

Michigan Department of Natural  
Resources  
Forest Certification  
Management Review Report

May 7, 2013

**Approved by**

**DNR Resource Bureau Management Team**

**October 1, 2013**

# DNR Management Review Field Meeting

May 7, 2013

## I. Background

Management review process – how, why, expectations, and time line..... 2

## II. Surveillance Audit..... 4

External Audit Results..... 5

Statewide non-conformances from 2012 internal audits ..... 16

## III. Decision Items -Audit response for each functional program area.

1. Clarify the scope of certification ..... 17

2. Management Review ..... 17

3. ORV Program..... 17

4. Planning..... 17

5. Biodiversity ..... 18

6. DNR Approval Process for Intrusive Activity ..... 19

7. BMPs and RDRs ..... 19

8. Research ..... 19

9. Timber Sale Program..... 20

10. Staff Training ..... 20

11. Silviculture and Forest Regeneration ..... 20

12. Roads and Road Closures..... 21

13. Invasive Exotics ..... 21

14. Tribal ..... 21

15. Chemical Use ..... 21

16. Other..... 21

17. Work Instruction Revisions..... 22

Appendix A – Open NCRs from 2011 internal audits ..... 24

NOTE: As a result of the reorganization of FMD and some other Departmental reorganizational changes involving other Divisions, as of January 8, 2012, Forest Management Division (FMD) is now Forest Resources Division (FRD) and the Forest Resource Management Section (FRMS) is now the Forest Planning and Operations Section (FPOS).

### Management Review Participants

Forest Resources Division (FRD): Forest Planning and Operations Section Leader Debbie Begalle  
Forest Planning and Inventory Unit Leader David Price  
Forest Planning Specialist Scott Jones  
Field Coordinator Dennis Nezich  
Forest Certification Specialist (Vacant)  
UP and NLP District Supervisors: Jeff Stampfly, Bill Sterrett,  
Steve Milford

Wildlife Division (WLD): Assistant Division Chief Doug Reeves  
Field Coordinator Penney Melchoir  
UP and NLP Regional Supervisors Terry Minzey, Rex Ainslie  
NLP Field Operations Manager Brian Mastenbrook

Law Enforcement Division (LED): Sgt. Glenn Gutierrez

Fisheries Division (FD): Steve Scott

Parks and Recreation Division (PRD): Field Coordinator Anna Sylvester

## I. Background

In 2004, as part of a strategy to retain forest-based jobs and assure forest sustainability, Governor Jennifer M. Granholm directed the Department of Natural Resources (DNR) to pursue certification of the state forest system. In May 2004, the Legislature passed the Sustainable Forestry Act that requires certification of the 3.9 million acres of the state forest system. Michigan's state forest system was accredited in December 2005 under two forest certification standards, the Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC). Annual SFI and FSC surveillance audits are required in order to maintain certification status. Certification was granted for a five year period, with the original certificates expiring in December, 2010.

A Request for Proposals for recertification of the State Forest system was advertised in the summer of 2010. A contract was awarded to NSF International Strategic Registrations in partnership with Scientific Certification systems, the same companies that conducted the original certification audit. A recertification audit was conducted in October 2010, and certification certificates were renewed in December, 2010. The first annual surveillance audit conducted under the new certificate occurred October 17-20, 2011. The second annual surveillance audit was conducted October 16-19, 2012 and the results are found on pages 5-14. The next SFI and FSC surveillance audit is scheduled for October 7-11, 2013. In 2013, FSC will conduct an annual surveillance audit while SFI, which is now on a three year certification cycle, will conduct a recertification audit. In 2013, the SFI lead auditor position will transition from Mike Ferrucci (who has audited Michigan DNR since 2005) to Norman Boatwright.

### A. Requirements for Management Review and Continual Improvement

**FSC Objective 13.** To promote continual improvement in the practice of *sustainable forestry* and monitor, measure, and report performance in achieving the commitment to *sustainable forestry*.

**SFI Performance Measure 20.1.** *Program Participants* shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in *programs*, and to inform their employees of changes.

#### DNR Management Review Process

Work Instruction 1.2 establishes the Management Review process to promote continual improvement in the management of the state forest system. The purpose of the Management Review is to establish a systematic process for evaluation of forest management practices. The review includes a report of the previous year's implementation efforts and a formal management review meeting. The annual management review evaluates audit results for state forest operations, effectiveness of work instructions and any implemented changes relating to past audit results, and identifies changes or improvements necessary for continued conformance with FSC and SFI standards necessary to maintain certification.

#### Focus of Management Review Meeting:

Make management decisions to:

- a. Clear any SFI and FSC Corrective Action Requests (CARs) and implement DNR corrective action responses,
- b. Review unresolved Non-conformance Reports (NCR) from past internal audits and develop strategies to resolve them,
- c. Review pending actions decided at previous Management Reviews not fully implemented,
- d. Identify needed revisions to work instructions, and
- e. Identify other actions for continual improvement of state forest operations.

**DNR Internal Audits:**

DNR Work Instruction 1.2 specifies that internal audits be conducted annually. The Forest Management Units (FMUs) selected for internal audit in 2012 were Gwinn, Roscommon, and Sault Ste. Marie.

Based upon audit results, DNR internal auditors identified no “statewide” non-conformances (see page 16) that require attention during the 2013 Management Review.

Non-conformance reports from the 2011 internal audits that have not been closed out are listed in Appendix A. Comments in regard to these NCRs are noted.

