



2017 FOREST CERTIFICATION MANAGEMENT REVIEW REPORT

SECOND DRAFT REPORT
APPROVED BY THE DNR RESOURCE BUREAU MANAGEMENT TEAM
MAY 10, 2017

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BACKGROUND

Michigan's state forest was dual certified in 2005 by the Sustainable Forestry Initiative (SFI) and the Forest Stewardship Council (FSC). Each of these certification systems comes with a set of forest management standards to which the state forest management system is expected to conform, and both standards encourage continual improvement of the forest management system.

The SFI Principle 14 Objective 20 addresses the need for continual improvement and the requirement for an annual management review.

The FSC standard does not explicitly address the concept of 'continual improvement', but it is implied through Principle 8: Monitoring and Assessment, where monitoring is used to achieve continued improvement.

MANAGEMENT REVIEW PROCESS

The Michigan Department of Natural Resources (DNR) Forest Certification Work Instruction (WI) 1.2 establishes both the management review team and the management review. The review is a systematic process to evaluate forest management practices and to promote continual improvement in the management of the state forest system. The review is based on the results of the internal and external audits and includes:

1. A report of the disposition of 2015 audit results;
2. An evaluation of 2016 audit results;
3. A report of actions immediately taken to address new audit findings;
4. Identification of pending actions needed to address new audit findings; and
5. An assessment of the effectiveness of work instructions.

FOCUS OF MANAGEMENT REVIEW MEETING

Discuss and make management decisions to:

1. Address any SFI and FSC corrective action requests (CARs) and assign implementation responsibility;
2. Address unresolved non-conformance reports (NCRs) from past internal audits; develop strategies to resolve them and assign implementation responsibility;
3. Address pending actions proposed at previous management reviews that are not fully implemented;
4. Identify needed revisions to work instructions; and
5. Identify other actions for continual improvement of state forest operations.

RECOMMENDED TIMELINE FOR REVIEW OF MANAGEMENT REVIEW

1. The Forest Certification Coordinator will produce a draft management review report for the management review meeting at the RAM Center on February 14, 2017.
2. The Management Review Team will agree on a draft Management Review Report and identify any needed work instruction revisions at the management review meeting. The draft report will be forwarded to the Forest Resources Division, Wildlife Division, Fisheries Division, Law Enforcement Division and Parks & Recreation Division management teams for comment by March 14, 2017.
3. Management team comments on the draft report and list of needed work instruction revisions are due on March 28, 2017 to the Forest Certification Coordinator, who will review with the Forest Certification Team Executive Committee.
4. The revised management review report and the list of revised work instructions will be sent to the Resource Bureau Management Team for information by April 6, 2017, with approval desired by May 9, 2017.

IMPLEMENTING PROGRAM IMPROVEMENTS

1. Whenever possible, immediate changes will be made to remedy identified non-conformances.
2. The Forest Certification Team 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 specifically in terms of impact and work load.
4. The Resource Bureau Management Team will review and approve management review decisions that identify changes and improvements necessary at all DNR 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 delegation to the appropriate manager.

DISPOSAL OF 2015 AUDIT RESULTS AND 2016 MANAGEMENT REVIEW REPORT

This section provides the disposition of implementation actions identified in the 2016 management review report to address 2015 external audit and internal audits findings. Details regarding the disposition of audit findings may be found in the published reports summarizing the 2016 external and internal audits.

EXTERNAL AUDIT FINDINGS

The 2015 external audit was a re-certification audit under both the SFI and FSC standards and focused on the Atlanta, Gaylord, Traverse City and Gladwin forest management units, as well as the central office in Lansing. There were two minor non-conformances and two opportunities for improvement findings from the SFI portion of the audit and five observations and two corrective action requests under the FSC standard. Based on the re-certification audits, it was recommended that the DNR be awarded Forest Stewardship Council certification as a “Well Managed Forest” and re-certification under the Sustainable Forestry Initiative Standard. Only one FSC observation remains open as all other 2015 FSC and SFI findings were closed during the 2016 surveillance audit:

- FSC Observation 2015.1 was written against FSC-US Indicator 4.4.a and remains open. The DNR should consider updating its assessment of the likely social impacts of management activities and incorporate this understanding into management planning and operations. Social impacts include effects on:
 - Archaeological sites and sites of cultural, historical and community importance (on and off the forest management unit);
 - Public resources including air, water and food (hunting, fishing, collecting);
 - Aesthetics;
 - Community goals for forest and natural resource use and protection (e.g., employment, subsistence, recreation and health);
 - Community economic opportunities; and
 - Other people who may be affected by management operations.
- FSC Observation 2015.2 was written against FSC-US Indicator 6.3.h and has been closed. The DNR should assess the risk of invasive species, set priorities for control and develop and implements a strategy to prevent or control invasive species including implementation of management practices that minimize the risk of invasive species establishment, growth and spread. The finding was modified to specifically address the differences in implementation in aquatic versus terrestrial ecosystems.
- FSC Observation 2015.3 was written against FSC-US indicator 6.6.e and has been closed. Work Instruction 2.2 includes a few pesticides (such as rotenone) that are authorized for use, but they do not appear in the “FY15 Annual Summary of Pesticide Use on State Forest Lands” report submitted by the DNR. It is not clear if all divisions, including Fisheries, are following the reporting instructions.

- FSC Observation 2015.6 was written against FSC-US indicator 8.5.a and has been closed. All non-confidential monitoring information should be available upon request and some updates are missing. Some information, stated as not being available, is available in other reports. Also some of the divisions' annual reports (Wildlife and Fisheries) are not linked to this page. The DNR should consider updating its public summary of monitoring results to fill in any gaps that it identifies.
- FSC Observation 2015.7 was written against FSC-US indicators 9.1.b and 9.1.c and has been closed. Management guidelines that document risks and appropriate options for the maintenance of high conservation value forest attributes and ecological reference areas are currently complete for only a sub-set of the high conservation value forests and none of these draft documents have been formally adopted. The DNR's draft plan to complete its public consultation of ecological reference areas is about to be implemented according to its established timelines. The DNR should supply documentation of progress towards making available to the public a summary of assessment results and management strategies for high conservation value forests that have been developed in consultation with qualified specialists, independent experts and local community members.
- Minor Corrective Action Request 2015.4 was written against FSC-US indicator 6.7.a and has been closed. In addition, an SFI Opportunity for Improvement (Objective 3, Performance Measure 3.1, Indicator 3.1.1) was issued for this same inconsistency. Not all contractors have the equipment necessary to respond to hazardous spills, and it is a requirement that DNR employees and contractors have the necessary equipment and training to respond to hazardous spills.
- Minor Corrective Action Request 2015.5 was written against FSC-US indicator 7.1.p and has been closed. The DNR's best management practices manual describes cases where certain equipment types or features are recommended based on sensitive conditions. However, the management plan does not include a general description and justification of the types and sizes of harvesting machinery and techniques employed on the forest management area to minimize or limit impacts to the resource. The management plan shall describe and justify the types and sizes of harvesting machinery and techniques employed on the management area to minimize or limit impacts to the resource.
- SFI Minor Non-Conformance was written against Objective 11, Performance Measure 11.1, Indicator 11.1.1 and has been closed. A written statement of commitment to the SFI standard has been communicated to all DNR staff on September 23, 2014; however, the statement did not specify the 2015-2019 Standard.
- SFI Minor Non-Conformance was written against Objective 11, Performance Measure 11.1, Indicator 11.1.5 and has been closed. The pre-harvest planning form has a checkbox used to indicate logger completion of the core training requirements. The new SFI standard has changed this requirement such that annual update training is now required. The Michigan SIC has defined this requirement to mean that a trained individual must have direct responsibility and must be on-site regularly. It was not evident that DNR has incorporated this change in the Work Instruction 7.1 or communicated it to field staff. In addition, the checkbox on the pre-harvest planning form was not being used consistently.
- SFI Opportunity for Improvement was written against Objective 14, Performance Measure 14.2, Indicator 14.2.2 and has been closed. The research portion of the annual report includes projects and expended funds that are not related to forest research.

