the State of Wisconsin (WI Administrative Code, Chapter NR 80)</li> <li>• Wild Animals and Plants Law (Chapter 29, WI Statutes) and WI Administrative Code NR 10</li> <li>• Wisconsin Water Law: UW Booklet</li> <li>• Wisconsin Groundwater Law (Chapter 160, WI Statutes)</li> <li>• Navigable Waters (Chapter 30, WI Statutes)</li> <li>• Water Quality Standards for Wetlands (Chapter NR 103, WI Administrative Code)</li> <li>• Wisconsin Shoreland Management Program (Chapter NR 115, WI Administrative Code)</li> <li>• Endangered and Threatened Species (Chapter NR 27, WI Administrative Code)</li> <li>• Wisconsin Historic Preservation Laws</li> </ul>
<p><b>Regulatory Context Description</b></p>	<p>Federal and State laws and administrative codes most pertinent to MFL management are listed above. Adherence to management planning templates and guidelines is the primary method of ensuring legal compliance.</p>

### 2.1.2 Environmental Context

<b>Environmental safeguards:</b>
<p>WI DNR has numerous safeguards in place to minimize impacts of forest management. The safeguards are described in the following documents:</p> <ul style="list-style-type: none"> <li>• Wisconsin BMPs for Water Quality, <a href="https://dnr.wi.gov/files/pdf/pubs/fr/FR0093.pdf">https://dnr.wi.gov/files/pdf/pubs/fr/FR0093.pdf</a></li> <li>• NHI Database for RTE species, <a href="https://dnr.wi.gov/topic/NHI/data.asp">https://dnr.wi.gov/topic/NHI/data.asp</a></li> <li>• Statewide Forest Plan, <a href="http://www.dnr.wi.gov/topic/ForestPlanning/documents/SFPlanFINAL.pdf">www.dnr.wi.gov/topic/ForestPlanning/documents/SFPlanFINAL.pdf</a></li> <li>• Wisconsin Bird Conservation Initiative, <a href="http://www.wisconsinbirds.org/">http://www.wisconsinbirds.org/</a></li> <li>• Wisconsin Wildlife Action Plan, <a href="https://dnr.wi.gov/topic/wildlifehabitat/actionplan.html">https://dnr.wi.gov/topic/wildlifehabitat/actionplan.html</a></li> <li>• Wisconsin Land Legacy Report, <a href="https://dnr.wi.gov/topic/lands/landlegacy/">https://dnr.wi.gov/topic/lands/landlegacy/</a></li> <li>• <a href="#">Private Forestry Handbook [PDF]</a></li> <li>• <a href="#">Forest Tax Law Handbook [PDF]</a></li> <li>• <a href="#">Timber Sale Handbook</a></li> <li>• <a href="#">Forestry Silviculture and Aesthetics Handbook</a></li> <li>• <a href="#">Public Forest Lands Handbook [PDF]</a></li> <li>• <a href="#">Ecological Landscapes Handbook</a></li> <li>• <a href="#">Forest Management Guidelines</a></li> <li>• <a href="#">National Heritage Inventory maps</a></li> </ul> <p>In addition the WI DNR system uses several notification, planning, and monitoring forms which include specific stand level information and plans for environmental safeguards. Below is a list of selected forms:</p> <ul style="list-style-type: none"> <li>• <a href="#">2400-32 [PDF]</a> Stand Examination Tally</li> <li>• Timber Sale Notice and Cutting Report: <b>Form 2460-001</b> <ul style="list-style-type: none"> <li>○ <a href="#">Excel version</a> - Excel version functions properly <b>only if it is saved locally to your personal computer</b> before use.</li> <li>○ <a href="#">2460-001A</a> – Word document</li> </ul> </li> <li>• Post-harvest form</li> </ul>
<b>Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:</b>
<p>The MFL program uses the following strategies for protecting threatened and endangered species.</p> <ul style="list-style-type: none"> <li>• Training of foresters on RTE species and use of Natural Heritage Inventory search, <a href="#">National Heritage Inventory maps</a></li> <li>• RTE species are identified as part of the plan writing and prior to timber harvests.</li> <li>• When RTE species are known to occur (by querying the Natural Heritage Inventory), staff will determine appropriate steps to protect the species. These steps include use of RTE species guidelines and a consultation with the biologist or ecologist, as needed.</li> </ul>

### 2.1.3 Socioeconomic Context

The state of Wisconsin is estimated to have a population of 5,795,483 as of July 1, 2017 (<https://www.census.gov/quickfacts/WI>). There is over 91% of the population with a high school degree and over 28% with a Bachelor’s degree or higher. Median household income is \$54,610 and per capita income estimated at \$29,253 and 11.8% of the population below determined to be living in poverty. According to 2010 data the population is 105 per square mile. There are over 140,800 businesses operating in the state employing approximately 2,524,329 persons (2016 data). The percentage of employable persons is about 67% of the population, of which approximately 37% are male.

The greatest sales generation values are produced by the manufacturing sector, followed by retail sales, and merchant whole-sale (based on 2012 data). Forestry is one of the top ten industries by employment and output in Wisconsin (2016, Forest Economy Wisconsin, Wisconsin Department of Natural Resources).

Most of the following information is from the “Forest Economy of Wisconsin” based on 2016 analyses.\* Forestry is one of the top ten industries by employment and output in Wisconsin, providing 1.8% of the jobs and 4% of the output in the state. Every job in forestry supports 1.7 additional jobs in the state. Every million dollars of output in forestry creates \$721,000 of output in other sectors. Wisconsin is the number one paper producing state in the US and is 2% of the state GDP. Forest products international exports totaled \$2.2 billion.

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*(\*Forest industry economic impacts were modeled using the Impact Analysis for Planning (IMPLAN) software, originally developed by the US Forest Service in cooperation with the University of Minnesota and Federal Emergency Management Agency (FEMA). The model is designed to estimate economic effects of an industry on the local or regional economy. The database contains economic statistics by zip code and is not estimated from national averages. It can be used to summarize the importance of various industries to the economy and to evaluate economic impacts to local economy if there is a change in the industry. IMPLAN uses a 440 sector input-output table based on the North American Industrial Classification Scheme (NAICS). The NAICS replaced the previous Standard Industrial Classification (SIC) codes. For reporting purposes most states combine the results from 23 IMPLAN sectors (9 in pulp and paper, 3 in forestry and logging, and 11 in sawmills and wood products) to discuss the forest products industry.”, via personal communication, Julie Ballweg, PhD, Forest Economist, Bureau of Forest Management/Division of Forestry, Wisconsin DNR.)*

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According to the Wisconsin Department of Health Services, [www.dhs.wisconsin.gov/minority-health/population/amind-pop.htm](http://www.dhs.wisconsin.gov/minority-health/population/amind-pop.htm), American Indians comprise almost 100% of the American Indian and Alaska Native population in Wisconsin; the 2000 Census counted 225 people in Wisconsin (0.01%) who identified as Alaska Native. Wisconsin's American Indian population totaled 53,358 in 2008, which was 0.9% of the state total of 5,672,297. By 2008, the American Indian population had increased 12.6% since the 2000 Census.

Wisconsin is home to 11 federally recognized tribes: Bad River Band of Lake Superior Chippewa, Ho-Chunk Nation, Lac Courte Oreilles Band of Lake Superior Chippewa, Lac du Flambeau Band of Lake Superior Chippewa, Menominee Tribe of Wisconsin, Oneida Nation, Forest County Potawatomi, Red Cliff Band of Lake Superior Chippewa, St. Croix Chippewa, Sokaogon Chippewa (Mole Lake), and Stockbridge-Munsee, in addition to other, non-federally-recognized tribes. Each tribe maintains a government-to-government relationship with the State of Wisconsin. Also, each tribe has its own unique peoples, languages, and spiritual and health practices;

As of 2008, the distribution of American Indian populations in Wisconsin included over 60 percent in the counties of Milwaukee, Brown, Menominee, Shawano, Sawyer, Outagamie, Vilas, Dane, Ashland, and Bayfield. About 45 percent of Wisconsin's American Indian population resided in metropolitan areas; 13.7 percent, or 7,313 people, resided in Milwaukee County.

#### **2.1.4 Land use, Ownership, and Land Tenure**

Wisconsin once had a predominantly rural, farm-based population; now, more than half of the state's residents live in municipalities with over 10,000 people (“Wisconsin Land Legacy Report: An inventory of places to meet Wisconsin's future conservation and recreation needs”, Pohlman, John D. et al. (Editors). 2006. Wisconsin Department of Natural Resources, Madison, WI.). Some villages and rural towns, particularly those that played important roles in the timber and mining industries in the north as well as some in the southern and western part of the state away from major highways, have fewer residents

now than 50 or even 100 years ago. Eighteen of Wisconsin’s 72 counties lost population from 1940 to 1990.

Possibly the most striking change occurring in Wisconsin’s forests has been the rapid change in ownership pattern of the private, non-industrial forest. Some examples of this change include: the number of private forest owners has doubled in the last forty years to an estimated 270,000; every year almost 3,400 new parcels are created within forest land; the average size of privately owned forest parcels in southern Wisconsin is now just over 30 acres; and, 90% of forest owners own fewer than 100 acres; almost 20% of forest land owners acquired their property in the last seven years.

Of the nearly 17 million acres of forested land in Wisconsin, individual private owners own the majority (56%) of those forests. The state owns just seven percent, and the federal government, 10 percent. In the public sector, counties and municipalities own the largest amount of forestland: 15 percent. This is followed by private corporations and other groups (six percent), forest industry (four percent), and tribal lands (two percent).

Enrollment into the Managed Forest Law (MFL) program is open to all private owners of forested land. To be eligible for the MFL program, a parcel must: be at least 20 contiguous acres under the same ownership; be at least 80% covered by forest dedicated to growing commercial timber products and able to grow at least 20 cubic feet of wood per acre, per year; up to 20% of each forest parcel may be deemed unsuitable to grow timber or in an unmanaged vegetation type such as brush, swamp, standing water, bog, rock outcrop, sand dune, abandoned farm field, roadway and utility or railroad rights-of-way; Wooded “no-cut” zones are considered unmanaged; not be within a recorded subdivision; must not be tax-delinquent; must have current year property taxes must be paid by August 15; must be accessible to the public by foot, by public road or from other land open to public access, if the parcel is designated as MFL “Open” land; and, must have no buildings or improvements.

**2.2 Forest Management Plan**

<b>Management Objectives:</b>
<p>The Managed Forest Law (MFL) program is a landowner incentive program that encourages sustainable forestry on privately owned woodlands. In exchange for following sound forest management, the landowner pays reduced property taxes. It was enacted in 1985 and replaced the Woodland Tax Law and the Forest Crop Law. MFL is the only forest tax law that is open to enrollment. Land enrolled in the MFL program must be managed according to a plan agreed to by the landowner. <a href="https://dnr.wi.gov/topic/ForestLandowners/mfl/">https://dnr.wi.gov/topic/ForestLandowners/mfl/</a>.</p> <p>The purpose of the program is governed by the Managed Forest Law (Sections 77.80 to 77.91, Wis. Stats.) and its administrative rules (Chapter NR 46, Wis. Adm. Code). Under Section 77.80, <b>Purpose</b>. The purpose ... is to encourage the management of private forest lands for the production of future forest crops for commercial use through sound forestry practices, recognizing the objectives of individual property owners, compatible recreational uses, watershed protection, development of wildlife habitat and accessibility of private property to the public for recreational purposes.</p> <p>To apply for the MFL program, an application must be submitted with a management plan written by a certified plan writer. The management plan addresses items such as landowner objectives, timber management, wildlife management and water quality.</p>

Forest Management Plans must be written by a certified plan writer who is a cooperating forester certified by the DNR to write Managed Forest Law (MFL) plans. Certification is granted to individual foresters, not the company or organization they work for. Certified plan writers are the only private consulting or industrial foresters who can write management plans for the MFL program.

**Forest Composition and Rationale for Species Selection:**

A primary guidance that provides this rationale is the Forestry Silviculture and Aesthetics Handbook, [Forestry Silviculture and Aesthetics Handbook](#).

**General Description of Land Management System(s):**

Land management systems are described in the Wisconsin Forest Management Guidelines (PUB-FR-226-2011) and the Silviculture Handbook.

**Harvest Methods and Equipment used:**

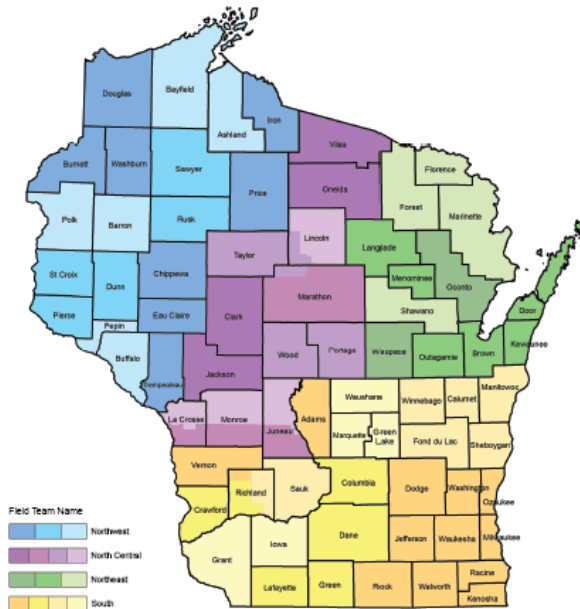
Harvesting methods for Wisconsin Forests are described in detail in the DNR publication “Logging Methods for Wisconsin Woodlands (FR-788)”

<http://dnr.wi.gov/topic/forestmanagement/documents/pub/FR-778.pdf>

**Explanation of the management structures:**

DNR serves as the primary regulatory entity and group manager for the non-industrial, family forest (MFL) lands enrolled in this certificate. The program is administered by the Division of Forestry, Tax Law Section through the following positions: Tax Law Compliance Specialist (Group Manager), Tax Law Section Chief, Tax Law Operations Specialist, Tax Law Administration Coordinator, Tax Law Forestry Specialists (Foresters), and Tax Law Administrative Specialists. The latter two positions are structured as *Tax Law Field Teams* organized geographically in to four broad Field Teams: Northwest, South, Northeast, and North Central. Each Field Team has a Field Team Leader.

Division of Forestry Tax Law Field Teams



Wis DNR Forestry 2/15/2017 The data shown on this map have been obtained from various sources and are of varying age, reliability, and resolution. This map is not intended to be used for navigation, nor is this map an authoritative source of information about legal land ownership or public access. Users of this map should confirm the accuracy of land through other means in order to avoid misusing, misinterpreting, or misapplying the information expressed or implied. It is made regarding accuracy, appropriability for a particular use, completeness, or legality of the information depicted on this map.



## 2.3 Monitoring System

<b>Growth and Yield of all forest products harvested:</b>
Growth and yield is monitored on each MFL property by DNR and Cooperating Foresters during plan writing and mandatory practices. Monitored systematically across the State. See WI DNR Statewide Forest Assessment 2010 <a href="http://dnr.wi.gov/topic/ForestPlanning/conclusions.asp?id=1">http://dnr.wi.gov/topic/ForestPlanning/conclusions.asp?id=1</a>
<b>Forest dynamics and changes in composition of flora and fauna:</b>
Monitored on each MFL property by DNR and Cooperating Foresters during plan writing and mandatory practices. Monitored systematically across the State. See WI DNR Statewide Forest Assessment 2010 <a href="http://dnr.wi.gov/topic/ForestPlanning/conclusions.asp?id=1">http://dnr.wi.gov/topic/ForestPlanning/conclusions.asp?id=1</a>
<b>Environmental Impacts:</b>
Monitored on each MFL property by DNR and Cooperating Foresters during plan writing and mandatory practices. Monitored systematically across the State. See WI DNR Statewide Forest Assessment 2010 <a href="http://dnr.wi.gov/topic/ForestPlanning/conclusions.asp?id=1">http://dnr.wi.gov/topic/ForestPlanning/conclusions.asp?id=1</a>
<b>Social Impacts:</b>
Not applicable to individual MFL properties because they all qualify as SLIMF. Monitored at the State level. See WI DNR Statewide Forest Assessment 2010 <a href="http://dnr.wi.gov/topic/ForestPlanning/conclusions.asp?id=1">http://dnr.wi.gov/topic/ForestPlanning/conclusions.asp?id=1</a>
<b>Costs, Productivity, and Efficiency:</b>
Not applicable to individual MFL properties because they all qualify as SLIMF. Monitored at the State level.

## 3. Certification Evaluation Process

### 3.1 Evaluation Schedule and Team

#### 3.1.1 Evaluation Itinerary and Activities

FMU / location	Activities / notes	AUD*
<b>Date: Monday, June 11, 2018</b>		
Order #29-023-2012 Juneau County	Primarily oak harvest. Oak wilt harvest timing restriction. 3 adjacent parcels. Certified Plan Writer (CPW), consultant forester. Cutting Notice filed by previous owner. FMP written in 2012. Cutting Notice and Record DO NOT have the box checked for "Are lands certified". Wet pockets protected with frozen ground. NHI - no hits. In-stand diversity present, wet areas included snags. Green tree retention sufficient.	ALL
Order # 29-023-2012 Juneau County	Overstory removal harvest of a tract where the owner was in the process of removing 1-5 acres for conversion to a housing site. A trailer and other equipment were present on the site, along with recent clearing of brush, digging of a small pond and brushing a walking trail. Large residual White Pines were left on the property, along with a relatively large number of residual trees, snags and downed woody material. There was evidence in the file that the landowner complained that too many trees were being cut. Forester explained loggers were well within plan, simply did not match owner expectations, used as educational opportunity. Abundant mature, pole, and retained white pine and oak regeneration throughout. Several low spots on the property were evident with trees removed, but no obvious rutting or soil disturbance. There was a moderate risk for environmental impacts with the low spots but no issues found. 78 acres.	ALL
Order #72-034-2014 Wood County	28-acre harvest in a 40-acre unit owned by seven siblings. Met with forestry consultant. No invasive species, archeological values, nor detections of T&E by NHI. Access agreement with adjoining landowner was put in place to haul logs across the landowner's field in exchange for a load of logs	SBE



FMU / location	Activities / notes	AUD*
	for firewood. Timber sale contract is between mill and the landowner. Group selection cut with overstory oak removed. Consultant had marked each tree, leaving 70-80 sq-ft basal area. Wildlife trees, including cavity trees, were noted. Observed good oak regeneration. One small marshy area had been crossed during the winter harvest, but there was no sign of erosion or compaction. Per agreement with landowner, no cutting occurred around deer stands. FISTA trained logger was used for harvest. Management plan up to date.	
Order # 72-016-2018 Wood County	76-acre harvest had been logged in the winter. Sanitation harvest of oak with jack pine. Minimal residual damaged observed. NHI detected one occurrence of an insect species, and adequate protections were in place. Oak regeneration was observed. There was no management plan onsite, but the plan was acquired later in the audit, and it was confirmed that the plan is up to date.	SBE
Order # 72-240-1999 Wood County	360-acre unit unmarked pine thinning was conducted in accordance with document, "Process for Conducting Unmarked Pine Thinning on Tax Law Lands" (dated 12/14/2005). NHI detected six occurrences, and appropriate protection measures were implemented. Management plan reviewed and was up to date. No residual damaged observed.	SBE
Order #27-018-2016 Jackson County	Partially cut sale - overstory removal. Central hardwoods removing primarily red oak sawlog and pulp along with elm, hickory, and white oak. Very good green tree retention of oaks as mast and habitat for wildlife (turkey). Provision to clean off equipment prior to moving from property for slowing spread of invasive plant species. The main skid trail into the harvest area had washout and was not in conformance with BMPs. There were no water bars installed. Harvesters left sale area in the fall and are due to re-enter the site sometime this summer. Road linear from top until turn for approximately 6 chains with no water bars. Cutting notice specifies road to be smooth and water bars installed after completion of harvest. 46.6 acres. <b>Non-conformity, see section 4.2.</b>	BIJ
Order #27-014-2001 Jackson County	Private company working with landowner. Active logger interviews (Foreman - harvester, skidder driver). Interview CPWs of private forest products company foresters (2). Stand 1 - Abandoned Christmas tree farm, white pine with small pole timber using row thinning, 2 rows cut, 3 rows left. Leave rows removing worst-first (damage, insect/diseased, poor form, undesired species). Overall very poor-quality stand. Stand 2 - oak sawtimber over central hardwood small pole in overstory removal. Retained 3-5 large white oak sawlogs /er acre for wildlife and retained 2 small reserve areas. Buckthorn and prickly ash, knocked down and management in FMP. Logging equipment debris cleaning required after completion of the job before moving equipment. Additional treatment may be needed if competing with regeneration. Cutting notice references Forestry Invasives BMP Manual. Discussions: EAB, BMPs, Spill reporting requirements, Cutting Notice and post-harvest inspections/enforcement. 71 acres.	BIJ
Order #29-041-2001 Juneau County	NHI hit for one plant of special concern and one animal under full protection - Harvesting is taking place on upland ground which is not suitable habitat for the plant and no effect is expected. The harvest area does not include suitable habitat for the animal of concern as it prefers wetland sites. Large red pine plantation thinned every other row. The site borders a riverine habitat that contained a plant species of special concern and a Federally Protected Turtle that winters in the river system and can use the upland sites during the summer months. Harvesting on upland ground which is not suitable habitat for the plant species. Harvest area does not include suitable habitat for the turtle, as it prefers wetland sites. Mandatory practice was to implement BMPs and avoid disturbance of the turtle. No issues with the thinning operation. 69.43 acres.	MLM RSB
Order #29-022-1996 Juneau County	Met with landowner/group member and daughter, interview. They were supportive of the harvesting of the property. They allow hunting, but were concerned about ATV use of the skid trails without their permission or knowledge. Their objectives noted in the forest management plan were being met, however during discussions with the current owners, it was clear that the objectives of the original plan were continued and limited discussions had occurred regarding landowner objectives when the transfer occurred 15 years ago. Both the landowner and her daughter appreciated the assistance of the DNR Foresters and are looking forward to meeting with the current DNR forester. There were three 40-acre tracts on the property. Inspected a smaller red pine stand that had recently had a second thinning. Trees were well spaced; harvested trees were	MLM RSB

FMU / location	Activities / notes	AUD*
	<p>delivered to local lumber mill. Forester for the sale was serving as the forestry consultant. Logger had left slash and debris on the upland skid trails.</p> <p>Three NHI plant hits occurred for both this site and 29-024-2006, below. All three species grow in wetlands and after reviewed determined they were unlikely to be affected as the harvest will take place on sandy well-drained soils and water quality BMPs will be followed; no issues.</p> <p>More slash could have been used on a low spot were a small amount of rutting was observed but not out of conformance with BMPs. Sale forester explained that once the harvesting was completed, the skid trail would be graded and put to bed. No hardwoods were cut. The perennial stream was well buffered and protected. The creek was running clear. Some flagging was observed along the SMZ. Logging on other side of the creek was kept to the uplands and skid trails followed the contour. No issues were found with the logging. There was a moderate risk for environmental impacts due to the large perennial stream and associated wetlands. Observed that the DNR Foresters did not appear to have copies of the Wisconsin BMPs in their trucks or on-hand. 37 acres.</p>	
<p>Order #29-024-2006 Juneau County</p>	<p>Met with landowner/group member and daughter, interview. They were supportive of the harvesting of the property. Interview details for site above.</p> <p>There were three 40-acre tracts on the property. Inspected a large red pine stand that had recently had a second thinning. Trees well-spaced. Trees were delivered to local mill. Logger had left slash and debris on the upland skid trails.</p> <p>No hardwoods were cut. The perennial stream was well buffered and protected. The creek was running clear. Some flagging was observed along the SMZ. Logging on other side of the creek was kept to the uplands and skid trails followed the contour. No issues were found with the logging. There was a moderate risk for environmental impacts due to the large perennial stream and associated wetlands. Observed that the DNR Foresters did not have copies of the Wisconsin BMPs in their trucks or on-hand. 160 acres.</p>	<p>MLM RSB</p>
<p>Order #29-009-2015 Juneau County</p>	<p>Stand 3, 3 oak patch clearcuts with white oak reserves viewed. Good oak regeneration, limited browse observed. Marked green tree retention viewed. Water bars in most western patch clearcut displayed some limited erosion and sedimentation, main turnout near top of slope was angled such that the diverted water ran downhill, rather than across the slope at an angle. No water resources present. Limited invasives - barberry was observed pre-harvest and sprayed by the landowner in the fall of 2016 with planned re-spray in spring of 2017. NHI and Arch/Cultural/Historic search completed, no hits. 21.77 acres.</p>	<p>MLM</p>
<p>Order #29-024-1997 Juneau County</p>	<p>Even-aged regeneration harvest in oaks, Stand 1 (23 acres) and Stand 2 (6 acres). Excellent oak regeneration. Logger stayed away from the short steep slopes present. One community type was identified during the NHI search, however, after review, it was determined that the harvest is low risk to negatively affect the community type of concern. Oak wilt harvest restriction (no harvest 1 April through 15 July) and harvest under dry or frozen conditions only. Wildlife and snags observed in the stand. BMPs employed on haul roads. 80 acres.</p>	<p>MLM</p>
<p><b>Date: Tuesday, June 12, 2018</b></p>		
<p>Order #72-020-1999 Wood County</p>	<p>Deputy Director, Forestry Operations, and a Forest Tax Law Specialist joined for much of the day. Residual pine had good crown. The perennial Five Mile Creek was well protected with no cutting in the RMZ. There was a small wet seep at the edge of the harvested area, but no sign of erosion was observed. Older harvest roads had been used for this cutting. Staff explained the process of approval of cutting reports and field recon that occurs following the report approval. Lupine described on the cutting notice was not found. Clearcut area had some regeneration of white pine.</p>	<p>SBE</p>
<p>Order #72-021-2009 Wood County</p>	<p>Same landowner as #72-020-1999 described above. Included overstory removal along property line. Boundary of property was clearly marked with blue flagging. The forest management plan is up to date. No sign of erosion, and silvicultural prescription was appropriate to the site and implemented according to the cutting notice.</p>	<p>SBE</p>