**Implementing Program Improvements:**

1. Whenever possible, immediate changes will be made to remedy identified non-conformances.
2. The Forest Certification Team (FCT) will be responsible for ongoing management review of implementation and for recommending actions necessary to improve sustainable management of forest resources.
3. Division Management Teams will review decisions related to remedies and improvements.
4. The Resource Bureau Management Team will review and approve management review decisions that identify changes and improvements necessary at all Department levels to continually improve conformance with work instructions and standards.
5. Division Chiefs will ensure changes and improvements approved by the Resource Bureau Management Team are implemented via written communication to employees.

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

- a) The FRD and WLD Field Coordinators agree on a draft Management Review Report which will be forwarded to the FRD, WLD, FD, LED, and PRD Management Teams by May 31, 2013.
- b) Management Team comments on MRR due June 28, 2013 to Penney Melchoir who will review with the FCT Executive Committee.
- c) Send MRR to Resource Bureau Management Team for information by July 2013 with approval desired by August 2013.
- d) Send proposed WI revisions to Resource Bureau Management Team for information and approval as they are completed (preferably in August 2013).
- e) FRD District supervisors, WLD regional supervisors, LED Field Coordinator, PRD Field Coordinator, and Fisheries Division Unit Managers, and the Forest Planning and Operations Section Leader will ensure implementation of management review decisions following approval by the Resource Bureau Management Team.

## **II. 2012 Surveillance Audit**

The 2012 surveillance audit involved an evaluation of all FSC and SFI Corrective Action Requests (CARs) issued during the 2011 surveillance audit and an evaluation of select forest certification indicators included in the SFI 2010-2014 Standard and FSC-US Forest Management Standard (v1.0). Additionally, the SFI and FSC auditors closely reviewed changes within DNR (e.g., staffing, budget, land acquisitions, planning documents) pertinent to certification.

This year's audit involved a two-member team: Dr. Robert Hrubes (lead auditor for FSC) and Mike Ferrucci (lead auditor for SFI); both have been involved with the DNR forest certification program since 2005.

Wildlife Division Field Coordinator Penney Melchoir, FRD Forest Planning and Operations Unit Leader David Price, FRD Forest Certification Specialist Dennis Nezich (now the new FRD Field Coordinator), and FRD Planning Specialist Scott Jones accompanied the audit team during the entire audit. FRD Assistant Chief Scott Heather and Promotional Agent Beth Clute attended a portion of the audit. Other DNR staff involved during the audit are identified in the SFI and FSC audit reports.

The field audit began Tuesday, October 16 in the Baraga FMU with an overview of unit and district operations followed by a full day of field evaluation. Unlike other years, attendance by the SFI and FSC auditors was staggered, and on day one Robert Hrubes presided during the field review which focused on the FSC standard. On Tuesday evening, there was a special meeting hosted by FRD Chief Bill O'Neill that focused on FSC chain of custody issues for loggers and truckers. Both Mike Ferrucci and Robert Hrubes attended this session. Representatives from FSC US called in, and numerous representatives from the timber industry were present.

Wednesday, October 17 began at the Marquette OSC with a 1½ hour presentation on the Regional State Forest Management Plans (RSFMPs) by David Price and an overview of the RSFMPs communication/outreach plan by Beth Clute. Several other DNR staff were in attendance. The audit team then traveled to the Gwinn FMU and after introduction of field staff and brief overviews of field operations, everyone departed for the field. The auditors worked as a single team until noon and afterward split into two separate teams for the afternoon session.

Thursday, October 18 was spent in the Crystal Falls FMU. The day began with an overview of the unit operations at the Norway field office and then moved to field sites in Dickinson County. Robert Hrubes and Mike Ferrucci worked as a single team until Robert departed the audit in the early afternoon. Mike Ferrucci continued on with the field audit in the afternoon.

Friday, October 19 began with Mike Ferrucci conducting a desk audit at the Marquette OSC, which was followed by a closing meeting starting at 1pm. Robert Hrubes called in for the closing session.

Both lead auditors recommended continued certification under the SFI and FSC standards. The SFI and FSC Corrective Action Requests (CARs) from last year were closed. SFI will issue no new CARs and will recommend three opportunities for improvement. FSC indicated that one minor CAR would be issued along with five observations. After additional follow-up the following week, Robert downgraded the minor CAR to an observation.

The 2013 audit will be conducted the week of October 7. The four FMUs being considered by external auditors for next year include: Roscommon, Grayling, Pigeon River and SS Marie.

# Audit Results

## FSC Certification Decision:

### 4.0 RESULTS OF THE EVALUATION

#### 4.1 Existing Corrective Action Requests and Observations

<b>Finding Number: 2011.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): See due dates, in the requested correction action block, below.
<b>FSC Indicator:</b>	FSC US National Standard, Criterion 7.2
<b>Non-Conformity:</b> The Regional State Forest Management Plans remain unfinished. While some progress has occurred since the 2012 audit, the fact remains that completion of the Plans is years behind.	
<b>Corrective Action Request:</b> <ul style="list-style-type: none"> <li>a) Complete Task 10 of the "RSFMP SWC Approved Timeline -10.04.2011(1).xls" by March 1, 2012. That is, complete Draft 1 of the RSFMPs by the stipulated date. Note: This timeline, updated shortly prior to the 2011 annual audit, states that Task 10 is supposed to be completed by December 2011.</li> <li>b) Complete Ecoteam final approval of Draft 1 of the Regional State Forest Management Plans by May 1, 2012.</li> <li>c) Provide written evidence (e.g, copy of distributed public notice) that public review of the draft RSFMPs has been initiated by October 1, 2012.</li> </ul>	
<b>FME response</b> <i>(including any evidence submitted)</i>	<p>Correspondence sent by Dennis Nezych on March 1<sup>st</sup> 2012:</p> <p>Hello Robert, Part A of FSC CAR 2011.1 required that the first draft of the Regional State Forest Management Plans (RSFMPs) be completed and provided to the ecoteams for review by March 1, 2012. I am pleased to inform you that the three Draft plans for the Northern Lower Peninsula and the Eastern and Western Upper Peninsula were submitted to the Ecoteams yesterday.</p> <p>Copies of the memos sent by the Forest Resources Division Planning Specialists to the Ecoteam Chairs are attached. We are mailing a CD containing each of the plans to you and Mike Ferrucci as we are unable to send them via email due to the file size.</p> <p>As noted in the attached memos, the Ecoteams will complete their review of the plans, and send an updated draft along with documentation of any outstanding unresolved issues to the Division Management Teams for their review. This is to be completed by May 1, 2012, and should address Part B of the CAR.</p>