INTERNAL AUDIT FINDINGS

There are no non-conformances remaining open from any internal audits prior to 2015.

The 2015 internal audits were conducted in the Atlanta, Baraga and Cadillac forest management units. There were no major non-conformances and only one minor non-conformance remains open. The 2015 Theme Audit of Work Instruction 7.1 resulted in four minor non-conformances addressing non-conformities in 14 of the management units. These non-conformances have all been closed.

Baraga Minor NCR 11-2015-09 is written against Work Instruction 6.2.2. There was an absence of state-wide direction or procedures to address volunteer work on the North Country Scenic Trail. This non-conformity

remains open and is discussed further in Pending Actions to Address New Audit Findings.

2016 MANAGEMENT REVIEW REPORT

The 2016 Management Review Report contained 25 recommendations for implementation in 2016 and all but 5 were implemented. The details of implementation are discussed below and the items that are incomplete have been carried over into Pending Actions to Address New Audit Findings section. The implemented recommendations were:

- Reinforcement of invasive species direction has been accomplished and Forest Resources Division staff has received appropriate training.
- It was decided that for completion of the root cause and corrective action for multi-unit non-conformances identified during the internal forest certification audits, it should be left to the local managers to develop rather than elevating that to a small team.
- A decision to continue the theme audit was made and it was agreed that the 2016 them audit would focus on Work Instruction 2.2: The application of pesticides and other chemicals on state forest lands.
- Forest Resources Division has prepared and provided to field staff an interim direction regarding best management practices related to the types and sizes of harvesting machinery and techniques for use until the best management practices manual is revised by DNR and DEQ.
- New direction related to the application of featured species direction for field staff has been provided by Wildlife Division.
- New management direction for potential old growth areas and additional management direction for ecological reference areas and designated habitat areas (DHAs) has been incorporated into Work Instruction 1.4.
- New direction with respect to the required check of the Natural Heritage Database and MiFI Opportunistic Field Survey has been developed and incorporated into Work Instruction 1.4, and modifications to the Geographic Decision Support Environment have been completed.
- Two ecological reference area management plans have been drafted (in consultation with qualified specialists, independent experts and local community members), reviewed and approved through the compartment review process.
- An updated socio-economic study will be carried out by an internal analyst once the new forest economist position is filled. It is expected that the report will be completed by the end of calendar year 2017.
- Forest Resources Division's web page has been updated with links to annual reports from other divisions, specifically Fisheries and Wildlife divisions.
- Work Instruction 1.6 dealing with the State Forest Inventory and Compartment Review has been updated to refer directly to the new DNR Policy and Procedure 32.22-2015 and will be kept for a few more years to ensure staff familiarity.
- A new Wildlife and Forest Resources divisions PERM project with MSU to identify silvicultural approaches for promoting diversity and sound management practices in northern hardwood forests has been initiated and staff has been provided summaries on earlier research and have had a training session provided.
- A new format for developing and reporting experimental silviculture projects has been developed for use by field staff. The new format has been communicated to all field staff in Forest Resources Division.
- The annual summary of pesticides was amended to include the use of rotenone and now Fisheries Division staff is aware that its use must now be reported on an annual basis.

- Work Instruction 3.1 has been updated with respect to the approval process for intrusive activities negating the need for a detailed MiFI user's manual and the mineral leasing process has been deemed not to be an intrusive activity and has been removed from the table in the work instruction.
- The required maintenance (Work Instruction 3.2) of the resource damage database has been addressed in the three units cited in the internal audit for failing to adequately maintain the database.
- Changes to the core training and continuing education requirements for loggers have been made and these new requirements are now reflected in both the work instruction (7.1), timber sale contracts and on the timber sale inspection form.
- Work Instruction 7.1 and the related forms, including the timber sale inspection form, have been modified to reflect the improvements suggested by the 2015 theme audit which looked at this work instruction across all 15 forest management units.
- The internal audit in one forest management unit identified a shortcoming in the performance review process for a Forest Resources Division staff and this shortcoming has now been addressed.

EVALUATION OF 2016 AUDIT RESULTS

There were neither major NCRs nor major CARs from either the internal or external audits. The 2016 external audit resulted in one observation and one minor CAR. The observation and minor CAR that will be addressed during the management review meeting are outlined in Pending Actions to Address New Audit Findings section. Other opportunities for improvement from the internal audits are detailed in Appendix I.

INTERNAL AUDIT FINDINGS

The internal audits were carried out from the end of June through early November on the Gwinn, Roscommon and Newberry forest management units and also resulted in the training of two new auditors -- both from Forest Resources Division. The audits found no major non-conformances, 16 minor non-conformances and 16 opportunities for improvement:

1. Gwinn Forest Management Unit – The audit identified no major non-conformances, no multi-unit non-conformances, 5 minor non-conformances and 4 opportunities for improvement.
2. Roscommon Forest Management Unit – The audit identified no major non-conformances, 0 multi-unit non-conformances, 8 minor non-conformances and 4 opportunities for improvement.
3. Newberry Forest Management Unit – The audit identified no major non-conformances, 0 multi-unit non-conformances, 3 minor non-conformances, and 8 opportunities for improvement.

Actions taken resulted in the closure of 12 minor non-conformances (see Implemented Actions to Address New Audit Findings section) and the remaining minor non-conformances are addressed in Pending Actions to Address New Audit Findings section.

THEME AUDIT FINDINGS

The 2016 Theme Audit focused on Work Instruction 2.2 – Application of Pesticides and Other Chemicals to State Forest Lands and was applied to all forest management units across the state forest. A total of 104 treatments were audited covering the last 10 years of operation. There were 32 (31%) that completely complied with the work instruction. In the remaining 72, treatments had multiple problems with respect to the implementation of this work instruction. The biggest issue was the absence of District Supervisor sign-off on the pesticide application plan for the public communication and notification. This was followed by incomplete forms which have negative implications to any type of cost-benefit analysis or effectiveness monitoring. The next largest set of issues involved missing completion reports, no pesticide use evaluation form, no signatures or sign off on the pesticide application plan (this is over and above the issue of missing pesticide application plans) and no review and approval of the application plan by another certified applicator.

It was agreed that there would be four non-conformance forms generated, one for each district, and that the District Supervisor would formulate the root cause and corrective actions. Revisions to the work instruction are discussed in Pending Actions to Address New Audit Findings section. It was also clear that the record keeping function may be at the root of many of the issues detected during the audit.

