

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

*Indiana Department of Natural Resources,
Division of Forestry, Classified Forest & Wildlands Program*
Indiana

SCS-FM/COC-000123N

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<http://www.in.gov/dnr/forestry/4801.htm>

CERTIFIED	EXPIRATION
15 March 2015	14 March 2020

DATE OF FIELD AUDIT
20 Oct 2014
DATE OF LAST UPDATE
20 May 2015

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Foreword

SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as “well managed,” thereby permitting the FME’s use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

Organization of the Report

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

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Certificate Registration Information

1.1.1.a Name and Contact Information

Organization name	Indiana DNR Division of Forestry		
Contact person	Brenda Huter		
Address	402 W. Washington St., Room W296, Indianapolis, IN 46204 USA	Telephone	317-232-0142
		Fax	317-233-3863
		e-mail	bhuter@dnr.in.gov
		Website	www.in.gov/dnr/forestry

1.1.1.b FSC Sales Information

<input checked="" type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson			
Address		Telephone	
		Fax	
		e-mail	
		Website	

1.1.2 Scope of Certificate

Certificate Type	<input type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input checked="" type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)	7,998 landowners	
Number of FMU's in scope of certificate	10,418 parcels	
Geographic location of non-SLIMF FMU(s)	Latitude: 39°46'02.12" N (Indianapolis) Longitude: 86°09'55.47" W (Indianapolis)	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is: Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac		
privately managed	213,954ha (528,693 ac)	
state managed	0	
community managed	0	

Number of FMUs in scope that are:			
less than 100 ha in area	10,418 parcels	100 - 1000 ha in area	161 parcels
1000 - 10 000 ha in area	0	more than 10 000 ha in area	0
Total forest area in scope of certificate which is included in FMUs that:			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
are less than 100 ha in area		188,200 ha (465,052 ac)	
are between 100 ha and 1000 ha in area		25,754 ha (63,641 ac)	
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs		Many group member parcels meet the definition of SLIMF FMUs, either due to size or intensity of harvests.	
Division of FMUs into manageable units:			
Most FMUs are small enough in size that individual properties are not further divided into management units – some larger properties have stands delineated, with varying management and harvests planned by stand type.			

1.1.3 Non-SLIMF Group Members

Name	Contact information	Latitude / longitude of Non-SLIMF FMUs	

1.2 FSC Data Request

1.2.1 Production Forests

Timber Forest Products	Units: <input checked="" type="checkbox"/> ha or <input type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	213,954 ha (528,693 ac)
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	0
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	Approximately 213,954 ha (528,693 ac)
Silvicultural system(s)	Area under type of management
Even-aged management	
Clearcut (clearcut size range)	
Shelterwood	
Other:	
Uneven-aged management	Approximately 90% of harvests are selection
Individual tree selection	
Group selection	
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	

The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Average annual cut of approximately 30 million board feet (Doyle)
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
The DOF conducts an annual analysis of the most current 5 years of FIA data for the plots located on Classified Forest & Wildlands tracts. This analysis is supplemented with a Continuous Forest Inventory (CFI) being developed on ICFCG parcels, with similar protocols as those used for the state forest CFI program.	
Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i>	
<p>American chestnut (<i>Castanea dentata</i>) White ash (<i>Fraxinus americana</i>) Green ash (<i>Fraxinus pennsylvanica</i>) Black ash (<i>Fraxinus nigra</i>) Blue ash (<i>Fraxinus quadrangulata</i>) American basswood (<i>Tilia americana</i>) American beech (<i>Fagus grandifolia</i>) Ohio Buckeye (<i>Aesculus glabra</i>) Butternut (<i>Juglans cinerea</i>) Black cherry (<i>Prunus serotina</i>) Kentucky coffeetree (<i>Gymnocladus dioicus</i>) Eastern cottonwood (<i>Populus deltoides</i>) American elm (<i>Ulmus americana</i>) Red/Slippery elm (<i>Ulmus rubra</i>) Blackgum (<i>Nyssa sylvatica</i>) Sweetgum (<i>Liquidambar styraciflua</i>) Hackberry (<i>Celtis occidentalis</i>) Sugar (Hard) maple (<i>Acer saccharum</i>) Silver (Soft) maple (<i>Acer saccharinum</i>) Red (Soft) maple (<i>Acer rubrum</i>) Shagbark hickory (<i>Carya ovata</i>) Mockernut hickory (<i>Carya alba</i>) Bitternut hickory (<i>Carya cordiformis</i>) Pecan (<i>Carya illinoensis</i>) Black locust (<i>Robinia pseudoacacia</i>) Honey locust (<i>Gleditsia triacanthos</i>) White oak (<i>Quercus alba</i> and others) Red oak (<i>Quercus rubra</i> and others) Osage-Orange (<i>Maclura pomifera</i>) Sassafras (<i>Sassafras albidum</i>) American sycamore (<i>Platanus occidentalis</i>) Black walnut (<i>Juglans nigra</i>) Black willow (<i>Salix nigra</i>) Yellow-poplar (<i>Liriodendron tulipifera</i>)</p>	

Persimmon (<i>Diospyros virginiana</i>) American Basswood (<i>Tilia Americana</i>) Eastern White pine (<i>Pinus strobus</i>)
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1.2.2 FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough Wood	W1.1 Roundwood	All
W1 Rough Wood	W1.2 Fuelwood	All
W3 Wood in chips or particles	W3.1	All
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species

1.2.3 Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	0 ha recorded; some lands, however, may informally be managed primarily for conservation values, but the majority of Classified Forests are available for harvest; within the overall program, Classified Wildlands are specifically managed for conservation values, but the FSC group certification applies specifically to Classified Forests			
High Conservation Value Forest/ Areas				
High Conservation Values present and respective areas: Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac				
	Code	HCV Type	Description & Location	Area
<input checked="" type="checkbox"/>	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		
<input checked="" type="checkbox"/>	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
<input checked="" type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		

<input type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
<input type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total Area of forest classified as 'High Conservation Value Forest/ Area'				9,820 ac

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

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input checked="" type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
Explanation for exclusion of FMUs and/or excision:	Participants in the Classified Forests and Wildlands Program have the option to opt out of the certified group. Some percentage of landowners have opted out of the certificate and are not included in this scope.	
Control measures to prevent mixing of certified and non-certified product (C8.3):	Those landowners who have opted out of the group may still conduct timber sales, but do not have access to the CoC information or certificate codes and cannot make certified sales. Sales and loads are never mixed between certified and non-certified landowners.	
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)
Uncertified Classified Acres (nonforested acres, landowner declined certification or undecided)	Statewide	227,453

1.4 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):	
19 male workers	7 female workers

1.5 Pesticide and Other Chemical Use

Commercial name of pesticide/ herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year	Reason for use
2,4-D	2,4-D		1,182 acres	Timber stand improvement, invasive species control, grape vine control
Patron 170	2,4 D, 2- ethylhexyl ester		65 acres	TSI grapevine control
Crossbow	2,4-D; triclopyr		2,434 acres	Timber stand improvement, invasive species control, grape vine control
Brush Killer, Triplet	2,4 -D, dicamba, R-2(2-Methy-4 Chlorophenoxy) propionic acid		3.5 acres	Timber stand improvement, invasive species control, grape vine control
Pathway	2,4-D , picloram		312	Timber stand improvement, invasive species control, grape vine control
Milestone	aminopyralid		10 acres	Invasive species control
Banvel	dicamba		30 acres	Invasive species control
Ortho Weed B Gon Max	Dicamba; 3,5,6-Trichloro-2-Pyridinyloxyacetic acid; 2-methyl-4-chlorophenoxyacetic acid		10	Timber stand improvement
Fusilade	fluaazifop-P-butyl		58 acres	Invasive species control
Roundup, Rodeo, Accord, Big & Tuff, Glyph 5, Buccaneer	glyphosate		7635 acres	Timber stand improvement, invasive species control ,warm season grass planting, tree planting
Plateau	Imazapic		25 acres	Invasive species control

Stalker, Habitat	imazapyr		207 acres	Timber stand improvement, invasive species control
Escort	metsulfuron methyl		25 acres	Invasive species control
Tordon	Picloram		4206 acres	Timber stand improvement, invasive species control, grape vine control
Poast	sethoxydim		227 acres	Invasive species control
Volunteer	clethodim		2 acres	Invasive species control
Oust	sulfometuron methyl		203 acres	Timber stand improvement, invasive species control, tree planting
Garlon	triclopyr		2968 acres	Timber stand improvement, invasive species control, grape vine control

1.6 Standards Used

1.6.1 Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard	1-0	July, 2010
FSC Standard for Group Entities, 30-005	1-0	August, 2009
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSGlobalServices.com).		

1.7 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	To	multiply by
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft)	Meter (m)	0.3048
Yard (yd)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	To	multiply by
Square foot (sq ft)	Square meter (m ²)	0.09290304
Acre (ac)	Hectare (ha)	0.4047

Volume Conversion Factors		
To convert from	To	multiply by
Cubic foot (cu ft)	Cubic meter (m ³)	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

2. Description of Forest Management

2.1 Management Context

2.1.1 Regulatory Context

Pertinent Regulations at the National Level	Endangered Species Act Clean Water Act (Section 404 wetland protection) Occupational Safety and Health Act National Historic Preservation Act Archaeological and Historic Preservation Act Americans with Disabilities Act U.S. ratified treaties, including CITES Lacey Act Forest Resources Conservation and Shortage Relief Act National Resource Protection Act National Environmental Protection Act National Wild and Scenic River Act Native American Grave Protection and Repatriation Act Rehabilitation Act Architectural Barriers Act
Pertinent Regulations at the State / Local Level	IC 14-23-4-1 IC25-36.5-1-2 IC 14-32 IC 32-30 Watershed and County ordinances Classified Forest Act Indiana Flood Control Act Licensed Timber Buyers Law Counties: Blue River Commission (Harrison County) Crawford County (road hauling) Greene County (road hauling) Franklin County (selective cutting only in Whitewater River Scenic District)

	Martin County (road hauling) Monroe County (logging permit and road bond) Owen County (road hauling) Perry County (road hauling)
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Regulatory Context Description

As excerpted from the Umbrella Management Plan, p.1

“In the early 1900’s, the majority of Indiana’s forests had been cleared for agriculture and to provide raw materials for a growing nation. The concern about the rate of deforestation and the erosion caused by abandoned agricultural fields led to the passage of the Indiana Forest Classification Act (IC 6-1.1-6) in 1921. This act created the Classified Forest Program. The objective of the program was to protect forests and watershed and promote reforestation by providing landowners a property tax incentive. In 1979 a sister program, the Classified Wildlife Habitat Program, focusing on habitats other than forests was created. In 2006, the two programs were merged into the Classified Forest & Wildlands Program. The statutory requirements of the joint program are contained in Indiana Code 6-1.1-6. The Indiana Administrative Code (312 IAC 15) contains rules that govern the management activity on enrolled parcels.”

2.1.2 Environmental Context

Environmental safeguards:
Inspections of harvest operations during 2014 audit indicated that impacts are being avoided or minimized. A sample of ICF properties are inspected each year for BMP compliance.
Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:
Per DoF procedures, Natural Heritage database surveys are completed when preparing management plans and prior to a harvest. If the Natural Heritage database query indicates possible presence of forest dwelling RTE species, management occurs with the assumption that they are present. Auditors observed conformance with these requirements. Through interviews and file reviews, verified DF’s are using appropriate resources to determine habitat needs of RTE species when Natural Heritage hits come up. Many of the Natural Heritage hits are wetland plants that are outside of timber harvest areas.

2.1.3 Socioeconomic Context

Excerpted from the Umbrella Management Plan, p.9.

“Pre-European settlement the area now known as the state of Indiana was over 85% forested. In 1800 there were 19.8 million of acres of forest; by 1920 the state’s forest cover had been reduced to 1.4 million acres. Land was cleared for agriculture, urban development, and to provide raw material for a growing nation.

Severe erosion and the threat of eradication of Indiana’s forest led to the passage of the Classified Forest law in 1921. The law created the Classified Forest Program which provides a property tax incentive for private landowners to protect their existing forests and to reforest cleared areas. As of December 2011, the program, expanded into the Classified Forest and Wildlands Program, has over 681,500 acres enrolled.

The forest base of Indiana has recovered to over 4.75 million acres. Conversion, fragmentation, and forest pests are the current primary threats to Indiana’s forests.”

“Based on the Classified Forest & Wildland database (September 2009), the average forest parcel size in the ICFCG is approximately 50 acres. The minimum size is 10 acres (eligibility requirement) and the maximum forest tract is 2,134 acres,” (p.11).

2.1.4 Land use, Ownership, and Land Tenure

Excerpted from the Umbrella Management Plan, p.1

“The objectives of the Indiana Classified Forest and Wildlands Program are to encourage better woodland and wildlife stewardship, and protection of Indiana watersheds. Classified Forest and Wildlands must contain a minimum of 10 contiguous acres that support a growth of native or planted trees, native or planted grasslands, wetlands or other acceptable types of land cover. The land must be managed in accordance with a Division of Forestry approved management plan. In return enrolled lands have property tax assessment of \$1 per acre. The landowner does not relinquish control of classified areas, nor does the Division of Forestry become connected with ownership of the land. The program requires that the land be protected from development, livestock grazing, fires that are not part of a management plan, destructive timber harvesting practices and other activities that threaten natural resource sustainability.”

2.2 Forest Management Plan

<p>Management Objectives:</p> <p>The objective of the Indiana Classified Forests and Wildlands Program is to protect forests and watershed and promote reforestation by providing landowners a property tax incentive. The management objectives are to encourage better woodland and wildlife stewardship, and protection of Indiana watersheds.</p> <p>The objectives of the Indiana Classified Forests Certification Group (ICFCG) are broken out by topic:</p> <p>Ecological Objectives</p> <ul style="list-style-type: none"> • To retain and expand the native forests on the landscape • To protect and enhance biological diversity including rare, threatened and endangered species • To retain examples of ecological communities that are not protected on publicly owned properties <p>Social Objectives</p> <ul style="list-style-type: none"> • To increase the group members’ and their communities’ knowledge of forests and the services they provide • To retain the cultural, archaeological, and other socially significant sites on the landscape • To identify forests with high conservation values and manage to maintain and enhance those values <p>Economic Objectives</p> <ul style="list-style-type: none"> • To retain and increase the economic value of ICFCG forests through forest management • To provide revenue to group members through the sale of certified forest products • To provide a source of certified wood for the Indiana wood based industries and to encourage
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<p>the development of new markets for certified wood</p> <ul style="list-style-type: none"> • To maintain the forest land base for the tourism and recreation industries
<p>Forest Composition and Rationale for Species Selection:</p> <p>A clear majority (70%) of the approximately 500,000 acres in the program are considered oak-hickory. The other forest types are listed below by percent:</p> <ul style="list-style-type: none"> • Maple-beech-birch: 14% • Elm-ash-cottonwood: 7% • Softwoods (white-red-jack pine; loblolly-shortleaf pine, other soft wood):4% • Oak-pine: 3% • Oak-gum cypress: 1% <p>Landowners typically select any hardwood species present that is mature and ready for harvest. The advance of Emerald Ash Borer is leading many participants to remove all merchantable ash from their properties, increasing the ash component selected. A drought in 2010 has also lead to high mortality of tulip poplar, and salvage harvests of this species are now common.</p>
<p>General Description of Land Management System(s):</p> <p>As excerpted from the Umbrella Management Plan, p.14:</p> <p>Silviculture in the Central Hardwood Region is less refined than other regions. This is due to the complexity of the species mix, the variety of sites, and the inconsistent results with some methods. The Indiana Classified Forest Certified Group lands are primarily managed under an uneven-aged system. This does not preclude management under an even-aged system when it meets the objectives of the Classified Forest & Wildlands Program and the group member. Group members typically desire the uneven-aged system’s relatively unbroken canopies that maintain their aesthetic appeal and visual continuity...</p> <p>Regeneration methods under the uneven-age system are singletree selection and group selection... Even age methods include shelterwood removals and clearcuts. Intermediate methods include TSI via PCT or commercial thinning.</p>
<p>Harvest Methods and Equipment used:</p> <p>As excerpted from the Umbrella Management Plan, p.18:</p> <p>Below is a list of equipment commonly used on harvest sites in the ICFCG lands:</p> <p><u>Felling</u></p> <ul style="list-style-type: none"> • <i>Chainsaw:</i> Hand held gas powered chainsaws are the most common felling tool used. Chainsaws are also used to top and buck the bole. • <i>Mechanical harvester/feller buncher:</i> A motorized machine that grabs trees and then cuts them. Trees are stacked in piles to be moved to the yard. Use of mechanical harvesters is limited. <p><u>Landing/Skidding</u></p> <ul style="list-style-type: none"> • <i>Rubber tire skidders:</i> An articulated tractor like machine that uses a metal cable or grapple to drag logs from the stump to the log yard. The front of the skidder often has a blade. This is the most common piece of harvest equipment used on the ICFCG lands • <i>Forwarder:</i> A tractor like machine with a grapple and storage bed. The forwarder picks up logs and puts them on the bed of the machine. The logs are then driven to the log landing and unloaded. Forwarders can have rubber tires or tracks. Use of forwarders reduces soil disturbance because the logs are not dragged to the landing. Use of forwarders reduces the

number of trips to the log yard due to the large carrying capacity. Use of forwarders is uncommon.

- *Animal teams*: Occasionally animal teams, typically horses, are used to transport logs.

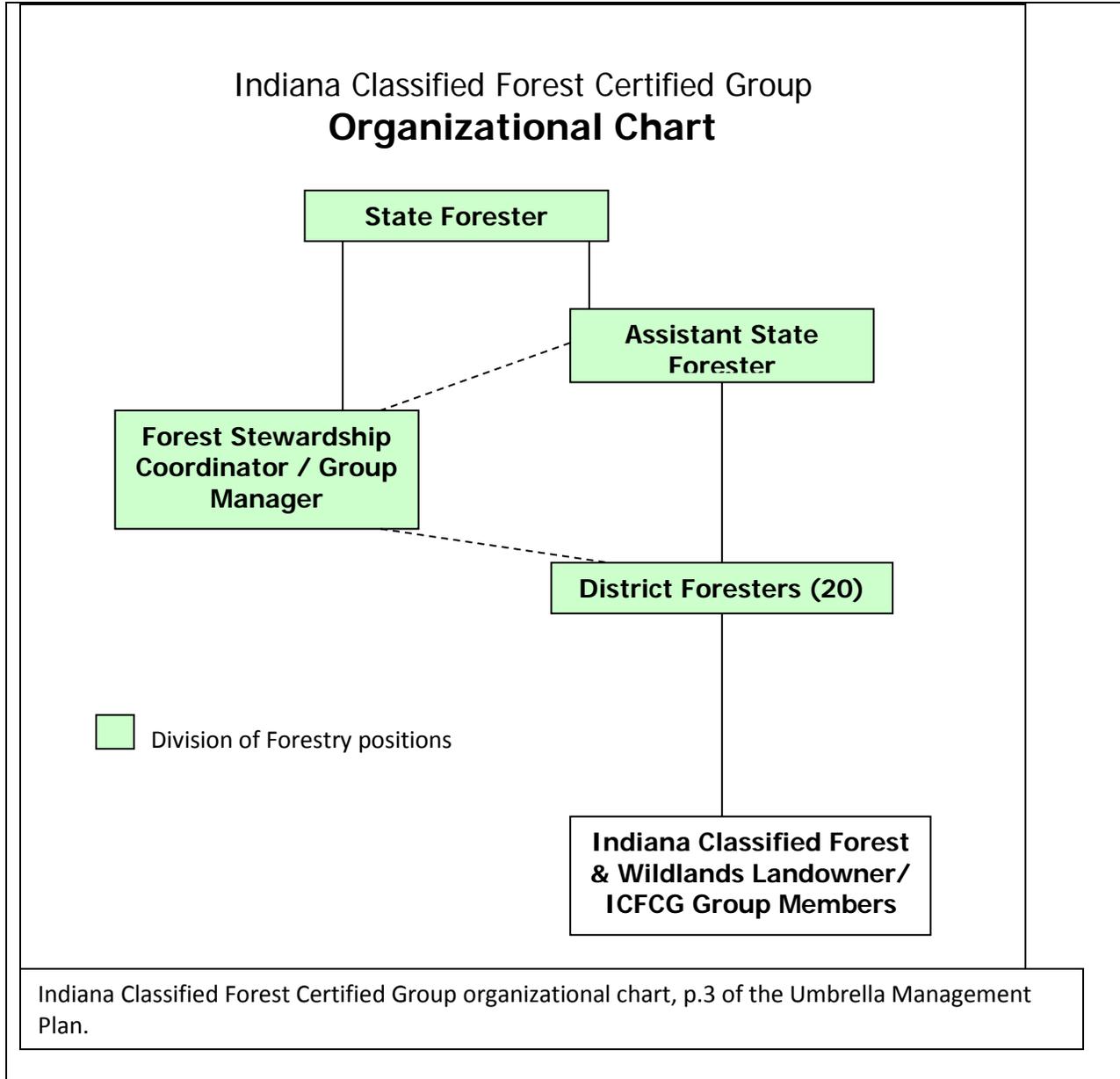
Bucking/Hauling

Bucking done in the yard is typically accomplished with a chainsaw or saw head attached to a boom. A boom is an articulated arm with grapple at the end. Booms are typically used to load logs on to trucks. The boom may be part of the log truck or may be an independent machine called a log loader.

