



**SmartWood**

*Practical conservation through certified forestry*

Forest Management  
**Test Evaluation Report**

**Chequamegon-Nicolet National Forest**  
in  
**Wisconsin, USA**

**Report Finalized:** June 22, 2007

**Test Evaluation Date:** October 30-November 4, 2006

**Test Evaluation Team:**

Dan Pubanz, Lead Auditor & Forester

Don Taylor, Forester, Co-Leader

Stephen Grado, Socio-Economist

Kevin Russell, Wildlife Biologist

John Kotar, Forest Ecologist

**Operation Contact:** Geoff Chandler

**Address:** Chequamegon Nicolet National Forest

68 S. Stevens Street

Rhinelander, WI 54501

Test Evaluation

Performed by:

SmartWood US Region

101 East Fifth Street, Suite 208

Northfield, MN 55057

Tel: 507.663.1115

Fax: 507.663.7771

Contact person: Dave Bubser

dbubser@ra.org

## TABLE OF CONTENTS

INTRODUCTION.....	5
1. SCOPE OF THE EVALUATION .....	6
1.1. SCOPE OF THE EVALUATION .....	6
1.2. EXCLUSION OF AREAS FROM THE SCOPE OF EVALUATION.....	6
2. TEST EVALUATION PROCESS .....	7
2.1. STANDARD USED FOR THE TEST EVALUATION.....	7
2.2. TEST EVALUATION TEAM AND QUALIFICATIONS.....	8
2.3. REPORT PEER REVIEWERS .....	8
2.4. TEST EVALUATION SCHEDULE .....	9
2.5. EVALUATION STRATEGY .....	10
2.6. STAKEHOLDER CONSULTATION PROCESS .....	11
3. TEST EVALUATION FINDINGS AND OBSERVATIONS.....	14
3.1. STAKEHOLDER COMMENTS RECEIVED .....	14
3.2. MAIN STRENGTHS AND WEAKNESSES .....	18
3.3. IDENTIFIED NON-COMPLIANCES AND CORRECTIVE ACTIONS.....	23
3.4. FOLLOW-UP ACTIONS REQUIRED TO MEET THE STANDARD USED IN THE TEST EVALUATION....	25
3.5. OBSERVATIONS .....	25
3.6. TEST EVALUATION SUMMARY .....	27
4. CLIENT SPECIFIC BACKGROUND INFORMATION .....	28
4.1. OWNERSHIP AND LAND TENURE DESCRIPTION .....	28
4.2. LEGISLATIVE AND GOVERNMENT REGULATORY CONTEXT .....	28
4.3. ENVIRONMENTAL CONTEXT .....	29
4.4. SOCIOECONOMIC CONTEXT.....	29
APPENDIX I: FSC Reporting Form: Detailed FMO information.....	32
APPENDIX II: Public summary of the management plan.....	35
APPENDIX III: Test evaluation standard conformance checklist (confidential).....	37
APPENDIX IV: Chain of Custody Standard Conformance Checklist (confidential).....	138
APPENDIX VI: List of all visited sites (confidential) .....	141
APPENDIX VII: Detailed list of stakeholders consulted (confidential).....	145
APPENDIX VIII: Peer review addenda (confidential).....	189
APPENDIX IX: SmartWood Additional Considerations .....	197
APPENDIX X: FMO map .....	200

## **ACRONYMS**

AAC	Annual Allowable Cut
ADR	Alternative Dispute Resolution
ANF	Allegheny National Forest
ARPA	Archaeological Resource Protection Act
ASQ	Allowable Sale Quantity
ATV	All-terrain Vehicle
USDA	United States Department of Agriculture
BMPs	Best Management Practices
CARs	Corrective Action Requests
CE	Categorical Exclusion
CITES	Convention on Trade in Endangered Species
CBD	Convention on Biological Diversity
CCC	Civilian Conservation Corps
CDS	Combined Data System
CoC	Chain-of-Custody
CNNF	Chequamegon-Nicolet National Forest
DNR	Department of Natural Resources
DOD	Department of Defense
DOE	Department of Energy
EA	Environmental Assessment
EIS	Environmental Impact Statement
ELT	Ecological Land Types
EOEA	Equal Opportunity Employment Act
FAR	Federal Acquisition Regulation
FEIS	Final Environmental Impact Statement
FIA	Forest Inventory and Analysis
FMO	Forest Management Organization
FMU	Forest Management Unit
FOIA	Freedom of Information Act
FSC	Forest Stewardship Council
FSH	Forest Service Handbook
FSM	Forest Service Manual
FSV	Field Sampled Vegetation
GIS	Geographic Information System
GLIFWC	Great Lakes Indian Fish & Wildlife Commission
HCVF	High Conservation Value Forest
HRV	Historic Range of Variability
ILO	International Labour Organization
IPM	Integrated Pest Management
IRPG	Incident Response Pocket Guides
JHA	Job Hazard Analysis
LRMP	Land and Resource Management Plan
MIH	Management Indicator Habitats
MIS	Management Indicator Species
MSDS	Material Safety Data Sheets
MUTCD	Manual on Uniform Traffic Control Devices
NEPA	National Environmental Policy Act
NFFE	National Federation of Federal Employees

NFMA	National Forest Management Act
NNFBS	Nicolet National Forest Bird Survey
NNIS	Non-native Invasive Species
NTFP	Non-timber Forest Products
NVUM	National Visitor Use Monitoring
OBS	Observation
OGM	Oil and Gas Management
ORV	Off Road Vehicle
OSHA	Occupational Safety and Health Administration
OWCP	Office of Workers Compensation
P&C	Principles and Criteria of the FSC
PIC	Pinchot Institute for Conservation
PILT	Payments in Lieu of Taxes
PPE	Personal protective equipment
PU	Purchase Unit
PwC	PricewaterhouseCoopers
RFSS	Regional Forest Sensitive Species
ROPS	Regional Operation Program
RT&E	Rare, threatened, and endangered
SFI	Sustainable Forestry Initiative
SHPO	State Historic Preservation Officer
SRSCS	Secure Rural Schools and Community Self-Determination Act of 2000
SMZs	Streamside Management Zones
SW	SmartWood
USDA	United States Department of Agriculture
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
WDNR	Wisconsin Department of Natural Resources

### Standard Conversions

1 acre = 0.405 hectares  
 1 foot = 0.3048 Meters  
 1 mile = 1.60934 Kilometers

1 mbf = 5.1 m<sup>3</sup>  
 1 cord = 2.55 m<sup>3</sup>  
 1 Gallon (US) = 3.78541 Liters

## INTRODUCTION

The Chequamegon-Nicolet National Forest (CNNF), in northern Wisconsin, USA, is participating in a test evaluation of the applicability of third party forest certification on United States Department of Agriculture (USDA) Forest Service lands. This independent study was initiated by the Pinchot Institute for Conservation (PIC). The study will provide a test evaluation of current management on the national forests of the United States with respect to the Forest Stewardship Council (FSC) regional standards and the SmartWood (SW) forest management evaluation processes. The project will include case studies on five forests within the National Forest System, including the CNNF.

This case study of the CNNF began with a test pre-evaluation. The test pre-evaluation was conducted to prepare both the CNNF and SmartWood for a full test evaluation. The focus of the test pre-evaluation was on general orientation, document and procedural reviews, and logistical planning for the test forest management evaluation. This test pre-evaluation also included a concise, preliminary determination of readiness to advance to the full test evaluation. Subsequent to the test pre-evaluation, a full test evaluation was carried out by the SmartWood Program to determine if the CNNF management meets the requirements of the SmartWood program and the FSC certification standards. In addition, to the test evaluation by SmartWood, PricewaterhouseCoopers (PwC) is conducting a parallel test evaluation of the CNNF using the Sustainable Forestry Initiative (SFI) standards and auditing system. These two test evaluations have been completed concurrently with a single, merged audit team.

This report presents the findings of an independent test evaluation conducted by a team of specialists representing the SmartWood Program of the Rainforest Alliance. The purpose of the test evaluation was to assess the ecological, economic and social sustainability of CNNF forest management using standards defined by the FSC. Specifically, this test evaluation has been conducted using FSC Lake States Regional Standards, FSC-U.S. Department of Defense (DOD)/Department of Energy (DOE) Standards and Additional Considerations developed by SmartWood specifically for the CNNF test evaluation.

This report contains four main sections of information and findings and several appendixes. The entire report plus Appendixes I and II will become public information about the forest management operation that may be distributed by SmartWood to interested parties. The remainder of the appendixes are confidential, to be reviewed only by authorized SmartWood staff and reviewers bound by confidentiality agreements.

The purpose of the SmartWood Program is to recognize conscientious land stewardship through independent evaluation of forestry practices.

As a test evaluation, and because the USDA Forest Service has not met the prerequisites of the FSC-US Federal Lands Policy for pursuing FSC certification in the United States, the findings contained in this report are not determinations of conformance with FSC requirements as would be reported for a landowner qualified to seek certification under the FSC program. The USDA Forest Service and any other party may not: (a) use the names, logos, seals, certification marks or trademarks, or evaluation systems or procedures, of the contracting firm(s) or the FSC certification program for any purpose whatsoever, including, without limitation, the marketing, sale or promotion of any forest products; or (b), make any claim of conformity or near conformity with FSC requirements or any portion thereof, or any other operation, until and unless a certificate is awarded by an FSC accredited firm subject to a qualified FSC certification assessment.

**FSC certification is explicitly outside the scope of this project.**

# 1. SCOPE OF THE EVALUATION

## 1.1. Scope of the evaluation

The following text was modified from the Preface of the CNNF Final Environmental Impact Statement (2004):

*The Chequamegon-Nicolet National Forests cover 1,522,485 acres in Wisconsin's 'North Woods'. Since 1993, the two Forests have been administered as one unit and the forest plan revision process has been accomplished jointly.*

*Both Forests were established by Presidential proclamation in 1933 and were originally made up of largely abandoned and tax delinquent land that was acquired by the Federal Government under the authority of the Weeks Act of 1911. The Forests' boundaries encompass National Forest System (NFS) lands within 11 different Wisconsin Counties: Ashland, Bayfield, Florence, Forest, Langlade, Oconto, Oneida, Price, Sawyer, Taylor, and Vilas.*

*There are five Ranger Districts on the Forests. Three of the Ranger Districts—Great Divide (384,000 acres), Medford-Park Falls (282,000 acres), and Washburn (205,000 acres)—are on the Chequamegon land base of the Forests. On the Nicolet land base there are two Ranger Districts: Lakewood-Laona (354,000 acres) and Eagle River-Florence (330,000 acres). Each Ranger District maintains an office in the communities with which they share their names except Great Divide, which has offices in the communities of Glidden and Hayward. The Argonne Experimental Forest and Oconto River Seed Orchard are also found on the Nicolet land base.*

*The Chequamegon-Nicolet National Forests are composed of four separate contiguous ownership units: the Medford Ranger District, the Park Falls Ranger District, the Washburn/Great Divide Ranger Districts, and the entire land base of the Nicolet National Forest. The two largest units—the Nicolet National Forest and the Washburn and Great Divide Districts of the Chequamegon—are 662,000 and 576,000 acres, respectively. Private parcels of land are scattered within the boundaries of the National Forests. Multiple Use management leads to a multitude of goods and services provided by the Forests. Opportunities are provided for motorized and non-motorized recreation. Dozens of campgrounds provide opportunities for lakeside recreation. Many more lakes and rivers are accessible at boat and canoe landings. Sub-surface mineral extraction is currently not occurring, although there is the potential for mineral resource extraction to occur on CNNF lands. A diverse range of forest products, including non-timber forest products (e.g., balsam boughs, club moss), game, recreation, and timber products, are important to local culture and the economy.*

See more detailed information about the FMO and areas covered by the certificate in Appendices I and II.

## 1.2. Exclusion of areas from the scope of evaluation

CNNF did not exclude any areas under its management from the scope of the test evaluation.

## 2. TEST EVALUATION PROCESS

### 2.1. Standard Used for the Test Evaluation

The test evaluation was carried out using an integrated standard developed specifically for this project. This integrated standard is comprised of: 1) the applicable FSC regional standard; 2) the FSC-U.S. Indicators for U.S. Department of Defense (DOD) and Department of Energy (DOE) forests; and, 3) a set of “Additional Considerations” that were developed by SmartWood as a distinct element of this test evaluation. The FSC Regional Forest stewardship standard was merged with the FSC-US DOD/DOE standard and the 19 “Additional Considerations” to form a single standard. This merged standard was used by the SmartWood/PwC test evaluation team and is provided in Appendix III of this report.

The applicable FSC regional standard is the Final Lake States-Central Hardwoods (USA) Regional Forest Stewardship Standard (Version LS V3.0, dated February 10, 2005). These indicators are used to evaluate all forest management operations attempting to achieve FSC Forest Management certification in the Lake States and Central Hardwood Region of the US. Indicators that are associated with the FSC Lake States Region and Central Hardwood Region standards are listed throughout the report in outline fashion without a prefix (e.g. 1.3.a, 6.3.a.4, etc.). For The Lake States Central Hardwood region, indicators 4.4.e, 5.6.a, 6.2.a, and criterion 6.4 are considered fatal flaws. This means failure to meet these indicators or criterion will preclude a determination of conformance with the standard.

The FSC-U.S. Indicators for U.S. Department of Defense (DOD) and Department of Energy (DOE) forests (draft, dated February 25, 2003) used in the test evaluation are currently the only FSC certification standards approved for federal lands in the United States. The FSC-U.S. Indicators for U.S. Department of Defense and Department of Energy are identified in this report with the letters “DOD/DOE” (e.g. 6.3.b. DOD/DOE 1). The DOD/DOE Indicators were developed in conjunction with the FSC-U.S. Policy on Federal Lands, which was adopted by the FSC U.S. Board of Directors on February 25th, 2003. In the U.S., federally-owned forestlands must first meet the threshold standards of the FSC-U.S. Federal Lands Policy before certification can proceed. At this time, U.S. National Forests have not met the FSC-U.S. Federal Lands Policy and standards specific to the USDA National Forest System have not yet been developed by the FSC. The DOD/DOE indicators are included in this test evaluation at the request of The Pinchot Institute for Conservation and the U.S. Forest Service.

A total of 19 “Additional Considerations” have been developed to address any existing gaps in the standards relative to the unique aspects of the forest management of the CNNF. These special concerns relate to perceived limitations of the FSC standards [FSC Lake States and Central Hardwood Region Standards and FSC DOD/DOE standards] for evaluating CNNF forest management operations. Additional Considerations for the CNNF were developed through a process that began with the adoption of 17 Additional Considerations used in June 2006 for a similar test evaluation of the Allegheny National Forest (ANF) in Pennsylvania. In order to tailor these Additional Considerations to fit the CNNF, an expert panel of six regional resource professionals was asked to provide comment on the 17 draft Additional Considerations used for the ANF test evaluation, and also to identify any existing gaps in the standards relative to the unique aspects of the forest management of the CNNF. As a result of this cumulative process, 10 Draft (ANF) Additional Considerations were modified, one was deleted and three new Additional Considerations were identified resulting in 19 CNNF Additional Considerations. The Additional Considerations that were developed specifically for this project are identified with the prefix “AC” (e.g. AC 6.3.b.1).

The revised draft CNNF Additional Considerations were then provided to a broader group of targeted stakeholders in October 2006. Stakeholders were asked through a questionnaire to first identify key issues relating to the management of the CNNF, and then to provide input on the applicability and adequacy of the FSC standards to address any considerations that are unique to the National Forest System. These special concerns relate to perceived limitations of the FSC standards [FSC Lake States and Central Hardwood Region Standards and FSC DOD/DOE standards] for evaluating CNNF forest management operations.

SmartWood compiled all input received as described above and evaluated these special concerns to determine whether they should be used as Additional Considerations for the CNNF. Draft Additional Considerations were then subjected to an internal review by SmartWood staff and the SmartWood auditors. SmartWood evaluated CNNF's performance against these "Additional Considerations" in a manner identical to that for all other indicators included in the test evaluation with the exception that Corrective Action Requests (CARs) were not issued for "Additional Considerations."

## 2.2. Test Evaluation team and qualifications

**Dan M. Pubanz (SmartWood Lead Auditor):** M.S. (1988) and B.S. (1985) in Forestry, University of Wisconsin-Madison. Consulting forester since 2003. Additionally, 16 years of experience in public land management with responsibility for all pre-harvest activity on a 250,000-acre landbase in Wisconsin, which was FSC-certified for 10 years. Experienced in silviculture, private and public land management issues, FMP development, and forest management planning. Since 1999, extensive experience in FSC auditing of businesses, forest management organizations, and public lands in the Midwest and Northeast US; performed over 40 FSC audits or assessments, eight as Team Leader.

**Donald R. Taylor, CF (PricewaterhouseCoopers Lead Auditor):** SAF Certified Forester, Senior consultant and lead auditor for PwC, based out of Greenville, South Carolina. M.S. in forestry and MBA. Thirty years of field experience; has led numerous SFI audits for PWC for clients such as American Tree Farm System, Georgia Pacific, Boise, Forest Investment Associates, John Hancock Timber Resource Group, Plum Creek Timber Company, Willamette Industries, Westvaco, and the Stimson Lumber Company. Certified ISO 14001 EMS lead auditor. Prior to this work he worked for two major forest products companies as an operations manager, forester and vice president.

**Stephen C. Grado, PhD, CF/CFA (Socio-economist):** SAF Certified Forester/Certified Forest Auditor, Fellow Professor. Education: PhD in Forest Resources 1992, MS in Forest Resources and Operations Research 1984, BS in Forest Science 1979, The Pennsylvania State University, State College, PA; BA Political Science, Villanova University, Philadelphia, PA. Experience: Professor, Mississippi State University Department of Forestry; Society of American Foresters Certified Forester and Certified Forest Auditor. Dr. Grado has served as social assessor on 12 SmartWood pre-assessments and assessments, as an auditor for several forest management and chain-of-custody audits/assessments, and has also served as a peer reviewer of FSC certification reports. He also served as a member of a forest project monitoring team auditing under SFI standards.

**Kevin R. Russell, Ph.D. (Wildlife Ecologist)** – Certified Wildlife Biologist, Professor. Education: Ph.D. in Forest Wildlife Ecology in 2000 and MS in Zoology 1996 Clemson University, BS in Zoology 1991 University of Idaho. Experience: 14 years as a wildlife researcher and manager. Current position is Professor, University of Wisconsin – Stevens Point. Prior to this position he worked as a wildlife research biologist and manager for a major forest products company in Oregon. Dr. Russell has served as the wildlife ecologist on several SmartWood forest management assessments and also has served as an assessment peer reviewer.

**John Kotar, PhD (Forest Ecologist):** Senior Research Scientist, Department of Forest Ecology and Management, University of Wisconsin-Madison (since 1986). Ph.D. forest ecology 1972, University of Washington; assistant professor, ecologist/silviculturist, Department of Forestry, Michigan Technological University (1979-86); assistant professor, plant ecology, Department of Biology, University of Minnesota-Duluth (1972-79). SAF Certified Forester 2002.

## 2.3. Report peer reviewers

**Lee Frelich, Ph.D.** Education: Ph.D. in Forestry, 1986, specialty Forest Ecology, minor in applied statistics, University of Wisconsin-Madison; B.S. in Bacteriology, 1980; B.S. in Botany, 1979. Experience: Research

Associate, University of Minnesota, Department of Forest Resources, College of Natural Resources; Senior Member of the Graduate Faculty in Forestry, Ecology, and Conservation Biology Programs; Director, The University of Minnesota Center for Hardwood Ecology. Areas of expertise include: biodiversity and forest management; boreal forest dynamics; disturbance ecology; ecosystem management in forests; hardwood forests (oak and maple); modeling of growth and dynamics of vegetation and landscapes; and, old growth forest and natural area evaluation, restoration and management.

**Donald W. Floyd, Ph.D.** Education: Ph.D. Renewable Natural Resources, 1988, University of Arizona; M.S. Environmental Communication, 1976, University of Wisconsin-Madison; B.A. Journalism, Humboldt State University 1974. Experience: Professor of Forest Policy and Chair, Canadian Institute for Forest Policy and Communication, University of New Brunswick. Fellow, Society of American Foresters. Co-Editor, Journal of Forestry. Areas of expertise include forest policy, public participation and environmental communication.

## 2.4. Test Evaluation schedule

Date	General Location* (main sites)	Main activities
September 13-14, 2006	CNNF Rhinelander Supervisor's Office	Informational session by SW / PwC for CNNF staff; Test Pre-evaluation
September-October, 2006	Email, phone	Test evaluation planning; field site selection
August – October, 2006	Email	Development of 19 Additional Considerations through formalized consultation with SmartWood auditors; a panel of six regional natural resource experts; and targeted stakeholders. Input provided through these consultative measures was reviewed by SmartWood staff to finalize the Additional Considerations.
September 28, 2006, October 2, 2006 October 4, 2006	Website, email, mail	Public briefing notice posted on the SmartWood website and distributed to several hundred local, regional and national stakeholders via email and postcards.
September 28, 2006 October 4, 2006	Email, mail	Stakeholder mail survey sent to CNNF employees and other stakeholders.
October 29, 2006	Rhinelander, WI hotel	Test evaluation team meeting
October 30, 2006	Eagle River-Florence District Office	Introductory meeting, review of evaluation process, final planning for field visits, office visits
October 30, 2006	Eagle River-Florence District	Site visits/field evaluations
October 31, 2006	Lakewood-Laona District	Site visits/field evaluations
October 31, 2006	Rhinelander Supervisor's Office	Office visits
October 31, 2006	Rhinelander Holiday Inn	Public meeting/stakeholder consultation
November 1, 2006	Medford-Park Falls District	Site visits/field evaluations
November 1, 2006	Park Falls Supervisor's Office	Office visits
November 2, 2006	Great Divide District	Site visits/field evaluations
November 2, 2006	Northern Great Lakes Visitor's Center	Office visits/staff interviews; public meeting/stakeholder consultation
November 3, 2006	Washburn District	Site visits/field evaluations
November 4, 2006	Ashland, WI hotel	Test evaluation team meeting
November 4, 2006	Northern Great Lakes Visitor's Center	Closing meeting with CNNF staff; debriefing on preliminary findings
November, 2006	E-mail, mail, phone	Stakeholder consultation

Total number of person-days used for the test evaluation: 47.5 days.

