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

**Wisconsin County Forest Program  
Managed by Wisconsin DNR  
SCS-FM/COC-00083G**

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CERTIFIED	EXPIRATION
<b>12/31/2009</b>	<b>12/31/14</b>

DATE OF FIELD AUDIT
<b>08/10/10</b>
DATE OF LAST UPDATE
<b>10/25/10</b>

### Organization of the Report

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

## **FOREWARD**

The audit included a review of six Wisconsin Counties: Chippewa, Oconto, Florence, Forest, Ashland, and Iron. This report covers the 1st surveillance audit, following the 2009 recertification of the WI County Forest Program (WCFP). The 2010 audit was conducted pursuant to the FSC guidelines for annual audits as well as the terms of the forest management certificate awarded by Scientific Certification Systems in 2009 (SCS-FM/COC-083G). All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing compliance with the requirements and standards of certification. The full report of the initial evaluation is available on the SCS website. [http://www.scs-certified.com/forestry/forest\\_certclients.html](http://www.scs-certified.com/forestry/forest_certclients.html).

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

- A focused assessment of the status of any outstanding conditions or corrective action requests
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior audit
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

At the time of the August 2010 annual audit, there were six open Corrective Action Requests, the status of WI County Forest Program's response to these CARs was a major focus of the annual audit (see discussion, below for a listing of those CARs and their disposition as a result of this annual audit).

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## Section A – Public Summary

### 1.0 General Information

The counties enrolled in FSC certification at the time of the 20010 surveillance audit, and their acreages, are listed in table 1.

Table 1: FSC Certified Counties

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County	FSC acres
Ashland	40,083
Barron	16,025
Bayfield	169,444
Chippewa	33,653
Clark	132,852
Douglas	273,004
Eau Claire	52,350
Florence	36,710
Forest	11,107
Iron	174,267
Jackson	121,067
Juneau	15,380
Lincoln	100,845
Oconto	43,581
Price	92,197
Sawyer	115,201
Taylor	17,639
Washburn	149,024
Wood	37,533
County Forest Total Certified Acres	1,631,962

## **1.1 Annual Audit Team**

### **Dave Wager – Lead Auditor**

Mr. Wager is Director of Forest Management Certification for SCS. During his 9 years as Director, Mr. Wager has administered the program and led Forest Management and Chain-of-Custody evaluations throughout the world. Mr. Wager has led assessments of 30 forest management operations worldwide including Minnesota DNR, Pennsylvania State Forests, Massachusetts State Forests, Potlatch Corporation's Idaho Forestlands and Oregon Poplar Tree Farm, Wisconsin County Forests, Collins Pine Company, Department of Defense-Fort Lewis Installation, and operations in Brazil, Canada, Costa Rica, Japan, and Malaysia.

In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 85 active certificate holders covering 30 million acres. In other natural resources work, Mr. Wager played a key role in the development of Starbucks CAFE Practices- a program to ensure procurement of sustainably grown and processed coffee. Mr. Wager has expertise in business and forest ecology (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University) and utilizes both in his position with SCS. While studying forest ecology at Utah State University, Mr. Wager was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth in Utah's Central Wasatch Mountains.

### **Michael Ferrucci, Forester**

Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 18 years. Its clients include private citizens, land trusts, municipalities, corporations, private water companies, and non-profit organizations. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies.

Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies.

**JoAnn Hanowski, Biology/Ecology Specialist-**

JoAnn M. Hanowski was a senior research fellow at the University of Minnesota-Duluth’s Natural Resources Research Institute. She has considerable expertise evaluating the effects of forest management on wildlife habitat, and is currently working on research projects involving the response of birds to various forest management practices in stream and seasonal pond buffers and the development of indicators of forest and water health and sustainability in Minnesota and across the Great Lakes. She was a member of the forest bird technical team for the original GEIS and participated on the wildlife technical team that wrote forest management guidelines for Minnesota. She is a participant in a 14-year project for monitoring avian populations on the Chequamegon National Forest. She is currently a member of the riparian science technical committee that is investigating the effectiveness of Minnesota’s current guidelines for forest management in riparian systems. She has published 64 peer-reviewed journal articles and over 75 reports in her 21 year tenure with the University of Minnesota. In 2005 JoAnn participated in the largest forest certification project ever conducted in the United States, the joint FSC/SFI certification of Minnesota’s state lands. In 2006 and 2006 JoAnn contributed regional ecological expertise to the annual surveillance audits of the MN DNR’s FSC and SFI certificates.

**1.2 Total time spent on evaluation**

A. Number of days spent on-site assessing the applicant:	3
B. Number of auditors participating in on-site evaluation:	3
C. Additional days spent on stakeholder consultation:	-
<b>D. Total number of person days used in evaluation:</b>	<b>9</b>
<b>(Line D = (Total number of days in Line A x Total number of auditors from Line B) + additional days from Line C.</b>	

**1.3 Standards Employed**

<b>Box 1.3.1. – Applicable FSC-Accredited Standards</b>		
<b>Title</b>	<b>Version</b>	<b>Date of Finalization</b>
FSC Lake States Regional Standard	3.0	Dec 2006
FSC standard for group entities in forest management groups (FSC-STD-30-005)	V1-0	31 – August – 2009
All standards employed are available on the websites of FSC International ( <a href="http://www.fsc.org">www.fsc.org</a> ), the FSC-US ( <a href="http://www.fscus.org">www.fscus.org</a> ) or the SCS Forest Conservation Program homepage ( <a href="http://www.scs-certified.com/forestry">www.scs-certified.com/forestry</a> ). Standards are also available, upon request, from Scientific Certification Systems ( <a href="http://www.scs-certified.com">www.scs-certified.com</a> ).		

**2.0 Annual Audit Dates and Activities**

## 2.1 Annual Audit Itinerary and Activities

### Itinerary

#### Tuesday August 10

Evening opening meeting via conference call

#### Wednesday August 11

Oconto County ( 43,581 acres) – JoAnne Hanowski

Chippewa County (33,653 acres) –Dave Wager

#### Thursday August 12

Florence County ( 36,710 acres) – JoAnne Hanowski

Forest County (11,107 acres) – JoAnne Hanowski

Ashland County (40,083 acres) – Dave Wager

#### Friday August 13

Iron County (174,267 acres) – Dave Wager, Mike Ferrucci and JoAnne Hanowski

### Field Sites:

#### Wednesday August 11

Oconto County FSC audit Wed, Aug 11th, 2010

#### Opening meeting attendance

JoAnn Hanowski	FSC-SFI audit team
Ron Gropp	WI DNR Team Leader
Jim Warren	WI DNR Chief Public Lands and Conservation Services
Todd McCourt	WI DNR Liaison Forester Oconto County
Katherine Lenz	WI DNR Area Forestry Specialist
Dave Borisch	Oconto County Asst Adm
Bob Skalitzky	Oconto County Forest Adm
John Huff	WDNR-Wildlife

Stop 1: 125-07: One harvest unit with three harvest stands- red pine thinning, aspen clearcut, swamp hardwood clearcut. Examined stream crossing to aspen stand. Used culvert for crossing which was removed and approach reseeded. 50 ft no-cut buffer along stream. Good retention of white pine and oak in aspen clearcut.

Stop 2: 148-08: One harvest unit with two harvest stands-red pine thinning and jack pine regeneration. Third entry into red pine, thinned to 120. Small jack pine stand (<2 acres) cut to 6 ba. Little regen in jack pine, will reassess and likely hand plant jack pine.

Stop 3: 165-09: Red pine stand thinning at age 65 cut to 120ba. Getting good oak regen and goal is for oak. Have guidelines for tree marking in red pine stands for thinning.

Stop 4: 171-09: Scrub oak age 77 reduced to 50 ba harvested in 2001. 2007 regen survey indicates lots of oak regen. Talked about red-shouldered hawk, using key for identifying stick nests and developing mgmt plans for ets species.

Stop 5: 129-07: 2009 winter harvest in hemlock stand. Vernal pond had 30-40 ft uncut buffer. Little hemlock regen after first growing season. Deer, penn sedge (indicator of exotic earthworm presence) could be inhibiting hemlock regen. Northern hardwood thinning also sold with this sale. Second entry releasing oak with ¼ to ½ acre gaps. Goal is to convert to climax forest in an uneven-aged state.

Stop 6: 144-08: Hardwood thinning conducted on stand with a group marking experiment. Written guidelines provided for tree marking to the individuals that participated in the marking. Quite a bit of individual variation in residual ba (target was 90). Another vernal pond buffer.

Stop 7: Active sale 17-08: Aspen regen harvest that was active. 39 of about 80 acres will be harvested with this entry and the remaining acres will be harvested in the next 5 years. BA will be reduced to about 9%. Had conversation with certified logger on site.

Stop 8: 147-08: Red maple, aspen clearcut of about 19 acres with prescribed aspen enhancement. Cut 09 to about 5ba with good regen of both maple and aspen. Good white pine residual and ash island left due to wet soils.