Please let me know if any additional information or documentation is needed at this point in time.

Thanks,  
Dennis Nezich

Correspondence sent by Dennis Nezich on May 3<sup>rd</sup>, 2012:

Hello Robert,  
Part B of FSC CAR 2011 requires that the DNR ecoteams complete their review of the Draft Regional State Forest Management Plans (RSFMPs) by May 1, 2012. This has been accomplished and the Northern Lower Peninsula, Eastern Upper Peninsula, and Western Upper Peninsula ecoteams have submitted the results of their review to the DNR's Statewide Council. The next step in our planning process is for the various Division Management teams to review and further refine the draft plans, address unresolved issues as identified by the ecoteams, and prepare revised draft RSFMPs for public review. Part C of this CAR requires that my department initiate public review of the draft plans by October 1, 2012.

My attachments provide documentation of the completion of ecoteam review. The two Upper Peninsula memos provide the dates of formal ecoteam and local management unit meetings, along with a summary of issues that need resolution at the next review level. The Northern Lower Peninsula memo does not provide local meeting dates, so a companion document was prepared that provides this information (along with a list of meeting participants). No unresolved issues were identified as part of the NLP ecoteam review.

Additional more detailed information can be provided if you need it, including summaries of the changes that the ecoteams made to the first versions of the RSFMPs which were sent to you in early April.

Please let me know if any additional information is required in order to clear part B of FSC CAR 2011.1.

Thank You,  
Dennis Nezich

Submitted with CAR Response:  
(To be completed by MDNR prior to the due date for this CAR)  
NLP Ecoteam Memo re RSFMP  
E UP Ecoteam Memo re RSFMP  
W UP Ecoteam Memo re RSFMP

W UP MA Memo to Statewide Council 04 30 2012  
NLP Memo to Statewide council RSFMP  
EUP MA memo to Statewide Council 04 30 2012  
NLP FMU RSFMP Meeting Dates and Participants

SCS review	<p><b>As of May 15, 2012:</b> SCS has reviewed the ongoing efforts to update the Regional State Forest Management plans, including the communications from MDNR and associated documentation. MDNR has met the two deadlines that have passed so far (the initial drafts and Ecoteam final approvals of the initial drafts). The third milestone to be assessed, whether public review has begun, will be reviewed during the 2012 surveillance audit. As a result, the CAR is being kept open until the October surveillance audit.</p> <p><b>Following the October, 2012 surveillance audit:</b> On the basis of the presentations made to the audit team on October 17<sup>th</sup> at the Marquette OSC, SCS concludes that <b>closure of Minor CAR 2011.1 is now warranted</b>. The basis for this conclusion are:</p> <ul style="list-style-type: none"> <li>• Public review by two state-wide standing committees—the FMAC and the TAC—was initiated on October 1, 2012; these committees are comprised of citizens representing a variety of interests</li> <li>• On October 15, 2012, DNR initiated a broad-scale public notice of the availability of the draft regional state forest management plans for review and comment, utilizing a variety of mechanisms such as the “Gov-delivery” press release mechanism as well as social media. Tribes were separately informed. Public presentations for the advisory committees and all interested stakeholders are scheduled to be held on October 25<sup>th</sup> and a week later, the latter being through use of a webinar.</li> </ul> <p>DNR also briefed the auditors on next steps in the plan review and finalization process</p>
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision:</i> Maintained for ongoing assessment

<b>Finding Number: 2011.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC US National Standard, Indicator 4.4.c
<b>Observation:</b> While the launch of unit-specific web pages is a positive development and one that enhances the robustness of the DNR’s web site, it remains a question as to the extent to which this method will actually result in affected stakeholders, such as neighboring landowners, being adequately informed about pending site-disturbing activities on the state forests.	

DNR should continue to actively explore other, more efficacious means of apprising, in advance, people who are possibly subject to direct adverse effects of management operations; the intent is to provide advance knowledge of planned activities so that affected parties may have an opportunity to express concerns or provide timely input.	
<b>Corrective Action Request:</b> Not applicable	
<b>FME response</b> <i>(including any evidence submitted)</i>	This Observation was discussed with DNR personnel during the October 17 <sup>th</sup> meeting at the Marquette OSC
<b>SCS review</b>	The SCS audit team concludes that it is appropriate to close this Observation.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

#### 4.2 New Corrective Action Requests and Observations

Note: No new Corrective Action Requests are being raised in conjunction with the 2012 annual surveillance audit.

