

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

## *Wisconsin Department of Natural Resources County Forest Program*

### **SCS-FM/COC-00083G**

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<https://dnr.wi.gov/topic/CountyForests/>

CERTIFIED	EXPIRATION
22 December 2019	21 December 2024

DATE OF FIELD EVALUATION

6 - 9 August 2019

DATE OF REPORT FINALIZATION

19 November 2019

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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.

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## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Certificate Registration Information

##### Name and Contact Information

<b>Organization name</b>	Wisconsin Department of Natural Resources – County Forest Program		
<b>Contact person</b>	Douglas Brown		
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##### FSC Sales Information

<b>FSC salesperson</b>	Sabina Dhungana, Forest Products Services Specialist		
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		<b>Website</b>	<a href="http://www.dnr.wi.gov">http://www.dnr.wi.gov</a>

##### Scope of Certificate

<b>Certificate Type</b>	<input type="checkbox"/> Single FMU		<input checked="" type="checkbox"/> Multiple FMU	
	<input type="checkbox"/> Group			
<b>SLIMF (if applicable)</b>	<input type="checkbox"/> Small SLIMF certificate		<input type="checkbox"/> Low intensity SLIMF certificate	
	<input type="checkbox"/> Group SLIMF certificate			
<b># Group Members (if applicable)</b>				
<b>Number of FMUs in scope of certificate</b>	21			
<b>Geographic location of non-SLIMF FMU(s)</b>	<i>Latitude &amp; Longitude:</i>			
<b>Forest zone</b>	<input type="checkbox"/> Boreal		<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical		<input type="checkbox"/> Tropical	
<b>Total forest area in scope of certificate which is:</b>				<b>Units:</b> <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
privately managed			0	
state managed			0	
community managed			1,778,491.22	
<b>Number of FMUs in scope that are:</b>				
less than 100 ha in area	0	100 - 1000 ha in area	0	
1000 - 10 000 ha in area	4	more than 10 000 ha in area	17	

<b>Total forest area in scope of certificate which is included in FMUs that:</b>		<b>Units:</b> <input type="checkbox"/> ha or <input type="checkbox"/> ac
are less than 100 ha in area	0	
are between 100 ha and 1000 ha in area	0	
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0	
<b>Division of FMUs into manageable units:</b>		
Each FMU is an individual county forests, which is further subdivided into compartments and stands.		

**Non-SLIMF FMUs (Group or Multiple FMU Certificates )**

Name	Contact information	Latitude/ longitude of Non-SLIMF FMUs	
NA*	NA	NA	NA

\* All FSC-certified FMUs are non-SLIMF. Vernon County is less than the 1,000-hectare size threshold for SLIMF, but it is not certified.

**Social Information**

<b>Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):</b>		
Male workers: 1,781	Female workers: 82	
<b>Number of accidents in forest work since previous evaluation:</b>	Serious: 1	Fatal: 0

**Pesticide and Other Chemical Use\***

<input type="checkbox"/> FME does not use pesticides.					
County	Commercial name of pesticide / herbicide	Active ingredient	Quantity applied since previous evaluation (kg or lbs.)	Total area treated since previous evaluation (ha or ac)	Reason for use
Ashland	Garlon 4 Ultra, Accord XRT, DuPont Oust	Triclopyr, Glyphosate, Sulfometurom methyl	79.5 qts, 148 qts, 67 oz.	67 Acres	Invasive control, opening maintenance
Barron	Garlon	Triclopyr	4 % Solution	25 Acres	Control Buckthorn
Bayfield	Chopper	Imazapyr	27 gallons	203 acres	Site prep for planting red pine or seeding jack pine
	Accord XRT	Glyphosate	141 gallons	276 acres	Site prep for planting red pine or seeding jack pine

	Forestry Garlon XRT	Triclopyr	12 gallons	54 acres	Site prep for planting red pine or seeding jack pine
	Oust Extra	Sulfometuron methyl	12 pounds	184 acres	Site prep for planting red pine or seeding jack pine
	Transline	Clopyralid	16 ounces	20 acres	Black Locust control
	Garlon 4	Triclopyr	1.35 gallons	31 acres	Buckthorn control
	Garlon 4	Triclopyr	1.5 Gallons	0.2 acres	Oak Wilt Treatments
	Milestone	Aminopyralid	2.6 gallons	238 acres	Knapweed control
Chippewa	Garlon 4 Ultra	Triclopyr (Triethylamine Salt)	185 oz	14.5 acres	White Pine and Hemlock release
	Triclopyr	Triethylamine Salt	3.8 oz	spot treat across 90 acres	Garlic Mustard Suppression
	Oust XP	Sulfometuron Methyl	0.1 oz	spot treat across 90 acres	Garlic Mustard Suppression
Clark	<i>Garlon 4 Ultra</i>	Triclopyr	79.88 gallons	56.9 acres & Spot Treatments	Basal Bark Oak Release & Invasive Control
	<i>Roundup Custom</i>	Glyphosate	17.1 gallons	33	Pine Release
	<i>Escort XP</i>	Metsulfuron methyl	0.62 ounces	Spot Treatments	Invasive Control
	<i>Garlon 4</i>	Triclopyr	6 gallons	33	Pine Release
	<i>Transline</i>	Clopyralid	7.92 ounces	Spot Treatments	Invasive Control
	<i>Milestone</i>	Aminopyralid	10 ounces	Spot Treatments	Invasive Control

	<i>Tordon K</i>	Picloram	12.38 ounces	Spot Treatments	Invasive Control
	<i>Oust XP</i>	Sufometuron methyl	4 ounces	Spot Treatments	Invasive Control
	<i>Plateau</i>	Ammonium salt of imazapic	24 ounces	Spot Treatments	Invasive Control
	<i>Activator 90</i> Surfactant	Surfactant	1.25 gallons	33	Pine Release
	<i>Preference</i> Surfactant	Surfactant	18.55 gallons	Spot Treatments	Invasives
Douglas	Rodeo	Glyphosate	Less than 2 oz. (15% mix rate)	120 square feet	Invasive vegetation management on creek shoreline
Eau Claire	None	NA	NA	NA	NA
Florence	Element 4, Bark Oil Blue	triclopyr, petroleum Distillates	1 gallon, 3 gallons	5-7 acres	Oak wilt control
Forest	None	NA	NA	NA	NA
Iron	None	NA	NA	NA	NA
Jackson	Garlon	Triclopyr	110.7 Quarts	296	Glossy Buckthorn
	Roundup	Glyphosate	23 Quarts	31	Glossy Buckthorn/weed control
	Milestone	Aminopyralid	32 Ounces	13	Spotted Knapweed
Juneau	None	NA	NA	NA	NA
Lincoln	Cornerstone Plus	Glyphosate	3% Solution	5 acres	Buckthorn
	Element 4	Triclopyr	2% Solution	25 acres	Garlic Mustard

	Oust	Sulforeturon methyl	1 oz./acre	25 acres	Garlic Mustard
	2,4-D	Dimethylamine salt of 2,4-D	2% Solution	1 acre	Crown Fetch
Oconto	Cellutreat	disodium Octaborate Tetrahydrate	175 pounds	247 acre	HRD
	Polaris A/C Complete	isopropylamine salt of imazapyr	11.5 Gallons	1.77 acres	Phragmites
	Round-up	18% Glyphosate/0.73% Diquat Dibromide	24 Oz (mixed into 4 gallons)	under 1 acre	Ornamental Bittersweet
	Garlon 3A	Triclopyr	19.375 Quarts	12.866 acres	Vegetation Maintenance on transmission Line Corridor
	Escort XP	Metsulfuron Methyl	9.55 ounces	12.866 acres	Vegetation Maintenance on transmission Line Corridor
Oneida	Garlon 4 Ultra 62719-1552	Triclopyr	0.09 lb	~0.1 ac	Garlic Mustard Control
	Oust 432-1552	Sulfameteron Methyl	0.0075 lb	~0.1 ac	Garlic Mustard Control
	Milestone 62719-519	Aminopyralid	0.03 lb	~1.0 ac	Canada Thistle and Spotted Knapweed Control
Price	Glystar	Glyphosate	2.5% solution	8.5 acres	Wildlife opening maintenance, buckthorn and park maintenance
Sawyer	Garlon 4 Ultra	Triclopyr	2 gallons	5 acres	Oak wilt girdle/stump treatment
Taylor	None	NA	NA	NA	NA



Vilas	Chopper / Accord XRT II / Oust XP	Imazapyr/Glyphosate/Sulfometuron Methyl	4.75 gal. / 14.25 gal. /38 oz.	38-acres / 38-acres / 38-acres	Forestry Site Preparation - control competition
Washburn	Accord / Garlon	Glyphosate / Triclopyr butoxyethyl ester	151.2 quarts / 100.8 quarts (active)	100.8 Acres	Site prep for planting, including buckthorn control
	Garlon	Triclopyr butoxyethyl ester	2 quarts	2 acres	basal treatment for buckthorn
Wood	None	NA	NA	NA	NA

\* Note: Glyphosate, picloram, disodium octaborate tetrahydrate, and isopropylamine are classified as 'Restricted' and diquat dibromide is classified as 'Highly Restricted' under FSC-POL-30-001a. Under the new Pesticide Policy (FSC-POL-30-001 V3-0), by 1 August 2020 the FME will need to complete an environmental and social risk assessment (ESRA) in accordance with this policy.

### Production Forests

<b>Timber Forest Products</b>	<b>Units:</b> <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	1,418,687
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	138,633
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	1,336,421
<b>Silvicultural system(s)</b>	<b>Area under type of management</b>
Even-aged management	
Clearcut (clearcut size range 0.1-212 acre; 17.3 average)	161,137
Shelterwood	195,978
Other: coppice, seed-tree	668,188
Uneven-aged management	
Individual tree selection	230,838
Group selection	75,240
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
<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	0

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	0  The volume of sphagnum moss and Christmas trees harvested from the FMUs are tracked, but they are not sold as certified.
<b>Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name)</b>	
Aspen/Poplar ( <i>Populus tremuloides</i> , <i>Populus grandidentata</i> ), Balsam poplar ( <i>Populus balsamifera</i> ), Eastern Cottonwood ( <i>Populus deltoides</i> ), Swamp white oak ( <i>Quercus bicolor</i> ), Silver maple ( <i>Acer saccharinum</i> ), American elm ( <i>Ulmus Americana</i> ), River birch ( <i>Betula nigra</i> ), Green ash ( <i>Fraxinus pennsylvanica</i> ), White oak ( <i>Quercus alba</i> ), Bur oak ( <i>Quercus macrocarpa</i> ), Black oak ( <i>Quercus velutina</i> ), Northern pin oak ( <i>Quercus ellipsoidalis</i> ), Black walnut ( <i>Juglans nigra</i> ), Butternut ( <i>Juglans cinerea</i> ), Shagbark hickory ( <i>Carya ovata</i> ), Bitternut hickory ( <i>Carya cordiformis</i> ), Black cherry ( <i>Prunus serotina</i> ), Red maple ( <i>Acer rubrum</i> ), Hackberry ( <i>Celtis occidentalis</i> ), Balsam fir ( <i>Abies balsamea</i> ), Eastern hemlock ( <i>Tsuga canadensis</i> ), Scotch pine ( <i>Pinus sylvestris</i> ), European larch ( <i>Larix decidua</i> ), Norway spruce ( <i>Picea abies</i> ), Eastern red cedar ( <i>Juniperus virginiana</i> ), Blue spruce ( <i>Picea pungens</i> ), Norway maple ( <i>Acer platanoides</i> ), Boxelder ( <i>Acer negundo</i> ), Black locust ( <i>Robinia pseudoacacia</i> ), Honey locust ( <i>Gleditsia triacanthos</i> ), Eastern Hophornbeam/Ironwood ( <i>Ostrya virginiana</i> ), Musclewood/Blue beech ( <i>Carpinus caroliniana</i> ), Sugar maple ( <i>Acer saccharum</i> ), Yellow birch ( <i>Betula alleghaniensis</i> ), White ash ( <i>Fraxinus americana</i> ), American beech ( <i>Fagus grandifolia</i> ), American basswood ( <i>Tilia americana</i> ), White birch ( <i>Betula papyrifera</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> ), and Northern white cedar ( <i>Thuja occidentalis</i> )	

**FSC Product Classification\***

Timber products		
Product Level 1	Product Level 2	Species
	W1.1 Roundwood (logs/pulp)	All species listed above.
	W1.2 Fuel Wood	
W3 Wood in chips or particles	W3.1 Wood chips	
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
NA	NA	NA

\*Note: W1, W2, and W3 product groups usually do not require a separate evaluation to FSC-STD-40-004 (COC) if processing occurs in the field for FM/COC and CW/FM certificate types. N1-N10 (NTFPs) are eligible to be sold with FSC claims under FM/COC certification if reported here. Bamboo and NTFPs derived from trees (e.g. cork, resin, bark) may be eligible for FM/COC and CW/FM certification. NTFPs used for food and medicinal purposes are not eligible for CW/FM certification. Check with SCS if you have any products intended to be sold with an FSC claim outside of any of these categories.

### Conservation and High Conservation Value Areas

Conservation Area	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
<b>Total amount</b> of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	56,367

*\*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.*

High Conservation Value Forest / Areas			Units: <input type="checkbox"/> ha or <input checked="" 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).	assorted bogs, wetland communities, fens, kettle lakes, and other areas containing significant biodiversity values (including endangered & threatened species); located in 13 counties	31,586
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.	Upper Nemadji River Floodplain Forest (Douglas County); Brazeau Cedar Swamp (Oconto County); Penokee Range Hardwood (Iron County); Silent Wood Benchmark Forest (Washburn County)	5,112
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Pine barrens (Eau Claire, Clark, Douglas, & Jackson Counties); old growth/pine relics (Forest, Juneau, Sawyer & Taylor Counties); oak savanna (Washburn County); Enterprise Hemlocks, Noisy Creek Cedars & Gobbler Lake SNA (Oneida County)	4,163
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Winx Flowage (Clark County)	320

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).	Burial Mounds (Oconto County)	5
<b>Total area of forest classified as 'High Conservation Value Forest / Area'</b>			41,186

**Areas Outside of the Scope of Certification (Partial Certification and Excision)**

<input type="checkbox"/> <i>N/A – All forestland owned or managed by the applicant is included in the scope.</i>		
<input checked="" type="checkbox"/> <i>Applicant owns and/or manages other FMUs not under evaluation.</i>		
<input type="checkbox"/> <i>Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.</i>		
<b>Note:</b> <i>Excision cannot be applied to CW/FM certificates.</i>		
<b>Explanation for exclusion of FMUs and/or excision:</b>	29 county forests exist in Wisconsin. 21 of them have chosen to commit to FSC certification (Vilas and Oneida joined spring 2017). There are an additional 6 counties that are SFI certified, and 2 are not certified under any forest certification program. Within each county, there may be forestlands that are outside of the scope for other reasons, such as being inaccessible to forest management for timber production.	
<b>Control measures to prevent mixing of certified and non-certified product (C8.3):</b>	Each FMU has its own log or haul tickets that include the appropriate certificate codes as applicable. Non-certified FMUs are not permitted to use any certificate codes. Forest areas outside of the scope within certified counties typically are not managed through timber harvests.	
<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>
see Wisconsin County Forest FMU Summary table below	scattered across Wisconsin	~750,000 acres; includes SFI-only counties, non-certified counties, and non-certified areas in FSC counties  Total acreages: FSC            1,778,491.22 SFI            2,216,890.02 Non-certified 24,698

**Wisconsin County Forest FMU Summary**

Public Identifier for Group Member*	Location & Coordinates		Forest Area (ac)	Area by Management Type (Private, State, Community)	Main Products	Year(s) Evaluated
Large FMUs (>10,000 ha)						
Ashland	46° 12' 45" N	-90° 28' 56" W	40,305.19	Community	Fiber/Logs	Since 2005
Bayfield	46° 47' 12" N	-90° 58' 52" W	172,020.87	Community	Fiber/Logs	Since 2005
Chippewa	45° 11' 50" N	-91° 14' 53" W	34,653.84	Community	Fiber/Logs	Since 2005
Clark	44° 35' 54" N	-90° 47' 46" W	134,672.26	Community	Fiber/Logs	Since 2005
Douglas	46° 17' 39" N	-92° 0' 7" W	280,066.27	Community	Fiber/Logs	Since 2005
Eau Claire	44° 45' 9" N	-91° 2' 7" W	52,670.71	Community	Fiber/Logs	Since 2005
Florence	45° 46' 53" N	-88° 15' 4" W	36,394.80	Community	Fiber/Logs	Since 2005
Iron	46° 17' 45" N	-90° 13' 48" W	175,308.42	Community	Fiber/Logs	Since 2005
Jackson	44° 20' 57" N	-90° 32' 6" W	122,450.16	Community	Fiber/Logs	Since 2005
Lincoln	45° 22' 57" N	-89° 50' 45" W	100,843.05	Community	Fiber/Logs	Since 2005
Oconto	45° 2' 24" N	-88° 16' 40" W	43,705.83	Community	Fiber/Logs	Since 2005
Oneida	45° 35' 24" N	-89° 37' 1" W	82,399.15	Community	Fiber/Logs	Since 2018
Price	45° 34' 9" N	-90° 23' 54" W	92,302.45	Community	Fiber/Logs	Since 2005
Sawyer	45° 42' 43" N	-91° 3' 9" W	115,196.50	Community	Fiber/Logs	Since 2005
Vilas	46° 2' 8" N	-89° 17' 19" W	41,141.41	Community	Fiber/Logs	Since 2017
Washburn	45° 57' 3" N	-91° 44' 54" W	149,956.03	Community	Fiber/Logs	Since 2005

Wood	44° 22' 45" N	-90° 6' 2" W	37,826.21	Community	Fiber/Logs	Since 2005
Medium FMUs (>1,000 – 10,000 ha)						
Barron	45° 37' 16" N	-91° 52' 6" W	16,264.69	Community	Fiber/Logs	Since 2005
Forest	45° 31' 52" N	-88° 52' 26" W	14,826.67	Community	Fiber/Logs	Since 2005
Juneau	44° 1' 2" N	-90° 8' 14" W	17,798.79	Community	Fiber/Logs	Since 2005
Taylor	45° 19' 15" N	-90° 3' 47" W	17,687.92	Community	Fiber/Logs	Since 2005
SLIMF FMUs (100 – 1,000 ha)						
NA	NA	NA	NA	NA	NA	NA
SLIMF FMUs (<100 ha)						
NA	NA	NA	NA	NA	NA	NA

## 1.2 Standards Applicable

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 applicable <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, 8 July 2010)
	<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 type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

## 1.3 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
<b>Area Conversion Factors</b>		
<b>To convert from</b>	<b>To</b>	<b>multiply by</b>
Square foot (sq. ft.)	Square meter (m <sup>2</sup> )	0.09290304
Acre (ac)	Hectare (ha)	0.4047
<b>Volume Conversion Factors</b>		
<b>To convert from</b>	<b>To</b>	<b>multiply by</b>
Cubic foot (cu ft.)	Cubic meter (m <sup>3</sup> )	0.02831685
Gallon (gal)	Liter (l)	4.546
<b>Quick reference</b>		
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>	<p>Endangered Species Act                  Clean Water Act (Section 404 wetland protection)                  Occupational Safety and Health Act                  National Historic Preservation Act                  Archaeological and Historic Preservation Act                  Americans with Disabilities Act                  U.S. ratified treaties, including CITES                  Lacey Act                  Forest Resources Conservation and Shortage Relief Act                  National Resource Protection Act                  National Environmental Protection Act                  National Wild and Scenic River Act                  Native American Grave Protection and Repatriation Act                  Rehabilitation Act                  Architectural Barriers Act</p>
<p><b>Pertinent regulations at the state/local level</b></p>	<p>Statutory authority to engage in forest certification (broadly interpreted):                  §§<a href="#">23.11</a>, <a href="#">28.01</a>, <a href="#">28.07</a>, and <a href="#">77.80</a>                  The County Forest Law (s 28.11 Wis. Stats.)                  DNR <a href="#">Manual Codes</a> and <a href="#">Handbooks</a>                  Wisconsin Pesticide Law (<a href="#">Chapter 94, WI Statutes</a>)                  Use of Pesticides on Land and Water Areas of the State of Wisconsin (<a href="#">WI Administrative Code, Chapter NR 80</a>)                  Wild Animals and Plants Law (<a href="#">Chapter 29, WI Statutes</a>) and <a href="#">WI Administrative Code NR 10</a>                  Wisconsin Water Law: <a href="#">UW Booklet</a>                  Wisconsin Groundwater Law (<a href="#">Chapter 160, WI Statutes</a>)                  Navigable Waters (<a href="#">Chapter 30, WI Statutes</a>)                  Water Quality Standards for Wetlands (Chapter <a href="#">NR 103, WI Administrative Code</a>)                  Wisconsin Shoreland Management Program (Chapter <a href="#">NR 115, WI Administrative Code</a>)                  Endangered and Threatened Species (<a href="#">Chapter NR 27, WI Administrative Code</a>)  <a href="#">Wisconsin Historic Preservation Laws</a></p>
<p><b>Regulatory context description</b></p>	<p>A description of the role of DNR liaison foresters working with County Forests can be found in the resource titled <i>WDNR Public Forest Lands Handbook 24605</i>. Their primary involvement, as required by statute, is assistance in long-term and annual planning, delivery of technical assistance, and county forest timber sale approvals.</p>



	<p>The following is adapted from previous reports.</p> <p><i>In 1967, the Wisconsin Legislature created the Department of Natural Resources. The Department coordinates the preservation, protection and regulate on of the natural environment for the benefit of the people of this state and its visitors. Included in its responsibilities are water and air quality protection, water supply regulations, solid and hazardous waste management, contamination cleanup, protecting biodiversity, fish and wildlife management, forest management and protection, providing parks and outdoor recreation opportunities, lake management, wetland, shore-land and floodplain protection, and law enforcement.</i></p> <p><i>The mission statement and the purpose and direction of the County Forest Law as stated in s. 28.11, Wis. Stats:</i></p> <p><i>“...to provide the basis for a permanent program of county forests and to enable and encourage the planned development and management of the County Forests for optimum production of forest products together with recreational opportunities, wildlife, watershed protection and stabilization of stream flow, giving full recognition to the concept of multiple use to assure maximum public benefits; to protect the public rights, interests and investments in such lands; and to compensate the counties for the public uses, benefits and privileges these lands provide; all in a manner which will provide a reasonable revenue to the towns in which such lands lie.”</i></p>
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**2.1.2 Environmental Context**

<b>Environmental safeguards:</b>
<p>The Wisconsin Natural Heritage Inventory (NHI) is consulted prior to forest management activities. Foresters work in consultation with DNR Wildlife and Natural Heritage Conservation (NHC) staff to address any occurrences. Forestry, Wildlife, and NHC staff often conduct additional site surveys for species if the NHI database indicates the need. The NHI system allows for reporting of any additional occurrences by a variety of staff. Impacts to RTE species are documented in timber sale files and the timber sale cutting notice. County staff cooperate and collaborate with Wisconsin DNR staff on upcoming timber sales during the Annual Interdisciplinary Meeting held at the regional level to receive additional input on RTE species detection and management.</p>
<b>Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:</b>
<p>Management activities are planned and carried out with consultation from Wildlife and/or NHC staff. Using species specific guidelines applied to local conditions, mitigations to potential impacts to RTE species and habitats are implemented. DNR has guidance for RTE species in terms of nest buffer areas and timing of harvest. There is a regional Habitat Conservation Plan (HCP) that guides mitigations for some species such as the Karner blue butterfly.</p>

### 2.1.3 Socioeconomic Context

(Adapted from previous reports)

The following paragraphs describing the Socio-economic context for the Wisconsin County Forest Program are excerpts from the *County Forest Comprehensive Land Use Plan- Environmental Assessment*.

