

FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY SURVEILLANCE 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
2-5 August 2021
DATE OF REPORT FINALIZATION
21 December 2021

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Foreword

Cycle in annual surveillance evaluations				
<input type="checkbox"/> 1 st annual evaluation	<input checked="" type="checkbox"/> 2 nd annual evaluation	<input type="checkbox"/> 3 rd annual evaluation	<input type="checkbox"/> 4 th annual evaluation	<input type="checkbox"/> Other (expansion of scope, Major CAR audit, special audit, etc.):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
Wisconsin Counties (WISCO), Wisconsin Department of Natural Resources (WIDNR or DNR)				

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual evaluations to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database <http://info.fsc.org/>.

Pursuant to FSC and SCS guidelines, annual / surveillance evaluations are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope evaluation would be prohibitive and it is not mandated by FSC evaluation protocols. Rather, annual evaluations are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual evaluation);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this evaluation; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the evaluation.

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 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 90 days after completion of the on-site evaluation. Section B contains more detailed results and information for required FSC record-keeping or the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

Auditor name:	Brendan Grady	Auditor role:	FSC Audit Team Leader
Qualifications:	Mr. Grady is the Director, Forest Management Certification for SCS. In that role, he provides daily management and quality control for the program. He participated as a team member and lead auditor in forest certification audits throughout the United States, Europe, and South East Asia. Brendan has a B.S. in Forestry from the University of California, Berkeley, and a Juris Doctorate from the University of Washington School of Law. Brendan is a member of the State Bar of California, and was an attorney in private practice focusing on environmental law before returning to SCS.		
Auditor name:	Tucker Watts	Auditor role:	FSC team auditor
Qualifications:	Mr. Watts is a partner in Watts Consulting LLC. His primary focus is forest certification through auditing. Since 2008, Watts has been involved with SFI Forest Management, Fiber Sourcing, Certified Sourcing, and Chain of Custody auditing, FSC Forest Management and Chain of Custody auditing, Programme for the Endorsement of Forest Certification Chain of Custody auditing, auditing of the American Tree Farm System’s Group certification, auditing of the Responsible Procurement Program of the National Wood Flooring Association and auditing of the Sustainable Biomass Partnership. Watts has 30-year experience in forest management with a large forest products corporation involved in the manufacturing of paper, lumber and plywood. For 10 years, Watts was a system manager for the forest certification system.		
Auditor name:	Michelle L. Matteo	Auditor role:	FSC team auditor/SFI lead auditor
Qualifications:	Michelle L. Matteo is a senior lead auditor for NSF based in Southern New England. Michelle is a forester and arborist and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Arborist Certification. In addition to her role as an experienced lead auditor, Michelle serves as the manager of NSF’s Forestry Program. Michelle has completed a 3-day ISO 19011 training designed & presented in relation to the FSC Standards. For over 13 years, she has completed thousands of SFI, PEFC, & FSC Chain of Custody and Certified Sourcing audits, certification audits of the Northeast Master Logger program, and is a senior lead auditor for SFI & FSC Forest Management, American Tree Farm System (ATFS), SFI Fiber Sourcing, and FSC Controlled Wood. Her auditing experience spans the continental US, Canada, and the UK. She earned an MS in Forestry and BS in Wildlife & Fisheries Biology, both from the University of Massachusetts.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation:	4
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 follow-up:	2

E. Total number of person days used in evaluation:	14
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1.3 Standards Used

All standards used are available on the websites of FSC International (www.fsc.org) or SCS Global Services (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's 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's 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, 2010
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V8-0
	<input type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

Monday Aug 2 – All Auditors Eau Claire County
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 tools, review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection.
Tuesday Aug 3 – Eau Claire County – All Auditors
Sale 1785 Tract 15-17- 43 Acre Red Pine Thinning (3 rd thinning). Age 75 years. 1 Acre Oak Salvage for Oak Wilt. Purchased by Peter Crone. Presence of Praise Plant. Working to create habitat for plant. Access gated. Road is rocked as necessary. Xcel Energy has posted to limit access. Notification of Xcel Energy required and done by purchaser. Merchandised poles during harvest. Required treatment of stumps and skinning with Cellu-Treat. Debris spread. No water or special features on tract. No skinning observed. Tree selection based on declining health and crown spacing. At final harvest will convert to Jack Pine.
Sale 1810, Tract 1-19 - Shelterwood. Starting BA 120. BA reduced to 50. Prior to harvest, scarification of seed bed and uprooting of Maple and Witch Hazel was conducted. Tree selection based on straight stem and bole shape. Regeneration will be assessed in year 1, 3, and 5. Additional steps may be taken to improve regeneration prior to overstory removal - chemical treatment, re-

scarify, seed area. Aesthetics practiced around deck. Debris spread. Retention in low areas. Entrance was restricted.

Sale 1833 Tract 8-20- 1 Acre Clearcut. Purchased by Bridge Creek Logging. Small area adjacent to harvest by adjoining landowner. No issues identified by monitoring of sale.

Sale 1805 **Tract 22-18** – 48 total acres. Experiment site of Shelterwood and Thinning with University of Wisconsin - Stevens Point. Demonstration area for outreach of DMAP. Objective to demonstrate a DNR DMAP project to show landowners different treatments to obtain a landowner's goal. NHI review identified 1 elemental occurrence within 1 mile of site. Implementation of aesthetics creates a mosaic of stand structures. Oak Shelterwood and Thinning marked by students. Four deer exclusion areas have been identified and protected with fencing. Harvesting recommended in frozen or dry/firm conditions. Retention island identified. Good oak regeneration observed. Regeneration will be monitored at age 3, 5, and 7 years. Signage used to communicate message to public.

Packet of information includes Certificate of Liability Insurance of purchaser, Eau Claire County Timber Sale Agreement-Contract # 1805. Included in the Timber Sale Agreement are the following:

- FSC Claim and FSC CoC #
- Safety and insurance requirements
- Requirement for compliance with Wisconsin's Best Management Practices
- Rutting Policy
- Addendum #1 – Federal Identification Number & Workers Compensation Insurance Coverage

Sale 1816, Tract 9-19, 146 Acre total, 16 Acre Oak Shelterwood. 96 Acre oak Clearcut. 24 acre Red Pine Thinning, 10 acres retained-Green Tree Retention. Size of sale determined by limited access to area. Green tree retention includes Islands and White Oak on ridges. Retention will provide food and shelter for wildlife. Retention of 7%. Retention guidelines met. Quality Black Oak retained in shelterwood harvest. Debris spread across site. Waterbars and rolling dips used to stabilize access road. Red pine thinning is cut every 3rd row. No issues identified.

Rock Ford Crossing - Gate and berm used to control access. Area is open to foot traffic. Chapter 30 Permit obtained for rock ford. Access rocked for stabilization. Slope of road reduced for trucking of products. Ford establish 10 years prior to most recent harvest. Crossing recently used for harvesting. Native vegetation used to stabilize road surface. No washing observed. Rock crossing is functioning well. Presence of beaver dam observed. This is a recent development. Situation will be monitored for potential impacts.

Tract 13-16, sale 1762 – 18 acre, even aged harvest inside of state natural area. Objective was to convert area to pine barrens in order to increase this cover type in the SNA. SNA was designated in part because of Karner Blue butterfly habitat. 2017 harvest, followed by burn in 2018, in order to promote lupine as the habitat host plant. No issues identified in the site.

Tract 13-15, sale 1741, 2017 harvest, followed by prescribed burn in June 2021. Even aged harvest with goal of oak regeneration. Fire was introduced as a way to combat competing maple regen which was overtopping the oaks. New cross drain culvert installation on a problematic section of the road.

Some initial siltation was filling up the culvert, but this was a byproduct of the installation process and will be addressed before the project is closed out.

Tract 21-15, sale 1748, Red pine thinning (23 acres), white pine even aged harvest (5 acres). Red pine thinning goal to reduce down to 80 basal area. Swampy area was buffered out of the sale. Residual stand looked good, minimal stand damage.

Tract 21-16, Sale 1770 - 24 Acre Clearcut. 3 Acres Red Pine Thinning. Objective: Final harvest of oak and hardwoods to regenerate stand. Pine thinning to improve vigor. No equipment allowed in RMZ. Harvesting for frozen ground or firm/dry conditions. Wetlands and hardwood exclusion clearly identified. Small Red Pine will naturally be converted to oak due to size. Clearcut will be regenerated by coppice regeneration to Oak and Aspen stand. Retention of green tree islands (8.33%). Survival will be monitored in year 3 and year 5.