<b>Finding Number: 2012.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
<b>FSC Indicator:</b>	Indicator 6.4.c
<b>Non-Conformity:</b> Not applicable	
<p><b>Observation:</b> Throughout much of 2012, development the Regional State Forest Management Plans required the dedication of staff resources that, to a substantial degree, were redirected from the Biodiversity Conservation Planning Process. Now that the RSFMP process is largely completed, it is important that staff resources are rededicated to completion of the BCPP/BSA process, which has suffered from numerous delays since at least 2008. Completion of the Biodiversity Conservation Planning Process, including key tasks such as delineating Biodiversity Stewardship Areas on the state forests and identifying compatible land uses for the BSAs, has been the focus of numerous FSC Findings since 2008 (CAR 2008.1, CAR 2009.1, OBS 2010.9, OBS 2010.19). The credibility of the FSC certification process as applied to Michigan DNR is not enhanced by this protracted delay.</p>	
<b>FME response</b> <i>(including any evidence</i>	

<i>submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2012.2</b>	
<b>Select one:</b>	<input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
<b>FSC Indicator:</b>	Indicator 5.6.a
<b>Non-Conformity:</b> Not applicable	
<p><b>Observation:</b> On one of the FMUs visited this year and across the western Upper Peninsula, there has been a substantial increase in the scheduling of timber harvests in compartments that are “out of year of entry.” While out of year of entry harvest scheduling may be warranted on the basis of stand level conditions and, to a degree, logistical considerations, a broad departure (e.g., 25% increase in out of year of entry harvesting) sustained over more than one year runs the risk of rendering invalid the DNR’s allowable harvest regulation process.</p>	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2012.3</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
<b>FSC Indicator:</b>	Indicators 1.5.a and 1.5.b
<b>Non-Conformity:</b> Not applicable	
<p><b>Observation:</b> A chronic problem that DNR has had to deal with is unauthorized encroachment onto State Forest lands by neighbors (e.g., private structures or roads partially or entirely located on State Forest land). As the problem has grown, DNR has initiated policies, initiatives and actions aimed to control encroachment. In the last few years, the Department has ramped up its effort and it intends to be less accommodating, with regard to resolution of specific cases, after the end of 2012. As of the time of the audit (October, 2012) DNR was anticipating the finalization of a new, stronger procedure for handling encroachment cases. To avoid a possible non-conformity, DNR should:</p> <ul style="list-style-type: none"> <li>• Finalize and implement the revised procedure</li> <li>• Provide support to field staff dealing with encroachment</li> <li>• Endeavor to improve on the current approach of checking only 10% of State Forest boundary lines per year (10-year cycle).</li> </ul>	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2012.4</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
<b>FSC Indicator:</b>	Indicator 6.3.a.1 and Indicator 6.3.f

<b>Non-Conformity:</b> Not applicable	
<b>Observation:</b> On the basis of individual initiative, some field foresters are designating small patch reserves within aspen clearcuts for the purpose of creating, over time, pockets of over-mature/senescent habitat conditions in that cover type. Conformity to Indicators 6.3.a.1 and 6.3.f would be enhanced if this approach to regeneration harvesting in the aspen cover type were more broadly practiced on the State Forests.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2012.5</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
<b>FSC Indicator:</b>	Indicator 7.3.a
<b>Non-Conformity:</b> Not applicable	
<b>Observation:</b> With the transfer of many State Forest campgrounds, pathways and boat ramps to DNR's Parks and Recreation Division, PRD personnel now play a direct role in implementing State Forest policies that are central to FSC certification. Accordingly, it is important that training of relevant PRD personnel is consistently and expeditiously pursued, state wide. As of October 2012, the transition and training process for PRD personnel was observed to be varied across the state forest system.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2012.6</b>	
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input checked="" type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Observations do not have response deadlines. The subject matter underlying the Observation will be addressed during the next surveillance audit.
<b>FSC Indicator:</b>	Indicator 5.4.b and Indicator 5.5.a
<b>Non-Conformity:</b> Not applicable.	
<p><b>Observation:</b> To enhance the benefits they generate to the citizenry of Michigan and to enhance the diversity of State Forest land uses, the Hunter Walking Trails located on the State Forests could be more effectively made known through:</p> <ul style="list-style-type: none"> <li>• Including their locations on maps made available to the public</li> <li>• Improving their signage</li> <li>• Connecting the Hunter Walking Trail program more effectively with the hunting public, through MI Hunt.</li> </ul>	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

## **SFI CERTIFICATION DECISION:**

### **Overview of Audit Findings**

The SFI Program of the Michigan DNR has achieved continuing conformance with the SFI Standard®, 2010-2014 Edition, according to the NSF-ISR SFIS Certification Audit Process. There were no new Minor Non-conformances.

Three opportunities for improvement were identified. These findings served to alert the Michigan DNR to areas that could be strengthened or which could merit future attention. They are reported as either new or continuing from previous audits.

### **New Opportunities for Improvement:**

There is an opportunity to improve response times to internal audit findings. SFI Indicator 20.1.3 requires “Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2010-2014 Standard.”

There is an opportunity to improve road maintenance, including frequency of road grading. SFI Indicator 2.3.3 requires “Use of erosion control measures to minimize the loss of soil and site productivity.”

### **Opportunity for Improvement Issued Previously and Continued for 2011:**

There is an opportunity to improve protection of regeneration from adverse effects of deer on natural regeneration. SFI Indicator 2.1.3 requires “Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both planting and natural regeneration.”