\* Detail on sites visited provided in Appendix VI.

## 2.5. Evaluation strategy

This project began with a test pre-evaluation, as detailed in a report entitled “Forest Management Test Pre-Evaluation Report for: Chequamegon-Nicolet National Forest,” draft submitted to CNNF on October 9, 2006. During this session, the lead auditors from SW and PwC and the SmartWood U.S. Region Manager (Dave Bubser) conducted an informational orientation session for CNNF staff members focused on describing the project and reviewing processes and procedures for the test evaluation. This session was attended by 11 CNNF staff from the Supervisor’s Office.

From mid-September to mid-October, 2006, the SW Lead Auditor worked with the CNNF Natural Resources Group Leader and the CNNF Forest Silviculturist on selecting the site visit locations, to include both vegetation (i.e., timber) management and other management activities on each District of the Forest. For timber sales, the sample set was based on open timber sales, of which there were 97 across the Forest. Open sales were used in order to evaluate CNNF’s most current management strategies and practices. These sales were covered by project analyses dating between 1996 and 2004. Most harvest activity within these sales has occurred over the past five years. No sales have been conducted under the 2004 Land and Resource Management Plan (LRMP).

CNNF was asked to include the following information for each of these sale units: District, Management Area, silvicultural system, planting, presence of aquatic/cultural/RT&E/RFSS resources, soil types, active harvest operations, and recreation trails. From this list, the SW Lead Auditor selected 24 timber sales that contained a range of silvicultural systems (especially including even-aged management) and the presence of aquatic/cultural/RTE resources. Samples were determined for every District. After discussions with CNNF staff, this list was further refined to be logistically feasible (i.e., sites were accessible within the timeframe of the test evaluation) and included the final 17 sales used for the test evaluation. Within the 17 sales, 31 purchase units (different operational units) were evaluated.

CNNF supplied a listing of non-timber projects that had been conducted over the previous three years, which included over 110 separate projects. The SW Lead Auditor and CNNF staff developed the site visit list (n=25) to include wildlife, fisheries, non-native invasive species (NNIS), trails, cultural resources, and prescribed burn projects that were feasible to visit during the evaluation period.

At each timber sale purchase unit visited, discussions were conducted either individually or as a group with the CNNF staff members responsible for implementing the management activity at that site (such as the District silviculturist, sale administrator, and lead marker). Where necessary, CNNF non-timber resource specialists were consulted on site. At non-timber sites, discussions were conducted with appropriate District specialists. Both District staff and Supervisor’s Office staff were present at each site, which often totaled in excess of a dozen people. Additionally, observers from the USDA Forest Service’s national and regional offices, the PIC, and the Wisconsin Department of Natural Resources were also present. High-risk areas within purchase units were specifically visited to evaluate the effectiveness of mitigation measures. Additionally, when traveling between sites, auditors continued to discuss issues related to the Standard with CNNF staff. At the end of each day, the SW/PwC team summarized the site visits and presented initial findings on strengths and weaknesses relative to the Standard to the CNNF staff that were present in the field.

The SW and PwC Lead Auditors worked in the field throughout the evaluation, with the exception of time spent reviewing GIS and forest inventory systems in the office. The forest ecologist or the wildlife ecologist, or both, were present in the field during the evaluation with the exception of November 1. This gap was due simply to the need to schedule two people while reducing travel time to the Forest. The social assessor spent 1.5 days in the field and the remainder of the time at various offices working directly with CNNF staff to learn about worker relations and various other elements of the management system.

## List of management aspects reviewed by test evaluation team:

Type of site	Sites visited	Type of site	Sites visited
Planned harvest site	7	Skid trails	29
Active harvest site	3	Boundary lines	4
Completed harvest site	19	Borrow pits	2
Thinning/selection	14	Hiking trails	3
Shelterwood	3	Forest roads (old/new)	15+
Clearcut	3	Road construction	4
Salvage	7	Riparian buffer zone	5
Special management area	5	Wetlands	9
Endangered species	2	Wildlife management	14
Non-native species control	3	Forest road/stream crossing	4+
Prescribed burn	6	ATV trail (designated)	2
Chemical use	1	Recreational site	7
Landings	22	Buffer zone	6

## 2.6. Stakeholder consultation process

Stakeholder consultation was used to supplement information relative to CNNF's performance with respect to the FSC Lake States and Central Hardwood Region Standards combined with the FSC US DOD/DOE federal land indicators and the Additional Considerations used in the test evaluation. It was also used as an effective means to identify difficult or controversial forest stewardship issues and gain an understanding of how stakeholders believe issues should be resolved. Stakeholder consultation occurred prior to, during, and after the on-site visit.

Prior to the test evaluation, provisional "Additional Considerations" were submitted to an expert panel of six individuals with regional expertise in a range of natural resource disciplines. This expert panel was asked to review and comment on the provisional Additional Considerations. Input provided by the expert panel was meaningful and robust. Following the consultations with the expert panel, SmartWood developed an "Additional Considerations" questionnaire designed to solicit input from targeted stakeholders regarding the applicability, and any perceived limitations unique to the USDA Forest Service and CNNF operating environment, relative to the FSC standards being used. This questionnaire was distributed in October 2006 to 104 individuals known or expected to have significant knowledge and interest in the forest management of CNNF and/or of national forests in general. These stakeholders represent a diverse group with a local and regional bias but also include several key national organizations. Stakeholders were asked to identify 3 – 5 key issues on the CNNF and then to indicate whether these key issues are adequately addressed by the FSC regional standards, combined with the FSC DOD/DOE standards and the proposed Additional Considerations. Two questionnaires were returned for a response rate of 2%. Comments from this effort were considered in the development and revision of "Additional Considerations". These Additional Considerations were incorporated into the test evaluation report and evaluated as indicators.

During the test pre-evaluation meeting, the SmartWood lead auditor discussed the stakeholder consultation process with CNNF staff. An overview was given by the auditor on the use of stakeholder consultations within the full evaluation process. The purpose of stakeholder consultation is threefold: 1) to ensure that the public is aware of and informed about the evaluation process and its objectives; 2) to assist the evaluation team in identifying potential issues; and, 3) to provide diverse opportunities for the public to discuss and act upon the findings of the evaluation. Stakeholder inputs were used as supporting evidence or verification during the evaluation process, to provide the evaluation team with additional perspectives on the CNNF forest

management, and to point toward issues that need further exploration. In the test evaluation report, stakeholder inputs will be used in: 1) findings; 2) a table summarizing stakeholder comments received; and 3) the confidential Appendices on stakeholder contact and the nature of the consultations (e.g., on-site visit, on-site interview, mail survey, stakeholder meetings, e-mail notification, telephone interview).

Prior to, and during, the test pre-evaluation, the team requested CNNF to provide electronic lists (i.e., names and addresses, names and e-mail addresses) containing stakeholders from the following categories: federal, state, county, and local government officials and employees; Native American Tribes and their representatives; their forest plan mailing list; timber sale purchasers; construction contractors; forestry services contractors; and adjacent landowners. After the pre-evaluation, auditors researched additional stakeholders that were added to the contact list. In addition, SmartWood staff and the social assessor developed the stakeholder public notice, and cover letter and mail-in survey used in the test evaluation. This public notice was reviewed, pre-distribution, by the CNNF, SmartWood, and PwC. The stakeholder list contained 481 entries. In addition, CNNF developed an employee stakeholder list (n=264).

The stakeholder public notice, cover letter, and mail survey were distributed by mail in early October 2006. All stakeholder lists were surveyed in their entirety with the exception of the CNNF's Forest Plan list (n=1,829), where a random sample of 183 individuals, agencies, and organizations were chosen. SmartWood distributed a public briefing paper to 1,000 individuals, agencies, and organizations from the Forest Plan list (separate from the 183 surveyed) prior to the test evaluation explaining the process. This public notice was also posted on the SmartWood Web site ([www.smartwood.org](http://www.smartwood.org)). The CNNF distributed the public notice to their employees. The CNNF requested that they distribute the public notice, cover letter, and survey to their own employees.

The mail survey questionnaire was delivered to all 481 entries on the stakeholder list plus all 264 CNNF employee stakeholders (n=745). A total of 115 surveys were returned to the social assessor. The survey return rate, after accounting for non-deliverables (n=33), was 16.2%. The responses received from this survey are not considered to be representative of "public opinion" regarding the management of the CNNF. Statements made, for example, in section 3.1 are representative only of the 150 stakeholders surveyed and other stakeholders interviewed or providing input through other venues. The purpose of stakeholder consultation measures undertaken within the context of third party forest auditing is to evaluate conformance to the standards. Survey results were used as supplemental information, to identify potential issues that may not have otherwise been discovered, or to reinforce observations made by the auditors through other avenues of evidence gathering.

An attempt was made to enhance the process with two public stakeholder meetings which took place during the team's visit. One meeting was held from 6:30 – 8:30 PM on Tuesday night, October 31 at the Holiday Inn in Rhinelander, Wisconsin. A second meeting was held from 6:30 – 8:30 PM on Thursday night, November 2nd at the Northern Great Lakes Visitor Center in Ashland, Wisconsin. The meetings were advertised in the local newspapers and on radio. Stakeholder surveys and a sign-in sheet were posted at the meeting entrance. The meetings were attended by 1 and 0 individuals, respectively. The stakeholder input was summarized by the team and incorporated into the evaluation report.

During and after the test evaluation, the team also conducted meetings and individual interviews with CNNF employees; contractors; peer organizations and businesses; local citizens and community representatives; conservation organizations; neighboring landowners; and other interested or relevant parties to ensure the test evaluation addressed stakeholder concerns and interests in the FMO's operations. Individual stakeholders were contacted either in person, over the telephone, or by e-mail. For example, e-mail inquiries were made to mail survey respondents (n=33) who requested to be contacted by the team.

Of the 264 CNNF employees contacted, three did not want to be listed in the appendix titled "List of FMO Staff Consulted." Of the 481 external stakeholders contacted via the mail survey, five did not want to be

listed in the appendix titled "List of other Stakeholders Consulted." For the latter, one could not be found on the stakeholder lists.

<b>Stakeholder Type (NGO, government bodies, local inhabitant, contractor etc.)</b>	<b>Stakeholders informed (#)</b>	<b>Stakeholders consulted or providing input (#)<sup>b</sup></b>
Academics	10	31
Chambers of Commerce	2	0
CNNF employees	264	124
County Forestry Administrators	32	3
County Government	3	3
Federal agencies	13	6
Forest industry, consultants, and contractors	95	81
Libraries	8	0
NGOs	30	23
Other industries	34	1
Politicians	2	3
Recreation-related	12	80
State Agencies	6	1
Towns	10	0
Tribal Interests	32	5
Unknown Stakeholders <sup>a</sup>	222	172

<sup>a</sup>Most of these stakeholders were from the Forest Plan list and included landowners and private citizens not owning land.

<sup>b</sup>Stakeholders providing inputs included those directly identified through interviews and those who provided inputs anonymously through the mail survey, thus leading to duplications. In many cases, stakeholders identified themselves as belonging to more than one grouping. In some cases, inputs were greater than contacts because the auditors received information many who were no on any contact list.

### 3. TEST EVALUATION FINDINGS AND OBSERVATIONS

#### 3.1. Stakeholder comments received

The stakeholder consultation activities were organized to give participants the opportunity to provide comments according to general categories of interest based upon criteria used for the test evaluation. The table below summarizes the issues identified by the test evaluation team with a brief discussion of each based upon specific interview and/or public meeting comments.

For the sake of clarity and transparency, all references made to stakeholder survey results must be taken in proper context. A total of 712 survey questionnaires were delivered to a wide range of stakeholders, including CNNF employees. Of these 712 surveys delivered, a total of 115 responses were received. The percentages reported in the table below, and throughout the report, express the corresponding proportion of the 115 survey respondents. All surveys received have been collapsed into one population rather than segregated by stakeholder category. Survey responses are not considered to be representative of the broader public opinion on CNNF management or on any specific issue addressed by the questionnaire. Rather these collective responses are viewed as representative of only the 115 individuals responding to the survey. Survey results have been used by the SmartWood auditors to enhance their evaluation of conformance to the forest management standards used for this test evaluation of CNNF.

FSC Principle	Stakeholder comment	SmartWood response
<b>P1: FSC Commitment and Legal Compliance</b>	<ol style="list-style-type: none"> <li>Stakeholders were satisfied with CNNF’s compliance with laws and regulations. Responses from 115 stakeholders returning survey questionnaires are consistent with other stakeholder comments on this issue (86% replying as satisfied).</li> <li>Stakeholders returning completed survey questionnaires (115 returned of 712 delivered) were generally satisfied with CNNF’s measures to prevent illegal and unauthorized activities in the forest. (69 -76% satisfied). However, satisfaction with CNNF’s law enforcement capability dropped to 53% of those responding, primarily due to dissatisfaction with enforcement of ATV regulations.</li> </ol>	<ol style="list-style-type: none"> <li>CNNF was found to be well aware of pertinent laws and regulations and took action to ensure compliance. There was no evidence of consistent, intentional non-compliance with laws and regulations.</li> <li>CNNF’s law enforcement capabilities for their 1.5 million acre landscape are limited. CNNF needs to re-evaluate their ability to enforce laws and regulations sufficient to protect against resource damage (CAR 2/06). The issues of both proper and improper ATV/ORV use will continue to require CNNF to explore appropriate options for future designation of non-motorized and motorized recreational areas.</li> </ol>
<b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b>	<ol style="list-style-type: none"> <li>Recreational opportunities on the CNNF are diverse enough to appeal to a large number of visitors. Two-thirds of the 115 mail survey respondents were satisfied with this activity. The NVUM also verified visitor satisfaction. Tribal contacts were satisfied with hunting, fishing, and gathering</li> </ol>	<ol style="list-style-type: none"> <li>The CNNF meets the FSC standards with respect to providing both customary recreational opportunities and facilitating customary forest uses (e.g., hunting, camping, hiking, tribal rights, NTFP utilization). As an example over 73% of survey respondents were satisfied with</li> </ol>

	<p>rights on the CNNF.</p> <ol style="list-style-type: none"> <li>No evidence was found, either from CNNF interviews or through stakeholder engagement (i.e., stakeholder meeting, on-site interviews, mail or e-mail surveys), that disputes of substantial magnitude involving tenure and use rights exist.</li> <li>Fifty-five percent of the 115 mail survey respondents expressed dissatisfaction with management's handling of motorized access to areas with road closures; 63% expressed dissatisfaction with ATV and other motorized recreational use; and 72% were dissatisfied with off highway vehicle use and management. Dissatisfaction on these issues was also expressed through stakeholder interviews.</li> </ol>	<p>NTPF management.</p> <ol style="list-style-type: none"> <li>Claims of significant disputes with the CNNF related to tenure or use rights were found to be minimal as expressed by the CNNF and through stakeholder consultations. Boundary line issues do occur, but they are addressed appropriately and in a timely manner.</li> <li>It was apparent that there is a problem here, with there being a near even split on this issue. Some are advocating enhanced motorized recreational use and others are seeking to limit or eliminate it. The latter see it as disruptive to historical and natural resources, as well as being a detriment to local residents. Enforcement of ATV regulations is limited due to less than sufficient law enforcement resources (see CAR 2/06).</li> </ol>
<b>P3 – Indigenous Peoples' Rights</b>	<ol style="list-style-type: none"> <li>Of the 115 stakeholders returning survey questionnaires, 81% felt that CNNF adequately addressed historical and cultural issues (satisfied with historical and cultural issues related to site detection, protection, public access, and interpretation). However, one Tribal representative was concerned that insufficient resources were allocated to cultural resource management.</li> <li>Interviews with Tribal representatives found that they want a summarized version of materials sent to the tribes along with current materials. Tribal contacts also want to see more personal consultations with key members on both sides addressing common issues.</li> </ol>	<ol style="list-style-type: none"> <li>Interviews with the CNNF archaeologist and historical and cultural site visits provided verification that CNNF is meeting the FSC standards with respect to tribal rights and protection of historical Tribal sites and resources.</li> <li>CNNF could revise their approach to Tribal communications (see OBS 2/06).</li> </ol>
<b>P4: Community Relations &amp; Workers' Rights</b>	<ol style="list-style-type: none"> <li>Several employees expressed dissatisfaction and demoralization with the introduction of "Enterprise Teams", where activities involved with these groups were viewed as time consuming, inefficient, and insensitive to the current</li> </ol>	<ol style="list-style-type: none"> <li>Employee dissatisfaction regarding Enterprise Teams can affect overall morale and quality of work and is an issue that needs to be taken seriously by the USDA Forest Service (OBS 3/06).</li> </ol>

	<p>workforce.</p> <ol style="list-style-type: none"> <li>Many stakeholders expressed that community and industry needs (e.g., supplying a needed harvest of wood) are being neglected due to preferences given to environmentalists and the desires of tourists. Over 60% of the 115 mail survey respondents, coupled with stakeholder comments and interviews, expressed dissatisfaction with CNNF's timber harvesting levels. This issue alone was responsible for 57% of 115 mail survey respondents stating that the CNNF needs to improve their overall forest management.</li> <li>Public relations and communications were viewed favorably by the 115 stakeholders responding to the survey questionnaire, as 73% felt satisfied with this activity. Over 79% of the 115 mail survey respondents were satisfied with public notification of management activities and 62% were similarly satisfied with CNNF's means for addressing public inquires on forest management.</li> </ol>	<ol style="list-style-type: none"> <li>As a public entity, the CNNF has a mandate to accommodate all individuals and groups who claim to have a stake in the well being of the forest. However, the CNNF is not meeting their stated annual harvest goals.</li> <li>The CNNF spends a good deal of time interacting with the public. In terms of some disagreements (e.g., the timber harvest), total resolution to the satisfaction of all parties is an unreasonable expectation since appeals and lawsuits are not within the CNNF's control. With the resources available to the CNNF staff, they are doing an admirable job in terms of meeting FSC standards regarding public communication.</li> </ol>
<b>P5: Benefits from the Forest</b>	<ol style="list-style-type: none"> <li>The majority (61% - 77%) of the 115 stakeholders responding to the survey questionnaire raised concerns regarding the timber harvesting activities on the Forest. Most comments were not in favor of the reduced harvest levels currently occurring on the Forest.</li> <li>Stakeholders expressed satisfaction with many of the recreational and NTFP-related management activities on the forest. For example, 66% of the 115 stakeholders responding to the survey questionnaires were satisfied with the former and 73% with the latter.</li> </ol>	<ol style="list-style-type: none"> <li>Current harvest levels on CNNF are below ASQ, which will likely cause some of the socio-economic and forest management goals that generated the ASQ to be unmet. (CAR.4/06).</li> <li>SmartWood concurs that CNNF works to provide suitable recreation and NTFP harvest on the Forest.</li> </ol>
<b>P6: Environmental Impact</b>	<ol style="list-style-type: none"> <li>For slightly more than half (51.6%) of 115 stakeholders responding to the survey, Roadless Area designation was viewed as</li> </ol>	<ol style="list-style-type: none"> <li>CNNF is in compliance with the Roadless Area Conservation Rule. As of the date of the test evaluation, CNNF has not received a petition</li> </ol>

	<p>needing improvement. Responses were mixed between too much and too little roadless area.</p> <ol style="list-style-type: none"> <li>2. CNNF's protection of rare, threatened, and endangered species and communities was viewed favorably by more than 78% of the 115 stakeholders responding to the survey.</li> <li>3. Several stakeholders indicated a concern that CNNF did not sufficiently monitor species of concern that are currently not protected by state or federal law.</li> <li>4. Some stakeholders commended CNNF for working cooperatively with other agencies, technical experts, landowners, and others regarding protection of RT&amp;E species and communities.</li> <li>5. Wildlife habitat management was viewed favorably by 58% of the 115 stakeholders responding to the survey.</li> <li>6. Several stakeholders noted a reduced focus on aspen management.</li> </ol>	<p>for state-specified management of inventoried roadless areas under the State Petitioning Rule.</p> <ol style="list-style-type: none"> <li>2. SmartWood concurs.</li> <li>3. CNNF's LRMP addresses over 20 RFSS species that are not yet listed as RT&amp;E. CNNF is found to be in conformance with the Standard on this issue.</li> <li>4. SmartWood agrees that CNNF regularly and actively engages in cooperative efforts to protect RT&amp;E species and communities. CNNF follows the legally-mandated NEPA process to evaluate, minimize, and mitigate environmental impacts of its activities.</li> <li>5. SmartWood concurs.</li> <li>6. The LRMP forecasts a 2% reduction in aspen acreage over the next 10 years and a 36% reduction in 100 years, consistent with the goal of developing a better representation of other forest cover types. Enhancing cover type diversity is consistent with the FSC Lake States Standard.</li> </ol>
<p><b>P7: Management Plan</b></p>	<ol style="list-style-type: none"> <li>1. Mail survey respondents were evenly divided regarding the quality of the forest management plan documents.</li> </ol>	<ol style="list-style-type: none"> <li>1. CNNF has produced a thorough forest management plan document, along with numerous additional documents, that fully describe management objectives and methods.</li> </ol>
<p><b>P8: Monitoring &amp; Assessment</b></p>	<ol style="list-style-type: none"> <li>1. While majorities of the 115 survey respondents favorably viewed CNNF's monitoring of forest, water, and wildlife resources, a large minority (approximately 40%) thought monitoring needed improvement. Typically, increased non-timber staffing levels and increased time allocations to non-timber projects were viewed as necessary by stakeholders.</li> <li>2. Stakeholders expressed concern that although data collected by CNNF were adequate for addressing timber-based</li> </ol>	<ol style="list-style-type: none"> <li>1. CNNF has developed numerous, effective monitoring protocols for a wide variety of forest resources, although several gaps were found in required monitoring (CAR 7/06). Ongoing monitoring of the social effects of CNNF's management practices could be strengthened (OBS 20/06).</li> <li>2. CNNF could improve their collection of ecologically-relevant long-term monitoring data, such as plant diversity (OBS 23/06).</li> </ol>

	resources, the types of data and frequency of monitoring were inadequate to address ecological characteristics of their forests.	
<b>P9: Maintenance of High Conservation Value Forest</b>	<ol style="list-style-type: none"> <li>Two-thirds of the 115 stakeholders responding to the felt that HCVFs were present on CNNF lands. Numerous suggestions for HCVFs were received.</li> <li>Stakeholders indicated that CNNF efforts to protect currently designated reserve areas such as old-growth forest were adequate, but attributes associated with HCVF's in non-reserve areas currently were inadequately protected.</li> </ol>	<ol style="list-style-type: none"> <li>CNNF has protected over 285,000 acres of areas consistent with the definition of HCVF as part of developing their current forest management plan. Stakeholder input regarding these areas was collected during plan development.</li> <li>Overall, protection of HCVFs on CNNF lands is relatively strong, however there is a deficiency related to several potential old growth stands whose status has not yet been formally designated (CAR 5/06).</li> </ol>
<b>P10 - Plantations</b>	None received.	None.