Wednesday August 11  
Chippewa County – Dave Wager

Opening Meeting:

Mike Dahlby	Cty Forest Administrator
Jim Skorczewski DNR	Cty Forest Liaison
Drew Feldkirchner,	Forestry Liaison for Endangered Resources
Mike Rankin,	Forestry Technician

Tony Marinello	DNR Forest Ranger
Dan Masterpole	County Conservationist
Steve Edge	Forestry Team Leader
Jeff Barkley	DNR County Forest Specialist

Ice Age Trail: Backpack spray of garlic mustard along woods road in pine plantation.  
Camp Lake Game Trail (woods road) significant drainage problems on the road, largely due to large rain event early a.m. on day of audit. Silt barricades were holding back areas of sedimentation in most locations. There were some areas of sedimentation into kettles and ephemeral stream.

Tract- 06-10: 77-acre oak shelterwood. 56 sq ft of BA retained. Small wetlands/vernal pools flagged. Scarification for oak regeneration.

Tract 10-08: 42-acre (35-acre thinning and 7-acre clearcut) conversion of oak to northern hardwood. Retained 80 BA in thinning. Several NHI hits including red shouldered hawk. The forester did not observe hawks prior to the sale while informally looking for stick nests. There were no formal surveys completed prior to the sale. Good snag retention

Tract 9-08: 40-acre oak shelterwood, harvested Sept 2009; quality trees retained; small wetland kept out of sale;

Tract 02-09: 37-acre selection to remove high risk oak and favor with pine. Good white pine regeneration. Waterbars put in after sale by county. Major erosion problem on private access road, 2-3 foot gully and wetland sedimentation after big rain event. Road outside of the scope of the certificate, but still indicative of poor logger performance;

Deer Fly Road/Bass Lake: Grading of parking lot to correct erosion problems. Good signage to limit ATV, though one illegal ATV trail not signed/blocked

Deer Fly Swam- Newly established SNA, which has been appropriately labeled in WisFIRS

Thursday August 12  
Florence County 8/12/10

Opening meeting:

JoAnn Hanowski	FSC-SFI team auditor
Phil Theiler	WI-DNR Area Forest Supervisor
Jeremy Holtz	WDNR Wildlife Biologist
Jim Foley	ANAB Tech Expert
John Stratton	ANAB Auditor
Jake Walcisak	Florence County Forest Assistant Administrator
Stu Boren	WDNR Liason Forester/Team leader
Pat Smith	Florence County Forest Administrator
Andy Nault	Florence County
Jane Severt	WCFA
Jim Warren	WI DNR

Uplands 723-09f: Northern hardwood with 125 ba marked for target of 80ba. Talked about gap size-observe that smaller gaps are more successful in getting good regen throughout gap. Larger gaps tend to dry out and produce more raspberry. Suggested that climate change may have an impact. Used green paint for wildlife trees.

Dead Pecker: Aspen clearcut with white pine retention. Did some spruce/balsam salvage due to budworm damage. Left a 100ft buffer along stream and lowland swamp adjacent to buffer will be harvested in winter.

Blood Trail: Aspen clearcut with white pine and oak residuals. Removed some at risk white pine-site has pine tendencies. Inspected a wetland on the site-good bmp implementation with buffer, no operation or slash within wetland.

That Scrub Oak Sale: Clearcut with oak residual. Trees on site were dying due to insect and disease-many of the retention trees were also in decline. Getting red maple regen which is not desirable. Plan is to plant red and jack pine on the site after site prep. Not many options for the site.

Forest County (11,107 acres, SFI & FSC) – JoAnne Hanowski

Opening Meeting:

JoAnn Hanowski	FSC-SFI team auditor
Phil Theiler	WI-DNR Area Forest Supervisor
Jeremy Holtz	WDNR Wildlife Biologist
Jim Foley	ANAB Tech Expert
John Stratton	ANAB Auditor
Stu Boren	WDNR Team leader

Craig Williams	WDNR Liaison Forester
Jane Severt	WCFA
Jim Warren	WI DNR
Dan Peters	Natural Resources Tech
David Ziolkowski	County Forest Administrator

Uphill Sale: Northern Hardwood 110ba marked for harvest to 80-90ba. Active site with hand felling and skidding. Interviewed two loggers/no spill kit. Marked site with hardwood marking guidelines and left 350 gaps of about 1/10th acre each. Re-entry in 15 years to achieve northern hardwood maintenance objective. Cross country ski trail on site.

Lost Arrow: Northern hardwood with some aspen-about 20 acres. Marked and did not cut around two old logging sites. Good bmp implementation along intermittent stream-35ft buffer and no equipment within 15 ft-looked good.

Bur Oak: Aspen regeneration harvest from 07/08. Retention was done by prescription with good results- oak and white pine residuals. Snags lacking although prescription indicated that all dead standing trees should be left on site. Winter harvest due to intermittent high water levels on the site.

Ashland County 8/12/10- Dave Wager

Opening meeting:

Jeff Barkley	DNR County Forest Specialist
Darrel Zastrow	DNR Deputy Administrator - Div. of Forestry
Peter Anderson	DNR Forestry Tech
Joe Grapa	Ashland County Forester
Chris Hoffman	Ashland County Administrator
Matt Schultz	Ashland County Asst. Administrator
Tom Piikkila	DNR County Forest Liaison
Jay Gallagher	DNR Area Forestry Supervisor
Mark Diesen	Burnett County Asst. Administrator
Bruce Bacon	<del>W</del> DNR Wildlife Biologist
Al Tatzel	DNR Area Forestry Staff

Tract 1-09: Trot Road- Northern Hardwood/Hemlock stand. 49-acre even aged NH stand to convert to uneven aged. Winter only harvest. Successful examples of regenerating hemlock (difficult species to regenerate in Wisc). Road bermed. Good job excluding wetland/vernal pool areas from sale- one small wetland area that had one pass along edge. Balsam bough collection point, and discussion about socio-economic importance.

Red Pine Thinning "Tom's Pines": Excellent marking to improve pine plantation. No significant residual damage observed. Interview with logger, who demonstrated sufficient training and

knowledge. He expressed some concerns about opportunities for small operations (though no concerns were directed at Ashland County).

Tract 6-07 "Rubber Boot": 126-acre NH stand. Harvested 2007 with objective to convert to uneven or (all-aged) stand. Emphasis on low vigor, high risk, and poor quality. Gaps consistently put in. Good attention to green tree retention. Small area of rutting identified on sale, which was noted in inspection log. With no other problems noted on-site.

Tract 7-10: 57-acre NH even-aged conversion to uneven-age stand. Retained 4 hemlock inclusions, Good discussion of SGCN for Northern Mesic Forest Community. 17-acre red pine thinning. Excellent red pine site. Management will hold onto pine as long as feasible and slowly convert to NH type.

Tract 1-08: 51-acre aspen clearcut with green tree retention through designated conifer and RMZ. Harvested in 2008 before green tree retention guidelines were effective, but due to the RMZ likely met intent of retention guidelines. Good regeneration.

Tract 3-08: 28-acre aspen clearcut. Good regeneration. RMZ retention along Chippewa River.

Tract 11-07: 77-acre hardwood thinning; 34-acre aspen clear cut; Silver creek RMZ along sale. High quality site. Improvement cut in NH stand.

Tract 8-09: 164-acre aspen regeneration with retention of conifer, pockets of hardwood and wetland conifers. Under future GTR guidelines will be a need for leaving aspen patches similar to pre-harvest stand. Extensive hunter walking trails throughout sale. Hugely popular destination area for grouse hunters from all over the U.S.

Tract 14-09: 10 acre- Red Pine/Spruce thinning to remove budworm trees. 40-acre uncut aspen stand view from road.

Friday August 13

Iron County (174,267 acres, SFI & FSC) – Dave Wager, Mike Ferrucci and JoAnne Hanowski

Jeff Barkley,	Wisconsin DNR County Forest Specialist
Joe Vairus –	Iron County Forest Administrator
Neal Martinko,	Iron County Forester
C.E. Zinsmaster,	Iron County Forester
Gary Glonek,	Iron County Forester
Jane Severt,	Executive Director, Wisconsin County Forests Association
Joe Schmidt, Forester	Mercer, Wisconsin DNR
Angelo Aimone,	Iron County Forestry Scaler
James Gallagher	DNR Area Forestry Supervisor
Tyler M.	Iron County Forester
Jim Warren	DNR Chief Public Lands and Conservation
Henry Schienebeck	Great Lakes Timber Professionals
Heather Berklund	DNR Forester
Colleen Matula	DNR Forest Ecologist
Bruce Bacon	DNR Wildlife Biologist
Carmen Wagner	DNR Forest Hydrologist
Al Tatzel	DNR Forestry Specialist

#### Ferrucci Sites

Tract # 28-09 Section 5, T43N, R3E Town of Mercer, along Moose Lake Road: Partially completed, wettest portion not attempted; prepared October 2009; Aspen stand 52 acres clearcut, White spruce plantation 34 acres thinned. Harvested during April-August 2010, during the June-August period the area has had unusually high rain levels; contract clause 9 “Suspension of Logging Operations” gives Iron County the right to temporarily suspend logging operations due to site damage during extreme wet periods. Several small wetlands were crossed even though alternate routes were available to completely avoid or to minimize impacts to wetlands soils on some of them. The impacts included rutting (near steep section of main skid trail) and placing modest amounts of slash into the wetlands. Also noted rutting on steep portion of the main skid trail in one location and in wetlands adjacent to that location, with no water bars, including unnecessary rutting caused by the forwarder traveling into the wetland unnecessarily (the processor did not enter this area; there is access to the trees that were removed directly from an upland main skid road).