Sale close out

At the end of the sale, installation of erosion control devices such as water bars and broad based dips and the repair of access and haul roads are often needed. This is frequently accomplished using the blade of the skidder or using a bulldozer.

Explanation of the management structures:



2.3 Monitoring System

Growth and Yield of all forest products harvested:

The DOF conducts an annual analysis of the most current 5 years of FIA data for the plots located on Classified Forest & Wildlands tracts. This analysis is supplemented with a Continuous Forest Inventory (CFI) being developed on ICFCG parcels, with similar protocols as those used for the state forest CFI program. Data will capture change in cover type, volume, volume removed, and stocking levels by species group. One-fifth of the plots will be measured each year.

At the group member level, formal inventories are generally not conducted per parcel, and more qualitative assessments of inventory and growth and yield are done. Formal inventories are generally considered for properties >500ac.

Forest dynamics and changes in composition of flora and fauna:
This data is generally captured through the qualitative assessments conducted annually on all parcels and through the CFI data collected as described above.
Environmental Impacts:
A sample of 10% of harvest sites are monitored for BMP impacts annually. All harvest sites are subject to close-out inspections. DoF periodically monitors habitat conditions for all plants and animals as part of its periodic inventory of forest stand types and stocking levels. The location and status of invasive species is routinely monitored by field foresters. DoF works with the Division of Nature Preserves to monitor the condition of protected areas and set-asides.
Social Impacts:
The Indiana Statewide Forest Assessment & Strategy has a rigorous process of stakeholder engagement in order to thoroughly assess the social impacts of forestry operations in the state and strategize for future forestry needs based on stakeholder feedback.
Costs, Productivity, and Efficiency:
Timber management activities on non-industrial properties are structured and monitored to ensure revenue is sufficient to pay for the logging costs and the consulting forester. Since harvests typically only occur every 15-20 years, there is little opportunity to assess productivity and efficiency of management on any regular basis. Land owners use simple cost-benefit calculations to determine efficiency of their overall management choices (i.e., enroll in Classified Forests and manage for timber products).

3. Certification Evaluation Process

3.1 Evaluation Schedule and Team

3.1.1 Evaluation Itinerary and Activities

Date: Monday, Oct 20. 8 a.m.	
FMU/Location/ sites visited	Activities/ notes
DNR Offices 402 W Washington St RM W296	Opening Meeting: Introductions, review audit scope, audit plan, update to FSC and SCS standards and protocols, overview of CFP, review of open CARs/OBS, finalize audit plan details.
Northern Team, District 12: Dave Wager, Phil Wagner, Brad Rody	Review of CFs in Delaware, Jay, and Blackford Counties: 1. Tract 18-019, BLACKFORD COUNTY: 174 acre property with 25 acre individual tree selection harvest conducted in 2013. Understory very heavy to bush honey suckle that will prevent regeneration if stand is opened. Landowner has started treating some of the honey suckle with garlon but has considerable work to do. Harvest done with minimal residual stand damage and no BMP violations. Harvest focused on ash salvage with some cherry and maple. 23,500 BF harvested. 28 acres of tree planting all native species with good mix of oak, walnut, cherry, and other native tree species. Wildlife acres planted with warm season grasses and managed

	<p>for quail and pheasants. Property included wetland restoration area.</p> <p>No timber harvest data available in folder</p> <p>DF completed pre and post-harvest inspections, including pre-harvest conference.</p> <p>No harvest volume information available from district forester.</p> <p>2. Tract 38-0085, JAY COUNTY: 21 acre tract part of much larger property (approx 500 acres) enrolled in Classified. Owner has a forestry degree and does his own marking. Approximately 1000 bf per acre removed over 21 acres. Harvest focused on ash and some wind damaged white oak. Small amount of residual damage. Excellent quality and stock of white oak, hickory and other species left. Understory heavy to sugar maple. Outside of harvest area numerous acres of tree planting all native species with good mix of oak, walnut, cherry, and other native tree species.</p> <p>Wildlife acres planted with warm season grasses and managed for quail and pheasants. Property included wetland restoration area.</p> <p>No timber harvest data available in folder</p> <p>DF completed pre and post-harvest inspections, including pre-harvest conference.</p> <p>3. Tract 05-0085, BLACKFORD COUNTY: 10 acre parcel with heavy cut (approx 272 trees and 7200 bf per acre), driven by landowner economic needs. Most of the volume removed in oak and ash. Remaining volume in hickory, maple, and other species. No TSI planned, but maybe at next re-inspection. Without TSI or openings result of harvest will be acceleration of succession to sugar/black maple and hickory forest. No BMP violations some minor residual stand damage.</p>
<p>Southwestern Team, District 14: Liz Forward, Zack Smith, Donna Rogler, Nathan Fishburn</p>	<p>Review of CFs in Brown and Morgan Counties:</p> <p>1. Tract 07-0078, BROWN COUNTY: Youth camp part of the Forest Bank managed by TNC, in the target area of the Brown Hills for TNC. Visited with Dan Shaver and Chris Negggers (both with TNC) to discuss invasive species control. Toured several areas where bush honeysuckle was recently cut and treated through the EQUIP program (three years of cost share funding, with reporting and treatment monitoring). Both are licensed applicators and prescriptions are in the management plan. Monitoring conducted by NRCS DC or DOF. Discussed FSC chemical requirements and prohibited pesticides.</p> <p>2. TNC Tulip Trace property, BROWN COUNTY: Property owned by</p>

	<p>TNC, used as a sight to do demonstration harvests and office location. Visited two recent harvests. 4 acre opening completed in 2013, lots of defect, low productivity site, poor species mix. Returned to complete TSI by felling all non-merchantable trees, excluding shagbark hickory, which were left for aesthetics, bat roosting and raptors. Girdled edge trees for bird forage. Expecting excellent regeneration, next entry in 20-30 years. Next harvest reviewed was a 2012, 37 ac shelterwood. Removed under and mid-story with girdling and hack and squirt to open sunlight for oak regeneration. Excellent acorn year should provide good seed. USFWS tracked radio collared bats to a roost tree in the shelterwood, following treatment. The open understory should provide excellent bat habitat.</p> <p>3. Tract 07-0324, BROWN COUNTY: Landowner interviews, 37ac, did not notify the DF before harvest. The owner was not very interested in harvesting, but loggers knocked and offered to harvest the tulip and ash, which was dying or damaged after the drought. Removed 200 poplar, 13 ash per the records, but unclear what the tally was or the board feet removed. There is a significant Japanese stilt grass problem, not being treated.</p> <p>4. Tract 55-0002, MORGAN COUNTY: 154 acre, absentee landowner in Ohio with a tenant farmer living on the property. Harvest completed in 2012, reported removing 84 trees on 8 ac. No harvest map, no tally, access to the site unclear and probably through an adjacent landowner – as a result the harvest could not be accessed or visited. Discussed accuracy of self-reported annual report information and frequency of harvest notification.</p>
<p>Southeastern Team, District 15: Paul Pingrey, Brenda Huter, Jayson Waterman</p>	<p>Review of CFs in Randolph and Wayne Counties:</p> <p>1. Tract 68-0147, RANDOLPH COUNTY: 12 acre harvest of mostly ash (preemptive Emerald Ash Borer salvage). A few patch openings were created. A low volume of yellow poplar, oak and other mixed hardwood poles remain. Larger tree retention for wildlife purposes is adequate. Good potential for hardwood regeneration. Deep ruts were left on flatland skid trails. Landowner was interviewed. She expressed satisfaction with DNR assistance and the courteous logger. Timber sale contract in possession of landowner includes safety and BMP compliance terms. Extenuating circumstances possibly motivated the harvest. Concerns: Although the ruts are not channeling water or causing erosion, soil compaction and root damage likely occurred. State BMP manual does not address soil compaction and related losses in soil productivity. District forester said that DNR was not notified until after the harvest was completed. Hence, no pre-sale site inspection occurred with the logger. Auditor notes that forest management plan treats the entire area as a homogenous unit with no individual stand delineation. Maps identify only the parcel boundaries. No timber harvest maps were available.</p>

	<ol style="list-style-type: none"> 2. Tract 68-0148, RANDOLPH COUNTY: Same landowner, harvest treatment and concerns as above, about 25 acres. State Cultural Resources database showed an occurrence on the site. DNR Archeologist provided the details to the landowner. The logger avoided disturbing the historic feature. Landowner completed TSI work in 2000 to cut vines from trees. 3. District Forester’s Office, WAYNE COUNTY: Audit team stopped at district forestry office, a good space in an old state hospital. A part-time program assistant helps with records and calls. Auditor reviewed landowner files and training records. Forester has a metal locker for pesticide storage in a shop building, but no chemicals are in inventory. 4. Tract 89-0111, WAYNE COUNTY: 250 acre harvest of mostly ash (preemptive Emerald Ash Borer salvage). Harvest was marked and administered by a consulting forester, and a pre-harvest site inspection occurred. The selection harvest was light, leaving a well-stocked stand of high quality sawtimber-sized hardwoods. Little residual tree damage occurred, and there was no significant soil rutting or compaction. No timber harvest map was available. Property includes woodland wildlife ponds, an old dam and a 65 acre black walnut plantation. Invasive honeysuckle and vine control work has been accomplished in past. Current cost-sharing request was not funded due to lack of EQUIP funds. Auditor notes that forest management plan treats the entire area as a homogenous unit with no individual stand delineation other than plantations. Maps identify the parcel boundaries but no woodland stratification. No timber harvest map was available. No stand-level inventory data is available in the plan. Plan identifies two possible T&E species (a reptile and a plant) in area, but they were not found on property (District Forester is also a wildlife biologist). Landowner was interviewed. He said that he was reluctant to conduct the harvest but potential losses to invasive EAB were too great. He wants to manage the remaining big trees as a forest preserve (future late successional) and may eventually place it in a land trust. 5. Tract 89-0045, WAYNE COUNTY: 114 acre tract along the East Fork of the Whitewater River is owned by a land trust. The trust has a public Internet site that explains its objective to create a large nature preserve for Indiana bats and other wildlife. The project is looking at landscape-level habitat needs. The trustees are working in coordination with the U.S. Fish and Wildlife Service and Army Corps of Engineers (which manage Brookville Lake, a large reservoir the trust is trying to connect to). The Whitewater River corridor hosts a number of T&E species. The trust does not allow timber harvesting. An old agricultural field on the site was recently planted to a mixture of hardwood trees. Invasive honeysuckle and vine removal is occurring. Pesticides being used are not on the FSC highly hazardous list.
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	<p>6. Tract 89-0085, WAYNE COUNTY: Six acre pine plantation viewed from road, 12 years old. Owner had hired a consultant to treat invasive oriental bittersweet vines. No archeological or T&E species concerns were noted.</p>
<p>Date: Tuesday, Oct 21; 8 a.m.</p>	
<p>FMU/Location/ sites visited</p>	<p>Activities/ notes</p>
<p>Northern Team, District 2: Dave Wager, Phil Wagner, Tim Eizinger</p>	<p>Review of CFs in Kosciusko and Fulton Counties:</p> <ol style="list-style-type: none"> 1. Tract 43-0207 and adjacent areas, KOSCIUSKO COUNTY: 230 acre parcel with numerous activities including: natural forest plantings, inventory, baseline aquatic study on Elk River tributary and invasive control (multiflora rose, bush honeysuckle and garlic mustard). Most recent timber activity was small ash salvage ahead of EAB. No concerns on harvest. Natural forest plantings began in 1985, mostly using rows of white pine as trainer trees. Annual outreach Akron Elementary students including tree planting and forest visit. Plan and BMPs were followed. Pre and post-harvest visit by DF for ash harvest. Interview owner Dean Baker and daughter Sarah. 2. Tract 43-0004, KOSCIUSKO COUNTY: 27 acre mixed hardwoods. Approximately 1150 bf removed per acre. Contract contained damage penalty, OSHA, and BMPs. Pre and post-harvest inspection. Plan and BMPs were followed. 3. Tract 25-0065, FULTON COUNTY: 19 acre forest on low quality sand dune deposit. 44,000 bf removed over 19 acres. Harvest of over mature black oak and other species that were declining. DF was not aware of this harvest until annual report filed. No volume harvested by species. 4. Tract 25-0097, FULTON COUNTY: 28 acre mature mixed hardwood stand with some wind damage. Plan updated in 2011. Landowner has no interest in harvesting. 5. Tract 25-0000, Reed Property, FULTON COUNTY: 233 acre mixed hardwood and bottom land hardwood. Harvest removed 149,000 bf. Windthrow after the harvest opened the stand up more than intended, but regeneration acceptable. No BMP issues. Mixed hardwood natural stand planting from 90's doing well.
<p>Southwestern Team, District 4: Liz Forward, Zack Smith, Allen Royer.</p>	<p>Review of CFs in Putnam and Parke Counties:</p> <ol style="list-style-type: none"> 1. Tract 67-0652, PUTNAM COUNTY: 325 acre, 2013 annual report listed 48 acre harvested, 252 trees and 100,800 bd. ft, and grape vine control. The harvest was marked by a consulting forester, as noted in the report. The annual report is always checked before re-inspection visits. No species data is given in the annual report but know they removed ash, drought damaged tulip poplar and some oak. On this sale the DF worked with the consulting forester. Discussed how often DF is notified prior to harvest – depends on the district. One cull tree marked for logger select –

	<p>discussed wildlife trees and marking cull. Sold as a lump sum sale. Following the 2012 drought harvest levels have risen considerably as landowners want to remove stressed poplar and ash ahead of EAB. Discussed landowner interests – more interest in managing for wildlife now, to hunt deer or turkey, so may see more openings or food plots.</p> <ol style="list-style-type: none"> 2. Tract 67-0036, PUTNAM COUNTY: Property has been in 5 generations of management. Two tracts, total of 200 acre. Visited invasive control site, 3rd year of EQIP grant to control bush honeysuckle. Excellent control, cut it then sprayed with tordon and garlon. Monitoring and reporting done through the EQIP requirements. Planted walnut stand, discussed planted stands and trainer trees (usually pine) and planting of off-site pine species. Not really done anymore, few benefits. Discussed planting a species mix, to increase stand diversity and ensure healthy crop trees. Species mix chosen with soils in mind – all seed collected within 50 miles, grown out on DOF nurseries and seedlings bought through cost share. 3. Tract 67-0079, PUTNAM COUNTY: 89 acre, active harvest site, operators taking 560 trees over 65 ac. At least 150 trees were ash – hired consulting forester to select the trees. Landowner reported quite a range on the bids received. Landowner reported interest in managing the woods more aggressively and was planning to girdle the cull trees and attend a seminar through the IFWOA to learn about inventory and invasive species. Harvested tops are going to pellet factory, so the whole tree will be utilized. 4. Tract 61-0230, PARKE COUNTY: Two tracts, 12.5 acre, and 37.2 acre, main goals are wildlife habitat, recreation, enjoyment and timber. Planted a field with trees and had to redo application to join the program. Interview with consulting forester. Visited food plots for deer and turkey, seeded for wildlife food. Mowing in rows between plantings and then chemical treatment in the second year. 5. Tract 61-0192, PARKE COUNTY: 193 acre, management plan from 1997. 2013 harvest of 120 trees off 100 ac, no species or volume information reported. TSI on 50 ac and trail improvement done. Harvest was a very light touch, couldn't find the harvest unit, steep ravines to the creek bottom.
<p>Southeastern Team, District 17: Paul Pingrey, John Seifert, Brenda Huter, Darrell Breedlove</p>	<p>Review of CFs in Dearborn and Switzerland Counties:</p> <ol style="list-style-type: none"> 1. Tract 15-0070, DEARBORN COUNTY: 11 acre tract of degraded hardwoods, probably once a pasture on poor, rocky soil. Landowner sold 110 trees to a logger, motivated by concern about EAB losses, although the logger left smaller diameter sawtimber ash. No pre-harvest meeting occurred because the District Forester was not informed of the cut until after it was completed. Discussed role of consulting foresters and opposition to certification. Tree tops were dropped into an intermittent

	<p>stream channel, but forester said it is not a BMP violation since the drainage is not “a blue line stream.” Residual stand is low-quality pole and small-saw hardwood and cedar, and there is little established regeneration. Landowner has expressed an interest in hand planting oaks, but it appears that deer browsing will be a significant factor. District Forester said he will contact the landowner about repairing the fence between the woods and a pasture since it appears that cattle have been getting through.</p> <p>2. Tract 15-0050, DEARBORN COUNTY: The landowner (a professional logger) had harvested 16 yellow poplar trees that were declining due to 2012 drought stress. He had also done invasive ailanthus control with an approved herbicide. On the walk through, the landowner noted numerous ash trees that appeared to be declining. The District Forester recommended additional salvage work ahead of EAB. The landowner operates a small sawmill. He had a good supply of red cedar posts that he had manufactured, utilizing an otherwise hard-to-market resource. He said the untreated posts (which had been peeled down to mostly heartwood) provide a nice alternative for people who don’t like chemical preservatives.</p> <p>3. Tract 78-0029, SWITZERLAND COUNTY: 13 acre harvest in a small tract, heavy to yellow poplar that was damaged by drought stress. District Forester had prescribed a single tree selection and group harvest. Auditor noted that the prescription did not include any basal area residual or measurable target for volume to remove (which was consistently true for all the harvest sites that were sampled during the audit). Forester responded that loggers and consultants in the area are not accustomed to using basal area considerations. District Forester said that a pre-sale conference did not occur since DNR was informed of the harvest only after it was completed. The landowner sold the timber on shares, but the logger provided no detailed volume or species information. The site had deep ruts (and likely soil compaction), but the District Forester said the work is compliant with Indiana water quality BMPs. Harvest resembles a high-grade, but vigorous yellow poplar regeneration will recover the site.</p> <p>4. Tract 78-0049, SWITZERLAND COUNTY: 117 acre tract with no reported activity. The landowner, an elderly woman who had recently lost her husband, came along for the walk through. She explained that her primary objective is for recreational land to be enjoyed as a family legacy. She is open to management recommendations and was attentive to the District Forester’s advice about ash salvage, TSI and invasive control. Auditor notes that although the property has variable stand density and composition, the entire tract is typed and mapped as one homogenous unit.</p> <p>5. Tract 78-0049, SWITZERLAND COUNTY: 232 better-quality ash</p>
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	<p>and other hardwoods had been marked for harvest (no stump marks, though), scattered over a 108-acre steep hillside property. Timber was marked by a logging company's procurement forester, who had provided the information in advance of cutting to DNR. Ash salvage was the primary motivation, although most 11-15 inch ash had not been marked. The long woods road leading to the hilltop is steep in places and does not have any diversions to direct water flow off the surface. Channeling along the side of the road appeared as if washouts have occurred in the past.</p> <p>6. Tract 78-0135, SWITZERLAND COUNTY: 56 acre tract where the landowner is trying to control a heavy infestation of invasive Oriental bittersweet. The landowner used a product called Patron 170 sold over-the-counter at a local farm store. <i>Patron 170 includes a 2,4-D, 2-ethylhexyl ester formulation considered highly hazardous and prohibited by FSC.</i> DNR inspected the work as part of a cost-sharing after the landowner reported the use. The District Forester sent the landowner a letter of non-conformance on April 14, 2014 directing him to not use the prohibited product again. The landowner has since been using Garlon® 4 and glyphosate products.</p>
<p>Date: Wednesday, Oct 22; 8 a.m.</p>	
<p>Northern Team, District 1: Dave Wager, Phil Wagner, Steve Winicker</p>	<p>Review of CF's in Marshall, Starke, and St. Joseph Counties</p> <ol style="list-style-type: none"> 1. Tract 50-0410, MARSHALL COUNTY: 39 acre parcel of mixed hardwood with high component of black walnut. Part of property was planted to black walnut and tulip poplar in mid-1990s. Plantation growing well. Recent improvement and salvage harvest focused primarily on ash and improving growing stock of merchantable species. No BMP issues. 2. Tract 75-0075, STARKE COUNTY: 200 acre property with bottomland and mixed hardwood sites impacted by August 2012 wind event. Hardest hit area of blowdown was salvaged and is being left to regenerate naturally. High deer density, but owner hunts the property heavily. Firewood salvage occurring in areas where blowdown was less intense. No BMP issues observed. Property was gated. Interview with landowner. 3. Tract 75-0046, STARKE COUNTY: 38 acre property divided into two stands (east and west). Audit visited active harvest on the east stand. Overstory dominated by cottonwood, hackberry, locust, and some oak. Harvest was triggered by desire to salvage ash. Approximately 97,000 bf removed over 38 acres. High levels of pawpaw in the understory may inhibit desired regeneration. Minor levels of residual stand damage. Some excessive skid trails (too close together) and rutting. 4. Tract 71-0121, ST JOSEPH COUNTY: 15 acre property with good quality oak and sugar maple. 57,000 bf removed over 15 acres. No regeneration openings, though they were discussed in the plan. No BMP issues.