### 3.2. Main strengths and weaknesses

<b>Principle</b>	<b>Strengths</b>	<b>Weaknesses</b>
<b>P1: FSC Commitment and Legal Compliance</b>	<p>Laws and regulations are listed in the LRMP and fully codified in USDA Forest Service Manuals (FSMs) and Forest Service Handbooks (FSHs).</p> <p>There is no evidence of consistent, intentional non-compliance with laws and regulations.</p>	<p>CNNF has not demonstrated a long-term written commitment to adhere to the FSC Principles and Criteria (CAR 1/06).</p> <p>CNNF staff is not familiar with CITES or the Convention on Biological Diversity (OBS 1/06)</p>
<b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b>	Clear evidence of most long-term forest use rights to the land (e.g., land title, customary rights, and lease agreements) were demonstrated to the team and were found to be clear and readily accessible.	CNNF's law enforcement capabilities for their 1.5 million acre landscape are limited. CNNF needs to re-evaluate their ability to enforce laws and regulations sufficient to protect against resource damage (CAR 2/06).
<b>P3 – Indigenous Peoples' Rights</b>	The CNNF Heritage Program staff makes continuous, systematic efforts to identify areas of cultural, historical, and/or religious significance.	Information provided to Tribes by CNNF is often not in a way that effectively meets the Tribes' needs. CNNF staffing and training need improvement to provide effective communication with Tribes (OBS 2/06).
<b>P4: Community Relations &amp; Workers' Rights</b>	Communities and their citizenry residing within, or adjacent to, the CNNF have unique opportunities for employment, training, and advancement.	CNNF could further consult with employees regarding centralization and outsourcing projects (OBS 3/06).

	<p>The CNNF provides a number of training opportunities for its employees to enhance their on-the-job skills and promote safety in the workplace.</p> <p>Periodic Safety and Health meetings are held forest-wide. Measures taken to ensure the safety and the well-being of employees are exemplary as would be expected for a federal entity.</p> <p>Services provided by the forest such as public education and outreach, recreational opportunities, economic benefits, and ecosystem-related outputs are exceptional. The Northern Great Lakes Visitor Center is a positive cooperative venture that greatly enhances natural resource education and outreach.</p> <p>CNNF employees are actively engaged in local community organizations and activities.</p> <p>CNNF expends significant effort on stakeholder meetings and consultations to solicit inputs and concerns in regard to forest management activities. An accessible appeals process to planning decisions is available.</p>	
<p><b>P5: Benefits from the Forest</b></p>	<p>CNNF develops a variety of timber sale types and sizes to provide work opportunities suited to the variety of logging businesses.</p> <p>CNNF produces a diversity of ecosystem goods and services (e.g., timber, pulpwood, recreation, water quality and quantity). The CNNF helps contribute to a diverse economy and has a sizable economic impact in the region.</p> <p>CNNF takes a proactive approach to maintain, enhance, and restore the value of forest resources such as watersheds, fisheries, and special habitat types.</p> <p>Based on field observation, waste, residual tree damage, and adverse soil impacts are well within commonly</p>	<p>Uncertainty regarding annual funding levels, combined with other factors, can leave CNNF without sufficient resources to fully implement the goals and objectives of the LRMP for managing and protecting the Forest (OBS 4/06).</p> <p>CNNF does not inventory non-timber forest products and has not developed allowable harvest levels for these products (CAR 3/06).</p> <p>CNNF does not have guidelines for woody debris retention (OBS 5/06).</p> <p>CNNF does not have definitions of acceptable residual tree damage (OBS 6/06).</p>

	<p>accepted levels.</p> <p>CNNF does not harvest within forested wetlands.</p> <p>Timber sale reviews are conducted annually by Supervisor’s Office staff.</p> <p>CNNF thoroughly reviewed the accuracy of the data used in developing allowable harvest levels and used suitable, detailed modeling constraints.</p>	
<p><b>P6: Environmental Impact</b></p>	<p>Assessment of current forest conditions, ecological functions, disturbance pathways, and special habitats is intensive and comprehensive.</p> <p>Current ecological conditions are appropriately compared to both historical conditions and desired future conditions within a landscape context to guide management direction.</p> <p>Potential short-term impacts and cumulative effects of environmental impacts are exhaustively evaluated for National Forest Lands.</p> <p>Multiple management options are developed and considered to achieve long-term desired future conditions and ecological functions of the forest.</p> <p>Extensive pre-management evaluations are made to determine the occurrence of and habitat conditions for rare, threatened, or endangered (RT&amp;E) species, Regional Forest Sensitive Species (RFSS), and other sensitive species and communities.</p> <p>Habitat management and conservation guidelines have been developed and consistently implemented for RT&amp;E, RFSS, and other sensitive species and communities.</p> <p>CNNF has identified Management Areas to match management objectives and activities to specific geographic areas based on historical conditions and disturbance regimes,</p>	<p>Potential effects of climate trends currently are not incorporated into landscape-level comparisons of historical, current, and/or future desired conditions (AC 6.1.3).</p> <p>Evaluations of potential short term and cumulative environmental effects of management activities typically are confined to National Forest Lands (AC 6.1.4).</p> <p>CNNF contractors appear to be only informally and irregularly trained on the identification of RT&amp;E and RFSS species and their habitats or procedures for reporting their detection (OBS 7/06).</p> <p>When significant time lags occur between field evaluation of RT&amp;E and RFSS species and project implementation, follow-up surveys typically are not conducted closer to the time of project initiation in order to confirm the presence or absence of such species (OBS 8/06).</p> <p>CNNF has not currently allocated funding for salvage areas that may experience future poor hardwood regeneration. CNNF is attempting to manage many even-aged, low-grade hardwood stands using uneven-aged systems, which could delay quality development on these sites (OBS 9/06).</p> <p>Given the reduced harvest levels, it appears to be in question whether CNNF will be able to meet the age</p>

	<p>current ecological characteristics, and environmental sensitivities.</p> <p>Proactive measures have been taken to identify and protect special areas for the purposes of adequate ecological representation, including old growth habitats and other ecological reference areas.</p> <p>The 2004 LRMP contains numerous Objectives to minimize damage to forest resources due to mechanized activity.</p> <p>The Region 9 Directive for Chapter 2 of the FSH 2509.18 contains detailed definitions of detrimental soil disturbance.</p> <p>CNNF has an active program to repair stream crossings that are causing erosion or fish passage problems.</p> <p>Extensive guidelines and methods have been implemented to eliminate and prevent the spread of NNIS.</p> <p>CNNF restricts herbicide use to controlling NNIS where 83% of the applications used glyphosate. Herbicides are not used in other aspects of forest management or in utility corridor maintenance by CNNF policy. Mowing and prescribed burning have been used to control interfering woody vegetation.</p> <p>The LRMP has a long-term strategy for reducing the deer herd size (and related adverse herbivory) by reducing suitable habitat over time through the development of more area of northern hardwood interior forest cover type.</p>	<p>class distributions and forest structure objectives defined in the LRMP (CAR 4/06).</p> <p>There is a long time lag between project analysis and harvest completion (OBS 10/06).</p> <p>CNNF does not consistently delineate vernal pool boundaries and does not have formal buffer width requirements (OBS 11/06)</p> <p>CCNF is not specifically aware of the FSC Policy regarding chemical pesticides. (OBS 12/06).</p> <p>CNNF's Emergency Preparedness Action Plan is still in draft form and not yet official policy (OBS 13/06).</p> <p>CNNF has not determined whether the potential old growth stands outside currently protected areas are in fact old growth (i.e., by composition, structure, and functionality) and warrant protected designation (CAR 5/06).</p> <p>Equipment cleaning clauses to prevent the spread of NNIS currently are limited to management activities within timber sale areas (OBS 14/06).</p>
<p><b>P7: Management Plan</b></p>	<p>The depth and detail of analysis that contributed to the 2004 LRMP is extraordinary for forest management, and the LRMP is a model of completeness. There are clear connections between the goals, objectives, standards and guidelines, treatment implementation, and subsequent monitoring.</p>	<p>CNNF planning documents do not address the mineral resources on the Forest, the status of the subsurface rights owned by entities other than CNNF, and the effects of this ownership on the Forest resource (CAR 6/06).</p> <p>CNNF harvest maps do not consistently show embedded wetlands</p>

	<p>Public input is sought for virtually all management proposals and planning documentation is readily available to the public.</p>	<p>and adjacent cover types (OBS 15/06).</p> <p>CNNF does not have a centralized database for tracking employee training (OBS 16/06).</p> <p>CNNF does not require woods workers to be trained (OBS 17/06).</p> <p>CNNF does not require all pre-harvest meetings to be held on site (OBS 18/06).</p> <p>CNNF has not ensured that all timber markers are fully familiar with harvest machine access requirements (OBS 19/06).</p>
<p><b>P8: Monitoring &amp; Assessment</b></p>	<p>The LRMP provides quantifiable questions for establishing whether the LRMP Objectives are being met on the Forest, as well as documenting deviations from the plan and unexpected effects of management.</p> <p>CNNF is a partner with external entities in numerous research projects on the Forest and willingly facilitates research projects developed by external entities.</p> <p>CNNF quantitatively and extensively monitors for changes in major habitat elements and occurrence of RT&amp;E, RFSS, and other sensitive species and communities.</p> <p>CNNF has an extensive inventory system containing data on a wide array of forest resources.</p> <p>CNNF monitoring information is readily available in print or digital form on the CNNF website.</p>	<p>CNNF's FY05 monitoring was not complete (CAR 7/06) and on-going social effects (such as on forest industry employment) of CNNF management could be monitored more frequently (OBS 20/06).</p> <p>CNNF documentation does not clearly address the abundance, regeneration, and habitat conditions of non-timber forest products (CAR 8/06).</p> <p>CNNF does not measure tree grade or monitor tree grade change over time for those components of their forest for which published tree grades exist. As a result, in those areas where timber quality is a management variable of interest and timber quality is not superseded by other management goals, the effects of management on timber quality can be only vaguely ascertained (OBS 21/06).</p> <p>Linkages are not yet in place between all databases to allow efficient and consistent data management and analysis (OBS 22/06).</p> <p>CNNF does not consistently collect long-term monitoring data on ecologically-relevant forest attributes such as such as understory plant species composition and structure (OBS 23/06).</p> <p>CNNF does not conduct systematic</p>

		stand-level and forest-wide monitoring of wildlife den tree, snag, and coarse woody debris retention within timber harvest areas (OBS 24/06).
<b>P9: Maintenance of High Conservation Value Forest</b>	CNNF has identified, mapped, and protected a number of globally, regionally, and locally scaled HCVFs.  Descriptions of HCVFs, as well as the process by which they were identified, prioritized, and protected, are described in the Forest Plan.	CNNF has identified approximately 1000 acres of potential old growth that is not yet under a protected designation (CAR 5/06).  While formal five- and 10-year monitoring protocols are well defined, there is not a consistent approach to annually monitoring HCVF areas (CAR 9/06).
<b>P10 - Plantations</b>	Not Applicable	Not Applicable
<b>Chain of custody</b>		CNNF does not have a formal CoC control system in place (CAR 10/06)

### 3.3. Identified non-compliances and corrective actions

A non-conformance is a discrepancy or gap identified during the test evaluation between some aspect of the FMO's management system and one or more of the requirements of the forest stewardship standard. Depending on the severity of the non-conformance the test evaluation team differentiates between major and minor non-conformances.

- **Major non-conformance** results where there is a fundamental failure to achieve the objective of the relevant FSC criterion. A number of minor non-conformances against one requirement may be considered to have a cumulative effect, and therefore be considered a major non-conformance.
- **Minor non-conformance** is a temporary, unusual or non-systematic non-conformance, for which the effects are limited.

Major non-conformances must be corrected **before** a favorable finding of overall conformance can be issued. Minor non-conformances do not prohibit issuing an overall finding of satisfactory conformance, however, they do represent shortcomings that must be addressed in order to achieve full conformance with the standard.

With the exception of the Additional Considerations, each non-conformance is addressed by the test evaluation team by issuing a corrective action request (CAR). **Timelines for completion of CARs are not provided as the CNNF will not be pursuing FSC certification as a part of this test evaluation.**

<b>CAR #: 1/06</b>	<b>Reference Standard #: 1.6.a</b>
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	CNNF has not developed a written commitment to the FSC standards
<b>Corrective Action Request:</b> CNNF shall develop a written commitment to the FSC Principles and Criteria.	
<b>Timeline for Compliance:</b> Not Applicable	

<b>CAR #: 2/06</b>	<b>Reference Standard #: 2.2.a</b>
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Given the limited enforcement staff available to police ORV use and the increasing use of ATVs on the Forest, improper usage has the potential to cause effects inconsistent with the conservation of the Forest resource.
<b>Corrective Action Request:</b> CNNF shall ensure that their strategies (e.g. education and enforcement capabilities) are sufficient to protect the Forest resource from activity inconsistent with conserving the Forest resources.	
<b>Timeline for Compliance:</b> Not Applicable	

<b>CAR #: 3/06</b>	<b>Reference Standard #: 5.2.b, 7.1.d.1</b>
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	No determination of total allowable harvest levels of NTFPs has been made to ensure that harvest levels are within sustainable levels.
<b>Corrective Action Request:</b> CNNF shall develop an effective strategy for ensuring that each non-timber forest product harvested on its lands (especially <i>Lycopodium</i> and sheet moss) is harvested at sustainable levels. These levels shall be developed to ensure that localized populations of these resources are not jeopardized.	
<b>Timeline for Compliance:</b> Not Applicable	

<b>CAR #: 4/06</b>	<b>Reference Standard #: 6.3.a.4</b>
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	With harvest levels less than ASQ, CNNF is not meeting the age class distributions and forest structure objectives defined in the LRMP.
<b>Corrective Action Request:</b> CNNF shall either: 1) develop effective strategies to implement the management practices that will more closely adhere to LRMP harvest levels and move the Forest to the desired future condition specified in the LRMP, or 2) revise their desired future condition goals and ASQ to better reflect the actual management intensity on the Forest.	
<b>Timeline for Compliance:</b> Not Applicable	

<b>CAR #: 5/06</b>	<b>Reference Standard #: 6.4.d, 9.1.a</b>
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	CNNF has not determined whether the potential old growth stands outside currently protected areas are in fact old growth (i.e., by composition, structure, and functionality) and warrant protected designation.
<b>Corrective Action Request:</b> CNNF shall develop and implement a process to confirm whether potential old growth stands outside currently protected areas are in fact old growth (i.e., by composition, structure, and functionality) and warrant protected designation.	
<b>Timeline for Compliance:</b> Not Applicable	

<b>CAR #: 6/06</b>	<b>Reference Standard #: 7.1.b.1, 7.1.b.4</b>
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	The LRMP does not discuss the mineral resources or subsurface ownerships on the Forest.
<b>Corrective Action Request:</b> CNNF shall clearly describe in its planning documents the mineral resources on the Forest, the status and location of the subsurface rights owned by entities other than CNNF, and the effects of this ownership on the Forest resource.	
<b>Timeline for Compliance:</b> Not Applicable	

<b>CAR #: 7/06</b>	<b>Reference Standard #: 8.1.a</b>
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Annual monitoring as required by the LRMP was incomplete.
<b>Corrective Action Request:</b> CNNF shall ensure that monitoring is completed on schedule as detailed in the LRMP.	

<b>Timeline for Compliance:</b> Not Applicable
--

<b>CAR #: 8/06</b>	<b>Reference Standard #:</b> 8.2.b.1
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	CNNF documentation does not clearly address the abundance, regeneration, and habitat conditions of the non-timber forest products.
<b>Corrective Action Request:</b> CNNF inventory systems shall include the abundance, regeneration, and habitat conditions of non-timber forest products (especially <i>Lycopodium</i> and moss) that are harvested on the Forest.	
<b>Timeline for Compliance:</b> Not Applicable	

<b>CAR #: 9/06</b>	<b>Reference Standard #:</b> 9.4.b
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	CNNF does not have a consistent approach to annually monitoring some proportion of their HCVFs for changes in attributes.
<b>Corrective Action Request:</b> CAR 16/06: CNNF shall develop a protocol to consistently monitor (at least through informal observations) on an annual basis HCVF areas for changes in HCV attributes. If changes are detected, they shall be documented and measures shall be designed to restore the HCV.	
<b>Timeline for Compliance:</b> Not Applicable	

<b>CAR #: 10/06</b>	<b>Reference Standard #:</b> CoC 5, CoC 9
<b>Non-compliance:</b> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	CNNF does not have a formal chain of custody (CoC) system to facilitate the tracking of forest products from their origin.
<b>Corrective Action Request:</b> CNNF shall develop, document and apply procedures for chain-of-custody. This system shall include: <ul style="list-style-type: none"> <li>• a system to include FMO FSC certificate code and certified description of products on sales and shipping documentation</li> <li>• a system to ensure that all use of the FSC/SW trademarks, as well as related public information, are submitted to SmartWood for review and approval.</li> </ul>	
<b>Timeline for Compliance:</b> Not Applicable	

### 3.4. Follow-up actions required to meet the standard used in the test evaluation

Certification is not a potential outcome of this test evaluation. No major non-conformances were identified, so no additional actions by the CNNF were needed.

### 3.5. Observations

**Observations** are non-binding measures identified by the test evaluation team that address a very minor inconsistency or the early stages of a performance gap which does not of itself constitute a non-conformance, but which may lead to a future non-conformance if not addressed.