Tract # 27-09 Section 6, T43N, R3E Town of Mercer, along Moose Lake Road: Active harvest, interviewed loggers including Scott DeRosso, Harvester Operator, and Don Steven, Forwarder Operator (both trained under the Michigan SFE program). Aspen stand and, White spruce plantation clearcut, total 98 acres, many pocket wetlands and forest openings break the area into smaller sections. Leaving unmerchantable trees and hardwood trees over 20 inches. Concern that this prescription will not meet the green tree retention provisions, forester modified instructions to loggers to leave some of the large Aspen also.

Tract # 18-04 Otter Slide Sale, S. Island Lake Road portion: Completed harvest in 2009 set up 2004, Northern hardwood primary type, red maple secondary. Reviewed regeneration in gaps; found significant number of seedlings mostly less than 3 feet tall, mostly sugar maple, with small yellow birch, a few cherry, others.

#### Wager Sites

Tract # 18-07: 62-acre NH thinning. Harvest focused on removal of poor quality, high risk trees, and regeneration in gaps. Good CWD, No BMP issues- cut winter 2009; good diversity and quality of trees retained; gaps of varying sizes consistently marked, cut, and mapped. Effective use of NH Management Evaluation Sheet.

Tract #18-09: 339-acre mostly NH with some swamp and bottomland hardwood. Objective enhance hardwood component by removing aspen, balsam, birch, and poor quality/high risk hardwoods. Effective implementation of silvicultural prescription. Timber Sale Notice specified winter or very dry conditions for logging. However, the sale was actively being cut during a very wet period in August. Excessive rutting was observed through a long section of one ravine. Subsequently logging contractor had moved himself to drier part of the sale where no rutting was observed.

Potato River Falls Park/Campsite: Iron County maintained campground along scenic Potato River. Good example of recreation opportunities provided by County Forests.

#### Hanowski Sites

Marten Sale: Marked hardwood with input from biologist for consideration of marten management. Current stand is mixed hemlock, maple, yellow birch about 110 ba. Plan is to harvest to 85ba. Marked buffer around vernal pond and green painted wildlife leave trees. Goal is to increase site quality and tree species diversity.

Tract 24-09: Marked northern hardwood and cedar stands. Wildlife biologist consulted due to martens in area-martens like conifer, larger coarse woody debris. Have marked some ¼ acre gaps. Some cedar regen on site.

Weber Lake Park: A new rv park, picnic area and boat launch on Weber lake. Honor system fees- nice area.

Uller X-C trail and North Country Trail within HCVF. The HCVF is about 1700 acres and the trail goes through the HCVF that is passively managed. Nice hardwoods. County maintains the ski trails.

### **3.0 Changes in Management Practices**

There were no changes in management practices since the 2009 recertification audit. No change in lands included or excluded within the scope of the certificate.

Changes to programs since the 2009 surveillance audit:

- New BMP’s for ponds, wetlands will go into effect in January of 2011.
- The Department was reorganized and was reduced from 4 to 3 Bureaus. The Forest Science group was combined with another Bureau.
- Knowles-Nelson Stewardship program was reauthorized. Counties can now participate in the land acquisition side of Stewardship with DNR -but must cost-share 50%.

Changes in personnel from last year:

- 1) Personnel changes: Paul Pingrey retired, position has not yet been filled—it is considered to be a “priority position. In general, unfilled positions increased to 12% (from 3% in 2009) across the DNR, and staff are required to take 8 furloughs days/year.
- 2) County Forest Time Standards are now looked at as a maximum instead of the minimum. In previous years the time standards have typically been exceeded, but in ~~2009~~ 2010 and in the future the standards will, at best, only be met. As a result County Forests are receiving less assistance from the DNR.

#### 4.0 Annual Summary of pesticide and other chemical use

The DNR has prepared and follows guidance on complying with the FSC policy regarding highly hazardous pesticides. The following chart shows the chemical pesticides used on the County Forests.

**Pesticides Used on Wisconsin County Forest Lands (2009-2010)**

Chemical Name	Active ingredients	Permitted by FSC
Accord	Glyphosate	Yes
Accord XRT II	Glyphosate, isopropylamine salt	Yes
Amine 4 2,4-D weed killer	2-4-d, dimethylamine ester	Yes
Arsenal AC	imazapyr, isopropylamine salt	Yes

Buccaneer Plus	Glyphosate	Yes
Chopper 2 herbicide	Imazapyr, isopropylamine salt	Yes
Cornerstone Plus	Glyphosate	Yes
Element 4	triclopyr	Yes
Garlon 4	triclopyr	Yes
Garlon XRT	Triclopyr, butoxyethyl ester	Yes
Killz All	Glyphosate	Yes
Milestone	aminopyralid	Yes
Oust Extra	Sulforeturon methyl, metsulfuron-methyl	Yes
Oust XP	Sulforeturon methyl	Yes
Pathway		Yes
Plateau	imazapic	Yes
Quik Pro	Glyphosate	Yes
Raid Wasp Killer	Imidcloprid	Yes
Rodeo	Glyphosate	Yes
Roundup	Glyphosate	Yes
Roundup Ultra Max	Glyphosate	Yes
Spike 80DF	Tebuthiuron	Yes
Stalker	Imazapyr, isopropylamine salt	Yes
Tordon K	Picloram, potassium salt	Yes
Transline	Clopyralid	Yes

## 5.0 Open Corrective Action Requests (CARs)

**Non-Conformance:** Insufficient conformance with Indicator 6.2.b. *If scientific data indicate the likely presence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive populations, either new surveys are carried out before field-management activities begin or the forest*

*owner or manager assumes their presence and makes appropriate modifications in forest management.*

The Wildlife Action Plan (WAP) does not yet provide silvicultural/management recommendations for species of greatest conservation need (SGCN). Awareness of WAP and Conservation Opportunity Areas (COA's) among County Forest staff was variable. As such Minor CAR 2009.1 is issued to ensure continued progress.

Despite the proper utilization of NHI- there is still insufficient use of other methods to ensure species of special concern are not being impacted. Many of the County Forests have not undergone a comprehensive biotic inventory- suggesting that NHI may be insufficient. The WAP has identified COA's on County Forests for possible occurrences of GCN species. Other than the barrens communities, County Forests have not made consistent efforts to modify forest management in these areas. There is a need for DNR to develop management guidelines for SGCN species.

<b>CAR 2009.1</b>	WCFP (with DNR taking the lead) must provide participating FSC counties with relevant information on SGCN species for each County along with management guidelines for focalspecies.
<b>Deadline</b>	2010 Surveillance Audit
<b>Reference</b>	<i>FSC Indicators 6.2.b; 5.1.c</i>

**Action Taken By Certificate holder/Auditor Comments:**

**Supporting documents to address FSC CAR 2009.1**

- Jeff Barkley e-mail – Wildlife Action Plan guidance to Counties
- Species List – Guidance document status 7/10
- 2011-2013 Species Guidance budget issue brief
- Northern Cricket Frog species guidance (On-line at: <http://dnr.wi.gov/org/land/er/wwap/explore/profiles.>)
- Washburn Cty. SGCN considerations (Draft)
- Marathon Cty.(SFI) SGCN considerations
- Draft Manual Code – Procedure for the Development & Approval of Rare Species and Natural Community Guidelines
- Tree Retention Area-wide training agenda – Peshtigo & Ladysmith (shows incorporation of WAP training)
- Agenda: Lake Superior Area inservice 12/8/09
- Drew Feldkirchner e-mail – Species guidance update 7/21/10
- Workload Schedule – Northern Mesic Forest conservation actions
- Timber Sale Narrative (Form 2460-001A Rev. 1-10)

Corrective Action

- Submit budget issue brief for development of species guidance documents
- Contract for / complete development of species guidance for high profile list of species. Species

guidance will provide life history, identification and locational information that will aid in avoiding take and providing avoidance measures.