FMU / location	Activities / notes	AUD*
Order #72-028-2016 Wood County	Included small patch cuts of aspen and oak. Harvest involved crossing a creek. Two steel plates had been placed across the water level of the creek, and no erosion was observed. New road included small piped cross drains in lower areas; no water observed. Food plot observed. Harvest also included a selection oak harvest, which had been hand felled with stumps cut high (which may have been from winter logging). Landowner was the logger.	SBE
Order #50-013-2009 Portage County	Interviewed forestry consultant onsite. Consultant has a pesticide applicators license, which was confirmed as being up to date; buckthorn is a problem on the site. Long term, portions of the site will be converted to a Northern hardwood mixed forest. All trees used for tapping by the landowner were avoided, as requested. When consultant set up the harvest, he marked the property boundaries to ensure that the logger was aware of the boundary. Leave trees for wildlife were clearly marked, and the boundaries of the aspen clearcut were marked. Management plan up to date.	SBE
Order #50-007-2005 Portage County	Three NHI occurrences detected, and appropriate protection measures were implemented in accordance with the cutting notice. The harvest included a stand infected with spruce budworm with many dying trees and scattered aspen throughout. Harvest included an aspen coppice. There was a wet area without sign of erosion.	SBE
Order #50-008-2009 Portage County	Cutting notice submitted in 2008 and not closed until 2017. There were many trees marked that had not been cut. Forest road crossed a creek; two culverts at the crossing, and it was well armored with little erosion. The forestry management plan is up to date. No reconnaissance prior to sale was done by the DNR (recon may have detected the numerous marked and uncut trees). Landowner no issues.	SBE
Order #50-012-2004 Portage County	Cutting plan does not list invasive species; it simply states that invasive species will be identified. Forest access road is in very good condition. Unit harvested in 2014 and focused on pine. There remains a heavy understory of white pine, and the spruce appears to be struggling.	SBE
Order #27-013-2001 Jackson County	Natural red and white pine stand with oak. Thinned leaving quality red and white pine, about 80 years old. Removing by Order of Removal. Abundant RM regen, Winter harvest 2015-2016. Wide RMZ left outside of sale area as buffer, exceeded BMP requirements to protect steep slopes of Hall's Creek.	BIJ
Order #27-014-2001 Jackson County	Natural red and white pine stand with oak. Thinned leaving quality red and white pine, about 80 years old. Removing by Order of Removal which generally includes dying trees, those with insect infestation, disease infection, poor quality form, obvious defects, and undesired species. The exact order and species are specified by forester. Order of Removal is a DNR standard term and was also used in common communications with consulting foresters and some landowners. DNR explains term is include in trainings for CPWs and consulting foresters. Abundant RM regen, Winter harvest 2015-2016.	BIJ
Order #27-015-2001 Jackson County	Clearcut releasing advanced oak regeneration.	BIJ
Order #27-016-2001 Jackson County	Natural red and white pine stand with oak. RMZ with steep bluffs along river, left as no harvest, no equipment buffer.	BIJ
Order #27-004-1994 Jackson County	Mature white pine salvaged in 2017. Storm damaged by fall 2016 storm with high wind throw risk for live trees with small crowns led to harvesting overall to treat the whole area. Will thin 25-30 years. Logger was Dave Casper. Left clusters of green trees along edge that were undamaged by storm. Rootballs from windthrown trees evident throughout. Oak/maple regen abundant. 87.09 acres.	BIJ
Order #10-046-2014 Clark County	160 acres, northern hardwood thinned area with a small aspen clearcut. Sale included large number of high quality red oak. Direction of management will depend on whether efforts to regenerate red oak are successful. If sufficient red oak regen then will manage as even-aged stand. If no red oak then will be managed as an unevenaged stand of northern hardwoods. 38 acres.	BIJ

FMU / location	Activities / notes	AUD*
Order #10-054-2014 Clark County	Two stands treated, 36.5 acres total. Stand 1 was 17 acres and Stand 10 was 10 acres. Red and white oak stands. Both unevenaged entry using single tree selection. Basal area brought down to 80-100 sq.ft./acre using Order of Removal. Also placed canopy gaps for regeneration of oak/maple. Creek along east side of sale area well removed from sale area with broad area of lowland brush (alder) as additional buffer.	BIJ
Order #10-49-2014 Clark County	Aspen clearcut, 14 acres and also a northern hardwood selection harvest of an evenaged stand in cut designed to move towards an unevenaged system on 23 acres.	BIJ
Order #10-53-2014 Clark County	A 38 acres northern hardwood thinning. Standard practices, no issues.	BIJ
Order #10-40-2005 Clark County	Landowner and CPW interviews. Northern hardwood stand undergoing 4th thin including Stands 5 and 6, very well done thinning, no damage to residuals, good road construction, no issues.	BIJ
Order #10-014-2010 Clark County	Northern oak stand shifting to hardwood stand while retaining some oak for seed trees/wildlife mast. Gaps placed for regeneration. RMZ along an intermittent creek with buffer outside of sale area. Landowner actively pulling, mowing and spraying for spotted knapweed throughout property. A wide variety of stands and management objectives were observed over the property. All harvest details and records maintained combined by landowner and by consulting forestry company.  <b>This landowner/group member runs a military veterans' camp on-site for men and women who served in US military, all branches and all engagements. Forest management work is done by landowner (Marine veteran and Camp Manager) or other veterans attending the camp or by contract, depending on the time of year and type of work to be done. Proceeds from sales used to support camp. Landowner also organizes deer hunting events, with bunk areas and food supplies for vets including the disabled. Land owner has constructed very high quality, wide trails where off-road vehicles may be used for qualifying veterans and disabled persons. Gravel has been brought in for trail construction and landowner uses only "clean" gravel after having been educated by DNR staff years ago about potential for exotic/invasives to be introduced from gravel. Landowner very involved in FMP development and actively engaged in meeting planned/scheduled treatment activities. Has had a long-term relationship with the consulting forestry company. This site was a model of landowner engagement, consultant forester quality and training, and DNR assistance.</b>	BIJ
Order #10-10-2017 Clark County	2016 harvests, stand numbers 1, 4, 5. Stand 1 Shelterwood with oak done over advanced regen, overstory removal scheduled 2022. Stand 5 overstory removal over oak. This entire order had been high graded around 1996-1997 just prior to sale and purchase by current landowner. The current and recent past harvests designed for remediation and attempts to restore quality. This is an extremely productive site with potential for very high quality northern hardwoods. Stand 4 was a small ash clearcut of 3 acres, pre-salvage of good sawlogs of good quality. EAB quarantine was enacted this winter after only 6-7 counties remained without documented EAB occurrences.	BIJ
Order #10-036-2005 Clark County	Aspen clearcut. Green tree retention. No issues. 40 acres.	BIJ
Order #10-16-2005 Clark County	Northern hardwood and oak, unevenaged system includes small stand aspen clearcut. Harvested winter, 2016-2017.	BIJ
Order #10-204-1996 Clark County	Stand 4, 31 acres. Northern hardwoods - thinning throughout with gaps cut for regeneration. Started summer and finished winter, 2016. Gas line bisects stand, no equipment over line or supposed to use pads. Logs hauled to road side located southern edge of stand so no crossing was done of the gas line. Harvested all aspen, paper birch, ash, and those marked to cut. Salvaged ash. Black River along western edge, no equipment/cut within 50' of river, within 100 feet basal area reduced to 100 sq ft/acre (following BMPs). 73.12 acres overall.	BIJ

FMU / location	Activities / notes	AUD*
Order #32-204-2007 LaCrosse County	Marked, not yet cut. Crop tree release and salvage cut old cohort with mark to cut stands of oak (5 stands) and central hardwoods (5 stands). Stands marked for future uneven-aged management. Old cohort are being damaged by winds and blown down. Intermediate & suppressed understory growing well & needs to be released. Future TSI work will be needed in the stands before the next mandatory practice occurs. Scattered invasives (barberry, mulit-flora rose, honeysuckle) are found throughout - retained shade on the forest floor should be able to contain the invasives. NHI and Arch/Cultural/Historic search completed, no hits on any of the family properties. 40 acres.	MLM
Order #32-024-2007 LaCrosse County	Marked, not yet cut. Crop tree release and salvage cut old cohort with mark to cut stands of oak and central hardwoods. Stands marked for future uneven-aged management. Old cohort are being damaged by winds and blown down. Intermediate & suppressed understory growing well & needs to be released. Future TSI work will be needed in the stands before the next mandatory practice occurs. Scattered invasives (barberry, mulit-flora rose, honeysuckle) are found throughout - retained shade on the forest floor should be able to contain the invasives. 34 acres.	MLM
Order #32-022-2007 LaCrosse County	Marked, not yet cut. Crop tree release and salvage cut old cohort with mark to cut stands of oak and central hardwoods. Stands marked for future uneven-aged management. Old cohort are being damaged by winds and blown down. Intermediate & suppressed understory growing well & needs to be released. Future TSI work will be needed in the stands before the next mandatory practice occurs. Scattered invasives (barberry, mulit-flora rose, honeysuckle) are found throughout - retained shade on the forest floor should be able to contain the invasives. 40 acres.	MLM
Order #32-019-2007 LaCrosse County	Marked, not yet cut. Crop tree release and salvage cut old cohort with mark to cut stands of oak and central hardwoods. Stands marked for future uneven-aged management. Old cohort are being damaged by winds and blown down. Intermediate & suppressed understory growing well & needs to be released. Future TSI work will be needed in the stands before the next mandatory practice occurs. Scattered invasives (barberry, mulit-flora rose, honeysuckle) are found throughout - retained shade on the forest floor should be able to contain the invasives. 133.3 acres.	MLM
Order #32-204-2007 LaCrosse County	Marked, not yet cut. Crop tree release and salvage cut old cohort with mark to cut stands of oak and central hardwoods. Stands marked for future uneven-aged management. Old cohort are being damaged by winds and blown down. Intermediate & suppressed understory growing well & needs to be released. Future TSI work will be needed in the stands before the next mandatory practice occurs. Scattered invasives (barberry, mulit-flora rose, honeysuckle) are found throughout - retained shade on the forest floor should be able to contain the invasives. 40 acres.	MLM
Order #32-046-2007 LaCrosse County	Marked, not yet cut. Crop tree release and salvage cut old cohort with mark to cut stands of oak and central hardwoods. Stands marked for future uneven-aged management. Old cohort are being damaged by winds and blown down. Intermediate & suppressed understory growing well & needs to be released. Future TSI work will be needed in the stands before the next mandatory practice occurs. Scattered invasives (barberry, mulit-flora rose, honeysuckle) are found throughout - retained shade on the forest floor should be able to contain the invasives. 34 acres.	MLM
Order #32-023-2007 LaCrosse County	Marked, not yet cut. Crop tree release and salvage cut old cohort with mark to cut stands of oak and central hardwoods. Stands marked for future uneven-aged management. Old cohort are being damaged by winds and blown down. Intermediate & suppressed understory growing well & needs to be released. Future TSI work will be needed in the stands before the next mandatory practice occurs. Scattered invasives (barberry, multiflora rose, honeysuckle) are found throughout - retained shade on the forest floor should be able to contain the invasives. 26 acres.	MLM
Order #32-046-2007 LaCrosse County	Same Rx as above. Gas pipeline runs through this order #. Logger wil not be allowed to construct roads in the easement or disturb the surface. No NHI hits. 34 acres.	MLM
Order #29-014-2012 Juneau County	Stand 1: Oak large sawtimber medium stocking. Stand 2: Red Pine Pole timber - Medium high stocking. Even-aged improvement thinning to remove high risk trees and release crop trees. Oak wilt restriction timing. In Stand 2 there are a few small pockets of declining red pine that will be removed, harvest of patch to extend 70' beyond the last fading trees. Dry or frozen conditions required. No NHI or Arch/Cultural/Historic hits. Invasives present throughout the stands. Landowner has been chemically and mechanically treating the stands to reduce the invasive	MLM

FMU / location	Activities / notes	AUD*
	<p>species, primarily glossy buckthorn, reed canary grass, honeysuckle, barberry, &amp; garlic mustard. Thinned and patch cuts have adequate release, no residual damage. Small amount of rutting on a walking path due to heavy recent rains; landowner was educated about possible BMPs for the trail. Landowner interview with John DeBaun. Member of Wisconsin Woodland Owners Association, manages his own Tree Farm website: <a href="http://brokenoakhill.com/Home_Page.html">http://brokenoakhill.com/Home_Page.html</a> Landowner not aware of the reporting requirements for pesticide use for FSC. 44.4 acres.</p>	
<p>Order #29-029-2008 Juneau County</p>	<p>Ownership transfer occurred between the sale setup and current state. Trees marked on the ground were inconsistent with the Cutting Notice (CN), which functions as the silvicultural prescription, and the CN did not match the Forest management Management Plan (FMP). The CN describes the prescription for Stand 2 as, "Unevenaged management. Group selection and improvement thinning." The prescription in the land exam and practices report states, "Shelterwood Regeneration Harvest - Preparatory cut". There are supposed to be small and large gaps in the eastern side of the stand, as noted on the map submitted with the cutting notice, (totaling 6 patches) but there was only 1 piece of flagging found and the patches were not delineated adequately on the ground. The trees marked for removal in the sale did not match the description in the cutting notice. Finally, the description of the stand contained in the FMP was not wholly accurate. This sale was marked, but not yet up for sale. Additionally, if the stream running through the site is to be crossed, must apply for a permit for stream crossing; finally the original cutting notice from 2012 was rejected, as it was considered to be high-grading of the stand. The resubmitted cutting notice was revised and previously marked trees orange cut marks were blacked out for a few trees of those viewed. 68 acres.</p>	<p>MLM RSB</p>
<p>Order #32-032-2003 LaCrosse County</p>	<p>17.17 acres treated. MFL landowner was transferred from individuals to a Trust. Inspected small patch cuts designed to move from Northern Hardwoods to Central Hardwoods cover types. The primary objective of the landowner is wildlife habitat enhancement, with a secondary emphasis on timber production. Landowner had installed several small ponds for wildlife. The latest selective timber harvest was in 2016. The stands have been repeatedly high-graded over the past, leaving poor quality trees and relatively low value, with limited marketability. The stands needed timber stand improvement to remove poor formed trees, vines and low-quality hardwoods. There were no issues with the harvest. Low risk for environmental impacts because only a limited number of trees removed. 73 acres overall.</p>	<p>RSB</p>
<p>Order #42-007-1993 Monroe County</p>	<p>The land was formerly in agriculture with central pivot irrigation. The entire site was planted in 1997 as part of the Conservation Reserve Program (CRP). Thinned in 2017 down to minimum acceptable stocking levels. The owner is in negotiations with Monroe County to sell the property to add to the contiguous tracts owned by the County. The soils were sandy and operable year-round. 80 acres.</p>	<p>RSB</p>
<p>Order #42-057-2003 Monroe County</p>	<p>The two landowners are absentee. Their primary objective for owning the property is wildlife enhancement and hunting. Inspected the clearcut of Oaks with plenty of within-stand retention. Aspen stands of 10 years old were left for a future harvest and to reduce the visual impact of the harvest.</p> <p>Todd Jensen was the local logger. It was steep ground with several skid trails positioned on steep slopes. Discussed the pros and cons of shorter but steeper trails vs. trails with switchbacks that take up more surface area. We agreed that shorter skids were preferred. The trails were well covered in slash and no erosion was observed. There were no issues with the harvest. And there was a low risk of environmental impact. 40 acres.</p>	<p>RSB</p>
<p>Order #42-007-2013 Monroe County</p>	<p>Landowner was the Regional Director of the U.S. Fish and Wildlife Services, is a former Tree Farmer of the Year and is active in sponsoring landowner tours and other education programs. He marked the 18 acre stand of Oak himself involving small patch cuts and overstory removal of the mature trees. DNR Foresters met on-site to agree on logging plan and agree on access and removal. The harvesting was conducted by a local Amish crew using chainsaws. The harvest was designed to move the Oak stand to Hard Maple cover type, eventually. Large amounts of within-stand retention</p>	<p>RSB</p>

FMU / location	Activities / notes	AUD*
	were left. There were no issues with the harvest. There was a low risk of environmental impact. 79 acres.	
Order #42-032-2013 Monroe County	The owner is a Cranberry farmer in the summer and works on his property during the winter. He conducts his own cutting, skidding and merchandising of his wood. Inspected two small clearcuts of 9 and 2 acres. Within stand retention of trees were left for regeneration and wildlife. Inspected a wildlife pond that collects runoff from the hillside and goes dry in the summer. There was a very slight amount of erosion on two of the skid trails from recent heavy rains, but had no impact on water quality. There were no issues with the small scale harvests. There was a very low risk of environmental impact. 40 acres.	RSB
Order #42-028-2012 Monroe County	Visited with landowners/group members on-site and walked the Tree Farm. Both siblings had planted most of the property in 1965 to Red Pine. The plantations were on relatively steep slopes. A local company had conducted a second thinning of the pine stands and small patch of aspen in 2016. The landowners were excellent spokespersons for forestry and had good reviews of the DNR Foresters. They had employed consultants to help mark the timber and set up recent timber sales. The landowners are active in controlling invasive species with herbicides. They are enthusiastic hunters and enjoy wildlife and deer hunting. There were no issues with the harvest. Skids trails were water-barred and maintained. There was a low risk of environmental impacts. 159.997 acres.	RSB
Order #42-021-2010 Juneau County	Met with landowner on-site and toured the property. Harvesting involved an overstory removal of Ash trees infected with Emerald Ash Borer. Observed large stumps of oaks and other hardwoods. Many trees were left, some of poor quality, including many White Pines. The management objective was said to be regeneration of the Oaks. Hunting pressure in the area is high and deer browse was not expected to be a problem. Landowner was concerned that several cut pines were not removed and that some of the larger and older trees should have been removed during the harvest. He is considering bringing another logger in to look at the property to explore additional cutting. DNR said he would bring an increment corer and investigate the quality and growth of the remaining trees. The landowner felt that his objectives were met. He utilizes firewood to heat his home. No issues. 76.13 acres.	RSB
<b>Date: Wednesday, June 13, 2018</b>		
Order #37-30-1996 Marathon County	Cutting notice submitted in 2012, and the harvest occurred in 2017. The forester had noted the red pine plantation and sent reminder letters to the landowner each year beginning in 2015 about the need to harvest. Land exam was conducted following harvest. Some suppressed pines were observed in the harvested area. New food plot (recently plowed and planted) at far edge of pine stand; large quantity of slash from the food plot, including tree stumps, has been pushed into a draw. Order number includes an aspen stand clearcut with very thick regeneration (trees at least 15-feet tall, so they were cut several years ago). A second large rectangular food plot occurred at the edge of a selective cut of hardwood; this was another area that has been cut very lightly, as relatively few stumps were found. Second large aspen cut was observed, which was in accordance with cutting notice. The north edge of the property along the aspen cut was confirmed to follow a fence and be clearly marked. Management plan up to date.	SBE
Order #37-215-1996 Marathon County	Same landowner as #37-30-1996, described above. Unclear if harvest had occurred, as few stumps were found. It is a small area in a bottomland area along a trout stream comprised of low-grade trees. Unclear if recon has been completed. Cabin onsite between the two order numbers. Management plan up to date (same management plan as #37-30-1996 above).	SBE
Order #37-110-2005 Marathon County	Tamarack, spruce, and balsam fir cut in wet area. First cut in 2009 (strip cut). Harvested in winter, which is typical of highly-organic and moist soil. Included a 16-acre tamarack swamp cut with sphagnum moss and forbs; some pine, as well as red maple observed. Good regeneration. Forest access road used for logging was hardpacked gravel, which led to a mowed trail.	SBE
Order #37-051-1995 Marathon County	Interviewed forestry consultant and a summer intern. Single tree selection harvest to create small gaps. Markings had been conducted in accordance with the standard Order of Removal with highest risk trees removed first. Consultant is well versed in identifying archeological sites, and none were	SBE

FMU / location	Activities / notes	AUD*
	found at on this FMU. Harvest occurred in summer using a rubber-tired Ponsse forwarder and processor with a fixed head. Site had been opened around the building onsite, at the landowner's request. The site includes numerous vernal pools, but they were dry during the harvest; no sign of negative impacts to the vernal pools were seen. The Northern hardwood stand received a highly-selective cut, with at least one wildlife tree left per acre (targeting cavity trees). Also at the landowner's request, all hemlock trees were left uncut, as they serve as roosts for turkey. A new driveway had been built to the highway for the hauling, and the landowner got a permit from the county for the driveway.	
Order #37-082-2012 Marathon County	Cutting notice and on-the-ground implementation of plan includes mitigation of NHI bird species. Unclear is how post-harvest recon occurred. This was a hardwood thin. Gravel had been placed in most, though not all, low areas on the main forest roads; there was minor rutting and minor soil compaction at places on the road. A small intermittent drain crossed the road, and no evidence of erosion was observed. The western boundary of the property was marked with orange paint and flagged, as well as had "No Trespassing" signs. Evidence of vernal pools and water drainage area with no sign of equipment entry. Wildlife trees observed. Order number included a 13-acre aspen clearcut and a selective thin at the edge of the clearcut. Natural buffers between the clearcut and a pond were used to protect aquatic values. A small stand of jack pine had not been thinned, although it was listed in the order number. The FMU includes a right of way for snowmobiles in a field abutting the harvested area.	SBE
Order #37-236-2000 Marathon County	Mitigation for an NHI occurrence was to not allow harvesting between March 15 and July 31. The cutting report had been submitted in June, so it can be assumed that cutting occurred before the March 15 requirement. However, since the cutting notice do not include the dates of harvest, there is no way to know for sure (i.e., there is no record of when the harvest occurred). The harvest was a mixed hardwood selective cut. Several wildlife trees were observed. Natural boulders scattered throughout FMU. There were some pockets of downed basswood, perhaps caused by wind. Stump-sprout maple occurred, and much of the stand was very dense. The forest management plan is up to date.	SBE
Order #44-114-1998 Oneida County	Stands 145, 166, 191, 214, 173. Mature red pine forests, thinning for growth of retained crop trees, reduction of under- and mid-story woody competition and to open stand in effort to encourage natural regeneration of red pine. Small red and white pine regeneration openings/gaps created in canopy. Released advanced regeneration of red/white pine. Basal area reduced to 70-110 sq ft/acre depending on initial basal area. Harvest boundaries marked in red paint, cut trees marked with orange paint. Ski trails throughout area buffered by 75-100 foot-buffer for visual quality management. FMP/Cutting notice/Implementation all consistent. Cooperator with American Bird Conservancy allowing researching to conduct golden-winged warbler and Kirtland's warbler surveys in young forests created by older harvest projects. 1393.65 acres.	BIJ
Order #44-036-2013 Oneida County	Two areas harvested. One stand was an aspen coppice harvest with 20 sq ft/acre average green tree retention of red oak, red/white pine, and red maple. Trees marked to keep, sale boundaries painted. In another area there were storm damaged trees harvested with special care during harvest for trees immediately around the owner cabin. Lake buffer widths checked and confirmed in conformance with riparian protection best management practices. Invasive honeysuckle noted and reported to landowner. NHI check discovered a bird of special concern but review process identified it was well outside of property. Procedures noted for reporting any sightings of identified bird. Cutting notice form includes signatory boxes that are outdated relative to Act 358 changes. Landowner interview, issue with knowledge of role and responsibilities. 112.81 acres.	BIJ



FMU / location	Activities / notes	AUD*
Order #64-006-2015 Vilas County	Stand 2, 10 acres, red pine stand, even-aged management. Thinning reduced basal are to 80 sq. ft/acre of quality sawtimber trees. Jack pine and aspen removed. Small area of jack pine retained as cover for advanced regeneration of white pine. Trees marked to cut. Stand 3 decadent jack pine stand, harvested all jack pine, balsam fir, black spruce and aspen except green trees retained for wildlife at about 3 large canopy trees per acre. Anchor chain to prep site for jack pine regen which was now abundant since the harvest last year. Aspen regen abundant through all cutting areas although at lower density in anchor chain area. Spotted knapweed found by consulting forester and treatment information included. Logging equipment cleaned prior to and after logging. 50 acres over all.	BIJ
Order #64-028-1999 Vilas County	Red pine thinning, 35 years old, 1st thin. Every other 3rd row removed, creating future access lanes and trees thinned in between rows marked to remove by landowner leaving best quality potential sawlog pines. Property has multiple easements including for spruce grouse management and Upper Wisconsin River Legacy Forest of the Forest Legacy Program. Special management provisions regarding recreational use; hunting and trapping; access modifications, and monitoring apply. 400 acres.	BIJ
Order #64-209-1998 Vilas County	Dry sandy site, jack pine and jack pine/aspen stands harvested 2015. Abundant regen throughout, vigorous aspen regrowth. Jack pine seedlings, 2-2 stock, planted by crew, 33,000 seedlings from Boscobel State nursery using native tree stock. Disc trenched prior to planting. Landowner publisher of "Partners in Forestry" and member of Wisconsin State Forest Advisory Committee. acres.	BIJ
Order #35-017-2012 Lincoln County	Met with the landowner and walked the single tree selection harvest over portions of the 40 acres. The landowner is a former professional logger. The landowner objectives include "practice sound forestry and enhance wildlife habitat." Inspected the Plan Packet Review Checklist. The Cutting Notice was reviewed and signed in August 2014. The Management Plan had been updated in 2012. The thinning appeared to be excellent with trees free to grow. It was logged in winter due to a few low spots draining into the Wisconsin River system. Road access was very good, using old railroad grades. An NHI hit indicated the possible presence of a Goshawk, but no evidence of the species being present was found.	RSB
Order #35-057-2003 Lincoln County	Inspected three small clearcut patches including: Stand 1 at 6 acres, Stand 2 at 6 acres and Stand 3 at 10 acres. The prescription was to remove all mature Aspen. Many residual trees left for wildlife and visual quality protection. Inspected the ephemeral stream, marked with red paint, and with good protection on both sides. The NHI indicated a possible Goshawk, but none was found on-site. 76 acres.	RSB
Order #35-001-1993 Lincoln County	No forester and no loggers have been used in recent years. The main activity has been cultivation of Balsam Fir Christmas Trees on the front 8 acres. Met with landowner and his son who have tractors, a skidder, power mower and shearing equipment. Landowner was awarded the Wisconsin Tree Farmer of the Year in 1995 and have been very active in the Wisconsin Woodland Owners Association. Walked the tree farm discussing plans to thin out the over mature aspen. We discussed the landowner objectives of wildlife enhancement, managing forest health and production of Christmas Trees. Inspected a hunting shack on the property, along with several deer stands. They are exploring markets for 18,000 Tipi Poles to assist with the thinning. The DNR Forester and consulting forester discussed getting together soon to update the plan and begin the Aspen thinning project later in the year. 78 acres.	RSB
Order #35-047-1996 Lincoln County	Tom Loka, Lincoln County. Order No. 35-047-1996. 80 acres. No professional forester has been involved. Used a FISTA Trained logger from local company. Inspected the 50 foot no touch buffer around a shallow lake. A harvest was recently conducted with an approved Cutting Notice to leave the White Pine, Oak and Red Maple. Many residual trees were left for wildlife and aesthetic considerations. The plan called the harvest a clearcut, and was a modified clearcut with retention.	RSB