Observation	Standard Reference
<b>OBS 1/06:</b> CNNF staff could become more familiar with CITES and the CBD to avoid inadvertent future non-compliance.	1.3.a
<b>OBS 2/06:</b> CNNF could provide information and documentation on forest management activities to Tribal entities in a way that conforms to that desired by those entities (i.e., both full documentation and summaries of lengthy material). In addition, CNNF staff could ensure that communication, training, hiring, and other actions taken to improve the effectiveness of the relationship between CNNF and Tribal entities are occurring.	3.2.a

<b>OBS 3/06:</b> The USDA Forest Service and the CNNF could look to their employees for inputs and comments on the ongoing centralization of services and the drive toward more efficient operations before implementing such actions. This would include the “Enterprise Team” concept.	4.1.b
<b>OBS 4/06:</b> In order to avoid chronic shortfalls in achieving stated management objectives, CNNF could re-evaluate current goals and objectives in light of budgetary resources and make adjustments accordingly, to either goals or budgets, such that forest plan objectives are achievable given funding levels.	5.1.c
<b>OBS 5/06:</b> CNNF could develop quantitative guidelines for woody debris retention that can be used throughout the Forest to ensure that adequate quantities are maintained on harvest areas.	5.3.a, 6.3.c.1
<b>OBS 6/06:</b> CNNF could develop definitions of acceptable residual tree damage to ensure consistency in evaluation across the Forest.	5.3.c, 6.5
<b>OBS 7/06:</b> CNNF could consider formal training of contractors on: 1) identification of RT&E species, RSFF, and other sensitive species and communities; and, 2) procedures for reporting the detection of such species to CNNF staff.	6.2.a
<b>OBS 8/06:</b> When significant time lags occur between pre-project on-the-ground surveys for RT&E species or RFSS and the commencement of management activities, CNNF could conduct additional surveys to confirm the continued presence or absence of such species.	6.2.b
<b>OBS 9/06:</b> CNNF could develop contingency plans to ensure that adequate future funding is available to reforest areas planned for natural regeneration, but eventually found to lack adequate natural regeneration, without reducing funding for previously planned reforestation projects.	6.3.a.2
<b>OBS 10/06:</b> CNNF could consider strategies for shortening the length of time that transpires between project inception and completion in order to avoid unplanned and potentially significant delays in achieving goals for desired future forest conditions (e.g. age-class distribution),	6.3.a.4
<b>OBS 11/06:</b> CNNF could develop formal buffer width guidelines to ensure that adverse environmental changes to vernal pools smaller than one acre do not occur.	6.3.c.3
<b>OBS 12/06:</b> CCNF could review the FSC policy paper on chemical use to ensure that unintended non-conformance with that policy does not occur.	6.6.a
<b>OBS 13/06:</b> CNNF could expedite the approval of their DRAFT Emergency Preparedness Action Plan to ensure that all parties adhere to it as official policy.	6.7.a
<b>OBS 14/06:</b> CNNF could consider requiring preventative measures (e.g. equipment cleaning clauses) to all management activities that could potentially spread NNIS.	6.9.d
<b>OBS 15/06:</b> CNNF could develop and implement protocols to establish a consistent mapping template for use on all Districts that identifies all pertinent information.. CNNF could establish a timeline for implementing various components of the GIS Action Plan to ensure that these improvements to the program are completed in a timely manner.	7.1.h.1
<b>OBS 16/06:</b> CNNF could improve the likelihood that Forest-wide staff are adequately trained and qualified by maintaining training records for each employee.	7.3.a
<b>OBS 17/06:</b> CNNF could consider additional strategies (e.g. require contractors and woods workers to participate in formal training programs) to ensure consistently high standards for harvesting activities.	7.3.a
<b>OBS 18/06:</b> CNNF could require all pre-harvest meetings to be held on site to ensure that miscommunication does not occur.	7.3.a
<b>OBS 19/06:</b> CNNF could provide timber markers with training on the access requirements for harvesting operations to ensure that the correct trees are marked for access purposes.	7.3.a
<b>OBS 20/06:</b> In order to facilitate timely and meaningful assessments of their impacts on local communities, CNNF could monitor socio-economic effects (such as on	8.1.b, 8.2.d.2

forest industry employment) of management activities on a more frequent basis.	
<b>OBS 21/06:</b> CNNF could monitor hardwood tree grades on the Forest to quantify that actual changes in the grade distribution are consistent with the forest commodity goal (Goal 2.5) of the Forest.	8.2.a.1
<b>OBS 22/06:</b> CNNF could continue to aggressively address their concerns with consistent data collection and the linkage of the various databases used on the Forest.	8.2.b.1, 8.4.a
<b>OBS 23/06:</b> CNNF could develop and incorporate long-term monitoring data collection on ecologically-relevant forest attributes such as understory plant species composition and structure, vertical layering of vegetative strata, and distribution, size and decay classes of snags and CWD into its monitoring program.	8.2.c.1
<b>OBS 24/06:</b> CNNF could develop more extensive and systematic stand-level and forest-wide monitoring (of implementation and effectiveness) of wildlife den tree, snag, and coarse woody debris retention associated with regular timber harvest activities.	8.2.c.1

### 3.6. Test Evaluation Summary

Based on a thorough field review, analysis, and compilation of findings by this SmartWood test evaluation team, CNNF has demonstrated that their described system of management is being implemented consistently over the entire forest area covered by the scope of the test evaluation. As no Major Non-Conformances were identified, SmartWood concludes that CNNF's management system, if implemented as described, is in overall conformance with the FSC Standards and Additional Considerations used for this test evaluation. Areas of weakness that would need to be addressed to be in full conformance with the FSC Standards and Additional Considerations are: formal commitment to FSC; forest protection strategies and activities; management, inventory and monitoring of harvested NTFPs; age class distribution resulting from reduced harvest levels; classification of potential old growth stands (nearly completed); information management of mineral resources and subsurface rights; incomplete monitoring of LRMP objectives; annual monitoring of HCVFs; chain-of-custody system..

## **4. CLIENT SPECIFIC BACKGROUND INFORMATION**

### **4.1. Ownership and land tenure description**

In 1911, the United States Congress passed the Weeks Act, which permitted the federal government to acquire lands in the eastern U.S. for the establishment of National Forests. Both the Chequamegon and Nicolet National Forests were established by Presidential proclamation in 1933 and were originally made up of largely abandoned and tax delinquent lands acquired by the federal government under the authority of this Act. During the Great Depression, Civilian Conservation Corps (CCC) members planted thousands of acres of red pine and jack pine, built firebreaks, and constructed recreational facilities. Evidence of this history can still be seen on the CNNF. Since 1993, the two forests have been administered as one unit with Supervisor's Offices in both Park Falls and Rhinelander. The CNNF is divided into administrative units called ranger districts. There are five ranger districts on the CNNF. Three of ranger districts: Great Divide, Medford-Park Falls, and Washburn-are on the Chequamegon side of the forest. On the Nicolet side, there are two ranger districts: Lakewood-Laona and Eagle River-Florence. Each ranger district maintains an office in the communities with which they share their names except Great Divide, which has offices in the communities of Glidden and Hayward. Current acreage for the CNNF is 1,522, 485, which is 95% forested with a second growth maturing hardwood forest located at the interface between the southern deciduous forests and the northern boreal spruce-fir forests. This area constitutes approximately 4.4% of the total state land base, 9.9% of the forest land in Wisconsin, 15.5% of the commercial forest land in the northern forest region, and 36.7% of the publicly owned forest land in the northern forest region. Private land parcels are scattered within the boundaries of the CNNF, with over 1,200 separate inholdings.

### **4.2. Legislative and government regulatory context**

As a unit of the USDA Forest Service, the CNNF is required to abide by an extensive array of legislative and regulatory mandates covering all activities and operations ranging from planning processes, infrastructure development, forest management, employee relations, and law enforcement. Laws related to planning that are particularly important include the Multiple-Use Sustained Yield Act of 1960 and National Forest Management Act (NFMA) of 1976. The planning process was further enhanced with the passage of the National Environmental Policy Act (NEPA) of 1969. This Act brought environmental analysis and public participation into planning of federal activities. The NEPA process makes information available to the public both before decisions are made and prior to taking action. To be in compliance with NEPA and other relevant regulations, EISs have to be written. In the Forest Plan, EISs document the effects of implementing various forest management options.

Other major pieces of legislation include the NFMA regulations (1982 version), Endangered Species Act of 1973 as amended in 1978, National Historic Preservation Act of 1966 as amended through 1992, Archaeological Resource Protection Act (ARPA) of 1979, and Clean Water Act of 1972 as amended through 2002. New NFMA regulations established analytical and procedural requirements for developing, revising, and amending Forest Plans. In recreation management, the Land and Water Conservation Fund Act of 1965, as amended through 1996 and the National Trails System Act of 1968, are particularly relevant. The Knutson-Vandenberg Act of 1930 (16 U.S.C. 576b) as amended, authorizes the use of timber sales receipts to reforest harvested areas and protect future productivity. USDA regulations also guide issues related to employee responsibilities and conduct (7 CFR 0.735-11(b) (14)) and safety issues (Occupational Safety and Health Administration (OSHA)).

The USDA Forest Service Directives System is the primary basis for management and control of all internal CNNF programs and serves as the primary source of administrative direction for employees. It sets forth legal authorities, management objectives, policies, responsibilities, delegations, standards, procedures, and other instructions. The FSM contains legal authorities, goals, objectives, policies, responsibilities, instructions, and necessary guidance when planning and executing assigned programs

and activities. The FSHs are directives providing instructions and guidance on how to proceed with a specialized phase of a program or activity.

In several cases, Wisconsin state law also applies to CNNF forest activities. For instance, waterways are under the jurisdiction of the State of Wisconsin, who is responsible for evaluating water quality and issuing permits for management activities conducted in waterways. Hunting and fishing licenses are required on the CNNF and must be purchased from the Wisconsin Department of Natural Resources.

### **4.3. Environmental Context**

The 1.5 million acre CNNF stretches across approximately 3.5 degrees of longitude and 1.5 degrees of latitude in the northern third of Wisconsin. In a region that is approximately 80% forested, the CNNF is the largest land base under a single ownership. It is abutted by one state forest, numerous county forests, and the Ottawa NF in Michigan. Within Wisconsin, private non-industrial landowners own 52% of the northern mixed forest, county and municipal entities own 17%, and CNNF owns 13%.

Recreation and development pressures are resulting in increasing parcelization of the large ownerships that were once held by private industries in this region, resulting in numerous, smaller ownerships with diverse objectives for the property. Often, these objectives include developing a cabin or second home. Public lands provide the few remaining opportunities for maintaining large-scale contiguous forests under a common management system.

CNNF lands are located within 41 5<sup>th</sup>-level watersheds, with about half draining through the Great Lakes to the Atlantic and the other half draining through the Upper Mississippi to the Gulf of Mexico. There are 609 lakes larger than 10 acres within the CNNF boundaries. Only 9% of these lakes have shorelines that are completely federally owned, leaving the remainder of the lakes with some potential for development.

The current vegetation within the region occupied by CNNF resulted from early 1800s Euro-American settlement, followed by cutover and fires. Fire control began in the 1930s, to which many of the upland forests date their origination. The region's current, second-growth forest consists of sugar/maple basswood (37% of forest acreage), aspen/birch (27%), and spruce/fir (12%) cover types. Red and white pine combined account for approximately 7% of the forest. This forest is simplified in species composition, structure (e.g., age classes), and functional components (e.g., fire rotations) from the forest of the early 1800s. This simplification is a result of the young age of these forests, reduction in seed sources for certain conifer species (such as eastern hemlock) due to past logging, and deer herbivory on tree regeneration and ground flora. Non-native, invasive plant species on the CNNF are numerous (currently numbering 16) and have the potential to further alter terrestrial and aquatic plant communities.

Management opportunities for this region (as identified by the Wisconsin DNR) include: 1) Landscape scale forest management to retain or restore the compositional, structural, and functional attributes of northern forest ecosystems; 2) Restoration of older successional stages and larger forest patches; 3) Maintaining larger blocks of interior northern hardwood forest; 4) Restoring the missing or diminished conifer component of forests, especially hemlock, white pine, and white cedar; 5) Establishing ecological linkages within this landscape along major river corridors.

Resident populations of three federally listed RT&E species occur on the CNNF: gray wolf, bald eagle, and Fasset's Locoweed. Additionally, RFSS plants (2), animals (14), and insects (8) are found on the CNNF.

### **4.4. Socioeconomic Context**

Located in the northern region of Wisconsin, the CNNF lies within 11 different counties: Ashland, Bayfield, Florence, Forest, Langlade, Oconto, Oneida, Price, Sawyer, Taylor, and Vilas. Larger communities near or within the CNNF include Ashland, Crandon, Eagle River, Florence, Lakewood, Laona, Medford, Park

Falls, and Rhinelander. Small communities exist within the CNNF, including Drummond, Clam Lake, Perkinstown, Phelps, Tipler, Alvin, Argonne, Hiles, Wabeno, Cavour, and Mountain. Population increases in the 11 counties encompassing the CNNF ranged from 1.4 to 18.8 % between 1990 and 2000. The population continues to steadily increase. The CNNF fulfills many social, ecological, and environmental functions and is important to the fabric of the surrounding communities and the state of Wisconsin. However, the staff must manage the forest under legislative mandates while being mindful of a public who often have different and conflicting demands on the forest. Primarily, these interests include the forest products industry, environmentalists, and recreationists, to name a few. The CNNF also has an ongoing dialogue with a number of Indian Tribes and solicits their input for forest planning and management. The CNNF maintains government to government relationships with federally recognized Tribes, implement programs and activities honoring Indian treaty rights, administer programs and activities to address and be sensitive to traditional native religious beliefs and practices, and recognizes federal treaty and trust responsibilities. Visitors from other states and countries also make use of the CNNF. They commonly travel from metropolitan areas such as Duluth, Minneapolis, and St Paul in Minnesota; Wausau, Green Bay, Madison, and Milwaukee in Wisconsin; and Chicago and northern Illinois.

The CNNF is mandated by law to provide a multitude of ecosystem services to society, which includes watershed protection, plant and animal habitats, cultural history, recreation, wood products, and research and demonstration. Historically, millions of board feet of timber have been harvested annually, providing jobs for loggers and those involved in making wood products and furniture. For many rural communities, forest industries are important to the economy and cultural heritage and they depend, in part, on the forestry-based activity associated with the CNNF (e.g., average combined annual sale quantity of 106 million board feet per year from 1996 through 2001). Over 8,000 jobs have been attributed to the wood products industry in counties associated with the CNNF. The percent of National Forest land in a county is also important both socially and economically. Revenues from timber sales, special use permits, and other revenue-generating activities are important to the 11 counties with CNNF land within their boundaries, each of which is entitled to payments based on annual national forest receipts. Such payments have more than doubled from 1992 to 2001. Twenty-five Percent Fund of 1908, Payments in Lieu of Taxes (PILT), or Secure Rural Schools and Community Self-Determination Act of 2000 (SRSCS) payments to each county are directly related to the amount of National Forest land contained within the county. Of the three, the 25% Fund is the most important, as it authorizes the USDA Forest Service to pay qualifying counties 25% of the forest's annual net revenues. Payments are used by the counties for education or road construction and maintenance. Smaller communities in and near the CNNF have the most potential to be affected by changes in forestry-related and tourism expenditures. Many community residents have long depended on the forests for their livelihood and recreation while others have moved to the area more recently to retire.

The provision of forest ecosystem services also allows for a large number of customary use rights on the land base. A diverse range of forest products, from medicinal plants to sawtimber, pulpwood, and other forest products (e.g., boughs), are harvested and are important to local culture and the economy. Dozens of campgrounds provide opportunities for lakeside recreation and many more lakes and rivers are accessible at boat and canoe landings. Other activities include hunting and angling, hiking, cross-country skiing, All-Terrain Vehicle (ATV) and snowmobile use, as well as a number of non-consumptive activities such as wildlife watching, wilderness exploration, picnicking, swimming, and camping. Citizens from major cities, Wisconsin communities, and other areas travel to the CNNF to take part in both summer and winter recreational opportunities. Roads and trails provide motorized access to most parts of the CNNF and are used by hunters, anglers, and those who drive for pleasure. ATV and snowmobile trails are plentiful on the Chequamegon side and snowmobile trails are common on the Nicolet side. Sixteen semi-primitive non-motorized areas and five Congressionally-designated Wilderness areas also exist on the CNNF. The 2003 National Visitor Use Monitoring (NVUM) study on the CNNF indicated there were over 2.1 million visits directed toward these sites and activities. Recreational expenditures further add to the economic impacts derived by county economies associated with the CNNF.



## APPENDIX I: FSC Reporting Form: Detailed FMO information

### SCOPE OF EVALUATION

Type of management entity:	single FMU		
SLIMF status:	no SLIMF		
Number of group members (if applicable): Total number of Forest Management Units FMUs: <b>One</b>			
Division of the FMUs within the scope:			
	# of FMU-s	total forest area FMU group	
	1	1,522,485 acres	
List of each FMU included in the evaluation: Not applicable.			
FMU	FMU Owner	Area	Forest Type
Chequamegon-Nicolet Nat'l Forest	USDA Forest Service	1,522,485 acres	Temperate hardwoods and conifers
Product categories included in the scope:			
Type of product:	Description		
wood products	Sawtimber, pulpwood,		
Other: Special Forest Products	Balsam boughs, Christmas trees, firewood, seedlings, sheet moss, cones/acorns, other misc.		

### FMO INFO

Location of managed forests	Latitude: E 89 degrees 00 minutes Longitude: N 45 degrees 30 minutes
Forest zone	Temperate
Management tenure:	Public, federal
Number of FMO employees:	250
Number of forest workers (including contractors) working in forest within the scope of certificate:	300 (# is FMO's plus approx 50 different contractors)

### Species and annual allowable cut

Botanical name	Common trade name	Annual allowable cut	Actual harvest in last year	Projected harvest for next year
	Hardwood Pulpwood	53,000 mbf	24,300mbf	21,500mbf
	Hardwood Sawtimber	8,000 mbf	2,400 mbf	2,500 mbf
	Aspen Pulpwood	31,000mbf	11,500mbf	10,000mbf
	Softwood Pulpwood	30,000mbf	29,900mbf	26,000mbf
	Softwood Sawtimber	9,000 mbf	9,600 mbf	10,000 mbf
	Total	131,000mbf	77,700mbf	70,000mbf
Total annual estimated log production:		12,000mbf		
Total annual estimates production of NTFP (2006: Boughs		272 tons		

Firewood	4751 cords	
Princess Pine/Moss	6500 pounds	

### FOREST AREA CLASSIFICATION

Total management area		1,522,485 acres
Total forest area in scope of evaluation		1,318,863 acres
Forest area that is:		
Privately managed	0 acres	
State managed	0 acres	
Community managed	0 acres	
Federally managed	1,522,485 acres	
Area of production forests (areas where timber may be harvested)		864,094 acres
Area without any harvesting or management activities (strict reserves)		454,769 acres (strict reserves plus other non suited lands)
Area without timber harvesting and managed only for production of non-timber forest products or services		454,769 acres
Area classified as plantations <sup>1</sup>		0 acres

Area or share of the total production forest area regenerated naturally	90 %
Area or share of the total production forest area regenerated by planting or seeding	10 %
Area or share of the total production forest are regenerated by other or mixed methods (describe)	0 %

Conservation values present in the forest (High Conservation Value Forests or HCVF) and respective areas

HCVF Attributes	Description: Location on FMU	Area (ac)
A forest contains globally, regionally or nationally significant: concentrations of biodiversity values (e.g. endemism, endangered species, refugia)	Management areas 8 E, F, and G contain the highest quality, most intact, most-representative examples of the Northern terrestrial ecosystems.	184,600
A forest contains 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	The CNNF is the largest block of single ownership in the state.  The Nicolet portion of the CNNF and the Washburn and Great Divide districts of the Chequamegon portion of the CNNF represent the two largest contiguous areas of public land in Wisconsin.	1,522,485  662,000 and 576,000 acres, in that order

<sup>1</sup> According to FSC definition “plantations” in this context should be understood as forest areas lacking most of the principal characteristics and key elements of native ecosystems as defined by FSC-approved national and regional standards of forest stewardship, which result from the human activities of either planting, sowing or intensive silvicultural treatments.

They are in, or contain rare, threatened or endangered ecosystems	Management Areas 8 E, F, G	184,600
They provide basic services of nature in critical or unique situations (e.g. watershed protection, erosion control);	The CNNF is a major headwaters region, located within 41 different 5 <sup>th</sup> level watersheds averaging 235 square miles. The Forest contains almost 350,000 acres of wetlands, over 600 lakes greater than 10 acres, and over 2,000 miles of perennial streams and rivers.	1,522,485
They are 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).	The CNNF is fundamental to the economic, cultural, and ecological sustainability of a large number of local communities and Tribes throughout northern Wisconsin.	1,522,485

## APPENDIX II: Public summary of the management plan

<p><b>Main objectives of the forest management are:</b> Sustain the health, diversity, and productivity of the CNNF to meet the needs of present and future generations.  Main priority: Ensure healthy and sustainable ecosystems  <b>Secondary priority:</b> Provide multiple benefits for people within the capability of sustainable ecosystems  <b>Other priorities:</b> Ensure effective public service through organizational effectiveness.</p>	
<p><b>Forest composition:</b> The upland is 44% hardwood, oak, hemlock; 39% aspen, balsam fir, paper birch &amp; jack pine; 14% red &amp; white pine and 3% upland opening. The lowland is 50% conifer, 38% open and 12% hardwoods.</p>	
<p><b>Description of Silvicultural system(s) used:</b> Figures below relate only to suited timberlands.</p>	
<p><b>Silvicultural system</b></p>	<p><b>% of forest under this management</b></p>
Even aged management	30 %
Clearcutting (clearcut size range 40 acres*)	20 %
*Clearcuts maybe up to 1,000 acres in MA 4C & 300 acres in MA 8C	
Shelterwood	10 %
Uneven aged management	70 %
Individual tree selection (see note below)	70 %
Group selection (group harvested of less than 1 ha in size)	0 %
<p><b>Other types of management:</b> Salvage and fuels treatment as needed.  Numerous other management (non-timber) activities occur on the Forest (recreation, fish/wildlife, fire prevention/suppression, watershed, soils, non-native invasive, botany, heritage, roads, etc).</p>	100 %
<p>Note: CNNF uneven-aged management activities are mostly based on gap-phase silviculture. Silvicultural techniques associated with these prescriptions include both single tree selection and small group selections. The text in the public summary has been modified to reflect this correction.</p>	
<p><b>Harvest methods and equipment used:</b> hand and mechanized</p>	
<p><b>Estimate of maximum sustainable yield for main commercial species:</b> 251 MMBF is the Long Term Sustained Yield while 131 MMBF is the Allowable Sale Quantity.</p>	
<p><b>Explanation of the assumptions (e.g. silvicultural) upon which estimates are based and reference to the source of data (e.g. inventory data, permanent sample plots, yield tables) upon which estimates are based upon.</b></p> <p>The Spectrum model was used (Twigs volume equations modified by recent FIA data) to build our Forest Plan. The summary inventory data is stored in CDS (Combined Data System) and the actual plot data is recorded in FSVeg (Field Sampled Vegetation). Various rules (see Forest plan record) were applied to Spectrum in order to find the solution to achieving Forest species and age class composition over the long term while being consistent with the goals, objectives, standards and guidelines of the Forest Plan.</p>	
<p><b>Forest management organizational structure and management responsibilities from senior management to operational level (how is management organized, who controls and takes decisions etc.)</b> The Forest Supervisor makes forest-wide or large-scale decisions, such as implementing the harvest of declining spruce plantations across the CNNF. District Rangers make smaller scale decisions, such as timber, recreation, wildlife and fish management, for their District. District Rangers report directly to the Forest Supervisor.</p>	
<p><b>Structure of forest management units (division of forest area into manageable units etc.)</b> The CNNF is divided into five Ranger Districts that are each about 300,000 acres in size. Each District is</p>	

subdivided into Management Areas as defined in the CNNF 2004 Land and Resource Management Plan.