EXTERNAL AUDIT FINDINGS

The 2016 external audit was a surveillance audit for both standards and was carried out during the week of August 8, 2016, by Norman Boatwright (SFI) and Paul Pingrey (FSC) and focused on the Sault Ste. Marie east, Pigeon River Country and Cadillac forest management units. The audit resulted in one observation under the FSC Standard (Observation 2015.1 was carried over and re-numbered as 2016.1) and one minor non-conformances under the SFI standard.

Actions are in progress to address the one FSC observation and one SFI minor corrective action request (see Implemented Actions to Address New Audit Findings section). The remaining findings are discussed in Pending Actions to Address New Audit Findings section under the appropriate work instructions.

IMPLEMENTED ACTIONS TO ADDRESS NEW AUDIT FINDINGS

Following the external and internal audits, there is a concerted effort to expeditiously address and close each of the CARs, non-conformances, observations and opportunities for improvement. The three 2016 internal audits resulted in 16 minor non-conformances and 16 opportunities for improvement. Twelve of the non-conformances were closed and the actions taken are further discussed in this section. Four minor non-conformances remain open and the recommendations for addressing those non-conformances as well as some of the opportunities for improvement will be discussed in Pending Actions to Address New Audit Findings section. From the external audit, one FSC observation remains open and is discussed in Pending Actions to Address New Audit Findings section under Work Instruction 1.5 and the one SFI minor corrective action request has been addressed.

NCR 32-2016-01 cited Work Instruction 2.2 involving missing pesticide evaluation report, missing certified applicator approval, uncertainty over applicator licensing or supervision and a missing pesticide application plan. The unit has developed a check list for forest treatment proposals that will help to ensure that the appropriate paperwork is not missed. Revisions to the work instruction will address other aspects of this non-conformance. This non-conformance has been closed.

NCR 32-2016-02 cited Work Instruction 3.1 and concerned resource damage mitigation work within 500 feet of a large river that had no Fisheries Division approval. The requirements of this work instruction have been communicated to unit staff to help ensure future conformance. This non-conformance has been closed.

NCR 32-2016-03 cited Work Instruction 3.2 and concerned the lack of maintenance of the resource damage database as there were incomplete entries, missing completion dates and some with no useful information at all and a lack of awareness on behalf of the staff as to who was responsible for closing damage reports. Responsibility for maintaining the database has been assigned to the fire supervisor and staff has been instructed on the requirements of the work instruction to help ensure future conformance. This non-conformance has been closed.

NCR 32-2016-05 cited Work Instruction 8.1 and concerned staff not reporting non-DNR training, gaps in the Parks and Recreation Division record keeping system, as well as a lack of understanding as to what constituted a forest certification related training event. Staff has been instructed on the requirements of the work instruction and the need to report non-DNR training sessions to the Division Training Officer. The PRD supervisors have been reminded of the need to maintain a file of their employees' training records. This non-conformance has been closed.

NCR 42-2016-01 cited Work Instruction 2.1 and concerned a delay in the unit receiving regeneration survey and cultivation information needed to update the inventory. The unit has implemented a 30-day update period following the completion of cultivation work. This non-conformance has been closed.

NCR 42-2016-02 cited Work Instruction 2.2 and concerned two missing pesticide application plans and evaluation reports involving a forest treatment and a rotenone treatment. The unit manager will be more diligent in following up on the requirements of the work instruction and fisheries staff is now aware of the proper procedure in completing lake reclamations. This non-conformance has been closed.

NCR 42-2016-03 cited Work Instruction 3.1 for a project that failed to receive the appropriate public review and multi-division approval as directed by the work instruction. The unit manager has made all staff aware of the requirements of the work instruction and the need for multi-division review and approval. This non-

conformance has been closed; however, further discussion is recommended and the item has been carried forward to Pending Actions to Address New Audit Findings section.

NCR 71-2016-02 cited Work Instruction 3.1 and concerned a missing forest treatment proposal for a controlled burn. The unit has taken steps to ensure that Wildlife staff is aware of the requirements of the work instruction and how they apply to their work to prevent future occurrences. This non-conformance has been closed.

NCR 71-2016-04 cited Work Instruction 3.1 and concerned changes in prescriptions that required the Chapter 7 process, but none was evident. The unit has held a training session to inform staff of the work instruction requirements related to variances to help ensure future conformance. This non-conformance has been closed.

NCR 71-2016-06 cited Work Instruction 3.2 and concerned the lack of maintenance of the resource damage database as there were incomplete entries, missing completion dates and some with no useful information at all and a lack of awareness on behalf of the staff as to who was responsible for closing damage reports. A unit level training session has been held to enlighten staff on the workings and related requirements of maintaining the resource damage database to minimize the potential for future non-conformances. This non-conformance has been closed.

NCR 71-2016-07 cited Work Instruction 7.1 regarding a producer who did not have an oil spill kit on site during the audit. The unit has sent a letter to all contractors explaining the requirement of a spill kit on each sale. Staff has also been advised to check for this requirement as part of their routine sale inspections. This non-conformance has been closed.

NCR 71-2016-08 cited Work Instruction 7.1 and cited examples of missing contract amendments, missing quantification of pre- and post-harvest regeneration and missing performance and corrective actions documented on the field inspection report form. An awareness training session was held in the unit to remind staff of the importance of tracking sale requirements and using the timber sale inspection check list to document issues of compliance and the steps taken to address any issues. This non-conformance has been closed.

SFI Minor Corrective Action Request 2016.1 cited that the Michigan DNR uses the SFI Trademark on its website without the required license code. This corrective action request has been addressed and closed.

PENDING ACTIONS TO ADDRESS NEW AUDIT FINDINGS

The content of this section drives the main discussions at the management review meeting, as it requires the identification of a recommendation to resolve the issue and the assignment of a manager for implementation. The section is organized by work instruction group.

WORK INSTRUCTION GROUP 1: PLAN, MONITOR AND REVIEW

1.1 STRATEGIC FRAMEWORK

- Scope of Certification for rail trails is a carryover from the 2014 and 2015 Management Review Reports. The Forest Resources Division (FRD)/Parks and Recreation Division (PRD) Transition Team was to complete an issue statement by June 1, 2014 to inform staff and clarify whether or not rail trail corridors within the state forest were in scope for the purpose of forest certification. Presently, rail trails are within scope, but a final recommendation is pending.
 - **Discussion Points:** Dennis Nezich and Anna Sylvester completed a briefing paper in 2015 outlining various options to resolve rail trail issues along with the pro and cons of those options. They were subsequently asked to simplify the report and make a recommendation on disposition of the rail trails. Anna and Dennis have developed a recommendation and a draft concept for a memorandum of understanding, which has been supported by the PRD State Trail Coordinator and WLD Regional supervisors. The report is undergoing final edits and will be elevated to the respective Division chiefs by mid-March.
 - **Recommended Decision:** Complete the condensed version and submit to FRD Chief, WD Chief and PRD Chief for review and submission to the Resource Bureau Management Team for a decision.
 - **Responsible Manager:** Dennis Nezich and Anna Sylvester

- **Due Date:** March 15, 2017.
- Cadillac OFI 63-2015-01: The DNR uses the work instructions to guide planning, operations and review of state forest management. Currently, the work instructions seem to be lacking in providing guidance on invasive species management; especially management practices related to early detection, rapid response and decontamination.
 - **Discussion Points:** The decontamination guidelines for Forest Resources Division staff has been disseminated as well as the Quality of Life early detection and rapid response direction. The work instruction needs to be reviewed for consistency with the guideline direction.
 - **Recommended Decision:** Revise the work instructions (WI 2.3 and WI 3.1) to accommodate the new guidelines.
 - **Responsible Manager:** David Price
 - **Due Date:** May 9 2017 RBMT Meeting.