Social/Economic (including ethnic and cultural groups)

*Forest industry and tourism, the two primary business sectors impacted by the County Forests, are crucial to Wisconsin. There are over 1800 forest products companies in the State. Forest industry is the largest employer in 28 Wisconsin counties and in the top three of 14 more counties. Over 327 million cubic feet of wood are used in Wisconsin annually. We currently harvest 332 million cubic feet and are the only midwest State that harvests more than they consume. Counties with County Forests are typically more rural, less populated, and have relatively few urbanized areas. The racial makeup of these rural counties is over 90% Caucasian. Incomes are generally less than statewide averages although the more populous counties with County Forests (e.g. Marathon, Eau Claire) approach the norm. The presence of public land and the recreational opportunities it offers are often mentioned as contributing to the appeal of residing in these counties.*

Archaeological/Historical

*Prehistoric human occupation has been documented back to the late Pleistocene era during the retreat of the last glacial ice cover. Numerous cultures have existed in the State over the past 11,000 years. In more recent history, the first signs of a shift from nomadic hunting to a more sedentary lifestyle appeared in 1500 BC to 500 BC. These Indian cultures grew agricultural crops and many also harvested wild rice. From 500 BC to 1000 AD there was an emphasis on agriculture. Many cultural artifacts come from that period. Indian cultures, including the Hopewell Indians, were skillful artisans that created ceremonial objects and textiles. Effigy mound culture left behind numerous ceremonial mounds formed as various animals and shapes. Many of these are still visible today, particularly in southwestern Wisconsin. From 1000 AD to 1600 AD Indian cultures typically set up villages along rivers or wetlands. By 1630, three tribes were residing in Wisconsin. The Winnebago (Ho-Chunk) lived between Green Bay and Lake Winnebago. The Menominee lived along the Menominee River (west of Green Bay). The Santee Dakota inhabited northwest Wisconsin. The first Europeans were arriving in Wisconsin in the form of French fur traders. Tribal wars in the eastern US during this time period resulted in many tribes relocating to Wisconsin. By 1820 overexploitation of northern Wisconsin furbearers caused the fur trade to shift north into Canada. The federal government purchased / bartered Wisconsin lands from tribes by the mid 1800's. Treaties from this era resulted in considerable controversy in the late 1980's and resulted in the retention of many hunting and gathering rights by Chippewa tribes on what are now County Forests. By the middle of the 19th century, reservations housed the bulk of Wisconsin's Native American population. Six major tribes still reside in Wisconsin today, the Ojibwe (Chippewa), Stockbridge-Munsee (Mohican), Oneida, Menominee, Potawatomi, and Ho-Chunk (Winnebago).*

*Timber and timber-related occupations employed much of the workforce between 1850 and 1920. Agricultural capabilities in northern Wisconsin were promoted late in the 19th century to encourage settlement. In addition, copper and iron ore mining attracted Cornish and Finnish people to the northern third of Wisconsin. Nutrient-poor sandy soils with short growing seasons were not hospitable for traditional row crop farming. These northern farms were generally isolated from one another and were sometimes owned by settlers with little or no farming experience. These isolated settlers were a burden on local services and resulted in some of the first zoning regulations in the State. Lands became tax delinquent and resulted in the creation of the State and County Forest programs in the late 1920's. Twenty-five of the twenty-nine county forests enrolled in the first ten years of the program.*

*Archaeological or cultural resource locations are confidential and exempt from Freedom of Information Act disclosure so a map of site locations is not provided for review. Cultural records on the State Historical Society database are reviewed for timber sales and other land disturbing activities on the County Forests. See also the individual County Forest Plans for information on local cultural resources.*

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

(Adapted from previous reports)

*County Forest Comprehensive Land Use Plan 2005 reports "the National Hierarchical Framework of Ecological Units (NHFEU) categorizes Wisconsin into two provinces, the Laurentian Mixed Forest (212) forming the northern half of the State and the Eastern Broadleaf Forest (222). Within each province are sections, subsections and landtype associations that further group land into areas with similar geology, soil types, surface water features, wetlands and historic and potential plant communities."*

The following paragraphs describing the Socio-economic context for the Wisconsin County Forest Program are excerpts from the *County Forest Comprehensive Land Use Plan- Environmental Assessment*.

*Land use (dominant features and uses including zoning if applicable) The State of Wisconsin is comprised of nearly 35 million acres of which 16 million, or 46%, are forested. Public agencies own and manage nearly 16% of all land, and 29% of the forested acreage in Wisconsin. Nearly 7% of the total land base and 15% of the forested land in Wisconsin is in the County Forest program. Land use in the State varies widely, but less so in those 29 counties containing County Forests. Forestry and recreation are the primary two land uses on the County Forests. When ranked by industrial output, forest industry is the #1, #2, or #3 ranked industry in 16 of the 29 counties. Management for forestry purposes is rooted in the County Forest statute (s. 28.11, Wis. Stats) and has been consistent for a number of years. The County Forests are managed actively but sustainably, and continue to grow more trees than they harvest (see Proposed Physical Changes section, #4). Land use adjacent to the County Forests is primarily forestry and tourism-based in the north. Primary residences are much fewer than in the south but seasonal dwellings are common. Agriculture is secondary in the north although it is of greater importance in the northwest. Incorporated cities and towns are relatively scarce in comparison to the southern half of Wisconsin. Central Wisconsin has a higher permanent population with more urban areas, manufacturing and agriculture. Agriculture tends to be a primary land use in southwestern Wisconsin.*

*Recreational use of the County Forests has experienced far more change over the last several years. From 1993 to 2004 traveler spending increased 155% in those counties with County Forests. This compares to a 114% increase for other Wisconsin counties over that same time frame. This highlights the increased recreational interest in forest-based activities. Forests are more in demand for a variety of uses. The more urbanized areas of Wisconsin rely heavily on the County Forests and other public lands for recreation. Activities such as roller skiing, disc golf, mountain biking, geo-caching and horseback riding were of little consequence 10-15 years ago. Motorized recreation has become more popular, primarily as it relates to all-terrain vehicle (ATV) use. There are now more than 200,000 ATVs registered in Wisconsin. Another 10,000 to 15,000 ATVs are sold annually. The number of registered ATVs now exceeds that of snowmobiles and their use on public land is much more controversial. The fact remains that ATVing is a popular recreational activity and the public needs, and at times demands, an opportunity to ride on public lands such as the County Forests. County Forests currently provide approximately 1180 miles of designated ATV trail. This is over 25% of the State-funded total. Additional opportunities on town road routes (connectors) are available. Some Forest policies allow for use on undesignated trails as well.*

## 2.2 Forest Management Plan

<p><b>Management objectives:</b></p> <p>WCFP management plans are complemented by the <i>Wisconsin Forest Management Guidelines (WFMG)</i>, published by DNR and revised in 2018. This document presents a history of forest conditions and natural disturbance regimes. Objectives are clearly presented in WCFP plans, and future conditions and activities are presented in WisFIRS models, AWP, and planning meeting minutes. There is some variation among plans in the presentation of desired future conditions.</p>
<p><b>Forest composition and rationale for species selection:</b></p> <p>As explained in the <i>WDNR Silviculture Handbook</i>, the Wisconsin Forest Habitat Type Classification System divides the state into at least 11 habitat type regions to facilitate habitat type identification and interpretation. Northern habitats type groups are based on local conditions and vary from “Very Dry to Dry (VD-D) and nutrient poor” to “Wet-mesic to Wet.” Southern habitats type groups range from “Dry (D) and nutrient poor to medium” to “Wet-mesic to Wet (WM-W)” (pages 11-6 to 11-8). Cover types varies accordingly based on these local conditions; Wisconsin’s cover types include White Pine, Red Pine, Jack Pine, Fir-Spruce, Swamp Conifer-Balsam Fir, Black Spruce, Tamarack, White Cedar, Hemlock Hardwood, Northern Hardwood, Oak, Aspen, Paper Birch, Black Walnut, Swamp Hardwood, Bottomland Hardwood, Red Maple, and Central Hardwoods,</p> <p>Species selection, as described in the <i>WDNR Silviculture Handbook</i>, is based on “growth rate, site requirements, climatic suitability, genetic variability, wood and fiber properties, aesthetics, wildlife value, biological diversity, erosion control and potential insect and disease problems” (page 22-7). When reforesting a harvested area, “[s]pecies selection should be based on: ecological acceptability; production goals; silvicultural system; forest health; and local experience” (page 22-8).</p>
<p><b>General description of land management system(s):</b></p>

General references are contained in county plans. The *WDNR Silviculture Handbook* is the primary reference for this element of the plan. Specific silviculture plans are part of Form 2460 and discussed in AWP.

The degree to which harvest rate calculations presented in county plans varies among counties, but the *Public Forest Lands Handbook* is the primary reference for harvest rate calculations. Species selection for harvest is a product of annual updates from forest recon and the programming of the WisFIRS system.

**Harvest methods and equipment used:**

Although there are general descriptions of harvesting equipment in WFMG, specific requirements for machinery or special provisions for harvesting are included in prescriptions for each harvest and described on Form 2460. Most harvesting on WCFP is done with processors and forwarders, generally considered to have minimal impacts on resources.

**Explanation of the management structures:**

WCFP employs several documents to guide management. There are three levels of documentation that comprise the Forest Management Plan (FMP):

DNR liaison:

- WDNR Public Forest Lands Handbook 2460.5
- WDNR Timber Sale Handbook 2461
- WDNR Silviculture Handbook
- Wisconsin Forest Management Guidelines (WFMG)
- BMP manuals
- Timber Sale Cutting Notice & Report - Form 2460

Wisconsin County Forests Association (WCFA)

- Strategic Plan (2016)
- Documentation and training programs to support the Strategic Plan

Individual Counties:

- Comprehensive Land Use Plans (CLUP or county plan)
- Annual Work Plans (AWP)
- Partnership meeting minutes
- Timber Sale Contracts
- Timber Sale Cutting Notice & Report - Form 2460

## 2.3 Monitoring System

**Growth and yield of all forest products harvested:**

WisFIRS is a comprehensive system for guiding the reconnaissance and inventory of forest compartments as well as for scheduling harvest and other management options of stands. Growth and

yield information is included in compartment reconnaissance (WDNR Public Forest Lands Handbook 2460.5).

The harvest for 2018 was 696,662 cords of pulpwood and 22,984 MBF of sawlogs on 37,490 acres. Records are kept of harvested timber and then entered into WisFIRS before annual updates on harvest scheduling. Records for harvest of firewood and other NTFPs are maintained, although there are no NTFPs that are FSC certified, as well as for any products harvested by members of tribes.

**Forest dynamics and changes in composition of flora and fauna:**

Most of this data are collected and maintained by personnel with Bureaus of Wildlife and Natural Heritage Conservation. Results of such monitoring are made available to county forest managers during periodic meetings of interdisciplinary teams and/or during review of proposed management operations.

Wildlife surveys include nesting bird surveys, grouse transects, summer deer observations, winter track surveys, bear surveys, and a variety of other wildlife and plant monitoring. Forest health monitoring includes gypsy moth, EAB surveys, and other invasive species monitoring.

**Environmental impacts:**

County and DNR foresters indicated that they visit active harvest operations several times a week; assessment forms are in writing and were inspected during the field audit (attached to timber sale documentation). BMP monitoring for water quality, soil disturbance monitoring, and vernal pond monitoring are reported by county foresters to the administrator for each county.

WCFP requires annual reports and annual work plans for each county. AWP routinely include information on the system of forest roads and make annual requests for road improvements and maintenance. The Wisconsin’s Forest Practices Study (WFPS) includes information on roads in its examination of the impacts of Wisconsin’s forestry practices.

**Social impacts:**

See County Forest Comprehensive Land Use Plans. Additional monitoring information is available through WCFA and WDNR. WCFA has sponsored a forestry practices study that covered the information required in this indicator for long-term socioeconomic impacts.

Meeting minutes with the public and Citizen Advisory Councils serve as a record of stakeholder interaction. Communication with tribal representatives is ongoing, assuring that any opportunities for joint monitoring of cultural sites are made available to tribes.

**Costs, productivity, and efficiency:**

County Forestry Committees and County Boards develop budgets annually. WCFP administrators can provide any documentation of Department budgets that is requested. WisFIRS can generate reports on stumpage value for sales completed by year.

Quarterly and annual accomplishment reports show progress throughout the year for various work goals (timber sale establishment, reforestation, etc.). Timber sale inspections serve to monitor at the sale level. WisFIRS can be used to generate reports on revenue from timber sales for a given time period.

### 3. Certification Evaluation Process

#### 3.1 Evaluation Schedule and Team

##### 3.1.1 Evaluation Itinerary and Activities

<b>Date:</b> 6 August 2019	
<b>Auditors:</b> Mike Ferrucci, Stefan Bergmann, and Shannon Wilks	
<b>FMU / location / sites visited</b>	<b>Activities / notes</b>
DNR office, Ashland, Wisconsin Program-wide Opening Meeting	Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and review of open CARs/OBS, emergency and security procedures for evaluation team, reviewed audit itinerary.

<b>Date:</b> 6 August 2019 (Cont.)	
<b>FMU:</b> Barron County Forest	
<b>Auditor:</b> Mike Ferrucci	
<b>Location/ sites visited</b>	<b>Activities / notes</b>
Drive from Ashland to Barron County	Topics discussed: overview of FMU's forest and land management programs; review of training; discussion of procedures; and review of site selections.
Site 1: Recreation site (lunch location)	Roadside picnic and fishing area at small pond. The site is well-designed and maintained.
Site 2: Goose Lake Access Road	Permanent county forest access road with gate, which is locked during deer hunting season and at other times when conditions are wet. Road is located at top of an esker that winds past and close to several kettle ponds and wetland depressions. Drainage provisions are generally working well, although more gravel is needed in places to fill wheel ruts and create a crowned profile. No resource damage is apparent, despite an extended period of rainfall amounts well above average and a major rainstorm the previous day.
Site 3: Upgraded logging access spur road from Goose Lake Access Road	Road improvements that do not meet BMPs and WDNR's expectations for repairs by timber buyer; the buyer's road contractor brushed out and regraded an existing access road spur as a result. The road was cut below grade and through hills without providing relief options for water accumulation. The sale administrator plans to request that the buyer to rework the crossing per DNR recommendation.
Site 4: Tract 2-2018, Sale 368, Culvert Deer Stand Sale	72-acre sale, sold but uncut with 2 blocks: 22-acre marked thinning of hardwood stand and 50-acre aspen coppice regeneration prescription. Reviewed documentation and discussed methods used

	to develop, review, and finalize prescriptions, including the partnership meeting, sale layout, marking, and how Green Tree Retention (GTR) will be implemented in the stand. Heritage database search printout was also reviewed and discussed. Contract provisions include requirements for use of BMPs, good utilization, FISTA-trained logger, seasonal restrictions, and criteria for rutting and disturbance. Hardwood stand marking observed to be consistent with silvicultural guidelines, including order of removal and creation of canopy gaps.
Site 5: Aspen Buckthorn Sale, Tract 5-2018, Sale 371	Completed aspen coppice regeneration harvest with buckthorn control. Portions of the harvest area had pre-harvest herbicide treatment of dense understory buckthorn. The treatment plan was to treat 50-foot wide strip 25 feet on each side of the existing loop trail. The treatment was successful, with buckthorn only found as scattered sprouts outside the treatment area. Aspen regeneration is present throughout the sale area. A neighbor who has a handicapped access permit for his ATV stated that “the work really changed my world here, but I suppose it is for the best.”
Site 6: Completed Selection Harvest	Discussed options for silviculture in northern hardwood stands and reviewed results of selection harvest with canopy gaps of various sizes. All aspen was cut, creating most of the gaps.

<b>Date:</b> 6 August 2019 (Cont.)	
<b>FMU:</b> Ashland County	
<b>Auditors:</b> Stefan Bergmann & Shannon Wilks	
<b>Location/ sites visited</b>	<b>Activities/ notes</b>
FME office, Ashland County	FSC & SFI opening meetings: introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, and emergency and security procedures for evaluation team
Site 7: Tract 10-15, Sale 1005	Active northern hardwood shelterwood operation with cut-to-length processor working. Logger verified to be FISTA trained and demonstrated knowledge of safe operation of equipment, use of PPE, and BMPs. Presence of spill kit onsite verified; operator demonstrated knowledge of how to properly clean up spills and the reportable quantity. Fire extinguishers and other fire suppression tools onsite; processor has a fire suppression system. Operator is not CPR training, but First-aid kits are present and there have been no jobsite injuries. FME forester monitors sale activity 2-4 times per week. FME scales all saw logs at landing. No residual damage observed.



	<p>Goal for sale is to maintain Northern Hardwood (NH) component based on sandy soil types. Treatment is to harvest all trees except cedar, hemlock, pine, and white spruce, as well as those marked with green paint. Green-painted trees were largely yellow birch retained for wildlife habitat (e.g., cavity and mast trees). FME’s guidelines are for an average of 3 retention trees per acre for each sale. FME uses WisFIRS in forest planning to track stands and activities.</p>
<p>Site 8: Tract 1-17, Sale 1017</p>	<p>Completed sale harvested in winter 2018. Stand split into 2 units with 45-acre OSR and 14-acre uneven aged stands with canopy gaps. Prescription called for harvesting mixed hardwood, balsam fir, and basswood pulp, as well as hard maple, basswood, and mixed hardwood logs. No cedar, hemlock, pine, or white spruce to be cut, nor any tree marked with green paint. Onsite observations matched prescription. No residual damage observed. 100-ft no cut RMZ established for Augustine Creek at the back of the unit.</p> <p>Roads seeded with winter rye and clover for wildlife and erosion control; seeding was locally sourced from Ashland and certified as being free of noxious weeds. Observed haul road on a slight hill with slash and debris; while it had no water bars, there was no evidence of erosion or historical issues of erosion, likely from the slash and debris embedded in the soil. FME staff stated that a berm will be installed at the road entrance to minimize the chance of vehicle use.</p>
<p>Site 9: Augustine Hunter Walking Trail</p>	<p>Walking trail is maintained by the county for hunters. The trail is along an old logging road, which is protected by a locked gate to minimize the chance of vehicles. There are 6 such trails in county. Ashland County, DNR, and Ruffed Grouse Society jointly built a walking bridge over Augustine Creek in 2015; the wood bridge is in excellent condition and shows no sign of erosion. Wisconsin has a “Berry Picker Law” that means the county is immune from liability for the recreational use of county lands by the public. The county’s recreation officer is a deputy sheriff, which has helped when there have been issues such as people cutting or going around gates.</p>
<p>Site 10: Tract 5-15, Sale 1000</p>	<p>77-acre aspen coppice sale completed in 2016. Retention trees left, including all spruce, hemlock, cedar, pine, and oak. Next scheduled entry is at 45 years. Observed abundant regeneration. Access road seeded with clover, which was well established. Large boulders were installed to block access. The stand includes a tag alder management shearing project for woodcock habitat; these projects are in non-managed lowland sites. Bobcat with Fecon mulching head used for</p>

	the tag alder; goal is to establish 0.5-acre strips every 5 years to facilitate conditions that woodcock require.
Site 11: Tract 1-18, Sale 1027	Uncut sale originally planned in 2004. Planned for individual tree selection of northern hardwoods for saw logs. Trees marked in orange paint for removal. Goal is to promote a future stand of quality hardwood. Canopy gaps installed during last harvest around pockets of oak (primarily red oak). Observed regeneration of oak, maple, and birch in gaps. FME’s basal area check confirmed 120 square feet. New groups of 30 to 60 feet in diameter will be established; existing groups from previous harvest will be expanded to provide additional light and a multi age class structure. Deer population not an issue in this area for regeneration. Boulders have been installed on the main haul road that will be used for the sale; they will be reinstalled after the sale is completed.