**Monitoring procedures (including yield of all forest products harvested, growth rates, regeneration, and forest condition, composition/changes in flora and fauna, environmental and social impacts of forest management, costs, productivity and efficiency of forest management)**

Monitoring and evaluation is designed to answer the following basic questions:

1. Did we do what we said we were going to do? Collected information is compared to Objectives, Standards, Guidelines, and Management Area direction.
2. Did it work how we said it would? This question answers whether implementation of activities such as timber harvesting are achieving goals.
3. Is our understanding and science correct? This question answers whether the assumptions and predicted effects used to formulate the goals and objectives are valid.

To answer these questions, interdisciplinary teams of Forest personnel, members of other governmental agencies (e.g. Wisconsin DNR) and/or contractors gather and analyze information and the CNNF reports the findings in an annual report. The precision and reliability of the monitoring methods vary by resource, by cost and by the relative importance of the resource issue being addressed by the monitoring activity. The results of monitoring activities enable the forest to employ adaptive management under the 2004 Forest Plan whereby the things that aren't working can be remedied and those that are working properly are validated. For more information, please see the annual monitoring & evaluation guide (available from the Forest Monitoring Coordinator) and the annual monitoring report. The 2005 Annual Monitoring Report is now available to the public via the Forest's website.

**Environmental protection measures, e.g. buffer zones for streams, riparian areas, etc., protection measures for Rare Threatened and Endangered Species and habitat:**

Chapter 2 of the CNNF 2004 Land and Resource Management Plan lists forest-wide standards and guidelines that provide protection for water, soil, biological, wildlife, fish, vegetation and other resources. A Standard is defined as a course of action that must be followed, or a level of attainment that must be reached, to achieve forest goals. Adherence to Standards is mandatory, in most cases. In general, they limit project-related activities, not compel, or require them. Standards are developed when A) applicable laws or policies do not exist, or clarification of existing laws or policies is needed, B) they are critical to achievement of objectives or C) unacceptable impacts may occur if a Standard is not employed. A Guideline is also a course of action that must be followed, however, Guidelines relate to activities where site-specific factors may require some flexibility. The Forest has cooperated and coordinated with the U.S. Fish & Wildlife Service, the Wisconsin DNR, the Great Lakes Indian Fish and Wildlife Commission and others to develop and implement these resource protection measures across boundaries and continues to evaluate their worth.

## APPENDIX III: Test evaluation standard conformance checklist (confidential)

The following checklist must be completed separately for each FMU evaluated. Based on the evaluation of conformance with each indicator, a conformance determination has been assigned. Conformance with indicators is determined by the entire test evaluation team through a consensus process. Where non-conformance with the standard is documented by the team, corrective action requests (CAR) are outlined. The following definitions apply:

<b>Precondition</b>	Requirements that FMO must meet <u>before</u> certification by SmartWood could take place.
<b>Minor CAR</b>	Requirements that FMO must meet, within a defined time period (usually within one year), during a period of the certification,
<b>Observation</b>	Non-binding measures identified by the test evaluation team that address a very minor inconsistency or the early stages of a performance gap which does not of itself constitute a non-conformance, but which may lead to a future non-conformance if not addressed.

For each indicator presented below, the test evaluation team's determination of conformance and relevant findings are presented. Where applicable, CARs or observations are referenced under the indicator and detailed in the note section of the applicable criterion.

<b>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.</b>	
<u>Criteria and Indicators</u>	<u>Findings</u>
<b>1.1. Forest management shall respect all national and local laws and administrative requirements</b>	
<b>Criterion Level Remarks:</b> Conformance	
1.1.a. Forest management plans and operations comply with applicable Federal, state, county, tribal, and municipal laws, rules, and regulations.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF 2004 Land and Resource Management Plan (LRMP) was prepared in accordance with the NFMA, NEPA, and all associated laws and regulations (p. P-1, LRMP), as are subsequent project-level activities. Appendix AA-1 (Relevant Federal and State Statutes, Regulations, Policy, Plans, and Agreements) of the LRMP lists these items that are pertinent to CNNF operations. The Forest Service Directive System (consisting of Forest Service Manuals (FSM) and Forest Service Handbooks (FSH)) details the policies and procedures that CNNF will follow. FSM 1011.04 states that "Line officers are responsible for ensuring that employees are aware of the provisions of law applicable to their responsibilities and that Forest Service programs and operations are administered in compliance with applicable laws". The FSM and the FSH may be supplemented at the Region or Forest levels to make them more restrictive.</p> <p>Numerous instances were cited by CNNF staff where they obtained state permits for CNNF work conducted within state waters. Stakeholder consultation did not present contrary evidence.</p>

	<p>There is no evidence of consistent, intentional non-compliance with laws and regulations. CNNF was recently involved with litigation on three projects: Northwest Howell, Cayuga, and McCaslin. The litigants asserted various violations of NEPA. The federal judge ruled in favor of the Forest Service on all counts, except one. The court required CNNF to supplement the cumulative effects analyses for all three projects. CNNF has now produced FSEISs for two of the three projects, which were available for public comment while in draft form. At the time of the site visit, the McCaslin FSEIS had just been appealed.</p>
<p>1.1.b. Forest management plans and operations comply with state Best Management Practices (BMPs) (see Appendix for references) and other government forest management guidelines applicable to the forest, both voluntary and regulatory (see also Criterion 6.5).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF utilizes the Wisconsin Forestry Best Management Practices (BMP) for Water Quality, as a minimum mitigation measure, whenever operating near waterways and wetlands. CNNF also utilizes the Wisconsin Construction Site Best Management Practices Handbook to mitigate impacts during road construction near waterways. No violations of these BMPs were observed during field visits.</p> <p>For those rivers on the CNNF that are designated, or eligible to be designated, as wild, scenic, and recreational rivers, additional management restrictions exceeding state BMPs are described in the LRMP (p. 3-46 to 3-48). These restrictions are designed to maintain the qualities that establish the river segment as having high wild, scenic, or recreational value.</p> <p>For non-common variety minerals (oil, gas, coal, precious metals, geo-thermal energy, and base metals), prospectors (those with mineral rights leases) are required to protect surface resources to the extent practicable for both the federally owned mineral estate and the reserved mineral estate. The specific protections required depend on type of mineral ownership and which federal and state laws apply. But in general, all mineral estate owners are subject to the federal Clean Water Act, Clean Air Act, Endangered Species Act, and the Mineral and Mining Policy act of 1970, as well as case law concerning surface owner's rights.</p> <p>The non-common variety mineral prospecting activity that has occurred on the CNNF has required prospecting permit holders to protect surface resources while conducting their prospecting activity and to perform reclamation activities as needed (e.g., drill hole abandonment and temporary road and drill site reclamation).</p>
<p>1.1.c. Forest management plans and operations meet or exceed all applicable laws and administrative requirements with respect to sharing public information, opening records to the public, and following procedures for public participation.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF makes planning documentation and forest data publicly available. Public comment is solicited prior to initiating management activities, as required by NEPA. See also Criterion 4.4 findings.</p>

1.1. DOD/DOE 1. Disputes and legal challenges over land management and agency actions, including administrative and judicial appeals filed by stakeholders outside the agency, are identified. Information on the processes for resolving disputes is readily available to interested stakeholders.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  CNNF identified all appeals and litigations related to the development of the 2004 LRMP and subsequent projects. Processes for resolving disputes are readily available to stakeholders.
<b>AC 1.1.1.</b> By policy and action, managers of National Forests shall demonstrate compliance with applicable federal laws and administrative requirements (e.g. NEPA, Roadless Area Conservation Rule and associated State Petitioning Rule, ESA, Clean Water Act, NFMA, MUSYA, The Wilderness Act, Wild and Scenic Rivers Act, Organic Act, CFR, Title 7, applicable sections of the US Code, the Forest Service Manual, and Forest Service Handbooks).	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  CNNF completed their roadless area review in 2001, identifying nine areas that met the minimum standards describing roadless areas. In the 2004 LRMP, three of these areas were designated as potential Wilderness Study Areas. The remaining areas were allocated primarily to Management Areas 1 and 2. Since these allocations were made through NEPA (and with public consultation) at the time of the plan revision, CNNF is in compliance with the Roadless Area Conservation Rule. As of the date of the test evaluation, CNNF has not received a petition for state-specified management of inventoried roadless areas under the State Petitioning Rule.  It is CNNF policy to comply with all applicable laws and regulations. These laws and regulations include those explicitly listed in this Additional Consideration: NEPA, Roadless Area Conservation Rule and associated State Petitioning Rule, ESA, Clean Water Act, NFMA, MUSYA, The Wilderness Act, Wild and Scenic Rivers Act, Organic Act, CFR, Title 7, applicable sections of the US Code, the Forest Service Manual, and Forest Service Handbooks. There is no evidence of non-compliance with the remaining elements of the Additional Consideration.
<b>AC 1.1.2.</b> Managers of National Forests shall comply with state, county, local and municipal laws except where federal law preempts state, county and local laws. When federal laws preempt compliance with those of other jurisdictions, corresponding statutes or regulations shall be specifically referenced and described.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  There is no evidence of non-compliance with state, county, and local laws. CNNF operates under State of Wisconsin permits when management activities occur in waterways. There are no known examples of federal law preempting state and local laws.
NOTES: None	
<b>1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid</b>	
<b>Criterion Level Remarks:</b> Conformance	
1.2.a. Taxes on forest land and timber, as well as other fees related to forest management, are paid in a timely manner and in accordance with state and local laws.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  CNNF is not subject to state property taxation or the payment of other fees on its lands or timber. The federal government is required to make payments to local

	<p>communities under Public Law 97-258 (Payments in Lieu of Taxes (PILT)) to offset the reduction in local property tax receipts due to non-taxable federal lands in the local jurisdiction. Also, under the Secure Rural Schools and Community Self-Determination Act (SRSCS; PL 106-393), the federal government pays 25% of timber revenues or a “full payment” amount to local communities based on the three highest past 25% payments. All payments are made by the Department of Interior to the State of Wisconsin, who then distributes the funds to local communities. Data provided by the State of Wisconsin and the Forest Service for the most recent year available (2005) confirmed that these payments, totaling \$2.85 million, had been made to the 11 counties where CNNF lands are located.</p>
<p>NOTES: None</p>	
<p><b>1.3. In signatory countries, the provisions of all the binding international agreements such as CITES, ILO conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>1.3.a. Forest management operations comply with all binding treaties or other agreements to which the U.S. is a party, including treaties with American Indian tribes.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF staff stated they were not aware of any international agreements that would affect CNNF lands (<b>OBS 1/06</b>). However, CNNF staff were also not familiar with international agreements such as CITES or the Convention on Biological Diversity (CBD).</p> <p>CNNF lands provide “...treaty guaranteed hunting, fishing and gathering rights ... that may be exercised on lands administered by the Forest Service located within the ceded territories” to certain Bands of the Ojibway Nation. CNNF operates under the “MEMORANDUM OF UNDERSTANDING REGARDING TRIBAL - USDA- FOREST SERVICE RELATIONS ON NATIONAL FOREST LANDS WITHIN THE TERRITORIES CEDED IN TREATIES OF 1836, 1837, AND 1842” to ensure CNNF’s compliance with these treaties.</p> <p>Based on field observation, CNNF is not harvesting, or allowing to be harvested, species listed in CITES and CNNF is adequately addressing the CBD Focal Areas for the 2010 Biodiversity Target.</p>
<p>1.3.b Forest owners or managers comply with ILO Labor Conventions impacting forest operations and practices and the ILO Code of Practice on Safety and Health in Forestry Work.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF, as a federal entity, is required to adhere to the Fair Labor Standards Act. There was no evidence of non-compliance with the ILO Labor Conventions.</p>
<p>NOTES: <b>OBS 1/06:</b> CNNF staff could become more familiar with CITES and the CBD to avoid inadvertent future non-compliance.</p>	
<p><b>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.</b></p>	
<p><i>Applicability note to Criterion 1.4: When the certifier (i.e., the FSC-accredited certification body)</i></p>	

*and the forest owner or manager determine that compliance with laws and the FSC Principles cannot be simultaneously achieved, the matter is referred to FSC.*

**Criterion Level Remarks:** Conformance

1.4.a. Where conflicts between laws and FSC Principles and Criteria occur, they are referred to the appropriate FSC body.

Conformance with Indicator: Yes  No  N/A

There are no known conflicts between the laws and regulations directing CNNF operations and the FSC Principles and Criteria.

NOTES: None

**1.5. Forest management areas should be protected from illegal harvesting, settlement, and other unauthorized activities.**

**Criterion Level Remarks:** Conformance

1.5.a. Forest owners or managers implement measures to prevent illegal and unauthorized activities in the forest.

Conformance with Indicator: Yes  No  N/A

In 2006, CNNF developed the Timber Theft Prevention Plan to "...to improve and standardize theft prevention and detection measures by gaining consistency at the Forest level." This Plan was developed as a result of a 1996 national audit by the federal Office of the Inspector General that found the need for better coordination between law enforcement personnel, better accountability for tracer paint, and for independent checks of additional sale volume. The Plan is designed to address "...violations of laws and regulations, noncompliance with timber sale contract provisions resulting in resource degradation, special forest products program administration, and unlawful cutting or removal of timber on adjacent public and private lands within National Forest boundaries."

Most, but not yet all, CNNF parcel boundaries are well marked and numerous examples of these boundaries were reviewed in the field. CNNF uses gating in sensitive areas to restrict motorized public access. CNNF relies on four Law Enforcement Officers, two on each side of the Forest, and approximately 12 Forest Protection Officers per District to respond to illegal activities. The Forest also has cooperative agreements with local sheriff's departments to provide assistance.

While timber trespass and theft of forest products have occurred, these instances are vigorously investigated and remedied. CNNF, as well as other National Forests in the Region, has a zero tolerance policy for cutting merchantable unmarked trees within sale units. This was repeatedly stressed by a variety of sale administrators across the Forest.

CNNF has regulations in place to protect the Forest against illegal ATV use, illegal dumping, and illegal harvesting of non-timber forest products. CNNF enforces these regulations to the extent of their capability (however, see also Indicators 2.2.a and 5.1.a findings).

NOTES: None

**1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC**

<b>Principles and Criteria.</b>	
<i>Applicability note to Criterion 1.6: This criterion is guided by FSC Policy and Guidelines: Partial Certification for Large Ownerships (BM19.24), May 2000.</i>	
<b>Criterion Level Remarks:</b> Minor non-conformance.	
1.6.a. Forest owners or managers provide written statements of commitment to the FSC Principles and Criteria. The commitment is stated in the management plan [see 7.1], a document prepared for the certification process, or another official document.	Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>  CNNF has not developed a written commitment to the FSC standards ( <b>CAR 1/06</b> ).
1.6.b Forest owners or managers document the reasons for seeking partial certification.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  All CNNF lands are included in this test evaluation.
1.6.c Forest owners or managers document strategies and silvicultural treatments for several harvest entries that meet the FSC Principles and Criteria (see Principle 7).	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  The 2004 Plan projects management actions and effects for a 100-year period.
NOTES: <b>CAR 1/06:</b> CNNF shall develop a written commitment to the FSC P&C.	

<b>PRINCIPLE 2. TENURE AND USE RIGHTS AND RESPONSIBILITIES - Long-term tenure and use rights to the land and forest resources shall be clearly defined documented and legally established.</b>	
<b><u>Criteria and Indicators</u></b>	<b><u>Findings</u></b>
<b>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. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b>	
<b>Criterion Level Remarks:</b> Conformance	
2.1.a. Forest owners or managers document the legal and customary rights associated with the forest. These rights include both those held by the party seeking certification and those held by other parties.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  The CNNF has thorough documentation on their legal and customary rights associated with the forest.  SmartWood was provided with two documents detailing this. The first was titled "Historical Summary of Land Adjustment and Classification, Chequamegon National Forest 1925-1962." The second document was titled "Historical Summary of Land Adjustment and Classification, Nicolet National Forest 1925-1962." The purpose of these documents was to have available a concise summary on the legal establishment of each forest and to have a record of subsequent changes to the land base or classification of activities.  SmartWood was shown the deeds or titles, and in some cases abstracts (Record of Ownership), that contained a summary of all conveyances and the Chain of Title for CNNF properties. The Chain of Title details successive conveyances, from the original acquisition to the present point in time, for all properties and are kept in the respective

county courthouses of the land base. Microfilm copies are kept in the Rhinelander Supervisor's Office under the auspices of the Lands and Recreation Program Manager and in the Medford/Park Falls District Office under the auspices of the Realty Specialist.

The process for using these documents and validation of their existence were given to SmartWood by examining a current case involving Agnes Bay Road, where it was in question as to who owns the road and what rights a landowner holds when accessing an inholding. The microfilm of the deeds and abstracts are kept in a fireproof safe in the Realty Specialist's Office in the Medford/Park Falls District Office. Also, kept there, and in every district office, are the Land Status Atlases which contain a paper summary of the landowner title and encumbrances (T&E) at the time of purchase. The T&E section may contain information used to pursue individual cases. In this case, the description triggered the pulling of the microfilm, printing of the deeds and abstracts and then initiating a call to the county courthouse to verify the document wording. These documents were presented to SmartWood as proof of process. A summary of the findings are to be given to the District Ranger who will then make a decision on the ingress and egress on the road. Before a special use permit or easement is issued the staff will have to make sure it is in compliance with the standards and guidelines in the forest plan.

The CNNF is mandated by law to provide a multitude of ecosystem services to society which includes watershed protection, plant and animal habitats, cultural history, recreation, wood products, and research and demonstration. These services allow for a large number of customary use rights on the land base such as timber harvesting and recreation. Recreational activities include hunting and angling, hiking, cross-country skiing, ATV and snowmobile use, as well as a number of non-consumptive activities such as wildlife watching, wilderness exploration, picnicking, swimming, and camping.

Tribal Bands also have special use rights associated with the CNNF. There is a Memorandum of Understanding (MOU) between the Bands and the CNNF that defines the standards that will be used by both parties during the Bands' exercise of their rights. The MOU is a public document. The Great Lakes Indian Fish and Wildlife Commission (GLIFWC) confirmed the cooperation of the CNNF in this regard.

All federally owned minerals are managed by the BLM and, in the case of National Forest lands, the USDA Forest Service manages surface occupancy. The BLM managed subsurface non-common variety minerals include oil, gas,

	<p>coal, precious metals, geo-thermal, and base metals, for which there has been no extraction, only prospecting activity on the CNNF. Common variety minerals include sand and gravel, limestone, and dimension stone. The National Forest has complete administrative authority for common variety minerals. The CNNF has about 30 active sand and gravel mining operations (170 acres) that are used for CNNF's local road and infrastructure maintenance. The CNNF is required to supply itself with these materials and it has discretion as to when and where it will develop these resources.</p> <p>By law, subsurface mineral rights take precedence over surface rights, whereby the owner has the right of access to the mineral estate and the right to develop it as established by various laws and case law history. On the CNNF, some of the mineral estate is owned by the federal government through acquired lands, none of which is subject to the 1872 mining law (i.e., you can not stake a claim on the CNNF). The rest is outstanding and reserved mineral rights owned by state and local governments, private individuals, and corporations. The State of Wisconsin has a Dormant Mineral Rights law that applies to reserved and outstanding mineral rights allowing rights to the mineral estate to revert back to the surface owner by filing a Statement of Mineral Claim. The CNNF does file Statements of Mineral Claim on dormant mineral rights. Ownership information resides in paper land status atlases and deed records in the offices of the CNNF and the county courthouses.</p>
<p>2.1.b. Affected land boundaries are clearly identified on the ground by the forest owner or manager prior to commencement of management activities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Priorities for boundary line establishment and maintenance are in place, with the highest priorities given to those areas due for management or where legal issues occur. All areas are mapped, with boundary lines denoted. In some areas without management activity, where there is not enough control (i.e., no known section corner) and costs for surveying a small area are unreasonable, the boundary lines are not formally established. However, some type of encroachment or pending forest management activity would cause the CNNF to run the line.</p> <p>In accordance with the forest plan, boundary lines need to be marked to standard before project activities are performed. Therefore, they are marked for all project EISs. When project EAs are undertaken the District Forester requests that a boundary line be run. Currently, District Rangers are providing the Forest Land Surveyor with enough lead time to enable the CNNF to run boundary lines before timber is marked and cut. Where possible, EAs are grouped so that boundary line work can be accomplished more efficiently.</p>
<p>NOTES: None</p>	
<p><b>2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the</b></p>	

**extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.**

*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.*

**Criterion Level Remarks:** Minor non-conformance

2.2.a. The forest owner or manager allows legal and customary rights to the extent that they are consistent with the conservation of the forest resource and the objectives stated in the management plan.