	<p>5. Tract 71-0125, ST JOSEPH COUNTY: 25 acre oak hickory forest with high stocking. Firewood harvesting has occurred over last 10 years, but the stand remains overstocked with good quality timber. A light timber harvest was marked and cutting had begun. Owner had completed invasive control including hand pulling garlic mustard and glyphosate treatment of honeysuckle and autumn olive- though more work was needed on multiflora rose and honey suckle. Owner has held logger training with Soren Erikson on property and invited member of the community to participate.</p> <p>6. Tract 71-0119, ST JOSEPH COUNTY: 38 acre property dominated by high quality sugar maple with beech, oak, tulip, and ash. Very productive site that has had several harvest over the last 12 years and still has good growing stock. Excellent sugar maple regeneration and no BMP concerns visible. DoF inspecting the sale had noted minor rutting, but it looks to have been repaired.</p> <p>7. Tract 71-075, ST JOSEPH COUNTY: 104 acre tract with no record of harvesting. Tract appears to be late second growth as the coarse wood and decadence of an old growth stand were not present. Some parts of the tract may qualify as Type II old growth, but the property had not been surveyed against DoF’s definition. Owner does not have any current timber management objectives and this was reflected in the management plan.</p>
<p>Southwestern Team, District 5: Liz Forward, Zack Smith, Jeremiah Lemmons</p>	<p>Review of CFs in Vigo, Greene, and Clay Counties:</p> <p>1. Tract 84-0107, VIGO COUNTY: Sycamore Trails RC&D; not public land, but can be accessed with a group – used to be owned by TNC. 5 stands set to be harvested every 3 years plus core area which is left intentionally unmanaged, with just invasives control. 15 year rotation. Recent sale on 39 acre, TSI not completed yet. Two deer enclosures, all volunteer work. Discussed TSI, core area management, opening regeneration and BMP problem in the creek and on the skid trail. Both BMP problems repaired.</p> <p>2. Tract 84-0068, VIGO COUNTY: 108 acre, DoF forester met with landowner and consulting forester for pre-harvest inspection. Last harvested in 1989. For current harvest landowner wants to get the ash out. Deep ruts, landowner unhappy with the ruts left behind. She made the operator come back out to repair the ruts. No openings, just selection. Took out some walnut veneer logs and poplar. Interview with landowner suggested more information on wildlife and wetland management would be helpful. Discussed alternative economic uses of private land including hunting leases, basecamp leasing, where they aggregate policies through websites to provide a revenue stream to private property owners. Using cost-share programs for TSI and invasive control. Small scale maple syrup production.</p>

	<ol style="list-style-type: none"> 3. Tract 11-0032, CLAY COUNTY: 27 acre, met with timber buyer on site and toured the property as it was his first classified job and he wanted to meet with a district forester. Timber buyer wanted opinion on the mark – had marked mostly dying/salvage poplar and some <1 ac openings, marked mature beech even though it is hollow. Discussed wildlife trees, legacy trees, wildlife value vs. harvest. Serious issues with legacy ruts and stream crossings from previous harvest. 4. Tract 11-0020, CLAY: No harvest, visited to review invasive species control. Bush honeysuckle treatment, 3rd year of EQIP program, land is on the edge of a mine overburden on a hillside. Used glyphosate and manual cutting, hardly any honeysuckle left. The landowner reports to NRCS every year and the DoF monitors the treatment annually. Also treated autumn olive. 5. Tract 28-0081, GREENE COUNTY: 275 acre, District forester delineated stands, but did not conduct inventory. Last removal was 1518 trees, over 450,000 bd ft. Salvage for tulip poplar and ash, then took oak, aspen and marked over the entire property. All selection, no openings, TSI not yet completed. Seeded the log landing and any trails at landowner request – not too common. Two consulting foresters assisted, sold as certified.
<p>Southeastern Team, District 20: Paul Pingrey, John Seifert, Brenda Huter, Ben Mckinney</p>	<p>Review of CFs in Jackson and Washington Counties:</p> <ol style="list-style-type: none"> 1. Tract 36-0000, JACKSON COUNTY: 28 acre tract where a portion had been logged to salvage drought-damaged yellow poplar. There was no timber sale map showing the location of the harvest. DNR was notified of the planned harvest and a pre-sale meeting occurred. The landowner’s objective is to manage the land for timber production, and he has been doing crop tree release thinning. Yellow poplar regeneration is well-established. 2. Hemlock Bluffs State Natural Area: Drive through a state property identified as a hemlock remnant. No woolly adelgid injury noted. 3. Tract 36-0125, JACKSON COUNTY: Private Classified Forest tract adjacent to the above natural area. The 31-acre woodland is being managed by the owner’s son, who is a graduate forester. The audit team completed a walk-through and observed a lot of good work to release hardwood crop trees by girdling competition. Cavity trees for wildlife were being maintained. The forest management plan recommends such TSI, but the absence of a stand map made it difficult to locate the best chances or where the landowner was doing the work. The land is mapped as one homogenous area, although there are variable cover types. 4. Tract 36-0021, JACKSON COUNTY: Landowner was in the process of clearing this 20-acre tract and converting it to an agricultural field. The merchantable timber was gone, and a dozer operator had grubbed out stumps over half the area. The Group Manager said she had only recently received a Classified

	<p>Forest withdrawal application from the landowner The tract will be removed from the Classified Forest & Wildland Program.</p> <p>5. Tract 36-0000(number not provided), JACKSON COUNTY: An 87-acre tract where the plan included a prescription for harvests in 2013. The landowner contracted with a consulting forester who marked a selection harvest in part of the woods and designated a regeneration cut in a 15-20 acre area. DNR was notified in advance, and pre-harvest inspection was conducted. Harvesting was completed last year. Excellent oak regeneration was observed in the regeneration block, which also had adequate retention. The consulting forester shared the harvest volume information with DNR but prepared no timber sale map. The map for the forest management plan (which was amended by the District Forester to reflect the harvest) also does not include any stand boundaries, which makes the location and size of the regeneration block difficult to determine. The landowner insisted on good BMP practices, including seeding the log yard and installing numerous water diversion bars on the roads.</p> <p>6. Tract 36-0000(number not provided), JACKSON COUNTY: 65-acre tract owned by a logger. The owner is in the process of taking out scattered ash as a preemptive salvage. It appears that the landowner has regularly taken scattered marketable trees without the benefit of any silvicultural objective. The residual shade is causing a conversion to mostly beech and soft maple and a loss of shade intolerant yellow poplar.</p>
<p>Date: Thursday, Oct 23. 8:00 – 1:00</p>	
<p>Northern Team, District 19: Dave Wager, Phil Wagner, James Potthoff</p>	<p>Review of CFs in LaPorte County:</p> <p>1. Tract 46-0003, LAPORTE COUNTY: 21 acre parcel with moderate intensity harvest of approximately 2,000 bf per acre. Some minor areas of excessive skid trails. Excellent sugar maple regeneration. Minor amount of invasives including bush honeysuckle. TSI recommended but has not occurred. Harvested by Pike Lumber. DF not notified of sale. Post-harvest inspection done.</p> <p>2. Tract 46-0229, LAPORTE COUNTY: 45 acre parcel harvested winter 2014. Volume for overall sale was 203,000 bf, but that included area outside of CFW Program. Good conformance with BMPs and no significant residual stand damage. Temporary crossing used for wet area. Operators stopped working when wet and moved to another location. Medium priority need for grape vine and ailanthus TSI. However, landowner not interested. Both DF and consulting forester recommended TSI. Contract covered BMPs. Sale sold as FSC certified and forester separated volume tally, sale boundary, and tree marking to distinguish certified from non-certified.</p> <p>3. Tract 46-0062, LAPORTE COUNTY 22 acre tract with improvement and economic harvest. Approximately 1700 bf per acre removed. Small (1/4 acre) pocket of</p>

	<p>grape vine tangle with failed regeneration. No BMP problems or residual stand damage. Small area of tornado blowdown that had regenerated nicely to sugar maple. No pre-harvest conference occurred.</p>
<p>Southwestern Team, District 18: Liz Forward, Zach Smith, Amy Spaulding, Ralph Unversaw</p>	<p>Review of CFs in Owen County:</p> <ol style="list-style-type: none"> 1. Tract 60-0010, OWEN COUNTY: 52 acre total, 20 acre harvested in 2013, approx. 395 trees sold certified. Worked with timber buyer, who notified the district forester before the sale. Only certain buyers know to notify the forester. Estimates 70% of landowners are working with someone on harvests. Archeology search submitted to archeologist in Indy, the most frequent hit is cemeteries. Walked the property with the landowner, who didn't like the harvest at first, but then got used to the way it looked. Discussed how it's hard to take trees out and not have your land look different for a few years. Discussed TSI and what it could do to open up the stand for regen. 2. Tract 60-0463, OWEN COUNTY: 37 acre, TSI completed in 2013, harvested in 2012. Girdled sugar maple and ash to release hickory. Worked with professional forester. 3. Tract 60-0143, OWEN COUNTY: Interview with owner's son, who thought the logging had been diameter limit. However, site inspection indicated this was not the case. DoF not notified prior to harvest. Many large trees left, no evidence of TSI, could not contact landowner. Difficult to find marked stumps in the woods. 4. Tract 60-0479, OWEN COUNTY: Cuts and hauls his own logs, only does salvage of dead or declining trees. Does it on a continuous basis, not notifying DoF. It's a weekend home, interview with landowner indicated he was interested in certification and making more certified sales, but didn't realize it was an option.
<p>Southeastern Team, District 6: Paul Pingrey, John Seifert, Brenda Huter, Rob McGriff</p>	<p>Review of CFs in Jennings and Bartholomew Counties:</p> <ol style="list-style-type: none"> 1. 40-0321, JENNINGS COUNTY: A 140 acre tract (mapped as one stand, but with apparent variability in age and density), which has been in the ownership of the same family since 1872. The tract was enrolled in the Classified Forest & Wildlands Program in December 2013. Before the enrollment occurred, the landowner had a consulting forester set up and sell a selection harvest. The residual is a well-stocked stand of quality hardwood poles with a few group-selection openings. Water bars were placed on skid roads. The plan calls for TSI in the future to release crop trees and deaden weed trees in the patch openings. Overall, nice property with good regeneration. 2. 40-0126, JENNINGS COUNTY: Audit team visited two stands about a mile apart. Both had received a selection harvest established by a consulting forester. The consultant had tried to contact the District Forester for a pre-sale conference, but he was out of the state on a fire control assignment. The cutting

	<p>was just completed in August, perhaps by different crews. The first area, about 20 acres, showed little rutting and a professional logging job. The residual is a well-stocked stand of pole-sized and sawtimber hardwoods. The site has a lot of cavity trees for wildlife. The second area, about 40-acres, was also well marked and has a good residual. The audit team observed many high stumps, however, with poorer utilization and more residual damage. The operators had attempted installing water diversion bars on the skid roads, but they were improperly placed and ineffective. It appeared doubtful that the operator on the second site understood proper BMP techniques.</p> <p>3. Tract 40-0031, JENNINGS COUNTY: This site was added when the auditor requested a visit to an old-growth forest enrolled in the Classified Forest & Wildlands Program. The 61 acre property known as Guthrie Memorial Woods Nature Preserve is owned by a land conservancy. According to the forest management plan, the tract was enrolled in Classified Forests on March 22, 1921 and is one of the oldest in the program. The plan says the north half of the tract has never been harvested (FSC Type 1 Old Growth, although the plan does not use that terminology). The south half of the tract was clearcut in 1927, but no harvesting has occurred since (possible Type 2 Old Growth). The on-line description of the preserve says, “Guthrie Memorial Woods is truly unique because this classic flatwoods has no elevation change greater than 10 feet. The imperfectly drained soil retains water in the spring and often becomes bone dry in late summer and early fall. The southern two-thirds of this beech-sweetgum-white oak community has medium and small-sized trees while the northern section contains the larger and more mature specimens.”</p> <p>The audit team walked through the north half. The stand is composed of an impressive mix of very large (24” to 50” DBH) oaks, poplars, beech, maples and other hardwoods. It is characterized by large woody debris, tip-up root mounds, and high shade. The only management activity prescribed in the plan is monitoring for invasive species. Although the tract is recorded in the state natural heritage database as an “upland flats forest” natural area, it is not included in any Classified Forest inventory of HCVF old-growth. The District Forester recalled some training about old-growth, but he was unaware that he should have nominated the tract for the HCVF inventory. The District Forester said he is aware of more tracts (e.g., Tribbett Woods) with similar old-growth, but they have not been inventoried as HCVF. On-line research by the auditor found an article “Old Growth in the East” by M.B. Davis (2003, 2005) with a comprehensive list of Indiana Old-Growth sites, some of which might also be Classified Forest tracts but not in any Classified</p>
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	<p>Forests HCVF inventory.</p> <p>4. 03-0022, 0093, BARTHOLOMEW COUNTY: 128 acre tract that received a combination of group selection and individual tree selection harvests in 2013. The landowner said that he hired a consulting forester to do a stand-level forest inventory and detailed forest management plan. Although the DNR management plan lumps the entire woodland into one stand, the landowner said the consultant-prepared plan identifies distinct cover types that were treated differently in the harvest (the group selection cuts occurred on the south slope to encourage oak regeneration). Having an inventory enabled the landowner to use capital-gains income tax treatment for the harvest income, saving a substantial amount on his federal and state income taxes. The consulting forester marked the timber and sold it on a sealed-bid basis, requiring full payment before cutting commenced. The DNR District Forester was informed of the planned harvest. He conducted pre-harvest, mid-harvest and close-out sale inspections. The audit team walked through the property and noted a well-conducted harvest (minimal residual tree damage, proper silvicultural prescriptions and implementation, good BMP practices, etc.). The landowner has also been engaged in numerous wildlife and forest improvement projects (a woodland pond, tree and shrub planting, prairie establishment, crop tree release, vine removal, etc.). He is also active in the state woodland owners association, providing leadership on landowner education projects.</p>
Date: Thursday, Oct 23. 3:00-5:00	
DNR Offices 402 W Washington St RM W296	Auditors convene in Indianapolis to discuss findings.
Oct 31, 11am	Closing meeting (via phone)

3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	4
B. Number of auditors participating in on-site evaluation:	3
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
D. Total number of person days used in evaluation:	15

3.1.3 Evaluation Team

Auditor Name:	Dave Wager	Auditor role:	Lead Auditor
Qualifications:	As previous FM Director for SCS, Dave spent ten years managing and/or leading Forest Stewardship Council (FSC) endorsed certification assessments on more than 100 forest management operations covering over 25 million acres of forestland across 16 countries. As a certification practitioner, Dave Wager has led FSC forest management and chain-of-custody assessments on a range of private and public operations across North America, Asia, and Latin America. In other natural resources work, Dave played a key role in the development of Starbucks CAFE Practices- a program to ensure procurement of sustainably grown and processed		

	coffee. Dave has 17 years' experience working in forestry and the environmental field. He has expertise in forest ecology and business (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University). While studying forest ecology at Utah State University, Dave was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth in Utah's Central Wasatch Mountains.		
Auditor Name:	Liz Forward	Auditor role:	Auditor
Qualifications:	Ms. Forward is a Certification Forester in the SCS Forest Management program. She holds a B.A. in Human Biology from Stanford University and Masters of Environmental Management and Masters of Forestry degrees from Duke University's Nicholas School of Earth and Environmental Science. She has worked in rural land use planning in Colorado and Montana and in forest certification and sustainable agriculture in Indonesia. She is an ISO accredited lead auditor and a Registered Professional Forester (RPF #2974) in the state of California. She has conducted forest management and Chain of Custody evaluation and surveillance audits throughout the United States and Indonesia.		
Auditor Name:	Paul Pingrey	Auditor role:	Auditor
Qualifications	Paul Pingrey began as an independent auditor for SCS Global Services in 2010. He is an ISO19011 accredited lead auditor for Chain of Custody and forest management reviews. His work for SCS builds on 35 years of experience at the Wisconsin Department of Natural Resources. Positions included DNR Forest Certification Coordinator, Private Forestry Staff Specialist, Wisconsin Forest Tax Law Supervisor, and Madison Area Forestry Supervisor. From 2004 to 2009, Paul oversaw Forest Stewardship Council, Sustainable Forest Initiative, and American Tree Farm System certification for 6 million acres of DNR forestry programs. He assisted a national panel that developed the FSC-US Forest Management Standard in 2008-2009. His career with Wisconsin DNR included work with small woodland owners in six southern Wisconsin counties, state park and county forest operations, property master planning, and environmental impact assessment. He served in Society of American Foresters leadership positions and was chair of the National SAF Certification Working Group. Paul received a forest management degree from Iowa State University in 1974 and completed U.S. Forest Service Silviculturist Certification in 1988.		

3.2 Evaluation of Management System

3.2.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME's conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments,

and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3.2.2 Pre-evaluation

A pre-evaluation of the FME *was not* required by FSC norms.