<b>Date:</b> 7 August 2019	
<b>FMU:</b> Douglas County Forest	
<b>Auditors:</b> Mike Ferrucci, Stefan Bergmann, and Shannon Wilks	
<b>Location/ sites visited</b>	<b>Activities / notes</b>
FME office, Douglas County, Opening Meeting	Overview of Douglas County’s forest and land management programs; review of training, CoC, and pesticide use records; discussion of climate issues and CFI inventory; and final site selection.
Site 12: Hungry Bear Trail County Forest Road	This well-designed and maintained county forest road meets BMPs for a permanent forest road. The road is crowned and surfaced with sufficient gravel to protect the road, allowing for a good running surface and facilitating regular grading. Most of the vegetation on the road shoulder is herbaceous or grassy, evidence of regular mowing to prevent encroachment of woody vegetation.
Site 13: Cut-a-way Logging Dam	Originally established in 1905 as a walking bridge across the St. Croix River. Replaced 10 years ago for recreational trail; constructed of metal beams, metal railing, and concrete decking. County consulted Native Americans due to historical use of area for gathering of wild rice. Permit for construction contained hibernaculum consideration for northern water snakes. Observation of people in kayaks using waterway for recreation.
Site 14: Trail 7, snowmobile trail	Observed trail utilized for snowmobile and winter ATV/UTV recreation that goes through Popple Island Timber Sale (see Site 15). No issues.
Site 15: Tract 52-18, Sale 4459, Popple Island Timber Sale	Lower Ox Lake Conifer Swamp. Timber sale planned for all trees except designated leave species—oaks, birch, etc. Black ash/balsam

	<p>fir dominant stand to develop from sprouts over a 45 to 50-year horizon. Cedar legacy trees planned for retention as designated leave trees; county defines legacy trees as older representative species without regard to economic value. These trees are captured within WisFIRS by tree/acre/species. Objective on this site to protect cedars. This frozen ground harvest was purchased by a FISTA-trained logger. 120-ft no-entry RMZ red painted along St Croix River. Planned deer fence from Sustainable Forestry grant through DNR for 30 acres to establish regeneration of cedar. Since this is a popular recreation area, in response to public concerns about impacts to the recreation trail the operation will use spur roads instead of the main trail as much as possible; caution signage will be posted onsite to warn of the active logging, and the county will speak with the snowmobile club prior to commencing activity. The invasive spotted knapweed is onsite, which the county monitors.</p>
<p>Site 16: Tract 14-18, Sale 4418, Snare Timber Sale</p>	<p>40-acre harvest with aerial seeding in spring 2019. Pockets of white pine residual left. Seeded 16 acres with white pine. Regen monitoring planned for 3 and 5 years. Updates to WisFIRS based on results. Process also used for follow-up prescriptions by designation in WisFIRS utilizing the County's internal planned treatment assignment policy.</p>
<p>Site 17: Tract 61-15, Sale 4298, Spring Creek Aspen Timber Sale</p>	<p>Completed 44-acre aspen coppice harvest with small amount of jack pine and balsam fir. Part of stand blew down in 2011. Sale prepped in fall of 2015, with remnants painted and used to diversify age class. Western edge is Spring Creek with RMZ reserved, verified marking with red boundary paint. Two wetland areas also protected from harvest. Sandy all-season ground. Retained group of aspen and white pines around lowland area.</p>
<p>Site 18, Douglas County Wildlife Area, clubhouse</p>	<p>40-acre special use site (clubhouse). Rented to the public by Douglas County. Established in 1925 for United Field Trialers Association. Facility built around 1935. Lease agreement and funding provided by taxes on sporting goods/ammunition. Facility maintained from revenues.</p> <p>Uses by field trialers, horseback riders, blueberry pickers and Friends of the Bird Sanctuary stakeholder group, though it is available to anyone from the public. Interviewed stakeholder representing motorized recreational trail association.</p>
<p>Site 19: Rolling Barrens Management Area</p>	<p>Semi-forested land surrounding clubhouse (see Site 18) under long-term lease to state, but it is managed collaboratively between the county and state. Maintained by prescribed fire for sharp-tailed grouse, sand warblers, and other pine barren bird species. Friends of</p>

	bird sanctuary group provides input and education; the group is in the process of buying a historic WDNR fire tower in the Rolling Barrens landscape, which will be rented out for recreation.
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<b>Date:</b> 7 August 2019 (Cont.)	
<b>FMU:</b> Douglas County Forest	
<b>Auditors:</b> Mike Ferrucci & Shannon Wilks	
<b>Location/ sites visited</b>	<b>Activities / notes</b>
Site 20: Tract 09-18, Sale 4416, Tommy G	134-acre timber sale not finalized. Harvested whole tree chips. DNR establishment goal: northern hardwood with 45-year old aspen stand. Sale is 80% frozen ground harvest. 5 acres marked as single tree selection with canopy gaps. Contractor installed new road for access on higher ground. Observed black spruce harvest. Observed open area maintained for wildlife. Buffer strip of timber maintained to minimize aspen regeneration. Habitat present for deer, bear, turkey, golden warbler, woodcock, and other species. Observed stand of single tree selection of northern hardwoods. Exemplified diversity of tract created through harvest.
Site 21: Ericson Creek Cut Across County Forest Road	This well-designed and maintained forest road meets BMPs for a permanent forest road. The road is crowned and surfaced with sufficient gravel to protect the road, allowing for a good running surface and facilitating regular grading. Most of the vegetation on the road shoulders is herbaceous or grassy, evidence of regular mowing to prevent encroachment of wood vegetation.
Site 22: Ericson Creek County Forest Road	Road meets BMPs for permanent forest road. Refer to notes for Site 22 above, all of which apply to this road as well.
Site 23: Wildlife openings along Ericson Creek County Forest Road	Permanent wildlife openings maintained by DNR Wildlife Division.
Site 24: Tract 06-17, Sale 4357, Ericson Aspen Timber Sale	101-acre sale closed June 2019. Objective to naturally regenerate stand of mature aspen. Wildlife opening mowed on 5-year cycle with surrounding uncut buffer. Contractor utilized cut-to-length harvesting system. Observed stand of red pine with aspen and oak slash used for skid trails in low areas. Some evidence of rutting but no violations of BMP guidelines or evidence of soil erosion. Observed aspen coppice regeneration. Sale area within Ericson Creek SNA boundary and Northwest Lowlands Bog Conservation Opportunity Area. Species retention of legacy species of oak, yellow birch, red, and white pine observed.
Site 25: Fred Bear Ridge County Forest Road	Road meets BMPs for permanent forest road. Refer to notes for Site 21 above, all of which apply to this road as well.

Site 26: Nanuug County Forest Road	Road meets BMPs for permanent forest road. Refer to notes for Site 21 above, all of which apply to this road as well.
Site 27: Recently built logging spur road	Crowned and prepped for harvesting operations. Road was cleared, grubbed, crowned, ditched, and graveled. A good road with all BMPs covered. This road will be closed after harvesting operations.
Site 28: Tract 32-18, Sale 4438, New Nack Timber Sale	Red-painted sale boundary. Oak wilt restriction applicable: no harvesting from 15 April to 15 July. Seed tree harvest of 20 BA of leave trees in oak areas and 50 BA in maple areas. Primary function for 20 BA area is seed source, green tree retention, and habitat structures. Observed yellow birch marked with green paint. Observed regeneration of oak and maple in understory. Goal is to open stand and allow for oak and birch regeneration with sugar maple composition. Planned 3 and 5-year regeneration checks after harvest. Good example of northern hardwood management for desired species.

<b>Date:</b> 7 August 2019 (Cont.)	
<b>FMU:</b> Douglas County Forest	
<b>Auditor:</b> Stefan Bergmann	
<b>Location/ sites visited</b>	<b>Activities / notes</b>
Site 29: Tract 55-16, Sale 4353, Moose Mayhem Timber Sale	Completed 94-acre coppice harvest along Ole Larson County Forest Road. Whole tree harvesting operation. Products produced included clean wood chips. Aesthetics were a consideration because of the unit's proximity to a public road, so residual trees included white oak from the overstory. 0.25-acre Green Tree Retention islands created. NHI database query picked up a federally-protected bird in the unit, but no nests were identified on the ground or in the database. 100-ft no-cut RMZ for Moose Creek was verified, the boundary marked with red paint.
Site 30: Tract 07-15, Sale 4250, The Waiting Game Timber Sale	Even-age 32-acre harvest of aspen stand completed two years prior and located next to the impoundment for the Jackson Box Flowage. Silvicultural goal was to naturally regenerate a mature mixed stand of white birch, fir, aspen, and red maple. The earthen dam creating the flowage was first constructed in the late 1960s and underwent a significant repair in fall 2009. The dam does not meet the height specifications or hazard rating to require state-mandated inspections. However, the county continues to inspect the dam. Last inspection was completed in 2004. This is one of 7 water control structures on the county forest. There is discussion about removing the dam because of the ongoing cost of inspections and maintenance. The area is designated as a ruffed grouse special

	<p>management area (one of 3 on the county forest), called Empire Swamp Grouse Management Area. The goal for aspen management for grouse is to coppice stands 10 years apart so that in any one area there are 3 to 5 age classes, which the grouse requires. Additionally, migratory bird species require the young forests that clear cutting produces.</p>
<p>Site 31: Main haul road</p>	<p>Class 2 county forest road accessing active operation (see Site 32) is gated with a lock and is closed to public motorized recreational access; signage present. The dirt road was muddy and rutted because of the wet conditions; no hauling has yet occurred, so the rutting is limited primarily to pickup trucks. There is no risk of sedimentation to water bodies. The forester explained that the road would be repaired following harvesting. It will be considered for motorized recreational access opening to the public after resting for two years and carefully monitored. The county has a goal of increasing open motorized road access for the public in this forest block, and this road would open several miles of access.</p>
<p>Site 32: Tract 24-17, Sale 4385, Sweet Dreams</p>	<p>114-acre even-age seed tree harvest marked at 10 to 20 BA. Leaving scattered oak, as well as large red and white pine as legacy trees. Also left small understory oak. Cut all ironwood. Boundary of unit painted red. Oak regen prolific. The goal is to overwhelm the deer with browse in order to protect the regen. The small producer has a modern cut-to-length system with low-profile, low-impact tires producing just 14 psi. No residual damage observed. Interviewed logger; verified that FISTA trained and highly experienced with processor. Spill kit, fire extinguishers, First-Aid kits, firefighting equipment, and appropriate PPE found onsite. Logger running on thick layer of slash on trails to minimize impact to soil. Products produced include pulp, logs, and material for timber mats. County forester visits 2-3 times per week. Verified presence of haul tickets with appropriate FSC claim, as well as lockbox.</p>
<p>Site 33: Tract 59-18, Sale 4454, Town Road F Timber Sale</p>	<p>64-acre even-age coppice regeneration harvest, active operation. Silvicultural goals are to regenerate scrub oak and aspen. Sandy soil, so water is not an issue. No Green Tree Retention, to maximize regeneration potential of target species in full sunlight. Interviewed logger; verified that FISTA trained. Spill kit, fire extinguishers, First-Aid kits, firefighting equipment, and appropriate PPE found onsite. All heavy equipment observed was quite old, although no leaks were observed.</p>

<p><b>Date:</b> 8 August 2019  <b>FMU:</b> Bayfield County Forest  <b>Auditor:</b> Shannon Wilks</p>	
<b>Location/ sites visited</b>	<b>Activities / notes</b>
Site 34: Tract 28-18, Sale 28-18	105-acre active sale-mixed oak and aspen. Contractor purchased in 2018. FISTA training records maintained at office. Observed Green Tree Retention islands, snags and downed trees (used for grouse/drumming logs). 2 units in stand; 94 years of age. Initial recon found oak dying and mature aspen. Best management option is seed tree, with goal of leaving 3 to 10 BA. Leave red pine/white pine. Mark with purple paint scrub oak (northern pin oak/black oak) to leave. Site index 45-50. Natural stand of red pine to leave (rare in this area). Western boundary is adjacent to private landowner, observed painted blue. Notices are sent for FM activity to neighboring private landowners. Logging road will be closed after harvesting operations to vehicle traffic; only snowmobile and ATV traffic use will be allowed.
Site 35: Sale 34-16, Tract 3426-B-16	18-acre red pine plantation, even-age management (third thin). Contractor completed in December 2017. Plan is 97 BA residual. BA checks confirmed 100 and 90 BA on 2 random samples. Wildlife habitat improved by thinning. Food source/cover developing for deer and bear. Ground conditions matched FM plan.
Site 36: Glacial Kettles Special Management Area	376-acre Special Management Area. As glaciers retracted, melting left massive potholes. LiDAR used for recon of land without canopy and maps ground. Designated and mapped in 15-year plan; set aside as non-managed and utilized for hiking.
Site 37: Tract 01-19, Sale 3556-A-19, Unit 1	85 acres divided into 3 units (see Sites 38 and 39). At active site, observed red and white pine left for Green Tree Retention. Dead tree and snag retention. Minimal damage to residual stand.
Site 38: Tract 01-19, Sale 3556-A-19, Unit 2	Aspen coppice with small diameter oaks reserved. Equipment harvesting in process. No BMP issues observed.
Site 39: Tract 01-19, Sale 3556-A-19, Unit 3	Harvest cut with marked trees and conifers left as residual. Left retention island of aspen and oak. Observation of woody slash scattered throughout stand. No issues observed.
Site 40: Tract 08-18, Sale 3505-A-18	47-acre aspen mixed hardwood completed harvest. Observed 2 retention islands and grouse drubbing stems. RMZ with 250-ft buffer due to slope/topography. Observed rock on haul road. No BMP issues. Road will be closed to all traffic except snowmobiles.
Site 41: Tract 27-14, Sale 3317-A-15	80-acre aspen coppice harvest. MOA with Red Cliff Band of Chippewa. Tribe has requested county to get permit for timber harvesting, as well as a 50-ft buffer along road. Tribe is interested in

	acquiring properties within their original boundary. County will cooperate with tribe regarding sale. Backside of sale area tribe acquired 80 acres from county post-harvest. Connection with water specific to tribe.
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<b>Date:</b> 8 August 2019 (Cont.)	
<b>FMU:</b> Bayfield County Forest	
<b>Auditor:</b> Mike Ferrucci and Stefan Bergmann	
<b>Location/ sites visited</b>	<b>Activities / notes</b>
Site 42: Tract 47-17	Active North End Oak sale in a block that has many heavily-used recreation trail. Red oak, aspen and northern hardwoods. Combination of red oak thinning and aspen coppice. 277 acres. Sold in May 2018. Actively being harvested (starting July 2019). Significant recreational component within the sale area, including cross-country skiing and mountain biking, and recreation stakeholders were interviewed. Examples of BMPs for water quality were observed. Large sale that was designed to minimize impacts to the intensive recreation component.
Site 43: Cable Rustic Yurt	Visited the Cable Rustic Yurt and discussed various recreational opportunities on the county forest.
Site 44: Ojibwe Mountain Bike Trail	A 10.5-mile deep woods, single track mountain bike trail maintained by CAMBA. This trail is classified as intermediate “with narrow and technical sections.”
Site 45: North End Trailhead and Warming Hut	Trailhead signs, gate, parking, warming cabin, and other infrastructure for trail use and maintenance. Recreation stakeholders were interviewed. Discussed various non-motorized recreational trails within the Cable block and the cooperative arrangements between recreational clubs and the Bayfield County Forestry Department. The department was praised by the stakeholders for being open, accessible, providing advance notice of potential harvests and a willingness to adjust harvesting to minimize impacts or to improve trail conditions.
Site 46: Town Road Aid Project	A portion of the road was maintained, in part, with county funds as per our County Forest Town Road Aid program (appropriates 2% of net timber sale revenue towards eligible town road repair projects). On average, \$80k per year is allocated for various town road projects (this is in addition to the mandated 10% stumpage revenue sharing payments).
Site 47: Deer Exclusion Fence	On route to Site 48, briefly saw portion of 6,300 feet of fence installed to protect 22 acres of completed red oak shelterwood and



	10 acres of white pine seed tree harvest, with adjacent unfenced control areas.
Site 48: Sale 40-12	Red oak, northern hardwoods and white pine. Combination of red oak and hardwood thinning (with gaps) and white pine shelterwood. 136 acres. Sold in November 2012. Completed November 2015, with significant deer browse damage to seedlings observed. Poly fence was installed in 2017 to exclude deer from many of the canopy gaps. Regeneration survey data comparing number of seedlings and their height show that there are far more desirable seedlings in the 5 to 10-foot range and the 10-foot and taller height classes in the fenced gaps, and more undesirable (hornbeam) trees in unfenced areas.
Site 49: Sale 39-17	Active harvest (starting in July 2019) in a 136-acre red pine stand, with some aspen clones being cut and regenerated.
Site 50: Primary system road	Main access to Sale 39-17 (see Site 49) is a well-maintained primary system road.
Site 51: Sale 60-14.	Red and white pine (natural stand). Even aged management. 99 acres. Sold in May 2015. Completed June 2017. Site was trenched in 2016, treated chemically in 2017, and planted with red pine in 2018. Discussed regeneration monitoring of planted sites and impacts of deer browse.
Site 52: Knapweed control on primary system roads	42 miles of roads were treated to control spotted knapweed. Sprayed twice, mowed, and then released biocontrol beetles. The beetles are not considered invasive.
Site 53: Town road aid project	More examples of local road maintenance supported by funds from the county forest.
Site 54: Barnes Barrens Special Management Area	Discussion of the Barnes Barrens, including prescribed burning, core area management (1,000 acre, permanently open grass/low shrub), spotted knapweed control and wildlife. Discussion about barrens management, including the control of invasive species and the importance of barrens habitat for wildlife. Example of large SNA, use of chemical to control invasive species, and use of fire to create/maintain habitat.
Site 55: Existing and New Roads, Barnes Barrens Core Area	Primary system roads and a new road for the Barnes Barrens Core Area. Discussion regarding the development of the core area, including construction of a new road to service the core area of the rolling barrens management system. Existing primary roads were also viewed. These are well designed and maintained. Road technician has developed methods to maintain stable roads in very coarse sand by retaining organic matter in the road surface to ensure growth of some grass to hold roads together.

Site 56: Sale 15-16	Completed regeneration harvest of a 42-acre aspen and scrub oak/mixed hardwood stand. Sold in May 2016 and completed in May 2017. North Country Trail runs along northern boundary, which was considered in the management (see Site 57). Wildlife considerations were observed (grouse trees/drumming logs).
Site 57: North Country Trail	Walked 0.4 mile of the North Country Trail (a hiking trail) including portions in young timber and portions adjacent to Sale 15-16. Trail is in good condition but appears to receive very little use. Discussed methods used to buffer visual impacts of the clearcut, including design to avoid crossing, retention of uncut blocks, and sale shape.

<b>Date:</b> 9 August 2019	
<b>Auditors:</b> Mike Ferrucci, Stefan Bergman, and Shannon Wilks	
<b>FMU / location / sites visited</b>	<b>Activities / notes</b>
Brule River State Forest ski warming shelter, Wisconsin Program-wide Closing Meeting	Closing meeting: review preliminary findings (potential non-conformities and observations) and discuss next steps in report preparation.

### 3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation:	3
B. Number of auditors participating in on-site evaluation:	3
C. Number of days spent by any technical experts (in addition to amount in line A):	0
D. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	4
<b>E. Total number of person days used in evaluation:</b>	<b>13</b>

### 3.1.3 Evaluation Team

<b>Auditor name:</b>	Stefan A. Bergmann	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b>	Mr. Bergmann has been in the forestry and wood products field for nearly 20 years, working across the US on forest policy, landowner extension, and forest certification. He also has senior staff executive experience with two forestry non-profits in the Midwest. Prior to joining SCS in 2017, he worked for Rainforest Alliance, 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 an SFI team auditor. He has served as lead and team auditors on numerous FSC FM audits around the country. He holds a BS in Wildlife Science and an MS in Forest Resources, both from Oregon State University, and recently completed an MBA at the University of California Davis.		
<b>Auditor name:</b>	Shannon Wilks	<b>Auditor role:</b>	Team Auditor
<b>Qualifications:</b>	Mr. Wilks has over 27 years of professional experience in the forest industry. His roles have included procurement, supply chain management, contract		

	<p>negotiations and environmental management compliance. His experience includes 20 years with a global forest products company where he spent most of his career in the southern United States. He has also managed industrial properties with land management functions. Mr. Wilks is a Controlled Wood Senior Lead Auditor for FSC® Chain of Custody, Lead auditor for Sustainable Forestry Initiative (SFI®) Chain of Custody Standard, SFI® Fiber Sourcing, SFI® Forest Management Standard, Programme for the Endorsement of Forest Certification (PEFC®) Chain of Custody Standard and a Lead Auditor for Sustainable Biomass Program (SBP). Mr. Wilks is a graduate of Louisiana Tech University with a Bachelor of Science-Forest Management degree.</p>		
<b>Auditor name:</b>	Mike Ferrucci	<b>Auditor role:</b>	Team Auditor
<b>Qualifications:</b>	<p>Mike is a founding partner and President of Interforest, LLC where he is responsible for the assembly and management of integrated teams of scientists and professional managers to solve complex forestry problems. He is also responsible for the firm’s forest certification program, which includes SFI and FSC certification and preparation services. For 12 years, Mike was the SFI Program Manager for NSF – International Strategic Registrations and responsible for all aspects of the firm’s SFI Certification programs. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. Mike has 37 years of forest management experience. He has conducted or participated in assessments of forest management on more than 14 million acres of forestland in 27 states.</p>		

### 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 reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member may review parts of the standards based on her or his 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, interviews, stakeholder comments, and reviewed documents and records. Where consensus among 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).