- Post guidance documents on DNR Internet page as they are completed and communicate to counties / DNR foresters
- Continue to communicate availability of existing information on ER website <http://dnr.wi.gov/org/land/er/wwap/explore/property.asp?mode=countylist> , highlighting the General Management Opportunities for each natural community
- Initiate and further discussions with Regional Ecologists and local Wildlife Biologists on SGCN and General Management Opportunities within county forests
- Further develop Conservation Actions at the Natural Community level

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#### Progress / Completion

- Submitted 2011-13 budget issue brief. *\*It was unsuccessful and did not get forwarded on for consideration.*
- Guidance documents were initiated on 24 species
- Northern Cricket Frog guidance was completed and posted on the DNR internet at : <http://dnr.wi.gov/org/land/er/wwap/explore/profiles>
- Local discussions were had with Wildlife Biologists in several counties, both on some general considerations and how best to document on the Timber Sale Notice & Cutting report
- NOR Region – WAP presentation to Lake Superior Basin 12/8/09
- WAP information incorporated into many of the Tree Retention area-wide training – Ladysmith (3/18/10), Woodruff (3/15/10), Peshtigo (6/7/10)
- Incorporate Wildlife Action Plan into Revision of Timber Sale Narrative (2460-001A)
- Draft manual code language was developed for Development & Approval of Rare Species and Natural Community Guidelines
- Several phone conversations between Regional ecologists and foresters
- Conversations were initiated with Regional Ecologists on the development of Natural Community Guidance language
- 7/23/10 conference call with Regional ecologists and Central office ER staff

#### SCS 2010 Response:

SCS verified that the above actions occurred. Interviews with DNR and County staff demonstrated that the understanding and incorporation of WAP/SGCN information has improved considerably. Plan for developing additional and more specific guidelines is acceptable, and will continue to be monitored in future audits.

**Status: Closed**

**Non-Conformance:** 6.3.c.3. Forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools), and forested riparian areas (see also Criterion 6.5). While most Counties are exceeding their own BMP requirements (which don't require vernal pool and pocket wetland protection) by protecting these vernal pools and small wetlands, there is no required systematic protection for these aquatic resources across the County forests.

In Chippewa County we observed a vernal pool that had been crossed with the skidder and had tops in it. Also observed no retention on one pocket wetland.

<b>CAR 2009.3</b>	Ensure forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools).
<b>Deadline</b>	2010 audit
<b>Reference</b>	<i>FSC Indicator 6.3.c.3.</i>

**Action Taken By Certificate holder/Auditor Comments:**

**Supporting documents to address FSC CAR 2009.3**

- Expert Review Summary – Wisconsin BMPs 6/09
- Forestry BMP Advisory Committee – Initial direction to field manual subcommittee 7/3/09
- Chapters 2 & 7 updates 9/09 DRAFT
- Ephemeral Ponds – Mapping, Inventory & Classification Project (NE Area State & Pvt. Forestry grant application) 10/16/09
- Updating the Forestry BMPs for Water Quality Field Manual, Training & Monitoring Program (NE Area State & Pvt. Forestry grant application ) 10/16/09
- Ephemeral Ponds – Mapping, Inventory & Classification Project (GLRI – Great Lakes Restoration Initiative) pre-proposal grant application 11/23/09
- Updating the Forestry BMPs for Water Quality Field Manual, Training & Monitoring Program. (GLRI – Great lakes Restoration Initiative pre-proposal grant application 11/23/09)
- Summary of updates to Forestry BMPs for Water Quality 12/11/09
- Forestry BMPs for Water Quality 3/10 Draft
- Forest Service Grant Award Notification Letter for Updating Forestry BMPs (3/8/10)
- Forest Service Grant Award Notification Letter for Ephemeral Ponds Project (3/12/10)
- Wisconsin Council on Forestry Notes, including update on Forestry BMPs (3/18/10)
- Forestry BMPs for Water Quality Final Summary 5/10/10

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Corrective Action

- Work through BMP Advisory Council and partners to revise BMPs for Water Quality, including expanding upon recommendations for management adjacent to wetlands / ephemeral ponds
- Seek funding for further research into ephemeral ponds
- Seek funding to assist in the updating of the Forestry BMPs for Water Quality Field Manual

- Communicate changes to field forestry staff on County Forests and State lands

#### Progress / Completion

- Expert Review panel provides summary of current / existing BMPs (6/3/09)
- BMP Advisory Committee provides initial direction to BMP Field Manual subcommittee (7/3/09).  
*\*Jane Severt – WCFA Exec. Director serves on the BMP Advisory Committee and Russ Asuzmann from Taylor County Forestry Dept. was a member of the BMP Field Manual subcommittee. Tom Lovlien – Marathon County Forest Administrator is participating on the BMP Monitoring Team for 2010.*
- BMP Field Manual Draft updates formulated and reviewed (7/09 – 9/09)
- Submitted grant application to Northeastern Area State and Private Forestry for Ephemeral Ponds – Mapping, Inventory and Classification Project (10/16/09)
- Submitted grant application to Northeastern Area State and Private Forestry for Updating the Forestry BMPs for Water Quality Field Manual, Training, and Monitoring Program. (10/16/2009)
- Submitted pre-proposal grant applications to Great Lakes Restoration Initiative (GLRI) for: 1) Updating the Forestry BMPs for Water Quality Field Manual, Training Program, and Monitoring Program and 2) Ephemeral Ponds – Mapping, Inventory and Classification Project (11/23/09)
- Public comments submitted on revised Forestry BMPs (12/09 – 2/10)
- BMP Advisory Committee approves Final Draft of revised Forestry BMPs Manual (2/10)
- Brief Summary of updates to BMPs given at WCFA Spring Meeting (3/25/10)
- FISTA BMP training for loggers and foresters started for season. Training includes updates to BMPs effective 1/1/11. 6 sessions scheduled for 2010 (5/10 – 11/10)
- Text and graphics provided to graphic artist for BMP Field Manual (7/10)
- Final proof expected for BMP Field Manual (9/10)
- Printed copy of BMP Field Manual expected to be available (11/10)
- Presentation at WCFA Fall Meeting on Updates to BMPs (11/5/10)
- Revised BMPs take effect Jan. 1, 2011

#### SCS 2010 Response:

SCS verified that the above actions occurred. During the 2010 audit we observed numerous examples of adequate wetland/vernal pool protection. The new BMP's will further improve wetland/vernal pool protection. In addition DNR is undertaking important research that will provide additional information as to how to best protect vernal pools.

**Status: Closed**

**Non-Conformance:** 6.5.b. At a minimum, implementation of BMPs and other resource protection measures will result in the following:

(italics are relevant clauses from Indicator 6.5.b.)

- *Logging operations and construction of roads and skid trails are conducted only during periods of weather when soil is least susceptible to compaction, surface erosion, or sediment transport into streams and other bodies of water.*  
-Jackson County- Sales 2114 and 1994. Both sales were required winter harvest only, but were cut in September with County approval. Observed two areas of 2114 with excessive rutting. There was no note of the rutting in timber sale inspection or sale close-out.
- *The transportation system is designed, constructed, maintained, and/or reconstructed to minimize the extent of the road network and its potential cumulative adverse effects.*
- *Access to temporary and permanent roads is controlled to minimize significant adverse impacts to soil and biota while allowing legitimate access, as addressed by Principles 3 and 4 and identified in the management plan.*
  - Clark County maverick ATV trails are having cumulative impacts as trails creep into forest. Restoration is necessary.
  - Clark County Wildcat Road is a County Forest road where ATV traffic results in excessive berms and unsafe travel.
  - Chippewa Forest County Road- ATV and other traffic was causing the road to unravel and some sedimentation into adjacent water was observed.
- *Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.*
  - - Chippewa Forest County Road and boat landings. Chippewa Forest County Road- ATV and other traffic was causing the road to unravel and some sedimentation into adjacent water was observed.

<b>CAR 2009.4</b>	Applicable WCFP Counties must take action to correct BMP violations noted in the non-conformance section above (where mitigation is appropriate- i.e., repairing ruts is often not pragmatic) and take measures to improve monitoring of road and harvest conditions to avoid future occurrences and/or more timely correction/mitigation of problems.
<b>Deadline</b>	2010 audit
<b>Reference</b>	<i>FSC Indicators 6.5.b</i>

**Action Taken By Certificate holder/Auditor Comments:**

**Supporting documents to address FSC CAR 2009.4**

Progress / Completion

- WCFA Certification committee appoints administrators from Lincoln, Langlade, Marathon, and Wood counties to work on policy and inspection form 9-09
- Clark County receives Forestry Committee approval to establish a Reserved / Undesignated Forest Road Fund to be funded through 5% of county forest timber revenues to focus on needs for road infrastructure rehabilitation 12/09 (expenditure and final approval dependent on 2011 budget)

process)

- Clark County completes repairs on maverick ATV use site visited during 2009 audit
- Chippewa county completes repairs to problem areas identified in 2009 audit including: Hickory Ridge trail, Bass Lake #3 parking lot, and Bass Lake #2 boat ramp.
- WCFA working proactively to increase funding for ATV maintenance on forest roads and summer routes
- Road maintenance policy and sample Road Inspection checklist distributed to all counties 4/10
- Identified increasing maintenance funding on county forest roads as a legislative initiative for FY11 at 6-16-10 WCFA mtg.

**SCS 2010 Response:**

SCS verified that the above actions occurred. New policy and inspection forms have been developed. Developments at Clark County to retain a percentage of timber revenue for road infrastructure/rehabilitation are very positive. Photo's reviewed (Clark County) and actual restoration sites viewed in Chippewa County are sufficient to address the non-conformances that triggered this CAR.