A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

3.3 Stakeholder Consultation Process

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Principal stakeholder groups are identified based upon results from the pre-evaluation (if one was conducted), lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders in this evaluation:

3.3.1 Stakeholder Groups Consulted During Evaluation for Certification

FME Management and staff	Pertinent Tribal members and/or representatives
Consulting foresters	Members of the FSC National Initiative
Contractors	Members of the regional FSC working group
Lease holders	FSC International
Adjacent property owners	Local and regionally-based environmental organizations and conservationists
Local and regionally-based social interest and civic organizations	Forest industry groups and organizations
Purchasers of logs harvested on FME forestlands	Local, state, and federal regulatory agency personnel
Recreational user groups	Other relevant groups

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments. The table below summarizes the major

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

3.3.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

Stakeholder Comments	SCS Response
Economic Concerns	
<p>Oh, am I certified? I’d be interested in selling my wood as certified, but I don’t really know what that means, or how to do it. Who can I sell it to? What do I have to do?</p>	<p>Numerous group members, when interviewed, did not realize they were already part of the certified group. They understood they were in the Classified Forest & Wildlands Program, but not that they were certified. In one instance the loggers were making a certified sale on a member’s timber, but the owner was unaware he was certified. When informed, many group members expressed interest in being certified, or in making more certified sales, but their understanding of the system was marginal. The auditor noted the effort made by the District Foresters in communicating with landowners and educating them about the system and recognizes that further effort to educate landowners is not feasible at this time, due to limited DoF capacity. Instead, the focus should be on adequate training of all District Foresters in the functioning of the certified group, and that knowledge will be passed as needed to group members. See CAR 2014.15.</p>
<p>I’m not sure I want to be certified, if I am. I don’t think it’s a good idea to get locked into any kind of management, and then when I pass my land on to my kids they are locked into that system too.</p>	
<p>At times it is difficult to get group members to invest in follow-up TSI.</p>	<p>The audit team noted some group member properties that could have benefited from follow-up TSI work. However, in no instances did the lack of TSI result in an inability to meet the FSC standards at this point in time.</p>
<p>Concern about losing ash trees to emerald ash borer (EAB)</p>	<p>District foresters have been very pro-active encouraging landowners to harvest ash if feasible. As there is no resistance or treatment to control EAB, salvaging ash before it dies is an economically responsible strategy.</p>
Social Concerns	
<p>As a consulting forester, I try to discuss management goals with everyone – want to tailor management to people’s needs. Folks in the Classified program are more in tune with management than the general population. Coordination with District Foresters depends on the property – doesn’t always coordinate before harvests, but does before TSI. He doesn’t know much about certification, but tries to mention it to people not in the classified program, in case they can get a benefit</p>	<p>Numerous conversations during the audit held by auditors with District Foresters, consulting foresters, timber buyers and group members indicated that most often District Foresters are not being notified prior to harvests. Please see CAR 2014.1 and OBS 2014.8.</p>

from certain mills for certain products.	
Environmental Concerns	
Although we are generally happy with the harvest, we don't like the ruts in our woods. They hold standing water now, and the crew just dug the old ruts deeper. I've called them and told them I won't accept it and they said they'll come back and smooth it out.	Although residual stand damage, most notably impacts at stream crossings, road or trail erosion, water bar placement and rutting, did not rise to the level of a violation of BMPs, in some instances repair work was needed. Please see OBS 2014.4 for related findings.
General concern about the number of invasive plant species in Indiana forests	Duly noted. The audit team saw numerous management strategies and extensive use of cost share funds to control invasive species across group member properties.

4. Results of The Evaluation

Table 4.1 below, contains the evaluation team's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

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

Principle / Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard
P1: FSC Commitment and Legal Compliance	All foresters interviewed were extremely knowledgeable regarding the laws and requirements for participation in the Classified Forests & Wildlands Program.	None noted
P2: Tenure & Use Rights & Responsibilities	None noted	None noted
P3: Indigenous Peoples' Rights	None noted	None noted
P4: Community Relations & Workers' Rights	The certification program within the Classified Forests & Wildlands Program is an excellent means of improving community relations and engaging the community on resource management. Foresters were found to be active community members and landowners interviewed spoke highly of their local forester and the assistance they have received through the program.	None noted
P5: Benefits from the Forest	DoF foresters work with individual landowners to ensure their rights	None noted

	and objectives are respected, while helping the landowner get the most benefit from their forestland.	
P6: Environmental Impact	None noted	Minor NC 2014.1 – 6.1.b Minor NC 2014.3 - 6.3.f OBS 2014.4 - 6.5.c Major NC 2014.5 - 6.6.a
P7: Management Plan	Given the diversity of management objectives, the individual management plans prepared for group participants are impressive.	OBS 2014.6 - 7.1.a.viii OBS 2014.7 - 7.1.b OBS 2014.8 - 7.3.a
P8: Monitoring & Assessment	None noted	OBS 2014.9 - 8.2.a.1 Minor NC 2014.10 - 8.5.a
P9: High Conservation Value Forests	None noted	Minor NC 2014.11 - 9.1.a
Chain of custody	Despite some gaps in chain of custody administration, the training has been adequate and reached most contractors, who know to ask for the certificate numbers to pass on the claim.	Minor NC 2014.12 – CoC 2.2 Major NC 2014.13 – CoC 3.2 Major NC 2014.14 – CoC 4.1, 4.2
Group Management	The certified lands within the Classified Forests & Wildlands Program represent an extremely complicated group to maintain. The DoF is doing an exemplary job organizing such a large group of landowners with diverse interests, and is improving its group management structures and procedures every year.	Minor NC 2014.15 – Group 1.4 OBS 2014.16 – Group 3.1.v

4.2 Process of Determining Conformance

4.2.1 Structure of Standard and Degrees of Nonconformance

FSC-accredited forest stewardship standards consist of a three-level hierarchy: principle, the criteria that correspond to that principle, and the performance indicators that elaborate each criterion. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each nonconformance must be evaluated to determine whether it constitutes a major or minor nonconformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in nonconformance. The team therefore must use their collective judgment to assess each criterion and determine if the FME is in conformance. If the FME is determined to be in

nonconformance at the criterion level, then at least one of the applicable indicators must be in major nonconformance.

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

4.2.1 Interpretations of Major CARs, Minor CARs and Observations

Major CARs: Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME’s response to the CAR within the stipulated time frame.

Minor CARs: These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

Observations: These are subject areas where the audit team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

4.2.2 Major Nonconformances

<input type="checkbox"/>	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input checked="" type="checkbox"/>	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.

4.2.3 Existing Corrective Action Requests and Observations

Finding Number: 2013.01	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	6.3.f.
<p>Non Conformity: Indicator 6.3.f requires that the forest manager “maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <p>a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and</p> <p>b) vertical and horizontal complexity.</p> <p>c) Trees selected for retention are generally representative of the dominant species found on the site. “</p> <p>For the following reasons DoF is not in conformance with this requirement:</p> <ol style="list-style-type: none"> 1. DoF lacks a legacy tree retention policy for the CFP. 2. Numerous properties inspected in 2013 audit had large diameter wildlife trees designated with an “x”. This cull tree designation gives the logger the discretion to harvest the tree if some or all of the tree can be utilized. Many times there is little economic value in these trees and they have significant ecological value as wildlife trees. 3. Wildlife section of most Classified Forest management plans fails to mention den trees or legacy trees. 4. DoF lacks any numeric target or even general guidelines for what is a sufficient number of den/cavity trees per acre to meet wildlife habitat objectives of landowner and FSC 6.3.f requirements. 	
Corrective Action Request	Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.
FME response (including any evidence submitted)	<p>The Division of Forestry added the following to the ICFCG Umbrella plan. The 2015 Classified Forest & Wildlands Newsletter – Certification Section will highlight Legacy & Wildlife Trees.</p> <p>Legacy and Wildlife Trees</p> <p>In order to keep and develop wildlife habitat and stand structures that would develop from natural forest processes, the following types of trees and structures should be retained:</p> <ul style="list-style-type: none"> • Legacy trees: Individual old trees that function as a refuge or provides important structural habitat values. “Wolf” trees at home sites, along abandoned road beds, etc are recommended for retention. • Large live trees: The goal is retain at least 3 live trees greater than 19 inches dbh per acre. • Snags & Culls: Standing snags and culls not salvaged should be left standing, except where they pose a human safety hazard. Cull trees may

	<p>be deadened (girdle, herbicide) when necessary to achieve a silvicultural goal, but should be left standing. A tree with less than 10% live canopy should be considered a snag. Snags that have no remaining bark or no visible cracks, splits, or hollows may be felled as well as any snags leaning more than 45degrees from vertical.</p> <p>Legacy trees should be generally representative of the species mixture on the site.</p>
SCS review	<p>SCS audit team verified that Umbrella Plan was revised to include procedures for retaining Wildlife and Legacy trees and DoF foresters were trained in June at the section meeting.</p> <p>In addition, the audit team found general conformance with 6.3.f during audit field visits. Interviews with DoF staff suggested a general awareness of the new Wildlife and Legacy retention procedures. However, there is a need to continue to reinforce it to ensure consistent implementation- see CAR 2014.xx. The audit team also notes a possible interpretation error in the part of the procedure related to protecting cull trees that have good wildlife values. The procedure states “culls not salvaged should be left standing”, thus allowing loggers to possibly salvage all cull trees. A clarification of the cull tree marking/retention policy along with ensuring professional foresters and loggers (who do all of the marking) are trained is the basis for CAR 2014.3.</p>
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2013.02	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	6.3.g.1
<p>Background: Indicator 6.3.g.1 requires that “when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation.” Even-aged harvests are very rare on Classified Forests. During 2013 audit, we did not observe any even-aged harvests that lacked retention. However, DoF lacks any explicit policy requiring green tree retention during even-aged harvests.</p>	
Observation	DoF should develop and implement a green tree retention policy to help ensure conformance with FSC requirement 6.3.g.1.
FME response (including any evidence submitted)	<p>The Division of Forestry has established a green tree retention policy for the ICFCG:</p> <p><i>In regeneration or salvage openings 20 acres or greater, islands of sound mature trees, understory trees, shrubs, live cavity trees, and snags will be left in reserve.</i></p>

	<p><i>These “green tree retention” areas should total at least 5% of the regeneration opening area, configured as an individual island or several islands, each no smaller than 1/5 acre. For example, a 20 acres shelterwood would require either one 1 acres island or several islands greater than 1/5 acres that total 1 acre. The residual structure is retained throughout the entire rotation of the even-age stand.</i></p> <p><i>In the case of pine plantation conversion to a hardwood stand, green tree retention of pine is not required or recommended.</i></p>
SCS review	The audit team verified that the green tree retention procedure is now included in the Umbrella Plan and that DoF staff are trained and aware of the procedure.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2013.03	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	7.1.a
<p>Background: Indicator 7.1.a requires that the written management plan for the property or properties under certification include “quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information.”</p> <p>Only some property level plans have a quantitative description and thus there is an opportunity to improve quantitative data specific to each property. Additionally, for one recent harvest that was inspected in 2013 harvest volume by species was not in the property file, rather only the total volume removed was available.</p> <p>This is an observation as opposed to a CAR because at the group level, the Division of Forestry produced a “Volume and Growth of Classified Forest and Wildlands Program Lands Memo (October 8, 2008)” that generally addresses sustained harvest rates for all Classified Forest & Wildlands Program properties. Furthermore, DoF recently completed CFI monitoring for the CFP.</p>	
Observation	DoF should implement procedures to collect quantitative data during property re-inspection and plan writing. In the absence of gathering quantitative data, DoF should consider providing a range of growth estimates based on State-wide CFI plots and qualitative data that is collected for each property. Additionally, DoF should ensure that harvest volume by species is retained in each property file.
FME response <i>(including any evidence submitted)</i>	Landowner usually list timber production and harvesting as a low priority. Therefore, the district foresters don’t emphasize inventories or other quantitative data collection unless the landowner expresses an interest in timber

	<p>management.</p> <p>We did initiate a system wide continuous forest inventory (CFI) that will allow us to estimate growths and removals on a Classified Forest & Wildlands wide basis. We are just wrapping up the 3rd year of CFI. Once this data is analyzed, we will have trend data specific to classified forests.</p> <p>The table below is based on FIA data and measures growth and removal of all trees 5 inch dbh or greater in cubic feet. The data is listed by FIA Regions. The data show that we are growing more volume than we are removing.</p> <table border="1" data-bbox="454 619 1153 888"> <thead> <tr> <th>UNIT</th> <th>GROWTH</th> <th>REMOVAL</th> <th>NET</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>69,293,486</td> <td>7,404,432</td> <td>61,889,054</td> </tr> <tr> <td>Lower</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Wabash</td> <td>43,588,661</td> <td>23,710,321</td> <td>19,878,340</td> </tr> <tr> <td>Upland Flats</td> <td>30,115,742</td> <td>2,368,187</td> <td>27,747,555</td> </tr> <tr> <td><u>Knobs</u></td> <td><u>59,260,938</u></td> <td><u>28,947,145</u></td> <td><u>30,313,793</u></td> </tr> <tr> <td>Statewide</td> <td>202,258,827</td> <td>62,430,085</td> <td>139,828,742</td> </tr> </tbody> </table>	UNIT	GROWTH	REMOVAL	NET	North	69,293,486	7,404,432	61,889,054	Lower				Wabash	43,588,661	23,710,321	19,878,340	Upland Flats	30,115,742	2,368,187	27,747,555	<u>Knobs</u>	<u>59,260,938</u>	<u>28,947,145</u>	<u>30,313,793</u>	Statewide	202,258,827	62,430,085	139,828,742
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SCS review	<p>The audit team confirmed that the CFI system is still being implemented. The interim approach of growth estimates based on FIA data is sufficient in the meantime. Give current staffing limitations and the fact that a large percentage of CF members are not interested in timber harvests, DoF has decided to continue, in most cases, to include only qualitative inventory information in plans. The requirement to ensure that harvest volumes by species is tracked for each CF property has been included in OBS 2014.9.</p>																												
Status of CAR:	<p><input checked="" type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> <i>Other decision (refer to description above)</i></p>																												

Finding Number: 2013.04	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	Group Management (FSC-STD-30-005), Requirement 3.2
Background: Per Group Management Requirement 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." DoF's Umbrella Plan covers issuing corrective actions and mandatory withdrawal for repeat and major non-conformances. However, DoF does not offer any specifics about what types of activities trigger mandatory withdrawal (e.g., repeat occurrences of not notifying DF prior	

to harvest, substantial deviation from management plan).		
Observation	DoF should provide written guidance and/or training on the types of issues (e.g., repeat occurrences of not notifying DF prior to harvest, substantial deviation from management plan) that trigger mandatory withdrawal from the program.	
FME response <i>(including any evidence submitted)</i>	The Division of Forestry added the following guidance regarding non-conformances by group members to the ICFCG Umbrella Plan:	
	Non Conformance Guidelines	
	Non Conformance	Response
	Timber harvest – failure to notify district forester prior to harvest	First nonconformance: educational corrective action request letter; Second nonconformance: removal from certified group
	Banned chemical use	First (second) nonconformance: educational corrective action request letter (based on reporting time frames a landowner could do a second application before receiving CAR. Second (third) nonconformance: removal from certified group
	BMP issue	On harvest field visit sheet or in letter request correction with 30-180 day timeframe. Time frame depends on severity of problem and time of year. BMP issues that will have a long term impact and the group member is unwilling or unable to correct will result in removal from the certified group and potentially the Classified Forest & Wildlands Program.
Forest Conversion	If forest conversion exceed FSC limit, corrective action request letter requesting the excess converted acres be restored to forest. Conversions where the group member cannot or will not restore back to forest will result in removal from the certified group and potentially the Classified Forest & Wildlands Program if exceed program limits.	
Failure to follow stewardship plan	Gross disregard of stewardship plan may result in removal from the certified group and potentially the Classified Forest & Wildlands Program.	
SCS review	Audit team confirmed that written guidance is now included in Umbrella Plan.	
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)	

4.2.4 New Corrective Action Requests and Observations

Finding Number: 2014.1			
Select one:	<input type="checkbox"/> Major CAR	<input checked="" type="checkbox"/> Minor CAR	<input type="checkbox"/> Observation
FMU CAR/OBS issued to (when more than one FMU):			

Deadline	<input type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard, 6.1.b.
Non-Conformity (or Background/ Justification in the case of Observations): In a significant number of instances (for some districts approximately 50% of the time), DNR is not being notified until after harvests are completed. As a result, pre-harvest inspections required by the Group's forest management and COC procedures that are intended to identify impacts and appropriate BMP measures, precautions for RTE species, affirmation of eligible FSC claims and codes, etc. are not occurring.	
Corrective Action Request (or Observation): FME shall develop and implement procedures to ensure that prior to commencing timber harvests that will be marketed as FSC certified (regardless of whether the timber is ultimately sold with an FSC claim), on-site inspections occur to assess the potential short and long-term impacts of planned management activities.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.3	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard Indicator 6.3.f.
Non-Conformity (or Background/ Justification in the case of Observations): DoF has developed a new procedure to facilitate conformance with Indicator 6.3.f. However, the forest workers involved in tree marking have not been made aware of the new procedure. Furthermore, the audit team notes a possible interpretation error in the part of the procedure related to protecting cull trees that have good wildlife values. The procedure states "culls not salvaged should be left standing," thus allowing loggers to possibly salvage all cull trees. The guidance as written appears to be directed at TSI crews rather than directing the guidance at the initial timber marker who has the opportunity to change a cull designation of "x" (signifying optional felling) to a "W" or "TSI" that removes a loggers discretion to fell all cull trees.	

Corrective Action Request (or Observation): DoF must clarify the cull tree marking procedure and ensure that professional foresters and loggers (who do all of the marking of CF) are trained in the new Wildlife and Legacy Tree procedure.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2014.4	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US Forest Management Standard 6.5.c
Non-Conformity (or Background/ Justification in the case of Observations): Indicator 6.5.c requires that “management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance.” The DoF rutting guidelines designed to protect soil resources allow for continued hauling and skidding as long as the ruts can be smoothed so that they do not exceed 18” in depth. This guideline may not be effective at preventing root damage, changes in hydrology, and compaction that often occur when ruts are being made. Smoothing of ruts does not alleviate the root damage, compaction, and changes to hydrology associated with rutting.	
Corrective Action Request (or Observation): DoF should consider implementing a revised rutting guideline that better protects soil and water resources.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2014.5	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input checked="" type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard Indicator 6.6.a
Non-Conformity (or <i>Background/ Justification in the case of Observations</i>):	
The annual report from landowners indicated that some in the certified group used prohibited chemicals within the last year on their individual properties (2,4-D, 2-ethylhexyl ester and dicamba).	
Corrective Action Request (or <i>Observation</i>):	
DoF shall take actions to ensure that no chemicals on the FSC Highly Hazardous Pesticide list are used by any certified group members without a valid derogation.	

FME response
(including any
evidence
submitted)

The Division of Forestry actions to prevent use of FSC Highly Hazardous Pesticides by Indiana:

- Address pesticide use in the group umbrella plan:

Pesticide Use

Pesticide use is one tool available in IPM. In general non-chemical pest management which provides desired control and is cost effective is preferred.

High hazardous pesticides, banned by FSC, are not to be used on ICFCG. The use of a banned pesticide will result in the issuance of a corrective action request and possible removal from the certified group. More information on banned pesticides is available from district foresters and on the Division of Forestry’s website (<http://www.in.gov/dnr/forestry/>).

All pesticides must be applied according to the label. Group members must keep records of pesticides applied to their certified forests. Landowner records should include the pesticide used, date, the reason for application, location of application, amount applied, and name of applicator. The group member must report pesticide use on their Classified Forest & Wildlands Annual Report.

The group manager will review pesticides reported on the annual reports and issue corrective actions as necessary.

- Group Member Education
In the Classified Forest & Wildlands Newsletter (annual) the issue of chemical use is discussed. See the attached example article. The spring 2015 newsletter will contain a reminder on chemical use. The newsletter goes to all group members

For individuals who report using a banned chemical on their annual report, they are contacted by the district forester to determine if the chemical was used on their certified land. If the landowner did use the chemical and it is their first use, the district forester issues educational CAR (see attached samples). Repeat use of banned chemical will result in removal of the landowner from the certified group.

- Industry Education: The Division of Forestry also works with members of the forestry industry to help prevent use of banned chemical on group lands. The State Forester attends and talks at industry meetings. We are hosting certification training for professional foresters at the end of March 2015. Pesticide use will be covered at that training.