1.2 MANAGEMENT REVIEW PROCESS

- At the February 6, 2017 Forest Certification Team meeting two items were discussed that were recommended for elevation to the Management Review for discussion and direction.
 - **Discussion Points:** The first was regarding continuance of the theme audit and the level of extra work that it entails. The second item was regarding the continuation of using a single lead auditor for all internal audits given the impending retirement of the current Certification Planning Specialist who has been acting in this capacity. The new specialist may not be able to act in this capacity next year. The theme audit was intended to move away from the unit audits. It was intended to gain a more in-depth look by program leaders who know the details, but it does not include a field portion in the audit process. The theme audit could be modified to include some field aspect. Theme audit was thought to be focused on things we should be checking on anyway, but has added to the existing workload. Theme audit does point out systemic problems. Options are to reduce the number of unit audits to alleviate the increased workload, or unit audits and theme audits could be conducted in alternating years. More than one theme audit could be conducted in years where no unit adults are being done. There was broad level support for alternating unit and theme audits. There is support for continuing the lead auditor for all three unit audits. Keith Kintigh should participate in at least two internal audits this year to provide some continuity over the next couple of years. Probably do not need to bring another lead auditor up-to-speed this year.
 - **Recommended Decision:** Continue the use of one lead auditor; bring Keith Kintigh up-to-speed on the internal audits to provide continuity; do not conduct a theme audit in 2017 and conduct only a theme audit in 2018. Revise Work Instruction 1.2 accordingly.
 - **Responsible Manager:** David Price
 - **Due Date:** April 6, 2017.

1.3 REGIONAL STATE FOREST MANAGEMENT PLAN IMPLEMENTATION AND REVIEW

- No identified issues.

1.4 BIODIVERSITY MANAGEMENT

- **Discussion Points:** The requirement for potential old growth assessment has been completed in all units and the direction in the work instruction can now be removed.
- **Recommended Decision:** Revise Work Instruction 1.4 to remove the references to potential old growth.
- **Responsible Manager:** David Price

- **Due Date:** May 9, 2017.

1.5 SOCIAL IMPACT AND PUBLIC PARTICIPATION

- FSC Observation 2015.1: Indicator 4.4.a and its relationship to indicator 8.2.d.3. The DNR has not defined the frequency of updating its socioeconomic assessment and what socioeconomic variables or research questions within the categories of indicator 4.4.a should be evaluated to complete the assessment. The DNR should consider updating its assessment of the likely social impacts of management activities and incorporate this understanding into management planning and operations. Social impacts include effects on: archaeological sites and sites of cultural, historical and community significance (on and off the management unit (i.e., state forest)); public resources, including air, water and food (hunting, fishing and gathering); aesthetics; community goals for forest and natural resource use and protection (such as employment, subsistence, recreation and health); community economic opportunities; and other people who may be affected by management operations.
 - **Discussion Points:** Past study was from 2006 and was contracted out. Auditors felt that this study is out-of-date and that a new study should be undertaken. There is some information available from the Wildlife side (Frank Lupe) that might provide some information. There may also be some information available from the U.S. Fish and Wildlife Service at the national scale with application to the state scale, but not to the state forest scale. May be able to work through PERM.
 - **Approved Decision:** A new forest economist position has been established to complete a new in-house social-economic impact of state forest lands among other responsibilities and is in the process of being filled.
 - **Responsible Manager:** David Price
 - **Due Date:** December 31, 2018.

1.6 MANAGEMENT UNIT ANALYSIS

- **Discussion Points:** Suggestion is to just refer to the policy and remove the text of the work instruction. Purpose of the work instructions was to compile direction or document in one spot. Work instructions took the place of up-to-date policy when they were first written. Department policy speaks to non-certified lands as well – the work instructions apply to certified lands.
- **Recommended Decision:** Keep the work instruction text, but revise to add a reference to the DNR policy.
- **Responsible Manager:** David Price
- **Due Date:** April 6, 2017

WORK INSTRUCTION GROUP 2: FOREST REGENERATION AND CHEMICAL USE

2.1 REFORESTATION

- **Discussion Points:** Need to acknowledge and point to the FRD Forest Cultivation Field Operation Direction document that Jeff Stampfly has developed. The document clarifies the roles and responsibilities and addresses the annual plan for cultivation (it is an operational plan) – consequently, it may not belong in the work instruction. It has not yet been vetted with WD. Discussion supported the idea that it should not be in the work instruction at present.
- **Recommended Decision:** No current recommended changes. Re-evaluate once the guidance has been implemented for a year.
- **Responsible Manager:** David Price
- **Due Date:** None.

2.2 USE OF PESTICIDES AND OTHER CHEMICALS

- Chemical Derogations. The FSC International Board of Directors discussed plans for the upcoming revision of the FSC Pesticides Policy and approved the Terms of Reference of a stakeholder balanced Working Group to lead the revision. It was agreed that the Working Group shall prioritize the task of developing the fundamental approach towards the use of pesticides in certified operations. The Board then decided to suspend the need to apply for derogations for new active ingredients that were added to the FSC List of 'highly hazardous' pesticides until the Board has made a decision on this issue based on input from the Working Group on the future of derogations. The latest information from SCS Global is that a first decision about the derogation system and the new Highly Hazardous Pesticide list can be expected by mid-2017.
 - **Discussion Points:** The derogation request for permethrin (for Midland County mosquito control) has been denied by FSC and is being revised for resubmission. The joint derogation application for the use of emamectin benzoate and imidcloprid (coordinated by the PA DCNR) is completed, with no further action needed at this time. The use of rotenone may continue for 2016 since it was not on the old HHP list, but we will likely need to complete and submit a derogation request for use in 2018. The use of Zenivex E20 or E4 (etofenprox) may also continue for 2017 since it was not on the old HHP list, and Midland County may revert to use of this chemical if the derogation request for permethrin is not approved. We will likely need to complete and submit a derogation request for any use of etofenprox in 2018.
 - **Approved Decision:** Submit additional supporting documentation to the FSC Pesticide Committee for reconsideration of our 2016 derogation application for permethrin. Continue to develop a derogation application for rotenone. Extend the allowable use date for emamectin benzoate, imidcloprid, etofenprox and rotenone until December 31, 2017 or the effective date of the new FSC HHP list (whichever is earlier).
 - **Responsible Manager:** David Price and Darren Kramer (Fisheries Division).
 - **Due Date:** April 6, 2017
- NCR 71-2016-01 cited Work Instruction 2.2 and concerned missing pesticide application plans and pesticide use evaluation reports.
 - **Discussion Points:** The Roscommon Unit is investigating potential corrective action for this minor non-conformance. Future potential for this non-conformance should be minimized through revisions to the reporting requirement in Work Instruction 2.2.
 - **Recommended Decision:** Remove this as a non-conformance for the Roscommon unit audit and add to the theme audit. Clarify reporting requirements in Work Instruction 2.2.
 - **Responsible Manager:** David Price
 - **Due Date:** March 31, 2017
- 2016 Theme Audit addressed Work Instruction 2.2 and found 231 conformance problems. The recommendation from the audit team was a revision of the work instruction (see recommendations in Appendix III).
 - **Discussion Points:** Does the management review team wish to assign a small team to carry out the revisions or leave it to the Certification Planner to draft a revision based on the recommendation of the audit team?
 - **Recommended Decision:** The audit summary needs some further summarizing and the results sent to each district supervisor for development of the root cause and corrective action. Also, Keith Kintigh and Jason Hartman should revise the work instruction.
 - **Responsible Manager:** Don Mankee, Jeff Stampfly, Bill Sterrett, Steve Milford and David Price
 - **Due Date:** May 9, 2017