**Status: Closed**

**Non Conformance:**

Summary of monitoring results is not easily accessible- 8.5.b. *Managers of public forests make information related to monitoring easily accessible (e.g., available on websites) for public review.* A list of monitoring activities has been summarized and provided to the certification team. The public can obtain some monitoring results from annual reports from County websites. However, a complete summary of results has not been produced or made easily accessible.

<b>CAR 2009.5</b>	Counties and or DNR must make available a public summary of monitoring results that covers the topics listed in Criterion 8.2 readily available.
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<b>Deadline</b>	2010 annual audit
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<b>Reference</b>	<i>FSC Indicator 8.5. b</i>
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**Action Taken By Certificate holder/Auditor Comments:**

- Most, but not all counties have posted their 15 yr. plans and Annual Work Plans to their County websites. (\*All have those documents publicly available at their offices if requested however)
- Revision to DNR County Forest internet page completed 7/10

**SCS 2010 Response:**

As a result of WCFP efforts to address this CAR, the public now has access to monitoring information through several avenues. All Counties will make available annual work plans and 15 year plans (that contain some monitoring results) available to the public, and most of the Counties have this information posted on their websites. A new County Forest page for monitoring information is located at <http://dnr.wi.gov/forestry/county/>.

Finally, the WI DNR website have a large amount of monitoring information that would be applicable to County forests, e.g., <http://dnr.wi.gov/org/land/wildlife/>; <http://dnr.wi.gov/org/land/er/WWAP/>; and other pages.

**Status: Closed**

**Non Conformance:**

*9.3.a. Forest management plans and activities are appropriate for maintaining, enhancing and/or restoring attributes that make the area an HCVF.*

HCVF- that is to be maintained with passive management is not consistently being removed from the harvest schedule (i.e. zzzz out of WisFIRS). Thus, operational protection is dependent upon institutional memory. Some counties have considerable turnover- thus making this a tenuous situation.

<b>CAR 2009.6</b>	County Forests must develop improved methods of ensuring that HCVF is not inadvertently harvested due to a WisFIRS harvest trigger.
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<b>Deadline</b>	2010 annual audit
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<b>Reference</b>	<i>FSC Indicator 9.3.a,</i>
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**Action Taken By Certificate holder/Auditor Comments:**

Corrective Action

- Document compartment and stand numbers that encompass all HCVF (FSC) and Exceptional Resource areas (SFI) on County Forests
- Determine HCVF & Exceptional Resource areas that are passively-managed per 15 year plan
- Verify that "Z" prefixes are added to those stands that are to be passively managed, removing them from the harvest schedule

**SCS 2010 Response:**

SCS viewed spreadsheet – HCVF WisFIRS coding – County Forests to confirm that HCVF sites for passive

management are properly coded.

**Status: Closed**

**Non Conformance:** There are non-conformances with FSC Group Criteria:

*1.c. The group entity shall be contractually responsible to the certification body for ensuring that the FSC P&C are fully implemented by all members of the group.*

*and*

*1.d The group entity shall be responsible for ensuring that any conditions on which certification is dependent, and any corrective actions issued by the certification body thereafter, are fully implemented.*

During the 2009 audit team concluded that the Group Manager (WI DNR) has missed identifying some significant non-conformances with FSC standards and open or past CARs at Chippewa County.

FSC STD-30-005 (which goes into effect Jan 1, 2010) will have new requirements for group member monitoring)

*7.1 The group entity shall implement a documented monitoring and control system that includes at least the following: ii.Regular (at least annual) monitoring visits to a sample of group members to confirm continued compliance with **all the requirements of the applicable Forest Stewardship Standard**, and with any additional requirements for membership of the group.*

DNR's current internal monitoring is only reviewing open CARs and does not include a field component. Given the non-conformance with existing group standards, and very likely non-conformance with the pending changes to group certification requirements described in 30-005, improvements to the internal control of the group program are necessary.

**CAR 2009.7**

WCFP must develop new or improve/expand on existing internal control mechanisms to ensure that all group members are conforming to the FSC standards.

**Deadline**

2010 annual audit

**Reference**

*FSC Group Criteria C1-1c,1d*

**Action Taken By Certificate holder:**

- Distributed annual updates to CARS and recommendations to all counties
- Distributed internal memo to DNR staff re: the need to improve documentation of certification in both Partnership meeting minutes and County Forest 3 yr. program audits.
- County Forest Specialist more closely scrutinizing certification sections of minutes and program audits.
- Minutes of WCFA Certification committee meetings since last audit (9/21/09, 11/5/09, 1/27/10, 3/24/10, 6/16/10, and 7/14/10) distributed to all County Forest Administrators and DNR Liaisons / Team Leaders / Area /Regional staff *\*Note: the minutes have discussion that relates to progress on all of the CARS to some degree*

**SCS 2010 Response:**

The incremental changes that were made to improve internal control mechanisms are sufficient to close this CAR. For the 2010 audit, the WCFP was assessed against a new FSC group forest management standard STD-30-010 and a new gap was identified- see CAR 2010.2

**Status: Closed**

**Non Conformance:** 1.6.b Forest owners or managers document the reasons for seeking partial certification. Some Counties, e.g., Juneau, actively manage forests that are not included in the County Forest Program, and thus not all managed forests within a County are enrolled in FSC. Counties have not been documented reasons for their seeking partial certification.

<b>CAR 2009.8</b>	All FSC certified County Forests with at least 2500 acres of non-certified managed forest must document reasons for seeking partial certification.
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<b>Deadline</b>	2010 annual audit
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<b>Reference</b>	<i>FSC Indicator 1.6.b</i>
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**Action Taken By Certificate holder:**

- Compiled all straight county lands in 18 FSC counties
- Main reasons for not certifying these lands (and not entering them into CFL) are:
  1. Use is inconsistent with purposes of County Forest Law – not suitable for timber production, public recreation or compatible uses. Some are very small parcels and others may have structures on them.
  2. Location is out of the Forest blocking making it administratively difficult to manage. Many counties that acquire such parcels (often through tax delinquency) use them as potential trade lands

<p>in order to acquire parcels within blocking</p> <p>3. The vast majority of these acres are not “managed forests”.</p> <p><b>SCS 2010 Response:</b></p> <p>WCFP provided an adequate justification for not including all of the forest owned by each of the eighteen FSC Counties. SCS does not find any violations of the Partial Certification Policy.</p>
<p><b>Status: Closed</b></p>

**Observations:**

<b>OBS 2008.1</b>	WI. County Forest program, in cooperation with WDNR, should take additional measures to reduce the deer populations to levels where ecosystem health is not compromised.
<b>Response</b>	WI. Response: WCFA has been one of the most active groups statewide for engaging in deer management and the setting of harvest quotas. Past history has reflected that as identified in previous audits. This past year WCFA Executive Director testified at the 12/17/09 Senate Hearing on the deer season review. WCFA has been an ally to the Dept. of Natural Resources. WCFA currently has a representative (D. Bowe) on the Deer Management Unit (DMU) Stakeholder Review Panel, actively involved in the process. A County Forest Administrator (M.Peterson) also served on the Natural Resources Bd. subcommittee tasked with development of an alternative to Earn-A-Buck. In addition, WCFA participates on the Deer Coalition. In 8/2009 Bayfield County Forest hosted a stop on a field tour for the Natural Resources Board, showing the deer herbivory problem on a fenced oak regeneration site. At its June 2010 meeting WCFA approved a \$250 expenditure to aid deer research efforts.
<b>Status</b>	Closed: WCFP has clearly taken sufficient action to address the Observation.

<b>OBS 2009.1</b>	Clark County (and to a lesser degree Eau Claire) have implemented Ecological Management Unit planning with long-term desired future conditions within a landscape planning context. Other County Forests have not implemented this approach. County Forests that are conducive to landscape scale planning (e.g., larger counties with variability in timber types) should adopt an EMU approach or a something similar to better accomplish landscape-level planning.
<b>Response</b>	Planning by ecological landscape fits some counties quite well in that there are

	markedly different goals for certain parts of their forest. Some counties, including most of the small ones, lack that variability and breaking up by ecological management units is of little value.
<b>Status</b>	Closed. Given that this is not an explicit requirement in the standard, the actions taken to-date are sufficient.

<b>OBS 2009.2</b>	At least one county was not coding regeneration sites to ensure follow-up monitoring of natural regeneration- where successful regeneration was uncertain.
<b>Response</b>	Where regeneration is in doubt or where targets for species specific regeneration is desired, the WisFIRS database provides opportunities for coding revisits to stands to verify regeneration. Many counties continue to use the old system of monitoring as directed in the Public Forest Lands Hbk. (p. 300-12). Regeneration stemming from selection silviculture and most even-aged harvests has historically been easy to attain and not worth staff time to confirm. When regeneration is questionable or circumstances indicate that response may be outside the norm for that timber / harvest type, follow up visits are made.
<b>Status</b>	<b>Continued-</b> We did not encounter any questionable regeneration sites during this audit, and thus did not assess how consistent the follow-up is on questionable regeneration sites.