May 18th update:

District Forester Training, Feb 26, 2015

Pesticide related slides from Training PowerPoint (FSC Highly Hazardous Chemicals Standard Updated. pptx)

<p>SCS review</p>	<p>SCS reviewed a number of documents pertinent to the points above. An agenda for the March 24th <u>CFW Industry Training Meeting</u> was reviewed and found to include information on pesticide use. The PowerPoint slides for the training were also reviewed and found to contain correct instructions and examples pertaining to the new HHP list. SCS also reviewed the draft text pertaining to pesticide use for the next issue of the Green Certification Update, the newsletter for the Classified Forest & Wildlands Program, which is sent to all participating landowners. The text on pesticide use is accurate.</p> <p>Given that the information contained within all these draft documents is accurate and up to date, but the newsletter has not yet been sent out, and the training not yet given, this Major CAR is extended for one three month period, to be closed as soon as proof that the full corrective actions have been undertaken.</p> <p>May 20th update: The above mentioned documents have been reviewed and satisfy the requirements of this CAR.</p> <p>The training slides include mention of the new HHP list and how to check if a chemical is prohibited.</p> <p>SCS reviewed the eNewsletter for Classified Forest participants, which includes a link to the recent Green Certification Update for certified members. A review of the update verifies that it includes an excellent description of the new HHP list and instructions on how to ensure members are not using prohibited chemicals.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 2014.6	
<p>Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation</p>	
<p>FMU CAR/OBS issued to (when more than one FMU):</p>	
Deadline	<p><input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none</p>
FSC Indicator:	FSC-US Forest Management Standard 7.1.a viii
<p>Non-Conformity (or Background/ Justification in the case of Observations): Although there are notable exceptions, most DNR District Foresters do not stratify land cover types into separate stands in forestry plans or maps, nor do they collect any stand-level inventory data. Auditors also observed that few landowner files include maps that identify timber harvests or other active management areas such as TSI operations. Better forest management decisions would likely result from more stand-specific information in plans and maps, whether it be qualitative or measured/numeric.</p>	
<p>Corrective Action Request (or Observation):</p>	

FME should encourage foresters to provide more stand-level cover type information in plans and maps. Harvests and other treatments should be identified on maps. Stand-level variables should be measured rather than relying so heavily on intuition or perceptions.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2014.7	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC US Forest Management Standard FF Indicator 7.1.b.
Non-Conformity <i>(or Background/ Justification in the case of Observations):</i> Management actions recommended in the management plan are sometimes not executed by the landowner. For example, some district foresters often recommend using regeneration openings to encourage oak regeneration. However, very few landowners will implement regeneration openings on their forest. Lack of follow through on TSI recommendations is another example of management plan recommendations that are sometimes not implemented.	
Corrective Action Request <i>(or Observation):</i> DoF should consider taking additional actions to help ensure management recommendations are implemented.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2014.8	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	

Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC US Forest Management Standard 7.3.a.
Non-Conformity (or Background/ Justification in the case of Observations):	
There is often very little interaction between District Foresters, loggers and consulting foresters regarding harvests or management planning on any given property. Other forest workers are rarely aware of the stewardship plans or the recommendations therein. This lack of coordination between all those working in the forest results in incomplete implementation of individual stewardship plans.	
Corrective Action Request (or Observation):	
DoF should consider exploring ways to improve the coordination between all forest workers, to ensure that all workers are qualified to properly implement the management plan and are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.9	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC US Forest Management Standard 8.2.a.1
Non-Conformity (or Background/ Justification in the case of Observations):	
DoF collects inventory data at the state level through the relatively newly begun system of CFI plots. These plots provide updated coarse grain inventory information that should allow trends to be tracked over time. However, very little property level inventory data is being collected – and on the smallest properties of only 10 ac, this level of data collection may not be useful or feasible. Inventory data is being collected however on larger properties, sometimes by the landowner, or with the assistance of a consulting forester. On larger properties, or those interested in conducting regular harvests, this inventory data could prove useful in management planning.	

Corrective Action Request (or Observation): DoF should consider determining criteria for properties on which inventory data will be collected, including at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.10	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard Indicator 8.5.a
Non-Conformity (or Background/ Justification in the case of Observations): Monitoring data related to “Volume and Growth of Classified Forest and Wildland Program Lands” was published on the Internet by Indiana Division of Forestry on October 8, 2008, but it hasn’t been updated since. The most recent on-line program summary is dated 2008. BMP monitoring results have not been updated since 2011. No HCVF-related monitoring summaries were found for Classified Forests.	
Corrective Action Request (or Observation): FME shall provide updated, publically available monitoring results for the indicators in Criterion 8.2.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.11	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard Indicator 9.1.a
Non-Conformity (or Background/ Justification in the case of Observations): In preparation for past audits, DoF has conducted components of their HCVF evaluation which has resulted in a general list of the HCVF categories determined to be present, a combined acreage of these areas, and a list of community types that could be designated as HCVF if found in the field. However, a full HCVF assessment has not yet been completed as described in Appendix F.	
Corrective Action Request (or Observation): DoF shall identify and map the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.12	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS FSC Chain of Custody Indicators for Forest Management Enterprises 2.2
Non-Conformity (or Background/ Justification in the case of Observations): Each group member must report the volume of timber sold on an annual report. Of 249 tracts that were reported as having a timber harvest in 2013, only 81 tracts (33%) had records of board foot volume harvested. Numerous site visits indicate that landowners often do not receive or report quantity of products sold. Interviews indicated that many loggers and some consulting foresters do not always provide species and volume information.	
Corrective Action Request (or Observation):	

FME shall develop and implement procedures to define the forest gate and a material accounting system that includes the volume of FSC-certified products sold.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.13	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input checked="" type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS FSC Chain of Custody Indicators for Forest Management Enterprises 3.2
Non-Conformity (or Background/ Justification in the case of Observations):	
<p>The auditor ran a Google search to look for uses of the FSC trademarks (including the letters FSC and the words Forest Stewardship Council, as well as the graphic logos). The search found 230 web pages that use "Forest Stewardship Council". Google found 1,380 pages in the IN.GOV domain that use "FSC", but not all of those hits are in regard to forest certification.</p> <p>The Certification Coordinator provided one 2011 SCS authorization (email) for an Indiana Tree Project web page, but the graphic logo used on the page was not the one approved by SCS and is non-conforming. The Coordinator had no other trademark use authorizations from SCS.</p> <p>The auditor sampled some of the other web pages using FSC trademarks but was unable to find any with an FSC license code or other elements of an FSC promotional panel. Additional potentially nonconforming trademark uses were observed.</p>	
Corrective Action Request (or Observation):	
The FME shall request authorization from SCS to use the FSC trademarks for promotional use, including the public Internet site and publications.	
FME response <i>(including any evidence submitted)</i>	The Division of Forestry has set up new accounts (Indiana Classified Certified Group and DoF State Forest) in the SCS logo website and has submitted and received approvals for logo use on the Division of Forestry webpage and documents (see attached approval lists and screenshots of websites). The CoC group has also received logo approvals and updated their section of the website (see screenshot). The DoF is working with the Natural Resources Foundation to get the Indiana Tree Project website updated to include the approved logo. Logo approval will be an ongoing process for the website and document development.
SCS review	SCS has reviewed the evidence provided by the FME, including evidence of

	correspondence and approval for logo usage.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2014.14	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input checked="" type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS FSC Chain of Custody Indicators for Forest Management Enterprises 4.1, 4.2
Non-Conformity (or Background/ Justification in the case of Observations): When landowners sell timber on shares, loggers and/or consultants are effectively serving as outsourcing contractors that cut and broker the timber and transport logs to concentration yards or to certified mills. There is no evidence that group member contracts with timber producers and/or consultants include provisions that address requirements of a COC control system.	
Corrective Action Request (or Observation): The FME shall identify loggers and consultants that agree to provide outsourcing services that are consistent with the group’s FSC COC requirements. Such a directory of loggers and consultants signing an FSC conformance agreement shall be provided to group members. If group members elect to work with an outsourcing contractor not listed in the directory, then the individual landowner shall be responsible for demonstrating that their agreement with the service provider includes all applicable FSC COC requirements.	
FME response (including any evidence submitted)	<p>To address this issue, the Division of Forestry has added the following language to the ICFCG Umbrella Plan:</p> <p>Timber from ICFCG lands sold on shares cannot be passed down the chain of custody unless the shares sale logger/consultant (outsourcing contractor) is FSC Chain of Custody certified.</p> <p>To make the new policy known, the following steps will be taken:</p> <ul style="list-style-type: none"> • A notice will be place in the Timber Buyer’s Bulletin starting in March and running for several months. The Timber Buyers Bulletin goes to all timber buyers licensed in Indiana. • A notice will be included in the Classified Forest & Wildlands newsletter (spring 2015). • The information will be shared at the certification training for professional foresters in March 2015. <p>May 18th update: Classified Forest & Wildlands Newsletter (ForCFWNewsletter2015_print.pdf): Hard copies mailed to landowners on March 24, 2015. See page 7 Green Certification Update.</p>

	<p>Industry Green Certification Training, March 24th, 31 attendees Shares sale related slide from Training PowerPoint (Shares Sales on ICFCG. pptx) Training Attendee List (Certified Industry Preharvest Training List.xlsx)</p> <p>Licensed Timber Buyer Bulletin (LTB) Announcement: The LTB is sent monthly to all licensed timber buyer in Indiana. An announcement regarding shared sales on certified Classified Forest has been included since March and will be continued to be included through August 2015. (LTB Shares Sales Blurb. pdf)</p>
SCS review	<p>To address this issue, SCS reviewed the notice to be placed in the Timber Buyer’s Bulletin, the same notice to be placed in the program newsletter, the slides mentioning the policy change and explaining it for the certification training, and the new language in the Umbrella Plan.</p> <p>Given that the newsletters haven’t gone out yet and the training has not yet taken place, this Major CAR is extended for one three month period, to be closed when evidence is submitted that prove the above actions have taken place.</p> <p>May 20th update: SCS has reviewed the above listed documents sent on May 18th and finds they provide verification that the actions intended to address the Major CAR have been completed.</p>
Status of CAR:	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 2014.15	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC Standard for Group Entities, 1.4
Non-Conformity (or Background/ Justification in the case of Observations): Conversations with District Foresters during the audit indicated that although FSC topics are covered at annual meetings and training is occasionally conducted to improve staff understanding of FSC concepts, additional training is likely needed for complicated topics on a semi-regular basis. Topics that auditors felt foresters could improve their understanding of included RSAs, HCVF, old growth and Chain of Custody.	
Corrective Action Request (or Observation): DoF shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards.	

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

Finding Number: 2014.16	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC Standard for Group Entities, 3.1.v
Non-Conformity (or Background/ Justification in the case of Observations): The INFRMS database system has a method whereby District Foresters can add violations from a drop down list for particular properties when CARs are noted. However, knowledge and use of this component of CAR tracking is inconsistent among District Foresters and not all CARs are going into the database. Follow up on violations is also not consistent. Thus, while DoF has a process for issuing internal CARs, this process is inconsistently applied and followed through on.	
Corrective Action Request (or Observation): DoF should consider clarifying or providing additional training to District Foresters on the process expected to issue and fulfill any corrective action requests issued internally, including timelines and implications if any of the corrective actions are not complied with.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

5. Certification Decision

Certification Recommendation	
FME be awarded FSC certification as a “Well-Managed Forest” subject to the minor corrective action requests stated in Section 4.2.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols. If certification is	

recommended, the FME has satisfactorily demonstrated the following without exception:	
FME has addressed any Major CAR(s) assigned during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
FME has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this report) are met over the forest area covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>Comments:</p> <p>The audit team would like to commend the Indiana Classified Group for its excellent management in the face of budget constraints and reduced staffing. A mega group in the US is only being done by two entities in the United States and the DoF group management shows a strong commitment to the FSC that is hard to find elsewhere. They have gained considerable efficiency through use of technology, such as iPads and the INFRMS database. Overall they are clearly supporting responsible forestry on a class of lands that have very high risk for unsustainable forestry and conversion to other uses, while providing numerous jobs in small communities, through the mills, consulting foresters, loggers, etc. Finally, in visiting over 50 properties, auditors interviewed numerous very satisfied landowners who spoke highly of their District Foresters.</p>	

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – Current and Projected Annual Harvest for Main Commercial Species

In the 2014 Annual Report, landowners reported 422 tracts had a timber harvest. Estimated harvested acreage is 17,600 acres.

Appendix 2 – List of FMUs Selected for Evaluation

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

SCS staff establishes the design and level of sampling prior to each group or multiple FMU evaluation according to FSC-STD-20-007. A list of the FMUs sampled is presented in the audit itinerary. The tract number is given for each property visited, which allows the property to be located within the DoF INFRMS database. SCS samples the Indiana Classified group as a set of SLIMF RMUs, with each district representing one RMU with numerous SLIMF group members. Prior to the audit, a spreadsheet of all the member properties listed by district was randomly sampled, and 4 properties with recent timber harvests were selected per district for field visits. One additional property was selected in each district to assess other activities, such as invasive weed control, TSI or planting. Once in the field, each audit team considered ease of access and stakeholder issues on a property by property basis and had access to the next lowest random number to select additional properties as needed. All properties are natural forest and all are SLIMF.

Appendix 3 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Brenda Huter	Stewardship Coordinator		Opening meeting, field audit
John Seifert	State Forester		Opening meeting, field audit
Zack Smith	Forest Programs Coordinator		Opening meeting, field audit
Phil Wagner	Ass't State Forester, Coop. Forest Mgmt.		Opening meeting, field audit
Donna Rogler	Project Learning Tree Coordinator		Opening meeting, field audit
Jeremiah Lemmons	District Forester		Field audit
Allen Royer	District Forester		Field audit

Amy Spaulding	Ass't District Forester		Field audit
Ralph Unversaw	District Forester		Field audit
Nathan Fishburn	Ass't District Forester		Field audit
Jayson Waterman	District Forester		Field audit
Brad Rody	District Forester		Field audit
Tim Ezinger	District Forester		Field audit
Steve Winicker	District Forester		Field audit
James Potthoff	District Forester		Field audit
Darrell Breedlove	District Forester		Field audit
Rob McGriff	District Forester		Field audit
Ben McKinney	District Forester		Field audit

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Jeff Swackhamer	Consulting Forester		Phone	
Steve Aker	Group Member		Field	
Jack Gross	Group Member		Field	
Sackrider Farms	Group Member		Field	
Rusty Phillips	Timber buyer for Richard Booe sawmill		Field	
Dean Baker	Group Member		Field Interview	
Sarah Solano	Group Member		Field Interview	
Dennis Showers	Group Member		Field Interview	
Brenda Krom	Group Member		Field Interview	
Jeff Steinkraus	Consulting Forester		Field Interview	

Appendix 4 – Additional Evaluation Techniques Employed

No additional evaluation techniques were employed during this evaluation.

Appendix 5 – Certification Standard Conformance Table

C= Conformance with Criterion or Indicator

C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances

NC= Nonconformance with Criterion or Indicator

NA= Not Applicable

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles		
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.		
1.1 Forest management shall respect all national and local laws and administrative requirements.	C	

<p>1.1.a Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.</p>	<p>C</p>	<p>The Indiana Classified Forest Certified Group (Indiana Department of Natural Resources – Division of Forestry) exhibits strong conformance with laws, rules, and regulations. There are no enforcement actions against the agency related to compliance with applicable federal, state, or local forestry and related environmental laws and regulations.</p>
<p>1.1.b To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	<p>C</p>	<p>Indiana DNR has an extensive set of internal administrative policies that assure compliance with laws. Training is provided to employees to make them aware of requirements. Notices and updates to policies are regularly distributed. Department legal staff advises the agency.</p> <p>Interviews with staff indicate that the Indiana State Code is readily available via the Internet.</p> <p>Indiana Classified Forest Certified Group Umbrella Management Plan and sample timber sale contract language include sections on compliance with laws and regulations.</p>
<p>1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</p>	<p>C</p>	
<p>1.2.a The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.</p> <p>FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Group member payment of annual property taxes is the only fee required. As explained by DNR, the fee for Classified Forests is based on an assessed value of only \$1 per acre, with most participants paying only a minimum of \$5 per year. Non-payment has not been an issue.</p>
<p>1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</p>	<p>C</p>	
<p>1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.</p> <p>FF Indicator: Low risk of negative social or environmental impact</p>	<p>C</p>	<p>In the State of Indiana, there is one forest species covered under CITES, <i>Panax quinquefolius</i> or American ginseng. In the United States, each state is responsible for regulating the commercial sale of this CITES-listed species. DNR provides a flyer on ginseng regulations. Commercial harvest of ginseng is regulated through the Indiana Administrative Code, Title 312, Article 19 Research, Collection, Quotas, and</p>

		Sales of Plants, and Indiana Code IC 14-31-3, Chapter 3. Ginseng. Commercial harvesters and sellers must obtain permits and licenses through the State of Indiana and adhere to harvesting practices intended to maintain the ginseng resource.
1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	C	The audit team found no evidence of any conflicts between Indiana laws and the FSC-US Forest Management Standard.
1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the Forest Management Unit (FMU).	C	During 2014 audit observed CFP properties to be well gated and signed. CFP regulations require posting the corners of enrolled properties. During 5-year re-inspections, DF's take note of unauthorized activities and discuss ways to address the problem.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	Most of the properties are posted, gated, and contain CFP signs. In some instances owners work with Conservation Officers. Some landowners use hidden cameras to monitor activity. District Foresters can assist group members with guidance if timber theft or illegal activities are noted.
1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	C	
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	C	The Classified Forest Umbrella plan includes a requirement that "Landowners are the group members and are responsible for implementing the FSC certification standards and policies on their classified forests."
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing	C	For participating landowners, the group program's rules provide that "All of a landowner's eligible parcels will be included in the group certification."