Packet of information includes Certificate of Liability Insurance of purchaser, Eau Claire County Timber Sale Agreement-Contract # 1770. Included in the Timber Sale Agreement are the following:

- FSC Claim and FSC CoC #
- Safety and insurance requirements
- Requirement for compliance with Wisconsin's Best Management Practices
- Rutting Policy

Addendum #1 – Federal Identification Number & Workers Compensation Insurance Coverage

Wednesday, August 4: Chippewa County (Auditors Grady & Watts)

Sale 1289 – 45 Acres. Logging for frozen ground only. Confirmed logger training. Witnessed Certificate of Liability Insurance. Timber Sale Contract includes FSC Claim and FSC CoC #. Haul Ticket includes FSC Claim and FSC CoC #. Witnessed Haul Ticket # 1599, 1888, 1894, 1891. Goal is to promote species other than Ash. In preparation for EAB, the desire is to shift the species composition away from Ash.

Sale 1256 – ATV Trail Expansion. Direct Sale (Less than \$3,000). Logger was working in area and asked to harvest ROW for ATV trail. Trail expansion was identified as part of public demand for increased ATV use and paid for with a trail development grant. Linking to existing trail networks. Major new bridge installation was included, for ATV and vehicle crossing (a nearby culvert crossing would still be used for log trucks and heavier traffic.) Installation of bridge was included. Timber Sale Contract includes FSC Claim and FSC CoC #. No issues identified.

Sale 1239 – 29 Acres Confirmed logger training. Witnessed Certificate of Liability Insurance. Timber Sale Contract includes FSC Claim and FSC CoC #. Haul Ticket includes FSC Claim and FSC CoC #. Witnessed Haul Ticket # 0374, 0387, 0363, 0377. Access is through ATV trail. Goal is to promote species other than Ash. In preparation for EAB, the desire is to shift the species composition away from Ash. Harvesting in frozen ground conditions only. No issues identified.

Sale 1311 – (Active)11 Acres Aspen Final Harvest. Timber Sale Contract does includes FSC Claim and FSC CoC #. Sale was not sold as certified material. Access through ATV trail. Small wetland area was excluded on the site with a red paint line. Discussions of wetland protection measures. No issues identified on the site.

Sale 1334 – 18 Acre Aspen Final Harvest. Horse and bike trails cross through sale area. Discussed communication with clubs prior to sale. Interview was also conducted with Vice President Chippewa Valley Riding Club. Communication is good between users and County. Through joint meetings communication has improved between users. Bikes and horses do not share the same trails.

Aesthetic zones are established along trails. Islands of hardwood are retained along trails. No operations are conducted in the retention areas. A total of 10-15% of the stand is retained. Sale has been sold, but no cutting has been conducted. Hickory and Oak will be retained during the harvesting. Gravel has been placed at access for stabilization. Access is controlled with a gate. Sale boundary and retention areas are clearly identified.

Sale 1292 – (Active) 45 Acres Aspen Final Harvest. Discussed harvesting requirements for sale, equipment, safety, bmp compliance, and logger training. Confirmed completion of logger training, presence of first aid kit, and spill kit on job. Fire extinguishers in equipment. Safety equipment worn by employees.

Aspen regeneration with retention of large pine trees. Dead trees retained. Slash spread on slopes and skid trails. Blow down around lake has been salvaged. RMZ well marked. Ponds and drains are well protected. No entrance into RMZ. Debris spread along edge of RMZ for additional buffering. Water bars have been established on roads and skid trails. Good regeneration observed during site visit.

Sale 1295 - ROW for daylighting of road to improve drying of road and road surface. Witnessed ROW painted red. Width of ROW is 20-25 ft. on each side of road. No issues identified.

HCVF - White Pine Swamp identified in Natural Heritage database. Area documented in the Biodiversity inventory layer of GIS.

Sale 1241 – Salvage of Blowdown. Direct sale. Stand divided due to damage. Aspen harvested along road. No issues identified.

Sale 1319 (Active) - CTL job. Operators have completed FISTA and Master Logger training. Observed service truck. No spills noted. First aid and spill kit present. Sale focuses on good Aspen market. Working along road. Will be working away from road at peak use time. Oak retention along road for aesthetics and to concentrate growth for logs. Marking will retain Oak and Conifer. Good utilization observed on site and in sorts at landing. Gravel used to stabilize access and road. Ticket box observed for collection of Haul Tickets. Witnessed tickets in box.

Invasive Species - Garlic Mustard identified along road. Discussed process for identification, documentation, control, chemical handling, and monitoring. Layer is included in GIS. Chemicals are documented in the herbicide notebook.

Dorothy Lake - Lake is identified as a Wisconsin State Natural Area and documented as a HCVF. DNR has stocked the lake with fish.

Sale 1309 – 23 Acre Red Pine. 2nd Thinning of small suppressed trees to 120 BA. Dominant trees will be released. Kettle wetlands has been buffered out of sale area. Gravel for stabilization of access. Gate to control access.

Sale 1274 - 24 Acre Clearcut of Aspen with Oak retention. 10 Acre Thinning of Oak. Road has been seeded and water barred. Aspen marked for retention. One-acre area marked to retention. No entrance. Area will have succession to Northern Hardwood.

Sale 1267 (Active) - Road daylighting for improved drying. Turnouts have been installed for drainage. Wetlands identified and marked with yellow for no entrance. Other wetlands have been marked out of sale area. Culvert has been installed on road for drainage. Gravel used for the stabilization of the culvert. Gravel crossing has also been installed. No issues identified. Debris scattered for stabilization. No rutting observed around decks. Mat of tops built in soft areas. Seven patch clearcuts of 2 acres each. Light scarification of patch clearcuts by dozer for regeneration. Landing observed. Fuel tanks clean with no issues.

Sale 1239 – ATV Trail Swamp Hardwoods Sale. 29 acre, selection harvest. Focus on ash removal, in preparation for Emerald Ash Borer moving into the area. Sale is in effect a “pre-salvage.” Goal is promotion of swamp hardwoods other than ash. Sale is adjacent to ATV trail, discussed possible recreation impacts and management.

Chippewa HWY K Maintenance facility – inspected pesticide storage. Shared pesticide storage with county parks department. Cabinet was secured, pesticide labels were on site.

Thursday, August 5: Clark County (Auditors Grady & Watts)

Auditor Matteo – Document review and staff interviews

Sale #1988, Tract 10-21 – Hardwood thinning (119 acres), Regen harvest (11 acres). Tract is located Levis Mound, very active recreational site with well-developed trails for mountain biking, ski & snowshoe trails. Sale was established but not yet cut. Discussed timing of sale to balance recreation objectives.

Levis Mound – stakeholder interview with local trail association. Demonstrated strong working relationship with county foresters. Trails are always cleaned of debris after harvest. Selection harvests used on the mound maintain scenic feel for recreation users. Review of recreational facilities.

Sale #1929, Tract 34-19, White pine thinning, set up but not yet sold. Target basal area of 120 in resulting stand. Eventual goal would be to move this stand back to an oak/maple system. No issues with the sale as proposed.

Lone Grave HCV – Historic grave site, state recognized as an archeological site with a grave and active memorial of a homesteader. One grave is identified, and possibly more are in the area. 3 acres were buffered out as a no management area. Discussed monitoring protocol for social HCVs.

Winx Flowage – reviewed history of flowage, established as migratory bird refuge by local civic club. Eventually donated to the county, maintained as bird habitat. Harvesting occurs in the property, but the flowage itself has standard buffer zones on it. Wetland herbicides are used to maintain the dyke/berm that created the flowage.

Clark County Forestry shop – reviewed chemical storage facility. Well maintained and secured, chemical labels present.

Oak TSI – timber standard improvement through oak release of 15 year old stand. Removal of pine and other competing vegetation using brush saws and hand tools. Oak is recognized as being difficult to regenerate in the area, and there are clear ecological benefits to keeping it on the landscape. Funded through turkey stamp grant funds.

Sale 1965, Tract 37-20 – 22 acre Regeneration harvest, final harvest of white pine/red maple, harvest on dry or frozen ground only. Site was reseeded with red maple/ white pine. Retention islands left in the stand. RMZ red line established along intermittent stream that bordered the sale. Confirmed that no harvest occurred within the RMZ.

Sale 31-16 - 28 Acre 1st Thinning. 61 Acre Final Harvest (Aspen). 12 Acre Final Harvest (Oak). Utilization is whole tree biomass, with pulp, bolts, and logs. Debris spread in skid trails. Chipping debris spread in minor rutting. Chipping debris will be used for stabilizing landing. Chipping debris will also be used on parking lot for horse trail and bath house. Horse trail crosses sale. Slash is spread 20 ft. from trail. ATV trail used for trucking. Retention identified with purple paint. Retention islands to prevent wind throw. Mats used for chipper and vans. No damage to residual stand observed. Aesthetics management around parking lot for horse trail and bath house. Area was part of the final harvest, but buffer was thinned. Witnessed and discussed ticket box for Haul Tickets.