<b>OBS 2009.3</b>	Most stands managed under selection methods are currently even-aged and are being gradually converted to uneven-aged structure. Most current selection-system harvest entries are not being designed to aggressively seek regeneration, and gaps have been smaller and less frequent than recommended in the Silviculture Handbook. Harvests that do include “gaps” to release existing regeneration or to encourage additional regeneration are often easy to assess for regeneration status; but systems to document the regeneration are more informal and less timely (RECON done some years later) than they could be.
<b>Response</b>	As referenced above, where regeneration is questionable or there are species specific targets for regeneration, followup visits are made. Gap creation in Northern Hardwood management is evolving as Foresters get accustomed to applying them, learn best how to implement them on a sale, and determine the most effective size to achieve the desired objective
<b>Status</b>	<b>Continued-</b> We observed gaps being put into NH intermediate treatments on a

	systematic basis. However, there is still room for improvement in assessing regeneration status, e.g., what species are regenerating in gaps.
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<b>OBS 2009.4</b>	While amounts of harvesting of sphagnum moss are small relative to the overall inventory of it on County Forests- the rates of its growth are extremely slow. County Forests harvesting sphagnum moss should carefully review the overall sustainability of this harvesting activity.
<b>Response</b>	Jackson County is the only County Forest currently harvesting moss. This practice has been carried on for many years, to a minor extent. About 20,000 acres of non-forest spruce / tamarack bog wetlands are present on the JCF. Approximately 2000 of these (10%) are managed as commercial moss marshes. Mossing generates little revenue but provides work for a small subset of the local work force that have historically harvested moss. Mossing represents an effort by the County to provide for non-traditional uses of the forest by local work force. Based on past practice it takes 7 to 10 years for a moss to regenerate. In 2008 as part of a larger project, a Peatlands project in Wisconsin produced a status assessment of plants (baseline data). There have been no further studies in Wisconsin to my knowledge.
<b>Status</b>	<b>Continued:</b> SCS will need to see a more detailed sustainability analysis and/or visit mossing operations in Jackson County before this Observation can be closed.

## 6.0 New Corrective Action Requests (CARs)

<p><b>Non Conformance:</b> According to Indicator 6.5.b. <i>At a minimum, implementation of BMPs and other resource protection measures will result in the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Roads without a weather resistant surface (e.g., soil, dirt, or native-surfaced roads) are used only during periods of weather when conditions are favorable to minimize road damage, surface erosion, and sediment transport.</i></li> <li>• <i>Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.</i></li> </ul> <p>Additionally, according to 5.3.c. Harvest practices minimize residual stand damage. <i>For example: Soil compaction, rutting, and erosion are minimized.</i></p> <p>During the 2010 audit we observed BMP non-conformances with one or more of the above requirements of Indicator 6.5.b. and 5.3.c at Chippewa and Iron Counties.</p> <ul style="list-style-type: none"> <li>- Chippewa Forest- Camp Lake road was unraveling in places and some sedimentation into</li> </ul>
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<p>adjacent water was observed.</p> <ul style="list-style-type: none"> <li>- Iron County Tract # 28-09 located in Section 5, T43N, R3E (Town of Mercer) along Moose Lake Road did not have harvest system layout that minimized impacts to wet soils or to small wetland pockets. Additionally Tract 18-09 had a clause in the contract that harvest operations would only occur on dry or frozen conditions. The site was visited during a very wet period in August, was actively being logged, and had an area of significant rutting.</li> </ul>	
<b>CAR 2010.1</b>	Applicable WCFP Counties must take action to correct BMP violations noted in the non-conformance section above (where mitigation is appropriate- i.e., repairing ruts is often not pragmatic).
<b>Deadline</b>	2011 annual audit
<b>Reference</b>	<i>FSC Indicator 6.5.b</i>

<p><b>Non Conformance:</b> WCFP does not annually monitor a sample of group members to confirm continued conformance with all the requirements of the applicable FSC Standard in accordance with FSC-STD-30-005- Criterion 8.1.</p> <p><i>The Group entity shall implement a documented monitoring and control system that includes at least the following: ii. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with any additional requirements for membership of the Group.</i></p>	
<b>CAR 2010.2</b>	WCFP must develop and implement a documented procedure to ensure internal monitoring of group members covers all the requirements of the applicable FSC Standard.
<b>Deadline</b>	2011 annual audit
<b>Reference</b>	<i>FSC-STD-30-005; Criterion 8.1</i>

### 6.1 Observations (OBS)

<p><b>Background/ justification:</b> Ashland County is actively managing some of its hemlock HCVF areas. Informal observations suggest that the silvicultural activities are successfully regenerating hemlock and thus consistent with the requirement to maintain/perpetuate HCVF. However, timber harvests in these HCVF areas are occurring without a specific plan based on and linked to monitoring data (e.g. releve plots).</p>	
<b>OBS 2010.1</b>	For areas where HCVF is being actively managed, timber sale 2460 forms should include an explicit discussion of how HCVF has been addressed.

	Additionally, WCFP should ensure that there is a mechanism to link monitoring results of HCVF to management decisions.
<b>Reference</b>	<i>FSC Indicator 9.3.a.</i>

**7.0 Stakeholder Comment\***

Wisconsin County Forest Program has not reported to SCS that it has received any stakeholder complaints or disputes since the 2009 re-certification, and stakeholder outreach by the audit team has not revealed any stakeholder complaints or disputes.

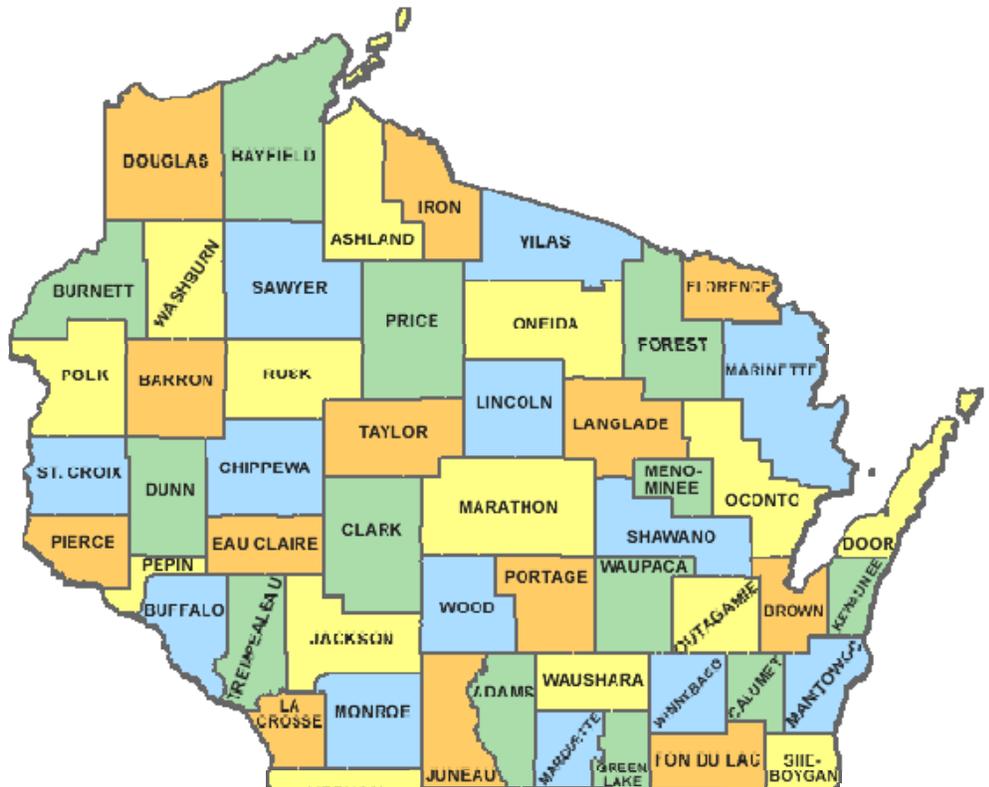
<b>Box 7.1 – Summary of Stakeholder Comments and Responses from the Team Where Applicable</b>	
SCS did not receive any comments from interested parties as a result of stakeholder outreach activities during this annual audit.	<input checked="" type="checkbox"/>

**8.0 Certification Decision**

<b>Box 8.1 Surveillance Decision</b>	
The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME’s response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

**9.0 Current list of Non-SLIMF FMUs (multiple FMU and group certificates only)**

County	FSC acres
Ashland	40,083
Barron	16,025
Bayfield	169,444
Chippewa	33,653
Clark	132,852
Douglas	273,004
Eau Claire	52,350
Florence	36,710



Forest	11,107
Iron	174,267
Jackson	121,067
Juneau	15,380
Lincoln	100,845
Oconto	43,581
Price	92,197
Sawyer	115,201
Taylor	17,639
Washburn	149,024
Wood	37,533
County Forest Total Certified Acres	1,631,962

## Section B - Appendices

### Appendix 1 – List of FMUs selected for evaluation (CONFIDENTIAL)

<input type="checkbox"/> FME consists of a single FMU – <i>No further action required</i>
<input checked="" type="checkbox"/> FME consists of multiple FMUs – <i>See table below, which applies to multiple FMU and group evaluations, but is inapplicable if the scope of the evaluation is a single FMU.</i>

### Selection of FMUs for evaluation

During the 2010 audit we selected five FSC counties concentrated in the Northeastern part of the State. Additionally- we revisited Chippewa County due to non-conformances from the 2009 audit.