<p>FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.</p>		
<p>FF Indicator 1.6.c The forest owner, manager or group manager notifies the Certifying Body of significant changes in ownership, the certified land base and/or significant changes in management planning prior to the next scheduled annual audit, or within one year of such change, whichever comes first.</p>	<p>C</p>	<p>ICF managers provided SCS with an updated group roster prior to the audit. All requested information related to the audit was provided.</p>
<p>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p>	<p>C</p>	
<p>2.1.a The forest owner or manager provides clear evidence of <i>long-term</i> rights to use and manage the FMU for the purposes described in the management plan.</p>	<p>C</p>	<p>ICF’s procedures provide a review of a group member’s ownership of the FMU. The group member application that addresses this information is maintained in each group member’s file at his or her assigned District office.</p>
<p>2.1.b The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.</p>	<p>C</p>	<p>Use and access rights held by others that impact the landowner’s management are recorded in the property deeds and leases. Classified Forest Lands are not otherwise open to the public.</p>
<p>2.1.c Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.</p>	<p>C</p>	<p>Auditors observed boundaries to be clearly marked on maps that are recorded as part of each Classified Forest enrollment. The maps (at present) must be made by a licensed surveyor, although the state is considering a rule change that would allow District Foresters to prepare the maps using digital parcel data from the counties. Boundaries of harvest areas were observed to be well marked in the field.</p>
<p>2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</p>	<p>C</p>	

<p><i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i></p>		
<p>2.2.a The forest owner or manager allows the exercise of tenure and use rights allowable by law or regulation.</p>	C	<p>The most common example of a right held by an outside party on classified land is a right of way for a power line or gas line. Such rights are noted in the property deeds and are allowed by the owners.</p>
<p>2.2.b In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.</p>	C	<p>Although this rarely is necessary, occasionally a landowner will have to notify the local power company of operations using heavy machinery, to ensure underground cable or gas lines are not damaged during harvests.</p>
<p>2.3. 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.</p>	C	
<p>2.3.a If disputes arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes. FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>No significant disputes were noted by any of the district foresters in attendance. Property disputes or use rights are generally the business of the private landowner and the DoF is not often involved.</p>
<p>2.3.b The forest owner or manager documents any significant disputes over tenure and use rights. FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>No evidence of non-compliance was noted during the field audit. No significant disputes were noted.</p>
<p>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p>		
<p>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</p>	C	
<p>3.1.a Tribal forest management planning and</p>	C	<p>The Potawatomi Indians have a few properties enrolled in</p>

<p>implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.</p>		<p>the CF&W program. The CF&W program does not have any restrictions that would prevent tribal representatives from carrying out forest management in accordance with tribal laws and customs.</p>
<p>3.1.b The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.</p>	<p>C</p>	<p>The Potawatomi Indians are the managers of the property and thus informed consent is not necessary.</p>
<p>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	<p>C</p>	
<p>3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.</p>	<p>C</p>	<p>The following is a list of Treaties enacted between the US government and Native American Tribes in Indiana. Details of the treaties are available online through the University of Oklahoma’s Indian Affairs: Laws and Treaties webpage (digital.library.okstate.edu/kappler/VOL2/toc.htm)</p> <p>August 1795 – Treaty of Greenville June 1803 – Treaty of Fort Wayne August 1804 – Treaty of Vincennes August 1805 – Treaty of Grouseland September 1809 – Treaty of Fort Wayne (“Harrison’s Purchase”) September 1817 – Treaty with the Wyandots October 1818 – Treaty of St. Mary’s August 1821 – Treaty of Chicago October 1826 – Treaty of Mississinewa September 1828 – Treaty of Carey Mission October 1832 – Treaty of Tippecanoe October 1834 – Treaty with the Miami November 1838 – Treaty with the Miami November 1840 – Treaty with the Miami (final secession of native land in Indiana)</p> <p>Although none of the original Native American Nations’ landholdings remain in Indiana, the Division of Forestry recognizes that this does not preclude the existence of legal or customary rights. No legal or customary rights that would impact ICFCG tracts have yet been identified. If in the future such rights are identified, the Division of Forestry will work with the specific Native American nation to insure the protection of those rights.</p>
<p>3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal</p>	<p>C</p>	<p>See 3.2.a</p>

resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.		
3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
FF Indicator 3.3.a The forest owner or manager maintains a list of sites of current or traditional cultural, archeological, ecological, economic or religious significance that have been identified by state conservation agencies and tribal governments on the FMU or that could be impacted by management activities.	NA	ICF, state agencies, and group members have not discovered any sites of traditional cultural, archeological, ecological, economic or religious significance. When a Native American site is discovered on a group member property, this criterion would become applicable.
3.3.b In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).	NA	ICF, state agencies, and group members have not discovered any sites of traditional cultural, archeological, ecological, economic or religious significance. In 2009 a letter was sent out notifying each group of the State’s intention to enter the Classified Forest & Wildlands Program into green certification and asking for comments on the Program or for areas of which they may have concerns due to cultural significance. No responses were received. If sites of special significance are identified in the future, the Division of Forestry will work with the specific Native American nation to development management recommendations appropriate for the level of detail provided.
3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NA	Traditional knowledge is not used by IDOF or group members.
3.4.a The forest owner or manager identifies whether <i>traditional knowledge</i> in forest management is being used.	NA	
3.4.b When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.	NA	
3.4.c The forest owner or manager respects the	NA	

confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.		
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	C	
4.1.a Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry. FF Indicator: Low risk of negative social or environmental impact.	C	Group member typically contact foresters or work directly with loggers or mills. ICF group members are thus at low risk of negative social or environmental impact.
4.1.b Forest work is offered in ways that create high quality job opportunities for employees. FF Indicator: Low risk of negative social or environmental impact.	C	Group member typically contact foresters or work directly with loggers or mills. ICF group members are thus at low risk of negative social or environmental impact. *Due to unfilled vacancies and continued growth of the program, the work load of many ICF employees is becoming difficult to complete within typical work hours. Given that ICF employees are at the low end of the pay scale nationwide and have very demanding workloads, the audit team is concerned about the DoF’s ability to retain the high quality staff necessary to implement the program.
4.1.c Forest workers are provided with fair wages. FF Indicator: Low risk of negative social or environmental impact.	C	Group member typically contact foresters or work directly with loggers or mills. ICF group members are thus at low risk of negative social or environmental impact.
4.1.d Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations. FF Indicator: Low risk of negative social or environmental impact.	C	Group member typically contact foresters or work directly with loggers or mills. ICF group members are thus at low risk of negative social or environmental impact.
FF Indicator 4.1.e: The forest owner or manager, as feasible, contributes to the local community.	C	ICF makes great contributions to the local economy by encouraging long-term timber management on non-industrial timberland. Benefits to the community include work opportunities for professional foresters, timber buyers, loggers, sawmills, and other wood product businesses. Some group members allow third parties to hunt or pass through their FMUs with permission.
4.1.f Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve	NA	

<p>public understanding of forests and forest management.</p> <p>FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)</p>		
<p>4.1.g The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.</p> <p>FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)</p>	NA	
<p>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	C	
<p>4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p> <p>FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>Most group members do not hire any employees for forest management work and are thus at low risk for this indicator.</p>
<p>4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</p>	C	<p>It was not possible to view active felling operations during the audit, however, a review of stumps from recently felled trees indicated safe felling techniques. DoF sample contract, as well contracts of professional foresters reviewed during the audit (e.g. confirmed for contract on Tract 43-004), included safety requirements.</p> <p>Other evidence of a safe work environment include:</p> <ul style="list-style-type: none"> • Tract 43-0207- daughter works alongside of elderly father in the woods for safety reasons. • CF member for Tract 71-0125 puts on periodic tree felling safety workshops on his property. Offers open invitation.
<p>4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p> <p>FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>Service providers that are hired include licensed timber buyers, loggers, and professional foresters. As is the case in most industries there is a wide range in the quality of service providers. The 2014 audit indicated that active harvests were typically done well. Audit team concludes low risk of social and environmental impact due to small size of properties. See also 7.3.a.</p>
<p>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p>	C	
<p>4.3.a Forest workers are free to associate with other workers for the purpose of advocating for</p>	C	<p>The right for workers to freely associate and unionize is clearly protected by U.S. and Indiana law. ILO Convention</p>

<p>their own employment interests. FF Indicator: Low risk of negative social or environmental impact.</p>		<p>87 has been ratified by U.S. Law. ILO Convention 98, however, does not apply to public sector workers. Under U.S. Federal Law and consistent with ILO 98, public sector employee rights are established by the U.S. Congress for federal employees and by state legislatures for state, county and local public sector employees. The right to organize is outlined in IC 22-7 (http://www.in.gov/legislative/ic/code/title22/ar7/; accessed October 12, 2011).</p>
<p>4.3.b The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management. FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>Group members do not hire workers, but rather contract forest management and harvesting to third parties. Disputes of this nature are therefore unlikely.</p>
<p>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</p>	C	
<p>FF Indicator 4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations.</p>	C	<p>Confirmed through review of:</p> <ul style="list-style-type: none"> - Umbrella plan (p.13) - Forest Management Plans for each property visited in 2014 - Indiana BMPs <p>At the individual property level social impacts of management are typically negligible. However, at the level of the entire group, social impacts are significant in terms of jobs created harvesting timber.</p>
<p>4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities. FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>Audit team determined low risk of negative social or environmental impact given the small size of the property.</p>
<p>4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	C	<p>No adverse effects of management observed, as confirmed through field visits and stakeholder interviews.</p>
<p>4.4.d For public forests, consultation shall include the following components: 1. Clearly defined and accessible methods for</p>	NA	<p>No public forests are part of the program.</p>

<p>public participation are provided in both long and short-term planning processes, including harvest plans and operational plans;</p> <p>2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management;</p> <p>3. An accessible and affordable appeals process to planning decisions is available.</p> <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>		
<p>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	C	
<p>4.5.a The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	C	<p>Group members demonstrate good understanding of property boundary location and negligent activities that could possibly arise with neighbors. During 2014 audit, no disputes or acts of negligence were uncovered. Stakeholders contacted did not indicate any acts of negligence.</p>
<p>4.5.b The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>	C	<p>All group members interviewed generally reported good working relationships with ICF staff and neighbors.</p> <p>ICF maintains documentation related to any grievances and disputes in District and Central offices. State of Indiana procedures and processes for addressing grievances/ disputes provide a known and accessible means for interested stakeholders to voice grievances and have them resolved.</p>
<p>4.5.c Fair compensation or reasonable mitigation is provided to local people, communities or adjacent</p>	C	<p>During 2014 audit, no examples of substantiated damage or loss of income were observed.</p>

landowners for substantiated damage or loss of income caused by the landowner or manager. FF Indicator: Low risk of negative social or environmental impact		
Principle #5: Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	C	
5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.	C	No landowner was found to be undertaking harvests that were not financially viable – most landowners were waiting until the market was favorable or trees had to be salvaged due to drought or disease damage. Salvage harvests, although not usually revenue generating, were generally undertaken with the future health of the stand in mind.
5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	C	Although landowners certainly try to time harvests to favorable timber markets, no harvests necessitated by financial factors were found to be in non-compliance with this standard. Very few landowners in the program were found to be heavily reliant on timber sales for income.
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.	C	
5.2.a Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service. FF Indicator: Low risk of negative social or environmental impact	C	The DoF provides group participants with a compendium of forestry professionals in their area (consulting foresters, loggers, timber buyers, etc) from which they may select individuals or companies to work with or to provide with bids for competitive rates.
5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.	C	Numerous examples were noted during the audit of individual landowners trying to optimize marketable resources off their forestland. One owner was processing tops for sale to a pellet factory, another was exploring options for sales of chip to co-gen plants or brick factories.
5.2.c On public lands where forest products are harvested and sold, some sales of forest products	NA	

or contracts are scaled or structured to allow small business to bid competitively.		
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	C	
5.3.a Management practices are employed to minimize the loss and/or waste of harvested forest products.	C	Given the limited nature and low intensity of most harvests on participants’ lands, little waste generated. If anything, most timber buyers or loggers and consulting foresters tend to mark trees that might best be left for wildlife, as they have defect that will significantly reduce their value. The emphasis in the field is certainly to minimize waste and extract anything that might give value.
5.3.b Harvest practices are managed to protect residual trees and other forest resources, including: <ul style="list-style-type: none"> soil compaction, <i>rutting</i> and erosion are minimized; residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; damage to NTFPs is minimized during management activities; and techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible. 	C	The light touch of most operations seen during the field audit indicated very little residual stand damage – many harvests could not be located on the ground while walking the property, as even a year later the damage was insignificant at the level of the ownership. BMPs are generally followed and should a violation occur, operators are required to repair them. A few instances of repairs were noted during the field audit, though this did not rise to the level of a finding. Adherence to BMPs is audited annually by the DoF.
5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	C	
5.4.a The forest owner or manager demonstrates knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.	C	District foresters were well aware of the effects of landowners’ participation in the program on the local economy. Many landowners keep their woodlands as insurance and are able to reap profit on a 15 – 20 year time horizon. Most landowners are using forestland products to supplement other income and the industry supports a large number of contract foresters, logging crews, machinery operators and local mills.
5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.	C	Many landowners are exploring innovative revenue sources from their forestland, including maple syrup production, carbon credits, hunting and fishing leases.
5.5. Forest management operations shall recognize, maintain, and, where appropriate,	C	

<p>enhance the value of forest services and resources such as watersheds and fisheries.</p>		
<p>5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.</p>	<p>C</p>	<p>The Classified Forest & Wildlands Program, at large, is designed to serve the public of Indiana by encouraging and making possible the conservation and management of the state’s forestlands, for the general benefit of the public. Although the lands in the program are all privately owned, the ability to retain forest cover at the state level arguably benefits all citizens and serves numerous public values, including watershed protection, wildlife habitat, recreation and tourism, clean air and water and carbon sequestration.</p>
<p>5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.</p>	<p>C</p>	<p>Many landowners express recreation and wildlife habitat as the main objective for managing their forestland and many make management decisions that will enhance those features of their property. Management for wildlife habitat in particular is popular and frequently expressed as the reason to maintain the forest resource.</p>
<p>5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	<p>C</p>	
<p>FF Indicator 5.6.a On family forests, a sustained yield harvest level analysis shall be completed. Data used in the analysis may include but is not limited to:</p> <ul style="list-style-type: none"> - regional growth data; - age-class and species distributions; - stocking rates required to meet management objectives; - ecological and legal constraints; - empirical growth and regeneration data; and, - validated forest productivity models. 	<p>C</p>	<p>The DoF has initiated a state wide continuous forest inventory (CFI) system that will permit estimates of growth and removal across the Classified Forest & Wildlands Program as a whole. The third year of data collection is just being concluded. Once this data is analyzed, there will be trend data specific to classified forests available. Given the low priority of timber harvesting expressed by most landowners in the classified program, and the anticipated time and expense, individual, property level analysis is not justified, nor useful at this time. The data provided at the state level should provide sufficient assurance of trends on land within the classified program.</p>
<p>FF Indicator 5.6.b. On family forests, harvest levels and rates do not exceed growth rates over successive harvests, contribute directly to achieving desired future conditions as defined in the forest management plans, and do not diminish the long term ecological integrity and productivity of the site.</p>	<p>C</p>	<p>In response to an observation during the 2013 audit, the DoF provided the table below, which is based on FIA data and measures growth and removal of all trees 5 inch dbh or greater in cubic feet. The data is listed by FIA Regions. The data shows that at the state level, there is far more growth than removal. This is likely particularly true on group participants’ properties, where the emphasis is rarely on removals and most properties are not undergoing regular harvests. Even on state lands, where removal is more regular, harvests are approaching 60% of growth.</p>

		UNIT	GROWTH	REMOVAL	NET
		North	69,293,486	7,404,432	61,889,054
		Lower Wabash	43,588,661	23,710,321	19,878,340
		Upland Flats	30,115,742	2,368,187	27,747,555
		<u>Knobs</u>	<u>59,260,938</u>	<u>28,947,145</u>	<u>30,313,793</u>
					139,828,74
		Statewide	202,258,827	62,430,085	2
5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	C	Almost every harvest visited during the field audit included removals for forest health reasons. High mortality of tulip poplar following the 2008 drought has led most landowners to salvage dying poplar where possible. Group participants are also removing mature ash in advance of the EAB. Removals of these two species alone is helping to reduce overstocked stands and salvage harvests improve forest health.			
5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	NA	No landowners were found to be collecting NTFPs at significant levels or for commercial operations.			
Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.					
6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	C				

<p>6.1.a Using the results of credible scientific analysis, best available information (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:</p> <ol style="list-style-type: none"> 1) Forest community types and development, size class and/or successional stages, and associated natural disturbance regimes; 2) Rare, Threatened and Endangered (RTE) species and rare ecological communities (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) Soil resources; and 6) Historic conditions on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions. 	<p>C</p>	<p>Items 1-6 are included in the management plan. Verified by reviewing management plans for properties visited during 2014 audit.</p>
<p>6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the best available information, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	<p>NC</p>	<p>Please see Minor CAR 2014.1</p>
<p>6.1.c Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or</p>	<p>C</p>	<p>Inspections of harvest operations during 2014 audit indicated that impacts are being avoided or minimized. A sample of ICF properties are inspected each year for BMP compliance.</p>

<p>enhance the long-term ecological viability of the forest.</p>		
<p>6.1.d On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	<p>NA</p>	<p>No public lands within the group.</p>
<p>6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>	<p>C</p>	
<p>FF Indicator 6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. A secondary review of the survey does not need to be included in the process. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	<p>C</p>	<p>Per DoF procedures, Natural Heritage database surveys are completed when preparing management plans and prior to a harvest. If the Natural Heritage database query indicates possible presence of forest dwelling RTE species, management occurs with the assumption that they are present. Auditors observed conformance with these requirements. Through interviews and file reviews, verified DF's are using appropriate resources to determine habitat needs of RTE species when Natural Heritage hits come up. Many of the Natural Heritage hits are wetland plants that are outside of timber harvest areas. District Foresters could benefit from refresher training on steps to take in the case of Natural Heritage hits of forest dwelling fauna (see CAR 2014.15).</p>
<p>6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with</p>	<p>C</p>	<p>Most Natural Heritage occurrences are within wetland or river corridors that are not impacted by timber harvests. However, when occurrences do occur within forested areas, appropriate actions are taken. Confirmed foresters in District 1, 2, 12, and 19 consult with DNR Wildlife when additional information is needed regarding management modification.</p>

relevant, independent experts as necessary to achieve the conservation goal of the Indicator.		
6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species’ recovery goals, as well as landscape level biodiversity conservation goals.	NA	
6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	As all lands within the program are privately owned, hunting, fishing, etc., is strictly controlled by the owners.
6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	
6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented successional stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	Early and late successional forest stages are under-represented the State of Indiana. Via tax incentives, the ICF encourages landowners to maintain land as forest. ICF contributes to moving forest to late successional because a significant percentage of group members do not harvest timber on their properties. However, the regeneration harvests necessary to create early successional habitat tend not to be a good fit in economic, ecological, or social terms given the small parcel size. Despite this challenge, ICF does encourage landowners to take steps to regenerate oak and other early successional types.
6.3.a.2 When a rare ecological community is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, conservation zones and/or protected areas are established where warranted.	C	Rare ecological communities are identified through the Natural Heritage database. When rare communities are identified for a property, District Foresters will advise landowner to protect that community. Other rare community types, which are not rare enough to be tracked in Natural Heritage database, are identified by District Foresters during property inspections. Given that the majority of silviculture on ICF group members is single tree selection, it is unlikely that rare community types would be damaged by logging.
6.3.a.3 When they are present, management maintains the area, structure, composition, and	C	ICFCG tracts will be continuously assessed for the presence of HCVF, including old growth by District Foresters during regular tract reinspections and other property visits.

<p>processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 	<p>Candidate areas will be submitted by the District Forester to the Group Manager who will determine if further evaluation is needed. If further evaluation is warranted, the Group Manager will set up an assessment committee.</p> <p>A day long training for district foresters on the process of identifying old growth was held on September 17 & 18, 2013 focusing in particular on old growth forests. It included a field evaluation of a potential old forest site.</p>
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<p>3. High Conservation Value Forest attributes are maintained.</p> <p>4. Old-growth structures are maintained.</p> <p>5. Conservation zones representative of old growth stands are established.</p> <p>6. Landscape level considerations are addressed.</p> <p>7. Rare species are protected.</p>		
<p>6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	NA	Not applicable given the small size of CF properties.
<p>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ul style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 	C	RMZ are protected through implementation of Indiana BMPs. Audit team observed good conformance with RMZ protection during 2014 audit.
<p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	C	Silviculture practices on ICF group members is generally consistent with maintaining plant species composition. ICF members manage for a diversity of species. Indiana has strong timber markets that utilize a diversity of species, e.g., a timber sale in District 19 included the sale of 14 different tree species. Plantings tend to be skewed toward more marketable species such as oak and walnut. However, the percent composition of oak in Indiana is decreasing, thus favoring oak in plantings is justified both ecologically and economically.
<p>6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of</p>	C	Nearly all planting stock comes from the State of Indiana nurseries that use local seed of known provenance to grow trees.