2.3 INTEGRATED PEST MANAGEMENT AND FOREST HEALTH

- A discussion of ecological reference area (ERA) management led to an observation that proper consideration is not being given to the potential spread of invasive species, as we do not require contractors to decontaminate equipment before operating in high quality areas of the state forest. Staff is currently aware of contractors operating in contaminated areas off the state forest and also working on the state forest without decontaminating the equipment.
 - **Discussion Points:** This topic also came up as a discussion item (it did not involve either auditor) in the external audit in Sault Ste. Marie east. The new invasive species guidelines do not require operators on state forest land to decontaminate their equipment prior to doing the work. If it is decided or recommended to pursue this requirement, the discussion will need to involve the forest industry and a proposed timeline for implementation. Staff is within its right to ask an operator to decontaminate before entering the ERA – follow ERA ‘plans’ when they address the threat from invasive species. This approach needs to be discussed with staff – and more training may be needed. We should and do have the ability to protect special areas. Need to clarify the work instruction to indicate that this does not apply to all areas.
 - **Recommended Decision:** Revisions to the work instruction are needed to clarify direction for equipment decontamination in special areas.
 - **Responsible Manager:** David Price
 - **Due Date:** May 9, 2017

WORK INSTRUCTION GROUP 3: BEST MANAGEMENT PRACTICES

3.1 FOREST OPERATIONS

- Newberry minor non-conformance 42-2016-03 resulted in some questions regarding the use of the forest treatment proposal to document such items as structures on the state forest. The argument is that they do not fit the forest treatment proposal format and that there are other mechanisms to ensure that the project is exposed and discussed by the appropriate audience. Such mechanisms include documentation reviewed through the compartment review, a land use permit, a volunteer agreement or a letter of intent with associated e-mail approvals from appropriate divisions.
 - **Discussion Points:** How can such projects be properly vetted without adding to the forest treatment proposal burden of work? Should Work Instruction 3.1 be modified to deal with these proposals? Can we deal with these proposals outside the forest treatment proposal (FTP) process? Can we use the trail proposal process to capture these types of projects? The work instruction allows for completion of an FTP or approval at compartment review. If it is outside the year-of-entry, then you could process it as a variance.
 - **Recommended Decision:** This has been addressed at the unit level, the work instruction accommodates this type of project and nothing further needs to be done. Unit managers will be reminded of this during their review of this report.
 - **Responsible Manager:** None required.
 - **Due Date:** None required.
- NCR 71-2016-05 cited Work Instruction 3.1 and concerned an oil well lease that was “out-of-compliance” with the conditions of the lease and with DEQ requirements. This non-conformance will be held open through next summer to provide time for the operator of the well site to carry out the necessary actions to bring the operation into full compliance.
 - **Discussion Points:** This non-conformance identified a host of issues with well sites in the area and resulted in a meeting between DEQ and DNR staff to iron out differences and form a plan to move forward to clean-up. The lessee has been contacted regarding necessary fixes to bring the operation into conformance with DEQ and DNR requirements, but

implementation will not be fully complete until late March of 2017. The lessee had not been contacted regarding conformance to DNR lease requirements.

- **Recommended Decision:** Allow unit staff to contact the lessee in regard to the requirements of the lease and ensure that compliance is gained. Steps are being taken to address the land stewardship issues and DEQ is addressing the environmental issues. More staff awareness of the issues and DNR responsibilities is warranted at unit meetings. Land use staff should be given the lead on this topic. The follow-up action has been recommended, but not fully implemented.
- **Responsible Manager:** Steve Anderson, Unit Manager, Roscommon Forest Management Unit
- **Due Date:** December 31, 2017
- NCR 71-2016-03 cited Work Instruction 3.1 and concerned inventory that has not been updated and missing forest treatment proposal and forest treatment completion reports.
 - **Discussion Points:** The Roscommon Unit is working on sorting out a root cause and corrective action for this issue.
 - **Recommended Decision:** Allow the unit to pursue corrective action.
 - **Responsible Manager:** Steve Anderson, Unit Manager, Roscommon Forest Management Unit
 - **Due Date:** March 31, 2017

3.2 NON-CONFORMANCE REPORTING

- No identified issues.

3.3 ROAD CLOSURES

- **Discussion Points:** Review the new road direction and include the direction document as a reference in the work instruction. As of January 1, 2019 notification of township government must occur prior to road closures (P.A. 288).
- **Recommended Decision:** Revise Work Instruction 3.3 accordingly.
- **Responsible Manager:** David Price
- **Due Date:** May 9 2017

WORK INSTRUCTION GROUP 5: RESEARCH

5.1 COORDINATED NATURAL RESOURCE MANAGEMENT RESEARCH

- No identified issues.

WORK INSTRUCTIONS GROUP 6: RECREATION AND EDUCATION

6.1 IMPLEMENTING PUBLIC INFORMATION AND EDUCATIONAL OPPORTUNITIES

- No identified issues.

6.2 INTEGRATED PUBLIC RECREATIONAL OPPORTUNITIES WITH MANAGEMENT

- Still on the books Internal audit NCR 11-2015-09 related to Work Instruction 6.2 cited that there was no up-to-date volunteer agreement for work conducted by volunteers on the North Country Trail on certified state forest land, nor was there a recording of volunteer hours as required by Parks and Recreation Division. Further investigation uncovered that the issue was statewide involving other trails. Parks and Recreation Division has developed a statewide solution that will be implemented to correct this non-conformance by June 1, 2017.