### **Review of 2011 Audit Findings and Disposition in 2012 Surveillance Audit**

In 2011 NSF-ISR determined that there were two minor non-conformances, both of which were closed based on evidence reviewed in the 2012 Surveillance Audit:

SFI Indicator 17.1.5 requires that “Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders and have a program to take into account the results of these efforts in planning.” 2011 Minor Non-conformance resolved, based on release of Draft Regional State Forest Management Plans and continuation of the Biodiversity Stewardship Areas planning effort. The 2011 finding had been: “Absent completion of the Regional State Forest Management Plans, and considering that the BSA process has been reset, conformance with this indicator was not completely demonstrated.

SFI Indicator 20.1.3 requires an “Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2010-2014 Standard.” 2011 Minor Non-conformance resolved, based on the 2012 Management Review decision to create a Forest Regeneration Team that will be tasked with

re-evaluating the DNR approach to dealing with the cervid herbivory issue, and charged with addressing forest regeneration issues and recommendations from the Regional Deer Advisory. The 2011 finding had been: “Annual review has not led to effective follow-up for one repeated internal audit Minor Non-conformance”.

In 2011 four opportunities for improvement were also identified, and three of these have clearly been resolved:

Resolved: Training records reviewed were complete.  
SFI Indicator 16.1.3 “Staff education and training sufficient to their roles and responsibilities.”  
(In 2011 there was an opportunity to improve completeness of employee training records.)

Resolved: Efforts to inform staff are sufficient.  
SFI Indicator 15.3.2: “Program Participants are knowledgeable about climate change impacts on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional or local programs.” (In 2011 there was an opportunity to improve staff knowledge of climate change models and impacts to wildlife and biodiversity.)

Resolved: Ample evidence of road planning was provided.  
SFI Indicator 2.3.7 requires “Road construction and skidding layout to minimize impacts to soil productivity and water quality. (In 2011 there was an opportunity to improve road planning efforts.)

Continued: There is an opportunity to improve protection of regeneration from adverse effects of deer on natural regeneration.  
SFI Indicator 2.1.3 requires “Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both planting and natural regeneration.”

### **Exceptional Practices:**

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

The Michigan DNR has an exceptional program to monitor and to implement BMPs.  
SFI Indicator 3.1.1 “Program to implement state or provincial best management practices during all phases of management activities.” And SFI Indicator 3.1.4 “Monitoring of overall best management practices implementation.”

The program to protect threatened and endangered species exceeds the requirements.  
SFI Indicator 4.1.2 “Program to protect threatened and endangered species.”

Public recreation opportunities are high-quality, diverse, and widely available.  
SFI Indicator 5.4.1: “Provide recreational opportunities for the public, where consistent with forest management objectives.”

Michigan Department of Natural Resources exceeds the standard in its support for research. SFI Indicator 15.1.1 requires “Financial or in-kind support of research to address questions of relevance in the region of operations.”

Michigan Department of Natural Resources has a Forest Certification Team, an active working group drawn from across the Michigan DNR with assignments for all SFI Performance Measures and Indicators, and a dedicated Forest Certification Specialist. SFI Indicator 16.1.2 “Assignment and understanding of roles and responsibilities for achieving SFI 2010-2014 Standard objectives.”

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

The next audit is a re-certification audit for SFI and an annual surveillance audit for FSC, scheduled for the week of October 7, 2013. This will be a review of the entire standard covering central office functions and operations at a sample of 4 of the 15 Forest Management Units.

## Statewide non-conformances from the 2012 internal audits

Statewide Internal Audit (IA) non-conformances are defined as non-conformances that appear in the majority of the three internal audits conducted in 2012, and which the lead auditor considers as being widespread and systemic in nature. Local or unit-level non-conformances were isolated lapses of conformance with forest certification work instructions.

No Statewide non-conformances were identified for 2012.

### Summary of Internal Audit non-conformances

WI	#FMUs w/NCRs	<u>Bold</u> indicates statewide non-conformance
1.1	1	Work instruction training needed for some staff (SSM)
1.2	1	Corrective action plans not implemented from previous internal audit (R).
1.3	None	
1.4	3	KW sightings not entered into stand inventory locked comments (G). ERA not included in GDSE data base (G). Lack of documentation of natural heritage data base checks (SSM)
1.5	None	
1.6	None	
1.7	None	
2.1	2	Regeneration time clock not being maintained (G). KW harvests not recorded on regeneration time clock and inventory records not updated following treatments (R).
2.2	2	PAP and PUER not filed in FMU records (R). FTPs and PAP not prepared for chemical treatment (SSM).
2.3	None	
3.1	2	Inventory not updated following completion for FTPs (G). FTP completion reports not prepared (R).
3.2	1	RDRs not prepared for damage to water control structures (R).
3.3	1	Request for LUOD not submitted by ecoteam for road closure (R).
5.1	None	
6.1	None	
6.2	1	Timber sale and recreational trails not adequately integrated (SSM).
6.3	None	
7.1	1	Minor oil spill from logging equipment not promptly cleaned up (SSM).
7.2	2	Not all illegal activities are reported to Unit Manager (G). Minor pipeline spill not cleaned up (R).
8.1	2	Staff training records incomplete (R). Staff training needs not ID'ed as part of performance appraisal process (SSM).
9.1	None	

### III. Decisions, corrective actions, direction, responsibility and time lines

#### **1. Clarify the scope of certification:**

Clarification: State Forest Campgrounds, pathway trailheads, trail corridors, and boating access sites located on the state forest, continue to remain within the scope of certification. The state forest system includes that land located in a forest compartment and evaluated in the compartment review process.

#### **Recommendation:**

The Work Instructions should be amended to reference the criterion for determining which lands are in or out of scope.

#### **2. Management Review (WI 1.2):**

**SFI OFI:** There is an opportunity to improve response times to internal audit findings. SFI Indicator 20.1.3 requires “Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2010-2014 Standard.”