<p>quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>		
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>	<p>NC</p>	<p>Please see Minor NC 2014.3</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>	<p>C</p>	<p>Green Tree Retention Policy (p. 16 of IFC Umbrella Plan). Regeneration harvests greater than 20 acres are very uncommon on ICF properties. No regeneration harvests of this size were visited during audit.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the</p>	<p>NA</p>	<p>ICF has not had the need to justify a departure to green tree retention requirements.</p>

<p>opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 		
<p>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	C	<p>Interviews with ICF members, District Foresters, and consulting foresters showed a high level of awareness about invasive species. All management plans reviewed contained recommendation for treating invasive species, when they were present. Visited numerous properties where invasive species control projects were occurring. Funding for invasive species control is available and widely used via Environmental Quality Incentive Program (EQIP).</p>
<p>6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and</p>	C	<p>The Division of Forestry, Fire Management Program provides organizational, operational and technical support regarding wildland and prescribed fire management. Indiana Code 14-23-5-1 outlines the Division of Forestry's fire responsibilities. The Division of Forestry assumes</p>

<p>regulations.</p>		<p>Wildland fire responsibilities on ICF properties. The Division usually fulfills this responsibility through Cooperative Agreements with local fire departments to provide initial attack on wildland fires.</p>
<p>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	<p>C</p>	
<p>FF Indicator 6.4.a For family forests, the forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape (see Criterion 7.1). The consultation and assessment process may be more informal; however, on all FMUs, outstanding examples of common community types (e.g., common types with Natural Heritage viability rankings of A and B) are identified in the assessment to be protected or managed to maintain their conservation value.</p>	<p>C</p>	<p>Write up of RSA assessment provided by Brenda Huter:</p> <p>The Division of Forestry and the Division of Nature Preserves conducted a gap analysis of communities on managed/protected lands (nature preserves, state owned land, local government land, land trust land, etc) by natural region. Communities by Natural Regions list was compared to Managed Areas by Community Type and Natural Region list. 27 gaps (communities not represented by on managed lands in a given natural region) were identified.</p> <p>The Classified Forest and Wildlands parcel locations were then the compared with the locations of communities identified in the Natural Heritage Database using ArcGIS. 327 communities were located or partially located on Classified Forest & Wildlands parcels. Of the 327 communities, only 6 were gap communities. The 6 gap communities involved 8 Classified Parcels. Maps were then made of the gap communities and associated Classified Parcels.</p>
<p>FF Indicator 6.4.b Low risk of negative social or environmental impact. However, on all FMUs where outstanding examples of common community types exist (see Guidance for 6.4.a.), they should be protected or managed to maintain their conservation value.</p>	<p>C</p>	<p>The maps were then discussed with Mike Homoya and Roger Hedge, ecologists with the Division of Nature Preserves. The two “Forest – flatwoods dry” communities in the Southern Bottomlands Natural Region were removed from the gap list. Mike and Roger concurred that was an error in the data and that “Forest – flatwoods dry” communities by definition would not occur in the Southern Bottomland Natural Region but are found in the Southwestern Lowlands Natural Regions. The two natural regions are intertwined. The remaining 4 communities identified as valid gaps. The 4 gap communities are associated with 4 Classified Forest & Wildlands parcels.</p>
<p>6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the</p>	<p>C</p>	<p>Since that time DoF has evaluated each of the 4 potential RSAs. One was a Forest –Flood Plain –wet in Northern Indiana. When the district forester and a natural preserves ecologist went to the site, it was determined that the</p>

<p>following circumstances: a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.</p>		<p>community was no longer present. At some point in the past, the area had been mined for peat. The other 3 potential RSA were in far southern Indiana: a lake-pond, wetland-circumneutral seep, and forest – swamp. The other three were evaluated and confirmed by a nature preserves ecologist. None of them occur on a certified tract, but should still be managed with consideration for the community.</p>
<p>6.4.d The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p>	C	<p>At this time, there is no indication that any new gap communities are present on certified tracts.</p>
<p>6.4.e Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p>	NA	<p>All forestland in the program is private.</p>
<p>6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</p>	C	
<p>6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	C	<p>The Indiana DoF BMP manual serves this purpose.</p>
<p>6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	C	<p>All forestry operations in Indiana are held to BMP standards. Third party audits are conducted annually of a sample of harvest sites to assess adherence to BMPs.</p>
<p>6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p>	C	<p>Please see OBS 2014.4</p>

<ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate. 		
<p>6.5.d The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; 	<p>C</p>	<p>Due to the small size of the majority of the properties enrolled in the certified group, most properties have very few permanent roads through the forestland. Road density is not an issue and temporary skid trails are usually put in for harvests. Water bars were noted on all skid trails at incline and excessive erosion was only noted in one case, (due to an unusual soil substrate) where it had been repaired. Several properties, including all those managed by TNC, seed the skid trails and landings following use.</p>

<ul style="list-style-type: none"> • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 		
<p>6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written <i>Streamside Management Zone (SMZ) buffer</i> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>	C	<p>Management practices in buffer zone areas adjacent to water resources are regulated in the Indiana BMP manual. No violations of buffer zone management were noted during the field audit.</p>
<p>6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>	NA	

<p>6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of aquatic habitat. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	<p>C</p>	<p>BMPs require crossings to be rehabilitated and natural hydrology restored when removed. Several examples of crossings were noted during the audit, one of which resulted in a BMP problem that required correction when the harvest was complete.</p>
<p>6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	<p>C</p>	<p>As all tracts in the certified group are privately owned, recreation is strictly controlled. No damage due to recreational use was noted during the audit.</p>
<p>6.5.h Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	<p>NA</p>	<p>Grazing is not permitted on lands under the Classified Forest & Wildlands Program.</p>
<p>6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	<p>C/NC</p>	
<p>6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	<p>NC</p>	<p>Please see Major CAR 2014.5.</p>
<p>FF Indicator 6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs,</p>	<p>C</p>	<p>Most landowners in the certified group apply chemicals through the cost share program EQIP. The program requires a written application which contains a prescription for 3 years of invasive species control, describing all control methods (manual and chemical) and a monitoring schedule conducted by either NRCS or the DoF.</p>

<p>risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Family forest owners/managers may use brief and less technical written procedures for applying common over-the-counter products. Any observed misuse of these chemicals may be considered as violation of requirements in this Indicator. Whenever feasible, an eventual phase-out of chemical use is included in the strategy.</p>		<p>Many landowners in the certified program have invasive species control recommended in their stewardship plans and there is extensive use of the EQIP cost share funds by group members. The program appears effective and control efforts visited during the audit were largely successful, within expected limits. Due to the three year window on funding, a phase out of chemical use is anticipated in most cases.</p>
<p>6.6.c Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.</p>	<p>C</p>	<p>Explicit selection of the chemical and application method are components of the EQIP cost share application and monitoring. Most applications are foliar or applied to the cut stem.</p>
<p>6.6.d Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area.</p> <p>Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.</p>	<p>C</p>	<p>The requirements regarding written prescriptions for chemical use are met through the application required by the EQIP program. Most chemical application is done by licensed applicators hired under contract.</p>
<p>6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest</p>	<p>C</p>	<p>Effectiveness of chemical treatments is required through the EQIP program and records are maintained as a component of the application, prescription and monitoring</p>

occurrences, control measures, and incidences of worker exposure to chemicals.		forms.
6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C	
6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	C	No evidence of spills was observed on group member FMUs. District foresters demonstrated knowledge of spill incident procedures and clean-up practices. District Foresters and state forestry consultants attend commercial pesticide applicator training. District Foresters said they have appropriate licenses.
6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	Group members did not report any spills. IDEM has guidelines on chemical handling, storage, and disposal (http://www.in.gov/idem/4155.htm). Contractors must perform removal and remediation as described in OSHA decrees.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	Contractors are in FMUs for short periods due to the small size of most FMUs. Fuels and chemicals are typically stored in or near vehicles away from sensitive features. No evidence of recent spills was observed on group member FMUs and no group members interviewed reported spills.
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	C	
6.8.a Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i> , insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.	C	Indiana DNR has well qualified experts who direct the control of invasive plants. Use of biological control agents has not been widespread, except for the control of gypsy moth, where the policy is to use only <i>Bacillus thuringiensis</i> , a well-researched and often used treatment. DNR is concerned about the potential growth of kudzu in the state, and insect bio-control agents are being investigated.
6.8.b If biological control agents are used, they are applied by trained workers using proper	C	Indiana policies for pesticide safety (administered by the Office of Indiana State Chemist - Pesticide Section) assure

equipment.		conformance with the indicator.
6.8.c If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.	C	Use of biological controls in Indiana is overseen by USDA APHIS and the Office of Indiana State Chemist - Pesticide Section.
6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose	C	Other than use of GMO crops in agricultural fields (which are ineligible for enrollment as Classified Forests), no forest-related GMOs are used in Indiana.
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	The Umbrella Management plan includes planting and seeding recommendations. The document presents abundant cautions for seed mixes and nursery stock, especially non-woody plants used to stabilize bare soils and in food plots for wildlife. Exotic species are used almost exclusively for erosion control or as food for wildlife, with care taken to prevent invasive species. Red and white pine, not normally present in Indiana hardwood forests, are produced by the state nursery and used primarily for planting old field and mine reclamation sites.
6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	White pine, red pine, and black locust come from adjacent states or the few sites in the state where these species naturally occur. Most of the pine planted on private land in Indiana comes from the state nursery, which maintains documentation on a given species' provenance. Indiana DNR cooperates with Purdue University on monitoring of planting and forest improvement programs.
6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	Exotic species currently in use for commercial and management purposes pose few risks for adverse impacts. Observed exemplary efforts at many group member properties (see 2014 site notes) at identifying and controlling invasive species such as stiltgrass and ailanthus.
6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in	C	

<p>circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p>		
<p>6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	Group Umbrella Plan chapter “Enforcement & Withdrawal from Group” addresses the FSC requirements.
<p>6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	Group Umbrella Plan chapter on “Special Management Areas: Communities In Most Need of Protection” addresses the FSC requirements.
<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	In most cases, conversions, where the land remains in the program, are for wildlife openings or water ponds. DoF will assess other conversions that may not meet 6.10.c on a case-by-case basis. Conversions that are inconsistent with these requirements may result in the withdrawal of the land from the Classified Forest & Wildlands Program.
<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	C	This requirement has been explained to ICF members through newsletters and meetings. Any conversion would be identified and remedied during the pre-harvest meeting.
<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)</p>	C	One of the core objectives of ICF is to keep land forested and avoid conversion to non-forest use. Candidate areas for conversions must be submitted to DoF via CF&W Form 0690. DoF will review these conversions to ensure that they are consistent with 6.10.e. If a conversion occurs it will be documented in the property management plan.
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if</p>	C	Candidate areas for conversions must be submitted to DoF via CF&W Form 0690. DoF will review these conversions to ensure that they are consistent with 6.f requirements.

<p>removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>		
<p>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>7.1. The management plan and supporting documents shall provide:</p> <p>a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.</p>	<p>C</p>	
<p>FF Indicator 7.1.a A written management plan exists for the property or properties for which certification is being sought. The management plan includes the following components:</p> <p>i. Management objectives (ecological, silvicultural, social, and economic) and duration of the plan.</p>	<p>C</p>	<p>The following collection of documents comprise the Management Plan for IFG members:</p> <ul style="list-style-type: none"> - Management Plan - Natural Heritage Database documentation - Archeological check documentation - Timber sale contracts

<p>Guidance: Objectives relate to the goals expressed by the landowner within the constraints of site capability and the best available data on ecological, silvicultural, social and economic conditions.</p> <p>ii. Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information.</p> <p>Guidance: In addition to stand-level descriptions of the land cover, information in site-level plans may include: landscape within which the forest is located; landscape-level considerations; past land uses of the forest; legal history and current status; socio-economic conditions; cultural, tribal and customary use issues and other relevant details that explain or justify management prescriptions.</p> <p>iii. Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used.</p> <p>iv. Description of harvest limits (consistent with Criterion 5.6) and species selection. Also, description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate.</p> <p>v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).</p> <p>Guidance: Regional environmental assessments and safeguards or strategies to address pest and weed management, fire management, protection of rare, threatened,</p>	<ul style="list-style-type: none"> - Annual Report for each property - Classified Forest and Wildlands Database (w/ Mapping System) - IFG Umbrella Plan - Classified Forest & Wildlands Procedure Manual - Indiana Logging and Forestry Best Management Practices – 2005 BMP Field Guide. <p>This collection of documents covers the requirements of 7.1.a.</p> <p>ICF has three main documents that make up the FMP, however, there are several supporting documents to the FMP available to group members in Indiana Department of Forestry publication and websites, such as the Indiana Forestry Exchange (http://www.in.gov/dnr/forestryexchange/default.aspx). The three main FMP documents are: Classified Forest & Wildlands Procedures Manual, dated October 1, 2007 (CFWPM), which is a procedural manual for management of group members; Indiana Classified Forest Certified Group: UMBRELLA MANAGEMENT PLAN, dated November 2010 (UMP), which includes several items that demonstrate conformance to FSC requirements at the group level, and group member eligibility and division of responsibilities; and Stewardship Management Plan (SMP), which serves as the FMU-specific FMP for individual group members.</p> <p>i. Management objectives for the group level and group member level are contained in the introduction and Management Objectives section of the UMP (p. 11). This includes ecological, silvicultural (referred to as Desired Future Conditions), social, and economic objectives. Specific group member level objectives are included on the first page of each group member’s SMP, as well as the Area Description & Management Recommendations section.</p> <p>ii. The UMP contains a description of the State of Indiana’s forest resources (p.p. 8-10), including historical and present day forest cover as a percentage of land cover type. Inventory data references the US Forest Service’s Forest Inventory and Analysis (FIA) data. Forest types classified by dominant species were determined through use of the FIA EVALIDATOR 4.0 tool and FIA data. The Property Overview</p>
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<p>and endangered species and plant community types, protection of riparian management zones, and protecting representative samples of ecosystems and High Conservation Value Forests may be developed by state conservation agencies. Site specific plans for family forests should be consistent with such guidance and may reference those works for clarity.</p> <p>vi. Description of location and protection of rare, threatened, and endangered species and plant community types.</p> <p>vii. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8.</p> <p>viii. Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected areas in a manner that clearly relates to the forest description and management prescriptions.</p> <p>Guidance: Property level maps for family forests may be simple and efficient to produce, and may cover only the necessary information needed for management to the FSC-US Family Forest Standard. At the group level, if GIS is used coverage should include protected areas, planned management activities, land ownership, property boundaries, roads, timber production areas, forest types by age class, topography, soils, cultural and customary use areas, locations of natural communities, habitats of species referred to in Criterion 6.2, riparian zones and analysis capabilities to help identify High Conservation Value Forests. Group managers may rely on state conservation agencies for complex GIS services.</p>	<p>and Area Description & Management Recommendations sections of the SMP contain specific information on species and size/ age class at the stand level for each group member FMU.</p> <p>DNR reports that landowners usually list timber production and harvesting as a low priority. Therefore, the district foresters don't emphasize inventories or other quantitative data collection unless the landowner expresses an interest in timber management.</p> <p>DNR initiated a system wide continuous forest inventory (CFI) that will allow them to estimate growths and removals on a Classified Forest & Wildland wide basis. They are just wrapping up the 3rd year of CFI. Once this data is analyzed, DNR will have trend data specific to classified forests.</p> <p>iii. Typical silvicultural systems and their rationale are described in the UMP (p.p. 12-15). Special management considerations and other management considerations are also in the UMP (p.p. 14-16). Harvest systems are described in the Harvest Equipment section of the UMP (p.16).</p> <p>iv and vii. Species selection based on ecological guild (e.g., shade tolerance, conifer vs. hardwood) is covered in the UMP in both the Forest Types (p. 9) Forest Growth & Dynamics Monitoring (p.p. 16-18) sections. ICF relies on FIA data to establish sustainable harvest rates and to monitor forest growth and dynamics. The volumes and growth rates are included on p. 9 for ICF as a whole. The Resource Description section of the SMP is where FMU-specific inventory information would be documented for individual group members.</p> <p>ICF supplements the FIA program with Continuous Forest Inventory (CFI). Five regions to sample on ICF group member FMUs have been selected. At the group member level, the establishment of an inventory system depends on the size of the tract and the intensity of management (p.p. 17-18 of UMP). Monitoring of growth on small tracts will be based on qualitative factors due to the light intensity of</p>
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		<p>management.</p> <p>Other monitoring protocols are described in the UMP, including: Monitoring of BMPs (p.21), Game Species (p. 24), and nongame species (p. 24), cultural resources (pests and invasive species (p.p. 27-29), IPM (p. 29), and use of non-native species (p.30)</p> <p>The CFWPM contains monitoring protocols for monitoring of group member FMUs.</p> <p>vi. At the group level, ICF uses the Indiana DNR, Division of Nature Preserves’ Natural Heritage Data Center to assess for the presence of RTE species on group member FMUs (see p. 25 of UMP). In the SMP, RTE species and sensitive habitats would be described in the Sensitive Area/ Species Protection and Management section.</p> <p>viii. A map of the FMU is included as part of the SMP. Group members may also access mapping resources (e.g., NRCS soil mapper) via the Indiana Forestry Exchange Website. ICF also maintains several maps at the state, district, and FMU level that show water courses, land cover, roads, property boundaries, protected areas, etc.).</p> <p>Please see OBS 2014.6</p>
<p>FF Indicator 7.1.b Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.</p>	<p>C</p>	<p>Please see OBS 2014.7</p>
<p>7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>	<p>C</p>	
<p>7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>	<p>C</p>	<p>The most recent versions of the UMP and SMP were modified during the past two years. Information on tree retention, invasive species, and endangered or threatened species (such as bats) are included in recent revisions. DoF is exploring and implementing new digital mapping and planning tools. ICF’s management planning documents are</p>

At a minimum, a full revision occurs every 10 years.		up-to-date with the requirements of the FSC US standard.
7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	Please see OBS 2014.8
7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	The UMP is available on the Indiana Department of Forestry website. The SMP template is available upon request from DNR staff. Other management planning documents are available upon request. These contain the primary elements of C7.1.
7.4.b Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.	NA	ICF does not have any group members with public FMUs.
<p>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	C	
FF Indicator 8.1.a For Family Forests, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol. Monitoring	C	Section "Forest Growth & Dynamics Monitoring" in the group plan describes group manager and group member monitoring roles. In addition to FIA & CFI plot establishment and monitoring, DoF conducts regular BMP monitoring on

<p>may be scaled to the size and intensity of the management operations that affect the resources identified in C8.2.</p>		<p>10% of reported harvest sites annually. All parcels in the Classified Forest & Wildlands Program are visited and reviewed every five years by a District Forester. Group members are responsible for informal, qualitative monitoring of forest conditions.</p>
<p>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</p>	<p>C</p>	
<p>8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	<p>C</p>	<p>Please see OBS 2014.9.</p>
<p>8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	<p>C</p>	<p>Monitoring of unanticipated loss occurs through:</p> <ul style="list-style-type: none"> • Indiana DoF Forest Health Surveys (aerial surveys) • Landowner identification resulting in visit from District Forester or consultant. • Forest inventory prior to and following harvest activities • Unanticipated removal (i.e., timber theft) is uncommon and thus only monitored passively.
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	<p>Annual reports collected by DoF from each landowner in the program collect harvest data, including number of trees harvested, bd ft volume, and species. Although landowners do not always provide the information, an adequate system is in place to monitor annual removals.</p>
<p>8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their <i>habitats</i>; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 	<p>C</p>	<ul style="list-style-type: none"> • DoF periodically monitors habitat conditions for all plants and animals as part of its periodic inventory of forest stand types and stocking levels. • The location and status of invasive species is routinely monitored by field foresters. • DoF works with the Division of Nature Preserves to monitor the condition of protected areas and set-asides.

<p>4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4).</p>		
<p>8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	C	Such monitoring occurs and is described in the DoF Classified Forest & Wildlands Procedures Manual and the Group Umbrella Plan. A sample of 10% of harvest sites are monitored for BMP impacts annually. All harvest sites are subject to close-out inspections.
<p>8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>		Such monitoring occurs and is described in the DoF Classified Forest & Wildlands Procedure Manual and the Group Umbrella Plan.
<p>8.2.d.3 The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).</p>	C	Addressed in the Indiana Statewide Forest Assessment & Strategy .
<p>8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.</p>	C	See Family Forest applicability note and DoF determination of NA.
<p>8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).</p>	C	See Principle 3.
<p>8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.</p>	C	Timber management activities on non-industrial properties are structured and monitored to ensure revenue is sufficient to pay for the logging costs and the consulting forester. Since harvests typically only occur every 15-20 years, there is little opportunity to assess productivity and efficiency of management on any regular basis. Land owners use simple cost-benefit calculations to determine efficiency of their overall management choices (i.e., enroll in Classified Forests and manage for timber products).
<p>8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</p>	C	
<p>8.3.a When forest products are being sold as FSC-</p>	C	See COC indicators for FMEs.

certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.		
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See COC indicators for FMEs.
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	C	
8.4.a The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	C	Addressed during and following harvest, during 5-year re-inspection as needed, and at 10 year plan re-write. All DF's are provided with tablet computers and access to centralized planning database to facilitate plan updates. Statewide BMP monitoring on CWP parcels helps assess how well BMPs are being implemented generally across the State on ICFCG members.
8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.	C	Occurs through 5-year re-inspections and post-harvest monitoring. When management activities deviate from the plan, DF's follow-up with recommended and/or mandatory actions to ensure the trajectory of the property is aligned to management objectives.
8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	C	
8.5.a While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring	NC	Please see Minor NC 2014.10

<p>information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.</p>		
<p>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ul style="list-style-type: none"> a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). 		
<p>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>C</p>	
<p>9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	<p>NC</p>	<p>Please see Minor CAR 2014.11</p>
<p>FF Indicator 9.1.b In developing the assessment, the forest owner or manager consults with databases, qualified experts, and/or best available research and literature.</p>	<p>C</p>	<p>In developing the HCVF assessment thus far, DoF conducted several GIS analyses, consulted the state natural heritage database for S1 and S2 communities.</p>
<p>9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.</p>	<p>C</p>	<p>A summary of ecological communities or habitat types identified as HCVF, as well as a process for identifying HCVF as land is added to the certified group, is described in the Umbrella Plan, p.36.</p>
<p>9.2 The consultative portion of the certification</p>	<p>C</p>	

<p>process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>		
<p>9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.</p>	C	<p>If potential HCVF are identified and require further analysis to be designated, the Stewardship Coordinator will put together an assessment committee to consult on the proposed areas and ensure HCVF are accurately identified.</p>
<p>9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.</p>	NA	<p>All lands in the program are private.</p>
<p>9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	C	
<p>9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>	C	<p>The Umbrella Plan describes specific habitat types that will be considered HCVF (e.g. hemlock stands, native pine stands, etc.) and the management measures necessary to ensure maintenance of these areas.</p>
<p>9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.</p>	C	<p>As described in the Umbrella Plan, all management activities described for HCVF should ensure their maintenance, however no HCVF were visited during the field audit that necessitated active management.</p>
<p>9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.</p>	C	<p>No instances of HCVF crossing ownership or management boundaries have been identified to date. This is a relatively unlikely scenario, given that the majority of properties in the certified group are small and tend to be isolated forest fragments, often bordered by roads or agricultural fields.</p>
<p>9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable</p>	C	

conservation attributes.		
<p>9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.</p> <p>FF Indicator: Low risk of negative social or environmental impact for private family forests. Public lands must follow the requirements in Indicator 9.4.a.</p>	C	No evidence of non-compliance was noted in the field.
<p>9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.</p>	C	No HCVF sites were noted for increased risk during the field audit. Should any increased risk be determined for any identified HCVF, DoF is aware of the requirements.