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.

#### 3.3.1 Stakeholder Groups Consulted

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

#### 3.3.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the major comments received from stakeholders and the evaluation 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.

Stakeholder Comment	SCS Response
“The counties are some of the best folks to work with.”	Duly noted.

<p>“While I have only limited knowledge of the County Forest Program as administered by the DNR, I do have the sense that they work hard to meet FSC standards...My rather limited observations of county timber harvests suggest FSC standards are being followed.”</p>	<p>Duly noted.</p>
<p>“I suspect that outreach about group certification and interaction with local communities could be greater by the DNR.”</p>	<p>DNR liaisons and county forest staff support a large number and wide range of environmental education activities. For example, DNR staff attend public meetings related to the management of county forests and also provide educational opportunities to the public, such as tours.</p> <p>Educating the public about Wisconsin’s county forests and the public benefits associated with sustainable forest management is a high priority for Wisconsin County Forests Association (WCFA).</p> <p>Together, the outreach activities of the DNR and WCFA provide evidence of conformance with FM Indicator 4.1.f, which requires that the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>
<p>Recreation-oriented stakeholders praised the DNR for being open, accessible, providing advance notice of potential harvests, and for their willingness to adjust harvesting to minimize impacts or to improve trail conditions. Example about hiking trail:</p> <p>“Through years of working together, in almost all cases all three of the forests [we work with] do an admirable job of protecting the trail during timber harvest operations...All of the county foresters pay special attention to putting up high amounts of flagging along the trail to alert the loggers of its presence, mark all of [the] blazed trees (route markers) for retention, and mark other scattered, nearby long-lived species for retention. They also include clauses in their timber sale contracts to protect the trail.”</p>	<p>The care that county staff take to protect snowmobile, ATC, cross-country skiing, mountain biking, and hiking trails was evident during interviews with the FME as well as at recreation sites observed during the audit. For example, at Site 57 protection measures for the North Country Trail, including those that aimed to minimize the aesthetic impacts of harvesting and reduce damage to the trail, were observed and appeared to be effective.</p> <p>The buffers and mitigations made to minimize damage to the hiking trail at Site 57 provides evidence of conformance with FM Indicator 4.4.a, which requires that the forest owner or manager both understand the likely social impacts of management activities and incorporating this understanding into management planning and operations, including the aesthetics and recreation.</p>
<p>While praise about protection of hiking trails around harvest areas was described by many stakeholders (see statement and comment above), a minority of stakeholders expressed concern about</p>	<p>As explained above, during the 2019 audit (Site 57), protection measures for aesthetics and direct impact to the North Country Trail were observed and appeared to be effective. Interviews with FME</p>

<p>protections of hiking trails. The concern is that some counties appear to be cutting heavily next to some trails. Stakeholders who stated this concern explained that they would prefer to see the harvests confined to smaller clearcut units (or at least perceived smaller due to design) adjoining the trail and also have them spread out over time.</p> <p>It appears that the experience of these stakeholders varies from county to county, with some counties providing more protections than others to such trail systems; as stated, “the less than ideal protection of the trail happened only sometimes, while at other times, the trail is totally protected.”</p> <p>One of these stakeholders also stated that logging equipment was driven across and down a hiking trail during wet conditions, as well as cutting down trees with trailmark blazes.</p>	<p>staff made it clear that they are knowledgeable about the trail systems and implement protections measures to minimize the impact to hikers.</p> <p>The counties to which these stakeholders referred in their comments were not sampled this year. The issue has been noted in the report section, <i>Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit</i> (Appendix 5), as one for the next audit team to investigate further, including potentially visiting the counties to which the stakeholders refer.</p>
<p>Douglas County was praised for encouraging and the use of the Douglas County Bird Sanctuary for field trialers. The county was noted as being very good to work with—they readily answered questions when setting up a recent field trialers event, and the rental cost for the field house and surrounding 40-acre special use site was considered reasonable. Stakeholders also noted that the fact that the site doesn’t have barbed wire is appealing to the field trialers community. As one stakeholder stated, “I got a sense that they really wanted the dogs to be there and use the area.”</p>	<p>The Douglas County Wildlife Area (Site 18) was visited as part of the audit, reinforcing the comment of this stakeholder. The accessibility of the wildlife area and associated clubhouse to the public demonstrates evidence of conformance to FM Indicator 5.5.s, which requires that FMU, the forest owner or manager maintain and/or enhance forest services and resources that serve public values, recreation and tourism.</p>
<p>Douglas County was praised for communications with local towns. Example: “When they do timber sale setup, they identify roads that may be needed for access and work with us to coordinate activities and use of the roads for logging.”</p>	<p>Alerting local towns of upcoming timber harvests demonstrates conformance with FM Indicator 4.4.c, which requires that 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>Comments about Douglas County’s communication also pertains to generally keeping an eye out for unauthorized activities on nearby properties. For example, a stakeholder stated that a county staff person let a nearby landowner know that illegal bough harvesting was occurring. The landowner’s forester called the warden, and the illegal operation was shut down and the violators fined.</p>	<p>While this comment is about unauthorized activities occurring on an adjoining property, reporting such activities may help to prevent such activities from occurring on the certified FMU. This demonstrates evidence of conformance to FM Indicator 1.5.b, which requires that if illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities.</p>

<p>A concern was expressed about how counties that issue permits for pine boughs and birch poles may not be enforcing where those with permits harvest these materials. “When permits are issued, they are good for county lands only, but people go on other lands to collect...The birch pole market is an especially aggressive one, which incentivizes people to collect where it is accessible, even if isn’t on county land...There is just no control over it. This is a huge issue...[However,] Iron county has really taken measures to try to control the birch pole issue.”</p>	<p>The counties evaluated during the 2019 audit have not reported instances of permitted users harvesting NTFPs from non-county properties. Additionally, this year’s sampled counties have issued few collection permits. While there are no FSC-certified NTFPs on county forests, the issue is worthy of greater investigation by future audit teams when counties that are more actively involved in issuing permits for pine boughs and birch poles are sampled.</p> <p>The issue has been noted in the report section, <i>Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit</i> (Appendix 5), as one for the next audit team to investigate further, including potentially visiting the counties in which pine bough and birch pole harvesting is more prevalent.</p>
<p>Stakeholders explained that the relationship between counties and nearby landowners varies from county to county.</p> <p>Comment #1: “Most of [the counties] been really good to work with...Foresters have been really hard working; they put up some great sales that have really helped to keep communities alive.”</p> <p>Comment #2: [One] county set up timber sale, but they didn’t inform us that they would need to use our road...The administrator never called back...On the flip side, there are times they they’ve done really good work.”</p>	<p>These statements highlight a theme that emerged during stakeholder consultation, namely that the experience working with counties is quite variable. During the 2019 audit, the audit team’s experience was fairly consistent among the counties sampled.</p> <p>The county to which Comment #2 refers was not sampled this year. Comments above from other stakeholders, which were corroborated during FME staff interviews, demonstrated that in the sampled counties the FME speaks with adjoining landowners, including cases in which roads are shared; this is evidence of conformance to Indicator 4.4.c.</p> <p>The issue has been noted in the report section, <i>Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit</i> (Appendix 5), as one for the next audit team to investigate further, including potentially visiting the county to which Comment #2 refers.</p>
<p>“Bayfield and Douglas Counties are model programs and doing great work.” The stakeholder described how those counties have been involved in public tours in the Pine Barrens, showing examples of what has and hasn’t worked. “They are aimed at the greater good...For the 5-Mile Barrens Plan, they work with adjacent counties to create a mosaic forest for sharptails. It’s really neat to see.”</p>	<p>The public tours and focus on the “greater good” described in this comment demonstrate conformance with FM Indicator 4.1.f, which requires that the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>

<p>“Bayfield has done really good work to show the public where deer have been fenced out. They have gone above and beyond in terms of public education regarding deer browse. It’s incredible the night and day difference [between the fenced and unfenced areas]. They have really invested in it, [including installing] signs to explain to the public the impacts of deer browse.”</p>	<p>The deer exposures and accompanying public signs intended to explain and show the impacts of deer on forests described in this comment demonstrate conformance with FM Indicator 4.1.f, which requires that the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>
<p>The WCFP as a whole was praised for publishing the bids and pricing online for timber sales. “It is super helpful for the industry...They do a really good job of doing that.”</p>	<p>Duly noted.</p>

## 4. Results of Evaluation

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

Table 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.

Principle / Subject Area	Identified Strengths Relative to Conformity to the Standard	Identified Weaknesses Relative to Conformity to the Standard
<p><b>P1: FSC Commitment and Legal Compliance</b></p>	<p>Some counties, such as Douglas County, offer an anonymous violation reporting form on their websites that can be used by citizens to submit violation reports. Many counties have brochures that cover a variety of topics, including rules and regulations governing use of the forest, that are available to the general public as mechanisms for public education. This is evidence of conformance to Indicator 1.5.b.</p>	<p>No weaknesses detected.</p>
<p><b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b></p>	<p>Counties hold public meetings on planned management activities, for which records are maintained and publicly available. Many counties also have a Citizen Advisory Committee that includes representatives of different interests, including recreational user groups and other use rights holders. Where tribal resources or rights exist, each county holds consultations with tribes during the management planning process. This is evidence of conformance to Indicator 2.2.b.</p>	<p>No weaknesses detected.</p>



<p><b>P3: Indigenous Peoples' Rights</b></p>	<p>FME staff consult with tribes on the location of known archeological sites, as confirmed in interviews with county staff. The Chippewa Potawatomi Tribe has rights to hunting and gathering on public lands within the ceded territory. The DNR conducts consultations with tribes at broad levels over concerns on certain resources, such as birch bark. Consultation on cultural and historic sites and other management goes beyond the Chippewa Treaty rights and often involves other Wisconsin tribes such as the Potawatomi. This is evidence of conformance to Indicator 3.3.a.</p>	<p>No weaknesses detected.</p>
<p><b>P4: Community Relations &amp; Workers' Rights</b></p>	<p>Among the community goals that county forests provide, recreational opportunities remain important. County forests work closely with recreational user groups such as ATV/UTV, snowmobile, mountain bike, horse riding, and cross-country ski clubs to ensure that ample opportunities for recreation are created while protecting natural resources. This is evidence of conformance to Indicator 4.4.a.</p>	<p>No weaknesses detected.</p>
<p><b>P5: Benefits from the Forest</b></p>	<p>Wisconsin has mills capable of using various grades of timber. Silvicultural prescriptions on the observed WCFP harvest sites promoted the development of high-quality stands of hardwood through TSI and shelterwood harvests. Pulp and paper, firewood, and biomass are options for most county lands on other sites. Examples of optimization were observed in pine thinnings through the use of processors so that varying grades of lumber could be obtained through better utilization. This is evidence of conformance to Indicator 5.2.b.</p>	<p>No weaknesses detected.</p>
<p><b>P6: Environmental Impact</b></p>	<p>DNR wildlife biologists work with liaison foresters and county forest administrators to plan and carry out projects for wildlife habitat improvement. Some recent examples of efforts to benefit wildlife include the Young Forest Initiative, barrens restoration and management,</p>	<p>No weaknesses detected.</p>

	grouse/woodcock habitat enhancement, and turkey habitat enhancement. Projects are often conducted in partnership with other groups including Ruffed Grouse Society, National Wild Turkey Federation, and US Fish and Wildlife Service. This is evidence of conformance to Indicator 6.3.b.	
<b>P7: Management Plan</b>	Social impacts are presented mostly in county plans, which include sections on treaty rights, cultural features, administration, training, ordinances, etc. Additional information is found in appendices. WCFA maintains information on socioeconomic impacts of the FME on its website, and was a part of the Wisconsin's Forest Practices Study (WFPS) to examine the impacts of Wisconsin's forestry practices. This is evidence of conformance to Indicator 7.1.j.	No weaknesses detected.
<b>P8: Monitoring &amp; Assessment</b>	WCFP requires annual reports and annual work plans for each county. These annual plans routinely include information on the system of forest roads. <i>Wisconsin's Forestry Best Management Practices for Water Quality</i> includes the need for inspection at regular intervals for active roads and inspection of inactive roads. County staff interviewed indicated that their regular presence in the forest is an important mechanism for monitoring road conditions. Any problems noted by staff are promptly reported to the county administrator. This is evidence of conformance to Indicator 8.2.d.2.	No weaknesses detected.
<b>P9: High Conservation Value Forests</b>	Periodic reconnaissance is conducted updating and targeted monitoring visits to some HCVFs each year as needed. HCV areas mostly undergo passive management. Interviews with staff indicate that these are visited periodically to ensure that there is little to no visible anthropogenic disturbance. For example, Gobbler Lake State Natural Area is annually surveyed for invasive species. HCVs within harvest units are primarily in sensitive areas	No weaknesses detected.

	that are identified during pre-harvest reconnaissance and monitored during post-harvest close-out evaluations to ensure effective protection measures. This is evidence of conformance to Indicator 9.4.a.	
<b>P10: Plantations</b>	NA	NA
<b>Chain of Custody</b>	Interviewed county staff demonstrated awareness of when to use haul tickets and how to assign them to each sale. Informal training occurs at WCFA meetings to review certification issues, including COC. Operators showed proper understanding of how to use the trip ticket system and the purpose of the COC procedures. This is evidence of conformance to FM/COC Indicator 5.1.	No weaknesses detected.
<b>Group Management</b>	NA	NA

## 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 evaluation 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.

### 4.3. Existing Corrective Action Requests and Observations

<b>Finding Number: 2018.1</b>	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to (when more than one FMU):</b>	
<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>	FSC-US Forest Management Standard 6.5.b

**Non-Conformity (or Background/ Justification in the case of Observations):**

At Site 6 (Taylor County—Forest Timber Sale 7-16 #648), an improperly constructed water bar on a skid trail was observed on the closed-out unit. The water bar was installed perpendicular to the trail and had no outlet. The same trail crossed an ephemeral stream, showing signs of erosion and compaction at the equipment crossing.

At Site 13 (Lincoln County), Poplar County Road was observed as having extensive sections with many parallel, shallow (1- to 2-inch deep) ruts which are not causing erosion or movement of sediment off of the road. There were no water quality impacts observed. The road surface is fine-textured native material, with no crown, so the ruts hold rainwater which impairs the ability of the road surface to sustain use without further rutting.





For active roads, the *Wisconsin Forestry Best Management Practices for Water Quality* field manual (PUB FR-093 2010) states that roads must be well maintained. BMPs include (page 61):

- Inspect the road system at regular intervals, especially after heavy rainfall, to detect problems and schedule repairs...
- Keep traffic to a minimum during wet periods and spring breakup to reduce maintenance needs...[and]
- Shape road surfaces periodically to maintain proper surface drainage. Fill in ruts and holes with gravel or compacted fill as soon as possible to reduce erosion potential.

The conditions observed at the two sites suggests that there is an opportunity to improve road maintenance to comply with Wisconsin BMPs.

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

Forest operations shall meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.

<p><b>FME response</b> <i>(including any evidence submitted)</i></p>	<ul style="list-style-type: none"> <li>• Taylor County has an annual monitoring and maintenance routine on sites. Site 6 was monitored following the audit and if the site deteriorates requiring additional repairs to protect an ephemeral stream, a course of action will be put in place to correct the situation. In 2018, additional BMP training was offered to all County Forest staff that had not taken training. Annual training sessions are offered to County staff. Update--July 2019 annual inspection did not reveal a need for additional corrections on the closed trail.</li> <li>• Lincoln County took before pictures in four locations along the road on 8/14/18, then spread 216 yards of crushed gravel on the worst portions of the road between 8/15/18 and 8/20/18 and graded and crowned the entire 2.35 miles of this road on 8/20/18. After pictures of the four previously photographed sites were taken on 8/21/18 to document the improvements that were made. (2 sites below)</li> </ul> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>Site #4 Before</p> </div> <div style="text-align: center;">  <p>Site #4 After</p> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 20px;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div> <p style="text-align: center; margin-top: 10px;">Road gravel and grading. Before photos-8/14/18; After photos-8/21/18</p> <ul style="list-style-type: none"> <li>○ <b>Lincoln County Field Inspections Conducted.</b> Regular inspections are conducted on Poplar Road as a part of Lincoln County’s normal road maintenance program. The gravel which was spread, combined with routine grading and crowning should improve the shallow rutting situation which was observed. Future maintenance of this road will include placing gravel in areas as needed and maintaining proper surface drainage to reduce the impact of water direct sunlight onto the road surface to encourage drying the roads out quicker after rain events. Poplar road is scheduled for brushing.</li> </ul>
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<p><b>FME response, cont.</b></p>	<p>standing in ruts on the road. Update- July,2019- One culvert was replaced, improved ditching in areas to improve water drainage on Poplar Road. In addition, 144 yards of additional gravel was brought in to improve sections needing repair after a rain-storm event. Roadside brushing has also been conducted on other County Forest gas tax roads to improve air flow and more</p> <ul style="list-style-type: none"> <li>• <b>Communication with WCFA.</b> During 2018 Fall County Forest Administrator meeting and Legislative/Certification Committee Meeting, as well as 2019 Spring WCFA Conference meeting and Legislative/Certification Committee Meeting, the issue of monitoring/addressing County Forest Gas Tax Roads (which Poplar Road is) as well as construction of water bars on trails was discussed for conformance with FSC Standard 6.5.b</li> <li>• <b>Communications with individual County Forestry Programs.</b> Results of the 2018 certification audits, specific to CARs/Observations, are given to each administrator and DNR liaison. Those results are discussed at the annual partnership meetings and address issues at the county level.</li> </ul>
<p><b>SCS review</b></p>	<p>The audit team reviewed the photos and description of activities undertaken to address the road issues identified in 2018. Review of inspection reports, training records, and interviews with state liaison and county staff verified that the stated actions had been completed. Additionally, the audit team found all roads, trails, and other transportation corridors observed during the 2019 field audit to be well constructed and maintained and in full compliance with the FSC standard. Review of photo evidence and documents, interviews with staff, and field observations in 2019 warrant closure of this OBS.</p>
<p><b>Status of CAR:</b></p>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Upgraded to Major  <input type="checkbox"/> Other decision (refer to description above)</p>

<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 audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-US Forest Management Standard 6.6.d

<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> On two occasions, an Oneida County forester applied chemical herbicide after the expiration of his/her Wisconsin Pesticide Applicator’s certification. The forester’s certification expired on 3/31/18. Chemical herbicide applications occurred on 6/18/18 (0.5 Gal of Garlon Ultra) and 7/3/18 (0.1 Gal of Garlon Ultra). The forester has signed up for the required training to reinstate certification. Documentation confirming that the training will occur on 9/19/18 was reviewed.	
<b>Corrective Action Request (or Observation):</b> Chemicals must be 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.	
<b>FME response (including any evidence submitted)</b>	<ul style="list-style-type: none"> <li>• Oneida County: Paul Fiene-38924 took training and passed certification on 9-19-18</li> <li>• County Forest Specialist communication with WCFA during 2018 Fall County Forest Administrator meeting and Legislative/Certification Committee Meeting regarding ensuring each county to review staff that are licensed applicators and when license expires.</li> <li>• County Forest Specialist communication with WCFA in a follow up direct email for upcoming Pesticide Applicator Training Program with UW-Extension, including Registration site and additional information webpage.</li> <li>• Communications with individual County Forestry Programs. Results of the 2018 certification audits, specific to CARs/Observations, are given to each administrator and DNR liaison. Those results are discussed at the annual partnership meetings and address issues at the county level.</li> </ul>
<b>SCS review</b>	The audit team reviewed samples of pesticide applicator records, training records, and communications described in the FME response above. All records of pesticide applicator licenses reviewed were up to date. State liaison and county staff who apply or oversee the application of chemicals conveyed a strong understanding of the risks, proper safety equipment, and how to minimize environmental impacts on non-target species and sites. Review of these materials and FME interviews warrant closure of this OBS.
<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)

#### 4.4. New Corrective Action Requests and Observations

No findings were issued as a result of the 2019 recertification evaluation.

#### 4.5 Major Nonconformances

X	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.
NA	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.