Conformance with Indicator: Yes  No  N/A

The CNNF allows legal and customary uses on the land (e.g., camping, dispersed recreation, hunting, fishing, hiking, horseback riding, mountain biking). Trails for motorized and non-motorized uses are common. Dozens of campgrounds provide opportunities for lakeside recreation. Many more lakes and rivers are accessible at boat and canoe landings. There are over 300 wildlife species known to inhabit the CNNF some time during their life cycle. These species provide users with a wide variety of recreational opportunities, such as hunting and wildlife viewing. These uses are recognized in the forest management plan as being consistent with the conservation of the natural resource base, when appropriately managed, and the forest plan objectives.

Due to the amount of attention given recreation in the FEIS and LRMP, coupled with NVUM visitation results showing increased use, it is apparent that recreation is a major priority for the CNNF. One of the major challenges is balancing the management of recreation activities among users and between recreational uses and the concern for the natural resource landbase. In the FEIS, access and recreation was one of the four key items needing focus when developing the LRMP. Some residents in these communities have long depended on the forests for their livelihood and recreation. New retirees in the area have added to the demand for access to all the forest has to offer. Challenges presented to the CNNF are manifested in the stated goals for the forest. For example, stated goals in the LRMP are to maintain diversity and quality of recreational experiences with acceptable limits of change to ecosystem stability and condition. The LRMP also has a goal to provide opportunities for recreational, aesthetic, and educational experiences within wilderness and Wilderness Study Areas that are consistent with the values of those areas.

A number of issues have arisen with ORV use, specifically ATVs. There have been complaints concerning abuse of the resource base, as well as cultural resource areas being overrun. Some would like to see them banned entirely. On the other hand, there are those that feel ORV use is being overly restricted because the CNNF does not provide enough trails for ATV use. These proponents want the trail system expanded, also citing economic benefits from allowing their use.

	<p>To compound the issue, there are relatively few Law Enforcement Officers to handle such a large land base, let alone deal with just this issue. Law Enforcement Officers interviewed confirmed the most common and disturbing problems encountered involve ATVs. Written notices and violation notices for improper ORV use numbered 72 in 2003 and 116 in 2005, evidence of both increasing enforcement and ORV use. Another complication on this issue is that the tradition on the Chequamegon side of the Forest had no real restrictions for ATVs, whereas the Nicolet side of the Forest always had a more restrictive policy. Several stakeholders discussed problem ORV sites and the test evaluation team did observe adverse impacts in some of the areas visited.</p> <p>The CNNF has made positive strides in controlling ATV use since the 2004 Plan was implemented. These include a prohibition of off road/off trail use, closure of the "Open 26" play area, the 6-week spring closure, and the designation of roads open to ATVs. The Forest intends to continue working cooperatively with ATV user groups and WDNR to develop information and education programs that encourage responsible riding.</p> <p>CNNF states that their law enforcement staffing is short by one individual on the west side of the forest. CNNF also notes that many of the District staff are also Forest Protection Officers (FPO's) and are able to write citations and violation notices. In all, there are a total of approximately 60 FPO's forest-wide. Even so, given what appears to be a limited enforcement staff available to functionally police ORV use and the increasing use of ATVs on the Forest, improper usage has the potential to cause significant negative environmental effects that are inconsistent with the conservation of the Forest resource (<b>CAR 2/06</b>).</p> <p>As stated in Indicator 2.1.a., Tribal Bands also have special use rights associated with the CNNF that the Bands retained by treaty with the federal government. The Great Lakes Indian Fish and Wildlife Commission (GLIFWC) confirmed the cooperation of the CNNF in this regard. To ensure these rights are consistent with the conservation of the forest, the CNNF staff provides the Tribes, through GLIFWC, information on proposed forest management activities and through dialogue come to a consensus that is mutually beneficial to both parties.</p>
<p>2.2.b. On ownerships where customary use rights or traditional and cultural areas/sites exist, forest owners or managers consult with concerned groups in the planning and implementation of forest management activities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Prior to implementing management practices, the CNNF consults with Tribal concerns (e.g., GLIFWC, individual Tribes negotiating on their own) on their customary use rights (e.g., fishing, hunting, gathering) and relevant cultural</p>

	<p>areas/sites. Tribal contacts confirmed this.</p> <p>Also, through public stakeholder input mandated in the NEPA process there are multiple opportunities for stakeholders and other interested parties to provide input on proposed CNNF management activities. In the National Visitor Use Monitoring studies, recreationists have opportunities to voice their opinions on issues related to recreational opportunities on the forest. Recreational stakeholder inputs are gathered every five years and used to adjust forest management strategies. Also, as stated in the LRMP, the CNNF has as one of its objectives, consultations with various groups and agencies. For example, the intention is to consult with the Wisconsin and Michigan Departments of Natural Resources on achieving desired wildlife and fish population goals through appropriate habitat management relative to forest management activities.</p>
<p>NOTES: <b>CAR 2/06:</b> CNNF shall ensure that their strategies (e.g. education and enforcement capabilities) are sufficient to protect the Forest resource from activity inconsistent with conserving the Forest resources.</p>	
<p><b>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.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>2.3.a. The forest owner or manager maintains relations with community stakeholders to identify disputes while still in their early stages. If disputes arise, the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If negotiation fails, existing local, state, Federal, and tribal laws are employed to resolve claims of land tenure (see Glossary).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF regularly communicates with various community stakeholder groups and special interest groups to promote and enhance use rights. The CNNF, as mandated by law, has an extensive public input process they must follow. The input from affected communities are documented and incorporated into their management, as appropriate. In addition, The CNNF staff also reaches out to various groups. For example, CNNF staff continually communicates with GLIFWC to discuss issues related the forest planning and management and its effects on Tribal fishing, hunting, camping, and gathering rights. Other contacts include recreationists through the periodic National Visitor Use Monitoring studies. These contacts serve to prevent any points of contention from escalating into full blown disputes.</p> <p>When other issues develop (e.g., adjacent landowner boundary line disputes, timber theft) CNNF staff, and when necessary law enforcement staff, attempt to resolve the matter through negotiated settlement. Most violations concern timber theft related to firewood collection, trash and debris dumping, and off road vehicle/ snowmobile/ATV use (921 incident reports since January 2003). An Offense Search Summary was provided to the auditors detailing road and trail violations (257 since January 2003). CNNF's law enforcement officers use their discretion, and may give</p>

	<p>verbal warning for first time offenders (85 since January 2003). When serious issues of any kind remain unresolved, the staff will eventually direct the matter to the Office of the General Counsel, who will provide legal opinions and services related to the problem. On fish and wildlife issues, the CNNF works with Wisconsin DNR Conservation Officers.</p> <p>From the mail surveys, 86.6% of respondents felt the CNNF was in compliance with laws and regulations relating to forest management activities. A majority (61.9%) also felt that the CNNF responded satisfactorily to public inquires on management activities.</p> <p>In some instances there may be an immediate need for the involvement of law enforcement (e.g., egregious boundary lines issues). The USDA Forest Service is authorized by federal law to enter into contractual agreements with local and state law enforcement agencies for dedicated law enforcement activities conducted on National Forest lands. Local and state agencies are reimbursed for expenses incurred during these activities.</p>
<p>2.3.b. The forest owner or manager provides information to the certification body regarding unresolved and/or ongoing disputes over tenure and use-rights.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF staff made available to the auditors information on all unresolved and ongoing disputes.</p> <p>Some issues arise when private dwellings encroach upon the forest. In these cases, the lands staff and Supervisor's Office work directly with the District Ranger to resolve the issue. These cases rarely go to litigation. The Small Tract Act permits the USDA Forest Service to survey the land in question, at the landowner's expense unless the USDA Forest Service does the work. The CNNF can then sell up to 10 acres of the property being used by the landowner to that landowner.</p> <p>Larger use-rights disputes arise on two levels, one at the LRMP level and one at the project level. The forest plan can, and has been, appealed. Appeals of the 2004 LRMP were decided in favor of the LRMP and it remained unchanged. The auditor was given documentation on the appeals and the subsequent decisions in this regard.</p> <p>At the project level, project EAs and EISs can be contested in court once all appeals are exhausted. Historically, there have been few EA appeals that were ruled in favor of the appellant. Project EAs are not usually appealed unless the project involves timber harvesting. In 2003, five EISs were appealed and litigated, with two being resolved in court in favor of CNNF and three found to be deficient in their cumulative effects analysis.</p> <p>Of the six legal issues brought by plaintiffs in the remaining</p>

	<p>unresolved projects, five were ruled in favor of CNNF and one was ruled in favor of the plaintiff (insufficient cumulative effects analysis). For two of these projects, a Supplemental Environmental Impact Statement (SEIS) was developed. For the third, the CNNF staff is currently deciding how to address the cumulative effect analysis. During the audit, the FSEIS appeal period closed on one project, with the FSEIS being appealed just before the deadline.</p>
<p>NOTES: None</p>	

<p><b>PRINCIPLE 3. INDIGENOUS PEOPLE'S RIGHTS - THE LEGAL AND CUSTOMARY RIGHTS OF INDIGENOUS PEOPLES TO OWN, USE AND MANAGE THEIR LANDS, TERRITORIES, AND RESOURCES SHALL BE RECOGNIZED AND RESPECTED.</b></p>	
<p><i>PRINCIPLE APPLICABILITY NOTES: APPLICABILITY NOTE TO PRINCIPLE 3: THE TERMS "TRIBES", "TRIBAL" OR "AMERICAN INDIAN GROUPS" IN INDICATORS UNDER PRINCIPLE 3 INCLUDE ALL INDIGENOUS PEOPLE IN THE US, GROUPS OR INDIVIDUALS, WHO MAY BE ORGANIZED IN RECOGNIZED OR UNRECOGNIZED TRIBES, BANDS, NATIONS, NATIVE CORPORATIONS, OR OTHER NATIVE GROUPS.</i></p>	
<p><b><u>Criteria and Indicators</u></b></p>	<p><b><u>Findings</u></b></p>
<p><b>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.</b></p>	
<p><b>Criterion Level Remarks:</b> Not Applicable. CNNF does not manage Tribal lands.</p>	
<p>3.1.a. On tribal lands, forest management and planning includes a process for input by tribal members in accordance with their laws and customs.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>CNNF does not manage Tribal lands.</p>
<p>3.1.b. Forest management on tribal lands is delegated or implemented by an authorized tribal governing body.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>CNNF does not manage Tribal lands.</p>
<p>NOTES: None</p>	
<p><b>3.2 Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance.</p>	
<p>3.2.a. Forest owners or managers identify and contact American Indian groups that have customary use rights or other legal rights to the management area and invite their participation in the forest planning processes, appropriate to the scale and intensity of the operation. (see also Criterion 4.4.)</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>As stated in the LRMP, and related to the auditor by CNNF employees, it is the intention of the CNNF to consult with Tribes and Bands and intertribal agencies (e.g., GLIFWC, which represents 11 Tribes and Bands) during decision-making processes related to forest management. This includes considering the effects of natural resource management decisions on the ability of Tribes and Bands to exercise gathering rights. Site-specific project analyses conducted by CNNF address how project proposals may affect the ability of tribes to exercise hunting, fishing or gathering rights.</p> <p>There are 12 federally recognized tribes and Bands in central and northern Wisconsin. Not all Tribes and Bands are interested in working with the CNNF. Seven tribes have Tribal Historic Preservation Officers (THPOs). Communications are directed to the Tribes and Bands either</p>

	<p>through intertribal agencies (e.g., GLIFWC for Chippewa or Ojibwe Tribes only) or with specific Tribes directly [e.g., Lac du Flambeau (LdF)], often through the THPO.</p> <p>On the CNNF, the tribal liaison or Forest Heritage Program Manager, District Rangers, and/or archeologists facilitate the process for distributing information and documentation and thereafter gathering input from tribal members on forest management activities. In addition, the CNNF periodically meets with the Tribes to discuss issues of mutual interest. Tribal and Band members can also attend public stakeholder meetings. Tribal representatives are informed through letters and verbal contact. While communication is channeled through normal processes, the level of contact goes above what is provided to the general public due to the working relationship that the CNNF has with Tribes and Bands. . Documentation was provided to the auditor in the form of a reply from a THPO to a letter previously sent to the THPO by the archaeologist concerning a restoration project. The reply indicated that the project would have no effect on historic or cultural resources significant to the tribe. However, in a conversation with a THPO and other Tribal representatives, it was expressed that the CNNF does not effectively communicate with the Tribes on other projects they feel will affect Tribal interests (<b>OBS 2/06</b>).</p> <p>During the audit visit, the tribal liaison position was vacant. It was expressed to the auditor by Tribal members that they were dismayed at not being consulted when the job description was developed to replace the liaison. Their perception is that this position will be filled by a public relations person, not an individual solely concerned with Tribal interests.</p> <p>Several CNNF employees thought that the transfer of information could be packaged more appropriately for the Tribes. GLIFWC confirmed this notion by indicating that, while they want to see all information and documentation, summarizations of lengthy materials would benefit the Tribes and the large number of individuals who want to read these materials. A Tribe, not represented by GLIFWC, also had this request. Another Tribal representative said that the Tribes would prefer to have fewer generic correspondences and more face-to-face consultations where key CNNF personnel, relative to the issue, could sit down with Tribal representatives. (<b>OBS 2/06</b>).</p>
<p>3.2.b. Steps are taken during the forest management planning process and implementation to protect tribal resources that may be directly affected by certified operations such as adjacent lands, bodies of water, critical habitats, and riparian corridors as well as other resource uses such as rights to hunt, fish, or gather.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>For federal agencies, such as the USDA Forest Service, legislation dictates much of what is done to protect Tribal resources. For example, the National Historic Preservation Act (NHPA) of 1966, as amended in 1992, further directed federal agencies such as the USDA Forest Service to establish preservation programs in line with their goals and</p>

	<p>objectives for the forest and gauge the effects of their program activities on historic and cultural areas of significance.</p> <p>According to the CNNF staff, 20 resource areas have been designated as Special Management Areas (SMA) with an MA 8F designation. Under the MA 8F designation, a site is characterized as having unique areas of physical, biological, and cultural features of forest or regional significance and includes representative examples of natural, historical, paleontological, and archeological values. The LRMP describes the standards and guidelines for protecting these areas.</p> <p>CNNF staff also periodically asks Tribal representatives to comment on sites nominated for the National Register of Historic Places (NRHP). For example, in 2005 the LdF Band and the Lac Vieux Desert (LVD) Band were asked to review the NRHP nomination of the Butternut-Franklin Lakes Archeologist District. The Bands voiced their support for the nomination.</p> <p>When forest management activities are scheduled, the CNNF staff consults with the Tribes and Bands to inform them of pending activities and solicit their opinions. For example, the LRMP states that when restoring large woody debris by annually treating some lakes with tree drops and/or cribs, the staff will consult with the Tribes and Bands when proposing this treatment on lakes where spear fishing occurs.</p> <p>In 2004, a MOU between the CNNF and the Forest County Potawatomi, the LVD Band, and the Keweenaw Bay Indian Community was developed with the intent of assisting Tribal interest in the use and application of GPS and GIS methodologies as applied to mapping and management of cultural resources, all in an effort to further protect sensitive resources. In addition, CNNF policy will permit Tribal representatives to review heritage records and documents and photocopy those which are relevant to Tribal areas of interest.</p>
<p><b>AC 3.2.1.</b> Solicitation of tribal collaboration is tailored to incorporate cultural sensitivity and awareness and will be undertaken with a commitment to honor government to government relationships.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>As stated in the LRMP, it is the intention of the CNNF staff to honor the U.S. Government trust responsibility and treaty obligations toward Indian Tribes and Bands within a government-to-government relationship. As a result, the CNNF provides information to tribal organizations and individual Tribes and Bands on forest management planning of activities.</p> <p>On the CNNF, the tribal liaison or Forest Heritage Program Manager, District Rangers, and/or archeologists facilitate the process for distributing information and documentation</p>

	<p>and thereafter gathering input from tribal members on forest management activities. In addition, the CNNF periodically meets with the Tribes to discuss issues of mutual interest. Tribal and Band members can also attend public stakeholder meetings.</p> <p>As previously stated, interviews with GLIFWC, indicated that they were appreciative of the information provided but desired a more condensed version of some of the longer documents for those who do not care to read documents in their entirety. However, one Tribe indicated that they felt they were not receiving all the information they should be receiving. In addition, it was stated that CNNF staff, who act as liaisons with the Tribes and Bands need additional training to be able to better communicate with the Tribes, and this would include cultural and sensitivity training. Tribal contacts revealed that past communications ran from very cooperative and sensitive to insensitive.</p>
<p><b>AC 3.2.2.</b> Consultation techniques used for soliciting tribal input are adapted as necessary to achieve effective communication and collaboration, and will include both written and verbal correspondence.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The document titled "Programmatic Agreement Among The U.S.D.A. Forest Service, Chequamegon-Nicolet National Forest, and the Wisconsin State Historic Preservation Officer, Wisconsin Historic Society, Regarding Forest Service Activities and Consultation with the State Historic Preservation Officer" was developed in accordance with NHPA section 106 and serves as the consultation protocol for the CNNF. It includes the types of consultation techniques that can be used for soliciting Tribal input aimed at achieving effective communication and collaboration for both formal (e.g., following standards and guidelines for reporting and database entry) and informal (e.g., using electronic media) consultation, coordination, and information exchange between the CNNF, the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation, and Native American Tribes and Bands. The Advisory Council on Historic Preservation is the first and only federal entity created solely to address historic preservation issues. While the CNNF is technically following the law, there needs to be refinements in some techniques to make communications more effective.</p> <p>CNNF staff maintains a list of appropriate contact persons for tribes, bands, and tribal representatives. An extensive list was provided to SmartWood for the test evaluation.</p> <p>CNNF staff participates in a number of training activities and meetings related to enhancing the exchange of information and perspectives needed to interact with the tribes and bands.</p>
<p>NOTES: <b>OBS 2/06:</b> CNNF could provide information and documentation on forest management activities to Tribal entities in a way that conforms to that desired by those entities (i.e., both full documentation and summaries of lengthy material). In addition, CNNF staff could ensure that communication, training, hiring, and other actions taken to improve the effectiveness of the relationship between CNNF and Tribal entities</p>	

are occurring.

**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.**

**Criterion Level Remarks:** Conformance.

3.3.a. Forest owners or managers make systematic efforts to identify areas of cultural, historical, and/or religious significance. They invite participation of tribal representatives (or other appropriate persons, where tribal entities are lacking) in the identification of current or traditionally significant sites within the forest proposed for certification.

Conformance with Indicator: Yes  No  N/A

The CNNF Heritage Program staff make systematic efforts to identify areas of cultural, historical, and/or religious significance. These activities include: 1) surveys to identify cultural resources, 2) protection of documented cultural resources, 3) evaluation to determine significance (e.g., does the site merit NRHP status), 4) mitigation when avoidance from forest activity is impossible, and 5) interpretation for the public benefit. The survey methodology employed by the CNNF staff has been agreed to and accepted by the Wisconsin SHPO.

Currently, there is one archaeologist permanently employed by the CNNF. This individual is assisted by one permanent full-time archaeological technician. Further, there is a student intern currently enrolled as a graduate student in anthropology specializing in archaeology. This individual will receive a Master's degree in 2008, and then be converted to a permanent full-time archaeologist on the CNNF. Because the staff is small, the CNNF is able to accomplish a significant amount of historic preservation-related services through contracting. For example, they are currently involved in a 5-year "indefinite delivery/indefinite quantity" contract with a full service cultural resource management firm. The firm under contract has all the specialists needed (e.g., archaeologists, historians, architectural historians), and each is available to the CNNF through the development of contractual task orders. The staff believes they have accomplished a significant amount of work through contracts, partnerships (e.g., Wisconsin Historical Society), and voluntary services (e.g., Passport in Time volunteers). As of September 2006, 2,500 cultural resources have been documented; however, only 220 have been thoroughly processed.

One THPO interviewed felt the firm contracted by CNNF to perform cultural resource work was a reputable one that does good work, but that overall these sites were not receiving all the attention they deserve from the firm and the CNNF. It was stated that the CNNF was not doing as good a job as possible in identifying historical sites and the impacts from management activities on these sites. This assessment was based more on the allocation of resources than from the standpoint of quality of work. No other tribal representatives contacted had a similar opinion. One mail survey respondent felt that some resources were being damaged from recreational use.