FMU / location	Activities / notes	AUD*
Order #35-021 1998/#35-001-2000 80/18 acres Lincoln County	Interviewed the logger conducting the salvage operation of a 63-acre red pine plantation. Interviewed the operator running a forwarder and the chipper. Die-back of the Red Pine started to occur in 2014, following an extreme drought in 2013. The mortality continued to spread across the tract with thin crowns and dead tops. The DNR Forest Health Specialist conducted a survey and took samples and concluded that the mortality was due to drought stress and that the trees were weakened and would likely continue to die. Inspection of the site indicated that too close of spacing, in combination with the drought, likely caused the mortality. The weakened trees had become susceptible to the Turpentine Beetle. The entire tract, involving two MFL Order No's., is currently being salvaged logged. Plans are to replant with a different mix of species and spacings. There were no waterbodies close to the upland site that had formerly been in row crops. The DNR brought multiple professionals to assess the situation and the landowner have effectively responded to the forest health issue. 80 / 18 acres.	RSB
Order # 35-049-016 Lincoln County	Set up, not logged. The property was new to MFL in 2016. The site had no activity for about the past 40 years. The stand has been marked and is ready to cut during dry conditions. The landowner wants to retain several large White Pine trees and advance natural regeneration. The tract file contained the Application Form Checklist and the Land Exam & Practices Report. There were no issues due to the lack of activity. Harvesting will be limited to dry conditions due to the steep slopes. 35 acres.	RSB
	Stop # 20: Order No. 35-062-2017. 68 acres. Clearcut with good retention of White Pine and patches of other tree species and understory. The landowner marked the site, including the 100-foot buffer along the stream. Large number of trees retained at the direction of the landowner. The harvest was also shut down due to adverse weather conditions.	RSB
	Stop # 21: Lincoln County. Order No. 35-050-2010. 159 acres. The logger was arranged as part of a purchased stumpage contract. Objective was to remove the mature Aspen while shifting the forest to more of a red maple type. Inspected several small patch cuts and single tree selections. The consulting Foresters shut the harvesting down several times due to excessive rainfalls. One landing used mats to avoid disturbance to the soil. Wolf tracks were seen on several sites. Inspected a two-acre wetland area containing a food plot that had to be permitted. The road system was very well rocked and stable. Large culverts were used to cross the perennial stream with rock armoring. Some portions of the road system were overgrown and in need of future brush control to allow sunlight to dry out the road.	RSB
	Stop # 22. Lincoln County. Order No. 35-049-2010. 159 acres. The same systems of forest management and harvesting were used on the previous property. Inspected several patch cuts and selection harvests as on the property. The property was recent sold to new landowner and the transfer of the MFL property is currently ongoing.	RSB
	Stop # 23. Lincoln County. Order No. 35-288-1999. 80 acres. Consulting forester marks his own timber, has his own portable sawmill and takes care of forest management. A 100 foot no-touch buffer strip was delineated along a trout stream. Single tree and group selection was occurring to accomplish crop tree release and move to an uneven aged forest. Most aspen and white birch are mature and are being removed. The logger used slash and debris to cover and protect the skid trails. The road needed additional rock to cover low spots and fill holes.	RSB
Order #61-064-2005 Taylor County	73-acre red pine intermediate thinning. Trails in good shape, balsam and ironwood removed if 4" and greater. DNR Forest Health Specialist consulted - Red pine patches removed have preliminary results for forest pathogens (armillaria, red turpentine beetle, and pine engraver) samples were sent for further testing. Red pine, white spruce, & balsam fir stumps were treated for HRD prevention with an approved fungicide and pine & spruce must be hauled within 2 weeks of being cut during 1 May and 30 Aug. Hand application of Remedy Ultra for honeysuckle control. One NHI hit was within a 1-mile buffer, but was outside the harvest area and was determined would not be affected by this project. 73 acres.	MLM
Order #61-066-2005 Taylor County	58-acre red pine intermediate thinning. Trails in good shape now, but logger had to come back and repair rutting on main roads after harvest. Slight residual damage to the retained stems. DNR	MLM

FMU / location	Activities / notes	AUD*
	Forest Health Specialist consulted - Red pine patches removed have preliminary results for forest pathogens (armillaria, red turpentine beetle, and pine engraver; samples were sent for further testing. Red pine, white spruce, & balsam fir stumps were treated for HRD prevention with an approved fungicide and pine & spruce must be hauled within 2 weeks of being cut during 1 May and 30 Aug. Hand application of Remedy Ultra for honeysuckle control. One NHI hit is within a 1-mile buffer, but is outside the harvest area and will not be affected by this project. Intermittent stream buffered. 58 acres.	
Order #61-034-2013 Taylor County	Stand 1: 26-acre Selection harvest - cut all marked trees, all aspen & balsam fir harvested. Stand 2: 34-acre Regeneration harvest - cut all stems 2" and greater, retaining oak, pine, hemlock, spruce and any green marked trees. Perennial stream bisects the stands with buffer viewed and respected. Retained trees in good health, adequate regeneration viewed. NHI and Arch/Cultural/Historic search completed, no hits. 159.9 acres.	MLM
Order #61-021-2004 Taylor County	Site borders the Black River. SMZ respected and only trees, primarily ash, immediately roadside (historic road) were removed on the river side of the sale. Multiple forested wetland fingers throughout the interior of the sale; operator maintained good distance and respected the wet areas. NHI and Arch/Cultural/Historic search completed, one natural community hit, but outside the sale area and no effect is expected. Stand 1: 9-acre Single tree selection harvest - cut all marked trees, bottomland hardwood, maintaining an un-even age mixture of tree species. Stand 2: 17 acre Thinning cut - cut all marked stems. 5 canopy gaps created throughout the stand to help regenerate hemlock. Some glossy buckthorn was present on the field side of the property and should be treated before more enters the stand. 41.21 acres.	MLM
Order #61-015-2002 Taylor County	54-acre cut - Stand 1: Spruce thinning and seed tree harvest with reserves. NHI and Arch/Cultural/Historic search completed, no hits. Processor cut in the winter of 2017-2018 cut, good regeneration already observed. Poorly drained soils with large amounts of bunchberry and dwarf raspberry present. Historic road bisects the trail and buffer of lake is well respected. Good amounts of slash used in soft soil conditions on trails. Sandhill cranes observed near site. Land Exam updated for mandatory practices, but text portions of the Forest Management Plan not yet updated. 40 acres.	MLM
Order #61-007-2009 Taylor County	10-acre aspen clearcut. Practice completed 1-2 years early because of the large amount of blowdown from a previous wind storm. Landowner Gary Lindholm present. Trails clear and stand has some retained stems that are protected and undamaged. Intermittent stream on the east side of the sale flagged and respected, RMZ for the adjacent Big Rib River is to the south of the sale and sale boundary is marked and distances sufficiently far enough away that the river buffer is not impacted. NHI and Arch/Cultural/Historic search completed, no hits. 70 acres.	MLM
<b>Date: Thursday, June 14, 2018</b>		
Order #37-042-2015 Marathon County	Joined by three DNR staff for the full day. Interviewed landowner onsite. Main roadway accessing stands is planted with clover to attract deer. Clover acquired from American Seed, and the area is outside of the boundary of the section enrolled in the MFL program. Site is farmland that has been converted to pine and aspen stands. Two aspen clearcuts occurred in 2016, and the spruce stands were selectively harvested. Even after thinning, the spruce stands were of high basal area. The FMU was logged in the summer with a rubber-tired Poncee. Both aspen clearcuts showed good regeneration of aspen; lots of forbs including sedges observed. Logger had left a large hardwood tree with a deer stand in it. Forest management plan is up to date.	SBE
Order #37-085-2013 Marathon County	No logger listed on the cutting notice. Access trail in good shape and clearly marked with blue paint. A portion of the harvest occurred along the property line. Many trees on the adjoining landowner's property had been cut along the fence and clearly marked property line; further investigation with DNR staff did not reveal any timber trespass, so the presumption is that the adjoining landowner harvested those trees. Stand 2 includes good regen of white pine. Around marsh, several sizeable stumps were found with no sign of having been painted per the prescription. However, the volume	SBE

FMU / location	Activities / notes	AUD*
	removed from around the marsh is consistent with the prescription, and there was no sign of erosion. Wildlife trees with cavities left onsite. Forest management plan is up to date.	
Order #37-039-2010 Marathon County	Aspen clearcut with several overstory trees retained and good regen resulting. Forest management plan up to date. Property boundaries are clearly marked with pink flagging. In mixed pine and hardwood stand left significant quantities of small, poor-quality trees. Small seep on the road below the upper clearcut with some erosion on the road observed. Culverted crossing of spring-fed stream with significant sedimentation on the upstream side, and a pool downstream. RMZ is well stocked. Creek is low grade and highly silted. Numerous trees in the RMZ were painted but not cut. A pond and very large shed were observed; the shed is used to store farm equipment. Evidence of significant erosion in road, extending at least 250-feet; the rutting had carried sediment directly to the stream ( <b>Non-conformity</b> ). Second aspen clearcut with good regen and several overstory trees retained.	SBE
Order #44-039-2015 Oneida County	Oak shelterwood down to 40%-60% canopy retaining mature, quality canopy red oak as seed source, trees marked to cut. Trees marked to cut. Existing red oak regeneration in understory. Landowner interview. 35 acres.	BIJ
Order #44-044-1990 Oneida County	Red pine thinning on 18 acres. First thin in 30-year old plantation, every 3rd row thin to establish access rows. All jack pine and aspen removed (very small amount). New road inspected. 39 acres.	BIJ
Order #61-020-2011 Taylor County	Stand 4: Aspen clearcut, with retention of oak and long-lived conifers. Cutting notice completed by landowner, therefore automatically triggers a DNR MFL Forester review. Good oak retention and residual. Aspen regeneration is adequate to good, some browse on aspen regeneration. Wetland swale/intermittent drainage (not true intermittent stream) present and bisects the stand, with a small amount of cover retained - additional shade could have been retained on the wetland/drainage area, though not required. Boundaries flagged, corner marked, and backside of stand delineated with a cover type change. NHI and Arch/Cultural/Historic search completed, no hits. 80 acres.	MLM
Order #61-036-2002 Taylor County	Stand 1: 80 acre marked selection cut includes 2 aspen patch cuts totaling 8 acres. All aspen and fir to be cut. Thinning looks good with slash low. Very large no-cut buffer on the Big Rib River, much greater than 100'. No invasives viewed or noted. NHI and Arch/Cultural/Historic search completed, no hits. 80 acres.	MLM
Order #61-002-2017 Taylor County	99-acre larger sale: 80-acre thinning with 2 aspen patch cuts, totaling 8 acres. Mink Creek divides the property, sale boundary was held back from the creek between 35-100' depending on the terrain. North of Mink Creek is an intermittent stream; sale boundary was held back approximately 35' depending on the terrain. Logging conducted on frozen ground to reduce soil disturbance. Some honeysuckle present on the south 40, logging to be finished on that portion to avoid spreading invasives throughout the site. Mixed hardwood understory regeneration present. Ash makes up a larger component, however this will likely act as a 'nursery' for the oak seedlings, then as the ash die back in the next 1-5 years, the oaks will have increased sunlight to grow. Permitted stream crossing was viewed, banks undisturbed, some tag alder pushed up on downstream right bank, unknown if it is from normal runoff or placed after stream crossing was removed. Viewed temporary bridge permit #IP-NO-2016-61-01846. BMPs at bend in main haul road upstream of stream crossing. Some minor erosion and sedimentation in the road tracks, down to the larger rocks at one spot. Sediment has only moved a small amount and is away from the stream. NHI and Arch/Cultural/Historic search completed, no hits. 26 acres.	MLM
	Stop # 18: Lincoln County. Order No. 35-012-2012. 40 acres. Landowner has donated the property to the North Central Conservancy. The harvesting plan was to conduct single-tree selection to remove Aspen and Balsam Fir. Red Oaks and Hemlocks were to be left. There was no water, no NHI hits and no archeological/historical sites. There were three small patches including: Patch 1 of 17 acres, Patch 2 with 16 acres and Patch 3 with 6 acres. The remaining trees were free to grow and there was good regeneration within the patches. There was minor deer browse. There were no issues with the harvest and there was a very low risk of environmental impacts. 40 acres.	RSB

\*AUD = auditors, SBE = Stefan Bergmann, BIJ = Beth Jacqmain, MLM = Michelle Matteo, RSB = Scott Berg

### 3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	10 (5 x 2 auditors) 8 (4 x 2 auditors)
B. Number of auditors participating in on-site evaluation:	4
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
<b>D. Total number of person days used in evaluation:</b>	<b>21</b>

### 3.1.3 Evaluation Team

<b>Auditor Name:</b>	Beth Jacqmain	<b>Auditor role:</b>	FSC Lead Auditor/ATFS team
<b>Qualifications:</b>	Beth Jacqmain is a Certification Forester with SCS Global Services. MS Forest Biology/Ecology from Auburn University and BS Forest Management from Michigan State University. Beth has 20+ years’ experience in the forestry field including public land management, private consulting, and private corporate. Qualified ANSI RAB accredited ISO 14001 EMS Lead Auditor and a qualified FSC Lead Auditor for Forest Management/Chain of Custody. Audited and led FSC certification and precertification evaluations, harvest and logging operations certification evaluations, and has participated in joint PEFC and American Tree Farm certifications. A 9-year member of the Forest Guild, 20 year adjunct-Faculty with Itasca Community College, Natural Resources Department. Jacqmain’s experience is in forest management and ecology; ecosystem silviculture; the use of silviculture towards meeting strategic and tactical goals; tree regeneration; forest timber quality improvement, conifer thinning operations, pine restoration, and fire ecology in conifer dominated systems. Beth has experience in forest ecology and management in the Midwest, Pacific Northwest, and the southeastern US (oak ecology in longleaf pine-wiregrass systems).		
<b>Auditor Name:</b>	Michelle Matteo	<b>Auditor role:</b>	ATFS Lead Auditor/FSC team
<b>Qualifications:</b>	Michelle Matteo is a Forest Management Senior Lead Auditor with experience conducting audits for large and small private and public landowners. Michelle also conducts Lead Auditor Chain of Custody audits under the SFI, FSC, and PEFC Standards with experience conducting hundreds of COC audits for a broad range of manufacturers and distributors. She is also a Qualified Lead Auditor for SFI 2015-2019 Standard audits for procurement and land management. Michelle is a forester, biologist, and arborist and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Certification, and is a current member of the Society of American Foresters. She has a background in urban and traditional forestry, wildlife biology, and watershed science, and has experience with both state and federal environmental regulations. Michelle earned her MS in Forestry and BS in Wildlife & Fisheries Biology from the University of Massachusetts in Amherst.		
<b>Auditor Name:</b>	Stefan A. Bergmann	<b>Auditor role:</b>	FSC/ATFS team
<b>Qualifications:</b>	Mr. Bergmann has been in the forestry and wood products field for 15 years, working across the US in forest policy, landowner extension, executive leadership, and forest certification. Prior to joining SCS in July 2017, he worked for another certification body, overseeing the Forest Stewardship Council™ (FSC®) Forest		

	Management auditing program in the US. He has successfully completed FSC Forest Management Lead Auditor training, ISO 9001 Lead Auditor training, and is qualified to be a team SFI Auditor. He has participated as an auditor on several forest management audits around the US. He holds a BS in Wildlife Science and an MS in Forest Resources, both from Oregon State University, Corvallis, Oregon, USA, and is presently pursuing an MBA at the University of California Davis.		
<b>Auditor Name:</b>	Scott Berg	<b>Auditor role:</b>	FSC/ATFS team
<b>Qualifications:</b>	Mr. Berg is the principal in the international consulting firm, R.S. Berg & Associates, Inc. that provides a full range of consulting and auditing services to the SFI, FSC, ISO 14001 EMS and Tree Farm Certification Standards. He has over thirty five years in the forest and paper industry working for national and regional trade associations, and as the owner of a consulting firm. He has had major responsibilities in developing and implementing the Sustainable Forestry Initiative Standard and Certification Procedures, as well as the American Tree Farm System Group Certification Program. He has prepared approximately two hundred (200) clients to achieve independent certification to the Standard of their choice. He is an ISO 14001 trained Lead Auditor and has conducted approximately forty internal and independent audits to the full range of forest certification Standards. He has represented the U.S. forest and paper industry before a number of international standards bodies including: Technical Committee 207 of the International Standards Organization (ISO), the Economic Commission for Europe (ECE) Timber Committee, and the Pan European Forest Certification Council (PEFCC). Scott has also represented the forest and paper industry before congress		

## 3.2 Evaluation of Management System

### 3.2.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME’s conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

### 3.2.2 Pre-evaluation

A pre-evaluation of the FME *was not* required by FSC norms.

A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

### 3.3 Stakeholder Consultation Process

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Principal stakeholder groups are identified based upon results from the pre-evaluation (if one was conducted), lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders in this evaluation:

#### 3.3.1 Stakeholder Groups Consulted During Evaluation for Certification

FME Management and staff	Pertinent Tribal members and/or representatives
Consulting foresters	Members of the FSC National Initiative
Contractors	Members of the regional FSC working group
Lease holders	FSC International
Adjacent property owners	Local and regionally-based environmental organizations and conservationists
Local and regionally-based social interest and civic organizations	Forest industry groups and organizations
Purchasers of logs harvested on FME forestlands	Local, state, and federal regulatory agency personnel
Recreational user groups	Other relevant groups

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

#### 3.3.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

Stakeholder Comment	SCS Response Plan
The use of GMO-derived food plot plants continues to be an	Food plots are excised and are not under scope of the FSC certificate maintained by the MFL. See page 21-6 of the Forest Tax Law Handbook (2017). The audit team also notes that the risk of

<p>issue that may violate FSC’s policy against the use of GMOs.</p>	<p>GMO planting on hunting food plots and subsequent escape is a low risk.</p>
<p>The 20% non-productivity rule in MFL program is good for landowners.</p>	<p>This comment references MFL Eligibility Requirements as required in the Wisconsin Forest Tax Law Handbook (2450.5, 2017), the current version is available online here, <a href="http://dnr.wi.gov/topic/ForestManagement/documents/24505.pdf">http://dnr.wi.gov/topic/ForestManagement/documents/24505.pdf</a>. This rule states, “No more than 20% of each forest parcel can be unsuitable to produce timber products, including non-productive lands (NR 46.17(1)(b), Wis. Adm. Code).” In 2016 the Handbook was updated to include a new withdrawal rule (page 10-12), “Landowners can now withdraw land for productivity and sustainability if the land has become less than 80% productive or more than 20% unsuitable for producing merchantable timber due to environmental, ecological, or economic factors.” Although note, “Landowners may be required to attempt a restoration plan for areas that can be restored if the land has become less than 80% productive due to a natural disaster. A withdrawal tax and fee may not be assessed for this type of withdrawal.” During the 2018 evaluation, the DNR provided rationale and noted this provides more flexibility for landowners while maintaining integrity of the program. No non-conformity to the FSC standard was found relative to this change.</p>
<p>The new opting in approach for the MFL program that the DNR now uses is good because it shows landowners that it’s not just a tax program.</p>	<p>This change was intended to confirm consent of landowner/group members to participate in the program. It also fosters better understanding of group member responsibilities by encouraging informed participation. According the Tax Law Handbook, between 2005 and 2015 MFL participants had been automatically enrolled in the MFL Certified Group. However, since 2015, a landowner must voluntarily apply for membership in the certified group through the MFL application for entry process (Form 2450-194), during the MFL transfer process (Form 2450-159), or for existing MFL owners – through the Application for Certified Group Application/Departure Request (form 2450-192).</p> <p>These forms state that the landowner agrees to designation in the certified group, has a desire to manage the land consistent with certification standards, intends to comply with relevant laws, agrees to the group program dispute resolution process, and consents to allow access to the property for purposes of MFL and group member inspection. The forms provide the information that the landowner may market forest products as “certified” by participating in the MFL Certified Group. This change and awareness by landowners is considered as evidence of conformance with requirements of the FSC standard for group entities that responsibilities are clearly defined (FSC-STD-30-005, 2.1).</p>



<p>Don't like the doubling of minimum acreage to be in the MFL program from 10 to 20 acres. This negatively impacts forestry consultants who work with small landowners.</p>	<p>Comments were received both negative and positive for this change. This and related comments refer to changes in the Forest Tax Law enacted in 2016 resulting from the 2015 Wisconsin Act 358 that made a number of changes to the MFL program. In this the minimum acres to enroll in the program was changed as follows, "The minimum acreage requirement per MFL parcel has been increased from 10 to 20 acres for all 2017 and future entries (page 10-13)." While this requirement restricts landowners from entering the program with less than 10 acres, pre-2017 MFL landowners seeking to renew their land in the program may be eligible for a one-time exception to the 20-acre requirement. Note this change was legislatively mandated with which the MFL group must comply.</p> <p>For group operations and structures FSC does not prescribe how groups choose to organize and structure entry into group certification programs. Group entities must provide clear, transparent rules and ensure consistency in their application in confirming eligibility requirements. These and other changes were enacted through legislative mandate over which the group managers do not have control. No non-conformity to the FSC standard was found specific to this change. However, it should be noted that the MFL program plans to initiate increased landowner engagement and education and could include information around this rule change to landowners better understand the rationale. See Observation 2018.2 and Minor CAR 2018.6.</p>
<p>The state benefits from having the MFL program certified because the DNR gains carbon credits for it.</p>	<p>Although neither the DNR nor landowner/group members currently gain any specific carbon credits (payments) from growing trees and maintaining forests specifically for carbon storage through the MFL certification program, carbon storage is an acknowledged benefit of forest maintenance and management as noted under 5.5.a of the FSC Forest Management standard.</p> <p>Trees, individually, and forests as ecosystems, are widely understood to be significant sink for terrestrial carbon storage. As such these forests provide carbon storage and other ecosystem services. Carbon credits are a specific form of payment system for providing carbon storage above and beyond a defined standard, or baseline, level. Without a tax incentive program such as MFL, many private landowners may convert forests to agricultural and other "higher and better" uses. These ecosystem services include watershed filtration and protection, wildlife habitat creation, carbon sequestration, biodiversity, soil productivity, recreation opportunities, and so on. Wisconsin taxpayers receive other benefits in the form of reduced drinking water treatment costs, improved habitat for game species, and a regular flow of timber which supports large primary and secondary processing industries in and around Wisconsin.</p>

<p>As a landowner, I'm very happy with the MFL program. People don't get into the program because they are concerned that the DNR will tell them what they can and can't do on their property, but this is not the case at all. The DNR is great to work with. [Note: Positive input from participating landowners was universal for all auditors across all landowner engagements.]</p>	<p>Auditors received mostly positive feedback from landowners who reported finding DNR staff to helpful, professional, and knowledgeable about forest management and the MFL tax law program. This is noted as evidence of DNR fulfilling its responsibility as group managers under C2 of the FSC group entities standard (FSC-STD-30-005).</p>
<p>I don't know much about certification. The DNR doesn't have enough staff to talk about certification. (Landowner)</p>	<p>DNR is currently reviewing landowner communications and is actively seeking improvements in communicating about certification opportunities to participate and responsibilities for current participating landowners, see Minor CAR 2018.6.</p>
<p>Since the DNR is actively reducing its administration of the MFL program, it is not at all clear that oversight will be sufficient to ensure program integrity. It was already difficult at the higher staffing levels of the immediate past. It is not clear that staff reduction was the best decision for ensuring long-term integrity of the program.</p>	<p>This comment and questioning of DNR's ability to maintain the MFL program integrity was raised by several stakeholders. The changes instituted in the organization and structure of the program have, so far, not broken down other than a minor, isolated BMP issue (see CAR 2018.1). However, auditors noted that most of the timber sales and sites inspected during the 2018 audit were set up using systems established prior to passing of the 2015 Wisconsin Act 358 which is currently being codified for implementation. As such sites inspected in 2018 were managed and monitored by personnel and consultants established under the older system. The 2018 audit identified several key areas regarding group manager and landowner responsibilities (See Minor CARs 1.4 and 3.2 and Observation 2.2). The audit team found this to be an area that was difficult to evaluate so because significant changes to the program for requirements related to Forest Management Plans, Cutting Notices and Cutting Reports have not yet been fully codified. This will remain an area for evaluation at the next annual surveillance audit.</p>
<p>The change to the law 2 years ago that allowed for automatic approval of the MFL cutting notice greatly handicapped the DNR's ability to administer the program. It is now very easy for individuals to implement non-sustainable forestry practices, intentionally or not. The landowner is ultimately responsible for the management of their property. Many landowners rely</p>	<p>This concern is like the one above and this change collectively constituted the greatest concern expressed by stakeholders for the 2018 evaluation. Thus far, breakdowns in conformance of harvested sites in the field were isolated and minor, see Minor CAR 2018.1. The changes in landowner responsibilities was noted as a key area for continued focus as a result of the 2018 audit, see Minor CARs 1.4 and 3.2 and Observation 2.2.</p> <p>It should be noted that input was received from private professional foresters and the private family forest landowners that the MFL program is "more streamlined". This was meant that it supports and enables better compliance with mandatory practices designed towards meeting management plan objectives that are</p>

<p>completely on professional foresters and loggers to help them comply with the rules. It is now easier than ever for an unscrupulous individual to take advantage of a landowner or help them implement a practice that does not follow proper sustainable forest management. I have not found any instances of this, but I believe it will and is occurring and could jeopardize the group certification of the MFL program.</p>	<p>required to be articulated in Forest Management Plans of the MFL program.</p>
<p>DNR field staff are inundated and cannot review all that needs to be reviewed on the MFL properties.</p>	<p>Staff work-loads and responsibilities were specifically examined during the 2018 audit and no non-conformities were determined to be warranted at this time. The DNR has adopted an approach of innovation trying many different techniques and methods to both prioritize and manage workloads. The audit team found this to be difficult to evaluate because the program is undergoing significant changes that have not yet been fully instituted or implemented nor have they proven fundamental failures to conform the to the relevant FSC standards. See section 1.6 of this report for a list of applicable FSC standards.</p>
<p>“I’m concerned that DNR staff don’t provide unbiased information to landowners about FSC certification. When we did two harvests on our FSC-certified MFL lands, and never has certification come up in the discussion with the DNR.”</p>	<p>DNR acknowledges that landowner information could be improved and has started an initiative to improve communications with landowners, see SCS review of Observation 2017.1 and new finding under 2018.6.</p>
<p>I’m really disappointed by how the administration has likely coached staff to be agnostic on certification. While this would not have changed the way we marked the timber, the fact that wood that could have been labeled certified but wasn’t, is interesting. Somewhere, whether, DNR forestry staff, the consulting forester, the purchasers, or loggers must</p>	<p>DNR acknowledges that landowner information could be improved and has started an initiative to improve communications with landowners. DNR staff remains conscious that these are privately owned lands and that the landowners choose whether they want to certify their lands or not. The DNR responsibilities are clear as group manager which does not include “marketing” or selling landowners on any specific certification programs (note the MFL certification program also certifies to another forest management certification system, the American Tree Farm System.</p>