<b>NA</b>	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.
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## 5. Certification Decision

<b>Certification Recommendation</b>	
<b>FME be awarded FSC certification as a “Well-Managed Forest” subject to the minor corrective action requests stated in Section 4.2.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>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. A positive certification decision indicates that:</p> <ul style="list-style-type: none"> <li>■ Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a new certificate;</li> <li>■ No Major CARs were issued to the FME during the evaluation;</li> <li>■ Any Major CARs issued during the audit were closed prior to report finalization;</li> <li>■ The FME has demonstrated that its 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;</li> <li>■ The FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.</li> </ul>	
<p><b>Comments:</b> WCFP is a well-organized and implemented forestry program that has been found by the audit team to be in full compliance with the FSC FM, Trademark, and Group Standard. The program’s strong leadership both at the state and individual county levels lends itself to these positive outcomes.</p>	

## SECTION B – APPENDICES (CONFIDENTIAL)

### Appendix 1 – Current and Projected Annual Harvest

<p>The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood):</p>	<p>WCFP measures AAH in acres, and that figure varied from county to county. In sum, the AAH for the FSC-certified counties is 45,000 acres per year.</p> <p>15-year average harvest for the FSC-certified is aligned with this AAH at 45,251 acres. In 2018, FSC-certified counties harvested 696,662 cords of pulpwood and 22,984 MBF of sawlogs on 37,490 acres.</p>
<p>Explanation of the assumptions, methodology, and reference to the data source upon which AAH and NTFP harvest rates estimates are based:</p>	
<p>For each county, the county forest administrator and DNR liaison use WisFIRS to generate an annual and a long-term harvest schedule and goals to meet the needs of both county and state work planning and the statutorily required reporting of annual allowable harvest to the legislature. The creation of harvest schedules and goals for each county is accomplished by utilizing the WisFIRS planning features. WisFIRS planning functionality attempts to more evenly distribute timber harvest practices over a 15-year period by cover type and treatment type (e.g., aspen clearcuts) for each FMU. It does this by utilizing early and late harvest constraints along with estimated average harvest intervals by cover and treatment type for each county. In order to ensure that planning has been run and accepted once annually, the harvest schedules for all properties are reviewed by the Bureau of Field Forestry Operations in March each year.</p> <p>For NTFPs, the volume of sphagnum moss and number of Christmas trees harvested are tracked. Harvest areas and intervals for sphagnum moss are established based on data from past years that show how quickly the resources can recover. Other NTFPs are small scale and are controlled and harvest volumes monitored through issuing permits (e.g., Christmas trees, firewood). Permits are also issued to tribal members for gathering of boughs, tree bark, lodge poles, marsh hay, jack pine stumps, and maple syrup. No NTFPs are FSC-certified.</p>	

### 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.

FMU Name	FMU Size Category: - SLIMF	Forest Type: - Plantation	Rationale for Selection: - Random Sample
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	- non-SLIMF - Large > 10,000 ha	- Natural Forest	- Stakeholder issue - Ease of access - Other – please describe
Barron County Forest	non-SLIMF (medium)	natural forest	sampling rotation, medium size
Ashland County Forest	non-SLIMF (large)	natural forest	sampling rotation, large size
Douglas County Forest	non-SLIMF (large)	natural forest	sampling rotation, large size
Bayfield County Forest	non-SLIMF (large)	natural forest	sampling rotation, large size

### Appendix 3 – Additional Evaluation Techniques Employed

None.

Additional techniques employed (*describe*):

### Appendix 4 - Staff and Stakeholders Consulted

#### List of FME Staff Consulted

To protect privacy, only FME staff who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**

Name	Title	Contact Information	Consultation method
Alex Rowe	Douglas County Forester	-	In person
Andrew O’Krueg	Bayfield County Forester	<a href="mailto:aokrueg@bayfieldcounty.org">aokrueg@bayfieldcounty.org</a>	In person
Andy Stoltman	DNR Forest Economics and Ecology Section Chief	<a href="mailto:Andrew.Stoltman@wisconsin.gov">Andrew.Stoltman@wisconsin.gov</a>	In person
Ben Broquard	Forest County Assistant Forest Administrator	No longer works for Forest County	In person
Bob Hanson	DNR Wildlife Biologist	<a href="mailto:Robert.Hanson@wisconsin.gov">Robert.Hanson@wisconsin.gov</a>	In person
Caleb Brown	Bayfield County Forester	<a href="mailto:cbrown@bayfieldcounty.org">cbrown@bayfieldcounty.org</a>	In person
Carmen Hardin	DNR Applied Forestry Bureau Director	<a href="mailto:Carmen.Hardin@wisconsin.gov">Carmen.Hardin@wisconsin.gov</a>	In person
Cathy Khalar	Douglas County Office Associate III	-	In person
Chris Hoffman	Ashland County Forest Administrator	<a href="mailto:choffman05@live.com">choffman05@live.com</a>	In person
Clint Meyer	Douglas County Parks & Recreation Supervisor	-	In person
Craig Golembiewski	Douglas County Forest Management Supervisor	<a href="mailto:Craig.Golembiewski@douglascountywi.org">Craig.Golembiewski@douglascountywi.org</a>	In person
Dave Kafura	DNR Forest Hydrologist	<a href="mailto:David.Kafura@wisconsin.gov">David.Kafura@wisconsin.gov</a>	In person
Doug Brown	DNR County Forest and Public Lands Specialist	<a href="mailto:Douglas.Brown@wisconsin.gov">Douglas.Brown@wisconsin.gov</a>	In person
Eric Sirrine	DNR Barnes Team Leader	<a href="mailto:Eric.Sirrine@wisconsin.gov">Eric.Sirrine@wisconsin.gov</a>	In person

Greg Kessler	DNR Wildlife Biologist	<a href="mailto:Gregory.Kessler@wisconsin.gov">Gregory.Kessler@wisconsin.gov</a>	In person
Heather Berklund	DNR Forest Field Operations Deputy Administrator	<a href="mailto:Heather.Berklund@wisconsin.gov">Heather.Berklund@wisconsin.gov</a>	In person
Jacob Coonen	DNR Forester	<a href="mailto:Jacob.Coonen@wisconsin.gov">Jacob.Coonen@wisconsin.gov</a>	In person
Janette Cain	DNR County Forest Liaison—Barron County	<a href="mailto:Janette.Cain@wisconsin.gov">Janette.Cain@wisconsin.gov</a>	In person
Jason Bodine	Bayfield County Forestry and Parks Administrator	<a href="mailto:jbodine@bayfieldcounty.org">jbodine@bayfieldcounty.org</a>	In person
Jason Holmes	Bayfield County Inventory and Analysis Forester	<a href="mailto:jholmes@bayfieldcounty.org">jholmes@bayfieldcounty.org</a>	In person
Jen Bratsch	Bayfield County Recreation Forester	<a href="mailto:jbratsch@bayfieldcounty.org">jbratsch@bayfieldcounty.org</a>	In person
Jenna Malinowski	DNR Wildlife Biologist	<a href="mailto:jenna.malinowski@wisconsin.gov">jenna.malinowski@wisconsin.gov</a>	In person
Jeremiah Neitzel	Bayfield County Forester	<a href="mailto:jneitzel@bayfieldcounty.org">jneitzel@bayfieldcounty.org</a>	In person
Jerome Wotachek	Ashland County Forester	-	In person
Jim Latvala	DNR County Forest Liaison--Douglas County	<a href="mailto:James.Latvala@wisconsin.gov">James.Latvala@wisconsin.gov</a>	In person
Jim Warren	DNR Public & Private Forestry Section Chief	<a href="mailto:JamesK.Warren@wisconsin.gov">JamesK.Warren@wisconsin.gov</a>	In person
John Cisek	Baron County Forest Administrator	<a href="mailto:john.cisek@co.barron.wi.us">john.cisek@co.barron.wi.us</a>	In person
John Mesko	Bayfield County Forester	<a href="mailto:jmesko@bayfieldcounty.org">jmesko@bayfieldcounty.org</a>	In person
John Wendorski	Clark County Assistant Forest Administrator	<a href="mailto:john.wendorski@co.clark.wi.us">john.wendorski@co.clark.wi.us</a>	In person
Jon Harris	Douglas County Director of Forestry & Natural Resources	<a href="mailto:jharris@douglascountywi.org">jharris@douglascountywi.org</a>	In person
Joseph LeBouton	DNR County Forest Liaison--Bayfield County	<a href="mailto:Joseph.LeBouton@wisconsin.gov">Joseph.LeBouton@wisconsin.gov</a>	In person
Justin Holmes	Douglas County Forester	-	In person
Kathleen Klow	DNR Forester	<a href="mailto:kathleen.klow@wisconsin.gov">kathleen.klow@wisconsin.gov</a>	In person
Keb Guralski	Douglas County Inventory Forester/GIS Specialist	-	In person
Kevin Morgan	DNR Wildlife Biologist	<a href="mailto:Kevin.Morgan@wisconsin.gov">Kevin.Morgan@wisconsin.gov</a>	In person
Kristine Buchholtz	DNR Forestry Specialist and Fire Program Staff Specialist	<a href="mailto:Kristine.Buchholtz@wisconsin.gov">Kristine.Buchholtz@wisconsin.gov</a>	In person
Kyle Young	DNR Spooner Team Leader	<a href="mailto:Kyle.Young@wisconsin.gov">Kyle.Young@wisconsin.gov</a>	In person
Lance Wegner	Douglas County Forestry & Parks Technician	-	In person
Larry Glodoski	DNR Northwest District Forestry Leader	<a href="mailto:Lawrence.Glodoski@wisconsin.gov">Lawrence.Glodoski@wisconsin.gov</a>	In person
Lindley Mattson	Bayfield County Office Manager	<a href="mailto:lmattson@bayfieldcounty.org">lmattson@bayfieldcounty.org</a>	In person
Mark Hager	Douglas County Forester	-	In person

Mark Heyde	DNR Sustainable Forest Certification Coordinator	<a href="mailto:Mark.heyde@wisconsin.gov">Mark.heyde@wisconsin.gov</a>	In person
Mark Liebaert	Douglas County Board Chair	-	In person
Matt Schultz	Ashland County Assistant Forest Administrator	<a href="mailto:ashlandcountyforest@outlook.com">ashlandcountyforest@outlook.com</a>	In person
Mike Ammon	Bayfield County Forester	<a href="mailto:mamman@bayfieldcounty.org">mamman@bayfieldcounty.org</a>	In person
Mike Dahlby	Chippewa County Forest Administrator	No longer works for Chippewa County	In person
Mike Peterson	Washburn County Forest Administrator	<a href="mailto:mlpeters@co.washburn.wi.us">mlpeters@co.washburn.wi.us</a>	In person
Nolan Kriegel	DNR Forest Hydrologist and BMP Forester	<a href="mailto:Nolan.Kriegel@wisconsin.gov">Nolan.Kriegel@wisconsin.gov</a>	In person
Ryan Magana	DNR Regional Ecologist	<a href="mailto:Ryan.Magana@wisconsin.gov">Ryan.Magana@wisconsin.gov</a>	In person
Sara Stack	DNR County Forest Liaison – Ashland County	<a href="mailto:Sara.Stack@wisconsin.gov">Sara.Stack@wisconsin.gov</a>	In person
Shelley Wrzochalski	DNR Wausau Team Leader	<a href="mailto:Michele.Wrzochalski@wisconsin.gov">Michele.Wrzochalski@wisconsin.gov</a>	In person
Steve Probst	Bayfield County Assistant Forest and Parks Administrator	<a href="mailto:sprobst@bayfieldcounty.org">sprobst@bayfieldcounty.org</a>	In person
Terry Asleson	DNR Brule Team Leader	<a href="mailto:Terry.Asleson@wisconsin.gov">Terry.Asleson@wisconsin.gov</a>	In person
Todd Naas	DNR Wildlife Biologist	<a href="mailto:Todd.Naas@wisconsin.gov">Todd.Naas@wisconsin.gov</a>	In person
Tom Ernst	Ashland County Office Assistant	-	In person
Tom Onchuck	DNR Park Falls Team Leader	<a href="mailto:Thomas.Onchuck@wisconsin.gov">Thomas.Onchuck@wisconsin.gov</a>	In person

### List of other Stakeholders Consulted\*

To protect privacy, only stakeholders who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**

Name	Title	Contact Information	Consultation method	Requests Stakeholder Notification? (Y/N)
Jane Severt	WCFA Executive Director (retired)	<a href="mailto:wafa@frontier.com">wafa@frontier.com</a>	In person	Yes
Gary Zimmer	WCFA Assistant Executive Director	<a href="mailto:wafa2@frontier.com">wafa2@frontier.com</a>	In person	Yes
Mike Luedeke	WCFA Board of Directors	<a href="mailto:mcludeke@hotmail.com">mcludeke@hotmail.com</a>	In person	Yes
Kent Makela	Member, Wisconsin Woodland Owners Association	<a href="mailto:ausdauerdogs@cheqnet.net">ausdauerdogs@cheqnet.net</a>	Email	Yes
Doug Ziegler	Minnesota Brittany Club	<a href="mailto:zieglerdj@comcast.net">zieglerdj@comcast.net</a>	Phone	Yes

Annie Husa	Region Manager, Lake States, Hancock Forest Management	<a href="mailto:AHussa@hnrq.com">AHussa@hnrq.com</a>	Phone	Yes
Ron Bergin, Executive Director	CAMBA and North End Ski Club	<a href="mailto:camba@cheqnet.net">camba@cheqnet.net</a>	In person	Yes
Ben Popp	Executive Director, American Birkebeiner Ski Foundation	<a href="mailto:ben.popp@birkie.com">ben.popp@birkie.com</a>	In person	Yes
Anonymous**	-	-	-	-

\* Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities.

\*\* Note: Several additional external stakeholders who have chosen to remain anonymous were interviewed.

## Appendix 5 – Required Tracking

### Pesticide Derogations

There are no active pesticide derogations for this FME.

Name of pesticide / herbicide (active ingredient)		Date derogation approved
NA		NA
Condition	Conformance (C / NC)	Evidence of progress
NA	NA	NA

### Progressive HCVF Assessments

FME does not use partial or progressive HCVF assessments.

*Note: In the case the FME is not operating in the entire management unit, it is permissible to only complete an HCVF assessment for the portion of the unit in which they are operating under special conditions. In such cases, the HCVF assessment must be extended if new areas are entered without an existing, appropriate HCVF assessment having been completed. An example includes a large forest concession where harvesting is initially limited to a smaller geographic scope.*

Partial or progressive HCV must be noted in SCS tracking system for monitoring. Describe below the FME monitoring plan to ensure additional HCVF assessments are completed as necessary:  
HCV Monitor Plan - NA

### Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

<input type="checkbox"/>	Not applicable; no significant issues identified that may impact the next audit.
<b>Some issues were identified during this audit that the next audit team could consider in the next audit, such as:</b>	
<input type="checkbox"/>	Scope of certificate:

<input type="checkbox"/>	Audit sampling:
<input type="checkbox"/>	Audit time:
<input type="checkbox"/>	Audit season:
<input type="checkbox"/>	Travel time between sites or FMUs:
<input type="checkbox"/>	Audit frequency:
<input type="checkbox"/>	Suggested audit team competency for next audit:
<input type="checkbox"/>	Suggested requirements to include during the next audit:
<input checked="" type="checkbox"/>	Suggested issues investigate during the next audit:  The likelihood of county-issued permit holders harvesting on adjoining landownerships should be investigated (see stakeholder comments). Consider visiting counties in which the greatest number of pine bough and birch pole permits are issued and speak with adjoining landowners to assess this likelihood.
<input type="checkbox"/>	Suggested sites for inspection:
<input type="checkbox"/>	Stakeholders to be consulted:
<input type="checkbox"/>	Other(s) – please describe:

## Appendix 6 – Forest Management Standard Conformance Table

*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>P1 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>		
<b>C1.1 Forest management shall respect all national and local laws and administrative requirements.</b>	C	-
<b>1.1.a Forest</b> management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and <b>administrative requirements</b> (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <b>Certifying Body</b> (CB) during the annual audit.	C	The Wisconsin County Forest Program (WCFP) was established per County Forest Law (s 28.11 Wis. Stats.) (County Forest Comprehensive Land Use Plans (CLUP) – Ch. 905 (typically), 28.11 Wis. stats., NR 47, NR 48, & NR 51, Wis. Admin. Code.). All management planning documents are based on applicable laws and regulations cited in 2.1 of the FSC report. Forest Management Plans (FMPs) were reviewed for counties sampled during the audit.

		<p>A description of the role of DNR liaison foresters working with County Forests can be found in the resource titled <i>WDNR Public Forest Lands Handbook 24605</i>. Their primary involvement, as required by statute, is assistance in long-term and annual planning, delivery of technical assistance, and county forest timber sale approvals.</p> <p>County Forest Administrators maintain files with documentation of any violations or lawsuits. No counties reported violations to legal requirements or any new or ongoing lawsuits related to their county forestlands since the last annual surveillance audit.</p>
<p><b>1.1.b</b> To facilitate legal compliance, the <b>forest owner or manager</b> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	C	<p>Contracts reference applicable laws and regulations including OSHA requirements. Similarly, other contracts, such as pesticide contracts reference applicable laws and regulations, including OSHA requirements. Wisconsin DNR &amp; county staff have access to training opportunities that deal with compliance to BMPs, RTE species, and other legal/regulatory requirements. These were confirmed through staff interviews, training records and online resources.</p>
<p><b>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b></p>	C	-
<p><b>1.2.a</b> 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.</p>	C	<p>10% of stumpage payments are made from County Forests (county government) to municipalities (towns &amp; villages) in the form of Severance Tax. These payments are verified during periodic (every 3 years) internal audits of the County Forest program conducted by DNR in each county. The most recent internal audits for each of the counties visited during the 2018 audit were reviewed and payment was confirmed in each of the audits. The procedures for the internal audits are included in the <i>WDNR Public Forest Lands Handbook</i>. In addition, some county forests work with a Citizen Advisory Committee that tracks fiscal performance and payments.</p>
<p><b>C1.3. In signatory countries, the provisions of all binding international</b></p>	C	-



<p><b>agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b></p>		
<p><b>1.3.a.</b> Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.</p>	C	<p>Based on a review of the agreements referenced in the indicator, the U.S. is not a signatory and/or has not ratified several of the agreements referenced in the indicator (e.g., many ILO Conventions and Convention on Biodiversity) and others have very limited, or no, direct impact/applicability to county forest management. Any wild ginseng harvests, which are subject to CITES, are regulated according to WDNR protocols.</p>
<p><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></p>	C	-
<p><b>1.4.a.</b> Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.</p>	NA	<p>No conflicts between compliance with laws or regulations and FSC Principles, Criteria or Indicators have been identified</p>
<p><b>C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b></p>	C	-
<p><b>1.5.a.</b> The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <b>Forest Management Unit (FMU)</b>.</p>	C	<p>Timber theft, trespass, and other illegal or unauthorized activities on county forests are dealt with locally and are typically investigated by county law enforcement, DNR wardens, or county forest patrol or recreation staff, as confirmed through interviews with county staff. The FMUs are regularly patrolled by county or DNR employees to detect illegal or unauthorized activities. Recreational user groups (e.g., ATV/HUV clubs, snowmobile clubs, and mountain biking clubs) are important mechanisms for monitoring the behavior of recreational users. Additionally, active timber sales are monitored by county foresters several times per week, which includes ensuring that illegal or unauthorized</p>

		<p>activities in harvested sites do not occur. County sheriffs, wardens, and other law enforcement issue citations for ordinance violations (e.g., off-trail ATV use, unpermitted firewood cutting, illegal deer stands, etc.).</p> <p>WCFP takes considerable action to limit illegal and unauthorized activities. Audit team observed gates, berms, and the implementation of other access control techniques including posted signs indicating allowed uses. Surveillance techniques may also be employed in cases of vandalism, trespass, dumping, or other illegal activities.</p> <p>Property boundaries are marked on the ground in advance of timber sales, as well as on harvest map, as verified by the 2019 audit team.</p>
<p>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.</p>	<p>C</p>	<p>Maintaining a regular presence and good relations with user groups, as described in 1.5.a., are considered actions designed to curtail illegal or unauthorized activities.</p> <p>Wisconsin law allows flexibility in how timber theft and trespass cases are treated. Fines or payment of yield taxes or severance shares can be assigned. Such fines or payments are set between \$100 and \$10,000, but violators may be subject to criminal prosecution or required to cover additional expenses for the assessment and recovery of stolen timber. No significant instances of timber trespass were reported for the counties sampled in this year's audit.</p> <p>Illegal harvesting of birch poles and pine boughs occurs on occasion. Monitoring with cameras and on-the-ground enforcement patrols are used to detect violators. In some areas, the counties have painted roadside birch to more easily track any trees removed illegally.</p>

		<p>Some counties, such as Douglas County, offer an anonymous violation reporting form on their websites that can be used by citizens to submit violation reports. Many counties have brochures that cover a variety of topics, including rules and regulations governing use of the forest, that are available to the general public as mechanisms for public education.</p>
<p><b>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b></p>	<p>C</p>	<p>-</p>
<p><b>1.6.a.</b> 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.</p>	<p>C</p>	<p>All county forests that are FSC certified have made commitments. For example, the following is from the Price County Management Plan: “To that end, Price County will commit to the Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC) in the management of the Price County Forest. These certification standards fit within the framework of the County Forest Law program (s. 28.11, Wis. Stats.)” Likewise, Vilas County Board of Supervisors adopted a resolution on 22 August 2017 that stated; “Whereas, the Vilas County Board of Supervisors on 28 February 2017 formally accepted and committed to dual certification and participation in the Sustainable Forestry Initiative® (SFI®) and the Forest Stewardship Council® (FSC®) forest certification systems and management of the Vilas County Forest.” While these two counties were not sampled as part of this audit, they nonetheless fall within the certified multi-FMU certificate and therefore serve as examples of evidence of conformance to this indicator.</p>
<p><b>1.6.b.</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</p>	<p>C</p>	<p>Each county with forests under the Wisconsin County Forest Program has the option to be certified to either or both of the FSC or SFI standard. Of the 29 counties, 21 have attained FSC certification. Certified county forests may have limited amount of forestlands they hold outside of the FSC certificate, which are documented in the CLUP. In general, excluded forestlands are unsuitable for timber</p>