	<p>There have been many successful cases of cooperation, documented by the CNNF and confirmed in conversations with Tribal members. For example, there was one incidence where blasting for quartz crystals by the public was impacting a site also used by the Potawatomi Tribe and the THPO brought it to the attention of the CNNF staff. The District Ranger met with the THPO and the elder council concerning religious activities that take place here four times per year. Actions were taken to protect the site (e.g., mapping, providing a MA 8F designation) and its resources and the CNNF permitted the Tribe to use the site during religious ceremonies. Although the Tribe did not have exclusive rights to the site, it can now use what is known as the Quartz Hill Special Management Area.</p>
<p>3.3.b. Forest owners and managers consult with tribal leaders (or other appropriate persons, where tribal entities are lacking) to develop mechanisms that ensure forest management operations protect from damage or interference those areas described in 3.3.a. and incorporate these special places into forest management and operational plans.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Twenty resource areas on the CNNF have been designated as SMAs with an MA 8F designation. Many of these sites contain sensitive Tribal resources and are protected based, in part, on Tribal consultations. The LRMP describes the standards and guidelines for protecting these areas. The NRHP process is also used with the CNNF soliciting Tribal and Band inputs for potential areas deserving designation.</p>
<p>3.3.c. Confidentiality of disclosures is maintained in keeping with applicable laws and the requirements of tribal representatives.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The confidentiality of archaeological, historical, and cultural sites are protected, in part. Disclosure of these areas is exempt from the Freedom of Information Act. The CNNF does not disclose or identify cultural resources in the field so as to not draw attention to them.</p>
<p>NOTES: None</p>	
<p><b>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 is formally agreed upon with their free and informed consent before forest operations commence.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>3.4.a. Forest owners or managers respect the confidentiality of tribal knowledge and assist in the protection of tribal intellectual property rights.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF respects the confidentiality of Tribal knowledge and, whether it is used in management decisions or not, does not disclose it. Cooperation among the Tribes and the CNNF on projects of mutual interest is the expressed, and mandated, goal of both parties.</p>
<p>3.4.b. A written agreement is reached with individual American Indians and/or tribes prior to commercialization of their indigenous intellectual property, traditional knowledge, and/or forest resources. The individuals and/or tribes are compensated when such commercialization takes place.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>There is no commercialization on the part of the CNNF of indigenous intellectual property, traditional knowledge, and/or forest resources owned by the Tribes, therefore, no written agreement exists. This was verified through stakeholder contacts.</p>
<p>NOTES: None</p>	

**PRINCIPLE 4. COMMUNITY RELATIONS AND WORKERS' RIGHTS - FOREST MANAGEMENT OPERATIONS SHALL MAINTAIN OR ENHANCE THE LONG-TERM SOCIAL AND ECONOMIC WELL BEING OF FOREST WORKERS AND LOCAL COMMUNITIES.**

<u>Criteria and Indicators</u>	<u>Findings</u>
<b>4.1 The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b>	

**Criterion Level Remarks:** Conformance

<p>4.1.a. Opportunities for employment, contracting, procurement, processing, and training are as good for non-local service providers as they are for local service providers doing similar work.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>USDA Forest Service opportunities for employment, contracting, procurement, processing, and training are as good for non-local service providers as they are for locals. For all USDA Forest Service employees, the same pay scale, job description, benefits, and other related items apply throughout the United States. Thus an employee's status as local or non-local is immaterial.</p> <p>The CNNF advertises nationally for employees and through the DEMO Authority, which goes to the public so anyone can apply. The DEMO Handbook can be found in the Forest Service Handbook 6109.16, Demonstration Project Handbook.</p> <p>The staff described several purchasing scenarios for goods and services. For example, if Engineering needs gravel hauled, this service is requested from the Integrated Acquisition System (IAS), as a requisition that goes to a Lead Purchasing Agent (LPA). The LPA decides who gets the order within the CNNF staff, a purchasing agent or a contract specialist. All requisitions must be prepared and processed appropriately to ensure that the Federal Acquisition Regulations (FAR) are being followed.</p> <p>Purchases of less than \$25,000 require a competitive bidding process with two or more vendors. There is a bidders list primarily consisting of local vendors. There is a Request for Quote form that the USDA Forest Service uses to schedule items and supply services needed from small local vendors</p> <p>The CNNF uses an Advance Acquisition Plan to assist with purchasing items over \$25,000. Past work plans are used to come up with current work plans. The LPA gets the work plan and looks to see who is assigned to it, and ties it into an Acquisition Plan number with a work plan number. The assigned purchasing agent then decides how to handle the purchase. Larger purchases of more than \$25,000 are made by advertising nationwide in the Federal Business Opportunities (FBO) venue, unless specific socio-economic program goals dictate otherwise.</p> <p>The contractor stakeholder list consisted mostly of local contractors. Timber sales are conducted and a number of</p>
--	---

	contractors, each with varying capabilities, are able to bid on these jobs.
4.1.b. Forest work is packaged and offered in ways that create quality work opportunities for employees, contractors, and their workers.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The extremely diverse activities engaged in by the USDA Forest Service and CNNF staff (e.g., timber sales administration, recreation management, wildlife management) and contractors (e.g., timber harvesting, archaeology) leads to quality and challenging work opportunities.</p> <p>USDA Forest Service criteria for hiring contractors evaluates work quality based on past performance, references, and price. The CNNF believes that contractor relations are positive and stable and that contractors view the CNNF as an employer of choice. This was validated by long-term contractor re-bidding on the CNNF. An interview with an employee of a local logging contractor verified that relations have been long-term and stable for his employer. Forest Service Manual 6100 (Personnel Management) and Forest Service Handbook 6100 (Personnel Management) provide guidelines for personnel practices.</p> <p>All opportunities for employee advancement are made available to all USDA Forest Service employees through its competitive procedures for advertising all vacancy announcements. Another process for doing this comes under the Merit Promotion Procedures. Those eligible include status (i.e., career or career-conditional) employees and persons meeting special hiring authorities. The Merit Promotion Plan can be found in the Forest Service Handbook FSH 6109.12, Chapter 20 - Internal Placement. The other outlet detailing employee advancement is the DEMO Authority. Also, the CNNF staff occasionally distributes inter-office correspondence on positions for career or skill enhancement that are made available to employees. The U.S. Office of Personnel Management (OPM) sets the qualifications for each position, which is based on education, specialized experience, or a combination of both; solely on education; and/or whether they are already a federal employee. Employees are paid according to series (e.g., professional, technical, administrative) or grade general schedule pay scale. There are 10 steps for advancement within each level.</p> <p>All full- or part-time USDA Forest Service employees with employment exceeding 90 days are eligible to earn sick and annual leave. The amount is determined by the leave category they are in, but it is a minimum of four hours per bi-weekly pay period, which is pro-rated for part-time employees. The federal government Federal Friendly Family Leave Act is available to employees with certain restrictions. Information on this Act can be found at: <a href="http://www.opm.gov/oca/leave/">http://www.opm.gov/oca/leave/</a>.</p>

	<p>Permanent employees are eligible to participate in a three-tiered retirement package which is composed of The Federal Employment Retirement System/Thrift Savings Plan/Social Security. There are three retirement plans: Civil Service Retirement System (CSRS), Federal Employees Retirement System (FERS), and CSRS Offset. Retirement benefits are based on age and years of service at the time of retirement. Life insurance is offered through the Federal Employees Group Life Insurance (FEGLI) program and health insurance benefits offered through the Federal Employees Health Benefit program. Eligibility varies depending on your appointment category. Each year there is an open period where employees can change their benefit declarations.</p> <p>Both USDA Forest Service employees and contractors are encouraged to participate and provide input into decision-making processes. Contractors, who are more locally involved, have access to their Technical Representative on the CNNF to provide feedback. CNNF staff periodically meets with contractors before jobs are undertaken and then they confer during the job implementation. However, all actions are performed within the constraints of procedures and regulations under which the USDA Forest Service must act.</p> <p>Several current and past employees have expressed a dissatisfaction and demoralization with the introduction of "Enterprise Teams" where activities involved with these groups were viewed as time consuming and inefficient. There also exists an apprehension revolving around future outsourcing for services. It was understood that moves toward a centralized business plan by the USDA Forest Service were going to be reevaluated after implementation but several employees saw an "after the fact" approach as counter productive (<b>OBS 3/06</b>).</p> <p>Since USDA Forest Service employees are covered by federal law, employment conditions are as good for non-local workers as they are for local workers doing the same job. In addition the union makes sure there is a level playing field for working conditions, benefits, and promotion. The Human Resource Center also oversees these issues.</p> <p>The USDA Forest Service provides a number of training opportunities for its employees to enhance their on-the-job skills and promote safety in the workplace. An extensive database is kept to track training accomplishments and needs. This documentation was provided to the audit team (e.g., on Defensive Driving-Training). Every first Wednesday of the month there are Safety and Health meetings held forest-wide. Three years of documentation were provided to the auditor.</p>
4.1.c. Forest owners or managers	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<p>contribute to public education about forestry practices.</p>	<p>The USDA Forest Service and the CNNF provide a number of educational opportunities such as interpretation, internships, cooperative student opportunities, and scholarships.</p> <p>Three programs are currently in place:</p> <ol style="list-style-type: none"> <li>1. The Student Temporary Employment Program (STEP) provides an opportunity for enrolled college students to earn money, continue their education, train with professionals, and combine academic study with on-the-job experience. Jobs are available during summer breaks and offer a variety of technical positions in areas as wildlife management and hydrology.</li> <li>2. The Student Career Experience Program (SCEP) is the primary source for external recruitment for entry-level hires in the USDA Forest Service, pending the enrolled college student has performed up to standards set for the position. It provides work experience directly related to the student's academic program or career goals.</li> <li>3. The Student Intern Program- Student provides internships, similar to SCEP, that are used to diversity the workforce with traditionally underrepresented groups, except that it provides noncompetitive positions for 2 years to those who have graduated college. Interns are hired with high-level skills in science and silviculture.</li> </ol> <p>All three programs are implemented in cooperation with the U.S. Civil Rights Office. Program leaders for recruitment liaison and develop relationships with land grant and historically black universities, and recruit from Native American Tribes. It is the District Rangers job to maintain Tribal relationships and facilitate employment with Native American community colleges. Northland College in Ashland, WI provides a source of Asian student workers.</p> <p>The Northern Great Lakes Visitor Center in Ashland WI, is owned by the USDA Forest Service, and managed in cooperation with five other agencies and organizations. Educational and interpretive opportunities are offered by the Center to the public (e.g., fishing clinic for students from Washburn High School). Exhibits (e.g., Whittlesey Creek NWR display) and workshops (e.g., Regional Wisconsin History Day Teacher Training Workshop) are scheduled throughout the year. Visitation averages over 150,000 per year.</p>
<p>4.1.d. Forest owners or managers participate and invest in the local economy and civic activities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Interviews with CNNF employees find them to be actively</p>

	<p>engaged in local community organizations and activities. The CNNF staff provided a lengthy list of work-related, civic, and community development activities engaged in by the CNNF employees and their partners from 2003 to present. Key activities take place at the Northern Great Lakes Visitor Center (e.g., traveling exhibits, special events, youth education programs (K-12), teacher/educator workshops). A listing was provided by district. For example, 14 activities were listed for the Eagle River-Florence District and Florence Wild Rivers Interpretive Center (e.g., legislator tours, interpretive talks, trail maintenance with the Ruff Grouse Society, etc.). Individual employees also reported on activities they take part in. For example, the Forest Geologist has participated in local County Forest Field Days to provide local private landowners information on use of soil survey data in forest management and non-native, invasive plant species of concern and how to control them. He participates in a local land use planning (Smart Growth) effort. He also served as a group facilitator to guide local citizen participation in development of local land use plans (done outside the CNNF and not as an agency representative). One District Ranger has supported local service groups (e.g., Lions Trail Association) to use National Forest trails for regional dog sled racing and snow-shoe racing events.</p> <p>All CNNF facilities (e.g., offices, campgrounds) are regularly maintained and updated. All office machinery, copiers printers, fax machines, are maintained. If problems arise the staff tries to fix the item, otherwise they call the Information Services Organization (ISO). The ISO will call for help from a vendor list of specific service providers in the local area. Equipment, especially vehicles, undergo regular inspections and periodic replacement.</p> <p>There are 10 Supervisor and District Offices in local communities. CNNF works with local entities to access services (e.g., towns, counties). Activities and related purchasing of goods and services provide an economic enhancement for local communities. CNNF provided a list of cooperative service agreements during the field visit. Communities in which National Forest land resides also receive funds from two sources: the Payment in Lieu of Taxes and either 25% of timber harvested for a Fiscal Year or a "Full Payment" under the Secure Rural Schools and Community Self-Determination Act.</p>
<p>4.1.e. Employee compensation and hiring practices meet or exceed the prevailing local norms for work within the forest industry that requires equivalent education, skills, and experience.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The USDA Forest Service, and hence the CNNF's, pay schedule is based on OPM job classifications. Salaries are competitive with those offered in private industry for the same job positions. The OPM sets the qualifications for each position description, which could be based on education, specialized experience, or a combination both;</p>

	solely on education; and/or whether they are already a federal employee.
<p>4.1.f. Forest owners or managers assure that contractors, subcontractors, intermediaries, and persons hired by them are covered and protected by all state and Federal labor laws regarding discrimination, wages, benefits, and other conditions of employment.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>There are two primary areas of contractual agreements, timber sale and service contracts. Contracts contain clauses specific to legal coverage and protection. Contracts are established with the intent of complying with all applicable state and federal laws. Standard clauses are used to cover specific legal coverage and protection and to specify items such as labor rates. Contractors and subcontractors make a bond payment as do sub-contractors and suppliers.</p> <p>The CNNF staff monitor legal compliance by contractors, subcontractors, and other persons hired to work on the forest.</p> <p>Employees are not discriminated against because of gender, race, religion, age, and disability with respect to hiring, dismissal, remuneration, and other conditions of employment. This protection is guaranteed under Executive Order 11246, as amended, by the U.S. Equal Employment Opportunity Commission (EEOC).</p>
<p><b>AC 4.1.1.</b> A comprehensive listing of all applicable laws, regulations and administrative requirements and their applicability to USFS forest management shall be maintained with listed documents made accessible to all employees.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF has an Intranet site, available to all employees, with listings or links to, all applicable laws, regulations, and administrative requirements and their applicability to USDA Forest Service and the CNNF. Employees can access the information on the OPM web site, benefits and retirement options, human resource issues, and a new employee orientation. The auditor received a tour of the Intranet site during the field visit.</p>
<p><b>AC 4.1.2.</b> Migrant worker conditions (including transit to and from work sites) are monitored by both contractors and Forest Service personnel for compliance with USFS policies and contract specifications, applicable labor laws and other associated regulations.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>USDA Forest Service contracting representatives take the OSHA 10-Hour training workshop to orient them on general issues related to the forest industry and contracting and to cover such items as how to navigate the USFS Manual and to become educated on how the USDA Forest Service works with OSHA regulations. This workshop is provided on a one-time basis to employees. Over the last two years, the CNNF has given two classes, with an additional class scheduled in the near future. This training relates strongly to migrant worker issues.</p> <p>The Migrant and Seasonal Agricultural Workers Protection Act (MSAWPA) of 1999 mandates worker protections and pertains, in part, to forestry. Those performing tree planting, timber stand improvement work, wildland fire fighting, and other field activities along with retirees and other seasonal workers are given legal protections. Most migrant workers are involved with tree planting on the CNNF. The CNNF</p>

	<p>uses a 7-page check list to ensure adequate lodging and sanitation conditions exist for migrant and seasonal workers.</p> <p>During worker solicitation and hiring, contractors must obtain a Certificate of Registration from the DOL or an authorized state agency. CNNF staff notifies the DOL and OSHA of the award contract and a MSAWPA poster needs to be posted at the job site in English and Spanish. It is required that the foreman speaks English. The contractor needs to carry the Certificate at all times. Pre-work meetings occur to disclose the full terms of employment, personal protective equipment, first aid, supplies, motor vehicle safety, transport, and lodging to employees. Solicitation addresses language and this becomes part of the contract. There are also further protective stipulations in MSAWPA for transportation and housing.</p>
<p>NOTES: <b>OBS 3/06:</b> The USDA Forest Service and the CNNF could look to their employees for inputs and comments on the ongoing centralization of services and the drive toward more efficient operations before implementing such actions. This would include the “Enterprise Team” concept.</p>	
<p><b>4.2 Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>4.2.a. The forest owner or manager and their contractors develop and implement safety programs and procedures.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF does not require logger training, although programs are available in the State (e.g., FISTA which is headquartered in Rhinelander, WI). CNNF requires contractors and their staff to comply with all state and federal laws, particularly with OSHA regulations. CNNF does not sponsor training programs for loggers. CNNF sale administration staff have attended training in OSHA requirements and have a three-stage process for monitoring and enforcing OSHA compliance on harvest sites. Forest Service Manual 6700 (Safety and Health Program) and Forest Service Handbook (6700 Safety and Health Program) provide guidelines for CNNF employee safety. Safety clauses are included in forest work contracts, and examples were provided to SmartWood.</p> <p>Each position on CNNF has a Job Hazard Analysis (JHA) performed that documents hazards that can be encountered by the position and describes hazard mitigation procedures and required training. Safety records are maintained in a central database. CNNF conducts accident investigations (i.e., safety reviews) on all incidents. CNNF provided a listing of the Job Hazard Analyses that are in place for CNNF staff to the auditor. Training and safety records for CNNF staff were fully reviewed during the test evaluation.</p> <p>The database on forest safety and health training received by CNNF employees is sent to the Forest Safety Officer. The Officer can run queries on defensive driving, chain saw use, first aid, CPR, snowmobile use qualifications, ATV use</p>

	<p>qualifications, and the operation of a cross cut saw, to name a few. Several queries were run and provided to the auditor.</p> <p>The Equipment Specialist provided a detailed process description and documentation on how the machinery and equipment used on the forest is maintained to a fully operable and safe condition. Accident prevention clauses include an erosion control spill plan.</p> <p>The Safety and Wellness Committee (SWELL) deals with safety issues and includes a union representative on the committee. The Forest Safety Officer develops topics and program specialist policies for safety related to such areas as driving and chain saw use.</p>
NOTES: None	
<p><b>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).</b></p> <p><i>Applicability Note to Criterion 4.3: Compliance with this criterion can be accomplished with guidance from FSC Certification and ILO Conventions: FSC Policy Paper and Guidelines. May 20, 2002.</i></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>4.3.a. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Employees (e.g., clerical, technical, professional staff) on the CNNF have the option of joining the National Federation of Federal Employees (NFFE), International Association of Machinists and Aerospace Workers, Local 2165. CNNF has a Partnership Agreement with NFFE. The CNNF Union President stated that most employees were in the union. There is a union representative for the whole forest (i.e., Union President) who was interviewed by the auditor. In addition, there is a union representative in each District Office. There is also a steward at each administrative office and at least one from each District Office. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests.</p>
<p>4.3.b. Forest owners or managers and their contractors develop effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Generally, informal mechanisms are used to resolve disputes between employees and management and may vary among the District Offices depending on the values, views, and ideas of current personnel. Most disputes involve employee conduct, performance, and work conditions. There have been more conduct-related incidences rather than performance-related incidences, with some incidences related to sexual harassment and the misuse of the telephone.</p> <p>The CNNF uses an Alternative Dispute Resolution (ADR) to resolve conflicts with the assistance of a third-party. If there is a dispute between an employee and management that can't be resolved, it then goes to the union. A union</p>

representative will attempt to assist in resolving the dispute. If management has a complaint against an employee for unfit conduct, then management can come to the union as well and a union representative will be present to help resolve the problem. A typical action may be documented in an ADR letter by the union representative that may call for an employee suspension, or in less serious cases, the employee may be asked to donate some vacation time. In addition, employees can call an 800 number for advice and free counseling sessions, in some cases, in lieu of discipline.

Employees can file a pre-grievance based on procedures in their union contract. This sets in place a 21-day period to solve the problem. A mediator is brought in for a face-to-face, more formal venue to resolve the issue. Regions 8 and 9 have a national mediator group trained in mediation that the CNNF staff can utilize when there are more complicated disputes.

If there is no agreement, then employees file a formal grievance, in writing. This is filed with the Regional Forester, who makes a determination to management or exercises the management decision. If this is not agreeable, either party may go to arbitration. The process from here follows federal labor relations authority regulations. A mutually agreeable arbitrator is chosen out of a list kept by the CNNF, and then the process goes to a formal arbitration hearing.

On the CNNF, the Union President revealed that In the last five years there have been no disputes that have gone to arbitration.

Training continually occurs on the CNNF for dispute resolution through the Training Partnership Council, where training is held to work out issues ahead of time. Part of it is to learn to work together in a more harmonious fashion. In 2006, the USDA Forest Service Chief's Award was given to the CNNF's Labor Union Training Partnership Council on Relations. The Council consists of five union officers and five management representatives who meet quarterly on workplace issues. A \$20,000 grant, which came from the Award, was received by the union for use for training supervisors and union stewards. Over ½ of the money was used to train mediators who work at the pre-grievance level. Currently, there is a need for more mediators with training at the forest level.