### Appendix 2 – Evaluation of Management Systems (CONFIDENTIAL)\*

For each County visited we met in the office to discuss changes, CAR responses, and inspect records. Prior to the audit, timber sales were semi-randomly selected for site visit. In addition, we also visited active sales for each of the counties that had operations going on the day of the audit.

### Appendix 3 – Stakeholder analysis (CONFIDENTIAL)\*

<b>Box 3.2.1 – Summary of Stakeholder Comments and Responses from the Team Where Applicable</b>	
FME has not received any stakeholder complaints and the annual audit uncovered no known disputes since the previous evaluation. SCS has not received any complaints from stakeholders regarding its performance or treatment of FME's management system.	☒

**Appendix 4 – Additional Audit Techniques Employed (CONFIDENTIAL)\***

The audit team did not employ any additional audit techniques for this annual surveillance audit.

**Appendix 5 – Changes in Certification Scope**

There were no changes in the scope of the certification during the previous year.

**Appendix 6 – Detailed observations (CONFIDENTIAL)**

<b>Evaluation year</b>	<b>FSC P&amp;C Reviewed</b>
2009	All – Recertification Evaluation
2010	P. 1 and P.2;
2011	
2012	
2013	
2014	

**Lake States and Central Hardwood Standard Version 3.0**

**C= Conformance with Criterion**

**C/NC= Overall Conformance with Criterion, but there are Indicator non-conformances**

**NC= Non-Conformance with Criterion**

<b>REQUIREMENT</b>	<b>C/ NC</b>	<b>COMMENT/CAR</b>
<b>P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.</b>		
<b>C1.1 Forest management shall respect all national and local laws and administrative requirements.</b>	C	Observed that foresters are cognizant and respectful of laws in their on-the-ground resource management in the 6 County Forests assessed during this audit.
<b>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b>	C	Payments are routinely paid in a timely fashion  DNR carries out financial audits of County Forests helping to ensure payments are made. Results of 3-year Financial Audits showed that All County Forests are meeting payment obligations.  Ashland County Administrator made the extra effort to make payment to applicable townships at town committee meetings.
<b>C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b>	C	Confirmed awareness of applicable treaties. Most relevant treaty to County Forest Program is Chippewa Treaty. Management plans and actions related to Chippewa Treaty issues are in conformance at All County Forests.

<b>C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.</b>	C	There have been no conflicts between laws and FSC Principles and Criteria.
<b>C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b>	C	During the 2010 audit there was lots of evidence of conformance with Criterion 1.5, and no non-conformances were observed. Evidence of conformance includes: <ul style="list-style-type: none"> <li>• Berming and gating roads (all Counties)</li> <li>• Hiring a recreation officer to control unauthorized ATV activity (Ashland)</li> <li>• Signage used to inform public about regulations</li> <li>• Boundary marking prior to forest management activities</li> </ul>
<b>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b>	C	All County Forests have made commitments to FSC through County Board Resolutions, which are included in the 15-year plans. Counties produced an acceptable response to CAR 2009.8 for clarifying partial certification issues.
<b>P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b>		
<b>C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</b>	C	It is well documented that All County Forests clearly have the long-term right to manage their forests. Property boundaries are appropriately marked prior to timber sales and there is good signage when entering/leaving County Forests.  External legal and customary rights are documented in the 15-year plans.
<b>C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to</b>	C	All County Forests offer exceptional public use opportunities for a large variety of activities. 15-year plans and County Forest websites describe these activities. All County Forests consult with concerned groups in the planning and implementation of forest activities. All County

<p><b>other agencies.</b></p>		<p>Forests provide opportunities for public consultation in long term (15-year plan) and short term (Monthly Forestry Committee meetings). Additionally, All County Forests employ an array of methods (e.g. advisory committee, access planning meetings, open door policy, etc) that collectively assure a substantial level of discourse and consultation with individuals and organizations expressing an interest in the management of county forests.</p>
<p><b>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</b></p>	<p>C</p>	<p>With respect to informal dispute resolution, good relations with stakeholders are maintained through DNR and County Forests staff participation in the community and the open door policy of the Forest Administrator. County Forests also take steps to notify adjacent property owners of upcoming timber sales in an effort to agree on property lines and mitigate potential problems.</p> <p>The laws of the State of Wisconsin provide clear avenues (e.g., the state courts) of recourse for citizens to air and resolve any grievances regarding tenure and use rights. A systematic dispute resolution mechanism is in-place, though not formalized in writing. First, disputes resolution proceeds informally by County Forests providing ample opportunities for appellant to meet and discuss with Country Forest Administrator; then formally, though monthly County Forestry Committee meetings.</p>

Requirement	C/NC	Comment/CAR
<b>Group Management</b>		
<b>PART 1 QUALITY SYSTEM REQUIREMENTS</b>		
<b>C1 General Requirements</b>	C	
1.1 The Group entity shall be an independent legal entity or an individual acting as a legal entity.	C	Group entity, Wisconsin DNR is an independent entity
1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.	C	See Criterion 1.1 - 1.3 on page 33.
1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.	C	Commitment for participating counties is made in the Public Lands Handbook.
1.4 The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards.	C	Public Lands handbook outlines responsibilities and training needs relative to FSC certification.
<b>C2 Responsibilities</b>		
2.1 The Group entity shall clearly define and document the division of responsibilities between the Group entity and the Group members in relation to forest management activities (for example with respect to management planning, monitoring, harvesting, quality control, marketing, timber sale, etc).  <i>NOTE: The actual division of responsibilities may differ greatly between different group certification schemes. Responsibilities regarding compliance to the applicable Forest Stewardship Standard may be divided between the Group entity and Group members in order to take into account of a landscape approach.</i>	C	The DNR's Public Lands Handbook clearly establishes the division of responsibilities between itself and the group members.
2.2 The Group entity shall appoint a management representative as having overall responsibility and authority for the Group entity's compliance with all applicable requirements of this standard.	C	County Forest Program is managed by Jeff Barkley.
2.3 Group entity staff and Group members shall demonstrate knowledge of the Group's procedures and the applicable Forest Stewardship Standard.	C	Group entity staff and group members demonstrate sufficient knowledge of procedures.
<b>C3 Group entity's procedures</b>	C	
3.1 The Group entity shall establish, implement and maintain written procedures for Group membership covering all applicable requirements of this standard, according to scale and complexity of the group including:	C	Described in the Public Lands Handbook.
I. Organizational structure;	C	Described in the Public Lands Handbook.

II. Responsibilities of the Group entity and the Group members including main activities to fulfill such responsibilities (i.e. Development of management plans, sales and marketing of FSC products, harvesting, planting, monitoring, etc);	C	Described in the Public Lands Handbook.
III. Rules regarding eligibility for membership to the Group;	C	Described in the Public Lands Handbook.
IV. Rules regarding withdrawal/ suspension of members from the Group;	C	Described in the Public Lands Handbook.
V. Clear description of the process to fulfill any corrective action requests issued internally and by the certification body including timelines and implications if any of the corrective actions are not complied with;	C	Described in the Public Lands Handbook.
VI. Documented procedures for the inclusion of new Group members;	C	Described in the Public Lands Handbook.
VII. Complaints procedure for Group members.	C	Described in the Public Lands Handbook.
3.2 The Group entity's procedures shall be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements.	NC	CAR 2010.2
3.3 The Group entity shall define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.	C	<p>Division of responsibilities is described in the Public Lands Handbook. WI DNR, the group entity, is clearly a competent forest management agency. The group entity is further strengthened by the Wisconsin County Forests Association, which provides a very effective mechanism for the consideration of problems and policies of concern to the Counties. The DNR Liaison Foresters (at least 1 forester assigned per county) and the institutional capacity of DNR, with its professional staff (hydrologists, pathologists, biologists, etc) and resources (GIS, Recon, nurseries) who and which are available to assist the County Forest program, together serve as the core to successful function of the group scheme.</p> <p>DNR provides funds 50% of the Forest Administrator's salary at each County, thus further strengthening the competency of the program. The specifics of this program are addressed in s. 28.11(5), Wis. Stats., and ss. NR 47.50 through NR</p>