FMUs to internally audit in 2013 include:

W UP and E UP Districts: Implement a new trial audit process on the SSM FMU and perhaps include other FMUs

E NLP District: Pigeon River Country and Grayling

W NLP District: Gladwin

#### **Recommendations:**

- The standard auditing procedure will be followed this year on most internal audits. However, a new audit procedure will be investigated in the upcoming year with a modified procedure experimentally conducted on the SSM unit.
- Include a representative from PRD on the Forest Certification Team (FCT).
- Redefine FCT purpose and role, and identify necessary team composition in the upcoming year.

#### **3. ORV Program:**

No Comments/Recommendations

#### **4) Planning (WI 1.3):**

**FSC Observation 2012.2:** On one of the FMUs visited this year and across the western Upper Peninsula, there has been a substantial increase in the scheduling of timber harvests in compartments that are “out of year of entry.” While out of year of entry harvest scheduling may be warranted on the basis of stand level conditions and, to a degree, logistical considerations, a broad departure (e.g., 25% increase in out of year of entry harvesting) sustained over more than one year runs the risk of rendering invalid the DNR’s allowable harvest regulation process.

Recommendation: The Department must be prepared to address this issue in regard to the Emerald Ash Borer, Beech Bark Disease, and Spruce Budworm salvage initiatives. The FRD Forest Operations and Planning Section will summarize actions and considerations in the management of forested stands with these health issues by the time of the October, 2013 external audit.

## **5) Biodiversity** (WI 1.4)

**FSC Observation 2012.4:** On the basis of individual initiative, some field foresters are designating small patch reserves within aspen clearcuts for the purpose of creating, over time, pockets of over-mature/senescent habitat conditions in that cover type. Conformity to Indicators 6.3.a.1 and 6.3.f would be enhanced if this approach to regeneration harvesting in the aspen cover type were more broadly practiced on the State Forests.

### Recommendation:

The State Silviculturalist will work with the FRD Silviculture and Regeneration Team to review current guidelines regarding aspen retention, and will make a recommendation regarding leaving patches or individual aspen trees and recommend related potential revisions to the DNR within-stand retention policy by Oct 1, 2013.

**FSC Observation 2012.1:** Throughout much of 2012, development the Regional State Forest Management Plans required the dedication of staff resources that, to a substantial degree, were redirected from the Biodiversity Conservation Planning Process. Now that the RSFMP process is largely completed, it is important that staff resources are rededicated to completion of the BCPP/BSA process, which has suffered from numerous delays since at least 2008. Completion of the Biodiversity Conservation Planning Process, including key tasks such as delineating Biodiversity Stewardship Areas on the state forests and identifying compatible land uses for the BSAs, has been the focus of numerous FSC Findings since 2008 (CAR 2008.1, CAR 2009.1, OBS 2010.9, OBS 2010.19). The credibility of the FSC certification process as applied to Michigan DNR is not enhanced by this protracted delay.

### Recommendations:

- The Management Review Team requests that the Department's Resource Bureau Management Team provide guidance in regard to future program direction of the Biodiversity Conservation Planning Process. It appears that both SFI and FSC auditors are highlighting this issue so direction is needed before the October surveillance audit.
- Staff training will be provided as needed on how to evaluate the impact of proposed treatments on T&E species.

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

<i>Continuing from 2008, 2009, &amp; 2010</i>	In coordination with other DNR Divisions, the FRD Forest Resource Management Section (FRMS) is taking the lead in developing a Department policy and procedure that clearly outlines the procedure for preparing Forest Treatment Proposals and Completion reports and the subsequent updating of forest inventory records.
Decision in 2011	The FTP process (and the new IFMAP activity tracking process that will replace it) needs to be documented and distributed to staff along with training by the FRMS Section by October, 2011. WI 3.1 will need to be updated to reflect the new activity tracking process. Staff need to routinely document completion of treatments and District Supervisors need to follow up and ensure implementation per work instructions and previous management review guidance.
Recommendation 2012	The FRD Forest Planning and Operations Section will provide interim guidance to DNR staff on the FTP procedure to follow until the IFMAP activity tracking (or other mechanism) is fully implemented.

**Recommendation re: FTP process:** Interim guidance is a continuing need, and should be provided by the FRD Planning and Operations Section by August 1, 2013.

**Recommendation re: amending the intrusive activity approval procedure:** Field Coordinators/Basin Coordinators from FRD, FD, PRD, WLD and LED will identify potential changes to the intrusive activity approval process (forest treatment proposals, timber sale proposals, land use permits, recreational trail proposals, etc) by July 12, 2013. Proposed revisions to WI 3.1 will be recommended for approval by the Division Management Teams and the DNR Resource Bureau Management Team.

**7) BMPs and RDRs (WI 3.1 & 3.2)**

**Recommendation:** FRD and FD will continue to support the SFI Statewide Implementation Committee’s annual BMP monitoring program via FRD and FD staff support in the Michigan BMP audit process.

**8) Research (WI 5.1)**

**SFI OFI:** There is an opportunity to improve protection of regeneration from adverse effects of deer on natural regeneration. SFI Indicator 2.1.3 requires “Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both planting and natural regeneration.”