Sale 9-19 - 51 Acre Oak Thinning. 29 Acre Aspen Clearcut. Minor rutting. Trail goes through sale. Trail marked in green. BA moved from 120 to 89. Dominant Oaks retained in residual stand. Tops pulled 20 ft from trail. Minimal skinning. Trail club will conduct trail maintenance. Trail club receives education material and training on sustainable forestry. CTL used for harvesting. Debris scattered for stabilization.

Sale 21-20 (Active) - 86 Acre Final Harvest (Aspen). 3 Acre Final Harvest (Oak). Logging contractor interview. Discussed sale planning and the contracting process, communication with County Forests, equipment, safety and safety equipment, and spill kit. Retention area marked in green. A total of 10 acres are retained. No entrance. Debris cleared in area of horse trail. A total of 6 acres are in the buffer along the horse trail for aesthetics. White Oak selected for residual stand. Existed crossing matted. Additional crossing has been removed. Area is clean of debris. Debris used to stabilize sides. No issues identified. Wetlands buffered with red line. Existing woods road will be clean of debris at close-out. A berm will be used to control access.

Site Preparation & Planting - 24 Acres in 3 units to be planted with Red Pine. Trenching for breaking duff layer (2019). Chemical site preparation by ground application (2020). Shape files provided to contractor. Planting of containerized Red Pine (2021). Seedlings matched to soil conditions. Planting quality monitored during planting. Witnessed monitoring. Survival will be monitored in the Fall of year 1, 3, and 5 for adequate stocking. Row is parallel to road. Observed good survival. No issues identified.

Prescribed Burn - 10 Acres. Prescribed burn conducted in Oak stand following shelterwood cut to reduce the duff for Oak regeneration and reduce competition. Burn was coordinated effort between County and DNR. Discussed the establishment of fire break, development of burn plan, and leadership if burn boss. Witnessed fire break, and burn plan. Observed good burn. Duff reduced and competition controlled. No issues identified.

Sale 4-17 - 17 Acre 1st Thinning. 19 Acre Final Harvest (Aspen). RMZ identified with green line. No entrance. ATV Trail is sale boundary and access to sale. Aesthetic strip thinned along major road to Rock Dam Lake and campgrounds. Minor damage to residual trees. Minor rutting. No issue. Debris used to stabilize skid trail. Leave trees and islands retained. No issues identified.

Oak TSI - 27 Acres. Retained trees marked. Brush saw used to remove trees. Treatment is used on tracts with heavy Oak composition. Maple and Aspen are removed. Tract will be burned prior to final harvest. Grant money use for treatment.

Site Preparation & Tree Planting - Area designated as an Ecological Management Unit for Pine Barren and Karner Blue Butterfly (HCVF). Site was converted from Red Pine to Jack Pine. Containerized seedlings were planted. Jack Pine will better compete with native vegetation. Trenching used for site preparation. Chemicals were not used to allow native plants, particularly the wild lupine's for the Karner Blue Butterfly. Lupine's seed are collected and planted on site.

Sale 13-17 - 2nd Thinning of Red Pine with Karner Blue Butterfly (HCVF). 1st Thinning of Red Pine. Goal is to thin from below to release crop trees. BA moved to 80-90. Minimal skinning observed. No issues identified.

CCC Camp - 5 Acres identified in area (HCVF). Camp Globe - Company 2618 - 1933-1942. Foundations of building have been clarified with lidar photography. No management in area. No issues identified.

Friday, August 6

Staff interviews, Document Review

Closing Meeting: Brief summary of audit activities, present preliminary findings, confidentiality, SCS/FSC dispute policy, timeline for report, and discuss next steps.

2.2 Evaluation of Management Systems

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 their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, 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. Changes in Management Practices

There were no significant changes in the management and/or harvesting methods that affect the FME’s conformance to the FSC standards and policies.

Significant changes occurred since the last evaluation that may affect the FME’s conformance to FSC standards and policies (*describe*):

4. Results of Evaluation

4.1 Definitions 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.

4.2 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation (2019)	1 st Annual Evaluation (2020)	2 nd Annual Evaluation (2021)	3 rd Annual Evaluation (2022)	4 th Annual Evaluation (2023)
No findings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
P1					
P2					
P3					
P4					
P5					
P6			Minor 6.6.e		
P7			Minor 7.3.a		

P8			Obs 8.1.a		
P9					
P10					
COC for FM					
Trademark					
Group					
Other					

4.3 Existing Corrective Action Requests and Observations

There were no open non-conformities.

4.4 New Corrective Action Requests and Observations

Finding Number: 2021.1	
Finding and Deadline	
<input type="checkbox"/> Major CAR: Pre-condition to certification/recertification <input type="checkbox"/> Major CAR: 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Minor CAR: 12 months or next regularly scheduled audit, whichever comes first (<i>surveillance or re-evaluation</i>) <input type="checkbox"/> Observation – response is optional <input checked="" type="checkbox"/> Other and deadline (specify): FSC-POL-30-001	
FMU CAR/OBS issued to (when more than one FMU):	
Standard and Indicator	FSC-US Forest Management Standard 6.6.e
<input checked="" type="checkbox"/> Non-Conformity Evidence <input type="checkbox"/> Observation Justification and/or Explanation Not all pesticides are consistently being reported by the counties on the annual data report. In particular, Cellutreat is being reported by some counties, and not others. In particular, interviews with staff in Eau Claire indicated it was being used, but the amounts were not reported. There was some discrepancy as to whether the chemical is classified as a pesticide since approval for its application is separate than most chemicals used by the counties. But it is labeled as a pesticide by the EPA and is on FSC chemical list.	
<input checked="" type="checkbox"/> Non-Conformity Corrective Action Request <input type="checkbox"/> Observation; no Corrective Action is required Records must be kept of pest occurrences and control measures.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2021.2	
Finding and Deadline	
<input type="checkbox"/> Major CAR: Pre-condition to certification/recertification <input type="checkbox"/> Major CAR: 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Minor CAR: 12 months or next regularly scheduled audit, whichever comes first (<i>surveillance or re-evaluation</i>) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other and deadline (specify):	
FMU CAR/OBS issued to (when more than one FMU):	
Standard and Indicator	FSC-US Forest Management Standard 7.3.a
<input checked="" type="checkbox"/> Non-Conformity Evidence <input type="checkbox"/> Observation Justification and/or Explanation Additional training is needed as to the use of the ESRAs in FSC-POL-30-001 and how the documents would affect pesticide application. During the audit it became clear that understanding of the ESRAs was highly variable between forestry staff and different counties, with some counties actively working to develop the ESRAs and implement them, while others were less familiar with the requirements. The policy is newly in effect this year, so some uncertainty is understandable, but it was viewed as a gap that needs to be improved.	
<input checked="" type="checkbox"/> Non-Conformity Corrective Action Request <input type="checkbox"/> Observation; no Corrective Action is required Forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the management plan.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2021.3	
Finding and Deadline	
<input type="checkbox"/> Major CAR: Pre-condition to certification/recertification <input type="checkbox"/> Major CAR: 3 months from Issuance of Final Report <input type="checkbox"/> Minor CAR: 12 months or next regularly scheduled audit, whichever comes first (<i>surveillance or re-evaluation</i>) <input checked="" type="checkbox"/> Observation – response is optional	

<input type="checkbox"/> Other and deadline (specify):	
FMU CAR/OBS issued to (when more than one FMU):	
Standard and Indicator	FSC-US Forest Management Standard 8.1.a
<input type="checkbox"/> Non-Conformity Evidence <input checked="" type="checkbox"/> Observation Justification and/or Explanation The results of the state-wide BMP Monitoring were not completed in a timely manner. At the time of the audit, the 2018 BMP Monitoring report had not been finalized. The report is not expected to be produced annually, and thus a non-conformance is not warranted. However the delay is still noteworthy.	
<input type="checkbox"/> Non-Conformity Corrective Action Request <input checked="" type="checkbox"/> Observation; no Corrective Action is required The FME should ensure that its monitoring procedures are consistently implemented.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

5. Stakeholder Comments

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 FME 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.

5.1 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.

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

The audit team sent email invitation to a selection of stakeholders for consultation as relevant to the Principles, Criteria and Indicators being evaluated in this audit.

<input type="checkbox"/> FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual evaluation.	
Stakeholder Comment	SCS Response
County forest maintains a strong relationship with local trail association. Harvests have been timed in order to avoid seasons of heavy recreational use. Harvest plans along trails have been set up using selection cuts that maintain aesthetics.	Noted as evidence of conformance. The audit team reviewed multiple examples of recreation management balanced with timber harvesting during the audit, and generally found that forestry activities did not negatively impact recreational opportunities.

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME’s response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	

7. Annual Data Update

<input type="checkbox"/> No changes since previous evaluation.
<input type="checkbox"/> Information in the following sections has changed since previous evaluation.