<p>feel that tracking the chain of custody is not worth the effort.</p>	
<p>Since the law was changed that new MFL enrollees need [are required] to elect to be certified, I wonder how many DNR staff promote the benefits of certification. I also wonder how certification is discussed during certified cooperator forester training?</p>	<p>See response to comment above.</p>
<p>A huge part of the backlog of mandatory practices is due to two factors: markets and weather. Wet sites that have to be logged in the winter have gone unharvested for many years because of the lack of weather conditions favorable to freezing the ground. Going hand in hand with that is the fact that many of those sites have low-value timber and loggers are not interested in it or simply cannot market it. Through simple supply and demand, low ground sites with low-value timber are difficult to impossible to have harvested because it is not economically viable for the loggers to cut them. Most loggers have more than enough work and are not interested in logging sites that are difficult and require extra time and other expenses to get the harvesting done. I believe it should be seriously considered that sites like these must be listed as non-productive acreage in MFL plans. I realize that it would be hard to have a good definition of these sites, but perhaps a requirement that stands not harvested within 7 years of when the practice is due are automatically moved to non-productive and the plan</p>	<p>DNR has made progress in developing corrections for addressing the backlog of mandatory practices and cites the factors stated in this comment, among several others, for the build-up of incomplete mandatory practices including local markets and weather. Local market conditions have a significant impact on forest management and harvesting levels for any given region of the US.</p>

<p>adjusted like wise. This would clear up a lot of the backlog that otherwise might never get logged, and maybe never should. Overall, the MFL program is doing a great job of sustainably managing a lot of Wisconsin's private forest that would otherwise never be managed. It is definitely accomplishing its purpose of supplying wood for the timber industry. A lack of markets is hurting the logging force currently in Wisconsin, but that is another matter.</p>	
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## 4. Results of The Evaluation

Table 4.1 below, contains the evaluation team’s findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

### 4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C.

Principle / Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard
<b>P1: FSC Commitment and Legal Compliance</b>	None noted.	None noted.
<b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b>	There is clear legal tenure for the private lands that make up the MFL Group Certificate.	None noted.
<b>P3: Indigenous Peoples’ Rights</b>	None noted.	None noted.
<b>P4: Community Relations &amp; Workers’ Rights</b>	None noted.	None noted.
<b>P5: Benefits from the Forest</b>	MFL program contributes to local communities across the State. The approximate 46,000 MFL certified properties distributed across every county produce timber for the wood markets of Wisconsin and the region. Additionally, the portion of MFL properties that are open to public recreation help provide great opportunities for tourism,	None noted.

	recreation, and hunting/fishing related commerce.	
<b>P6: Environmental Impact</b>	<p>By encouraging long-term forest management, the MFL program helps keep lands maintained as working forests across Wisconsin and reduces the risk of conversion and development. This also provides a variety of forest cover types and age classes across the landscape.</p> <p>DNR programs to maintain water quality (BMPs), protecting RTE species (NHI and Species Guidance), maintaining stand level habitat (Silviculture Handbook- Chap 24) ensures environmental impacts are minimized. Notably, DNR has worked with the Natural Heritage Program to institute a new RTE interactive search feature online.</p>	See Minor CAR 2018.1, OBS 2018.2,
<b>P7: Management Plan</b>	None noted.	See OBS 2018.3.
<b>P8: Monitoring &amp; Assessment</b>	Note noted.	None noted.
<b>P9: High Conservation Value Forests</b>	None noted.	None noted.
<b>P10: Plantations</b>	NA	NA
<b>Chain of custody</b>	DNR maintains a simple yet effective system for tracking MFL claims and provides assistance	See Minor CAR 2018.4.
<b>Group Management</b>	None noted.	See OBS 2018.5, Minor CAR 2018.6,

## 4.2 Process of Determining Conformance

### 4.2.1 Structure of Standard and Degrees of Nonconformance

FSC-accredited forest stewardship standards consist of a three-level hierarchy: principle, the criteria that correspond to that principle, and the performance indicators that elaborate each criterion. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each nonconformance must be evaluated to determine whether it constitutes a major or minor nonconformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in nonconformance. The team therefore must use their collective judgment to assess each criterion and determine if the FME is in conformance. If the FME is determined to be in

nonconformance at the criterion level, then at least one of the applicable indicators must be in major nonconformance.

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

#### 4.2.2 Interpretations of Major CARs, Minor CARs and Observations

*Major CARs:* Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME’s response to the CAR within the stipulated time frame.

*Minor CARs:* These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

*Observations:* These are subject areas where the audit team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

#### 4.2.3 Existing Corrective Action Requests and Observations

<b>Finding Number: 2017.1</b>	
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input checked="" type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	US FM 6.5.d

<p><b>Non-Conformity</b> (or Background/ Justification in the case of Observations):</p> <p>BMPs for water bar installation were consistently applied across most audit sites in accordance with <i>Wisconsin's Forestry Best Management Practices for Water Quality</i> (page 53). However, other timber sale areas with on-going or completed harvest activities had slight to minor amounts of water run-off on skid and haul roads within harvest areas and instances of incomplete or insufficient water bars. These roads were nonetheless in conformance justifying this finding as an observation.</p> <p>Examples observed in the field: MFL Order Numbers: 57-095-2004, 57-060-2003, 12-034-2014, 12-016-1996, 12-013-2003, 57-018-2013, 11-015-2005, 57-018-2013. Detailed information for these sites are included in Section 2.1 of the 2017 audit report.</p>	
<p><b>Corrective Action Request</b> (or Observation):</p> <p>WIDNR should ensure that the transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes ensuring that erosion is minimized and sediment discharge to streams is minimized.</p>	
<p><b>FME response</b> (including any evidence submitted)</p>	<p>1. DNR made this one of their focus areas of internal MFL review in May of 2018. DNR found that in most cases BMP's for water quality are implemented and implemented correctly. DNR is investigating:</p> <ul style="list-style-type: none"> <li>• Additional targeted BMP training for WDNR Tax Law Forestry Specialists and particularly in the Driftless region of Wisconsin,</li> <li>• Training opportunities for the contractors who typically install logging road systems.</li> <li>• DNR is also looking at ways to cost effectively communicate with MFL owners to make them aware of the need to address water quality during and after timber harvest operations.</li> </ul> <p>2. The Division of Forestry has hired a communications specialist with a focus on private woodland owners and improving communication with MFL owners has been discussed as an area to be included in her future work plan.</p>
<p><b>SCS review</b></p>	<p>SCS reviewed the internal audit report and findings and confirmed DNR; review confirmed that the division has filled the Private Forestry Outreach Specialist position and confirmed by interview with Tax Section Chief that communications with MFL group member landowners will be a focus moving forward. However, given new findings related to water bar installations, this Observation will remain open to confirm implementation and effectiveness of these actions at the next audit. See Observation 2018.2.</p>
<p><b>Status of CAR:</b></p>	<p><input type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input checked="" type="checkbox"/> Other decision (refer to description above): Remains open as 2018.2</p>



<b>Finding Number: 2017.2</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	30-005 5.1.v
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Interviews with forestry field staff discovered that some Cutting Notice data are not being updated in WisFRS in accordance with procedures for maintaining group records. Although the majority of Cutting Notices are being entered, staff acknowledges a number of foresters have fallen behind. However, this was discovered by internal audits conducted in 2016 and the WIDNR has already formed corrective action plans and begun taking steps to make corrections. The IAR was reviewed with upper management - Met with Tax Section Team Leader, Public and Private Forestry Section Chief, Forest Management Bureau Director, Certificate Manager, Certificate Coordinator - reviewed results of internal audit results (management review), Monday April 4, 2016. Internal detection, investigation, and corrective action plans already underway justify this finding as an Observation.	
<b>Corrective Action Request</b> (or Observation): Records related to Cutting Notices that internal procedures require be entered into WisFRS database are to be kept up-to-date. WIDNR must ensure that documentation and records regarding recommended practices for forest management (i.e. silvicultural systems) are maintained and up-to-date.	
<b>FME response</b> (including any evidence submitted)	1. DNR made this one of the focus areas of our internal MFL review in May of 2018. Our findings in the NE Tax Law Team were that records are being appropriately kept up-to-date. 2. However we recognize that there is a backlog of work for some foresters because of a variety of circumstances including a series of vacancies in some offices. New work systems have been implemented and have been in place long enough to discern bottlenecks in work systems. Additional resources are being discussed (LTE foresters) to address backlogs of work, particularly records updates in WisFIRS.
<b>SCS review</b>	Cutting notices were examined throughout the 2018 audit and subsamples were compared to WisFRS records. Those examined were up to date. Interviews with Tax Specialist foresters confirmed new procedures were understood and prioritizations have been outlined. Bottlenecks have been identified and plans were presented for addressing keeping WisFIRS records up to date.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

#### 4.2.4 New Corrective Action Requests and Observations

<b>Finding Number: 2018.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC US FM 6.5.b
<b>Non-Conformity:</b> Auditors observed several sections of rutted roads and erosion with sediment deposition into a stream running through the harvest area (Order # 37-039-2010); no water bars had been installed. At another site, a main access haul road that was installed for a timber sale where the logging crew had pulled out of the sale in the fall. Crew was to return after oak wilt no-harvest period was done, departing for over 5 months. In the meantime, the road had washed out (erosion) on slopes greater than 45% and had no water bars installed for at least 300 feet. (Order # 27-018-2016). There were 75 sites inspected during this audit and all other sites were in conformance. Due to overall field conformance with this indicator it was determined this is a minor, isolated system breakdown rather than a fundamental failure justifying the grading of this finding as a Minor non-conformity.	
<b>Corrective Action Request (or Observation):</b> MFL forest operations must meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place. This includes those activities that take place outside of defined DNR engagement making this the responsibility of the landowner.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2018.2</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input checked="" type="checkbox"/> Other deadline (specify): <i>12 months or next regularly scheduled audit</i>
<b>FSC Indicator:</b>	6.5.d

<p><b>Non-Conformity</b> (or Background/ Justification in the case of Observations):</p> <p>Observation 2017.1: BMPs for water bar installation were consistently applied across most audit sites in accordance with <i>Wisconsin’s Forestry Best Management Practices for Water Quality</i> (page 53). However, other timber sale areas with on-going or completed harvest activities had slight to minor amounts of water run-off on skid and haul roads within harvest areas, instances of incomplete or insufficient water bars, inadequate gravel installed at road crossings of small intermittent streams, and minor soil compaction. These roads were nonetheless in conformance justifying this finding as an observation.</p> <p>Examples observed in the field: MFL Order Numbers: 57-095-2004, 57-060-2003, 12-034-2014, 12-016-1996, 12-013-2003, 57-018-2013, 11-015-2005, 57-018-2013, and 37-086-2012. Detailed information for these sites are included in Section 2.1 of this audit report.</p>	
<p><b>Corrective Action Request</b> (or Observation):</p> <p>2018: SCS reviewed the 2018 responses including the 2018 internal audit report and findings and confirmed findings as described above; confirmed that Private Forestry Outreach Specialist was hired, and confirmed by interview with Tax Section Chief that communications with MFL group member landowners will be a focus moving forward. However, given new findings related to water bar installations, this Observation will remain open to confirm implementation and effectiveness of these actions next year.</p> <p>2017: WIDNR should ensure that the transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes ensuring that erosion is minimized and sediment discharge to streams is minimized.</p>	
<p><b>FME response</b> (including any evidence submitted)</p>	<p>2017 Response:</p> <ol style="list-style-type: none"> <li>1. DNR made this one of their focus areas of internal MFL review in May of 2018. DNR found that in most cases BMP’s for water quality are implemented and implemented correctly. DNR is investigating: <ul style="list-style-type: none"> <li>• Additional targeted BMP training for WDNR Tax Law Forestry Specialists and particularly in the Driftless region of Wisconsin,</li> <li>• Training opportunities for the contractors who typically install logging road systems.</li> <li>• DNR is also looking at ways to cost effectively communicate with MFL owners to make them aware of the need to address water quality during and after timber harvest operations.</li> </ul> </li> <li>2. The Division of Forestry has hired a communications specialist with a focus on private woodland owners and improving communication with MFL owners has been discussed as an area to be included in her future work plans.</li> </ol>
<p><b>SCS review</b></p>	<p>2018:</p> <p>SCS reviewed the internal audit report findings and confirmed findings as described above; confirmed that new communications specialist has been hired, and confirmed by interview with Tax Section Chief that communications with MFL group member landowners will be a focus moving forward. However, given new findings related to water bar installations (Minor CAR 2018.1), this Observation will remain open to confirm implementation and effectiveness of these actions next year.</p>

<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> <i>Other decision (refer to description above)</i>
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<b>Finding Number: 2018.3</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC US FM 7.1.b

**Non-Conformity:**

On site/Order # 29-029-2008: Trees marked on the ground were inconsistent with the Cutting Notice (CN), which functions as the silvicultural prescription, and the CN did not match the Forest Management Plan (FMP). The CN describes the prescription for Stand 2 as, "Unevenaged management. Group selection and improvement thinning." The prescription in the land exam and practices report states, "Shelterwood Regeneration Harvest - Preparatory cut". There are supposed to be small and large gaps in the eastern side of the stand, as noted on the map submitted with the cutting notice, (totaling 6 patches) but there was only 1 piece of flagging found and the patches were not delineated adequately on the ground. The trees marked for removal in the sale, did not match the description in the cutting notice. Finally, the description of the stand contained in the FMP was not wholly accurate. This sale was marked, but not yet up for sale. Additionally, if the stream running through the site is to be crossed, a permitted stream crossing must be applied for; also the original cutting notice from 2012 was ejected, as it was considered to be high-grading of the stand. The resubmitted cutting notice was revised and previously marked trees orange cut marks were blacked out for a few trees viewed.

On site/Order # 50-008-2009: the proposed cutting practices were noted as "Cut all aspen, ironwood, and trees marked with orange paint." Site inspection by the auditors revealed numerous large aspen and ironwood that were uncut. There were also several trees marked with orange paint that were not cut. Relatively few stumps were found in spite of thoroughly searching the FMU, and it was questionable as to whether the volume reportedly harvested, particularly the volume of aspen, matched the number and size of stumps observed qualitatively.

These were the only sites identified during the audit with this incongruity where implementation did not match either FMP or CN. However, there are enough new steps and procedures in the MFL program resulting in changes of roles and responsibilities related to the new Act 358, and codes currently being crafted, that further review is warranted. The land exam is not recognized as a formal document in the MFL so it was not clear to all auditors how the FMP is being updated. The MFL program would be strengthened by reviewing how Cutting Reports are used to ensure the FMP, CN, and implementation are linked and accurate.

There were 75 sites inspected during the 2018 audit and this was the only site discovered with this disparity between FMP, CN and field set up or harvesting. This finding was determined to be a minor, isolated breakdown rather than a fundamental system failure which justifies grading as a Minor rather than a Major non-conformity.

**Corrective Action Request (or Observation):**

Actions undertaken on the FMU should be consistent with the management plan and be consistent towards achieving the stated goals and prescribed objectives of the plan.

**FME response**  
(including any evidence submitted)

**SCS review**

**Status of CAR:**

- Closed
- Upgraded to Major
- Other decision (refer to description above)

<b>Finding Number: 2018.4</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-STD-30-005, 1.4
<b>Non-Conformity:</b> Multiple Tax Specialist foresters were unable to demonstrate knowledge of Wisconsin State BMPs when interviewed by auditors specifically related to practices and requirements for water bar installations. Furthermore, foresters interviewed did not have access to, or a copy of, Wisconsin BMPs for Water Quality in the field (none had copies in trucks or on phones except the Group Manager). When requested, foresters were not able to provide copies of BMP manuals to auditors in the field such that it was unclear how foresters would check timber sales set up for inspecting Cutting Notices or for inspecting Cutting Reports to make determinations of conformance in the field by visual inspections.	
<b>Corrective Action Request (or Observation):</b> The Group entity must define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards. Programs must include effectiveness of training such as when working with landowners who must ensure harvest activities meet BMP requirements or when inspecting sites for BMP conformance. Effectiveness may be proven by demonstration of knowledge verbally or in the field or by otherwise producing relevant information in the field where BMP determinations are made.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2018.5</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input checked="" type="checkbox"/> Other deadline (specify): <i>within 12 months or next regularly scheduled audit</i>
<b>FSC Indicator:</b>	FSC-STD-30-005, 2.2

<p><b>Non-Conformity</b> (or Background/ Justification in the case of Observations):</p> <p>In interviews with multiple DNR staff auditors were informed that the DNR MFL website is the primary resource for landowners regarding requirements of the program. However, the “MFL Handbook”, which is chapter 21 of the Forest Tax Law Handbook, available on the MFL website is from the 2008 version of the Handbook when the most recent version is 2017, therefore the MFL Handbook available to landowners is out of date.</p> <p>Evidence:</p> <p><a href="https://dnr.wi.gov/topic/TimberSales/mfl.html">MFL Certified Group Chapter of the Forest Tax Law Handbook [PDF]</a>, &lt;<a href="https://dnr.wi.gov/topic/TimberSales/mfl.html">https://dnr.wi.gov/topic/TimberSales/mfl.html</a>&gt;</p>	
<p><b>Corrective Action Request</b> (or Observation):</p> <p>The Group entity management representative, Group Manager, has an overall responsibility and authority for the Group entity’s compliance with all applicable requirements of this standard which includes providing up to date roles, responsibilities, and conformity requirements that must be met by landowners.</p>	
<p><b>FME response</b> (including any evidence submitted)</p>	
<p><b>SCS review</b></p>	
<p><b>Status of CAR:</b></p>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2018.6</b>	
<p>Select one: <input type="checkbox"/> Major CAR    <input checked="" type="checkbox"/> Minor CAR    <input type="checkbox"/> Observation</p>	
<p><b>FMU CAR/OBS issued to</b> (when more than one FMU):</p>	
<p><b>Deadline</b></p>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<p><b>FSC Indicator:</b></p>	<p>FSC-STD-30-005, 3.2</p>

<p><b>Non-Conformity</b> (or Background/ Justification in the case of Observations):</p> <p>Order # 20-014-2012: Landowner did not report herbicide use. A landowner/group member during interview relayed using herbicides as allowed under the FSC US FM Standard but did not report such use because they were not aware of this responsibility of the landowner.</p> <p>During interviews group members self-described as not aware of their responsibilities for complying with some applicable FSC standard requirements. This description of landowners as being “likely unaware of responsibilities” was also described in interviews with Certified Plan Writers (CPWs), Cooperating foresters, and DNR Tax Specialist foresters. Topics for which landowners were likely to lack knowledge of their responsibilities included the following:</p> <ul style="list-style-type: none"> <li>• Herbicide reporting</li> <li>• Site close-outs including BMPs, post-harvest exams</li> <li>• Regeneration monitoring</li> <li>• Special sites protections (Archeology and RTE, as needed)</li> </ul>	
<p><b>Corrective Action Request</b> (or Observation):</p> <p>The Group entity’s procedures must be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements including ensuring members are aware of responsibilities for which they are obligated to meet.</p> <p>Note regarding herbicide reporting: Related indicator 6.6.e for FMEs requires monitoring herbicide use and the group entity has responsibilities to report summaries of such use in FSC reports. FSC accreditation standards require formal presentation of herbicide use summaries. The Group Manager has been identified as the party responsible for reporting such summaries to be included as required by FSC standards (specifically FSC-STD-20-007a). Importantly, such use cannot be monitored (per 6.6.e) nor summarized without basic reporting made by landowners.</p>	
<p><b>FME response</b> (including any evidence submitted)</p>	
<p><b>SCS review</b></p>	
<p><b>Status of CAR:</b></p>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

#### 4.2.5 Major Nonconformances

<input checked="" type="checkbox"/>	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.



## 5. Certification Decision

Certification Recommendation	
FME be awarded FSC certification as a “Well-Managed Forest” subject to the minor corrective action requests stated in Section 4.2.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols. If certification is recommended, the FME has satisfactorily demonstrated the following without exception:	
FME has addressed any Major CAR(s) assigned during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
FME has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this report) are met over the forest area covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>Comments:</b>	

## SECTION B – APPENDICES (CONFIDENTIAL)

### Appendix 1 – Current and Projected Annual Harvest for Main Commercial Species

Each of the group member/land owners have their own harvest intervals based on inventory data.

### Appendix 2 – List of FMUs Selected for Evaluation

- FME consists of a single FMU  
 FME consists of multiple FMUs or is a Group

SCS staff establishes the design and level of sampling prior to each group or multiple FMU evaluation according to FSC-STD-20-007. A list of the FMUs sampled and the rationale behind their selection is listed below.

This is a mega-group requiring a minimum of 55 sites, all properties are SLIMF. The audit targeted 75 sites to sample of which 25% were randomly selected. The remainder were selected to provide a sufficient variety of conditions geographically located to provide auditing efficiency. Conditions targeted included sites: marked for thinning, recently thinned, marked for harvesting, recently harvested, one year after harvesting, five years after harvesting, ten years after harvesting, areas used by communities and/or indigenous peoples within or near the forest area, water courses of different sizes, within and downstream of the forest area, roads and forest roads of different sizes affected by the Forest Management, new construction, sites where chemicals have been applied and stored, potential special biodiversity sites, and/or monitoring or research sites.

A detailed listing of sites selected, acreages and other information are provided in the spreadsheet copied below.



### Appendix 3 – Additional Evaluation Techniques Employed

- None.  
 Additional techniques employed (*describe*):

### Appendix 4 - List of Stakeholders Consulted

#### List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
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Amanda Koch	Tax Law Policy Specialist	608-267-2302 <a href="mailto:Amanda.koch@wisconsin.gov">Amanda.koch@wisconsin.gov</a>	In person
Bill Millis	Tax Law Forestry Specialist, Lincoln County	715-536-2152	In person
Chase O'Brien	Forestry Specialist	Unknown	In person
Chris Schmitz	Tax Law Forestry Specialist	(715) 937-0160 mobile	In person
Chuck Abitz	Tax Law Forestry Specialist	(715) 307-0096 mobile	In person
Cody Caulum	Tax Law Forestry Specialist	(608) 344-1038 mobile	In person
Dylan Bell,	Forester		In person
Drew Lzyscon			In person
Fred Souba	Division Administrator	(608) 720-8106 mobile	In person
Heather Berklund	Deputy Division Administrator	608-598-9068	In person
Jake Elder	South Tax Law Team Leader	(608) 604-5848 mobile	In person
Jeff Simon	Tax Law Operations Specialist	608-267-2109 <a href="mailto:JeffreyS.simon@wisconsin.gov">JeffreyS.simon@wisconsin.gov</a>	In person
Jeffery Nyquist	Forester	715-340-1803	In person
Jerry Crow	North Central Tax Law Team Leader	715-453-2188	In person
Jim Warren	Private and Public Lands Section Chief	(608) 575-3863 mobile	In person
Katharine Haan	Tax Law Compliance Specialist	(608) 640-9457 mobile	In person
Mark Heyde	Forest Certification Coordinator	(608) 220-9780 mobile	In person
Matt Bauer	Tax Law Forestry Specialist	(608) 606-1020 mobile	In person
R.J. Wickham	Tax Law Section Chief	(920) 369-6248 mobile	In person
Ryan Conner	Tax Law Administrative Coordinator	608-266-8449 <a href="mailto:Ryan.conner@wisconsin.gov">Ryan.conner@wisconsin.gov</a>	In person
Scott Mueller	Tax Law Forestry Specialist	(715) 560-0340 mobile	In person
Steve Edge	Northwest Tax Law Team Leader	(715) 579-8895 mobile	In person
Sue Crowley	Northeast Tax Law Team Leader	(608) 220-3253 mobile	In person
Trent Marty	Director, Bureau of Forestry Field Operations	608-575-8578	In person

**List of other Stakeholders Consulted**

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Robert "Bob" Bloczynsk	Bloczynski Logging	715-896-1188	Interview	N
Russell Edmison	Bloczynski Logging	608-633-1027	Interview	N
Sara Peterville	Verso, District Supervisor, NW WI	715-790-8795	Interview	N
Geoff Morrisx	Verso, Procurement Forester, NW WI	715-790-8795	Interview	N
Phil and Lynn Hellmuth	Landowners/group members	608-255-8177	Interview	Y
Ben Williams	Project Forester, Steigerwaldt	715-453-3274	Interview	N
Mary Lou Trochlell	Landowner/group member	844 E Rockland Rd., Libertyville, IL 60048	Interview	N

Joe and Mary Hovel	Landowner/group member	<a href="mailto:hovelbear@gmail.com">hovelbear@gmail.com</a>	Interview	N
John Holger	Procurement Forester, Northwest Hardwoods	715-654-5171	Interview	N
Dale Rine	Consulting Forester			
Al Lamovek	Manager, Wisconsin Adventures on Wheels	<a href="mailto:alatWAW@gmail.com">alatWAW@gmail.com</a>	Interview	Y
Leon Kroening	Landowner/group member	262-363-9638	Interview	Y
Brad Schewe	Landowner/group member	715-453-5588	Interview	Y
Anonymous*	Records maintained by SCS	-	-	Yes
Anonymous*	Records maintained by SCS	-	-	No
Matt Dallman	The Nature Conservancy	<a href="mailto:mdallman@TNC.ORG">mdallman@TNC.ORG</a>	Phone	Yes
Ken Price	Valley View Forestry	<a href="mailto:ksprice27@yahoo.com">ksprice27@yahoo.com</a>	Email	Yes
Dan Pubanz	Wolf River Forestry	<a href="mailto:pubanz@frontiernet.net">pubanz@frontiernet.net</a>	Email	Yes
Dan Peterson	Verso Corporation	dan.l.peterson@versoco.com	In person	Yes
Fred Hengst	Central Forestry Consulting	foresterfred@centralforestry.com	In person	Yes
Thomas Ahles	Landowner	715.693.2831 tjahles@charter.net	In person	Yes
Dorothy Hagode and daughter	Landowner	#29-022-1996	In-person	N
Fred Hengst	Central Forestry Consulting	715.498.5962	In-person	Y
Jim & Jerry Steele	Landowner	#42-028-2012	In-person	N
Delbert Leis	Landowner	42-021-2010	In-person	N
Name	Landowner	#44-036-2013	In-person	Y
Dan Oestreich	Landowner	#35-017-2012	In-person	N
Joe [Last name] and son	Landowner	#35-001-1993	In-person	N
Bill Bellievue	Consulting forester	Contact via Trochlell, 844 E Rockland Rd., Libertyville, IL 60048	In-person	N

\*SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its record-keeping system. Stakeholders included in this Appendix have given their permission to include their name, contact details, and comments in the report. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities.