<p>excluded from certification, and the management activities planned for the holdings being excluded from certification.</p>		<p>management due to species composition (e.g., low timber value), difficulty in regeneration, and other reasons as stated in each county’s CLUP.</p>
<p><b>P2 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>-</p>
<p><b>2.1.a</b> 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>County Land Information Department and Register of Deeds maintain all documentation related to ownership and use rights for all counties. Each county’s CLUP includes an explanation of ownership and use rights and the authority to manage the FMU.</p>
<p><b>2.1.b</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>Register of Deeds maintains any recorded agreements held with other parties, as verified through a sample of records for counties visited. See County Forest CLUP– Ch 500 for policies specific to public use/access, including any schedule of public use fees. Stakeholders interviewed recognize the use and access rights of multiple user groups.</p>
<p><b>2.1.c</b> 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>Maps included in timber sale prospectuses for each county visited in 2019 included property boundaries where they existed. Timber sale boundaries were clearly marked with paint in the field and set back from any property boundaries, which was confirmed in maps and interviews with staff.</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><i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all</i></p>	<p>C</p>	<p>-</p>

<i>residents and property owners of the relevant jurisdiction.</i>		
<b>2.2.a</b> The forest owner or manager allows the exercise of <b>tenure</b> and <b>use rights</b> allowable by law or regulation.	C	<p>Evidence of compliance to public access includes field observation of road and trail traffic, deer stands, and other infrastructure for recreation. Interviews with staff indicate a high level of awareness of public access rights and restrictions, rights-of-way, and other use rights.</p> <p>Stakeholders interviewed indicate that counties work collaboratively with different user groups to ensure that these rights are respected while protecting sensitive natural resources.</p>
<b>2.2.b</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	<p>Counties hold public meetings on planned management activities, for which records are maintained and publicly available. Many counties also have a Citizen Advisory Committee that includes representatives of different interests, including recreational user groups and other use rights holders. Where tribal resources or rights exist, each county holds consultations with tribes during the management planning process.</p> <p>Interviews with stakeholders confirmed that the counties regularly meet with these groups to ensure that forest management activities are compatible with recreation and other rights.</p>
<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 <b>disputes</b> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to	C	No significant disputes regarding tenure claims or use rights have occurred in the last year. However, the FME has mechanisms in place to seek the input

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.		of stakeholders and any disputes through open communication, negotiation, and/or mediation.
2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.	C	The DNR and counties maintain written documentation of any significant disputes over tenure and use rights.
<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	FME does not manage any tribally-owned FMUs.
<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	Indian treaty rights, and specifically Lake Superior Bands of Chippewa, were granted reserved rights to hunt, fish, and gather on all ceded lands in eastern Minnesota and northern Wisconsin as part of the treaties of 1837 and 1842. County board meetings and forestry committee meetings in which policies for resource management are set provide opportunities for public input, including representatives of American Indian groups. The counties have established formal policies requiring consultation with tribal nations. The DNR and counties maintain relationships with local tribes and solicit input as needed.
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	County and DNR staff are cognizant of the need to ensure that forest management activities do not adversely affect tribal resources. For example, on public lands within the ceded territory, which include county forests, a free permit process is used to provide for tribal gathering of firewood, boughs, tree bark, lodge poles, marsh hay, and maple syrup. A tribal member must provide his/her tribal ID card

		<p>for this access, which is recorded by the county in which the collection occurs.</p> <p>Additionally, staff are aware of procedures for identifying known archaeological sites and implementing measures to protect them. Maps are protected and not for public use in order to secure locations from artifact hunters and looters. Forest management activities are coordinated with the state archaeologist and Native American tribes. Buffer lines on the ground and on management maps identify the boundary for activity prohibited within the area.</p>
<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></p>	C	-
<p>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.</p>	C	<p>The <i>Timber Sale Handbook</i> requires a check of the cultural database be included for all county forest timber sales and that such information be included on the timber sale narrative. If special sites have been identified on a specific county, then unit-level descriptions often mention that sites have been found or not.</p> <p>FME staff consult with tribes on the location of known archeological sites, as confirmed in interviews with county staff. The Chippewa and Potawatomi Tribes have rights to hunting and gathering on public lands within the ceded territory. Several of these rights are described in treaties and in decisions made during court trials over these rights. The tribes are invited for consultation during management plan writing. The DNR conducts consultations with tribes at broad levels over concerns on certain resources, such as birch bark.</p>
<p><b>3.3.b</b> In consultation with tribal representatives, the forest owner or manager develops measures to protect</p>	C	<p>In consultation with tribes, the counties have demonstrating protecting special sites during timber harvests.</p>

or enhance areas of special significance (see also Criterion 9.1).		
<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>	NA	No traditional knowledge is used in the management of the FMUs.
<b>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b>		
<b>C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b>	C	-
4.1.a. Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry.	C	Employment opportunities at DNR and county forests are non-discriminatory. At counties visited in 2019, state and federal postings were visible at county offices. State hiring processes adhere to strict policies for compliance to equal opportunity, including selecting interview candidates and other measures to ensure fair hiring practices. During interviews, county and DNR staff noted that benefit packages are especially good and include health insurance and pensions.
4.1.b. Forest work is offered in ways that create high quality job opportunities for employees.	C	There is a long average tenure of DNR and county forest staff, which suggests that the quality of work life (compensation, work hours, job security, intangibles, etc.) is desirable. County employees interviewed during the 2019 audit expressed high job satisfaction and ample opportunities for training, including DNR-sponsored programs. A sample of training records in personnel files was reviewed, covering a wide variety of topics including invasive species, Natural Heritage Inventory, chainsaw safety, WisFIRS, pesticide application, archeological site identification, among other subjects.



<p>4.1.c. Forest workers are provided with fair wages.</p>	<p>C</p>	<p>County and DNR jobs are quality positions with competitive compensation packages. County employees interviewed stated that wages are comparable to what could be earned in similar positions in private industry. Benefit packages were viewed as being good.</p> <p>Interviewed operators indicated that bid rates accepted by the counties for purchased wood is comparable to current rates in the wood market.</p>
<p>4.1.d. Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.</p>	<p>C</p>	<p>County and DNR employment practices adhere to federal and state laws for exempt and non-exempt employees. As observed in county offices, OSHA and anti-discrimination posters are posted in publicly-visible places.</p> <p>Timber contracts reviewed include stipulations to adhere to federal and state laws, including equal opportunity and non-discrimination.</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>C</p>	<p>FME distributes bid prospectuses to a comprehensive list of potential bidders, including local operators. The size of timber sales is varied to allow access to a range of local companies.</p>
<p>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.</p>	<p>C</p>	<p>DNR liaisons and county forest staff support a large number and wide range of environmental education activities. For example, DNR staff attend public meetings related to the management of county forests and also provide educational opportunities to the public, such as tours.</p> <p>Educating the public about Wisconsin’s county forests and the public benefits associated with sustainable forest management is a high priority for Wisconsin County Forests Association (WCFA). The quasi-governmental organization represents the forestry interests of the 29 counties in Wisconsin with lands enrolled under Wisconsin’s County Forest Law.</p>
<p>4.1.g. The forest owner or manager participates in local economic</p>	<p>C</p>	<p>FME supports local economic activity by providing access to employment opportunities for local</p>

<p>development and/or civic activities, based on scale of operation and where such opportunities are available.</p>		<p>community members, offering timber for bid, and offering other in-woods forestry contract work.</p> <p>Additionally, county forest and DNR employees reside in small, mid-sized, and large communities throughout Wisconsin and are engaged in civic activities throughout both as private citizens in off hours and as county and DNR representatives during work hours.</p>
<p><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></p>	<p>C</p>	<p>-</p>
<p>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).</p>	<p>C</p>	<p>No serious injuries or fatalities were reported in the last year. Likewise, operators interviewed indicated that no injuries had occurred. Counties reported that there have been no changes in the occupational health and safety regulatory framework in the last year. Accident records for staff are maintained in personnel files, and a sample was reviewed.</p>
<p>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.</p>	<p>C</p>	<p>All employees and contractors were observed using proper PPE during the audit. Contracts reviewed for timber harvests contain safety requirements. Timber contracts reviewed include stipulations to adhere to federal and state laws, including those pertaining to health and safety.</p>
<p>4.2.c. The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p>	<p>C</p>	<p>All loggers interviewed had FISTA training or were also Wisconsin Master Logger certified. Records of contractors' FISTA training were viewed in county files and confirmed in the FISTA database.</p>
<p><b>C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</b></p>	<p>C</p>	<p>-</p>
<p><b>4.3.a</b> Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>	<p>C</p>	<p>Freedom of association is unambiguously guaranteed for all DNR and county employees. Right to organize is guaranteed by US and State of Wisconsin Law. For all employees of contractors, the standard contract requires the contractor to comply</p>

		with all applicable labor laws; as such, freedom of association is ensured.
<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:</p> <ul style="list-style-type: none"> <li>• Archeological sites and sites of cultural, historical and community significance (on and off the FMU);</li> <li>• Public resources, including air, water and food (hunting, fishing, collecting);</li> <li>• Aesthetics;</li> <li>• Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health;</li> <li>• Community economic opportunities;</li> <li>• Other people who may be affected by management operations.</li> </ul> <p>A summary is available to the CB.</p>	C	<p>County forest and DNR staff that were interviewed are aware of likely social impacts of forest management activities. Examples of incorporating the public social impacts into management planning and operations include:</p> <ul style="list-style-type: none"> <li>• Buffers are placed around the historic Native American sites in order to protect artifacts and structures. Any management near such sites is coordinated with the state archaeologist and Native American tribes.</li> <li>• County forests allow camping, hunting, and fishing. Firewood cutting is allowed with a permit. Implementation of Wisconsin BMPs help to protect water quality.</li> <li>• Aesthetic considerations in setting up harvests are common, including aesthetic buffers harvest units.</li> <li>• Among the community goals that county forests provide, recreational opportunities remain important. County forests work closely with recreational user groups such as ATV/UTV, snowmobile, mountain bike, horse riding, and cross-country ski clubs to ensure that ample opportunities for recreation are created while protecting natural resources.</li> <li>• County forests support local economic opportunities by providing employment for local community members, offering timber for bid, and offering other in-woods forestry contract work.</li> </ul>

		<ul style="list-style-type: none"> <li>The county forest program considers people who may be affected by management operations. For example, neighboring landowners are alerted to harvests, tribes are invited to provide input on management planning, and county board meetings are open to the public and invite comments.</li> </ul> <p>The comprehensive land use plan for each county includes a description of the likely social impacts of management activities and how this understanding is incorporated into management planning and operations.</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>	<p>C</p>	<p>County board meetings and forestry committee meetings in which policies for resource management and work plans are set allow for public input. Those meetings are typically held monthly. County forest administrators are available for the public to provide feedback, and in this way they are constantly evaluating social impacts and incorporating them into management. WCFA oversaw the Wisconsin County Forest Practices Study, which evaluated facets of forest management in the state, including social impacts.</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>County board meetings and forestry committee meetings in which policies for resource management and work plans are established allow for public input. Adjacent landowners are contacted in cases when management activities occur near property boundaries or otherwise may affect use rights. County forest administrators are available to the public for people to provide feedback, and in this way they are constantly evaluating social impacts and incorporating them into management.</p>
<p>4.4.d. For <b>public forests</b>, consultation shall include the following components:</p> <ol style="list-style-type: none"> <li>Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes,</li> </ol>	<p>C</p>	<p>The publicly-open county board and forestry committee meetings fulfill this requirement, as well as the administrators being available to the public.</p> <p>The County Forest Law establishes mechanisms for public participation in all planning processes. Annual work plans are open for public comment as</p>

<p>including harvest plans and operational plans;</p> <p>2. 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;</p> <p>3. An accessible and affordable appeals process to planning decisions is available.</p> <p>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>advertised in local newspapers and on each county’s website before management activities take place.</p> <p>Appeals are handled prior to plans becoming finalized to avoid conflicts; however, the public may contact their elected county representative or present information during monthly public meetings to appeal decisions. Draft and final plans are made available in county offices and on each county’s website.</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>-</p>
<p><b>4.5.a</b> The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	<p>C</p>	<p>Through implementation of measures to protect property boundaries and ensure compliance to health and safety laws, the FME avoids negligent actions. Any such cases would be handled through legal staff.</p>
<p><b>4.5.b</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,</p>	<p>C</p>	<p>FME must provide mechanisms for public input on forest management activities per the law that established the program. WCFP maintains communications with the local public and tribes regarding resources of others that may be impacted during management.</p>

demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.		
<b>4.5.c</b> 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.	C	Through interviews with staff, the audit team confirmed that there have been no recent cases of substantiated damage to adjacent lands or permitted use rights.
<b>P5 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.</b>		
<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>	C	-
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.	C	On-the-ground observations and interviews with staff demonstrate that the FME is able to implement its core management activities.
5.1.b. Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	C	While staff levels have fluctuated over time, including a slight reduction now as part of the DNR realignment, the FME has been able to maintain a level of harvesting that is within the AAC and that provides income for operations and counties. Evidence suggests that responses to these short-term financial factors are limited to levels that are consistent with fulfillment of the standard.
<b>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</b>	C	-
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,	C	Through an examination of harvest contracts, interviews with county and DNR employees, and interviews with operators, all loggers and mills were verified as being local. Most harvested material is

<p>guiding services, and other operations that are able to offer services at competitive rates and levels of service.</p>		<p>manufactured into lumber or pulp/paper products locally.</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>Wisconsin has mills capable of using various grades of timber. Silvicultural prescriptions on the observed WCFP harvest sites promoted the development of high-quality stands of hardwood through TSI and shelterwood harvests. Pulp and paper, firewood, and biomass are options for most county lands on other sites. Examples of optimization were observed in pine thinnings through the use of processors so that varying grades of lumber could be obtained through better utilization.</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>C</p>	<p>A wide range of harvest sizes and minimum bid amounts are offered for sale to allow for both small and large businesses to purchase county wood. A review of bid lists verified this practice.</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>-</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>On all harvest sites visited, there was good utilization of harvested forest products. On pine thinnings and aspen regeneration harvests, the use of processors allow for a high level of utilization while spreading slash evenly over the harvest site to retain nutrients onsite.</p>
<p>5.3.b. Harvest practices are managed to protect residual trees and other forest resources, including:</p> <ul style="list-style-type: none"> <li>• soil compaction, <i>rutting</i> and erosion are minimized;</li> <li>• residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected;</li> <li>• damage to NTFPs is minimized during management activities; and</li> </ul>	<p>C</p>	<p>All of the loggers interviewed had FISTA training, which includes training on measures to implement this indicator. No significant damage to the resource was observed. Examples of measures to avoid damage to soil and water resources includes winter logging in wetlands so that compaction is avoided, using timber mats to cross trails and other sensitive areas, minimizing the number of stream crossings, and flagging no-equipment buffers in green tree retention areas and riparian buffers. Damage to residual stands was minimal.</p>

<ul style="list-style-type: none"> <li>techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.</li> </ul>		
<b>C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</b>	C	-
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.	C	As confirmed through interviews, county forest and DNR staff have a high level of knowledge of local uses for forest products and recreation. The DNR has conducted economic analyses of the WCFP. Additionally, each of the counties makes its economic impact publicly available on county websites.
5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.	C	Wisconsin’s Forest Practices Study (WFPS) was used to identify areas where WCFP has opportunities to enhance to diversify its products or services offerings, among other activities to advance forestry and forest practices in the state.
<b>C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</b>	C	-
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 values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.	C	WCFP’s mission includes opportunities for hunting, fishing, and other forms of recreation developed in cooperation with other public agencies and stakeholders. These are mentioned in each county’s CLUP.
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	Evidence observed in the field includes ATV, snowmobile, skiing, mountain biking, and hiking trails. Money from recreation permits is used to manage these resources.



<p><b>C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</b></p>	<p>C</p>	<p>-</p>
<p>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.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> <li>• documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions;</li> <li>• mortality and decay and other factors that affect net growth;</li> <li>• areas reserved from harvest or subject to harvest restrictions to meet other management goals;</li> <li>• silvicultural practices that will be employed on the FMU;</li> <li>• management objectives and desired future conditions.</li> </ul> <p>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.</p>	<p>C</p>	<p>Reconnaissance (recon) of land is a tool utilized in all the county forestry programs in the assessment of geographical, structural, and compositional attributes of existing resources. This field information is stored in the Wisconsin Forest Inventory &amp; Reporting System (WisFIRS) management application. The database is used to analyze existing resources, evaluate management alternatives, and assist in the development and implementation of management plans. Recon is one tool used to assess forest resource information at the property level. All annual forest management activities that are carried out by any program (fish, wildlife, parks, endangered resources, etc.) that alter vegetation in any way (e.g., invasive species treatments, timber stand improvement, site preparation, tree planting, timber sales, and wildlife habitat management) is identified by compartment and stand within the WisFIRS database. Needs listed in the database, in addition to other multi-disciplinary input, is used in determining property budgets and annual work plans.</p> <p>Minor changes to annual harvest rates occur each year when planning is conducted for each county forest. During planning, if harvest intervals or early or late constraints are changed, the calculated annual allowable harvest changes accordingly. If harvest dates are updated on a large amount of the property, then the AAC can also be impacted.</p> <p>Harvest rates are established using area control methods and the data from WisFIRS. County forestry committees and county boards develop budgets annually, during which AAC acres are considered.</p> <p>There been any no major adjustments in the FME’s annual allowable harvest rate. Minor changes to</p>

		<p>AAC occur each year when planning is conducted for each county forest. During planning, if harvest intervals or operating season constraints are changed, then the calculated AAC will change accordingly. Additionally, if harvest dates are updated on a large portion of any one county forest, then the AAC can also be impacted.</p>
<p>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.</p>	<p>C</p>	<p>WCFP measures AAH in acres, and that figure varied from county to county. In sum, the AAH for the FSC-certified counties is 45,000 acres per year.</p> <p>15-year average harvest for the FSC-certified is aligned with this AAH at 45,251 acres. In 2018, FSC-certified counties harvested 696,662 cords of pulpwood and 22,984 MBF of sawlogs on 37,490 acres.</p>
<p>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.</p>	<p>C</p>	<p>WCFP uses standard harvest scheduling established in WisFIRS for each stand type. Future entries are based on ecological goals for the site, species composition, stocking, and past management. A combination of moving harvests forward and delaying harvest is used to ensure a balanced age class distribution over time across the landscape.</p>
<p>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.</p>	<p>C</p>	<p>The only significant commercial operations of NTFPs occur on counties with sphagnum moss and Christmas tree resources. Harvest areas and intervals are established based on data from past years that show how quickly the resource can recover.</p> <p>Other NTFPs are small scale and are controlled and harvest volumes monitored through issuing permits (e.g., Christmas trees, firewood). Permits are also issued to tribal members for gathering of boughs, tree bark, lodge poles, marsh hay, jack pine stumps, and maple syrup.</p>

		None of the NTFPs are sold as FSC-certified.
<p><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></p>		
<p><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 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>	C	-
<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</li> </ol>	C	<p>These topics are covered in each county's comprehensive land use plan. Forest community types and natural disturbance regimes in Wisconsin are described the Silvicultural Guidance.</p> <p>The WisFIRS database has these resources mapped. Counties also use supplemental information such as soil maps, LiDAR data for wetland locations, wildlife action plans, and DNR manuals. An inquiry to the Natural Heritage Inventory (NHI) database is included for each project planned on the county forests. These inquiries and the results were confirmed on the Timber Sale Notice and Cutting Reports reviewed during site visits.</p>

<p>successional stages, and a broad comparison of historic and current conditions.</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 <b>best available information</b>, 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>Impacts to these resources are evaluated when completing a Timber Sale Notice and Cutting Report for each harvest. The forms include the results of evaluations of these resources. Each county's comprehensive land use plan also contains general information on impacts.</p> <p>Items included in the ecological considerations portion of the Timber Sale Notice and Cutting Report include management history, green tree retention, post-harvest regeneration plan, invasive species evaluation, insect/disease concerns, skidding/seasonal restrictions, landscape considerations, wildlife action plan/species of greatest conservation need, results of NHI review, and forest chemical use. Also included on Timber Sale Notice and Cutting Reports are sections on water quality considerations, aesthetic considerations, wildlife considerations, recreation considerations, and resources of special concern (archeological/historical review).</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>Timber Sale Notice and Cutting Reports document the harvest or management prescriptions and ecological considerations.</p> <p>When setting up and implementing harvest units, WCFP uses manuals developed by the Wisconsin DNR: <i>Wisconsin's Forestry Best Management Practices for Water Quality</i> (PUB FR-093-2010), <i>Timber Sale Handbook</i> (No. 2461), <i>Public Forest Lands Handbook</i>, <i>Ecological Landscapes Handbook</i> (No. 2460.5), and <i>Silvicultural Guidance</i>. These manuals help the county forests avoid negative impacts and meet ecological objectives of management. The Kotar Habitat Classification System is used to assist in making ecological-based harvest plans.</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>C</p>	<p>Each timber sale is posted in a local newspaper and many are posted on county websites prior to the sale (typically at least 30 days). Confidential portions of the timber sale planning documents, including information on RTE species, sensitive habitats, and archaeological sites, is maintained in a confidential portion of the file and is not available to the general public.</p> <p>Management plans that include broad overviews of 6.1.a are available online and by request. Public input is sought on these drafts. Annual work plans are made available to the public prior to finalization, and any relevant comments received are responded to during public meetings.</p> <p>All final management planning documents are available to the public in county offices, upon request, and many are also posted on county websites.</p>
<p><b>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (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>C</p>	<p>-</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>C</p>	<p>The Wisconsin NHI database is consulted prior to all forest management activities, and the results are documents in Timber Sale Notice and Cutting Reports. Foresters work in consultation with DNR Wildlife and NHC staff to address any occurrences in order to ensure protection. Additional site surveys for species often conduct additional site surveys for species if the NHI database indicates the need. Sites visited during the audit included protection</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>		<p>measures in place for RTE species to avoid the risk of impacts of forest management activities.</p>
<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>	<p>C</p>	
<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>	<p>C</p>	<p>The US Fish and Wildlife Service has developed statewide Habitat Conservation Plans for several species (e.g., Karner Blue Butterfly). Funding of is provided to county forests by the DNR to perform habitat improvement work, which can be used for game or non-game species.</p>
<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>	<p>C</p>	<p>Activities that may impact RTE species may be conducted under the authority of a broad or site-specific incidental take permit as approved by the DNR. Sites visited included protection measures in place for RTE species to avoid the risk of impacts of forest management activities.</p>
<p><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</b></p>	<p>C</p>	<p>-</p>