<input type="checkbox"/> Name and Contact Information <input type="checkbox"/> FSC Sales Information <input type="checkbox"/> Scope of Certificate <input type="checkbox"/> Non-SLIMF FMUs <input checked="" type="checkbox"/> Social Information	<input checked="" type="checkbox"/> Pesticide and Other Chemical Use <input checked="" type="checkbox"/> Production Forests <input type="checkbox"/> FSC Product Classification <input type="checkbox"/> Conservation & High Conservation Value Areas <input checked="" type="checkbox"/> Areas Outside of the Scope of Certification
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Name and Contact Information

Organization name	Wisconsin Department of Natural Resources – County Forest Program		
Contact person	Douglas Brown		
Address	518 W. Somo Ave.	Telephone	715-966-0157
	Tomahawk, WI 54487	Fax	
		e-mail	Douglas.brown@wisconsin.gov
		Website	http://dnr.wi.gov/topic/CountyForests/

FSC Sales Information

FSC salesperson	Collin Buntrock		
Address		Telephone	608-286-9083
		Fax	
		e-mail	Collin.Buntrock@wisconsin.gov
		Website	http://www.dnr.wi.gov

Scope of Certificate

Certificate type	<input type="checkbox"/> Single FMU	<input checked="" type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
SLIMF if applicable	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
	# Group Members (if applicable)	
Number of FMU's in scope of certificate	21	
Geographic location of non-SLIMF FMU(s)	<i>Latitude & Longitude:</i>	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is: Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac		
privately managed		
state managed		
community managed WICFP Note: (Rpt.50A 7/1/2020 - FSC only)	1,782,081.21	
Number of FMUs in scope that are:		
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
Total forest area in scope of certificate which is included in FMUs that: Units: <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	
Division of FMUs into manageable units:			
FMU are individual County Forests which are further subdivided into compartments and stands.			

Non-SLIMF FMUs (Group or Multiple FMU Certificates)

Name of County	Phone number	Location & Coordinates		Total forest area	Year(s) evaluated
Ashland	(715) 769-3777	46° 12' 45" N	-90° 28' 56" W	40,305.19	Since 2005
Bayfield	(715) 373-6114	46° 47' 12" N	-90° 58' 52" W	175556.53	Since 2005
Chippewa	(715) 726-7921	45° 11' 50" N	-91° 14' 53" W	34,653.84	Since 2005
Clark	(715) 743-5140	44° 35' 54" N	-90° 47' 46" W	134,742.08	Since 2005
Douglas	(715) 378-2219	46° 17' 39" N	-92° 0' 7" W	281,852.72	Since 2005
Eau Claire	(715) 839-4783	44° 45' 9" N	-91° 2' 7" W	52,712.10	Since 2005
Florence	(715) 528-3207	45° 46' 53" N	-88° 15' 4" W	37,003.09	Since 2005
Iron	(715) 561-2697	46° 17' 45" N	-90° 13' 48" W	175,342.96	Since 2005
Jackson	(715) 284-8475	44° 20' 57" N	-90° 32' 6" W	122,684.54	Since 2005
Lincoln	(715) 539-1034	45° 22' 57" N	-89° 50' 45" W	100,843.05	Since 2005
Oconto	(920) 834-7131	45° 2' 24" N	-88° 16' 40" W	43791.83	Since 2005
Oneida	(715) 369-6140	45° 35' 24" N	-89° 37' 1" W	82960.32	Since 2018
Price	(715) 339-6371	45° 34' 9" N	-90° 23' 54" W	92294.11	Since 2005
Sawyer	(715) 634-6728	45° 42' 43" N	-91° 3' 9" W	115,196.50	Since 2005
Vilas	(715) 479-5160	46° 2' 8" N	-89° 17' 19" W	41,151.19	Since 2017
Washburn	(715) 635-4490	45° 57' 3" N	-91° 44' 54" W	150196.03	Since 2005
Wood	(715) 421-8549	44° 22' 45" N	-90° 6' 2" W	37,826.21	Since 2005
Barron	(715) 537-6296	45° 37' 16" N	-91° 52' 6" W	16304.69	Since 2005
Forest	(715) 478-3475	45° 31' 52" N	-88° 52' 26" W	15250.84	Since 2005
Juneau	(608) 847-9390	44° 1' 2" N	-90° 8' 14" W	17,798.79	Since 2005
Taylor	(715) 748-1486	45° 19' 15" N	-90° 3' 47" W	17727.92	Since 2005

Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
male workers: # 1600	female workers: # 84	
Number of accidents in forest work since previous evaluation:	Serious: # 0	Fatal: # 0

Pesticide and Other Chemical Use

<u>County</u>	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	Roundup ProMAX	Glyphosate, pottassium salt	1 gal / 5.5 lbs active ingredient	2ac	Invasive Control, ROW vegetation control
	Garlon XRT	Triclopyr - butoxyethyl ester	4.375 gal / 27.56 lbs active ingredient	17.5 ac	Invasive Control, ROW vegetation control
	Milestone	Triiopropanlammonium salt	35 oz or 0.54 lbs active ingredient	17.5 ac	ROW vegetation control
	Oust XP	Sulfometuron Methyl	2.0 lbs	19.5 ac	Invasive Control, ROW vegetation control
Barron	Garlon	Triclopyr -Foiliar Application @ 5%	9.4 gal.	22	Buckthorn Control
	Garlon	Triclopyr -Basal Bark Application @ 20%	.8 gal.	22	Buckthorn Control
Bayfield	Milestone	Aminopyralid	2.65 gallons	288 acres	Knapweed right of way control
	Garlon 4 Ultra	Triclopyr	56 oz	23 acres	Buckthorn and Multiflora rose control
	Transline	clopyralid	2.58oz	1 acre	Black Locust control
	Escort XP	Metsulfuron methyl	5/8 oz	3 acres	Wild Parsnip control
	Accord XRT	Glyphosate	104 gallons	277 acres	Site prep
	Chopper	Imazapyr	24 gallons	156 acres	Site prep
	Oust Extra	Sulfometuron-methyl	17 pounds	277 acres	Site prep
	Forestry Garlon XRT	Triclopyr	38 gallons	121 acres	Site prep
Forestry Garlon XRT	Triclopyr	32.5 gallons	208 acres	Vegetation management in a barrens landscape	
Chippewa	Cornerstone Plus	Glyphosate	8 oz	spot treatment 67 acres	Garlic mustard suppression
Clark	<i>Garlon 4 Ultra</i>	Triclopyr	1.76 quarts	Spot Treatments	Invasive Control
	<i>Roundup Custom</i>	Glyphosate	9 ounces	>1	Embankment maintenance
	<i>Escort XP</i>	Metsulfuron methyl	0.34	Spot Treatments	Invasive Control
	<i>Accord XRT</i>	Glyphosate	107.2 gallons	191 acres	Site Prep for planting
	<i>Arsenal</i>	Imazapyr	1 ounce	Spot Treatments	Oak Wilt Control
	<i>Transline</i>	Clopyralid	38.95 ounces	Spot Treatments	Invasive Control
	<i>Milestone</i>	Aminopyralid	51.775 ounces	Spot Treatments	Invasive Control
	<i>Tordon K</i>	Picloram	58.5 ounces	Spot Treatments	Invasive Control
	<i>Chopper Gen2</i>	Imazapyr	22.86 gallons	191 acres	Site Prep for planting
	<i>Oust XP</i>	Sulfometuron-methyl	11.77 pounds	191 acres	Site Prep for planting
<i>Preference Surfactant</i>	Surfactant	61.44 ounces	Spot Treatments	Invasives	