## Appendix 5 – Pesticide Derogations

<input checked="" type="checkbox"/> There are no active pesticide derogations for this FME.		
<b>Name of pesticide / herbicide (active ingredient)</b>		<b>Date derogation approved</b>
<b>Condition</b>	<b>Conformance (C / NC)</b>	<b>Evidence of progress</b>

## Appendix 6 – Detailed Observations

*C= Conformance with Criterion or Indicator*

*C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances*

*NC= Nonconformance with Criterion or Indicator*

*NA= Not Applicable*

REQUIREMENT	C/NC	COMMENT/CAR
<b>Principle #1: Compliance with Laws and FSC Principles</b> Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
<b>C1.1 Forest management shall respect all national and local laws and administrative requirements.</b>	C	
1.1.a <i>Forest</i> management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and <i>administrative requirements</i> (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <i>Certifying Body</i> (CB) during the annual audit.	C	<p>Verified conformance at all MFL Properties inspected during the 2018 audit.</p> <p>Beginning July 1, 2017, WDNR implemented a new Tax Law Section model developed during a prior DNR Alignment process. The revised Tax Law Section uses 4 geographic teams to administer MFL and provide customer service across the state. The new section includes Tax Law Field Specialists and Tax Law Administration Specialists and Team Leaders that focus exclusively on the MFL &amp; FCL tax law programs, provide increased knowledge and program proficiency through specialization. The new section also includes Program Specialists and a Section Chief that will provide the foundational program and policy guidance.</p> <p>Evidence reviewed:</p> <ul style="list-style-type: none"> <li>• WI DNR Cutting Notice and Report for each MFL property inspected</li> <li>• MFL Stewardship Plan for each property inspected</li> <li>• Timber sale contracts.</li> <li>• WI DNR Forest Tax Law Handbook, <a href="http://dnr.wi.gov/topic/ForestManagement/documents/24505.pdf">http://dnr.wi.gov/topic/ForestManagement/documents/24505.pdf</a></li> <li>• WI DNR Silviculture Handbook, <a href="http://dnr.wi.gov/topic/ForestManagement/silviculture.html">http://dnr.wi.gov/topic/ForestManagement/silviculture.html</a></li> </ul>

		<ul style="list-style-type: none"> <li>• WI DNR Forest Management Guidelines</li> <li>• WI DNR Private Forestry Handbook (24705), <a href="http://dnr.wi.gov/topic/ForestManagement/documents/24705.pdf">http://dnr.wi.gov/topic/ForestManagement/documents/24705.pdf</a></li> <li>• Public Forest Lands Handbook, 2460.5, <a href="http://dnr.wi.gov/topic/ForestManagement/documents/24605.pdf">http://dnr.wi.gov/topic/ForestManagement/documents/24605.pdf</a></li> </ul>
1.1.b To facilitate legal compliance, the <i>forest owner or manager</i> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	C	<p>DNR addresses this requirement through training opportunities and adherence to procedures described in handbooks. Training includes:</p> <ul style="list-style-type: none"> <li>• Cooperating Foresters are required to complete 16 hours of training per year.</li> <li>• Certified Plan Writers (CPWs) must meet qualifications and also undergo training updates each year. A copy of the 2018 training is for CPWs is available online, <a href="https://dnr.wi.gov/topic/forestLandowners/documents/2018MFLRecertProgramUpdates.pdf">https://dnr.wi.gov/topic/forestLandowners/documents/2018MFLRecertProgramUpdates.pdf</a>. Presented at in-person session of which 7 were offered at different locations.</li> <li>• Through FISTA, DNR provides training sessions for loggers. Certified Plan Writers, DNR Foresters, supervisors and other DNR staff who administer the MFL program must attend the annual MFL Recertification training. For example see, <a href="https://dnr.wi.gov/topic/ForestLandowners/taxCPW.html">https://dnr.wi.gov/topic/ForestLandowners/taxCPW.html</a> (last accessed 12 May 2018). Mills, state, and counties all require training through FISTA.</li> </ul>
<b>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b>	C	
1.2.a. The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.	NA	All group members qualify as SLIMFs.
FF 1.2.a: Low risk of negative social or environmental impact.	C	DNR confirms by examining landowner production reports. Production reports are legislatively required. Register deeds notifies DNR of delinquent taxes, MFL advises landowner of anydelinquency.
<b>C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b>	C	
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.	NA	All group members qualify as a SLIMF.
FF Indicator 1.3.a: Low risk of negative social or environmental impact	C	No evidence indicating non-compliance was discovered during the audit. This has been determined to be a low risk of negative social or environmental impact due to U.S. Federal Law requirements covering most of Criterion 1.3.
<b>C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.</b>	C	

1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	C	No conflict between laws, regulations, and the FSC P&C were identified. Responsible DNR staff confirmed in interview knowledge of requirement to notify CB should such a conflict arise.
<b>C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b>	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).	C	Landowners reported active management and monitoring for unauthorized activities including timber theft, trash dumping, unlawful trespass, recreation damage and so on. When issues related to property boundaries are identified the Specialist will refer landowners to other resource professional (Certified Surveyor, Cooperating Forester) as needed/appropriate.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	<p>Illegal or unauthorized activities were not observed during 2018 audit. Confirmed adequate boundary marking at all properties reviewed. Interviews with landowners indicated that illegal/unauthorized activities were not an issue of significant concern and were pursued with local law enforcement if there was concern. Landowners are provided training opportunities through Wisconsin Woodland Owners association (WWOA) regarding safety and healthy concerns. Examples include identification and procedures for identifying illegal drugs. Offer trainings in first aid and safety. CDC education on Lyme's disease.</p> <p>Mandatory practices training is a primer and encourages engagement of landowners with forestry specialists and professional foresters.</p>
<b>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b>	C	
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	C	Forest Tax Law Handbook documents commitment to the FSC Principles and Criteria (Chapter 21-1).
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	C	Partial certification is covered in the Forest Tax Law Handbook (Chapter 21)
1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	NA	All group members qualify as a SLIMF.
FF Indicator 1.6.c The forest owner, manager or group manager notifies the Certifying Body of significant changes in ownership, the certified land base and/or significant changes in management planning prior to the next	C	WI DNR staff have consistently communicated plans for significant changes or notified SCS in a timely manner for those changes.

<p>scheduled annual audit, or within one year of such change, whichever comes first.</p>		
<p><b>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b></p>		
<p><b>C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</b></p>	<p>C</p>	
<p>2.1.a The forest owner or manager provides clear evidence of <i>long-term</i> rights to use and manage the FMU for the purposes described in the management plan.</p>	<p>C</p>	<p>Long-term use rights confirmed by: Forest Tax Law handbook, 2450.5, which outlines eligibility and approval steps for acceptance into the program, including long-term rights. Evidence of deed maintained in each property file. Clear legal ownership is a precondition of MFL enrollment (Forest Tax Law handbook, 21-2).</p>
<p>2.1.b The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.</p>	<p>C</p>	<p>Ownership documents (e.g., deeds, titles) are in each case file (MFL order #, Forest Tax Law handbook, 21-1).</p> <p>Other legally established use rights, such as power-line rights-of-way (ROW), were observed on MFL group member properties. In all cases observed, the power-line ROWs were at property boundaries and thus not considered to be a use right that would require special access via a group member’s property.</p> <p>Other property rights observed include the Ice Age Trail, which traverses at least one MFL group member property in the Southeastern district. Documents regarding the legal designation of the trail are not maintained by DNR, but rather by the landowner.</p> <p>Confirmed that properties classified as Open to public recreation are documented as such. MFL law (Forest Tax Law Handbook chapter 20-36) requires open status on parcels above 160 acres per municipality (80 acres in entries dated 2004 and earlier). WI DNR has an on-line mapping resource to provide the public with better information about access to Open properties.</p>
<p>2.1.c Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.</p>	<p>C</p>	<p>Observed systematic boundary marking of MFL properties across all properties inspected. In many cases, corners are monumented with poles or other man-made features such as fence posts. Each group member file contains a map that indicates use rights and property boundaries. It is the group member responsibility to identify/ maintain property boundaries prior to timber harvests or other management activities.</p>
<p><b>C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</b></p> <p><b>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as</b></p>	<p>C</p>	



<b>all residents and property owners of the relevant jurisdiction.</b>		
2.2.a The forest owner or manager allows the exercise of <i>tenure and use rights</i> allowable by law or regulation.	C	Confirmed that properties classified as Open to public recreation are documented as such via a demonstration of WisFRS for the MFL program, as well as an online mapping tool ( <a href="http://dnrmaps.wi.gov/opfl">http://dnrmaps.wi.gov/opfl</a> ).
2.2.b In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.	C	Most timber harvesting activities are compatible with hunting rights on properties Open to public hunting is non-motorized-only because most harvests occur outside of hunting season and often promote conditions optimal for game species such as deer and turkey.
<b>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</b>	C	
2.3.a If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes. FF Indicator: Low risk of negative social or environmental impact.	C	The group manager does not become involved in disputes over tenure or use rights unless there is an enforcement issue over boundaries such as unreported land sales or false reporting of acreage. The group manager reviews tax records on an annual basis to verify any changes in ownership.  Refer to site notes in section 2.1 of Section A. Several examples of group members and consulting foresters employing measures to avoid or reduce potential conflicts over property boundaries were observed during the audit. On Order #29-007-1996 a conflict arose with a landowner’s family member who was unaware of the Open status of this MFL property. Ultimately, MFL staff was reached who contacted the landowners to educate regarding status as Open. Following this the landowner then elected to voluntarily change the property status to Closed with associated change in tax status.
2.3.b The forest owner or manager documents any significant disputes over tenure and use rights. FF Indicator: Low risk of negative social or environmental impact.	C	No group members or consulting foresters reported any disputes over tenure and use rights during interviews.
<b>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</b>		
<b>C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</b>	NA	MFL is a voluntary tax incentive program for non-industrial private lands. While some small tribal-owned parcels have been enrolled in the MFL Program, tribal landowners have done so entirely at their discretion and in accordance with tribal laws and customs. Noted that WI DNR staff that includes a Department Tribal Liaison as a resource of MFL program staff.
3.1.a. Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.	NA	
3.1.b. The manager of a tribal forest secures, in writing, informed consent regarding forest management activities	NA	

from the tribe or individual forest owner prior to commencement of those activities.		
<b>C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b>	C	
3.2.a. During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	Tribes have hunting and fishing rights on MFL lands that are open for public access, as does the general public, and some extended hunting and fishing rights within the ceded territories in Wisconsin. Through interviews with DNR staff, it was confirmed that most tribal concerns on MFL lands relate to the protection of archaeological sites and access to hunting and fishing rights.
3.2.b. Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	<p>Audit confirmed that appropriate steps are taken to protect resources of sensitive sites once they have been identified.</p> <p>WI DNR uses a variety of mechanisms to consult with the six federally-recognized Chippewa tribes regarding forest management and off-reservation hunting rights. These mechanisms include designating individual tribal liaisons to consult with each Chippewa tribe on forestry-related topics including the MFL program, specific inclusion and communications with Great Lakes Indian Fish and Wildlife Commission on important forestry management protocols (e.g., biomass harvest guidelines, BMPs for water quality, Invasive Species BMPs, Silviculture Handbook, and Forest Management Guidelines).</p> <p>Cutting Notices for the order numbers reviewed in this evaluation included a survey of Wisconsin Historic Preservation Database that includes tribal resources. Many DNR staff and some cooperating foresters have training on archeological site identification.</p>
<b>C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</b>	C	
3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.	C	See FF Indicator 3.3.a.
FF Indicator 3.3.a: The forest owner or manager maintains a list of sites of current or traditional cultural, archeological, ecological, economic or religious significance that have been identified by state conservation agencies and tribal governments on the FMU or that could be impacted by management activities.	C	Field visits confirmed that appropriate steps are taken to identify and protect resources of sensitive sites once they have been identified. The DNR consults archaeological databases for each cutting notice issued to check for the presence of archaeological and historic sites. MFL staff at field sites interviewed were aware of archaeological procedures, as were certified plan writers.
3.3.b. In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).	C	WI DNR's tribal liaisons and other staff consult with tribes to develop strategies to protect from damage or interference those areas of cultural or historical interest. Upon identification of sites of special significance, state archeologists engage tribal representatives to ensure adequate protection measures.

<p><b>C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</b></p>	<p>NA</p>	<p>WI DNR is not aware of any use of protected traditional knowledge being used in their forest management. This criteria and associated indicators is not applicable.</p>
<p>3.4.a. The forest owner or manager identifies whether <b>traditional knowledge</b> in forest management is being used.</p>	<p>NA</p>	
<p>3.4.b When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.</p>	<p>NA</p>	
<p>3.4.c. The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.</p>	<p>NA</p>	
<p><b>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b></p>		
<p><b>C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b></p>	<p>C</p>	
<p>4.1.a Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Most service providers interviewed (loggers and certified plan writers (CPW)/ consulting foresters) are self-employed. A few are direct employees of a service provider and stated that compensation is similar to what could be earned in similar forestry jobs locally and exceed minimum wage requirements. One CPW firm employee in 2018 reported that the forestry consulting company worked with at least one local mill for procuring certified fiber specifically through the MFL certified program.</p>
<p>4.1.b Forest work is offered in ways that create high quality job opportunities for employees. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Certain service providers, such as CPWs, can take training courses targeted to the MFL program, and learn about DNR processes and classifications. Division overall is being more flexible, using smart phones and laptops for mobile working. Office locations are being more flexible.</p>
<p>4.1.c Forest workers are provided with fair wages. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>See 4.1.a.</p>
<p>4.1.d Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Low risk of negative impact is confirmed; all hiring and conditions of employment must adhere to federal and state regulations based on this indicator. Women forestry professionals from private and DNR sectors were interviewed during the assessment. DNR employees interviewed stated that training on sexual harassment and discrimination is required as a condition of being hired and often is a topic of monthly meetings.</p>
<p>4.1.e The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.</p>	<p>NA</p>	<p>FME consists entirely of SLIMF FMUs.</p>
<p>FF Indicator 4.1.e: The forest owner or manager, as feasible, contributes to the local community.</p>	<p>C</p>	<p>MFL program is contributes to local communities across Wisconsin. No input was received from forest products industries</p>

		regarding value or benefit of MFL certified logs or fiber. However, economic studies indicate that Forestry is one of the top ten industries by employment and output in Wisconsin. Forestry provides 1.8% of the jobs and 4% of the output in the state. The MFL certified properties are distributed across nearly every county and produce timber for the wood markets of Wisconsin and neighboring states. Additionally, the portions of MFL properties that are open to public recreation help provide opportunities for tourism, recreation, and hunting/fishing related commerce. Interviews with staff and landowners discovered high interest and use of open access lands, particularly during white tailed-deer bow and rifle hunting seasons.
4.1.f Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management. FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)	NA	Inapplicable (pertinent requirements incorporated into Indicator 4.1.e).
4.1.g The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available. FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)	NA	Inapplicable (pertinent requirements incorporated into Indicator 4.1.e).
<b>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b>	C	
4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1). FF Indicator: Low risk of negative social or environmental impact.	C	This indicator continues to be low risk of negative impact. DNR provides information on applicable laws and regulations on health and safety in the Timber Sale Handbook and Private Forestry Handbook. DNR staff is required to wear safety glasses, helmet and hi-vis vest provided at DNR expenses to be used as required by procedures. DNR became an enterprise agency for fleet management enabling access to reliable vehicle transport in sometimes remote and rugged terrain.
4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	C	DNR provides information on applicable laws and regulations on health and safety in the Timber Sale Handbook and Private Forestry Handbook, including basic contractual requirements. Contracts were reviewed and confirmed as containing relevant safety language.
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan. FF Indicator: Low risk of negative social or environmental impact.	C	According to DNR staff and certified plan writers interviewed, most landowners contract with local loggers and other service providers that have reputations for good work. No safety issues were reported and no significant residual stand damage was observed on harvest or prescribed burn sites visited during the audit, which indicates that there is still low risk of negative impacts for this indicator. Notably, a high percentage of harvesters or foremen used on MFL sites were trained through FISTA.
<b>C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as</b>	C	

<p><b>outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</b></p>		
<p>4.3.a Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests. FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>Federal and State laws ensure that workers have the right to freedom of association. As confirmed through interviews, there is low risk of negative social or environmental impact since most workers are contractors or employees of contractors from Small-to-Medium-sized Enterprises (SMEs). Many DNR employees are unionized.</p>
<p>4.3.b The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management. FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>DNR has internal policies for dispute resolution between workers. U.S. labor laws provide adequate protection to confirm low risk for non-DNR workers.</p>
<p><b>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</b></p>	C	
<p>4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: Archeological sites and sites of cultural, historical and community significance (on and off the FMU); Public resources, including air, water and food (hunting, fishing, collecting); Aesthetics; Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; Community economic opportunities; Other people who may be affected by management operations. A summary is available to the CB.</p>	NA	<p>MFL consists entirely of SLIMF FMUs.</p>
<p>FF Indicator 4.4.a The forest owner of manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations.</p>	C	<p>Social impact assessments are covered by the following WI DNR procedures and guidance documents that are included as components of the MFL management system:</p> <ul style="list-style-type: none"> <li>Department of Natural Resources Division of Forestry Strategic Direction, 2017–2022, <a href="https://dnr.wi.gov/topic/forestPlanning/documents/strategicDirection2017.pdf">https://dnr.wi.gov/topic/forestPlanning/documents/strategicDirection2017.pdf</a>.</li> </ul> <p>Historically significant sites and archeological sites are identified using the Archeological and Historical Database Public Resources (primarily water) are identified and protected through BMPs for Water Quality. Aesthetics are covered under chapter 4 of Forest Management Guidelines.</p>
<p>4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	C	<p>Interviews with cooperating foresters, CPWs, and group members confirmed that most maintain regular communication with neighbors over any timber harvests close to boundaries and that</p>

<p>FF Indicator: Low risk of negative social or environmental impact.</p>		<p>some of them even send letter to neighbors prior to harvesting. Low risk re-confirmed in 2018.</p>
<p>4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	<p>C</p>	<p>See 4.4.b. Before a timber harvest can occur, there is a 30-day period for DNR to review the harvest plan, when legislatively required, that is described in a Cutting Notice. Such a review includes elements listed in 4.4.a to ensure that adverse effects do not occur.</p>
<p>4.4.d For <i>public forests</i>, consultation shall include the following components:                  Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans;                  Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management;                  An accessible and affordable appeals process to planning decisions is available.                  Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>	<p>NA</p>	<p>MFL does not include any publicly owned or managed FMUs; all ownership and management is considered private.</p>
<p><b>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</b></p>	<p>C</p>	
<p>4.5.a The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	<p>C</p>	<p>Group members, MFL staff, and service providers interviewed did not report any cases of negligent activity on the part of program participants.</p>
<p>4.5.b The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>	<p>C</p>	<p>Process for voicing and resolving grievances are detailed in the Forest Tax Law handbook. For MFL group members, informal negotiations with affected parties are possible in addition to formal legal processes over cases of substantiated damages. MFL staff interviewed are aware of communication channels in case a staff member is accused of negligence, such as involving superiors and legal staff. In most cases, MFL staff try to avoid conflicts by adhering to MFL procedures and policies.</p>
<p>4.5.c Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.                  FF Indicator: Low risk of negative social or environmental impact</p>	<p>C</p>	<p>As confirmed through interviews with group members and other stakeholders, there is low risk of nonconformance to this indicator due to informal and formal mechanisms available for resolving cases of damages to third-parties because of forest management activities.</p>
<p>Principle #5: Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p>		

<p><b>C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</b></p>	<p>C</p>	
<p>5.1.a. The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.</p>	<p>C</p>	<p>Requirement met primarily through core strategy of MFL that encourages long-term management (i.e., 25-50 year contracts) by offering considerably reduced property tax rates.</p> <p>Confirmed a reasonable amount of continued investment such as cost sharing for tree planting and invasive plant control through Wisconsin Forest landowner Grant Program (<a href="http://dnr.wi.gov/topic/forestlandowners/financial.html">http://dnr.wi.gov/topic/forestlandowners/financial.html</a>) on properties inspected in 2018.</p> <p>In addition DNR and MFL program foresters and other plan writers are able to provide assistance with the following federal cost sharing programs (<a href="http://dnr.wi.gov/topic/forestlandowners/financial.html">http://dnr.wi.gov/topic/forestlandowners/financial.html</a>) : Conservation Reserve Program (CRP); Environmental Quality Incentives Program (EQIP); Conservation Stewardship Program (CSP); CSP for Forestland Managers; and CSP for Wildlife.</p>
<p>5.1.b. Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.</p>	<p>C</p>	<p>Confirmed harvest sites visited used sound silviculture that was not based on short-term financial factors. In selection harvests, high quality trees capable of future growth were observed to be systematically retained for future harvests.</p> <p>The division has completed a long-term realignment process and anticipates hiring to fill many of these positions within the next year.</p>
<p><b>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</b></p>	<p>C</p>	
<p>5.2.a Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service. FF Indicator: Low risk of negative social or environmental impact</p>	<p>C</p>	<p>Most contractors interviewed or listed on cutting notices were from nearby communities or from neighboring states close enough to group members to be considered local. In order of importance, most timber harvested in sold in Wisconsin, Minnesota or Iowa.</p>
<p>5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.</p>	<p>C</p>	<p>Several group members use un-merchantable wood for personal use such as for carpentry or firewood, as confirmed through observation of firewood piles and interviews with group members. Many MFL landowners worked with professional foresters who, with harvesters, worked to sort and merchandise logs for optimal marketing and income.</p>
<p>5.2.c On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.</p>	<p>NA</p>	<p>MFL does not include public forests.</p>

<p><b>C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</b></p>	<p>C</p>	
<p>5.3.a Management practices are employed to minimize the loss and/or waste of harvested forest products.</p>	<p>C</p>	<p>As observed on field sites, stumps were low to the ground and tops left in the field. Through interviews with MFL staff and group members, auditors learned that mills communicate desired log dimensions prior to harvest, which was confirmed in the field via evidence of tops and smaller diameter material that did not meet specifications.</p>
<p>5.3.b Harvest practices are managed to protect residual trees and other forest resources, including: soil compaction, <i>rutting</i> and erosion are minimized; residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; damage to NTFPs is minimized during management activities; and techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.</p>	<p>C</p>	<p>As observed on field sites, directional and/or mechanical felling techniques are used to avoid damage to the residual stand and to soil and water. Winter or late summer harvesting is usually conducted to reduce impacts to vegetation, sensitive sites, soils, and water. No rutting or soil damage from harvesting that exceeded state BMPs was observed in forest stands. Most harvesting does not occur near NTFPs such as maples designated for sugaring and mushrooms are often unaffected.</p>
<p>5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	<p>C</p>	
<p>5.4.a The forest owner or manager demonstrates knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.</p>	<p>C</p>	<p>In general, the MFL program has been used during economic downturns or weather/climate related restrictions to keep logging crews busy on appropriate sites as certain management practices are mandatory, as confirmed through interviews with MFL staff and landowners.</p> <p>A fact sheet was prepared and provided by DNR economist based on 2016 data and soon to be published to the state website. Fact sheets summarizes the impacts of DNR, County Forests, and MFL lands on the state economy (<i>Wisconsin Forestry Facts: Economic Impact, 2017</i>). This fact sheet summarizes the direct effects of the forest products industry on the state’s economy, as well as a summary of the total number of timber sales on MFL group member FMUs.</p> <p>According to the utilization specialist, DNR publishes information on forest product market conditions three times per year. DNR maintains a wood using directory on primary and secondary producers in the state, which is in the process of being updated.</p>
<p>5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.</p>		<p>See 5.4.a. MFL is using information on smaller lands to increase options for timber harvesters and land owners that need to meet mandatory practices while still enjoying a profit.</p>
<p>5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	<p>C</p>	
<p>5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public</p>	<p>C</p>	<p>MFL open lands provide opportunities for recreational hunting to the general public. All navigable waters (‘wet ankle’ rule) on MFL properties are also open to the public since they are regulated by the state. MFL plans include a general section on the impacts of the forest practices on forest carbon. Implementing BMPs on</p>



values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.		MFL lands indirectly reduces impacts to water quality and fisheries.
5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.	C	For MFL group members, the primary benefits are on open lands. Most game species, such as deer and turkey, are compatible and even depend on forest management for cover and food sources.
<b>C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</b>	<b>NE</b>	
5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.  The sustained yield harvest level calculation for each planning unit is based on: documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; mortality and decay and other factors that affect net growth; areas reserved from harvest or subject to harvest restrictions to meet other management goals; silvicultural practices that will be employed on the FMU; management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.	NA	MFL only consists of SLIMF group members.
FF Indicator 5.6.a On family forests, a sustained yield harvest level analysis shall be completed. Data used in the analysis may include but is not limited to: - regional growth data; - age-class and species distributions; - stocking rates required to meet management objectives; - ecological and legal constraints; - empirical growth and regeneration data; and, - validated forest productivity models.	C	On most MFL properties, a land exam is conducted to determine current species composition, age classes, and stocking levels and use this information to classify stands. Volume, basal area, site index, and trees per acre are estimated for each stand. Soil information is included for each stand. The DNR or cooperating service provider will then use this information to create mandatory practices intended to meet harvest, growth, and regeneration objectives while considering constraints based on productivity, protected sites, and wildlife goals as described in the property-specific management plan. Prescriptions are often based on the DNR's Silvicultural Handbook, which is updated frequently and based on validated forest productivity models throughout the state. Pre- and post-harvest timber cruises, when done, ensure that growth and regeneration assumptions are consistent with validated forest productivity models. This is an area where examination should be done in future years, e.g. 2019, evaluating recent changes in post-harvest inspections/monitoring.  Harvest timing is estimated via projected growth data (based on growth and yield data from FIA and the State of Wisconsin) and

		only occurs if estimated volume is available for harvest. Because of this type of regulation system, there is no need for each individual small parcel in the MFL to have a sustained yield harvest level. Other DNR requirements such as BMPs, NHI searches, Ecological Landscape considerations, Invasive BMPs ensure ecological and legal constraints are factored into harvest levels for each property.
5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	NA	MFL only consists of SLIMF group members.
FF Indicator 5.6.b. On family forests, harvest levels and rates do not exceed growth rates over successive harvests, contribute directly to achieving desired future conditions as defined in the forest management plans, and do not diminish the long term ecological integrity and productivity of the site.	C	On MFL properties observed in 2018 there were regeneration harvests for aspen, oak, and pine occurring in central Wisconsin but the predominant cover types observed were northern and central hardwoods managed by thinnings. Through retention of larger trees for wildlife and future timber value while commonly allowing for regeneration patch cuts, there is very low risk that harvest rates exceed growth rates. Thinnings may occur three-five times over the lifetime of a typical stand based on site productivity and current markets for harvested material. In some cases, oak stands are regenerated using clearcuts or shelterwood systems at the end of the rotation to start another cycle of thinnings.  Regulation system implemented as described in 5.6.a ensures harvest levels are sustained over successive harvests.
5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	C	Several mature to overmature small aspen stands were visited in the 2016 assessment, which were planned for harvest in 2016-17. These were the only areas where a lack of a timely harvest could lead to a loss in yield, but DNR and MFL cooperating service providers are aware of some ways to make these sales more attractive to potential bidders. There is still a sizeable window of time to address the health and stocking issues in these stands. All other timber types and stands visited were being harvested under silvicultural systems and rates that will result in sufficient regeneration of targeted species.
5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	NA	There are no NTFPs harvested in significant or commercial quantities that would lead to significant impact on timber and other forest resources, as confirmed through interviews with MFL group members, DNR foresters, and other stakeholders.  The most common NTFP that could affect timber production objectives is tapping for maple sugar resources. This is not practiced across the entire group and usually only on small parcels within a given MFL property, thus ensuring that impacts to timber production remain localized.
<b>P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</b>		
<b>C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level</b>	C	