<p><b>diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</b></p>		
<p><b>C6.3.a. Landscape-scale indicators</b></p>		
<p>6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented <b>successional</b> 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.</p>	<p>C</p>	<p>Assessments of under-represented, naturally-occurring successional stages occur during comprehensive land use planning processes and annual reconnaissance surveys. Specific FMU goals for management of these areas are described in each county’s comprehensive land use plan and/or in annual work plans. Some of these areas are considered as HCV.</p>
<p>6.3.a.2. When a <b>rare ecological community</b> 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, <b>conservation zones</b> and/or <b>protected areas</b> are established where warranted.</p>	<p>C</p>	<p>Some of the counties and sites visited during the 2019 audit include ecosystems which not only are rare but also support RTE species. Common modifications included no-entry buffer strips and green tree retention areas.</p>
<p>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.</p> <p>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</p>	<p>C</p>	<p>Relict old growth stands (Type 1) are typed as reserved; there is no active management except for protection from invasive species. In managed old growth stands, any forest management is conducted primarily to maintain or enhance old growth characteristics. Only one of these stands has a planned treatment and that is not until 2099.</p>

<p>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).</p> <p>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).</p> <p>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).</p> <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> </ol>		
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<p>5. Conservation zones representative of old growth stands are established.</p> <p>6. Landscape level considerations are addressed.</p> <p>7. Rare species are protected.</p>		
<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>	<p>C</p>	<p>DNR wildlife biologists work with liaison foresters and county forest administrators to plan and carry out projects for wildlife habitat improvement.</p> <p>Some recent examples of efforts to benefit wildlife include the Young Forest Initiative, barrens restoration and management, grouse/woodcock habitat enhancement, and turkey habitat enhancement. Projects are often conducted in partnership with other groups including Ruffed Grouse Society, National Wild Turkey Federation, and US Fish and Wildlife Service.</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> <ul 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> </ul>	<p>C</p>	<p>Forest management activities regularly occur near riparian and other wetland areas. <i>Wisconsin's Forestry Best Management Practices for Water Quality</i> are followed when conducting management near these areas. BMP, soil disturbance, and ephemeral pond monitoring projects are conducted on county forest lands by the DNR forest hydrologist.</p>
<p><b>Stand-scale Indicators</b></p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of</p>	<p>C</p>	<p>The harvests observed in 2019 are consistent the natural disturbance regimes that would maintain conditions for the species groups found on those sites. For example, aspen regeneration harvests mimic wind and fire events that would naturally</p>

<p>occurrence similar to those that would naturally occur on the site.</p>		<p>keep aspen on the landscape. Oak thinnings and northern hardwood selections harvests are consistent with wind throw and natural mortality events that would promote the growth of healthy trees.</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>C</p>	<p>When planting is required, seed sources predominantly come from areas around the state’s nurseries. Some counties send local seed sources to out-of-state nurseries to be container grown. In some cases, local seed sources are not available for use; in those cases, the next seed source is utilized. FME provided records of seed sources for each county that planted in the last year.</p>
<p>6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in 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>C</p>	<p>Completed harvests observed contained snags left, as well as some legacy trees such as conifers within aspen regeneration harvests. Also observed were retained den and cavity trees.</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>C</p>	<p>When even-aged harvests are conducted, guidelines for green tree retention areas, biomass harvesting, coarse woody debris are followed, as confirmed in field observation. These guidelines are intended to represent a proportion and configuration that is consistent with the characteristic natural disturbance regime.</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>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,</li> </ol>	<p>C</p>	<p>There are no additional restrictions on even-aged management for the Lake States-Central Hardwoods region.</p>

<p>including for sensitive and rare species.</p> <p>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</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 species and ecosystems;</li> <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>	C	<p>The threat of invasive species varies between counties, and each of the counties visited in 2019 have active invasive species control programs.</p> <p>In the last year, chemical treatments for invasives have occurred in Ashland, Barron, Bayfield, Chippewa, Clark, Douglas, Jackson, Lincoln, Oconto, Oneida, Price, and Washburn Counties. Mechanical treatment also was implemented in these and other counties. Invasive species populations are monitored in follow up visits and re-treated when necessary.</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>	C	<p>Most prescribed burns in Wisconsin are conducted for wildlife habitat purposes. Counties work with the DNR to complete burn plans and coordinate burns on county forests. Barrens management, red oak regeneration, and suppressing woody vegetation in grasslands are common objectives for prescribed fire.</p>
<p><b>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their</b></p>	C	-

<p><b>natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</b></p>		
<p><b>6.4.a</b> 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>C</p>	<p>The RSA assessment was completed by Wisconsin DNR, which conducted an ecosystem-wide assessment for the entire state followed by a gap analysis. WDNR identified potential RSA areas via aerial photos and then ground-truthed the sites.</p>
<p><b>6.4.b</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>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p>	<p>C</p>	<p>WDNR recommended potential RSAs to county forests. Nearly all recommended RSAs were classified as RSAs; however, the counties refined the on-the-ground analysis by identifying RSA boundaries. RSAs include SNAs and some HCVMs that overlap with RSAs.</p>
<p><b>6.4.c</b> Management activities within RSAs are limited to low impact activities compatible with the protected RSA</p>	<p>C</p>	<p>Barrens, such as the Bauer Brockway Barrens in Jackson County, are managed through fire and management activities designed to act as a surrogate for fire when it cannot be used. The SNA</p>

<p>objectives, except under the following circumstances:</p> <p>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</p> <p>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.</p>		<p>website outlines activities that are permitted or recommended to maintain them, including timber harvests when these are compatible with management objectives.</p>
<p><b>6.4.d</b> 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.</p>	<p>C</p>	<p>NHI data is continually updated with new information, which is then used to classify any new SNAs as indicated by the size and scope of the new finding.</p>
<p><b>6.4.e</b> 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.</p>	<p>C</p>	<p>This indicator is met through the establishment of RSAs, HCVs, riparian buffers, and a diversity of seral stages across the landscape.</p>
<p><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></p>	<p>C</p>	<p>-</p>
<p>6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	<p>C</p>	<p>WCFP uses BMPs developed by the Wisconsin DNR (<i>Wisconsin's Forestry Best Management Practices for Water Quality, PUB FR-093-2010</i>). Per the DNR <i>Timber Sale Handbook</i> (No. 2461), BMPs are mandatory on those county forests that are certified to the FSC FM Standard.</p>
<p>6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that</p>	<p>C</p>	<p>All sites evaluated by the 2019 audit team showed the implementation of BMPs, including properly</p>

<p>address components of the Criterion where the operation takes place.</p>		<p>constructed water bars, water crossings, and slashed trails.</p>
<p>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:</p> <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> <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>C</p>	<p>Wisconsin BMPs form the base for conformance to this indicator. The 2019 audit team saw good compliance to BMPs during the audit: slash was evenly distributed on an aspen regen harvests to encourage nutrient retention; there was no sign of equipment or logging slash in vernal pools; disturbance of topsoil was minimal; water bars were installed properly and functioning correctly; and water crossings for appropriately designed.</p>

<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>	<p>C</p>	<p>Counties follow Wisconsin BMPs, which address many of these issues. The road systems observed were in good condition with permanent roads crowned to shed precipitation and rolling dips. Logging trails had well-constructed waterbars. Harvest areas were designed to minimize road infrastructure, and crossing of streams was limited. Crossings that were observed were well constructed with no erosion evident.</p>
<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</p>	<p>C</p>	<p>Riparian Management Zones (RMZs) are described in Wisconsin’s BMP manual. The manual includes the application of BMPs in wetland environments, including recommended vegetative buffer widths. The BMP manual includes examples of RMZ widths</p>



<p>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 widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>		<p>for common situations, such as even-aged aspen harvests.</p>
<p>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</p>	<p>C</p>	<p>All RMZ buffer widths observed during the 2019 audit were consistent with those recommended by Wisconsin’s BMP manual.</p>

<p>expert in aquatic ecology or closely related field.</p>		
<p>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><i>aquatic habitat</i></b>. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	<p>C</p>	<p>Wisconsin’s BMP manual covers stream crossings with specific examples. The recommended specifications described in the manual are in line with this indicator. Field sites visited in 2019 showed adherence with BMPs. No impediments to aquatic organisms were observed. Timber mats and/or woody debris are typically used to cross sensitive areas, and examples of both were observed.</p>
<p>6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	<p>C</p>	<p>BMPs are designed with compatible multiple uses in mind. Recreation trails such as ATV/UTV and mountain bike trails are constructed to minimize negative impacts to soils, water, plants, wildlife, and wildlife habitats.</p>
<p>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.</p>	<p>C</p>	<p>No grazing with domesticated animals is permitted on county forests.</p>
<p><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</b></p>	<p>C</p>	<p>-</p>

<p><b>minimize health and environmental risks.</b></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 includes a map of the treatment area.</p> <p>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>C</p>	<p>Review of chemical application plans and pesticide applicator license records demonstrate compliance with this indicator.</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>	<p>C</p>	<p>-</p>
<p><b>6.7.a</b> The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills.</p>	<p>C</p>	<p>Loggers, County staff, and WIDNR staff interviewed stated that FISTA training includes procedures for using spill kits. Spill kits were located onsite at active operations.</p>
<p><b>6.7.b</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>	<p>C</p>	<p>No spills were reported on any of the county properties visited in 2019. Logging equipment observed was in working conditions and with no evidence of persistent leaks.</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 offsite location for disposal. There is no</p>	<p>C</p>	<p>Fuels and other hazardous materials are stored in landing areas observed on active logging sites, which are well away from sensitive areas. No leaks were observed on any of the equipment onsite during the field audit.</p>

evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.		
<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>	C	-
<b>6.8.a</b> 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 noninvasive and are safe for native species.	C	Although biological control agents may occasionally be recommended for use in the control of invasive plants and insects per State and federal regulations, county staff do not have the authority to release them.  The only biological control agent used on the FMUs sampled his year was for control of knapweed on Bayfield County Forest.
<b>6.8.b</b> If biological control agents are used, they are applied by trained workers using proper equipment.	C	Only WDNR or other state employees that have been trained in application methods release them (primarily insects or aerial bacterial sprays). County are is not authorized to release biological control agents.
<b>6.8.c</b> If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and 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.	C	The use of biocontrol agents, such as the beetles used for knapweed control on Bayfield County Forest, are documents and monitored in accordance with state and federal law. The beetles are not considered to be invasive.
<b>6.8.d</b> Genetically Modified Organisms (GMOs) are not used for any purpose	C	No use of GMOs was reported by County staff. All seed sources from nurseries are documented and traceable to the provenance or collection area.

<p><b>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	<p>C</p>	<p>-</p>
<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>	<p>C</p>	<p>With the exception of limited biocontrol agents such as the beetles described in Indicator 6.8.c and erosion control plant species, exotic species are generally not used on the FMUs for commercial or management purposes.</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>	<p>C</p>	<p><i>Wisconsin Forestry Best Management Practices for Water Quality</i> (Appendix D) lists non-native species suitable for cover crops for short term erosion control. <i>Wisconsin’s Forestry Best Management Practices for Invasive Species Field Manual</i> (Appendix H) lists species recommended for revegetation.</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>	<p>C</p>	<p><i>Wisconsin DNR analyzed the risk of using non-native species listed in these BMP manuals. County staff follow the guidelines from this evaluation, which indicated low risk of invasiveness and low risk of establishment of a seed bank.</i></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>	<p>C</p>	<p>-</p>
<p><b>6.10.a</b> 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</p>	<p>C</p>	<p>Documentation of any forests to non-forest use is maintained by county forest administrators. WCFP consists of natural forests (including planted natural forests) and no FSC plantations. Counties have not conducted any conversion of forestland to non-forest use.</p>

<p>to be conformed with for conversion to be allowed).</p>		<p>In the past, a parking lot in Juneau County in a then-recently acquired parcel, but was installed in an area that was cleared by the previous owner of the property. The project included the removal of a small number of trees; however, the removal of old housing structures from the site allowed for the recovery of some forest.</p>
<p><b>6.10.b</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>	<p>C</p>	<p>No conversion has taken place. For the small parking lot in Juneau County described in Indicator 6.10.a, the area did not meet any of the county’s or WDNR’s HCV types.</p>
<p><b>6.10.c</b> 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>	<p>C</p>	<p>The conversion in Juneau County for a parking lot described in Indicator 6.10.a allowed for non-motorized recreation in a forest that had been harvested several times over the years. Recreation allows the forest to grow while providing funding for maintenance and access for monitoring, as well as providing public recreation values. Additionally, the property includes a four-mile long riparian area that was protected.</p>
<p><b>6.10.d</b> 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>No conversion of natural/semi-natural stands to non-forest use was not reported or observed during the 2019 assessment.</p>
<p><b>6.10.e</b> 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>The property in Juneau County described in Indicator 6.10.a is under a land management plan developed in cooperation with The Conservation Fund, which helped acquire the property. A combination of recreation, forest management, and protected areas have been created for the property. The development of some areas of later successional stands through passive management, management of oak-hickory, and riparian lowland hardwood forests with harvests is compatible with achieving landscape biodiversity.</p>
<p><b>6.10.f</b> Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion</p>	<p>NA</p>	<p>No OGM rights are reported to be in exercise currently. Counties usually seek to acquire subsurface rights when acquiring new lands. OGM</p>

<p>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>rights may expire in many areas when the rights holder does not exercise the rights within 20 years.</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. 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></p>	<p>C</p>	<p>-</p>

<p><b>h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</b></p> <p><b>i) Description and justification of harvesting techniques and equipment to be used.</b></p>		
<p><b>7.1.a</b> 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>	C	<p>County-level FMPs include chapters on statutory authority and ownership. County-level FMPs cite Wisconsin Statutes 28.10 and 28.11, the legislation that establishes the authority for establishment of, administration of, and management of county forests. The <i>DNR Public Forest Lands Handbook</i> provides a comprehensive overview of these statutes.</p>
<p><b>7.1.b</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>	C	<p>Each county’s CLUP describes the history of the forest in each county, the natural features of the forest, and the relevant biological communities and associated resources. Current forest types and age classes are presented in on integrated resource management.</p>
<p><b>7.1.c</b> 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>	C	<p>FMPs are complemented by the <i>Wisconsin Forest Management Guidelines (WFMG)</i>, published by DNR and revised in 2018. This document presents a history of forest conditions and natural disturbance regimes. Objectives are clearly presented in FMPs, and future conditions and activities are presented in WisFIRS models, AWP, and planning meeting minutes. There is some variation among plans in the presentation of desired future conditions.</p>
<p><b>7.1.d</b> The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.</p>	C	<p>FMPs describe the landscape of each county in, and are complemented by a narrative (Form 2460) prepared for all timber sales. To varying degrees, examples of Form 2460 examined had relevant descriptions of the surrounding landscape. FMP also includes reference to landscape management and habitat elements.</p>
<p><b>7.1.e</b> The management plan includes a description of the following resources and outlines activities to conserve</p>	C	<p>FMPs include all of the elements listed in this indicator. Form 2460 and revised appendices of the plans also contain lists of RTE species. Each plan</p>



<p>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> </ul> <p>Other special management areas.</p>		<p>reviewed clearly identified HCVFs protected and managed in cooperation with the State Natural Areas Program.</p>
<p><b>7.1.f</b> 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).</p>	<p>C</p>	<p>Each county plan includes lists and management recommendations for invasive species. This is supplemented by an <i>Invasive Species BMP Manual</i> prepared by the Wisconsin Council on Forestry. Invasive species are also addressed on Form 2460 prior to implementation of timber sales.</p>
<p><b>7.1.g</b> 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).</p>	<p>C</p>	<p>County plans address control of forest pests and pathogens. The <i>WDNR Public Forest Lands Handbook 2460.5</i> contains guidance on insects and diseases, with particular emphasis on how to use WisFIRS to develop management options.</p>
<p><b>7.1.h</b> If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.</p>	<p>C</p>	<p>County forests use chemicals sparingly, especially for silviculture, and county management plans mostly address applicable laws and regulations on their use. Each county FMP includes an integrated pest management program, and the WFMG addresses pesticide use. A specific plan is required for each application, approved by the County Forest Administrator and detailed in either on Form 2460 or a separate chemical use form.</p>
<p><b>7.1.i</b> If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.</p>	<p>C</p>	<p>Similar to chemical use, the CLUP includes general reference to biological controls, if any. A specific plan would be approved, likely requiring and environmental assessment.</p>

<p><b>7.1.j</b> 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> <p>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).</p>	<p>C</p>	<p>Social impacts are presented mostly in county plans, which include sections on treaty rights, cultural features, administration, training, ordinances, etc. Additional information is found in appendices. WCFA maintains information on socioeconomic impacts of the FME on its website, and was a part of the Wisconsin’s Forest Practices Study (WFPS) to examine the impacts of Wisconsin’s forestry practices. All of the social impact elements in this indicator are included in the documents that comprise county management plans.</p>
<p><b>7.1.k</b> The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</p>	<p>C</p>	<p>County FMPs and AWP plans address the transportation network. BMP manuals provide descriptions of common methods of maintaining forest roads and trails.</p>
<p><b>7.1.l</b> 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>C</p>	<p>General references are contained in county plans. The <i>DNR Silviculture Guidance</i> is the primary reference for this element of the plan. Specific silviculture plans are part of Form 2460 and discussed in AWP.</p>
<p><b>7.1.m</b> The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.</p>	<p>C</p>	<p>The degree to which harvest rate calculations are presented in county plans varies, but the <i>Public Lands Handbook</i> is the primary reference for harvest rate calculations along with Help menus in WisFIRS and reoccurring training. Species selection for harvest is a product of annual updates from forest recon and the programming of the WisFIRS system.</p>

<p><b>7.1.n</b> The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.</p>	<p>C</p>	<p>Most of the required monitoring is part of the forest compartment reconnaissance (recon), described in detail in the <i>WDNR Public Forest Lands Handbook 2460.5</i>.</p>
<p><b>7.1.o</b> 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>C</p>	<p>All relevant maps are included WCFP plans. Maps are also available through WisFIRS and GIS.</p>
<p><b>7.1.p</b> 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>C</p>	<p>Although there are general descriptions of harvesting equipment in WFMG, specific requirements for machinery or special provisions for harvesting are included in prescriptions for each harvest and described on Form 2460. Most harvesting on WCFP is done with processors and forwarders, generally considered to have minimal impacts on resources.</p>
<p><b>7.1.q</b> 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>C</p>	<p>All elements of this indicator are addressed routinely in the harvest prescription and narrative completed before advertising timber sales. This is a multi-disciplinary process, usually involving DNR personnel with expertise in wildlife, fisheries, water, cultural features, etc. See Form 2460 and the AWP.</p> <p>Timber harvest planning is robust and well-documented, fulfilling the requirements of this and related indicators in this standard. As part of the harvest planning, approval and recordkeeping process a Timber Sale Notice and Cutting Report is prepared for all sales. The narrative portion includes the following sections:</p> <ul style="list-style-type: none"> <li>a. General Sale Description</li> <li>b Ecological Considerations, including Management History, Silvicultural Systems, Green Tree Retention, Post-Harvest Regeneration Plan, Invasive Species Evaluation, Insect/Disease Concerns, Skidding/Seasonal Restrictions, Wildlife Action Plan/ Species of Greatest Conservation Need,</li> </ul>

		<p>Conservation Opportunity Area (COA), Results of NHI, and Comments</p> <p>c. Water Quality Considerations</p> <p>d. Aesthetic Considerations</p> <p>e. Wildlife Considerations, including Snag, Den and Mast Tree Retention, Game Openings, and Comments</p> <p>f. Recreation Considerations</p> <p>g. Resources of Special Concern Considerations (Archeological / Historical Review)</p>
7.1.r The management plan describes the stakeholder consultation process.	C	WCFP plans describes elements of stakeholder consultation, but this is addressed more specifically by the state statutes requiring environmental assessments and public oversight of county plans.
<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	<p>County forest managers are directed to develop new comprehensive land use plans every 15 years by Wisconsin Statute 28.11(5)(a), although the plans are living documents and updated frequently. AWP's follow the entry of new data from forest reconnaissance, and annual WisFIRS updates produce new 15-year harvest projections.</p> <p>The planning documents that guide management are updated on an as needed basis, in many cases at least every 10 years. Such documents include the <i>Silvicultural Handbook</i>, <i>Public Forest Lands Handbook</i>, <i>2460 Cutting Notices</i>, <i>Ecological Landscapes</i>, and <i>Annual Work Plans</i> for each county. Assuming that these planning documents continue to play important roles in guiding management of Wisconsin's County Forests, the 15-year update schedule for the County Forest Comprehensive Land Use Plans is acceptable.</p>

		Certain components of management planning documents, such as the DNR Silviculture Guidance, are updated at least annually due to the results of scientific and technical information.
<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	All operators interviewed in 2019 were FISTA-trained; training records were reviewed. Harvest maps were onsite during active operations.  As confirmed in interviews with county and DNR staff and operators, pre-work meetings are conducted immediately prior to harvesting activity; a sample of pre-sale checklists was reviewed. Additionally, interviews with operators and a review of written inspection forms confirmed regular visits by county foresters during operations. Operators stated that county foresters are accessible if questions arise and that there is regular communication.
<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>	C	-
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 County forest comprehensive land use plans are posted on most County Forestry Department websites. Plans are also available at publicly available county forest offices. Other components of the management plan are also 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	C	Both draft and final plans are made available for public input. WCFP management plans, annual work plans, and annual reports are posted on county website in most counties, and are available in other formats upon request.