Eau Claire	Rodeo	Glyphosate	1.5 qt/acre	69 acres	Red Pine Release
	Garlon	Triclopyr	1 qt/acre	69 acres	Red Pine Release
	Chopper	Imazapyr	20 oz/acre	62 acres	Site Prep
	Accord	Glyphosate	2 qt/acre	62 acres	Site Prep
	Oust	Sulfometuron-methyl	1 oz/acre	62 acres	Site Prep
Florence	Oust XP	Sulfometuron-methyl	18.28 lbs	292.5 acres	Site preparation for planting
	Accord XRT II	Glyphosate	55.5 gal	92.5 acres	Site preparation for planting
	Chopper Gen 11	Isopropylamine salt	17.3 gal	92.5 acres	Site preparation for planting
	Rodeo 5.4 ppg	Glyphosate	55 gal	200 acres	Plantation Release
	TaA-39		17.18 gal	200 acres	Plantation Release
Jackson	Garlon XRT & Garlon	Triclopyr	XRT 1912 oz & 60 qts	XRT 128 acres garlon 88 acres	Invasive spp control
	Element 4	Triclopyr	309 ozs	35 acres	Competition control
	Round up	Glyphosate	48 qts	22 acres	Weeds & Garlic Mustard
	Mad Dog	Glyphosate	36 qts	15 acres	Weeds
	Vanquish	Diglycolamine	305.92 ozs	128 acres	Glossy Buckthorn
	Polaris	Imazapyr	29.25 ozs	46 acres	Glossy Buckthorn
	Vastlan	Triclopyr choline	482.25 ozs	108 acres	Glossy Buckthorn & competiton control
Lincoln	Escort	Metasulfuronmethy	5.36 ozs	35 acres	Glossy Buckthorn
	Element 4	Triclopyr	2% solution/foiar spot spray	27 acres	garlic mustard/road right of way
	Oust	Sulfometuron-methyl	1 oz./acre	27 acres	garlic mustard
Oconto	Cellutreat	Disodium Octaborate Tetrahydrate (CAS No. 12280-03-4)	5% solution	stump spray 20 acres	HRD
	Cellutreat	disodium Octaborate Tetrahydrate	300 lbs	450	HRD
	Element 4	Triclopyr Butoxyethyl ester	2 Gals	6	Oak Release
	Accord	glyphosate	165 Qt	82.8	Competition control
	Chopper	isopropylamine salt of imazapyr	1656 Oz	82.8	Competition control
Oneida	Oust	sulfometuron methyl	82.8 Oz	82.8	Competition control
	Round-Up	Glyphosate	10 Oz	1 acre	Weed control on Campground Pads
Price	Round-Up	Glyphosate	16 Oz	1 acre	Spot weed control in parks
	Glystar	Glyphosate	2.5% solution	14.5 acres	Wildlife opening maintenance and park maintenance
Sawyer	Garlon 4	Triclopyr	3% solution	spot treatment	garlic mustard control
	Garlon 4	Triclopyrbutoxyethyl ester	1 gallon	less than 1 acre	Oak wilt control
Taylor	Garlon 3A	Triclopyr 44.4%	5 oz	1 acre spot treat	Dam maintenance
	Garlon 3A	Triclopyr 44.4%	18 oz	3 acres spot treat	invasive control: buckthorn and honeysuckle
	Buccanneer Plus	Glyphosate 41%	15 oz	3 acres spot treat	invasive control: buckthorn and honeysuckle

Vilas	Accord XRT:	IMAZAPYR	27.25 gallons	73 acres	Woody vegetation competition control for planting project
	Chopper Gen II:	GLYPHOSATE	9.15 gallons	73 acres	Grass and Sedge Competition Control for planting project
	Oust:	SULFOMETURON METHYL	4.6 pounds	73 acres	Post emergent competition control for planting project

Production Forests

Timber Forest Products		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)		1,480,410 forested area. (1,419,220 ac-96% of total forested area is scheduled for harvest) (Rpt.101)
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		139,210 (PR, SW and 2/3 PJ) (Rpt.102)
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems		1,341,200
Silvicultural system(s)		Area under type of management
Even-aged management		
Clearcut (clearcut size rangeAverage 22.3 Acres)		164,770 - 1/3 PJ, OX, 1/2 MR, Fb, SB, 1/2 T, 1/2 C
Shelterwood		198,470 PW, O & 1/2 MR
Other: (e.g., coppice, seed-tree)		667,414 (A, BW, MC, SC, 1/2 T, 1/2 C)
Uneven-aged management		
Individual tree selection		230,730 NH
Group selection		75,625 BH, SH, CH, H, MD
Other:		
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)		
Non-timber Forest Products (NTFPs)		
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
Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i>		
Species	Scientific Name	Miscellaneous conifers:
Aspen/Poplar:	Populus tremuloides	Scotch pine Pinus sylvestris
	Populus grandidentata	European larch Larix decidua
Balsam poplar	Populus balsamifera	Norway spruce Picea abies
		Eastern red cedar Juniperus virginiana
Bottomland hardwoods:		Blue spruce Picea pungens

Eastern Cottonwood	Populus deltoides		Miscellaneous deciduous:	
Swamp white oak	Quercus bicolor		Norway maple	Acer platanoides
Silver maple	Acer saccharinum		Boxelder	Acer negundo
American elm	Ulmus americana		Black locust	Robinia pseudoacacia
River birch	Betula nigra		Honey locust	Gleditsia triacanthos
Green ash	Fraxinus pennsylvanica		Eastern Hophornbeam,	Ostrya virginiana
			Ironwood	
			Musclewood, Blue	Carpinus caroliniana
			beech	
			Northern hardwoods:	
Central hardwoods:		Sugar maple	Acer saccharum	
White oak	Quercus alba	Yellow birch	Betula alleghaniensis	
Bur oak	Quercus macrocarpa	White ash	Fraxinus americana	
Black oak	Quercus velutina	American beech	Fagus grandifolia	
Northern pin oak	Quercus ellipsoidalis	American basswood	Tilia americana	

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	All species listed above.
W3 Wood in chips or particles	W3.1 Wood chips	All species listed above.
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
NA	NA	

Conservation and High Conservation Value Areas

Conservation Area	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).* * WIDNR-CFP Note: (WisFIRS report 101; prefix R, Y and Z)	61,228

**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); myriad of identified State Natural Areas; -9 Counties	23,223
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.	Chippewa Moraines; Dorothy Lake, Townline Lake and Woods Town Line Lake complexes; Oak/Pine Barrens; Karner Blue Butterfly habitat; 2 Counties	1,780
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Barnes Barrens; Pine Barrens; Karner Blue Butterfly habitat; Noisy Creek Cedars; Enterprise Wetland Forest Hemlocks; Gobbler Lake SNA; 4 Counties	15,363
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	None known to be in WI	
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	None known to be in WI	
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).	CCC Camp (New)- Clark County Lone Grave (New)- Clark County Burial Mounds- Oconto County	13
Total area of forest classified as 'High Conservation Value Forest / Area'			40,379

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

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.
<input checked="" type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.
<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.

Explanation for exclusion of FMUs and/or excision:	30 county forests exist in Wisconsin. 21 of them have chosen to commit to FSC certification. There are an additional 6 counties that are SFI certified, and 3 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 or not enrolled in the County Forest Law.	
Control measures to prevent mixing of certified and non-certified product (C8.3):	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.	
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input type="checkbox"/> ac)
See Wisconsin County Forest FMU Summary table below	Scattered across Wisconsin.	~750,000 acres. (Includes SFI-only counties, non-certified counties, and straight county land (not certified) in FSC counties) Total acreages 7/1/2020: FSC 1,782,081 SFI 2,224,997 Non-certified 25,000+

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected for Evaluation

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

SCS staff establish 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.

There are 21 Counties that belong to this certificate and a sampling is done each year

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other (please describe)
Eau Claire County	Large	Natural	Sampling with random selections within the county.
Clark County	Large	Natural	Sampling with random selections within the county.
Chippewa County	Large	Natural	Sampling with random selections within the county.

Appendix 2 – 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.

Opening/Closing Meeting

Rebekah Luedtke	WCFA Executive Director
Dave Kafura	WCFA Assistant Executive Director
Travis Wollenberg	Forest County Forest Administrator
John Cisek	Barron County Forest Administrator
Mark Heyde	WCFA Issues Coordinator
Curtiss Lindner	Clark County Forest & Parks Administrator
John Wendorski	Clark County Assistant County Forest Administrator
Jacob Larson	Chippewa Assistant County Forest Administrator
Matt Hansen	Chippewa County Forest Administrator

Josh Pedersen	Eau Claire County Forest Administrator
Mark Gossman	Polk County Forest Administrator
Dennis Hutchison	DNR County Forest Liaison – Chippewa County
Paul Heimstead	DNR County Forest Liaison – Polk County
Andrew Sorenson	DNR Eau Claire Team Leader
Kyle Johnson	DNR County Forest Liaison – Eau Claire County
Matt Blaylock	DNR Park Falls Area Forestry Leader
Greg Mitchell	DNR Black River Falls Area Forestry Leader
Eric Zenz	DNR Southwest District Forestry Leader
Scott Roepke	DNR Wildlife Biologist
Sebastian Neisius	Clark County Forester
Katy Broquard	DNR County Forester Liaison- Iron County
Ryan Severson	DNR Northeast District Leader
Tim Lizotte	DNR Forestry Business Services Bureau Director
Jake Woodley	Clark County Forestry Technician
Carmen Hardin	DNR Applied Forestry Bureau Director
Kristen Lambert	DNR Public and Private Lands Section Chief
Brad Hutnik	DNR Silviculturist – Ecologist
Greg Edge	DNR Silviculturist – Ecologist
Teague Prichard	DNR State Forest Specialist
Heather Berklund	DNR-Chief State Forester
Sadie Brown	DNR Forestry Staff Specialist Dodgeville Area
Doug Brown	DNR County Forest and Public Lands Specialist
Kristine Buchholtz	DNR Forestry Staff Specialist Spooner Area