Carry over Corrective Action from 2012	A Forest Regeneration team (with staff from FRD, PRD and WLD) will be created and be asked to re-evaluate the DNR approach to dealing with the cervid herbivory issue. The FRD Forest Planning and Operations Section leader and WLD Field Coordinator will review the October 2006 cervid
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	herbivory report, membership, and initial charge to the cervid herbivory team, and prepare a new charge to address forest regeneration issues and recommendations from the Regional Deer Advisory Teams.
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Recommendation:

The FRD District Forest Managers must emphasize the forest regeneration tracking procedure (WI 2.1) and ensure problem sites are reported by field staff to the TMS. Data will be aggregated statewide and observations will be compiled by the District TMS for determination of actions to take. Timber Management Specialists will ensure staff are using the correct inventory coding to meet objectives. If needed, the S&R Team will make recommendations for regeneration techniques and keep staff abreast of relevant research findings.

**9. Timber Sale Program** (WI 1. 7)

Recommendation: None at this time.

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

**FSC Observation 2012.5:** With the transfer of many State Forest campgrounds, pathways and boat ramps to DNR’s Parks and Recreation Division, PRD personnel now play a direct role in implementing State Forest policies that are central to FSC certification. Accordingly, it is important that training of relevant PRD personnel is consistently and expeditiously pursued, state wide. As of October 2012, the transition and training process for PRD personnel was observed to be varied across the state forest system.

Recommendations:

- The FRD Field Coordinator will develop a training PowerPoint for PRD staff and will provide an overview of the forest certification program for each PRD District having State Forest Lands.
- PRD staff expected to be engaged in internal and external audits will receive pre-audit training.

**11. Silviculture and Forest Regeneration** (WI 2.1, 5.1)

**SFI OFI:** There is an opportunity to improve protection of regeneration from adverse effects of deer on natural regeneration. SFI Indicator 2.1.3 requires “Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both planting and natural regeneration.”

Carry over Recommendation from 2012	Silvicultural guidance for jack pine, aspen, and northern hardwood cover types will be finalized by August 1, 2012. (Note that the preceding section recommended that FRD conduct silvicultural training for DNR staff by March 30, 2013.)
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Recommendation 2013: The FRD Planning and Operations Section shall finalize silvicultural guidelines for the three noted cover types by August 1, 2013.

**12. Roads and Road Closures** (WI 3.3)

**SFI OFI**: There is an opportunity to improve road maintenance, including frequency of road grading. SFI Indicator 2.3.3 requires “Use of erosion control measures to minimize the loss of soil and site productivity.”

Recommendations:

- FRD will provide funding for R&B and RDR work, and will continue to implement approved ORV Grant restoration projects. The Department continues to search for additional funding sources, to rank and accomplish priority RDR projects.
- Field Coordinators/Basin Coordinators are working to identify options for replacing the ecoteams’ role in addressing road closures.

**13. Invasive Exotic Plants** (WI 2.3): No action required

**14. Tribal** (WI 9.1)

Recommendations:

- The FRD Tribal Coordinator will work to facilitate meetings between local FRD staff and local tribes in order to share work plans and to identify opportunities for coordinated assessment, restoration, and enhancement work.
- The Department Tribal Coordinators will meet together annually to discuss tribal outreach and collaboration in order to coordinate with the Tribes and learn from our experiences and coordinate collaborative efforts.

**15. Chemical Use** (WI 2.2)

FSC requires annual reporting of all pesticide use on certified lands. Work the reporting requirements for FSC into a query of the new FTP process that will be developed.

**16 Other**

**FSC Observation 2012.3**: A chronic problem that DNR has had to deal with is unauthorized encroachment onto State Forest lands by neighbors (e.g., private structures or roads partially or entirely located on State Forest land). As the problem has grown, DNR has initiated policies, initiatives and actions to aimed to control encroachment. In the last few years, the Department has ramped up its effort and it intends to be less accommodating, with regard to resolution of specific cases, after the end of 2012. As of the time of the audit (October, 2012) DNR was anticipating the finalization of a new, stronger procedure for handling encroachment cases. To avoid a possible non-conformity, DNR should:

- Finalize and implement the revised procedure,

- Provide support to field staff dealing with encroachment,
- Endeavor to improve on the current approach of checking only 10% of State Forest boundary lines per year (10-year cycle).

Recommendation:

- The ERI will receive focused attention in 2013 in order to complete this initiative.
- A new DNR trespass procedure is under development.

**FSC Observation 2012.6:** To enhance the benefits they generate to the citizenry of Michigan and to enhance the diversity of State Forest land uses, the Hunter Walking Trails located on the State Forests could be more effectively made known through:

- Including their locations on maps made available to the public
- Improving their signage
- Connecting the Hunter Walking Trail program more effectively with the hunting public, through MI Hunt.

Recommendation:

WLD has two work groups working on this issue (regarding the posting to MiHunt) and the regions also added this trail work to project lists for more partnership efforts and also for a volunteer project standpoint. This "program" is continuing and may be expanding slightly, particularly in light of the hiring of a new MUCC volunteer/grassroots coordinator.

**17. Work Instruction Revisions – Recommendations:**

Due to Department reorganization and the shifting of program responsibilities among DNR Divisions, the work instructions will require further future revision to consider new roles and responsibilities.

The Unit Supervisor for the FRD Forest Planning and Inventory Section will incorporate the following recommendations regarding changes to work instructions and forward to the FCT for concurrence, and then forward to the Department Management Teams and Department’s Resource Bureau Management Team for review and approval.