- **Discussion Points:** This issue was missed for the agenda for the 2016 Management Review, but a corrective action has been developed by Parks and Recreation Division and it was discussed at the April 25, 2016 meeting of the Forest Certification Team. Discussions between PRD and NCT staff is ongoing and are focusing on a maintenance form, but the ultimate solution to this issue should be uniform for the department (i.e., same procedure for PRD and FRD lands).
- **Recommended Decision:** Update the Memorandum of Understanding between DNR and NCT, introduce a maintenance form, improve direction to NCT with respect to volunteer agreements and improve communication between DNR and NCT and between PRD and FRD.
- **Responsible Manager:** Parks and Recreation Division Field Coordinator.
- **Due Date:** June 1, 2017.
- NCR 32-2016-04 cited Work Instruction 6.2 and involved a state forest campground that had been closed for 30 years, but had some infrastructure remaining, some of which was considered unsafe.
 - **Discussion Points:** The Gwinn forest management unit has requested an extension on completing the removal of the infrastructure until September 30, 2017.
 - **Recommended Decision:** Allow the unit to proceed with the corrective action as planned and extended.
 - **Responsible Manager:** Tom Seablom, Unit Manager, Gwinn Forest Management Unit
 - **Due Date:** September 30, 2017

6.3 SUSTAINABLE FORESTRY INITIATIVE INVOLVEMENT AND IMPLEMENTATION COMMITTEE

- No identified issues.

WORK INSTRUCTION GROUP 7: INTEGRATED IMPLEMENTATION AND CONTRACTING

7.1 TIMBER SALE PREPARATION AND ADMINISTRATION PROCEDURES

- No identified issues.

7.2 LEGAL COMPLIANCE AND ADMINISTRATION OF CONTACTS

- No identified issues.

WORK INSTRUCTION GROUP 8: TRAINING

8.1 STAFF TRAINING FOR STATE FOREST MANAGEMENT

- No identified issues.

WORK INSTRUCTION GROUP 9: TRIBAL

9.1 COLLABORATION WITH TRIBES REGARDING MANAGEMENT OF STATE FOREST LAND

- No identified issues.

ASSESSMENT OF THE EFFECTIVENESS OF WORK INSTRUCTIONS

The implementation of forest management and operations on the Michigan state forest is governed by a suite of 20 work instructions that are divided into eight categories. Internal audits assess management and operations against the requirements of all work instructions. External audits assess management and operations against the indicators in the two certification standards which are aligned with the work instructions.

The 2016 internal audits resulted in 32 findings categorized as minor non-conformances and opportunities for improvement. These issues were related to 10 of the 20 work instructions. The Plan, Monitor and Review work group had 3 findings; Forest Regeneration and Chemical Use had 9; Best Management Practices had 12;

Research had 1; Recreation and Education had 2; Integrated Implementation and Contracting had 4; Training had 2; and Tribal had none.

Including the findings of the external audit, the number of findings bumps up to 34 on 12 work instructions. Work Instruction 1.5, Social Impact and Public Participation had one additional finding and Work Instruction 6.3 Sustainable Forestry Initiative Involvement and the Implementation Committee had one additional finding. There were no multi-unit non-conformances found in 2016.

The need for improved management related to the issues is discussed in Pending Actions to Address New Audit Findings section and Approved Decisions will be identified during the management review meeting. Closed NCRs are discussed in Implemented Actions to Address New Audit Findings section.

A review of the audit findings across the eleven years (2005 – 2016) that internal audits have been conducted in Michigan shows some rather interesting results (Table 1). The review compares total audit findings and findings categorized as major non-conformances (including the new multi-unit non-conformances), minor non-conformances and opportunities for improvement for the twelve-year period. Overall, Work Instructions 1.4, 2.1, 3.1, 3.2, 7.1 and 8.1 continue to garner the most findings (Figure 1).

The work instructions that correspond to the major issues are related to biodiversity management, reforestation, forest operations, best management practices, timber sale preparation and training (Table 1, yellow highlights). A more detailed look at the results shows that most of the first group of work instructions, related to planning, review and monitoring, needs further attention in terms of compliance with the direction in the work instructions (first four points in Figure 1).

These findings could and should be used to focus the internal audits, theme audits and improvements to the management framework.

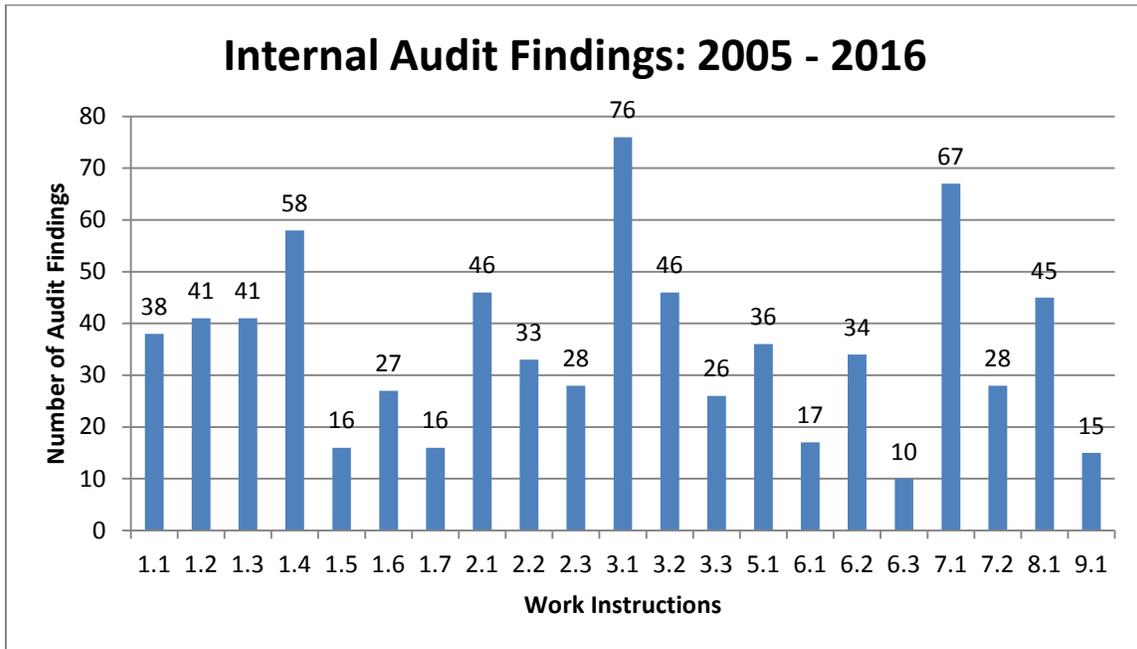
TABLE 1.1

Summary of Internal Audit Findings for the 2005-16 Period for the state forest in Michigan (Note: Work Instruction 1.7 is no longer used) (unpublished DNR data).

WORK INSTRUCTION	MJNCR	MINCR	OBS	TOTAL
1.1	9	12	17	38
1.2	9	18	14	41
1.3	16	11	14	41
1.4	12	19	27	58
1.5	3	2	11	16
1.6	10	5	12	27
1.7	6	2	8	16
2.1	7	18	21	46
2.2	3	18	12	33
2.3	6	7	15	28
3.1	9	44	23	76
3.2	7	16	23	46
3.3	7	8	11	26
5.1	6	13	17	36
6.1	0	0	17	17
6.2	8	12	14	34
6.3	0	2	8	10
7.1	9	38	20	67
7.2	0	17	11	28
8.1	7	22	16	45
9.1	3	6	6	15
Total	137	290	317	744

FIGURE 1.1

Graphical Summary of Audit Findings by work instruction for the eleven year period 2005-16 for the state forest in Michigan (unpublished DNR data).