Field Sign-in Sheet

Name	Job Title	Phone OR Email
<i>Sadie Brown</i>	<i>County Forest Spec</i>	<i>715-966-0157</i>
<i>Mark Heyde</i>	<i>WCFA Cert. Coord.</i>	<i>608-577-6159</i>
<i>Dave Kellum</i>	<i>WCFA Assis Ex Dir.</i>	<i>715-520-7503</i>
<i>Chuck Jundt</i>	<i>Forester</i>	<i>715-514-0428</i>
<i>John Stuebel</i>	<i>Supervisor (Asst Adm)</i>	<i>715-839-7675</i>
<i>John Stuebel</i>	<i>County Forest Liaison (DNR)</i>	<i>715-533-8076</i>
<i>Tom Ren</i>	<i>County Forest Admin</i>	<i>715-839-4787</i>
<i>Jake Tumm</i>	<i>County Forester</i>	<i>715-563-2265</i>
<i>Winnie Parker</i>	<i>Admin EC</i>	<i>715-839-4739</i>

Name	Job Title	Phone OR Email
Dr. J. Mastropolo	LCFM Director	715-726-4590
Jacob Larson	Asst Forest Admin	715-777-2844
Dennis Hutchison	WDR Liaison	715-382-6504
Matt Hansen	Forest Administrator	(415) 738-2599
Alan Bore	Vice President Joppa Valley Trails	715-933-1688
John Wemborski	Asst Forest Admin	715-743-8609
Sarah Munn	Forester	715-937-3849
Andy Ryan	Forester	715-937-3846
John Schally	Forestry Technician	715-797-1984
Erin	DNR (Liaison)	715-957-5547
Curtis Lindner	Forest Administrator	715-937-6039
	Packst Programs Mgr	715-7

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)
Steve Meurett	President - Neillsville Area Trail Association	smeurett@yahoo.com	Email	Y

* 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.

Appendix 3 – Additional Evaluation Techniques Employed

- None.
- Additional techniques employed (describe):

Appendix 4 – Required Tracking

Pesticide Derogations

- There are no active pesticide derogations for this FME.

Name of pesticide / herbicide (active ingredient)	Date derogation approved

Condition	Conformance (C / NC)	Evidence of progress

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:

Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

<input checked="" type="checkbox"/>	Not applicable; no significant issues identified that may impact the next audit.
Some issues were identified during this audit that the next audit team could consider in the next audit, such as:	
<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 type="checkbox"/>	Suggested issues investigate during the next audit:
<input type="checkbox"/>	Suggested sites for inspection:
<input type="checkbox"/>	Stakeholders to be consulted:
<input type="checkbox"/>	Other(s) – please describe:

Appendix 5 – Forest Management Standard Conformance Table

Criteria required by FSC at every surveillance evaluation (<i>check all situations that apply</i>)	<input type="checkbox"/> NA – all FMUs are exempt from these requirements. <input type="checkbox"/> Plantations > 10,000 ha (24,710 ac): 2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, and 10.8 <input checked="" type="checkbox"/> Natural forests > 50,000 ha (123,553 ac) ('low intensity' SLIMFs exempt): 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, and 9.4 <input checked="" type="checkbox"/> FMUs containing High Conservation Values ('small forest' SLIMFs exempt): 6.2, 6.3, 6.9 and 9.4
Documents and records reviewed for FMUs/sites sampled	<input checked="" type="checkbox"/> All applicable documents and records as required in section 7 of audit plan were reviewed; or <input type="checkbox"/> The following documents and records as required in section 7 of the audit plan were NOT reviewed (<i>provide explanation</i>):

Requirements Reviewed in Annual Evaluation

Evaluation Year	Requirements Reviewed (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.)
2019	All – (Re)certification Evaluation
2020	P2, P4, P7, CoC, TM and mandatory criteria from above: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.9, 8.2, and 9.4
2021	P1, P6, mandatory criteria from above: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.9, 8.2, and 9.4
2022	
20XX	

C= Conformance with Criterion or Indicator

NC= Nonconformance with Criterion or Indicator

NA = Not Applicable

NE = Not Evaluated

FSC Principles Checklist

FSC Forest Management Standard (v1.0)—United States

REQUIREMENT	C/N C	COMMENT/CAR
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.		
C1.1 Forest management shall respect all national and local laws and administrative requirements.	C	-
1.1.a Forest management plans and operations demonstrate compliance with all	C	The Wisconsin County Forest Program (WCFP) was established per County Forest Law (s 28.11 Wis. Stats.)

<p>applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.</p>		<p>(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> <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>1.1.b To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	<p>C</p>	<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 & 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>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</p>	<p>C</p>	<p>-</p>
<p>1.2.a The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.</p>	<p>C</p>	<p>10% of stumpage payments are made from County Forests (county government) to municipalities (towns & 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 audit were reviewed</p>

		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.
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	-
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.	C	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.
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.	C	-
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	NA	No conflicts between compliance with laws or regulations and FSC Principles, Criteria or Indicators have been identified
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	-
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).	C	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

		<p>timber sales are monitored by county foresters several times per week, which includes ensuring that illegal or unauthorized 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, multiple examples of boundaries were reviewed during the 2021 audit.</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>

		Some counties 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.
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	C	-
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	C	All county forests that are FSC certified have made commitments. For example, the following is from the Clark County management plan, revised in 2020: “In keeping with this responsibility, Clark County is committed to conforming to the standards of the Forest Stewardship Council®”
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	C	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 management due to species composition (e.g., low timber value), difficulty in regeneration, and other reasons as stated in each county’s CLUP.
P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
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.	C	-

<p>2.3.a. If disputes arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p>	<p>C</p>	<p>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 of stakeholders and any disputes through open communication, negotiation, and/or mediation.</p>
<p>2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.</p>	<p>C</p>	<p>The DNR and counties maintain written documentation of any significant disputes over tenure and use rights.</p>
<p>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p>		
<p>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.</p>	<p>NA</p>	<p>FME does not manage any tribally-owned FMUs.</p>
<p>C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	<p>C</p>	<p>-</p>
<p>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.</p>	<p>C</p>	<p>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.</p>
<p>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.</p>	<p>C</p>	<p>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 for this</p>

		<p>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>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</p>		
<p>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</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>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.</p>	<p>C</p>	<p>-</p>

<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"> • Archeological sites and sites of cultural, historical and community significance (on and off the FMU); • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p>	<p>C</p>	<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"> • 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. • County forests allow camping, hunting, and fishing. Firewood cutting is allowed with a permit. Implementation of Wisconsin BMPs help to protect water quality. • Aesthetic considerations in setting up harvests are common, including aesthetic buffers harvest units. • 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. • 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. • 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. <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>
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<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 public forests, consultation shall include the following components:</p> <ol style="list-style-type: none"> 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 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; 3. An accessible and affordable appeals process to planning decisions is available. <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>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 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>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.</p>		
<p>C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</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"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <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 Field Inventory & 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 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>At the time of the 2021 audit, the 15-year average harvest for the FSC-certified is aligned with this AAH at 43,410 acres. The counties established 36,250 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> <p>None of the NTFPs are sold as FSC-certified.</p>
<p>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.</p>		

<p>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.</p>	<p>C</p>	<p>-</p>
<p>6.1.a. Using the results of credible scientific analysis, best available information (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"> 1) Forest community types and development, size class and/or successional stages, and associated natural disturbance regimes; 2) Rare, Threatened and Endangered (RTE) species and rare ecological communities (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) Soil resources; and 6) Historic conditions on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions. 	<p>C</p>	<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>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 best available information, drawing from scientific literature and experts. The impact assessment</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-</p>

<p>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>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, 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>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.</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>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>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 measures in place for RTE species to avoid the risk of impacts of forest management activities.</p> <p>DNR reports the following particular surveys were conducted by NHC staff since the 2020 audit:</p> <ul style="list-style-type: none"> - Rare and endangered butterfly surveys on Jackson County forest that included surveys for regal fritillary, frosted elfin, KBB, gorgone checkerspot, dusted skippers, phlox moths, and cobweb skippers. - Kirtland’s Warbler surveys on Jackson County Forest. - Red-shouldered Hawk monitoring/surveys on several northwestern counties. - Goshawk monitoring/surveys on several northwestern counties.”
<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</p>	<p>C</p>	<p>Numerous examples of use of the NHI database and corresponding protection measures were observed during this audit, see site notes for details.</p>