		47.58, Wis. Adm. Code.
<p>3.4 The Group entity or the certification body shall evaluate every applicant for membership of the Group and ensure that there are no major nonconformities with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the Group, prior to being granted membership of the Group.</p> <p><i>NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.</i></p>	C	Described in the Public Lands Handbook.
<b>C4 Informed consent of Group members</b>	C	
<p>4.1 The Group entity shall provide each Group member with documentation, or access to documentation, specifying the relevant terms and conditions of Group membership. The documentation shall include:</p>	C	<p>Maintain the current 4 pronged approach to internal monitoring:</p> <ol style="list-style-type: none"> <li>1) Day to day interaction on County Forest management including DNR approval on all timber sales from both the Liaison forester and the DNR Team Leader</li> <li>2) Certification review annually at Partnership Meetings (Certification discussion conducted by DNR Team Leaders)</li> <li>3) Certification review during County Forest program audits held every 3 years (conducted by DNR Area Staff Specialists and Finance)</li> <li>4) Overall program review and interaction with WCFA Certification Committee by DNR County Forest Specialist</li> </ol> <p>Efforts have been made to do a better job of documenting discussion and asking pointed questions during reviews. Given our current process for timber sale reviews we feel there would be no added value in having additional staff conduct field reviews of timber sales. DNR Liaisons, Team Leaders and other Foresters / Technicians</p>

		routinely are on the ground on the timber sales.
i. Access to a copy of the applicable Forest Stewardship Standard;	C	Yes- standard is available.
ii. Explanation of the certification body's process;	C	Available in Public Lands Handbook.
iii. Explanation of the certification body's, and FSC's rights to access the Group members' forests and documentation for the purposes of evaluation and monitoring;	C	Available in Public Lands Handbook.
iv. Explanation of the certification body's, and FSC's requirements with respect to publication of information;	C	Available in Public Lands Handbook.
v. Explanation of any obligations with respect to Group membership, such as:  <i>NOTE: In some groups, it may be sufficient to provide individual members with a summary of these items, provided that full documentation is readily available on request at the Group entity's offices. The information should be presented in a way adapted to the language and knowledge of the Group members.</i>	C	Available in Public Lands Handbook.
a. maintenance of information for monitoring purposes;	C	Available in Public Lands Handbook.
b. use of systems for tracking and tracing of forest products;	C	Available in Public Lands Handbook.
c. requirement to conform with conditions or corrective action requests issued by the certification body and the group entity	C	Available in Public Lands Handbook.
d. any special requirements for Group members related to marketing or sales of products within and outside of the certificate;	C	Available in Public Lands Handbook.
e. other obligations of Group membership; and	C	None
f. explanation of any costs associated with Group membership.	C	Available in Public Lands Handbook.

<p>4.2 A consent declaration or equivalent shall be available between the Group Entity and each Group member or the member’s representative who voluntarily wishes to participate in the Group. The consent declaration shall:</p> <p><i>NOTE: A consent declaration does not have to be an individual document. It can be part of a contract or any other document (e.g. meeting minutes) that specifies the agreed relationship between the Group member and the Group entity.</i></p>	C	County Board Resolutions and 15 year plans.
i. include a commitment to comply with all applicable certification requirements;	C	
ii. acknowledge and agree to the obligations and responsibilities of the Group entity;	C	
iii. acknowledge and agree to the obligations and responsibilities of Group membership;	C	
iv. agree to membership of the scheme, and	C	
v. authorize the Group entity to be the primary contact for certification and to apply for certification on the member's behalf.	C	
<b>C5 Group Records</b>	C	
<p>5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include:</p> <p><i>NOTE: The amount of data that is maintained centrally by the Group entity may vary from case to case. In order to reduce costs of evaluation by the certification body, and subsequent monitoring by FSC, data should be stored centrally wherever possible.</i></p>	C	Group members maintain records of all the required elements.
i. List of names and contact details of Group members, together with dates of entering and leaving the Group scheme, reason for leaving, and the type of forest ownership per member;	C	No members have left the group.
ii. Any records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard;	C	Training records are maintained in each staff member’s personnel files. The WCFP has been excellent at ensuring county forest staff attend training related to CARs.
iii. A map or supporting documentation	C	County 15-Year Plans and GIS.

describing or showing the location of the member's forest properties;		
iv. Evidence of consent of all Group members;	C	County Board or Committee Resolutions have been passed for each of the participating counties.
v. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems);	C	Management plans and supporting documents (e.g., 2460 forms) are maintained at each County.
vi. Records demonstrating the implementation of any internal control or monitoring systems. Such records shall include records of internal inspections, non-compliances identified in such inspections, actions taken to correct any such non-compliance;	C	Records of internal control/monitoring systems are kept. However, there are no records for auditing group members against the full standard on a sample basis. See CAR 2010.2
viii. Records of the estimated annual overall FSC production and annual FSC sales of the Group.	C	All wood is sold as FSC certified. Records are maintained for production and sales.
5.2 Group records shall be retained for at least five (5) years.	C	All records are retained for at least 5 years.
5.3 Group entities shall not issue any kind of certificates or declarations to their group members that could be confused with FSC certificates. Group member certificates may however be requested from the certification body.	C	WCFP has created no such documents. Group member certificates have been provided by SCS.
<b>PART 2 GROUP FEATURES</b>		
<b>C6 Group Size</b>	C	
6.1 There is no restriction on the maximum size that a group certificate can cover in terms of number of group members, their individual forest property size or total forest area. The Group entity shall have sufficient human and technical resources to manage and control the Group in line with the requirements of this standard.  <i>NOTE: The number of Group members, their individual size and the total area will however influence the evaluation intensity applied by the certification body in their annual audits.</i>	C	WCFP has sufficient human and technical resource to manage the group of this size.
6.2 The Group entity shall specify in their procedures the maximum number of members that can be supported by the management system and the human	C	The maximum number of members is implicitly all 27 of the county forest programs.

and technical capacities of the Group entity.		
<b>C7 Multinational groups</b>	NA	WCFP is not a multinational group.
7.1 Group schemes shall only be applied to national groups which are covered by the same Forest Stewardship Standard.	NA	
7.2 In cases where homogeneous conditions between countries/ regions may allow an effective and credible cross- border or multi-regional monitoring system, the Group entity shall request formal approval by FSC IC through their accredited Certification Body to allow certification of such a group scheme.	NA	
<b>PART 3 INTERNAL MONITORING</b>		
<b>C8 Monitoring requirements</b>		
8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following:		
i. Written description of the monitoring and control system;	C	The monitoring and control system is documented in the Public Lands Handbook.
ii. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with any additional requirements for membership of the Group.	NC	Monitoring visits to a sample for group members does occur but does not cover all the requirements of the applicable FSC standard. CAR 2010.2
8.2 The Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.	C	Criteria to monitor, e.g., financial, open CARs, etc have been defined.
8.3. The minimum sample to be visited annually for internal monitoring shall be determined as follows:  <i>NOTE: for the purpose of sampling, FMUs &lt; 1,000 ha and managed by the same managerial body may be combined into a 'resource management unit' (RMU) according to the proposal made in FSC-STD-20-007 Annex 1.</i>	C	Group members are visited on a 3-year cycle.
<b>a) Type I Groups with mixed responsibilities (see section D Terms and definitions)</b>  Groups or sub-groups with mixed responsibilities shall	C	WCFP meets the sampling intensity guidelines, but does not cover all the aspects of the standard during these internal audits. CAR 2010.2.

apply a minimum sampling of $X = \sqrt{y}$ for 'normal' FMUs and $X = 0.6 * \sqrt{y}$ for FMUs < 1,000 ha. Sampling shall be increased if HCVs are threatened or land tenure or use right disputes are pending within the group.		
<b>b) Type II Resource Manager Groups (see section D Terms and definitions)</b> Group entities who also operate as resource managers may define the required internal sampling intensity at their own discretion for the forest properties they are managing, independent of their size and ownership (the minimum numbers as defined above do not apply here).	NA	
8.4 For monitoring purposes the Group entity should use the same stratification into sets of 'like' FMUs as defined by the certification body in their evaluation.	C	The main differences in FMU's in the WCFP are size and region. For auditing purposes, SCS has tended to sample on a regional strata basis.
8.5 The Group entity should visit different members in their annual monitoring than the ones selected for evaluation by the certification body, unless pending corrective actions, complaints or risk factors are requiring a revisit of the same units.	C	WCFP sampling does not follow the SCS sampling in terms of members visited each year.
8.6 In the selection process of members to be visited, the Group entity should include random selection techniques.	C	No such random selection process is used. CAR 2010.2
8.7 The Group entity shall issue corrective action requests to address non-compliances identified during their visits and monitor their implementation.	C	WCFP has the ability to issue corrective action requests to group members.
8.8 Additional monitoring visits shall be scheduled when potential problems arise or the Group entity receives information from stakeholders about alleged violations of the FSC requirements by Group members.	C	WCFP has the capacity to deal with group member conformance problems as they arise.
<b>C9 Sales of forest products and use of the FSC trademark</b>	C	
9.1 The Group entity shall document and implement a system for tracking and tracing of forest products produced by the Group members which are supposed to be sold as FSC certified.	C	WCFP has a documented procedure for tracking and tracing of forest products.
9.2 For the purpose of ensuring that non certified material is not being mixed with FSC certified material, FSC products shall only be sold according to a sales protocol agreed by the Group members and the Group	C	Sale of FSC products follow protocol agreed by group members and group entity.

entity.		
9.3 The Group entity shall ensure that all invoices for sales of FSC certified material are issued with the required information (see FSC-STD-40-004 V2-0 Clause 6.1.1) and are filed by the group members.	C	Sale prospectus, contract, and haul tickets have the correct information.
9.4 The Group entity shall ensure that all uses of the FSC Trademark are approved by the responsible certification body in advance.	C	All uses of FSC logo go through program administrator Jeff Barkley.