2017 AUDIT SCHEDULE

INTERNAL AUDITS

2017 internal audits will be conducted on the Crystal Falls, Grayling and Traverse City forest management units. The dates are to be arranged with the respective unit managers. There will not be a theme audit in 2017.

EXTERNAL AUDITS

The 2017 Forest Stewardship Council and Sustainable Forestry Initiative audit will be a surveillance audit. The surveillance audit will be conducted on October 24-26, 2017 in the Baraga, Crystal Falls and Gwinn forest management units.

APPENDIX I

Opportunities for Improvement from the 2016 Internal Audits for the Gwinn, Newberry and Roscommon Forest Management Units.

Gwinn Forest Management Unit:

OFI 32-1, WI 2.2 Application of Pesticides and Other Chemicals on State Forest Land:

A greater effort needs to be put toward ensuring that all required information is entered on the required forms. In some cases (e.g., C32-730 (Forest Treatment Completion Report), C32-792 (Pesticide Use Evaluation Report) and C32-808 (Forest Treatment Completion Report)) the information was not complete. This has implications to monitoring and the development of annual summaries.

The pre-review meetings of the compartment review process will be used to encourage staff to be aware of the need to completely fill in the required information on forms related to timber sale administration and the application of pesticides on state land.

OFI 32-2, WI 2.3 Integrated Pest Management and Forest Health:

A discussion of ecological reference area management led to the observation that proper consideration is not being given to the potential spread of invasive species as staff is unable to require contractors to decontaminate equipment before operating in high quality areas of the state forest. Staff is currently aware of contractors operating in contaminated areas off the state forest and also working on the state forest without decontaminating the equipment.

This issue is beyond the scope of the forest management unit to resolve and will be discussed during the management review process. This issue is not addressed in the appropriate work instruction. Revision is necessary to resolve this issue and the solution will take some time to implement. The management review process is the appropriate vehicle for discussion and resolution.

OFI 32-3, WI 3.1 Forest Operations – Intrusive Activities:

It was noted in the paperwork for Forest Treatment Proposal W32-790 that the work pre-dated the signing of the sharecropping agreement. Good business practices suggest that all the required paperwork and approvals should be in place before the work is undertaken.

The pre-review meetings of the compartment review process will be used to ensure that staff is aware of the need to complete required paperwork in a timely fashion and in the proper sequence as a project unfolds.

OFI 32-4, WI 7.1 Timber Sale Preparation and Administration:

It was observed that staff was slowly transitioning into the new timber sale inspection forms (Form R4050 Revision Date 3/24/2016). Forms should be filled out completely at all times, logger training should be verified and documented and pre-sale meetings should be documented with attendees and details that were discussed. In some cases it was observed that this had not been taking place.

Staff will be reminded of the requirement of using the correct forms and completing the timber sale administration documents completely.

Newberry Forest Management Unit:

OFI 42-1, W.I. 1.4 Biodiversity Management:

More effort should be expended to identify and protect vernal pools. This may involve further training and more close examination of multiple layers of information and imagery.

Train staff on what a vernal pool is and what landscapes they may occur on. There are several new staff that have come on board since the last time training on vernal pools was offered. In the meantime, experienced staff will work more closely with newer staff. Also, any available datasets will be used that may offer relevant knowledge to vernal pool locations.

OFI 42-2, W.I. 1.4 Biodiversity Management:

Greater effort should be put to identifying hawk nests and entering them into the opportunistic field survey layer. The auditors recognized that this is not a straight forward procedure and that the system needs to be

modified to make this step easier to perform.

When a hawk nest is found it should be documented in the Opportunistic Field Survey layer. This again is something that staff could use some training on or written direction provided in a MiFI manual where folks could refer to. The OFS layer would build the baseline information to help make future decisions on what works/does not work in regard to nest protection.

OFI 42-3, W.I. 2.1 Reforestation:

The transition between OI, IFMAP and MiFI has resulted in an inefficient, messy system for tracking natural and artificial regeneration of stands. Splitting information into as many as 4-5 systems and databases creates numerous opportunities to lose track of stands and inefficient duplication of work effort. By allowing tracking of cultivation treatments, monitoring and other Next Step Treatments, MiFI promises to improve accuracy and efficiency of regeneration monitoring. The current Work Instructions, however, require Unit Managers and/or Stand Examiners to update MiFI based on FTP completion reports, which they are not receiving in a timely manner. Requiring the interim step of an FTP completion report creates a bottleneck in the flow of information and hampers staff ability to conform to Work Instructions.

There are a lot of moving parts in tracking reforestation efforts. Three inventory systems in the past decade have made this more difficult. Staff turnover and who has been delegated responsibility for tracking/updates makes matters more complicated. MiFI promises to make this process less cumbersome, but this system is still relatively new. In the interim, the plan is that the Unit Manager, Timber Management Specialist and lead forester for cultivation will meet periodically throughout the year to ensure completion reports are done and entered into MiFI. MiFI has some reporting features that are quite powerful in regard to planning.

OFI 42-4, W.I. 3.1 Forest Operations – Intrusive Activities:

On the forest treatment proposal log, the majority of proposals have no closure date listed, despite there being a column for this information. A greater effort should be made to ensure that this data/information is recorded. Addition of stand numbers may also be helpful.

There are a lot of moving parts to an FTP and when it is actually considered “closed” is difficult, especially when it is written for multiple treatments (i.e. scarify, trench and plant). Hence the reason why there are many dates not entered. A completion date will be entered into the log once the treatment proposal is removed from the book. MiFI is now the place where this information for completion dates of various treatments is being kept. When the treatment is advanced, the date is recorded there.

OFI 42-5, W.I. 3.2 Best Management Practices Non-Conformance Reporting Instructions:

The spreadsheet provided to the auditors does not match the information in the resource damage report database, as it does not include any incomplete sites. The unit should consider having the two data sources match.

There must have been something provided erroneously here as they should match.

OFI 42-6, W.I. 5.1 Research:

Field staff was unaware of the new direction for documenting and reporting on experimental silviculture projects. Greater effort should be put forth to ensure that new direction related to forest certification and work instructions changes and enhancements area communicated to staff in a timely fashion.

The Unit Manager will make a better effort to remind staff to work instruction updates.

OFI 42-7, W.I. 7.1 Timber Sale Preparation and Administration:

It was noted that on a couple of sales, information regarding the qualified logger and verification of training credits was not recorded on the form in the appropriate spaces.

An effort is being made to check the database when a sale is opened regardless of whether it was an old sale or new sale. The new inspection forms which include the qualified logger checkbox are now being used on all sales that are opened at Newberry.

OFI 42.8, W.I. 8.1 Training:

While divisions had well documented training records, Fisheries Division staff should broaden records to include less formal training opportunities such as: brown bag lunch sessions, guest speakers, thesis and dissertation defense, presentations, webinars and special presentations at staff, unit, district or section meetings.

The Newberry Unit Manager will pass this opportunity for improvement on to Fisheries staff.

Roscommon Forest Management Unit:

OFI 71-1, W.I. 1.4 Biodiversity Management on State Forest Lands:

Multiple staff were not familiar with work instruction 1.4. Specifically, when asked if certain locations were coded with designations as High Conservation Value Areas/Designated Habitat Areas and Ecological Reference Areas, they were unsure as to the designation and what it meant in terms of appropriate activities within those locations. Training on work instruction 1.4 is recommended.