<p>viability of the species and their habitats. Conservation zones and/or protected areas 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>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>	C	<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. Several examples of Karner Blue Butterfly management areas were observed during the 2021 audit.</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>	C	<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>C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	C	-
<p>C6.3.a. Landscape-scale indicators</p>		
<p>6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented successional 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</p>	C	<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>natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>		
<p>6.3.a.2. When a rare ecological community 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, conservation zones and/or protected areas are established where warranted.</p>	<p>C</p>	<p>Numerous examples of rare ecological communities were visited during the 2021 audit. Most common examples would be various riparian and wetland zones. 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 Type 1 and Type 2 old growth. 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 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>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.</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"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 		
<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 Riparian Management Zones (RMZs) to provide:</p>	<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</p>

<ul style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 		<p>areas. BMP, soil disturbance, and ephemeral pond monitoring projects are conducted on county forest lands by the DNR forest hydrologist.</p>
<p>Stand-scale Indicators 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	C	<p>The harvests observed in the 2021 audit 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 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. Native species suited to the site are normally selected for regeneration.</p>	C	<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:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. 	C	<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>Legacy trees where present are not harvested; and b) vertical and horizontal complexity. Trees selected for retention are generally representative of the dominant species found on the site.</p>		
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>	C	<p>When even-aged harvests are conducted, guidelines for green tree retention areas, biomass harvesting, course 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>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"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding 	C	<p>There are no additional restrictions on even-aged management for the Lake States-Central Hardwoods region.</p>

<p>natural disturbance regimes for the FMU.</p> <ol style="list-style-type: none"> 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 		
<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 <i>invasive species</i>, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	C	<p>The threat of invasive species varies between counties, and each of the counties visited during the audit have active invasive species control programs. Several counties maintain active herbicide programs for controlling invasive species, which were reviewed during this past audit.</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>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	<p>C</p>	<p>-</p>
<p>6.4.a The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the <i>landscape</i> (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) GAP analyses; 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>6.4.b Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p> <p>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 HCVPs that overlap with RSAs.</p>
<p>6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p>	<p>C</p>	<p>Management activities in RSAs consist of either no management, or management activities designed to maintain the RSAs, such as prescribed burns.</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>6.4.d The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p>	C	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>6.4.e Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p>	C	This indicator is met through the establishment of RSAs, HCVs, riparian buffers, and a diversity of seral stages across the landscape.
<p>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.</p>	C	-
<p>6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	C	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>6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	C	All sites evaluated by the 2021 audit team showed the implementation of BMPs, including properly constructed water bars, water crossings, and slashed trails.
<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</p>	C	Wisconsin BMPs form the base for conformance to this indicator. Review of BMPs during the 2021 audit demonstrated strong overall compliance.

<p>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"> • 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. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate. 		
<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"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize 	<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>ecological impacts;</p> <ul style="list-style-type: none"> • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 		
<p>6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written <i>Streamside Management Zone (SMZ) buffer</i> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>	C	<p>Riparian Management Zones (RMZs) are described in Wisconsin’s BMP manual. The manual includes the application of BPMs in wetland environments, including recommended vegetative buffer widths. The BMP manual includes examples of RMZ widths for common situations, such as even-aged aspen harvests.</p> <p>Numerous sites visited during the audit demonstrated proper implementation of streamside buffer zones.</p>
<p>6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water</p>	C	<p>All RMZ buffer widths observed during the audit were consistent with those recommended by Wisconsin’s BMP manual.</p>

<p>bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</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 aquatic habitat. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	C	<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 during the 2021 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>	C	<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>	C	<p>No grazing with domesticated animals is permitted on county forests.</p>
<p>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</p>	C	-

<p>chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>		
<p>6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	C	All chemicals reported were not on the highly hazardous list.
<p>6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>	C	<p>Herbicides are primarily used to control invasive species, but are also employed in site preparation for sites that need mineral soil exposure or to liberate shade intolerant species from competition. In the case of invasive species, herbicides are the most effective method, and result in lower environmental and social costs due to avoidance of ground disturbance that could create conditions for invasive species regeneration.</p> <p>Trained and licensed County Forest staff apply most herbicides, although aerial prescriptions may be contracted to third parties. WDNR’s BMPs for invasive species and water quality are adhered to, which include instructions for following label recommendations and choosing least damaging methods of application.</p>
<p>6.6.c Chemicals and application methods are selected to minimize risk to non-target species</p>	C	Aerial application is typically used only over large treatment areas where extensive site prep is require to

<p>and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.</p>		<p>establish shade intolerant species such as Jack pine or Red pine. Ground treatments may be used in site prep and are usually applied using machinery or backpack sprayers. Spot treatments are applied with backpack sprayers to control invasive species.</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. 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>Written prescriptions are prepared prior to application, including a map as required by the indicator. Environmental precautions and site specific hazards cited included wind and sensitive features.</p>
<p>6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	<p>NC</p>	<p>Pesticide use records are maintained by County Forest Administrators and are entered in WisFIRS. Prescriptions and evaluations of prescriptions are maintained in County offices.</p> <p>Not all pesticides are consistently being reported by the counties on the annual data report. In particular, Cellutreat is being reported by some counties, and not others. In particular, interviews with staff in Eau Claire indicated it was being used, but the amounts were not reported. There was some discrepancy as to whether the chemical is classified as a pesticide since approval for its application is separate than most chemicals used by the counties. But it is labeled as a pesticide by the EPA and is on FSC chemical list. See Finding 2021.1</p>
<p>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.</p>	<p>C</p>	

<p>6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills.</p>	<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>6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.</p>	<p>C</p>	<p>No spills were reported on any of the county properties visited in 2021. 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 evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.</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>
<p>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.</p>	<p>C</p>	<p>-</p>
<p>6.8.a Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i>, insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are noninvasive and are safe for native species.</p>	<p>C</p>	<p>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. No biological control agents were used on the sampled counties during the 2021 audit.</p>
<p>6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.</p>	<p>C</p>	<p>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.</p>
<p>6.8.c If biological control agents are used, their use shall be documented, monitored and</p>	<p>C</p>	<p>When biocontrol agents have been used in the past, the use was documented and monitored in accordance</p>

<p>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.</p>		<p>with state and federal law, and confirmed to be non-invasive.</p>
<p>6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose</p>	C	<p>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>
<p>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p>	C	-
<p>6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p>	C	<p>No known exotic species were used on the county forests during the past year.</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.</p> <p><i>Wisconsin's Forestry Best Management Practices for Invasive Species Field Manual</i> (Appendix H) lists species recommended for revegetation.</p>
<p>6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.</p>	C	<p><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>	C	<p>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.</p>
<p>C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: 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.</p>	C	-
<p>6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited</p>	C	<p>Documentation of any forests to non-forest use is maintained by county forest administrators. WCFP consists of natural forests (including planted natural</p>

<p>portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>		<p>forests) and no FSC plantations. Counties have not conducted any conversion of forestland to non-forest use.</p>
<p>6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>No conversion has taken place.</p>
<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>No conversion has taken place.</p>
<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	<p>C</p>	<p>No conversion of natural/semi-natural stands to non-forest use was reported or observed during the 2021 assessment.</p>
<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)</p>	<p>C</p>	<p>No conversion of natural/semi-natural stands to non-forest use was reported or observed during the 2021 assessment.</p>
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to</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 rights may expire in many areas when the rights holder does not exercise the rights within 20 years.</p>

<p>non-forest use would be subject to Indicator 6.10.a-d.</p>		
<p>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.</p>		
<p>C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</p>	<p>C</p>	<p>-</p>
<p>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.</p>	<p>NC</p>	<p>All operators interviewed in 2021 were FISTA-trained; training records were reviewed. Harvest maps were onsite during active operations.</p> <p>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.</p> <p>Additional training is needed as to the use of the ESRAs in FSC-POL-30-001 and how the documents would affect pesticide application. During the audit it became clear that understanding of the ESRAs was highly variable between forestry staff and different counties, with some counties actively working to develop the ESRAs and implement them, while others were less familiar with the requirements. The policy is newly in effect this year, so some uncertainty is understandable, but it was viewed as a gap that needs to be improved. See Finding 2021.2</p>
<p>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.</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>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.</p>	<p>C</p>	<p>-</p>
<p>8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.</p>	<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>The results of the state-wide BMP Monitoring were not completed in a timely manner. At the time of the 2021 audit, the 2018 BMP Monitoring report had not been finalized. The report is not expected to be produced annually, and thus a non-conformance is not warranted. However the delay is still noteworthy. See finding 2021.3</p>
<p>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.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ul style="list-style-type: none"> 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) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) 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). 		