<p>modify the plans to ensure compliance with this Standard.</p>		<p>Monthly meetings with Forestry and Recreation Committees in each county are open to the public. (Note: all counties have such a committee, but committee names vary).</p>
<p><b>P8 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></p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p><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 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>C</p>	<p>-</p>
<p><b>8.1.a</b> 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>	<p>C</p>	<p>Most of the required monitoring is part of the forest compartment reconnaissance (recon), described in detail in the <i>WDNR Public Forest Lands Handbook</i>. WisFIRS provides a system for recording monitoring information per DNR-established protocols. Other elements of the monitoring system include field manuals for forest inventory (reconnaissance), and studies commissioned by DNR, the legislature or other bodies. Monitoring strategy is described <i>WDNR Public Forest Lands Handbook</i> and recorded in WisFIRS.</p>
<p><b>8.2. 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</b></p>	<p>C</p>	<p>-</p>

<p><b>harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</b></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>	<p>C</p>	<p>WisFIRS is a comprehensive system for guiding the reconnaissance and inventory of forest compartments as well as for scheduling harvest and other management options of stands. All of the elements listed in this indicator are included in the <i>Wisconsin DNR Public Forest Lands Handbook</i> (No. 2460.5).</p>
<p>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.</p>	<p>C</p>	<p>No significant, unanticipated removal or loss or increased vulnerability of forest resources has occurred in the last year in the counties sampled. If such a loss were to occur, data would be gathered by a special reconnaissance inventory and entered into WisFIRS before annual updates of harvest scheduling.</p>
<p>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.</p>	<p>C</p>	<p>Harvest volumes are entered into WisFIRS before annual harvest scheduling. Records for harvest of firewood and other non-certified NTFPs, including by members of tribes. Harvest data are manually entered into WisFIRS, as is data from the Timber Sale Notice &amp; Cutting Reports. In this respect, WisFIRS is the central repository and mechanism for monitoring the volume harvested timber and non-certified NTFPs over time.</p>
<p>8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> <li>1) Rare, threatened and endangered species and/or their <b>habitats</b>;</li> <li>2) Common and rare plant communities and/or habitat;</li> <li>3) Location, presence and abundance of invasive species;</li> <li>4) Condition of protected areas, set-asides and buffer zones;</li> <li>5) High Conservation Value</li> </ol>	<p>C</p>	<p>The DNR conducts wildlife surveys on county forests: nesting bird surveys, grouse transects, summer deer observations, winter track surveys, bear surveys, and a variety of other wildlife and plant monitoring.</p> <p>The NHI database is updated based on the results of statewide inventories, data generated by NHI cooperators at universities, nonprofit organizations, federal and state agencies and individuals; and published literature and reports submitted to the DNR.</p>

<p>Forests (see Criterion 9.4).</p>		<p>Foresters are trained to assess sites for invasive plants during routine forest reconnaissance. Invasives are on the recon datasheet to allow for retention of this information. Several counties participate in Cooperative Weed Management Associations. Additionally, the DNR also has a system for gathering invasives information (aquatic, wetland, and terrestrial) from the general public.</p> <p>Forest health monitoring, including gypsy moth and EAB surveys, occurs at the state level. During routine forest reconnaissance, foresters are trained to assess sites for invasives. Some counties locate incidents of invasive species detections via GPS for use when controlling and monitoring.</p> <p>As part of monitoring active harvest sites, as well as closing out such sites, county foresters ensure that protected areas, set-asides, and buffer zones are implemented according to the prescription. Notes from visits to active sites were reviewed, as were harvest close-out checklists.</p> <p>HCVs are monitored regularly, which was verified through document review and interviews with county staff.</p>
<p>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.</p>	<p>C</p>	<p>In addition to regular monitoring of active harvests and close-out, BMP monitoring for water quality, soil disturbance monitoring, and vernal pond monitoring occurs. Examples of timber sale inspection reports and checklists for sites visited were reviewed.</p> <p>A report produced in February 2016 by the Forest Stewards Guild, <i>Wisconsin Forest Practices and Harvesting Constraints Assessment</i>, evaluates the collective impact of constraints (BMPs, etc.) on forest management and ecological consequences of those constraints. The report found “that overall, guidelines, best practices, and other constraints intended to protect forest resources have positive</p>



		effects on forest composition and structure and in protecting forest productivity.” This suggests that harvest prescriptions and guidelines are effective in minimizing environmental impacts of site disturbing operations associated with active forest management.
8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	WCFP requires annual reports and annual work plans for each county. These annual plans routinely include information on the system of forest roads. <i>Wisconsin’s Forestry Best Management Practices for Water Quality</i> includes the need for inspection at regular intervals for active roads and inspection of inactive roads. County staff interviewed indicated that their regular presence in the forest is an important mechanism for monitoring road conditions. Any problems noted by staff are promptly reported to the county administrator.
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).	C	With county board meetings being open to the public and most documents available for public review, the county administrators are continually aware of relevant socioeconomic issues. They often receive stakeholder comments and respond to those comments. Individual county comprehensive land use plans, as well as the WCFA website, contain monitoring information.
8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.	C	Meeting minutes with the public and Citizen Advisory Councils serve as a record of stakeholder interaction.
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	Communication with tribal representatives is ongoing, assuring that any opportunities for joint monitoring of cultural sites are made available to tribes.
8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	Quarterly and annual accomplishment reports show progress throughout the year for various work goals (timber sale establishment, reforestation, etc.). Timber sale inspections constitute monitoring at harvest sale level.

<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>County forests use a trip ticket system for tracking FSC-certified products. Tickets have three parts: (1) when a load leaves the landing, one part is deposited in a lockbox on site.; (2) when delivered to the mill, a second ticket is maintained by the mill; and (3) and the third is returned to the county, along with mill weight or tally. See COC indicators for FMEs conformance table.</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>See Indicator 8.3.a above and COC indicators for FMEs conformance table.</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>-</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>Annual work plans detail current activities to be carried out, while annual reports include a review of implemented activities. AWP are based on management objectives detailed in the CLUPs and field data available in WisFIRS for classified stands. Any stands that have not been harvested are included as part of the next year's annual allowable harvest or delayed until the stands are ready for harvest.</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</p>	<p>C</p>	<p>In 2019, significant deviations from management plans or guidelines were not reported. Each county's CLUP references monitoring and monitoring results. WCFP published the <i>Wisconsin Forest Practices and Harvesting Constraints Assessment</i> published in 2016. This publication provides an overview of how forestry practices as a whole in the state are affecting environmental and socioeconomic values. The report does not indicate that any state or</p>

<p>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>county entities are failing to meet objectives; however, it does includes recommendations for forest managers to consider based on a literature review and analysis of field data.</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>-</p>
<p><b>8.5.a</b> 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>Annual reports and work plans present summaries of monitoring and are usually available on county web sites, or by request in offices. The public also is welcome to visit each county forest administrator’s office and request monitoring information. Additional monitoring information is available through WCFA.</p>
<p><b>P9 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> <ul style="list-style-type: none"> <li><b>a) 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</b></li> <li><b>b) Forest areas that are in or contain rare, threatened or endangered ecosystems</b></li> <li><b>c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)</b></li> <li><b>d) 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).</b></li> </ul> <p><b>Examples of forest areas that <i>may have</i> high conservation value attributes include, but are not limited to:</b></p>		

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.*

<p><i>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.</i></p> <p><i>Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.</i></p>		
<p><b>C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</b></p>	C	-
<p><b>9.1.a</b> 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>FME consults various WDNR sources, such as NHI data and plant community mapping information. FME utilizes the experience and expertise of WDNR staff on the presence of RTE species and communities (e.g., State Natural Areas). The <i>WDNR Timber Sale Handbook</i> contains codes that are used to denote community types that qualify as HCVF. County administrators maintain spreadsheets with all HCVs by the six types per county. WDNR maintains a crosswalk that compares state-level terminology to HCV types.</p>
<p><b>9.1.b</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>	C	<p>The HCVF assessment is conducted in consultation with Wisconsin DNR. In that assessment, many experts, community members, and specialists are consulted during the process. Records are included in management plans, annual work plans, and county meeting minutes.</p>
<p><b>9.1.c</b> 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>This is available in the management plans (CLUP) for the counties that were visited.</p>
<p><b>C9.2. The consultative portion of the certification process must place emphasis on the identified</b></p>	C	-

<b>conservation attributes, and options for the maintenance thereof.</b>		
<b>9.2.a</b> 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.	C	Wisconsin DNR and external stakeholders are consulted to determine HCVF locations and their attributes. Records are included in management plans, annual work plans, and county meeting minutes.
<b>9.2.b</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.	C	County forest management planning documents regarding HCVF classification are open to public review through public meetings, county websites, and the Citizen Advisory Committee. Records are included in management plans, annual work plans, and county meeting minutes.
<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>	C	-
<b>9.3.a</b> 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.	C	Each HCVF is identified in the Master Plan (CLUP) and a written description along with management objectives is provided.
<b>9.3.b</b> All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	C	The counties work with Wisconsin DNR to determine and to apply the appropriate management activities that should occur in each HCVF. These include methods to protect species habitat characteristics (e.g., nest sites) or to maintain rare habitats, such as

		by burning, as described in the CLUP and annual work plans.
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	No HCVs that cross ownership boundaries were observed or reported in the 2019 audit.
<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>	C	
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.	C	Periodic reconnaissance is conducted updating and targeted monitoring visits to some HCVFs each year as needed. HCV areas mostly undergo passive management. Interviews with staff indicate that these are visited periodically to ensure that there is little to no visible anthropogenic disturbance. For example, Gobbler Lake State Natural Area is annually surveyed for invasive species. HCVs within harvest units are primarily in sensitive areas that are identified during pre-harvest reconnaissance and monitored during post-harvest close-out evaluations to ensure effective protection measures.
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.	C	According to FME staff and external stakeholders, no increasing risks to HCVs have been detected.
<p><b>P10 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>This principle is not applicable for the FME.</p>		

## Appendix 7 – Chain of Custody Indicators for FMEs Conformance Table

REQUIREMENT	C/NC	COMMENT / CAR
<b>1. Quality Management</b>		
1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.	C	The COC administrator is the certificate manager for the counties.
1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	Records of FSC-related COC activities are kept for at least 5 years, per review of records and interviews with FME staff.
1.3 The FME shall define its forest gate(s) (check all that apply): <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i>		<p><b>Stump</b>  <input checked="" type="checkbox"/> <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.</i></p> <p><b>On-site concentration yard</b>  <input type="checkbox"/> <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p><b>Off-site Mill / Log Yard</b>  <input type="checkbox"/> <i>Transfer of ownership occurs when certified-product is unloaded at purchaser’s facility.</i></p> <p><b>Auction house / Brokerage</b>  <input type="checkbox"/> <i>Transfer of ownership occurs at a government-run or private auction house / brokerage.</i></p> <p><b>Lump-sum sale / Per Unit / Pre-Paid Agreement</b>  <input checked="" type="checkbox"/> <i>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 before harvesting begins. Similar to a per-unit sale.</i></p> <p><b>Log landing</b>  <input type="checkbox"/> <i>Transfer of ownership of certified-product occurs at landing / yarding areas.</i></p> <p><input type="checkbox"/> <b>Other (Please describe):</b></p>



<p>1.4 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>The legal transfer point is defined within each timber sale contract. For field-scaled sales, specification that logs cannot be transferred prior to scaling is included in specific language. Transfer of ownership in those cases occurs either upon scaling or approval from county forest staff.</p>
<p>1.5 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>No processing occurs prior to legal transfer of ownership.</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>Most harvested timber is transferred upon severance from the stump (stumpage sales) or prior to harvest (lump-sum sales). Haul tickets may be used in stumpage sales to track harvested materials once they leave the site, but ownership remains with the buyer upon ownership transfer. In lump-sum sales, the buyer is responsible for any COC requirements. For field-scaled sales, in which logs are scaled at the landing prior to transport, county and/or DNR staff scale each log and mark it with paint. This lets the buyer know that the item is approved to transport.</p>
<p>2.2 The FME shall maintain records of quantities / volumes of FSC-certified product(s).</p>	<p>C</p>	<p>County staff tally and track harvest timber volumes. Information is entered into WisFIRS for comparison of pre-harvest and post-harvest volume information. Scale tickets are retained for each load.</p>
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> <li>a) name and contact details of the organization;</li> <li>b) name and address of the customer;</li> <li>c) date when the document was issued;</li> <li>d) description of the product;</li> <li>e) quantity of the products sold;</li> <li>f) the organization’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code;</li> </ul>	<p>C</p>	<p>Current county forest timber sale contracts and haul tickets are maintained by county forest administrators. Whenever changes are made relative to forest certification information, the WCFP manager is consulted. Contracts contain the correct certificate code and FSC claim, as well as elements a)-e). Samples of timber sale contracts and load tickets were examined.</p>

<p>g) clear indication of the FSC claim for each product item or the total products as follows:</p> <ul style="list-style-type: none"> <li>i. the claim “FSC 100%” for products from FSC 100% product groups;</li> <li>ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups.</li> </ul> <p>h) If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other.</p>		
<p>2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product.</p> <p><b>Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2</b></p>	<p>C</p>	<p>Load tickets examined have elements a)-g) of 2.3 as stated above.</p>

<p>2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company’s webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria:</p> <ul style="list-style-type: none"> <li>a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document;</li> <li>b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence;</li> <li>c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence.</li> </ul> <p><i>FSC-ADVICE-40-004-05</i></p>	<p>NA</p>	<p>No space constraints.</p>
<p><b>3. Labeling and Promotion</b> <span style="float: right;"><input type="checkbox"/> N/A</span></p>		
<p>3.1 Describe where / how the organization uses the SCS and FSC trademarks for promotion.</p>	<p>C</p>	<p>WCFP uses FSC trademarks on haul tickets and the WDNR website. Some counties use FSC trademarks on timber sale prospectuses.</p>
<p>3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.</p>	<p>C</p>	<p>WCFP has sought prior authorization from SCS.</p>
<p>3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.</p>	<p>C</p>	<p>Records of approval form prior years were reviewed.</p>
<p><b>4. Outsourcing</b> <span style="float: right;"><input checked="" type="checkbox"/> N/A</span></p>		
<p>4.1 The FME shall provide the names and contact details of all outsourced service providers.</p>	<p>-</p>	<p>-</p>

<p>4.2 The FME shall have a control system for the outsourced process 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> </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>	C	<p>Interviewed County staff demonstrated awareness of when to use haul tickets and how to assign them to each sale. There is low risk for failure to pass COC claims on to buyers since information from 2.3 is included in contract templates. Informal training occurs at WCFA meetings to review certification issues, including COC. Operators showed proper understanding of how to use the trip ticket system and the purpose of the COC procedures.</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, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).</p>	C	<p>Training on COC procedures occurs for new employees that learn timber sale administration. Since the current COC system is largely automated as information is included in contracts and load tickets by default, training records of training are minimal.</p>

**Appendix 8 – Trademark Standard Conformance Table**

- 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>The WCFP’s external use of the FSC trademark is limited to websites for Douglas County and WCFA, as well in the <i>Wisconsin Forest Management Guidelines</i>. It is also used internally on logging contracts, in the <i>Public Forest Lands Handbook</i>, and in the <i>Timber Sale Handbook 2461</i>.</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>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs</p>
<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>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs</p>
<p><b>Section 1.2 and 1.6 Evidence:</b> Reviewed TLA PGL.</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>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs</p>
<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.                  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 trade-mark portal and marketing toolkit.                  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).  <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>	<p><input type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs  <input checked="" type="checkbox"/> N/A, one or more noted exceptions apply</p>

<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> <ul style="list-style-type: none"> <li>a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme;</li> <li>b) 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>c) to promote product quality aspects not covered by FSC certification;</li> <li>d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names;</li> <li>e) 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> </ul>	<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		
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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="0"> <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, no translations</td></tr> </table>	<input type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input checked="" type="checkbox"/>	N/A, no translations
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<input checked="" type="checkbox"/>	N/A, no translations								
<p><b>Sections 1.3, 1.4, 2.1, and 2.2 Evidence:</b> Publicly-facing documents include the trademark symbol ® for the term ‘Forest Stewardship Council’ and the acronym ‘FSC’ in accordance with the standard. Internal documents such as logging contracts do not all have the trademark symbol, but this it not required for internal documents.</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="0"> <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, not using FSC logo</td></tr> </table>	<input type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input checked="" type="checkbox"/>	N/A, not using FSC logo
<input type="checkbox"/>	C								
<input type="checkbox"/>	NC								
<input type="checkbox"/>	C w/Obs								
<input checked="" 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><b>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.</b></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		
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**Sections 1.5 Evidence:** Reviewed SCS documentation of logo approvals on record.

**PART II: On-Product Use of FSC Trademarks**

N/A, not using on-product trademarks (skip Part II)

**PART III: Promotional Use of FSC Trademarks**

N/A, not using promotional trademarks (skip Part III)

<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>	<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 trademarks in catalogues/ brochures/websites</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 trademarks in catalogues/ brochures/websites
<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>	<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, not using trademarks on templates for FSC &amp; non-FSC products</td></tr> </table>	<input type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input checked="" type="checkbox"/>	N/A, not using trademarks on templates for FSC & non-FSC products
<input type="checkbox"/>	C								
<input type="checkbox"/>	NC								
<input type="checkbox"/>	C w/Obs								
<input checked="" 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>	<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, not labeling promotional items</td></tr> </table>	<input type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input checked="" type="checkbox"/>	N/A, not labeling promotional items
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<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> <ol 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> </ol> <p><i>NOTE: Use of text to describe the FSC certification of the FME does not require a disclaimer.</i></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, not using trademarks at trade fairs</td></tr> </table>	<input type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input checked="" type="checkbox"/>	N/A, not using trademarks at trade fairs
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<input checked="" type="checkbox"/>	N/A, not using trademarks at trade fairs								

<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>	<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>
<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>	<p><input type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs  <input checked="" type="checkbox"/> N/A, not using other scheme logos</p>
<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>	<p><input type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs  <input checked="" type="checkbox"/> N/A, approval granted prior to July 1, 2011</p>
<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>	<p><input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs</p>
<p><b>Sections 6.1 - 6.3, 6.5-6.7, 7.1-7. 4 Evidence:</b> Reviewed sample of websites: several FMUs, WCFP, and WCFA. Reviewed sample of sales and delivery documents.</p>	
<p><b>Number of trademark uses reviewed and rationale that sample choice is sufficient to confirm requirements are met:</b> Approximately 10 trademark uses were reviewed, comprising the primary publicly-facing and internal materials used in the management of the certified county forests.</p>	

**Annex A: Trademark use management system**

N/A, not using a trademark management system

**Annex B. Additional trademark rules for group FM certificate holders**

N/A, not a group FM certificate holder or group does not use any FSC trademarks

**Appendix 9 – Peer Review and SCS Evaluation Team Response to Peer Review**

A peer review was not conducted as part of this evaluation.



## Appendix 10 – 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 checked="" type="checkbox"/> <b>N/A – none of the FMU(s) under evaluation qualify as a SLIMF according to the criteria below.</b>	
<input type="checkbox"/> <b>'Small' FMU(s)</b>	<p>According to the SLIMF Eligibility Criteria addendum of FSC-STD-01-004a, the country/countries in which this certificate holder is located has a small SLIMF threshold of (check only one box):</p> <p><input type="checkbox"/> 100 ha (247 acres) or less</p> <p><input type="checkbox"/> Between 100 ha (247 acres) and 1,000 ha (2,471 acres)</p> <p><input type="checkbox"/> 1,000 ha (2,471 acres) or less</p>
<input type="checkbox"/> <b>'Low intensity' FMU(s)</b> –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 for any one FMU 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 m <sup>3</sup> / year (2.1 million board feet / year) during the period of validity of the certificate as verified by harvest reports and surveillance audits.

## Appendix 11 – Group Management Program

This is not a group certificate, so this appendix is not applicable.