<p><b>considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</b></p>		
<p>6.1.a. Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:</p> <ol style="list-style-type: none"> <li>1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>;</li> <li>2) <i>Rare, Threatened and Endangered (RTE) species</i> and <i>rare ecological communities</i> (including plant communities);</li> <li>3) Other habitats and species of management concern;</li> <li>4) Water resources and associated riparian habitats and hydrologic functions;</li> <li>5) <i>Soil resources</i>; and</li> <li>6) <i>Historic conditions</i> on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.</li> </ol>	<p>C</p>	<p>Items 1-6 are addressed in each group member’s FMP and the Cutting Notice &amp; Report. DNR reviews and approve Cutting Notices when legislatively mandated and when requested by landowners. In the past, the post-harvest land exam served as the main information collecting step on stands and plant communities however this is changing as new Act requirements become codified. This merits further review in 2019. Some landowner files contain NRCS soil information and maps as well. Maps prepared often include water features.</p>
<p>6.1.b. Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the <i>best available information</i>, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	<p>C</p>	<p>The short and long-term impacts of planned management activities on the listed elements are reviewed during preparation of the FMP and, when a planned management activity is scheduled, documented on the Cutting Notice &amp; Report.</p>
<p>6.1.c. Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>	<p>C</p>	<p>For each stand identified in each group member’s FMP, there are mandatory practices that take into account environmental constraints and potential negative impacts while accomplishing objectives related to timber production, wildlife, and water resources. When a harvest is scheduled, modifications to planned practices may occur prior to harvesting that are consistent with this indicator.</p>
<p>6.1.d. On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	<p>NA</p>	<p>MFL Program does not contain any public lands. This indicator is not applicable.</p>
<p><b>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats</b></p>	<p>C</p>	

<p><b>(e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</b></p>		
<p>6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	NA	See FF Indicator 6.2.a.
<p>FF Indicator 6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. A secondary review of the survey does not need to be included in the process. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	C	Natural Heritage Inventory (NHI) surveys of each MFL property are completed prior to preparing a forest management plan and before a harvest (as documented on Cutting Notices). If the NHI query indicates possible presence of forest-dwelling RTE species, management occurs with the assumption that the species are present. Auditors observed an overall level of conformance with these requirements, including mitigation measures to protect each NHI-identified species on the properties evaluated
<p>6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. <b>Conservation zones</b> and/or <b>protected areas</b> are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	C	See description for FF Indicator 6.2.a. Conservation zones and/or protected areas have been established for sites that contain or may contain RTE species. Examples of these mitigations were observed on the FMUs evaluated.
<p>6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.</p>	NA	The MFL Program does not contain any public lands. This indicator is not applicable.
<p>6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	C	MFL members consist of private lands with two tax rates depending on if an ownership is enrolled as publicly-accessible in the program. Trespass incidents are mostly limited to hunting without permission, particularly on those properties that are not available to public use. Some members gate properties, place signage, and conduct inspections to dissuade trespassers.

		Violations of wildlife laws is controlled through DNR Law Enforcement.
<b>C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</b>	C	
<b>C6.3.a. Landscape-scale indicators</b>		
6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	Maintaining and enhancing under-represented successional stages occurs through implementation of the WI DNR Silviculture Handbook. Additionally, NHI includes some under-represented communities.
6.3.a.2. When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <i>conservation zones</i> and/or <i>protected areas</i> are established where warranted.	C	Rare ecological communities are identified through NHI and by following the Silviculture Handbook. Additionally, the Ecological Landscapes Handbook is used by MFL Certified Plan Writers and Cooperating Foresters to help identify and manage for rare community types.
6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all <b>Type 1</b> and <b>Type 2 old growth</b> . Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.  Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).  Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).  On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).	C	If identified, Type 1 and Type 2 old growth is to be managed in accordance with the WI DNR Old Growth and Old Forests Handbook. This handbook is meet 6.3.a.3 requirements for ensuring protection of old growth. Old growth is very rare in Wisconsin, and occurrences on MFL properties have not been identified.  No public or tribal lands are within the scope of the certificate, so those portions of this indicator are not applicable.

<p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> <li>1. Old growth forests comprise a significant portion of the tribal ownership.</li> <li>2. A history of forest stewardship by the tribe exists.</li> <li>3. High Conservation Value Forest attributes are maintained.</li> <li>4. Old-growth structures are maintained.</li> <li>5. Conservation zones representative of old growth stands are established.</li> <li>6. Landscape level considerations are addressed.</li> <li>7. Rare species are protected.</li> </ol>		
<p>6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	NA	<p>Given the relatively small size of the ownerships in the MFL Program, this indicator is not applicable.</p>
<p>6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of <b>Riparian Management Zones (RMZs)</b> to provide:</p> <ol style="list-style-type: none"> <li>a) habitat for aquatic species that breed in surrounding uplands;</li> <li>b) habitat for predominantly terrestrial species that breed in adjacent <b>aquatic habitats</b>;</li> <li>c) habitat for species that use riparian areas for feeding, cover, and travel;</li> <li>d) habitat for plant species associated with riparian areas; and,</li> <li>e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</li> </ol>	C	<p>Conformance with WI DNR BMPs for riparian habitat and water quality requirements of this indicator was observed. RMZs were respected, and any harvests within the RMZs were limited to selection cuts. Some group members conducted tree plantings in RMZs that were previously grazed to provide shade and woody debris.</p>
<p><b>Stand-scale Indicators</b> 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>		<p>Species composition, distribution, and frequency of occurrence are covered by the WI DNR Silviculture Handbook. MFL properties are required to implement the Silviculture Handbook, and conformance with these requirements was observed during the evaluation. The Silvicultural Manual emphasizes that uneven-aged management systems are to be used to continually develop quality growing stock, and this was observed on the ground.</p>
<p>6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. <b>Native species</b> suited to the site are normally selected for regeneration.</p>		<p>Nearly all seedlings are obtained from the WI DNR state nurseries. Local sources are used when available, and the local DNR forester must approve tree planting species lists. Observed conformance with planting of red oak, red pine, and other species from the state nursery using local sources of known provenance.</p>
<p>6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in</p>		<p>Requirements of this indicator are covered in the Silviculture Handbook. Observed overall conformance with requirements for stand level habitat, especially in areas where large, un-</p>

<p>abundance and distribution that could be expected from naturally occurring processes. These components include:  a) large live trees, live trees with decay or declining health, <b>snags</b>, and well-distributed coarse down and dead woody material. <b>Legacy trees</b> where present are not harvested; and  b) vertical and horizontal complexity.  Trees selected for <b>retention</b> are generally representative of the dominant species found on the site.</p>		<p>merchantable oaks can develop into snag and den trees. Many of these large-sized oaks exhibit the qualities of legacy trees that were maintained when the area was under pasture or agriculture.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when <b>even-aged systems</b> are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, 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 the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		<p>Requirements of this indicator are covered in the Silviculture Handbook. Observed overall conformance with this requirement in even-aged management treatments.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> <li>1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture).</li> <li>2. Is based on the totality of the <b>best available information</b> including peer-reviewed science regarding natural disturbance regimes for the FMU.</li> <li>3. Is spatially and temporally explicit and includes maps of proposed openings or areas.</li> <li>4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species.</li> <li>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</li> </ol>	<p>NA</p>	<p>There have not been any deviations from even-aged management restrictions on group member FMUs. This indicator is not applicable.</p>
<p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <b>invasive species</b>, including:</p> <ol style="list-style-type: none"> <li>1. a method to determine the extent of invasive species and the degree of threat to native</li> </ol>	<p>C</p>	<p>Invasive species are assessed during the writing of forest management plans and prior to each harvest. Interviews with WI DNR foresters and private consulting foresters indicated a high level of awareness about invasive plant problems as noted on numerous sites visited during the 2018 audit (see Site Notes).</p>

<p>species and ecosystems;</p> <ol style="list-style-type: none"> <li>2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</li> <li>3. eradication or control of established invasive populations when feasible: and,</li> <li>4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</li> </ol>		<p>Cutting Notices and FMPs include an accounting of invasive plants. Herbicide treatment of invasives is conducted on some properties to help to control populations of invasive plants as noted in Site Notes.</p>
<p>6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>		<p>Fuels management occurs in accordance with the Silviculture Handbook and DNR Forest Management Guidelines. Fire on group member properties is used to control slash or invasive species and as a site preparation tool. Public safety measures and seasonal restrictions are adhered to.</p>
<p><b>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</b></p>	<p>C</p>	
<p>6.4.a. The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the <i>landscape</i> (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) <b>GAP analyses</b>; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p> <p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p>	<p>NA</p>	<p>See FF Indicator 6.4.a.</p>
<p>FF Indicator 6.4.a For family forests, the forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape (see Criterion 7.1). The consultation and assessment process may be more informal; however, on all FMUs, outstanding examples of common community types (e.g., common types with Natural Heritage viability rankings of A and B) are identified in the assessment to be protected or managed to maintain their conservation value.</p>		<p>A GAP analysis was completed and Wisconsin’s State Natural Area (SNA) program has documented locations of native ecosystems. Representative sites are adequately protected across the state through SNAs on public lands, including public lands managed by the DNR and counties, and on lands owned or managed by conservation organizations.</p> <p>If additional outstanding examples arise on MFL, these would be protected through the NHI process, which includes native plant communities. This was confirmed in interviews with local DNR foresters.</p>
<p>6.4.b. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p>	<p>NA</p>	<p>See FF Indicator 6.4.b.</p>



Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.		
FF Indicator 6.4.b: Low risk of negative social or environmental impact. However, on all FMUs where outstanding examples of common community types exist (see Guidance for 6.4.a.), they should be protected or managed to maintain their conservation value.	C	There is a low risk negative social or environmental impact because Criterion 6.4 is met on lands outside of the MFL program.
6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.	NA	There are no RSAs on properties enrolled in the MFL program. This indicator is not applicable.
6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.	C	The need for RSAs on MFP properties would be detected and protected through the NHI process that is updated at least annually.
6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	NA	All lands enrolled in the MFL Program are private. This indicator is not applicable.
<b>C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</b>	C	
6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	The existence of the Wisconsin BMPs for Water Quality, Wisconsin Forest Management Guidelines, and other manuals produced by DNR, meets this requirement.
6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	NC	See <b>Minor CAR 2018.1</b> .
6.5.c. Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: <ul style="list-style-type: none"> <li>Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard.</li> </ul>	C	MFL's implementation of BMPs, Biomass Harvest Guidelines, and Silviculture Handbook result in conformance with the bulleted requirements of 6.5.c.

<ul style="list-style-type: none"> <li>• Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site.</li> <li>• Rutting and compaction is minimized.</li> <li>• Soil erosion is not accelerated.</li> <li>• Burning is only done when consistent with natural disturbance regimes.</li> <li>• Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives.</li> <li>• Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed.</li> <li>• Low impact equipment and technologies is used where appropriate.</li> </ul>		
<p>6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> <li>• access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts;</li> <li>• road density is minimized;</li> <li>• erosion is minimized;</li> <li>• sediment discharge to streams is minimized;</li> <li>• there is free upstream and downstream passage for aquatic organisms;</li> <li>• impacts of transportation systems on wildlife habitat and migration corridors are minimized;</li> <li>• area converted to roads, landings and skid trails is minimized;</li> <li>• habitat fragmentation is minimized;</li> <li>• unneeded roads are closed and rehabilitated.</li> </ul>	C	See <b>OBS 2018.2.</b>
<p>6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written <b>Streamside Management Zone (SMZ) buffer</b> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ</p>	C	<p>MFL’s implementation of BMPs for Water Quality covers this requirement and has a built-in variance mechanism in case minor deviations from minimum BMPs are required to restore riparian tree species composition or conduct other activities intended to restore or protect hydrologic functions in the long-term.</p> <p>RMZs observed in the field demonstrated conformance to this requirement.</p>

widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.		
6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.	NA	No variations from minimum SMZ widths are allowed and none were observed. This indicator is not applicable.
6.5.f. Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of <b>aquatic habitat</b> . Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.	C	MFL's implementation of BMPs for Water Quality result in conformance to this requirement. Stream crossings reviewed during the evaluation demonstrated conformance.
6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	C	Given their small size and that recreational use is typically limited to family and friends of landowner, MFL properties conform to 6.5.g. On both the publicly-open properties in the program and the ones not open to the public, no instances of damage arising from recreation during the evaluation were observed
6.5.h. Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.	C	Grazing is prohibited by statute on MFL properties. No such grazing was detected on site visits during the evaluation.
<b>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</b>	C	
6.6.a. No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).	C	A review of the chemical list maintained by DNR of all group member applications reported demonstrates that no FSC Highly Hazardous Pesticides are used on areas within the scope of the certificate.

<p>6.6.b. All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>	<p>NA</p>	<p>See FF Indicator 6.6.b.</p>
<p>FF Indicator 6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Family forest owners/managers may use brief and less technical written procedures for applying common over-the-counter products. Any observed misuse of these chemicals may be considered as violation of requirements in this Indicator. Whenever feasible, an eventual phase-out of chemical use is included in the strategy.</p>	<p>C</p>	<p>The MFL program has a demonstrated record of implementing non-chemical options whenever feasible. All chemical applications by landowners requires a Chemical Use Reporting Form to be completed. FSC’s highly hazardous pesticides are prohibited and least toxic chemicals are generally the recommended choice.</p>
<p>6.6.c. Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.</p>	<p>C</p>	<p>Application methods are generally done via backpack spraying, and the written prescription typically follows the label rate (unless justified at alternative rate). MSDS recommended safety procedures and equipment are required.</p>
<p>6.6.d. Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and</p>	<p>C</p>	<p>All chemical applications by landowners requires a Chemical Use Reporting Form to be completed.</p>

<p>includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.</p>		
<p>6.6.e. If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	C	<p>Follow-up monitoring is completed by DNR foresters or Cooperating Foresters and/or MFL Foresters. One private consulting forester who was interviewed demonstrated a keen awareness of the type and concentration of chemicals he uses on the MFL properties that he manages, often reducing the concentration and still getting the same results. He also demonstrated an awareness of appropriate PPE and safety procedures to minimize personal exposure when applying chemicals.</p>
<p><b>C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</b></p>	C	
<p>6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills</p>	C	<p>No evidence of fuel or chemical spills was observed on harvest sites visited. Some harvests had been conducted by FISTA-trained loggers, which includes training on how to handle hazardous spills.</p>
<p>6.7.b. In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.</p>	C	<p>There was no evidence of spills. Loggers are required to adhere to FISTA regulations, which require that loggers be able to contain spills in a timely manner. Wisconsin BMPs cover the topic of this indicator.</p>
<p>6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.</p>	C	<p>Observed overall conformance with this requirement.</p>
<p><b>C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</b></p>	C	
<p>6.8.a. Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i>, insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.</p>	C	<p>WI DNR uses <i>Bacillus thuringiensis kurstaki</i> (Btk) and Nucleopolyhedrosis virus (Gypchek) to control gypsy moth and other forest pests. The safety and effectiveness of these treatments has been substantiated by the scientific literature and are guided by USDA protocols.</p>
<p>6.8.b. If biological control agents are used, they are applied by trained workers using proper equipment.</p>	C	<p>Btk and Gypchek are applied aerially by trained WI DNR contractors.</p>
<p>6.8.c. If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and</p>	C	<p>Use of Btk and Gypchek follows USDA protocols and plans, which are consistent with the content of this indicator. USDA documentation is available from USDA's website. Wisconsin DNR</p>

<p>internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.</p>		<p>also has several documents online about the application and monitoring of two biological controls.</p>
<p>6.8.d. Genetically Modified Organisms (GMOs) are not used for any purpose</p>	C	<p>There is no use of GMO trees.</p>
<p><b>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	C	
<p>6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p>	C	<p>Exotic tree species are not used on MFL properties. Although exotic seed mixes are used for erosion control, these are not considered invasive.</p>
<p>6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.</p>	C	<p>Some exotic seed mixes are used on wildlife food plots. However, food plots fall outside the scope of MFL properties, so this requirement is not applicable in those cases. Exotic seed mixes are used for erosion control, these are not considered invasive.</p>
<p>6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species</p>	C	<p>No impacts from exotic species have been identified.</p>
<p><b>C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</b>  <b>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</b></p>	C	
<p>6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>Under the MFL program, group members can have up to 20% of the FMU in non-productive area. If these areas include areas of forest converted to non-forest, such as food plots, these are excised from the scope of FSC as in some cases they would exceed the 2% limit established in this indicator. Food plots are mapped as part of management plans or cutting notices. DNR provided an update to the certificate scope to document these changes.</p> <p>MFL statute allows program participants to remove up to five acres from the MFL program for conversion to a building or other non-forest use. Removed acreage must be in whole (not partial) acreage units from one to five.</p>
<p>6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>There has been no conversion to non-forest land uses other than that acreage that the statute now allows can be removed from the program (and hence from the FSC certified area). See description for Indicator 6.10.a.</p>
<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	

<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	<p>C</p>	<p>Conversions from natural forest to plantation do not occur on the MFL properties, as confirmed via field observation. Most pine plantations were started well prior to the 1950s and are being managed for natural tree species that sites can support and be regenerated using seed-tree, shelterwood, and other techniques that rely on natural regeneration. As such, these stands are classified as natural or semi-natural based on management practices and stand trajectories.</p>
<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)</p>	<p>C</p>	<p>All land-use and stand-type conversions are described in MFL plans and/or Cutting Notices. Converted areas that meet 6.10.a-c may remain within the scope and consist mostly of areas designated for wildlife habitat or food plots. Natural heritage data is reviewed for these areas, thus biodiversity requirements are met. Stand-type conversions are justified based on forest and soil health and other site conditions, landowner objectives and typically do not qualify as conversion to non-forest use. These areas are evaluated for natural heritage data regardless of stand trajectory.</p>
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	<p>C</p>	<p>Such conversions are not permitted within the MFL program. MFL rules prohibits any activity that would preclude the practice of forestry, with one exemption made for climate or weather towers used for research purposes. In this case, the group member would have to ask for permission prior to construction.</p>
<p><b>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</b></p>		
<p><b>C7.1. The management plan and supporting documents shall provide:</b>  <b>a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</b>  <b>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</b>  <b>d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</b>  <b>h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</b></p>	<p>C</p>	

<p><b>i) Description and justification of harvesting techniques and equipment to be used.</b></p>		
<p>7.1.a. The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	<p>NA</p>	<p>See FF Indicator 7.1.a.</p>
<p>FF Indicator 7.1.a A written management plan exists for the property or properties for which certification is being sought. The management plan includes the following components:</p> <ul style="list-style-type: none"> <li>i. Management objectives (ecological, silvicultural, social, and economic) and duration of the plan.                      Guidance: Objectives relate to the goals expressed by the landowner within the constraints of site capability and the best available data on ecological, silvicultural, social and economic conditions.</li> <li>ii. Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information.                      Guidance: In addition to stand-level descriptions of the land cover, information in site-level plans may include: landscape within which the forest is located; landscape-level considerations; past land uses of the forest; legal history and current status; socio-economic conditions; cultural, tribal and customary use issues and other relevant details that explain or justify management prescriptions.</li> <li>iii. Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used.</li> <li>iv. Description of harvest limits (consistent with Criterion 5.6) and species selection. Also, description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate.</li> <li>v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).                      Guidance: Regional environmental assessments and safeguards or strategies to address pest and weed management, fire management, protection of rare, threatened, and endangered species and plant community types, protection</li> </ul>	<p>C</p>	<p>MFL group member files contain several documents that comprise the FMP and address the items of this indicator, including: Forest Management Plans (maps, objectives, quantitative and qualitative descriptions, silvicultural and other management systems, environmental assessment and safeguards, RTE species/ communities), Land Exams, Cutting Notices &amp; Reports, letters of communication from MFL staff, NRCS data (e.g., soil maps), NHI database results, and deed &amp; tax records.</p> <p>In addition to these property-specific management-related documents, there are several statewide policy and guidance documents that the WI DNR has developed which also are part of each management plan: WI DNR Forest Tax Law handbook, WI DNR Silviculture Handbook, WI DNR Forest Management Guidelines, WI DNR Private Forestry Handbook, timber sale contracts, BMPs for Water Quality, Ecological Landscapes Handbook, and BMPs for Invasive Species</p> <p>Stand descriptions include a qualitative and quantitative analysis of stand level data and information, including steps to achieve harvest, growth, and regeneration.</p> <p>Harvest limits can be monitored the state-level and county-level using Wisconsin DNR and US Forest Service data for the state.</p>



<p>of riparian management zones, and protecting representative samples of ecosystems and High Conservation Value Forests may be developed by state conservation agencies. Site specific plans for family forests should be consistent with such guidance and may reference those works for clarity.</p> <p>vi. Description of location and protection of rare, threatened, and endangered species and plant community types.</p> <p>vii. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8.</p> <p>viii. Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected areas in a manner that clearly relates to the forest description and management prescriptions.</p> <p>Guidance: Property level maps for family forests may be simple and efficient to produce, and may cover only the necessary information needed for management to the FSC-US Family Forest Standard. At the group level, if GIS is used coverage should include protected areas, planned management activities, land ownership, property boundaries, roads, timber production areas, forest types by age class, topography, soils, cultural and customary use areas, locations of natural communities, habitats of species referred to in Criterion 6.2, riparian zones and analysis capabilities to help identify High Conservation Value Forests. Group managers may rely on state conservation agencies for complex GIS services.</p>		
<p>7.1.b. The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</p>	<p>NA</p>	<p>See FF Indicator 7.1.b.</p>
<p>FF Indicator 7.1.b Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.</p>	<p>C</p>	<p>See <b>OBS 2018.3</b>.</p>
<p>7.1.c. The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.</p> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	<p>NA</p>	<p>See FF Indicator 7.1.a.</p>
<p>7.1.d. The management plan includes a description of the landscape within which the FMU is located and describes</p>	<p>NA</p>	<p>See FF Indicator 7.1.a.</p>

<p>how landscape-scale habitat elements described in Criterion 6.3 will be addressed. FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>		
<p>7.1.e. The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</p> <ul style="list-style-type: none"> <li>• rare, threatened, or endangered species and natural communities (see Criterion 6.2);</li> <li>• plant species and community diversity and wildlife habitats (see Criterion 6.3);</li> <li>• water resources (see Criterion 6.5);</li> <li>• soil resources (see Criterion 6.3);</li> <li>• Representative Sample Areas (see Criterion 6.4);</li> <li>• High Conservation Value Forests (see Principle 9);</li> <li>• Other special management areas.</li> </ul> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.f. If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j). FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.g. The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8). FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.h. If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6. FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.i. If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8. FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.j. The management plan incorporates the results of the evaluation of social impacts, including:</p> <ul style="list-style-type: none"> <li>• traditional cultural resources and rights of use (see Criterion 2.1);</li> <li>• potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2);</li> <li>• management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5);</li> <li>• management of aesthetic values (see Indicator 4.4.a);</li> <li>• public access to and use of the forest, and other recreation issues;</li> </ul>	NA	See FF Indicator 7.1.a.