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

Central Hardwoods:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >160 years old (a)
- Municipal watersheds –headwaters, reservoirs (c)
- Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund’s Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)
- Intact forest blocks in an agriculturally dominated landscape (refugia) (a)
- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens (c)
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund’s Forest Communities of Highest Conservation Concern (b)

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

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

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

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

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

<p>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.</p>	<p>C</p>	<p>-</p>
<p>9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	<p>C</p>	<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>C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	<p>C</p>	
<p>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.</p>	<p>C</p>	<p>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. 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.</p>
<p>9.4.b. When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the</p>	<p>C</p>	<p>According to FME staff and external stakeholders, no increasing risks to HCVs have been detected.</p>

<p>measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.</p>		
<p>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.</p> <p>This principle is not applicable for the FME.</p>		

Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table

Chain of Custody indicators were not evaluated during this evaluation.

SCS FSC Chain of Custody Indicators for Forest Management Enterprises, V8-0

Appendix 7 – Trademark Standard Conformance Table

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

<p><input type="checkbox"/> NA, does not use/intend to use FSC trademarks for any purposes; or</p> <p><input type="checkbox"/> NA, 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.</p> <p><i>(finished with this section; all TM checklists may be deleted)</i></p> <p><i>Note: in case of requests for interpretation, the English version of these indicators shall be preferred.</i></p>

Forest Management Trademark CARs Chart/ Certificate Type	Audit Type – Grade
<p><i>Since trademark use is a minor aspect of FM audits, most nonconformances result in Minor CARs outside of the exceptions noted in this table. In the cases of integrated operations (i.e., operations with both FM/COC and COC certificates), timelines assigned for Minor CARs may be aligned with nonconformities of the COC certificate (e.g., Minor CAR with deadline of 3 or 6 months). SCS national offices/affiliates may take local considerations (e.g., legal framework) into account to assign CAR grades.</i></p>	
FM/COC or FM (Single/Multiple FMU)	Main Evaluation – Major if detected prior to certificate issuance
	Re-Evaluation/ Surveillance – Major if certificate is not valid (e.g., suspended)
CW/FM (Single/Multiple/Group)	All – Major per 3.1 of SCS COC Indicators for FMEs
Annex A – TM Management System (TMMS)	All – Major if TMMS not approved by SCS or SCS affiliate
Annex B – Group	Main Evaluation – Major
	Re-Evaluation/ Surveillance – Major or Minor depending on the scale/scope

1. General Requirements for Use of the FSC Trademarks (FSC “checkmark-and-tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)																	
Trademark uses reviewed: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #add8e6;">Trademark Application (on-product/promotional)</th> <th style="background-color: #add8e6;">Case Approval #, or Email (include approver name & date), or other appropriate documentation</th> <th style="background-color: #add8e6;">Are all elements correct? (e.g., trademark symbol, color scheme, size, etc.) If not, describe in Nonconformities below.</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Website</td> <td></td> <td style="text-align: center;">Y <input checked="" type="checkbox"/> N <input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Timber Sale Contracts</td> <td></td> <td style="text-align: center;">Y <input checked="" type="checkbox"/> N <input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Log Load Tickets</td> <td></td> <td style="text-align: center;">Y <input checked="" type="checkbox"/> N <input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Forest Management Plans</td> <td></td> <td style="text-align: center;">Y <input checked="" type="checkbox"/> N <input type="checkbox"/></td> </tr> </tbody> </table> <p><input type="checkbox"/> All known uses reviewed.</p> <p><input checked="" type="checkbox"/> Sample reviewed. Rationale that sample choice is sufficient to confirm requirements are met: Of the 21 Counties in the certificate only 3 were sampled in the field. Of those 3 counties all timber harvests and forest management activity documents were examined for logo use. Website was searched for “FSC” and “Forest Stewardship Council” terms, and the Certificate “landing page” was examined.</p> <p><input type="checkbox"/> Trademark uses detected include those grandfathered in under prior FSC trademark rules (e.g., FSC-TMK-50-201). Place the initials “GF” by the specific Trademark Applications above. <i>Note: This only applies to printed items or physical promotional materials (e.g., hats, load tickets) in stock. New printings, items, and websites must be updated per FSC-STD-50-001 requirements. If the organization only has GF uses and no new uses, the rest of this checklist is NA.</i></p>			Trademark Application (on-product/promotional)	Case Approval #, or Email (include approver name & date), or other appropriate documentation	Are all elements correct? (e.g., trademark symbol, color scheme, size, etc.) If not, describe in Nonconformities below.	Website		Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	Timber Sale Contracts		Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	Log Load Tickets		Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	Forest Management Plans		Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Trademark Application (on-product/promotional)	Case Approval #, or Email (include approver name & date), or other appropriate documentation	Are all elements correct? (e.g., trademark symbol, color scheme, size, etc.) If not, describe in Nonconformities below.															
Website		Y <input checked="" type="checkbox"/> N <input type="checkbox"/>															
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Log Load Tickets		Y <input checked="" type="checkbox"/> N <input type="checkbox"/>															
Forest Management Plans		Y <input checked="" type="checkbox"/> N <input type="checkbox"/>															
1.2 Trademark License Agreement and valid certificate 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>		Maintained on file by SCS Main Office															
Evidence 1.2: Maintained on file by SCS Main Office.																	
1.6 Product Group List The products intended to be labeled or promoted as FSC certified have been included in the organization’s certified product group list.		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS															
Evidence 1.6: <input checked="" type="checkbox"/> Refer to Product Groups List in Public Summary Report; <input type="checkbox"/> The following nonconformance(s) were detected in Product Groups: ; or <input type="checkbox"/> Refer to OBS related to Product Groups:																	

<p>1.3 Trademark License Code The FSC trademark license code assigned by FSC to the organization 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>1.4 Trademark Symbol 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 checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, one or more of noted exceptions applies</p>
<p>2.1 Restrictions on using FSC trademarks The organization has not used the FSC trademarks in the following ways: a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the organization, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names; 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.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS</p>
<p>2.2 Translations 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>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, no translations</p>
<p>Evidence 1.3, 1.4, 2.1, and 2.2: <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected ; or <input type="checkbox"/> Refer to OBS:</p>	
<p>Sections 8 and 9 Graphic Rules The organization has only used FSC logos that conform to the standard requirements governing: • color and font (8.1-8.3); • format and size (8.4-8.9); • label placement (8.10); and</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS</p>

<ul style="list-style-type: none"> • ‘Forests For All Forever’ marks (9.1-9.7). 	
<p>1.5 Trademark Use Approval The organization has submitted all intended uses of the FSC trademarks to SCS for approval. OR The organization has an approved trademark use management system in place. (If the organization has a trademark use management system, complete Annex A.)</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS
<p>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.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, trademarks no used for segregation marks/ no se usan las marcas registradas en marcas de separación
<p>Evidence Graphic Rules, 1.5, and 4.6: <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected ; or <input type="checkbox"/> Refer to OBS:</p>	

2. On-Product Use of FSC Trademarks
 NA, no use of on-product trademarks (*on-product checklist may be deleted*)

3. Promotional Use of FSC Trademarks
 NA, no use of promotional trademarks (*promotional checklist may be deleted*)

<p>6.1 Catalogues, Brochures, and Websites When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:</p> <ul style="list-style-type: none"> • It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc. • 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. • If some or all of the products are available as FSC certified on request only, this is be clearly stated. 	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, not using trademarks in catalogues/ brochures/websites/
<p>6.2 Sales and Delivery Documents</p>	<input type="checkbox"/> C

<p>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 the invoices does not qualify as FSC trademark use.</i></p>	<p><input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not using trademarks on templates for FSC & non-FSC products</p>
<p>6.3 Promotional Items 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>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not labeling promotional items</p>
<p>6.5 Trade Fairs When the FSC trademarks are used for promotion at trade fairs, the organization has: a) clearly marked which products are FSC certified, or b) add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed.</p> <p><i>NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.</i></p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not using trademarks at trade fairs</p>
<p>Section 6.6 and 6.7 Investment/Financial Claims 6.6 When investment companies or others are making financial claims based on the organization’s FSC certified operations, the organization has taken full responsibility for the use of the FSC trademarks. 6.7 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"/> NA, not making financial claims about FSC status</p>
<p>7.1 and 7.2 Other Forestry Certification Scheme Logos 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 checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, not using other scheme logos</p>
<p>7.3 Business Cards The FSC trademarks have not used on business cards to promote the organization’s certification. The FSC logo or ‘Forests For All Forever’ marks are not used on business cards for promotion. A text reference to the organization’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 checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, approval granted prior to July 1, 2011</p>
<p>7.4 Promotion with CB Logo 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>Evidence 6.1-6.3, 6.5-6.7, 7.1-7.4: <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above;</p>	

<input type="checkbox"/> The following nonconformance(s) were detected ; or	
<input type="checkbox"/> Refer to OBS:	

Annex A: Trademark use management system
 NA, not using a trademark management system (*Annex A checklist may be deleted*)

Annex B, Additional trademark rules for group FM certificate holders
 NA, not a group FM certificate or group does not use FSC trademarks (*Annex B checklist may be deleted*)