WI	Recommendation for Revision or clarification of Work Instructions
ALL	<ul style="list-style-type: none"> <li>• Revise all work instructions to identify the roles and responsibilities that the Resource Bureau Management Team will assume following decommissioning of the Statewide Council.</li> <li>• Revise references to ecoteams, and ID replacement.</li> <li>• Replace FMFM Division with FRD Division.</li> <li>• Replace DNRE with DNR</li> </ul>
1.1	<ul style="list-style-type: none"> <li>• Include PRD as an affected Division</li> <li>• Reference the criterion for determining which lands are in or out of scope.</li> </ul>
1.2	<ul style="list-style-type: none"> <li>• A significant change in the management review process is that the Resource Bureau Management Team will oversee the management review process and approve</li> </ul>

	<p>management review decisions.</p> <ul style="list-style-type: none"> <li>• Include PRD as an affected Division</li> </ul>
1.3	<ul style="list-style-type: none"> <li>• Scrap plan to develop Ecoregional Resource Plans.</li> <li>• Revise date for completion of the RSFMPs.</li> <li>• Re-structure to address plan implementation, monitoring, and revision.</li> </ul>
1.4	<ul style="list-style-type: none"> <li>• Incorporate an ability to edit ERA boundaries that arise in the course of management review.</li> <li>• Provide criteria/authorization for updating ERA designations based upon new information (add new ones or delete ones that no longer meeting criteria)</li> <li>• Re-evaluate or scrap the BSA definition.</li> <li>• Move mapping and coding instructions for SCAs/HCVAs/ERAs to the IFMAP manual.</li> <li>• Revise Potential Old Growth Management Direction</li> </ul>
1.5	Include PRD as an affected Division
2.1	Revise to delete references to OI manual and update with role and responsibility of DFMs for ensuring regeneration checks are completed and documented.
2.2	<ul style="list-style-type: none"> <li>• Update designated lead for approval of changes to acceptable chemical list.</li> <li>• Identify role of land use specialists.</li> <li>• Pesticide Use Application Plans need revision to collect more relevant information.</li> </ul>
3.1	<ul style="list-style-type: none"> <li>• Update the intrusive activity approval procedure as necessary.</li> <li>• Include PRD as an affected Division</li> <li>• Incorporate FTP procedure into WI</li> </ul>
3.2	Include PRD as an affected Division
3.3	<ul style="list-style-type: none"> <li>• Identify what will replace the ecoteam in the road closure procedure.</li> <li>• Include PRD as an affected Division?</li> </ul>
6.2	<ul style="list-style-type: none"> <li>• Include PRD in part B on page 1.</li> <li>• Roles and responsibilities of recreation specialists has changed</li> </ul>
8.1	Incorporate PRD training process into WI

## Appendix A:

### Open Non-Conformance Reports (NCRs) from the 2011 internal audits

(Management Review Team comments are italic red print)

NCR #	Description	Management Review Recommendation
61-2011-4	At the Lake Dubbonet Trail Camp oak wilt treatments (vibratory plow and herbicide treatments of stumps) were not supported with the proper documentation – FTP, PAP, PEUR, FTP completions.	There has been no recent chemical treatments applied allowing verification of conformance. UM Comment: When an intrusive activity takes place within the Unit, no matter who is coordinating the efforts, the Unit will handle all paperwork. <i>Confirm in next internal audit.</i>
12-2011-3	<ul style="list-style-type: none"> <li>• Northern hardwood stands are coded in forest inventory with a northern hardwood management objective in an all-aged condition.</li> <li>• Northern hardwood stands are prescribed for thinning rather than selection harvest due to concern about obtaining adequate regeneration. In time, repeated thinning will perpetuate an even aged condition and may not be sustainable.</li> <li>• There is a disconnect between the state level direction (SF Plan) on Northern Hardwood management and the realities of field conditions in the Crystal Falls unit and likely in nearby units.</li> </ul>	<p>Parts 1 and 2 of this NCR corrective action remain open. The Forest Regeneration Team has not been appointed and guidance on coding issues not documented.</p> <p>1) ...The FRM Section Manager will promote the reinstatement of the cervid herbivory team, or a similar committee, to review and make suggestions for addressing the issue. <i>Addressed in previous management review decision</i></p> <p>2) In the meantime, coding of treatments in forest inventory in areas where cervid herbivory is a problem will be clarified by memo to FMU staff. <i>FRD Field Coordinator will consult with inventory specialist and will provide direction to DFMs to resolve coding issues.</i></p>
12-2011-5	FTP F12-40 has been using trees from compartment 176, stands 33 and 34. Per work instruction 3.1 it is required to check for rare and endangered species as well as historical sites for treatments that are done “Out of Entry”. This did not appear to be done and upon further investigation the sections containing the stands have archeology concerns listed in the GDSE.	Corrective action: Fisheries staff will work with FRD staff to insure all necessary checks are made with MNFI and SHPO for FTP’s involving intrusive activities that are in scope for Forest Certification. <i>Confirmation needed from Fisheries Division. Revise FTPs to include check box to confirm that MNFI, OSA, and other checks were completed.</i>
42-2011-1 & 42-2011-3	<p>The FRD District Supervisor did not appear to monitor implementation of the corrective action plan as detailed in the 2006 internal audit report, “Operators will be continually reminded that they need to wear PPE when outside their equipment to meet both MIOSHA regulations and state timber contract requirements. Violations of the PPE requirements will be recorded against the 7 warnings allowed on applicable contracts.”</p> <p>DNR Staff on both tours were confused regarding what was required by the PPE requirements of WI 7.1.</p>	District Manager verification needed in regard to Newberry staff being informed about PPE requirements and that contractor notification was completed. <i>DFM will provide verification.</i>
42-2011-5	<p>Training plans were not developed as part of the annual performance review for district roving forester and a unit forester.</p> <p>Division training records did not reflect all courses completed by district and unit foresters.</p>	Verification of implementation needed <i>DFM will verify as part of the next performance appraisal for these staff.</i>