Appendix 6 – Tracking, Tracing and Identification of Certified Products

SCS FSC Chain of Custody Indicators for Forest Management Enterprises, Version 5-0

REQUIREMENT	C/ NC	COMMENT/CAR
1. Quality Management		
1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.	C	Brenda Huter, Forest Stewardship Coordinator, is identified in this role.
1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products” requires retention of records for five or more years.
1.3 The FME shall define its forest gate(s) (check all that apply): <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i>	C	<p><input checked="" type="checkbox"/> Stump <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.</i></p> <p><input type="checkbox"/> On-site concentration yard <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p><input checked="" type="checkbox"/> Off-site Mill/Log Yard <i>Transfer of ownership occurs when certified-product is unloaded at purchaser’s facility.</i></p> <p><input type="checkbox"/> Auction house/ Brokerage <i>Transfer of ownership occurs at a government-run or private auction house/ brokerage.</i></p> <p><input checked="" type="checkbox"/> Lump-sum sale/ Per Unit/ Pre-Paid Agreement <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.</i></p> <p><input checked="" type="checkbox"/> Log landing <i>Transfer of ownership of certified-product occurs at landing/yarding areas.</i></p> <p><input type="checkbox"/> Other <i>(Please describe):</i></p>
1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.	C	Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products”.

<p>1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation.</i></p>	<p>C</p>	<p>Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products”.</p>
<p>2. Product Control, Sales and Delivery</p>		
<p>2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).</p>	<p>C</p>	<p>All timber sales sold as certified visited during the audit had trip tickets identifying each load as certified, with the code and claim.</p>
<p>2.2 The FME shall maintain records of quantities/volumes of FSC-certified product(s).</p>	<p>NC</p>	<p>Please see CAR 2014.12</p>
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> a) name and contact details of the organization; b) name and address of the customer; c) date when the document was issued; d) description of the product; e) quantity of the products sold; f) the organization’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: <ul style="list-style-type: none"> i. the claim “FSC 100%” for products from FSC 100% product groups; ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups. h) If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other. 	<p>C</p>	<p>Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products” includes relevant instructions. Trip tickets for certified sales checked on site during the audit were found to be in conformance.</p>
<p>2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product. Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2</p>	<p>C</p>	<p>Haul tickets used by COC certified primary producers include information about whether the logs are from a certified Classified Forest tract.</p>

<p>2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company’s webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria:</p> <ul style="list-style-type: none"> a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence. <p><i>FSC-ADVICE-40-004-05</i></p>	NA	
<p>3. Labeling and Promotion <input type="checkbox"/> n/a</p>		
<p>3.1 Describe where/how the organization uses the SCS and FSC trademarks for promotion.</p>	C	<p>The Group Manager uses FSC trademarks on public Internet pages and in educational publications and news releases.</p>
<p>3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.</p>	NC	<p>Please see Major CAR 2014.13</p>
<p>3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.</p>	NC	<p>Please see Major CAR 2014.13</p>
<p>4. Outsourcing <input type="checkbox"/> n/a</p>		
<p>4.1 The FME shall provide the names and contact details of all outsourced service providers.</p>	NC	<p>Please see Major CAR 2014.14</p>

<p>4.2 The FME shall have a control system for the outsourced process which ensures that:</p> <ul style="list-style-type: none"> a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use. 	<p>NC</p>	<p>Please see Major CAR 2014.14</p>
<p>5. Training and/or Communication Strategies</p>		
<p>5.1 All relevant FME staff and outsourcers shall be trained in the FME's COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME's COC control system.</p>	<p>C</p>	<p>FME staff receive COC-related training. District Foresters demonstrated how training records are logged in an online database administered by the central office. District foresters instruct loggers and consulting foresters in obtaining the CoC number in the event of a certified sale. Group participants conducting a certified sale were visited during the audit and their CoC documentation found to be in order.</p>
<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).</p>	<p>C</p>	<p>FME staff receive COC-related training. District Foresters demonstrated how training records are logged in an online database administered by the central office.</p>

Appendix 7 – Peer Review and SCS Evaluation Team Response to Peer Review

Peer review is not required for recertification.

Appendix 8 – SLIMF Eligibility Criteria

An FMU qualifies as a 'SLIMF' if it is either a 'small' FMU OR managed as a 'low intensity' FMU. Any SLIMF FMU under the scope of the FME under evaluation must meet at least one of the following criteria:

<input type="checkbox"/> N/A – none of the FMU(s) under evaluation qualify as a SLIMF according to the criteria below.	
<input checked="" type="checkbox"/> 'Small' FMU(s)	<input type="checkbox"/> The scope of the certificate includes FMU(s) of 100 ha (247 acres) or less.
	<input checked="" type="checkbox"/> The scope of the certificate includes FMU(s) located in a country for which the definition for maximum size of “small” is larger than 100 ha (247 acres), but does not exceed 1,000 ha (2, 471 acres).
	<input type="checkbox"/> The scope of the certificate includes FMU(s) of 1000 ha (2,471 acres) or less where there is no FSC-accredited national initiative and the national stakeholders support the larger size-limit proposed by the certification body.
<input type="checkbox"/> 'Low intensity' FMU(s) – The scope of the certificate includes FMU(s) in which the rate of harvest is less than 20% of the mean annual increment (MAI) AND these FMUs meet one of the following additional criteria:	<input type="checkbox"/> The annual harvest from the total production forest area is less than 5000 cubic meters (2.1 million board feet).
	<input type="checkbox"/> The average annual harvest from the total production forest is less than 5000 m ³ / year (2.1 million board feet / year) during the period of validity of the certificate as verified by harvest reports and surveillance audits.

Appendix 9 – Group Management Programs

SCS audits Group entities and group members to the FSC Group Management Standard with the same frequency. All Principles in the FSC Forest Management Standard are evaluated – during the full evaluation or reevaluation audit and once again over the course of validity of the certificate during annual surveillance audits. SCS will also audit group clients to the Group Management Standard if there have been substantial changes to group management or the scope of the certificate during the previous year, such as a large change in the number of group members or changes to the policies of administering the group.

Group Management Conformance Table

Requirement	C/NC	Comment / CAR
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PART 1 QUALITY SYSTEM REQUIREMENTS		
C1 General Requirements		
1.1 The Group entity shall be an independent legal entity or an individual acting as a legal entity.	C	The independent legal entity is the State of Indiana. See p.p. 1-3 of ICFCG Umbrella Plan for the full history of state laws that establish the State of Indiana’s Division of Forestry as the manager of the group program with technical assistance provided by the Division of Fish & Wildlife.
1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.	C	The group entity, Indiana Division of Forestry Classified Forest & Wildlands Program (ICF), is responsible for paying fees to the certification body (CB) and AAF to FSC through the CB. ICF is up-to-date on payments to the CB.
1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.	C	This statement is clearly provided on p.1 of the Umbrella Management Plan.
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.	NC	Please see CAR 2014.15
C2 Responsibilities		
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 responsibilities of all parties noted on the Group Org chart, including additional involved parties such as group members, professional foresters, wildlife biologists and other relevant forestry professionals, are listed beginning on p.4 of the Umbrella Plan.
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	This position is noted on the Org Chart and is currently held by Brenda Huter.
2.3 Group entity staff and Group members shall demonstrate knowledge of the Group’s	C	ICF provides a list of training opportunities for ICF staff, group members, and private forestry

procedures and the applicable Forest Stewardship Standard.		professionals. District newsletters are developed by District Foresters- informational brochures, e.g., controlling invasive species, are often sent by District Foresters along with Management Plan, to ensure group members are knowledgeable about related FSC requirements.
C3 Group entity's procedures		
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	
I. Organizational structure;	C	p.3 of the Umbrella Plan
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	p.4 of the Umbrella Plan
III. Rules regarding eligibility for membership to the Group;	C	Eligibility is explained in the Umbrella plan and includes eligibility under the Classified Forest and Wildlands Program.
IV. Rules regarding withdrawal / suspension of members from the Group;	C	Voluntary withdrawal and mandatory withdrawal are described on p.7 of the Umbrella Plan.
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	The issuance of corrective actions and the decisions to create timelines to fulfill them are described beginning on p.7 of the Umbrella Plan. The Guidance table provides further description of how to issue corrective actions for specific nonconformities.
VI. Documented procedures for the inclusion of new Group members;	C	This is included in the <i>Group Enrollment</i> section of the Umbrella Plan (p. 5).
VII. Complaints procedure for Group members.	C	Complaint procedure is in Umbrella Plan.
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.	C	ICF's group management planning documents and procedures and the underlying State of Indiana laws that establish the ICF program provide a framework for an efficient internal control system ensuring that all members are

		fulfilling applicable requirements.
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	The Umbrella Plan assigns responsibility for group management procedures to ICF staff positions located at the state and district levels.
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 nonconformances 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. <i>NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.</i>	C	ICF has established a robust internal evaluation system for the group program. Umbrella Plan describes procedures for initial inspection and re-inspection of group member forestlands. In the Umbrella Plan, it is the District Forester’s responsibility to inspect all certified group members at 5 year intervals and may conduct site visits during environmental impact assessments or active timber sales. Eligibility to join the Classified Forest & Wildlands Program and the FSC group certificate is determined during initial field visits.
C4 Informed consent of Group members		
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:	C	
i. Access to a copy of the applicable Forest Stewardship Standard;	C	One of ICF’s mechanisms to provide access to the applicable Forest Stewardship Standard is the Classified Forest & Wildlands Program webpage (http://www.in.gov/dnr/forestry/7536.htm ;
ii. Explanation of the certification body’s process;	C	Umbrella Plan (p.2)
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	Umbrella Plan (p.2)
iv. Explanation of the certification body’s, and FSC’s requirements with respect to publication of information;	C	Umbrella Plan (p.2)
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</i>	C	Umbrella Plan

<p><i>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></p>		
<p>a. maintenance of information for monitoring purposes;</p>	C	<p>Assignment of membership records and reporting to group entity staff, group members, and supporting private contractor (private foresters and other forestry professionals) is described in the Umbrella Plan .</p>
<p>b. use of systems for tracking and tracing of forest products;</p>	C	<p>This is described in the <i>Marketing of Forest Products</i> section of the Umbrella Plan. Group members must contact their District Forester prior to making a certified sale to be informed of tracking and tracing requirements.</p>
<p>c. requirement to conform with conditions or corrective action requests issued by the certification body and the group entity</p>	C	<p>The process for addressing any internal CARs is included in the <i>Enforcement & Mandatory Withdrawal</i> section of the Umbrella Plan. It includes a clear description of timelines and implications for any CARs that are not complied with, including that failure to conform may result in expulsion from the group. It includes a clear description of timelines and implications for any CARs that are not complied with, whether these be from the certification body (CB) or ICF. ICF maintains that since it will be communicating all CARs to individual group members that it need not differentiate between CARs issued by ICF or the CB in the Umbrella Plan.</p>
<p>d. any special requirements for Group members related to marketing or sales of products within and outside of the certificate;</p>	C	<p>This is described in the <i>Marketing of Forest Products</i> section of the Umbrella Plan. All sales of FSC-certified products by group members are direct to COC-certified loggers or mills. COC requirements for the sale of certified logs or firewood are also in this section.</p>
<p>e. other obligations of Group membership; and</p>	C	<p>ICF group members must be enrolled in the State of Indiana's Classified Forest & Wildlands Program.</p>
<p>f. explanation of any costs associated with Group membership.</p>	C	<p>This is described in the <i>Group Fees</i> section of the Umbrella Plan.</p>
<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</i></p>	C	<p>Group Members opt in to the FSC group at the initial enrollment and at the 5-year re-inspection. The information provided to opt in meets the requirements below.</p>

<i>any other document (e.g. meeting minutes) that specifies the agreed relationship between the Group member and the Group entity.</i>		
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	
C5 Group Records		
5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include: <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>	C	
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	Tracked in INFRMS
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	Tracked in INFRMS
iii. A map or supporting documentation describing or showing the location of the member's forest properties;	C	The location of group member properties is included on maps on p.p. 8 & 10 of the Umbrella Plan. Group members must have a legal parcel description in order to join the group, thus ensuring that coordinates and area of each FMU are known. Maps of group member properties are also stored in physical files at each District Office.
iv. Evidence of consent of all Group	C	The signature page for consent is stored in each

members;		group member’s file at district offices.
v. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems);	C	Typical silvicultural systems are described in the Umbrella Plan (p.p. 12-16), as well as in individual group member stewardship plans. Harvest records are included in Annual Reports. Harvest history is also documented in updates to each group member’s SMP.
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	Annual Reports, correspondence, inspection and reinspection reports, withdrawal forms, and certification departure requests are stored in district offices for each group member. Inspection and re-inspection reports list identified non-compliances and actions taken to correct non-compliances.
viii. Records of the estimated annual overall FSC production and annual FSC sales of the Group.	C	Tracked through annual reports as entered into INFRMS.
5.2 Group records shall be retained for at least five (5) years.	C	The 5 year requirement is stipulated for COC procedures in the Umbrella Plan for group members conducting certified sales. Procedures stipulate that the group entity shall maintain records of Annual Reports for a minimum of 10 years. Some documents (e.g., original application) are kept for 15 years or indefinitely in hard files at each District office.
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	ICF does not issue any kind of certificates or declarations to its group members that could be confused with FSC certificates.
PART 2 GROUP FEATURES		
C6 Group Size		
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	ICF has sufficient human and technical resource to manage and control the group in line with the requirements of this standard. District foresters regularly communicate with group members and the community at large through field tours and presentations. Budget cuts and unfilled vacancies have stretched the ability of DoF to continue to grow and execute the program in an exemplary manner. The audit team was concerned that further reductions in staffing or increases in program responsibilities (e.g.program growth) without

		staffing increases would lead to problems with FSC conformance.
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 and technical capacities of the Group entity.	C	Maximum group size defined in Umbrella plan.
C7 Multinational groups		
7.1 Group schemes shall only be applied to national groups which are covered by the same Forest Stewardship Standard.	C	All group members are in the state of Indiana (located entirely within the continental USA), per Indiana regulation.
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	
PART 3 INTERNAL MONITORING		
C8 Monitoring requirements		
8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following:	C	
i. Written description of the monitoring and control system;	C	Monitoring is documented in <i>Monitoring of BMPs</i> in the Umbrella Plan. Division of Forestry also produces an annual monitoring summary of the BMP results. Monitoring procedures for site visits to group member FMUs is also described in CFW procedures.
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.	C	Each year, 10% of timber sales are monitored for BMP using the Indiana Forestry BMP Monitoring Form. At the group member level, District foresters are involved in timber sales and monitor implementation of BMPs at least once during an active harvest. Post-harvest visits are also conducted.
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	ICF has two main types of internal audits. One is the site re-inspection, during which the Stewardship Management Plan (SMP) is updated with input from the group member. The SMP template contains the criteria that must be addressed in the group member's site-specific FMP.

		<p>BMP monitoring is done on approximately 10% of ICF. ICF uses a form that contains the criteria to be assessed. These are summarized each year in a publically available report.</p> <p>ICF conducts a pre-sale harvest conference and a post-harvest visitation & evaluation. These two internal audits are recorded on their respective forms that contain the criteria to be assessed.</p>
<p>8.3. The minimum sample to be visited annually for internal monitoring shall be determined as follows:</p> <p><i>NOTE: for the purpose of sampling, FMUs < 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></p>		
<p>a) Type I Groups with mixed responsibilities (see section D Terms and definitions) Groups or sub-groups with mixed responsibilities shall 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.</p>	C	<p>Although ICF assists landowners in preparation of management plans and may have some oversight in harvesting, ICF is considered a Type 1 Group due to the responsibilities being divided between group members and ICF staff. ICF is eligible for RMU designation, however, due to its involvement in management planning and oversight of group members. See SCS' write-up in the sampling section of the 2011 annual audit for more information.</p>
<p>b) Type II Resource Manager Groups (see section D Terms and definitions) 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).</p>	NA	
<p>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.</p>	C	<p>All group members are under natural/ semi-natural forest management. Most group members have tracts less than 100 ha in size. The fact that ICF updates 20% of SMPs per year provides that ICF reasonably visits members in both the 0-100 ha and 100-1,000 ha range.</p>
<p>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</p>	C	<p>Since ICF samples more group members than is required under this standard, they visit several group members each year that the CB does not.</p>

requiring a revisit of the same units.		
8.6 In the selection process of members to be visited, the Group entity should include random selection techniques.	C	ICF uses random sampling techniques to select group members for BMP evaluation. For SMP updates, these are not random. In general, as ICF visits more group members that required by the standard, they are at low risk of failing to uncover nonconformities on group member FMUs.
8.7 The Group entity shall issue corrective action requests to address non-compliances identified during their visits and monitor their implementation.	C	The process for addressing any internal CARs is included in the <i>Enforcement & Mandatory Withdrawal</i> section of the Umbrella Plan (p. 6). It includes a clear description of timelines and implications for any internal CARs that are not complied with. Monitoring is documented in <i>Monitoring of BMPs</i> in the Umbrella Plan (p. 21-22). CARs may be issued to ensure compliance with BMPs.
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	ICF schedules additional visits for pre-harvest, during harvest, and post-harvest. These are conducted to ensure conformance to certification requirements.
C9 Sales of forest products and use of the FSC trademark		
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	ICF has documented the system for Marketing of Forest Products in the Umbrella Plan.
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 entity.	C	The sales protocol described in the Umbrella Plan requires that certified material remain physically separate from non-certified material. SCS viewed conformance with this in District 19.
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	The sales protocol described in the Umbrella Plan covers the required information in FSC-STD-40-004 V2-0 Clause 6.1.1. Documentation and implementation required to demonstrate conformance to part C) of COC 1.3.1 and COC 1.5 (if applicable) fulfills the requirements of indicator 9.3.
9.4 The Group entity shall ensure that all uses of the FSC Trademark are approved by the responsible certification body in advance.	C	Documentation and implementation required to demonstrate conformance to COC 1.4 and 1.5 (if applicable) fulfills the requirements of indicator 9.4.

Group Management Program Members

All group members' identification and property information is tracked in INFRMS, the DoF database system. As SLIMF group members, identifying information at the property level is confidential, but a full list of all participating group members is maintained in INFRMS. Current certified lands in the program breakdown as follows: Certified Acres, 521,213.550; Certified Tracts, 10,527; Certified Landowners 7,776.