<ul style="list-style-type: none"> <li>local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g).</li> </ul> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>		
<p>7.1.k. The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</p> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.l. The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.</p> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.m. The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.</p> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.n. The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.</p> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.o. The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.</p> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.p. The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.</p> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.q. Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.</p> <p>FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	See FF Indicator 7.1.a.
<p>7.1.r. The management plan describes the stakeholder</p>	NA	See FF Indicator 7.1.a.

consultation process. FF Indicator Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.		
<b>C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</b>	C	
7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.	C	As detailed in 7.1.a, several WI DNR policies and guidance documents make up part of the forest management plan for properties enrolled in the MFL program (WI DNR Forest Tax Law handbook, WI DNR Silviculture Handbook, WI DNR Forest Management Guidelines, WI DNR Private Forestry Handbook, timber sale contracts, BMPs for Water Quality, Ecological Landscapes Handbook, and BMPs for Invasive Species). These documents are revised to respond to changing conditions at least every 10 years. The property-specific Forest Management Plan does not have a regular revision schedule within its 25- or 50-year term. However, DNR staff do regularly update the Cutting Notice to reflect changing conditions specific to an MFL property.
<b>C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</b>	C	
7.3.a. Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	Observed proper implementation of the management plan by well-trained forester and loggers. Evidence of training includes: (1) Cooperating Foresters are required to complete 10 hours training per year; (2) through FISTA, DNR provides training sessions for loggers; (3) Certified Plan Writers, DNR Foresters, supervisors and other DNR staff who administer the MFL program must attend the annual MFL Recertification training; and (4) DNR collaborates with Wisconsin Woodland Owners Association and UW-Extension to offer meetings and field days for landowners.
<b>C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</b>		
7.4.a. While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	The collection of documents comprising the management plan and management planning process are part of the public record and as such are publicly available.
7.4.b. Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.	NA	MFL Program does not contain any public lands. This indicator is not applicable.
<b>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</b>		
<b>C8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative</b>	C	

<p><b>complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</b></p>		
<p>8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.</p>	NA	MFL only consists of SLIMF group members.
<p>FF Indicator 8.1.a For Family Forests, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol. Monitoring may be scaled to the size and intensity of the management operations that affect the resources identified in C8.2.</p>	C	<p>Monitoring occurs after harvest, The Cutting Notice &amp; Cutting Report contain pre-harvest estimations and post-harvest volumes as reported by landowners, consulting foresters, and/or mills. These volumes are reviewed by Tax Specialists. Cutting report inspection procedures are outlined in the Tax Law Handbook.</p>
<p><b>C8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</b></p>	C	<p>a) Yield – Cutting production reports</p> <ul style="list-style-type: none"> <li>• All certified MFL lands when harvest are required to submit Cutting Reports which include volumes harvested.</li> </ul> <p>b) growth rates, regeneration, and condition of the forest are generally monitored through the WI DNR and use of federal FIA data. However, the WI DNR has several initiatives to supplement these including:</p> <ul style="list-style-type: none"> <li>• Summer 2018 - 8 LTE foresters (limited term employment), doing regeneration survey across entire state, including MFL private lands. The plan is to match these up to recent harvests of MFL lands. DNR is specifically planning to examine effects of deer browse and other influencing factors.</li> <li>• Productivity requirement:             <ul style="list-style-type: none"> <li>○ To maintain MFL eligibility landowners will have to maintain productivity which is 20 cords/acre/year to remain in the program which is currently being done by DNR forest specialists. DNR is also exploring potential sampling approaches to make this process more efficient.</li> <li>○ Potential regeneration impacts may also be assessed relative to productivity requirements.</li> </ul> </li> </ul> <p>c) composition and observed changes in flora and fauna</p> <ul style="list-style-type: none"> <li>• DMAP program managed by wildlife staff and landowners can requests forester/wildlife biologist to develop specific forest management planning to manage deer habitat.</li> </ul> <p>d) environmental and social impacts of harvesting and other operations.</p> <ul style="list-style-type: none"> <li>• Economic fact sheet (2016 data) with direct and indirect economic benefits.</li> </ul> <p>e) cost, productivity, and efficiency of forest management</p>
<p>8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	C	<p>Topics a-f are monitored on MFL properties. Evidence:</p> <ul style="list-style-type: none"> <li>• Operations specialist produces a Stumpage Report which summarizes cutting volumes on an annual basis by species and product class.</li> </ul>

		<ul style="list-style-type: none"> <li>• MFL Land Exams which occur prior to sending out Mandatory cutting notices to landowners.</li> <li>• Forest Tax Handbook, Chapter 21-11</li> <li>• Public Lands Handbook Chapter 110-10 (Section 2460.5)</li> <li>• NR 46, Wis. Admin. Code</li> <li>• Ch. 77, Wis. Stats.</li> </ul>
8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	<p>Monitoring of unanticipated loss occurs through:</p> <ul style="list-style-type: none"> <li>• WI DNR Forest Health Surveys (aerial surveys)</li> <li>• Landowner identification resulting in visit from MFL Forester and/or WI DNR 6 forest health specialist positions are maintained covering the state. They serve as resources and are available to the public, industry, and cooperating foresters.</li> <li>• Unanticipated removal (i.e., timber theft) is uncommon and thus only monitored passively unless a landowner requests action in some manner.</li> </ul>
8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	
8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: <ul style="list-style-type: none"> <li>• Rare, threatened and endangered species and/or their <i>habitats</i>;</li> <li>• Common and rare plant communities and/or habitat;</li> <li>• Location, presence and abundance of invasive species;</li> <li>• Condition of protected areas, set-asides and buffer zones;</li> <li>• High Conservation Value Forests (see Criterion 9.4).</li> </ul>	C	Items 1-5 are monitored through the NHI data system, periodic timber cruises at time of writing management plan or pre/post-harvest inspection, and various WIDNR flora and fauna research across the State.
8.2.d.1. Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.	C	<p>Such monitoring occurs and is described in Forest Tax Handbook, Chapter 21-11.</p> <p>DNR piloted a monitoring protocol in 2017 for random selection of upcoming mandatory practices to ground-truth forest conditions but results were not presented during the 2018 audit.</p>
8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	Such monitoring occurs and is described in Forest Tax Handbook, Chapter 21-11.
8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	NA	See Family Forest applicability note and WI DNR determination of NA.
8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.	NA	See Family Forest applicability note and WI DNR determination of NA.
8.2.d.5. Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	See Principle 3.

<p>8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.</p>	<p>C</p>	<p>Timber management activities on non-industrial properties are structured and monitored to ensure revenue is sufficient to pay for the logging costs and the consulting forester. Since harvests typically only occur every 15-20 years there is little opportunity to assess productivity and efficiency of management on any regular basis. Land owners interviewed indicated that they use simple cost benefit calculations to determine efficiency of their overall management choices (i.e., enroll in MFL and manage for timber products). Such calculations include revenue from timber sales plus the tax savings compared with any costs of management and TSI work.</p>
<p><b>C8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</b></p>	<p>C</p>	
<p>8.3.a When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.</p>	<p>C</p>	<p>See Chapter 21 of Forest Tax Law Handbook and Cutting Notice form (2450-32). The certificate code and FSC claim are correct on the Cutting Notice. The Cutting Notice is the primary tool in use for determining FSC claims.</p>
<p>8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.</p>	<p>C</p>	<p>Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.</p>
<p><b>C8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b></p>	<p>C</p>	
<p>8.4.a The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.</p>	<p>C</p>	<p>The landowner ultimately determines if the plan objectives are being met and is responsible for this indicator. In the group manager role, DNR staff confirms consistency of the Cutting Notice (prescription) as required and landowners submit Cutting Reports with actual volumes removed. Also DNR staff records when such information is provided by the landowner.</p>
<p>8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.</p>	<p>C</p>	<p>Interviews with field foresters and reviews of MFL property documents confirmed that monitoring is occurring and necessary revisions to plans are implemented. In 2018, plans were updated after cutting notices and reports were finalized. Where stand conditions differed from descriptions provided in initial recon information, pre-harvest inventory information was used to justify the harvest prescriptions recorded on the cutting notice.</p> <p>Forest regeneration in Wisconsin faces numerous challenges, among them herbivory activity by both white-tail deer and elk in different geographic areas of the state. One approach put into place by WIDNR in 2016 is the <i>Natural Regeneration Ad Hoc Team</i>. The Division of Forestry created a Natural Regeneration Ad Hoc Team to review and recommend natural regeneration monitoring protocols to provide a more cohesive statewide strategy for achieving successful natural regeneration. Forest regeneration was identified as an implementation issue in the</p>

		<p>Division’s prior Strategic Direction. Forest regeneration monitoring was also identified as an opportunity for improvement in forest certification audits on state and private lands.</p> <p>The team makeup included foresters from different management interests (DNR, forest industry, county forest, private lands, and consulting foresters). They reviewed the DNR <u>Silviculture Handbook</u> guidance on regeneration monitoring methods and standards, standardize the format of regeneration for differing cover types (especially where lacking), develop efficient and effective monitoring protocols, collect and manage reforestation monitoring data, and define forester responsibilities in monitoring forest regeneration.</p> <p>One tool developed in 2017, in conjunction with the Nat’l Regen Ad Hoc Team, was a Forest Regeneration Matrix to be applied to help assess levels of herbivory. The final version was intended to be included in the DNR <u>Silviculture Handbook</u>, available to all DNR Foresters as well private sector foresters, land and resource managers, landowners, and others interested in regeneration assessment.</p> <p>Another area where regeneration concerns are placed into the decision-making process is through participation in the County Deer Advisory Councils (CDAC). Each county in Wisconsin has a CDAC with the charge to provide input and recommendations to DNR on deer management within their county. Started in 2017, Councils comprised of public citizens work with local DNR staff to schedule meetings, provide community outreach and an opportunity for public input, review population data and deer impacts on forests and agriculture, develop 3-year recommendations on county population objectives and create annual antlerless harvest quotas. The importance of sustainable forests and challenges with regeneration are regularly included in CDAC discussions.</p>
<p><b>C8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</b></p>	<p>C</p>	
<p>8.5.a While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.</p>	<p>C</p>	<p>Water monitoring is extensive and available both summarized and in detail and is publicly available online here, <a href="https://dnr.wi.gov/topic/surfacewater/monitoring.html">https://dnr.wi.gov/topic/surfacewater/monitoring.html</a>.</p>
<p><b>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p>		



Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance  
 Forest areas that are in or contain rare, threatened or endangered ecosystems  
 Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)  
 Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

Examples of forest areas that may have high conservation value attributes include, but are not limited to:

**Central Hardwoods:**

Old growth – (see Glossary) (a)

Old forests/mixed age stands that include trees >160 years old (a)

Municipal watersheds –headwaters, reservoirs (c)

Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)

Intact forest blocks in an agriculturally dominated landscape (refugia) (a)

Intact forests >1000 ac (valuable to interior forest species) (a)

Protected caves (a, b, or d)

Savannas (a, b, c, or d)

Glades (a, b, or d)

Barrens (a, b, or d)

Prairie remnants (a, b, or d)

**North Woods/Lake States:**

Old growth – (see Glossary) (a)

Old forests/mixed age stands that include trees >120 years old (a)

Blocks of contiguous forest, > 500 ac, which host RTEs (b)

Oak savannas (b)

Hemlock-dominated forests (b)

Pine stands of natural origin (b)

Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)

Fens, particularly calcareous fens (c)

Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)

Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern (b)

**Note:** In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.

In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.

**Note:** Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.

Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.

Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.

C9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value

C

<p><b>Forests will be completed, appropriate to scale and intensity of forest management.</b></p>		
<p>9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	C	<p>DNR’s assessment for HCVF concluded that to-date no HCVF has been identified on MFL properties. The assessment is ongoing because conservation values are assessed on every property at the time of enrollment (plan writing) and prior to timber harvests. The ongoing assessments for HCVF are done through use of the NHI databases, using RTE species guidance (<a href="http://dnr.wi.gov/topic/nhi/wlist.html">http://dnr.wi.gov/topic/nhi/wlist.html</a>) use of WI DNR Ecological Landscapes <a href="http://dnr.wi.gov/topic/landscapes/">http://dnr.wi.gov/topic/landscapes/</a>, as well as observations made by DNR and cooperating service providers.</p>
<p>9.1.b In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.</p>	NA	<p>MFL only consists of SLIMF group members.</p>
<p>FF Indicator 9.1.b In developing the assessment, the forest owner or manager consults with databases, qualified experts, and/or best available research and literature.</p>	C	<p>See 9.1.a.</p>
<p>9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.</p>	C	<p>All MFL group members’ management plans are available upon request to the public. The HCVF assessment conducted at the state-level is available on the Wisconsin DNR’s website.</p>
<p>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	NA	
<p>9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.</p>	NA	<p>To date, no HCVFs have been detected on MFL properties.</p>
<p>9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.</p>	NA	<p>MFL does not contain any public FMUs.</p>
<p><b>C9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</b></p>	NA	
<p>9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>	NA	<p>To date, no HCVFs have been detected on MFL properties.</p>

9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	NA	To date, no HCVFs have been detected on MFL properties.
9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	NA	To date, no HCVFs have been detected on MFL properties.
<b>C9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</b>	<b>NA</b>	
9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8. FF Indicator: Low risk of negative social or environmental impact for private family forests. Public lands must follow the requirements in Indicator 9.4.a.	NA	To date, no HCVFs have been detected on MFL properties.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	NA	To date, no HCVFs have been detected on MFL properties.
<p><b>Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</b></p> <p><b>SCS audit team determined that WI MFL properties are not plantations per se because they are using: 1) native species being natural regenerated through coppice or sprouting, or planting native stock, 2) FME matches tree species to habitat through use of habitat typing, and 3) FME does not use plantation practices (short-rotations, extreme soil disturbance and other intensive practices).</b></p>		
<b>APPENDICES</b>		
APPENDIX C: REGIONAL LIMITS AND OTHER GUIDELINES ON OPENING SIZES This Appendix contains regional Indicators and guidance pertinent to maximum opening sizes and other guidelines for determining size openings and retention. These Indicators are requirements based on FSC-US regional delineations  Indicator 6.3.g.1	NA	Not applicable in Lakes States.
APPENDIX E: STREAMSIDE MANAGEMENT ZONE (SMZ) REGIONAL REQUIREMENTS Indicator 6.5.e	NA	Not applicable in Lakes States.
APPENDIX F: HIGH CONSERVATION VALUE FORESTS Criterion 9.1 This Appendix addresses requirements for Criterion 9.1, assessing the presence of High Conservation Values (HCVs) on the FMU. Below are definitions, including FSC-	C	These are all addressed under indicator 9.1 in the table above.

<p>US regional-specific requirements and guidance, of the six HCVs that must be identified in the assessment. Terms that are italicized and bolded are further interpreted in the 'Definition of Terms' section below. As an additional resource for assessing the presence of HCVs, the 'HCVF Assessment Framework' is available on the FSC-US website, <a href="http://www.fscus.org">www.fscus.org</a>.</p>		
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## Appendix 7 – Tracking, Tracing and Identification of Certified Products

### SCS FSC Chain of Custody Indicators for Forest Management Enterprises

### SCS FSC Chain of Custody Indicators for Forest Management Enterprises

#### Version 7-0

REQUIREMENT	C/ NC	COMMENT/CAR
<b>1. Quality Management</b>		
1.1 The FME shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.	C	Mark Heyde, Forest Certification Coordinator has been appointed and has overall responsibility and authority for certification.
1.2 A system shall be implemented to track and trace all products that are sold with an FSC Claim. For group and multiple FMU certificates, this system shall also be documented.	C	Sales records requested were available auditors.
1.3 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	These records are maintained by the WI DNR including Cutting Reports.
<p>1.4 The FME shall define its forest gate(s) (check all that apply):</p> <p><i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i></p>		<p><input checked="" type="checkbox"/> <b>Stump</b> Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs <u>upon</u> harvest.</p> <p><input type="checkbox"/> <b>On-site concentration yard</b> Transfer of ownership of certified-product occurs at concentration yard under control of FME.</p> <p><input type="checkbox"/> <b>Off-site Mill/ Log Yard/ Port</b> Transfer of ownership occurs when certified-product is unloaded or paid for at purchaser’s facility or a facility under the purchaser’s control.</p> <p><input type="checkbox"/> <b>Auction house/ Brokerage</b> Transfer of ownership occurs at a government-run or private auction house/ brokerage.</p> <p><input type="checkbox"/> <b>Lump-sum sale/ Per Unit/ Pre-Paid Agreement</b> A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for <u>before</u> harvesting begins. Similar to a per-unit sale.</p> <p><input type="checkbox"/> <b>Log landing</b> Transfer of ownership of certified-product occurs at landing/yarding areas.</p> <p><input type="checkbox"/> <b>Other (Please describe):</b></p>

<p>1.5 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.</p>	<p>C</p>	<p>By law the timber on MFL timber must be segregated from non-MFL timber. On some sites visited the contract of sale included MFL and non-MFL timber. Interview with foresters and loggers confirmed segregation and described process for segregation. No issue identified.</p>
<p>1.6 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation.</i></p>	<p>C</p>	<p>Harvesting of timber does not occur until the contract for sale has been processed between the landowner and purchaser.</p>
<p>1.7 The FME has supported transaction verification conducted by SCS and Accreditation Services International (ASI) by providing samples of FSC transaction data as requested by SCS. <i>NOTE: Pricing information is not within the scope of transaction verification data disclosure.</i></p>	<p>X</p>	<p><b>N/A, no verification requested</b></p>
<p><b>2. Product Control, Sales and Delivery</b></p>		
<p>2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).</p>	<p>C</p>	<p>The Forest Tax Law Cutting Notice form (Form 2450-032 (R 10-16) <a href="http://dnr.wi.gov/files/PDF/forms/2400/2450-032.pdf">http://dnr.wi.gov/files/PDF/forms/2400/2450-032.pdf</a>), requires that the form being submitted is identified as either an MFL or a FCL property per a checkbox on page 1. On page 2 and subsequent volume reporting pages, the DNR’s Group Certificate Numbers are listed at the top of the page along with a checkbox indicating if the lands are certified or not. The Order Number is also required to be written on the form for proper reference. When reviewing CNs, WIDNR Foresters are required to ensure lands listed on the CN are either part of the Certified Group or not, by checking the individual order number in WisFIRS, following which they can correct any errors at this point.</p> <p>Determining if a landowner is included in the MFL Certified Group is information readily available to private sector foresters, loggers, industry, and other interested parties. WIDNR Division of Forestry maintains a list of all MFL order numbers/landowners that are part of the Certified Group on a public website <a href="http://dnr.wi.gov/topic/TimberSales/">http://dnr.wi.gov/topic/TimberSales/</a> which is easily accessed for verification. Additional information on the MFL Certified Group is also found on the webpage.</p>

<p>2.2 Information about all products sold shall be compiled and documented for all FMUs in the scope of certification, including:</p> <ol style="list-style-type: none"> <li>1) Common and scientific species name;</li> <li>2) Product name or description;</li> <li>3) Volume (or quantity) of product;</li> <li>4) Information to trace the material to the source of origin harvest block;</li> <li>5) Harvest date;</li> <li>6) If basic processing activities take place in the forest, the date and volume/quantity produced; and</li> <li>7) Whether or not the material was sold with an FSC Claim.</li> </ol>	<p>C</p>	<p>The approved Cutting Notice and Cutting Report of Wood Products from Forest Crop and Managed Forest Lands is completed and returned to Wisconsin DNR with the volume of products harvested following completion of the harvesting.</p>
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ol style="list-style-type: none"> <li>a) name and contact details of the FME;</li> <li>b) information to identify the customer, such as their name and address;</li> <li>c) date when the document was issued;</li> <li>d) product name or description, including common and scientific species name(s);</li> <li>e) quantity of products sold;</li> <li>f) the FME’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code;</li> <li>g) clear indication of the FSC claim for each product item or the total products as follows:             <ol style="list-style-type: none"> <li>i. the claim “FSC 100%” for products from FSC 100% product groups; or</li> <li>ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups.</li> </ol> </li> </ol>	<p>C</p>	<p>MFL Group members are required to include the certification code and claim, SCS-FM/COC-004622 FSC 100%, on sale documents (e.g. timber sale contracts, invoices, haul tickets or scale tickets) related to the sale of their certified timber.</p>
<p>2.4 If the sales documentation issued by the FME is not included with the shipment of the product and this information is relevant for the customer to identify the product as being FSC certified, the related delivery documentation has included the same information as required in indicator 2.3 and a reference linking it to the sales documentation.</p> <p><b>Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V3-0 Clauses 5.1 and 5.3</b></p>	<p>C</p>	<p>Timber contracts used for MFL sales identify location information, mills purchasing wood at the stump are responsible for documentation.</p>

<p>2.5 If the FME is unable to include the FSC claim and/or certificate code in sales or delivery documents, the required information has been provided to the customer through supplementary documentation (e.g. supplementary letters). In this case, the FME has obtained permission from SCS to implement supplementary documentation in accordance with the following criteria:</p> <ul style="list-style-type: none"> <li>a. there shall exist clear information linking the supplementary documentation to the sales or delivery documents;</li> <li>b. there is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation; and</li> <li>c. where the sales documents contain multiple products with different FSC claims, each product shall be cross-referenced to the associated FSC claim provided in the supplementary documentation.</li> </ul>	<p>NA</p>	<p>Required information is provided.</p>
<p>2.6 The FME may identify products exclusively made of input materials from small or community producers by adding the following claim to sales documents: “From small or community forest producers.” This claim can be passed on along the supply chain by certificate holders. <i>A forest management unit (FMU) or group of FMUs that meet(s) the small and low-intensity managed forest eligibility criteria (FSC-STD-1-003a) and addenda. A community FMU must comply with the tenure and management criteria defined in FSC-STD-40-004.</i></p>	<p>X</p>	<p>N/A, not a small or community producer; or does not wish to pass along this claim.</p>
<p><b>3. Labeling and Promotion</b></p>	<p>X</p>	<p><b>N/A, FME does not use/ intend to use trademarks and no trademark uses were detected during the audit.</b></p>
		<p><b>N/A, CW/FM certificates are not allowed to use FSC trademarks and no trademark uses were detected during the audit (Note: it is a Major nonconformity to 3.1 if CW/FM certificates are found to be using trademarks).</b></p>
<p>3.1 The FME shall adhere to relevant trademark use requirements of FSC-STD-50-001 described in the <i>SCS Trademark Annex for FMEs</i>.</p>		<p>Refer to evidence cited in applicable trademark checklist(s) cited below.</p>
<p><b>4. Outsourcing</b></p>	<p>X</p>	<p><b>N/A, FME does not outsource any COC-related activities, as confirmed via interviews, sales documentation, and field observation.</b></p>
		<p><b>N/A, FME outsources low-risk activities such as transport and harvesting, as confirmed via interviews, sales documentation, and field observation.</b></p>
<p>4.1 The FME shall provide the names and contact details of all outsourced service providers.</p>		



<p>4.2 The FME shall have a control system for the outsourced process and agreement which ensures that:</p> <ul style="list-style-type: none"> <li>a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership;</li> <li>b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement;</li> <li>c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing;</li> <li>d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use.</li> <li>e) The outsourcer does not further outsource the material.</li> <li>f) The outsourcer accepts the right of the certificate body to audit them.</li> </ul>		
<p><b>5. Training and/or Communication Strategies</b></p>		
<p>5.1 All relevant FME staff and outsourcers shall be trained in the FME’s COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME’s COC control system.</p>	<p>C</p>	<p>DNR staff demonstrated knowledge of COC requirements, CPW and consulting foresters interviewed also demonstrated such knowledge. DNR provides periodic training which is documented.</p>
<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings or communications, the intended frequency of COC training (e.g., training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc.).</p>	<p>C</p>	<p>DNR maintains records of COC training for forestry staff and documents such training when provided.</p>

## SCS Trademark Annex for FMEs: FSC Trademarks, FSC-STD-50-001 V2-0

- N/A, does not use/intend to use FSC trademarks for any purposes (finished with this section); or
- N/A, is fully integrated and all trademark uses are treated under the COC Annex to this report that includes a full review of FSC-STD-40-004 and FSC-STD-50-001.

### PART I: General Requirements for Use of the FSC Trademarks

(FSC “checkmark-and-tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)

<p><b>Description</b> of how the FME currently uses, or intends to use, FSC trademarks and/or labels, including but not limited to printed materials, Internet applications, on-product labeling, and other public-facing media:</p>	<p>FSC trademarks are used in timber sales documentation and sales promotion, on informational documents, and on public web-site.</p>						
<p><b>1.2 Trademark License Agreement and valid certificate</b>                  In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate.  <i>Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i></p>	<table border="0"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs
<input checked="" type="checkbox"/>	C						
<input type="checkbox"/>	NC						
<input type="checkbox"/>	C w/Obs						
<p><b>1.6 Product Group List</b>                  The products intended to be labeled or promoted as FSC certified have been included in the FME’s certified product group list.</p>	<table border="0"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs
<input checked="" type="checkbox"/>	C						
<input type="checkbox"/>	NC						
<input type="checkbox"/>	C w/Obs						
<p><b>Section 1.2 and 1.6 Evidence:</b> Verified copies of agreements held in SCS records, confirmed WI MFL documentation agrees with SCS records, and confirmed all on FSC database.</p>							
<p><b>1.3 Trademark License Code</b>                  The FSC trademark license code assigned by FSC to the FME accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</p>	<table border="0"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs
<input checked="" type="checkbox"/>	C						
<input type="checkbox"/>	NC						
<input type="checkbox"/>	C w/Obs						

<p><b>1.4 Trademark Symbol</b>                  The FSC logo and the ‘Forests For All Forever’ marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered.</p> <p>For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trademark portal and marketing toolkit.</p> <p>The symbol ® shall also be added to ‘FSC’ and ‘Forest Steward-ship Council’ at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure).</p> <p><i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i></p>	<table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input type="checkbox"/></td><td>N/A, one or more of noted exceptions applies</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input type="checkbox"/>	N/A, one or more of noted exceptions applies
<input checked="" type="checkbox"/>	C								
<input type="checkbox"/>	NC								
<input type="checkbox"/>	C w/Obs								
<input type="checkbox"/>	N/A, one or more of noted exceptions applies								
<p><b>2.1 Restrictions on using FSC trademarks</b>                  The FME <b>has not used</b> the FSC trademarks in the following ways:</p> <ol style="list-style-type: none"> <li>in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme;</li> <li>in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the FME, outside the scope of certification;</li> <li>to promote product quality aspects not covered by FSC certification;</li> <li>in product brand or company names, such as ‘FSC Golden Timber’ or website domain names;</li> <li>in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.</li> </ol>	<table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs		
<input checked="" type="checkbox"/>	C								
<input type="checkbox"/>	NC								
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<p><b>2.2 Translations</b>                  The name ‘Forest Stewardship Council’ has not been replaced with a translation. A translation may be included in brackets after the name, for example:                  Forest Stewardship Council® (translation)</p>	<table border="1"> <tr><td><input type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input checked="" type="checkbox"/></td><td>N/A</td></tr> </table>	<input type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input checked="" type="checkbox"/>	N/A
<input type="checkbox"/>	C								
<input type="checkbox"/>	NC								
<input type="checkbox"/>	C w/Obs								
<input checked="" type="checkbox"/>	N/A								
<p><b>Sections 1.3, 1.4, 2.1, and 2.2 Evidence:</b> Examined websites, timber sale documents, organization references and manuals. All communications are done in English with no translations.</p>									
<p><b>Sections 8 and 9 Graphic Rules</b>                  The FME has only used FSC logos that conform to the standard requirements governing:</p> <ul style="list-style-type: none"> <li>color and font (8.1-8.3);</li> <li>format and size (8.4-8.9);</li> <li>label placement (8.10); and</li> <li>‘Forests For All Forever’ marks (9.1-9.7).</li> </ul>	<table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input type="checkbox"/></td><td>N/A, not using FSC logo</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input type="checkbox"/>	N/A, not using FSC logo
<input checked="" type="checkbox"/>	C								
<input type="checkbox"/>	NC								
<input type="checkbox"/>	C w/Obs								
<input type="checkbox"/>	N/A, not using FSC logo								