OFI 71-2, W.I. 2.2 Application of Pesticides and Other Chemicals on State Forest Land:

Paperwork associated with all Forest Treatment Proposals must have copies included in the appropriate compartment file in the forest management unit office. It was found that forest treatment completion reports related to the application of herbicides were not consistently found in the compartment files in the forest management unit office. This is a continuation of a problem identified in the 2012 audit that has still not been completely addressed.

OFI 71-3, W.I. 2.3 Integrated Pest Management and Forest Health:

Many staff within the unit have had training regarding Forest Resources Division Guidelines for Decontamination Methods by Risk Level for Terrestrial Activities and Equipment. However, some have not yet had this training. Additional training on decontamination for staff that have not had the training previously should be held.

In addition, producers are not required to decontaminate equipment when moving between sales or prior to arriving on site. Requirements for producers should be developed statewide, and enacted as soon as practicable.

This issue is beyond the scope of the forest management unit to resolve and will be discussed during the management review process. This issue is not addressed in the appropriate work instruction. Revision is necessary to resolve this issue and the solution will take some time to implement. The management review process is the appropriate vehicle for discussion and resolution.

Oak wilt was noted as a growing issue in the unit. Resources and strategies need to be developed for field staff to help identify and treat areas affected. Implementation of strategies to prevent the spread of oak wilt, such as limiting right-of-way clearing operations to oak wilt timing specifications, are recommended. More staff training on identification and other methods for control should be enacted as well.

OFI 73-4, WI 3.1 Forest Operations – Intrusive Activities:

The Forest Treatment Log does not have a column for the closure date. Addition of such a column and efforts to keep it up-to-date may help to ensure that the appropriate paperwork is up-to-date and filed in the compartment files.

APPENDIX II

Opportunities for Improvement and Minor Non-Conformances from the 2015 Theme Audit of Work Instruction 7.1: Timber Sale Preparation and Administration Procedure

Opportunities for Improvement

Theme Audit OFI-1 WI 7.1 Timber Sale Preparation and Administration Procedures

Units should ensure that the required timber description is included when the Timber Sale Completion Report has a Status 2 code. This opportunity for improvement applies specifically to the Gaylord (T-Sale 521010901), Sault Ste. Marie (T-Sale 450091001), Pigeon River Country (T-Sale 530221001) and Grayling (T-Sale 726141101) forest management units.

Theme Audit OFI-2 WI 7.1 Timber Sale Preparation and Administration Procedures

Units should ensure that the bond value for a timber sale meets the minimum requirement of 5% of the appraised timber value. This opportunity for improvement applies specifically to the Gwinn Forest Management Unit (T-Sale 320070901).

Theme Audit OFI-3 WI 7.1 Timber Sale Preparation and Administration Procedures

Units should ensure that details with respect to the pre-sale meetings are entered in the appropriate space on the Field Inspection Report. There were 10 sales for which the pre-sale meeting date was not recorded. This opportunity for improvement applies specifically to the Gaylord (T-Sale 531370901), Sault Ste. Marie (T-Sale 451050701), Gladwin (T-Sale 730270801), Pigeon River Country (T-Sale 530100901), Grayling (T-Sale 726091101) and Newberry (T-Sale 420141201) forest management units.

Theme Audit OFI-4 WI 7.1 Timber Sale Preparation and Administration Procedures

Units should ensure that Timber Sale documentation is complete for all sales using the correct and current forms. Gladwin (T-Sale 730181001) had an incomplete checklist; Sault Ste. Marie (T-Sale 450010901) had no checklist and T-Sale 451130901 had the wrong inspection forms; and the Pigeon River Country (T-Sales 530051101 and 530041001) had wrong and incomplete inspection forms. Shingleton had three sales (410081401, 410121201 and 410151301) that could and should have used a more current version of form R4050.

Theme Audit OFI-5 WI 7.1 Timber Sale Preparation and Administration Procedures

All forest management units should ensure that the required information is entered on the Field Inspection Form and that it is legible. People's names should also be complete.

Theme Audit OFI-6 WI 7.1 Timber Sale Preparation and Administration Procedures

Field staff should ensure that field inspections be carried out on a regular basis (recommended to be once per week when the sale is active) and that the notes should be entered on the Field Inspection Form in a legible fashion and tell the complete story of the harvest operation.

Non-Conformances

TA-2015-01 written against Work Instruction 7.1 part 2a for one unit for failure to enter the date of the pre-sale conference on four of the ten field inspection forms.

TA-2015-02 written against Work Instruction 7.1 part 2b for one unit for failure to submit complete documentation for two of ten sales and incomplete or missing forms for two additional sales.

TAMUNCR-2015-03 written against Work Instruction 7.1 part 2a against five units for multiple incidents of failing to record pre-sale meeting dates and attendance; failing to record the name of the SFE trained foreman or verification of core training status; and failing to document any special features that require care or attention and any specific conditions not covered in the contract.

TAMUNCR-2015-04 written against Work Instruction 7.1 part 2b-2 against 11 units for failing to complete the payment unit information, specifically the start and finish dates.

APPENDIX III

Minor Non-Conformances from the 2016 Theme Audit of Work Instruction 2.2: Application of Pesticides and Other Chemicals to State Forest Lands

TA-2016-01 Written against the Eastern Lower Peninsula:

There were 10 instances of no variance for out-of-year-of-entry treatments, 1 instance of no pesticide application plan, 2 instances of no forest treatment completion report, 2 instances of no pesticide use evaluation report, 3 instances of no signatures associated on the forms, 2 instances of no review and approval by a second certified applicator, 7 instances of no district supervisor sign-off, 5 instances of incomplete forms and 1 instance of out-of-date forms.

TA-2016-02 Written against the Western Lower Peninsula:

There were 3 instances of no forest treatment proposal, 6 instances of no pesticide application plan, 7 instances of no forest treatment completion report, 5 instances of no pesticide use evaluation report, 6 instances of no signatures associated on the forms, 8 instances of no review and approval by a second certified applicator, 22 instances of no district supervisor sign-off, 6 instances of incomplete forms and 2 instances of out-of-date forms.

TA-2016-03 Written against the Eastern Upper Peninsula:

There were 2 instances of no variance for out-of-year-of-entry work, 5 instances of no pesticide application plan, 5 instances of no forest treatment completion report, 8 instances of no pesticide use evaluation report, 6 instances of no signatures associated on the forms, 2 instances where there was no review and approval by a second certified applicator, 14 instances of no district supervisor sign-off, 9 instances of incomplete forms and 2 instances where the dates on the forms were out-of-sequence.

TA-2016-04 Written against the Western Upper Peninsula:

There were 3 instances where there was no forest treatment proposal, 1 instance of no variance for out-of-year-of-entry work, 7 instances of no pesticide application plan, 7 instances of no forest treatment completion report, 9 instances of no pesticide use evaluation report, 9 instances of no signatures associated on the forms, 9 instances where there was no review and approval by a second certified applicator, 17 instances of no district supervisor sign-off, 10 instances of incomplete forms and four instances where the dates on the forms were out-of-sequence.