<p><b>1.5 Trademark Use Approval</b>                  The FME has submitted all intended uses of the FSC trademarks to SCS for approval.                  OR                  The FME has <b>an approved trademark use management system</b> in place. (If the FME has a trademark use management system, complete Annex A.)</p> <p><i>4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p><b>Sections 1.5 Evidence:</b> Reviewed submitted TM in SCS records and confirmed FME records match. All documents examined during the audit were 100% in conformance with requirements.</p>	
<p style="font-size: 1.2em; margin: 0;"><b>PART II: On-Product Use of FSC Trademarks</b></p>	
<p style="font-size: 1.2em; margin: 0;"><b>PART III: Promotional Use of FSC Trademarks</b></p>	
<p><b>6.1 Catalogues, Brochures, and Websites</b>                  When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:</p> <ul style="list-style-type: none"> <li>• It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc.</li> <li>• If both FSC-certified and uncertified products are listed, then a text such as “Look for our FSC®-certified products” shall be used next to the promotional elements and the FSC-certified products shall be clearly identified.</li> <li>• If some or all the products are available as FSC certified on request only, this is clearly stated.</li> </ul>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using trademarks in catalogues/ brochures/websites
<p><b>6.2 Sales and Delivery Documents</b>                  When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: “Only the products that are identified as such on this document are FSC certified”.</p> <p><i>NOTE: Use of the FSC claim and certificate code on invoices does not qualify as FSC trademark use.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using trademarks on templates for FSC & non-FSC products

<p><b>6.3 Promotional Items</b>                  All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not labeling promotional items
<p><b>6.5 Trade Fairs</b>                  When the FSC trademarks are used for promotion at trade fairs, the FME has:</p> <ul style="list-style-type: none"> <li>a) clearly marked which products are FSC certified, or</li> <li>b) add an add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed.</li> </ul> <p><i>NOTE: Use of text to describe the FSC certification of the FME does not require a disclaimer.</i></p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A
<p><b>Section 6.6 and 6.7 Investment/Financial Claims</b>                  When investment companies or others are making financial claims based on the FME’s FSC certified operations, the FME has taken full responsibility for the use of the FSC trademarks.                  Any such claims have been accompanied by the disclaimer, “FSC is not responsible for and does not endorse any financial claims on returns on investments.”</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not making financial claims about FSC status
<p><b>7.1 and 7.2 Other Forestry Certification Scheme Logos</b>                  The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using other scheme logos
<p><b>7.3 Business Cards</b>                  The FSC trademarks have not used on business cards to promote the FME’s certification.                  The FSC logo or ‘Forests For All Forever’ marks are not used on business cards for promotion.                  A text reference to the FME’s FSC certification, with license code, is allowed, for example “We are FSC® certified (FSC® C#####)” or “We sell FSC®-certified products (FSC® C#####)”.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, approval granted prior to July 1, 2011
<p><b>7.4 Promotion with CB Logo</b>                  FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p><b>Sections 6.1 - 6.3, 6.5-6.7, 7.1-7. 4 Evidence:</b> Reviewed website, timber sales contracts and related documents, organization manuals and records.</p>	

<h2 style="margin: 0;">Annex A: Trademark use management system</h2>	<input checked="" type="checkbox"/> N/A, not using a trademark use management system
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<h2 style="margin: 0;">Annex B. Additional trademark rules for group FM certificate holders</h2>	<input type="checkbox"/> N/A, not a group FM certificate holder or group does not use any FSC trademarks
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<p><b>Annex B, 1.1</b> The group entity (or manager, or central office) shall ensure that all uses of the FSC trademarks by the group entity or its individual members are approved by the certification body prior to use, or that the group and its members have an approved trademark use management system in place. When seeking approval by the certification body, group members shall submit all approvals via the group entity or central office, and keep records of approvals. Alternative submission methods may be approved by the certification body.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
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<p><b>Section 1.1 Evidence:</b> Group manager submits all requests for approval on behalf of any and all group members and records of both FME and SCS compared to uses are consistent with requirements.</p>
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<p><b>Annex B, 1.2</b> The group entity shall not produce any document similar to an FSC certificate for its participants. If individual membership documents are issued, these statements shall be included:</p> <ul style="list-style-type: none"> <li>a) "Managing the FSC® certification program of SCS Global Services"</li> <li>b) "Group certification by SCS Global Services"</li> </ul>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not issuing individual membership documents
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<p><b>Annex B, 1.3</b> No other forest certification schemes' marks or names shall appear on any membership documents (as per clause 1.2) issued by the group in connection with FSC certification. <i>Note: This only applies to documents issued per Annex B, 1.2 and NOT other documents such as group procedures.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
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<p><b>Annex B, 1.4</b> Subcodes of members shall not be added to the license code.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
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<p><b>Sections 1.2, 1.3, and 1.4 Evidence:</b> Entity does not use certificates or sub-codes to group members. Group members are publicly listed on the WI DNR MFL website for companies to verify membership under the FSC group certificate. Additionally, if there are any questions DNR staff assist mills in tracking down verifications.</p>
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<p><b>End of 50-001 Checklist</b></p>
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## Appendix 8 – Peer Review and SCS Evaluation Team Response to Peer Review

There is no peer review required for this recertification evaluation.

## Appendix 9 – SLIMF Eligibility Criteria

An FMU qualifies as a 'SLIMF' if it is either a 'small' FMU OR managed as a 'low intensity' FMU. Per INT-STD-01-003\_01, the area of a small forest is defined in relation to productive forest area. Permanent protected areas and areas with other uses within the FMU that are clearly indicated in the FMP and on the ground are not considered when calculating the size of the FMU to be classified as a SLIMF. Any SLIMF FMU under the scope of the FME under evaluation must meet at least one of the following criteria:

<input type="checkbox"/> N/A – none of the FMU(s) under evaluation qualify as a SLIMF according to the criteria below.	
<input checked="" type="checkbox"/> 'Small' FMU(s)	<input type="checkbox"/> The scope of the certificate includes FMU(s) with productive area of 100 ha (247 acres) or less.
	<input checked="" type="checkbox"/> The scope of the certificate includes FMU(s) located in a country for which the definition for maximum size of "small" includes productive area larger than 100 ha (247 acres), but does not exceed 1,000 ha (2, 471 acres).
	<input type="checkbox"/> The scope of the certificate includes FMU(s) with productive area of 1000 ha (2,471 acres) or less where there is no FSC-accredited national initiative and the national stakeholders support the larger size-limit proposed by the certification body.
<input type="checkbox"/> 'Low intensity' FMU(s) – The scope of the certificate includes FMU(s) in which the rate of harvest is less than 20% of the mean annual increment (MAI) AND these FMUs meet one of the following additional criteria:	<input type="checkbox"/> The annual harvest from the total production forest area is less than 5000 cubic meters (2.1 million board feet).
	<input type="checkbox"/> The average annual harvest from the total production forest is less than 5000 m3 / year (2.1 million board feet / year) during the period of validity of the certificate as verified by harvest reports and surveillance audits.

## Appendix 10 – Group Management Programs

SCS audits Group entities and group members to the FSC Group Management Standard at least once over the course of the certificate. All Principles in the FSC Forest Management Standard are evaluated – during the full evaluation or reevaluation audit and once again over the course of validity of the certificate during annual surveillance audits. SCS will also audit group clients to the Group Management Standard if there have been substantial changes to group management or the scope of the certificate during the previous year, such as a large change in the number of group members or changes to the policies of administering the group.



**Detailed Observations for FSC-STD-30-005 FSC Standard for Group Entities in Forest Management Groups**

Requirement	C/NC	Comment/CAR
<b>PART 1 QUALITY SYSTEM REQUIREMENTS</b>		
<b>C1 General Requirements</b>		
1.1 The Group entity shall be an independent legal entity or an individual acting as a legal entity.	C	WI DNR is an established legal entity with proper authority to manage the group. WIDNR is authorized through Wisconsin Statute 15.34.
1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.	C	WI DNR is an established legal entity with authority for registration and payment of applicable fees. Evidence: Forest Tax Law handbook. Deed and proof of ownership are kept in each case file (MFL order #)
1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.	C	Forest Tax Handbook
1.4 The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards.	NC	Private Forestry Handbook Chapter 10 (starts 10-10) -Training requirements for Cooperating Foresters. DNR collaborates with Wisconsin Woodland Owner Association and UW-Extension to offer meetings and field days to offer land owner training.  However, multiple Tax Specialist foresters were unable to demonstrate knowledge of Wisconsin State BMPs when interviewed by auditors specifically related to practices and requirements for water bars installation. Furthermore, foresters interviewed did not have access to, or a copy of, Wisconsin BMPs for Water Quality in the field (none had copies in trucks or on phones except the Group Manager). When requested, foresters were not able to provide copies of BMP manuals to auditors in the field such that it was unclear how foresters would check timber sales set up for inspecting Cutting Notices or for inspecting Cutting Reports in the field. See Minor CAR 2018.4.
<b>C2 Responsibilities</b>		
2.1 The Group entity shall clearly define and document the division of responsibilities between the Group entity and the Group members in relation to forest management activities (for example with respect to management planning,	C	<b>Group Entity responsibilities:</b> Forest Tax Handbook- Group Manager 21-4 DNR Service Foresters 21-4 Cooperating Foresters 21-5

<p>monitoring, harvesting, quality control, marketing, timber sale, etc).</p> <p><i>NOTE: The actual division of responsibilities may differ greatly between different group certification schemes. Responsibilities regarding compliance to the applicable Forest Stewardship Standard may be divided between the Group entity and Group members in order to take into account of a landscape approach.</i></p> <p><i>SCS Guidance: It should be clear in documents what the responsibilities are of the Group entity, Group members (both SLIMF and Non-SLIMF members, as applicable), and other involved parties (e.g., contractors involved in group management).</i></p>		<p><b>SLIMF Group member responsibilities:</b> Forest Tax Handbook- Group Members 21-6</p>
<p>2.2 The Group entity shall appoint a management representative as having overall responsibility and authority for the Group entity’s compliance with all applicable requirements of this standard.</p>	C	<p>Katharine Haan has been appointed as the MFL certification Group Manager.</p> <p>See Observation 2018.5.</p>
<p>2.3 Group entity staff and Group members shall demonstrate knowledge of the Group’s procedures and the applicable Forest Stewardship Standard.</p>	C	<p>Demonstrated knowledge was adequate except for those topics covered by the CARs and Observations of this report.</p>
<p><b>C3 Group entity’s procedures</b></p>		
<p>3.1 The Group entity shall establish, implement and maintain written procedures for Group membership covering all applicable requirements of this standard, according to scale and complexity of the group including:</p>	C	<p>Forest Tax Handbook as provided below.</p>
<p>I. Organizational structure;</p>	C	<p>Forest Tax Handbook Chapter 21, page 21-4, The Group Organization – Roles and Responsibilities</p>
<p>II. Responsibilities of the Group entity and the Group members including main activities to fulfill such responsibilities (i.e. Development of management plans, sales and marketing of FSC products, harvesting, planting, monitoring, etc);</p>	C	<p>Forest Tax Handbook Chapter 21, page 21-4, The Group Organization – Roles and Responsibilities</p>
<p>III. Rules regarding eligibility for membership to the Group;</p>	C	<p>Forest Tax Handbook Chapter 21-5 and Chapter 22-2.</p>
<p>IV. Rules regarding withdrawal/ suspension of members from the Group;</p>	C	<p>Forest Tax Handbook Chapter 21-9 and 21-14.</p>
<p>V. Clear description of the process to fulfill any corrective action requests issued internally and by the certification body including timelines</p>	C	<p>Forest Tax Handbook Chapter 21-9, 21-10 and 21-14.</p>

<p>and implications if any of the corrective actions are not complied with;</p>		
<p>VI. Documented procedures for the inclusion of new Group members;</p>	<p>C</p>	<p>Forest Tax Handbook Chapter 21</p>
<p>VII. Complaints procedure for Group members.</p>	<p>C</p>	<p>Forest Tax Handbook Chapter 21</p>
<p>3.2 The Group entity’s procedures shall be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements.</p>	<p>NC</p>	<p>DNR maintains a Cutting Notice Registration list of private sector individuals that are either Cooperating Foresters (through DNR’s Cooperating Forester Program), Accredited Foresters (membership in SAF, ACF, WCF), or Other Professionals (5+ years’ experience). The CN Registration List is available to DNR Foresters when entering a Cutting Notice into the WisFIRS tracking system. A current check of the Registration list shows 442 individuals registered with 34 shown as Other Professionals (7.7%). An observational review of those Other Professionals registered indicates that most are either graduate foresters (20) or technicians (2) with a smaller percentage being logging contractors (12).</p> <p>Changes to the Forest Tax Section initiated July 1, 2017 resulted in fewer DNR Forester positions (34 vs. 140+) being directly involved in cutting notice review and processing, with higher level of staff knowledge and experience in forest tax law program administration with a more concentrated and consistent treatment of CNs and subsequent communications with private-sectors foresters, and other professionals. With fewer DNR Foresters charged with tax law work, staff plans to develop and cultivate strong working relationships with private sector foresters, other professionals, landowners, and logging contractors to tailor guidance and education on the CN process to specific cases and individuals.</p> <p>General educational opportunities related to Cutting Notices and timber sales can be found in several places.</p> <ul style="list-style-type: none"> <li>• A number of topics related to the MFL and FCL programs including timber harvesting and the video series on Cutting Notice preparation done in 2015 are maintained on the DNR Forestry Website for viewing <a href="http://dnr.wi.gov/topic/ForestLandowners/">http://dnr.wi.gov/topic/ForestLandowners/</a></li> </ul>

		<ul style="list-style-type: none"> <li>• The updated Forest Tax Law Handbook was released and includes changes in the CN process initiated both prior to and after Act 358. (The current version of the Forest Tax Law Handbook is available on-line.)</li> <li>• Additional resources providing information on Lake States silvicultural practices, forest management, and timber sales procedures can be found in the DNR Silviculture Handbook (reference), the Wisconsin Forest Management Guidelines, and the DNR Timber Sale Handbook, all available on-line at <a href="http://dnr.wi.gov/topic/ForestManagement/">http://dnr.wi.gov/topic/ForestManagement/</a></li> </ul> <p>See 3.3 for additional detail. See Minor CAR 2018.6.</p>
<p>3.3 The Group entity shall define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.</p>	<p>C</p>	<p>DNR maintains a Cutting Notice (CN) Registration List of private sector individuals that are either Cooperating Foresters (through DNR’s Cooperating Forester Program), Accredited Foresters (membership in SAF, ACF, WCF), or Other Professionals (5+ years’ experience). The CN Registration List is available to DNR Foresters when entering a Cutting Notice into the WisFIRS tracking system.</p> <p>Changes to the Forest Tax Section initiated July 1, 2017 resulted in fewer DNR Forester positions (34 vs. 120+, with some vacancies) being directly involved in cutting notice review and processing, with an anticipated higher level of staff knowledge and experience in forest tax law program administration with a more concentrated and consistent treatment of CNs and subsequent communications with private-sectors foresters, other professionals.</p> <p>Currently there has been no training specifically targeted to Other Professionals. General educational opportunities related to Cutting Notices and timber sales can be found in several places.</p> <ul style="list-style-type: none"> <li>• A number of topics related to the MFL and FCL programs including timber harvesting and the video series on Cutting Notice preparation done in 2015 are maintained on the DNR Forestry Website for viewing <a href="http://dnr.wi.gov/topic/ForestLandowners/">http://dnr.wi.gov/topic/ForestLandowners/</a></li> </ul>

		<ul style="list-style-type: none"> <li>• The updated Forest Tax Law Handbook will be released in 2017 and includes changes in the CN process initiated both prior to and after Act 358. (The current version of the Forest Tax Law Handbook is available on-line.)</li> <li>• Additional resources providing information on Lake States silvicultural practices, forest management, and timber sales procedures can be found in the DNR Silviculture Handbook (reference), the Wisconsin Forest Management Guidelines, and the DNR Timber Sale Handbook, all available on-line at <a href="http://dnr.wi.gov/topic/ForestManagement/">http://dnr.wi.gov/topic/ForestManagement/</a></li> </ul> <p>Websites with video series, current and draft Forest Tax Law Handbook were reviewed relative to this topic, and the reference materials listed on the Forest Management page of the website above were confirmed. Interviews with consultants in the field confirmed knowledge of the above references and inspection of these sites were in conformance. WIDNR procedures around review of CN prior to harvests and post-harvest inspections were examined over multiple sites in the field for each category of the Registration List (reviewed in office portion of the audit). Field inspections, document review and interviews in the field demonstrated effective implementation and effective internal control systems.</p>
<p>3.4 The Group entity or the certification body shall evaluate every applicant for membership of the Group and ensure that there are no major nonconformities with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the Group, prior to being granted membership of the Group.</p> <p><i>NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.</i></p>	C	Forest Tax Handbook Chapter 21 and see Section 20-11.
<p><b>C4 Informed consent of Group members</b></p>		
<p>4.1 The Group entity shall provide each Group member with documentation, or access to documentation, specifying the relevant terms and conditions of Group membership. The documentation shall include:</p>	C	Forest Tax Handbook Chapter 21
<p>i. Access to a copy of the applicable Forest Stewardship Standard;</p>	C	Forest Tax Handbook Chapter 21

ii. Explanation of the certification body's process;	C	Forest Tax Handbook Chapter 21
iii. Explanation of the certification body's, and FSC's rights to access the Group members' forests and documentation for the purposes of evaluation and monitoring;	C	Forest Tax Handbook Chapter 21
iv. Explanation of the certification body's, and FSC's requirements with respect to publication of information;	C	Forest Tax Handbook Chapter 21
v. Explanation of any obligations with respect to Group membership, such as:  <i>NOTE: In some groups, it may be sufficient to provide individual members with a summary of these items, provided that full documentation is readily available on request at the Group entity's offices. The information should be presented in a way adapted to the language and knowledge of the Group members.</i>	C	Forest Tax Handbook Chapter 21
a. maintenance of information for monitoring purposes;	C	Forest Tax Handbook Chapter 21
b. use of systems for tracking and tracing of forest products;	C	Forest Tax Handbook Chapter 21
c. requirement to conform with conditions or corrective action requests issued by the certification body and the group entity	C	Forest Tax Handbook Chapter 21
d. any special requirements for Group members related to marketing or sales of products within and outside of the certificate;	C	Forest Tax Handbook Chapter 21
e. other obligations of Group membership; and	C	Forest Tax Handbook Chapter 21
f. explanation of any costs associated with Group membership.	C	Forest Tax Handbook Chapter 21
4.2 A consent declaration or equivalent shall be available between the Group Entity and each Group member or the member's representative who voluntarily wishes to participate in the Group. The consent declaration shall:  <i>NOTE: A consent declaration does not have to be an individual document. It can be part of a contract or any other document (e.g. meeting minutes) that specifies the agreed relationship between the Group member and the Group entity.</i>	C	Forest Tax Handbook Chapter 21
i. include a commitment to comply with all applicable certification requirements;	C	Forest Tax Handbook Chapter 21
ii. acknowledge and agree to the obligations and responsibilities of the Group entity;	C	Forest Tax Handbook Chapter 21

iii. acknowledge and agree to the obligations and responsibilities of Group membership;	C	Forest Tax Handbook Chapter 21
iv. agree to membership of the scheme, and	C	Forest Tax Handbook Chapter 21
v. authorize the Group entity to be the primary contact for certification and to apply for certification on the member's behalf.	C	Forest Tax Handbook Chapter 21
<b>C5 Group Records</b>		
5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include:  <i>NOTE: The amount of data that is maintained centrally by the Group entity may vary from case to case. In order to reduce costs of evaluation by the certification body, and subsequent monitoring by FSC, data should be stored centrally wherever possible.</i>	C	Records maintained in forestry offices in each County. Verified in Counties selected for this audit.
i. List of names and contact details of Group members, together with dates of entering and leaving the Group scheme, reason for leaving, and the type of forest ownership per member;	C	MFL Property Files at each county office. Verified for all MFL properties visited in 2018 audit.
ii. Any records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard;	C	Training records verified for MFL foresters at DNR offices that were subject of this audit.  Forest Tax Handbook, Private Forestry Handbook Chapter 10.-Training requirements for Cooperating Foresters. DNR collaborates with Wisconsin Woodland Owner Association and UW-Extension to offer meetings and field days to offer land owner training.  See also analysis of conformance to COC indicators for FMEs.
iii. A map or supporting documentation describing or showing the location of the member's forest properties;	C	Verified for all MFL properties visited in 2017 audit.
iv. Evidence of consent of all Group members;	C	
v. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems);	C	Verified for all MFL properties visited in 2018 audit. See closure of Obs 2017.2.
vi. Records demonstrating the implementation of any internal control or monitoring systems. Such records shall include records of internal inspections, non-compliances identified in such inspections, actions taken to correct any such non-compliance;	C	MFL 2016 Internal Audit Report Forest Tax Handbook Chapter 21

viii. Records of the estimated annual overall FSC production and annual FSC sales of the Group.	C	Forest Tax Handbook, Cutting Notice and Report See also analysis of conformance to COC indicators for FMEs.
5.2 Group records shall be retained for at least five (5) years.	C	Forest Tax Handbook Chapter 21
5.3 Group entities shall not issue any kind of certificates or declarations to their group members that could be confused with FSC certificates. Group member certificates may however be requested from the certification body.	C	No sub-certificates are issued.
<b>PART 2 GROUP FEATURES</b>		
<b>C6 Group Size</b>		
6.1 There is no restriction on the maximum size that a group certificate can cover in terms of number of group members, their individual forest property size or total forest area. The Group entity shall have sufficient human and technical resources to manage and control the Group in line with the requirements of this standard.  <i>NOTE: The number of Group members, their individual size and the total area will however influence the evaluation intensity applied by the certification body in their annual audits.</i>	C	Forest Tax Handbook Chapter 21
6.2 The Group entity shall specify in their procedures the maximum number of members that can be supported by the management system and the human and technical capacities of the Group entity.	C	Forest Tax Handbook Chapter 21
<b>C7 Multinational groups</b>		
7.1 Group schemes shall only be applied to national groups which are covered by the same Forest Stewardship Standard.	NA	Group members and group entity are all located within the boundaries of the State of Wisconsin, USA.
7.2 In cases where homogeneous conditions between countries/ regions may allow an effective and credible cross- border or multi-regional monitoring system, the Group entity shall request formal approval by FSC IC through their accredited Certification Body to allow certification of such a group scheme.	NA	Group members and group entity are all located within the boundaries of the State of Wisconsin, USA.
<b>PART 3 INTERNAL MONITORING</b>		
<b>C8 Monitoring requirements</b>		
8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following:	C	Forest Tax Handbook Chapter 21
i. Written description of the monitoring and control system;	C	Forest Tax Handbook Chapter 21



<p>ii. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with any additional requirements for membership of the Group.</p>	<p>C</p>	<p>Forest Tax Handbook Chapter 21 2016 MFL Internal Audit Report</p>
<p>8.2 The Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.</p> <p><i>NOTE: The Group entity may focus its monitoring during a particular annual surveillance evaluation on specific elements of the applicable Forest Stewardship Standard, with the provision that all aspects of the Forest Stewardship Standard are audited during the period of validity of the certificate.</i></p>	<p>C</p>	<p>Forest Tax Handbook Chapter 21 2018 MFL Internal Audit Report</p>
<p>8.3. The minimum sample to be visited annually for internal monitoring shall be determined as follows:</p> <p><i>NOTE: for the purpose of sampling, FMUs qualifying as SLIMF according to FSC-STD-01-003 V1-0 in connection with FSC-STD-01-003a, and managed by the same managerial body, may be combined into a 'resource management unit' (RMU) according to the proposal made in FSC-STD-20-007 Annex 1.</i></p> <p><i>SCS Guidance: This means that, for the purposes of internal monitoring, the group entity may base its sample on RMUs whether these are 'low intensity' or 'small' SLIMF. The CB applies different sampling rules to 'low intensity' SLIMF, though.</i></p>	<p>C</p>	<p>Forest Tax Handbook Chapter 21 2018 MFL Internal Audit Report</p>
<p><b>a) Type I Groups with mixed responsibilities (see section D Terms and definitions)</b></p> <p>Groups or sub-groups with mixed responsibilities shall apply a minimum sampling of <math>X = \sqrt{y}</math> for 'normal' FMUs and <math>X = 0.6 * \sqrt{y}</math> for FMUs &lt; 1,000 ha. Sampling shall be increased if HCVs are threatened or land tenure or use right disputes are pending within the group.</p>	<p>C</p>	<p>Forest Tax Handbook Chapter 21 2018 MFL Internal Audit Report</p>
<p><b>b) Type II Resource Manager Groups (see section D Terms and definitions)</b></p> <p>Group entities who also operate as resource managers may define the required internal sampling intensity at their own discretion for the forest properties they are managing, independent</p>	<p>NA</p>	

of their size and ownership (the minimum numbers as defined above do not apply here).		
8.4 For monitoring purposes the Group entity should use the same stratification into sets of 'like' FMUs as defined by the certification body in their evaluation. National SLIMF eligibility criteria should be considered.	C	This was not done for the 2018 internal audit which was used as a training exercise for the new Group Manager.
8.5 The Group entity should visit different members in their annual monitoring than the ones selected for evaluation by the certification body, unless pending corrective actions, complaints or risk factors are requiring a revisit of the same units.	C	2018 Internal Audit covered
8.6 In the selection process of members to be visited, the Group entity should include random selection techniques.	C	2018 Internal Audit used some random selection techniques.
8.7 The Group entity shall issue corrective action requests to address non-compliances identified during their visits and monitor their implementation.	C	2018 Internal Audit Report
8.8 Additional monitoring visits shall be scheduled when potential problems arise or the Group entity receives information from stakeholders about alleged violations of the FSC requirements by Group members.	C	Internal audit results communicated to Field Operations Team. Items that require policy decisions were sent to the Forestry Leadership Team.
<b>C9 Sales of forest products and use of the FSC trademark</b>		
9.1 The Group entity shall document and implement a system for tracking and tracing of forest products produced by the Group members which are supposed to be sold as FSC certified.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.
9.2 For the purpose of ensuring that non-certified material is not being mixed with FSC certified material, FSC products shall only be sold according to a sales protocol agreed by the Group members and the Group entity.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.
9.3 The Group entity shall ensure that all invoices for sales of FSC certified material are issued with the required information (see FSC-STD-40-004 V2-0 Clause 6.1.1) and are filed by the group members.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.
9.4 The Group entity shall ensure that all uses of the FSC Trademark are approved by the responsible certification body in advance.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.

## Group Management Program Members



Group member  
list-final.xlsx