The USDA Forest Service and contractors are protected under the Contract Disputes Act (CDA), which creates a comprehensive system for resolving disputes between a contractor and a procuring agency relating to the performance of most procurement contracts. For both, if

	<p>there are safety violations, pay issues, or fraud, staff or contractors can report to the CNNF contracting officer representative or inspector. Depending on the severity of the issue, the contracting officer may be able to resolve the issue. If it is more serious, then the CNNF Supervisory Contract Specialist gets involved.</p> <p>If there is no resolution to the contractual requirement specifications, the staff member or contractor can write a formal letter stating the problem. The CNNF Supervisory Contract Specialist will examine the facts and make a decision. This would normally resolve the issue unless the contractor wants to appeal and take the case to the court system (i.e., United States Court of Federal Claims).</p> <p>There are other dispute resolution processes that work to prevent issues from arising. For example, the Region 9 office has an employee relation manager who can be brought in as consultant to assist in team building on the forest. Region 9 has a pilot of their own to bring in a trainer who will solicit employees to become pre-grievance facilitators, who could then develop a group that would work to minimize conflicts.</p>
<p>NOTES: None</p>	
<p><b>4.4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.</b></p> <p><i>Applicability Note to Criterion 4.4: People and groups directly affected by management operations may include: employees and contractors of the landowner, neighbors, fishers and hunters, recreationalists, users of local water, and processors of forest products.</i></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>4.4.a. On lands with multiple owners, a process is provided that assures the opportunity for fair and reasonable input from the landowners and/or shareholders.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF issues a Schedule of Proposed Actions on a quarterly basis to inform the public of upcoming projects and their opportunity to provide comments. Project proposals and decisions are posted on the CNNF web site on a regular basis.</p> <p>CNNF lands are managed in consultation with American Indian rights and programs as interpreted by court decisions, U.S. Congressional law, and in executive orders and other actions of the President and Executive Branch of the U.S. Government.</p> <p>The FEIS describes all consultation processes and stakeholder feedback utilized in developing the 2004 LRMP. This involved consultation and information exchanges with communities, individuals, local governments, including counties, agencies, NGOs, and regional tribes and bands. Forest management issues also spanned administrative and regional boundaries by collaborating with other national forests and other federal</p>

	<p>agencies. In sum, all stakeholders are considered and have a fair chance to provide inputs into management planning.</p> <p>Individuals or groups have the option to appeal certain environmental projects. 36 CFR 215 and recent guidance from the USDA Forest Service Washington D.C. office address the appeal process and regulations.</p>
<p>4.4.b. Input is sought in identifying significant sites of archeological, cultural, historical, or community importance, that are to be designated as special management zones or otherwise protected during operations.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF consults with cultural (e.g., GLIFWC, Tribal THPOs, independent Tribes), historic (e.g., Wisconsin Historical Society), and archaeological professionals to identify significant sites. The CNNF contracts a number of archaeological services to a local firm. In addition, a number of other programs are utilized to assist with site identification and protection. One example cited is the "Passport in Time" volunteer program, which utilizes the public in heritage resource management projects on National Forests. Many projects include archaeological excavation, site mapping and monitoring, and restoration work.</p>
<p>4.4.c. Viewpoints and feedback are solicited from people and groups directly affected by forest management operations and its associated environmental and aesthetic effects (e.g., logging, burning, spraying, and traffic). Significant concerns are addressed in management policies and plans.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The USDA Forest Service is mandated by law to incorporate public participation in project development and implementation. Stakeholder meetings and consultations are held to solicit inputs and concerns in regard to forest management activities. Project-level activity notifications are available via the Internet (Schedule of Proposed Actions) and are provided by mailings.</p>
<p>4.4.d. Forest owners or managers of large and mid-sized (see Glossary) forests provide opportunities for people directly affected by management operations to provide input into management planning.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>"Appendix A-Forest Plan Revision Issues and Public Involvement" of the FEIS describes in detail the public consultation process for the 2004 Plan. For example, tribes, other federal agencies, State and local governments, individuals, and organizations helped identify LRMP revision issues. CNNF hosted a series of open house meetings when the Notice of Intent was issued. Meetings provided information about the LRMP revision process and gathered public input on the scope of the pending management decisions. Forest planning open houses, newsletters, and news releases informed the public about the progress of the revision. Public input helped shape alternatives considered during the revision process. Following release of the proposed LRMP and DEIS, 10 informational open houses and five formal public hearings were held. The 90-day comment period was extended for an extra 30 days. Approximately 3,000 unique responses were received with multiple comments on Draft documents. Also see Indicator 4.4.a findings.</p>
<p>4.4.e. For public forests, consultation will include the following components:</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

<p><i>Note: 'The public' includes people and groups directly affected by management operations and all citizens of the relevant jurisdiction.</i></p> <p><i>Applicability Note: For the purposes of indicator 4.4.e each numbered component should be scored separately.</i></p> <p>1. Legislative and historical mandates are included in the plan, and provisions are made for their accomplishment.</p> <p>2. Clearly defined and accessible methods for public participation are provided in both the strategic (long-range) and tactical (short-range) planning processes, including initial adoption and subsequent amendments. <i>Applicability Note: Strategic plans may be very general. Tactical plans are specific and describe candidate stands for proposed silvicultural activities.</i></p> <p>3. Public notification is sufficient to allow interested citizens of the affected jurisdiction and/or other people and groups directly affected by management operations the chance to learn of upcoming opportunities for public review and/or comment on the proposed management.</p> <p>4. The final planning decisions are based on legal mandate, public input, credible scientific analysis, and the productive capacity of the land and are made by professional employees, hired by the public, or other legally authorized parties.</p> <p>5. An accessible and affordable appeals process to planning decisions is available.</p> <p><i>Note: FSC certification does not preclude any individual or group from seeking legislative or judicial relief.</i></p>	<p>Pertinent legal mandates are included in planning documentation (e.g., FEIS, LRMP). In addition, listings and/or links to legislative and historical mandates are available on the CNNF Internet web site, and the CNNF Intranet web site, which is available to all employees. Through documentation and interviews with employees and external stakeholders, there was no indication that legal mandates are not being carried out. NEPA and 36 CFR 215 provide guidelines for public participation and appeal processes.</p> <p>Public notification of proposed actions is done quarterly. Public comments are summarized and described in planning documents. CNNF's response to the comments is also recorded.</p> <p>Both the FEIS and the LRMP, which are public documents, clearly outline the procedures for public participation in the CNNF activities. The CNNF is engaged in carrying out open, transparent, public consultative processes for both the strategic (e.g., LRMP) and tactical level planning (e.g., Projects). Also, the CNNF makes available to the public information through a number of venues. For example, as stated in the FEIS for the CNNF, NEPA incorporates environmental analysis and public participation requirements into the land management planning process. NEPA procedures ensure that environmental information is made available to the public before decisions are made and before actions are taken. The period of time provided under federal guidelines is more than sufficient. In the input process for the proposed LRMP and DEIS, the 90-day comment period was extended for an extra 30 days, illustrating the CNNF's willingness to provide an adequate window for participation. Scientific analyses, expert agency input, and public scrutiny are all essential to implementing forest plan revision following NEPA procedures. The CNNF web site is continually updated to include information on upcoming natural resource activities and proposals. The CNNF also sends out 30 news releases annually to convey information about the forest to the public. Periodically, Public Service Announcements are sent out to over 80 e-mail outlets and faxed to 60 more. These outreach informational releases seek to solicit public input as early as possible in project planning.</p> <p>Final planning decisions (e.g., forest projects) are based on legal mandates and procedures, public input, credible scientific analysis, and the productive capacity of the land. These decisions, while made by CNNF employees all with specialized skill levels, are not made in isolation. The FEIS describes how public inputs are used in various management alternatives. An accessible appeals process to planning decisions is available, as evidenced by the number of appeals that occur. No individuals or groups are</p>
--	---

	precluded from engaging in the legal process. However, while CNNF funds are sufficient to cover the additional work required by appeals, in most cases this diverts resources from other forest activities.
4.4. DOD/DOE 1. Forest managers carry out open, transparent, public consultative processes for the resolution of rights and claims (see Criterion 2.3), assessment of social impacts (see Criterion 4.4), assessment of environmental impacts (see Criterion 6.1), development and review of the management plan (see Criterion 7.1), and identification and delineation of High Conservation Value Forests (see Principle 9). Forest managers address (incorporate or provide a rationale for not incorporating) input from all interested members of the public, locally and nationally, including lay and expert stakeholders.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The elements of the consultative processes are addressed in CNNF planning documents (e.g., FEIS, LRMP). The CNNF is engaged in carrying out open, transparent, public consultative processes for the resolution of rights and claims (see Criterion 2.3), assessment of social impacts (see Criterion 4.4), the assessment of environmental impacts (see Criterion 6.1), the development and review of the Forest Plan (see Criterion 7.1), and the identification and delineation of HCVFs (see Criterion 9.2).</p> <p>The CNNF staff does not exclude any stakeholder inputs, therefore, it does not provide a rationale for not incorporating input from stakeholders. All inputs are considered as mandated by laws and regulations, and through processes undertaken at the forest level to gather inputs (e.g., providing through a number of venues information on future management and planning activities and asking for inputs). One stakeholder did express frustration with CNNF not responding to repeated efforts to provide direct input on management issues however this was by far the exception.</p>
4.4. DOD/DOE 2. In addition to the public summary, full certification reports are readily accessible to interested stakeholders. Locations of sensitive resource sites and classified information may be withheld.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF and The Pinchot Institute for Conservation will make all reports generated through this test evaluation available to the public. The USDA Forest Service is also subject to the Freedom of Information Act, thus the document will, by law, be available to the public.</p>
4.4. DOD/DOE 3. Forest management and planning operations include measures to mitigate negative effects to local communities, the forest, and water quality that might accrue from the use and disposal of hazardous materials, munitions, and other military or industrial activities.	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Use and disposal of hazardous materials, munitions, and other military activities do not occur in proximity to the CNNF. Therefore, there is no reason to account for this in forest management and planning. There has been no active uncommon mineral extraction occurring on the forest for some time. Should this occur, federal and state laws provide mitigation procedures.</p>
NOTES: None	
<p><b>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 livelihood of local peoples. Measures shall be undertaken to avoid such loss or damage.</b></p> <p><i>Applicability Note to Criterion 4.5: Provisions of Criterion 4.5. do not evoke protections or liabilities beyond those provided by U.S., state, and local laws.</i></p>	
<b>Criterion Level Remarks:</b> Conformance.	
4.5.a. The forest owner or manager attempts to resolve grievances and mitigate	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<p>damage resulting from forest management activities through open communication and negotiation prior to legal action.</p>	<p>While CNNF has an “open-door policy” for receiving public concerns, the actions that CNNF staff may take in potentially litigious situations is limited by law and regulation. There are many informal (e.g., personal contact) and formal (e.g., letters) processes available for resolution of conflicts. In all cases, the intent is to resolve conflict at the lowest possible level through informal processes using open communication and negotiation rather than through those that might lead to legal action. If the problem can’t be resolved at this level, the CNNF employee consults with their supervisor, who will direct them to the Office of the General Counsel. FSM 6170 provides detailed information and direction in this area.</p>
<p>4.5.b. Forest owners or managers and their contractors have adequate liability insurance.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF staff stated that redress for damages would be covered under the Federal Tort Claims Act and that the federal government is self-insured. Federal Acquisition Regulation (FAR) 28.306 addresses contractor insurance coverage. As a result of this regulation, CNNF does not require liability insurance for its reforestation contracts. Contractors are not required to carry liability insurance for contract values under \$25,000. While contractors are not <u>required</u> to have liability insurance, they typically carry at least \$100,000 in insurance. The only exception is when they are working on a government installation, where liability insurance is required per FAR. A stipulated award letter denotes the liability requirement and a letter of proof is required by the USDA Forest Service in 10 days, to certify that insurance is being obtained. There have been other special circumstances where liability has been required. The USDA Forest Service has a mechanism in place where, when a contractor is engaged under contract, they become an agent of CNNF and are covered under the Federal Tort Claims Act. Also, the USDA Forest Service by regulation insists that contractors (e.g., loggers, truckers) must also comply with the federal regulations and laws applicable to the CNNF.</p> <p>For contracts over \$100,000, the USDA Forest Service requires specific kinds of insurance to adequately cover potential liabilities. Contracts less than \$100,000 or those procured under simplified act procedures require that contractors follow state law, which includes certain types of insurance (e.g., workman’s compensation). Construction contracts over \$25,000 include a payment guarantee to sub-contractors and laborers.</p> <p>All contracts require workmen’s compensation.</p>
<p>NOTES: None.</p>	

**PRINCIPLE 5. BENEFITS FROM THE FOREST - Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a**

<b>wide range of environmental and social benefits.</b>	
<b><u>Criteria and Indicators</u></b>	<b><u>Findings</u></b>
<b>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.</b>	
<b>Criterion Level Remarks:</b> Minor non-conformance. At the present time, CNNF funding levels are adequate to maintain forest health and productivity (that is, there is not a degradation of the Forest resource as a result of current funding levels). However, the ability to meet Forest-wide LRMP objectives over the timeframe of the Plan is constrained, in part, by inadequate funding levels. Since this is an issue that has the potential to adversely affect the Forest in the future (while current Forest condition is acceptable), a minor non-conformance is issued.	
5.1.a. The forest owner or manager is willing and able to support long-term forest management (i.e., decades rather than quarter-years or years), such as planning, inventory, resource protection, and post-harvest management activities.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The USDA Forest Service, as a century-old organization, has demonstrated organizational viability which, among other actions, calls for creating a new forest management plan at least every 15 years. On the CNNF, the latest plan came into effect in 2004. The Forest Plan provides direction for the future forest condition from the standpoint of a long-term perspective relative to ecosystem sustainability, range of natural variability, fish and wildlife and the uses of fish and wildlife, heritage resources, lands and land ownership, mineral resources, recreation, ATV and snowmobile use, non-motorized trails, social conditions for northern Wisconsin, soils, special forest products, and timber.</p> <p>NFMA (36 CFR Ch. II, 7-1-90ed. 219.3) planning regulations require forest plans to maximize net public benefits. Net public benefits are defined as the overall value to the nation of all outputs and positive effects (benefits) minus all USDA Forest Service inputs and negative effects (costs) associated with producing primary benefits (whether they can be quantitatively valued or not). The planning regulations also require consideration of economic efficiency in net public benefit maximization.</p>
5.1.b. Responses (such as increases in harvests or debt load) to short-term financial factors (such as market fluctuations and sawmill supply requirements) are limited to levels that enable fulfillment of the management plan.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Timber harvesting on the CNNF is not altered in response to short-term financial or supply factors. All harvesting is conducted to fulfill the objectives laid out in the Forest Plan.</p>
5.1.c. Investment and/or reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>At the present time, CNNF funding levels are adequate to maintain forest health and productivity (that is, there is not a degradation of the Forest resource as a result of current funding levels). However, the ability to meet Forest-wide LRMP objectives over the timeframe of the Plan is constrained, in part, by inadequate funding levels. Investment and reinvestment in forest management were marginally sufficient to fulfill management objectives and maintain and/or restore forest health and productivity. The CNNF has an extraordinarily broad array of management</p>

objectives that, due to in part to funding levels, were only partially being met.

The CNNF is required by law to provide long-term forest management on its lands. Over the past 13 federal fiscal years, CNNF's budget has been relatively stable, with the last several years showing increases. The CNNF staff predicts that vegetation management budgets will remain stable, while there may be small decreases to other programs. However, when combined with delays resulting from appeals and litigation, budget allocations even for vegetation management have not been adequate for CNNF to fully implement the forest plan.

Some programs have also seen budget reductions. For example, fewer acres of upland forest opening construction and maintenance were completed than planned, in part, due to reduced budgets. Wildlife openings are funded through both timber sale receipts (CWKV funding) and through funds provided by partner organizations. While the Forest does attempt to secure funding from outside organizations, CNNF has experienced a reduction in such contributions. Additionally, some stakeholder 's commented that budget allocations and staffing for boundary line activities and law enforcement fall short of present needs. No evidence of inadequate boundary line marking was observed during the test evaluation.

SmartWood acknowledges that CNNF is not in control of their budget. While the Forest does not anticipate that future funding levels will be adequate to fully implement the Forest Plan, they do not know with certainty which areas will be emphasized or de-emphasized from one year to the next. Consequently, it is difficult to adjust management goals and objectives without the ability to plan on funding levels. CNNF has been proactive in seeking and developing innovative approaches to maintaining forest health and to reduce the number of projects delayed or derailed by appeals (e.g. enhanced cumulative effects analysis) in an ongoing effort to better achieve forest goals. Currently, there are approximately 500MBF of timber sale projects in litigation or in the process of NEPA analysis. (**OBS 4/06**).

The issue of forest health has been challenging over the last few decades with problems associated with recreation, invasive plant species, ATV and snowmobile use, among others. CNNF has responded to these problems with efforts in research and management activities. CNNF invests in non-commercial forest stand improvements, tree planting, prescribed burning, wildlife/fisheries programs, and numerous recreational projects. Investments were also made in forest monitoring, database systems, and mapping (e.g., through the GIS infrastructure).

NOTES: **OBS 4/06:** In order to avoid chronic shortfalls in achieving stated management objectives,

CNNF could re-evaluate current goals and objectives in light of budgetary resources and make adjustments accordingly, to either goals or budgets, such that forest plan objectives are achievable given funding levels.

**5.2 Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.**

**Criterion Level Remarks:** Minor non-conformance

<p>5.2.a. Opportunities are given to local, financially competitive, value-added processing and manufacturing facilities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All purchasers and service providers are located within the region of CNNF's forests, typically within a 100-mile radius of CNNF lands.</p> <p>With the exception of Stora Enso, NA, all other timber sales are purchased by small businesses as defined by the Small Business Administration. Because of the various capabilities of sale purchasers, CNNF develops a variety of timber sale types and sizes to provide work opportunities suited to the variety of logging businesses in the region. The average volume of a timber sale is 1.5 to 2 million board feet.</p> <p>The Code of Federal Regulations requires that CNNF include only loggers that have demonstrated sound business practices in CNNF's bidder pool.</p>
<p>5.2.b. When non-timber products are harvested, the management and use of those products is incorporated into the management plan.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Harvesting of non-timber forest products (termed Special Forest Products on CNNF) is addressed in the LRMP (p. 2-13). Conifer boughs, firewood, and "princess" pine (<i>Lycopodium obscurum</i>) moss are the three primary non-timber forest products harvested by private individuals. Additionally, Christmas trees, twigs/stems, seedlings, cones, and posts are also harvested. Restrictions on harvesting these resources in sensitive areas are included in the LRMP. Collecting Regional Forester Sensitive Species is restricted by the LRMP. Supplement R9 Cheni 2409.18-2004-1 contains directions on harvest methods for boughs, firewood, and <i>Lycopodium</i>, among other resources. These directions are also supplied to the permittee.</p> <p>Non-timber product harvests are monitored with a permitting process that records location and includes a harvest limit. Other than tracking the number of permits and estimated harvest quantities, no determination of total allowable harvest levels of these products has been made to ensure that harvest levels are within sustainable levels (see Objective 2.5 of the LRMP) (<b>CAR 3/06</b>).</p>
<p>5.2.c. New markets are explored for products from common but underutilized forest species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF offers products for sale by bid on the open market. All timber products of merchantable size can be sold. CNNF has no need to pursue new markets for underutilized species since all upland species have markets. CNNF has chosen not to harvest in forested wetlands in order to</p>

	manage these areas for other considerations.
NOTES: <b>CAR 3/06:</b> CNNF shall develop an effective strategy for ensuring that each non-timber forest product harvested on its lands (especially <i>Lycopodium</i> and sheet moss) is harvested at sustainable levels. These levels shall be developed to ensure that localized populations of these resources are not jeopardized.	
<b>5.3 Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</b>	
<b>Criterion Level Remarks:</b> Conformance	
5.3.a. Adequate quantities and a diversity of size classes of woody debris (considered a reinvestment of biological capital under this criterion—not an economic waste) are left on the forest floor to maintain ecosystem functions, wildlife habitats, and future forest productivity.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Topwood and non-merchantable larger material is left scattered across the site at levels consistent with regional norms within these second-growth forest cover types. In areas where there was some mortality of early successional species (e.g., aspen, spruce), larger woody debris is found on the forest floor. One of the LRMP Guidelines is to protect existing downed logs greater than 10 inches in diameter within sale units. However, it is possible that there is some deficiency in the quantity of larger woody debris. CNNF has not developed quantitative guidelines for retention of desirable woody debris (<b>OBS 5/06</b>).</p> <p>See also Criterion 6.3.c findings.</p>
5.3.b. The loss and/or waste of merchantable forest products is minimized.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>On virtually all CNNF timber sales, products are processed at the stump and merchantable material is removed. Based on field observation, waste of merchantable products is exceptionally low on CNNF sale units. All CNNF sales are sold as lump sum, where the purchaser pays for the estimated harvest volume in advance. Thus, there is the incentive for the purchaser to extract all merchantable products. Even on those sales where there were minor amounts of merchantable material remaining after harvest, CNNF had been paid for this volume on a lump sum basis. Stump heights were typically low. On active units, products were observed sorted into pulpwood, boltwood, and sawtimber at the landing.</p> <p>Contract utilization standards are found in sections AT2 and BT2.2 of the timber sale contract.</p>
5.3.c. Harvest practices minimize residual stand damage.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Based on field observation, residual tree damage and adverse soil impacts are minimal. CNNF uses seasonal restrictions requiring frozen ground to avoid soil compaction on sensitive mineral soils (e.g., those with a silt cap). CNNF does not harvest within wetlands. See Indicator 6.3.c.2 findings regarding soil damage.</p> <p>CNNF does not have guidelines for assessing the</p>

	<p>acceptability of residual tree damage (<b>OBS 6/06</b>). Across the Forest, sale administrators had different definitions of what constituted damage (ranging from wounds 50-100 square inches in area) and stated that it was at the discretion of the individual sale administrator as to what constituted unacceptable damage. A measure of consistency is developed through the timber sale reviews conducted by Supervisor's Office staff. These sample several timber sales on 1-2 Districts per year, evaluating the effectiveness of the harvest administration, among other concerns.</p> <p>During the harvest, sale administrators commonly mark for harvest trees that are badly damaged and charge the operator for these. Records of these additional trees are kept in the sale file.</p>
<p>NOTES: <b>OBS 5/06:</b> CNNF could develop quantitative guidelines for woody debris retention that can be used throughout the Forest to ensure that adequate quantities are maintained on harvest areas.  <b>OBS 6/06:</b> CNNF could develop definitions of acceptable residual tree damage to ensure consistency in evaluation across the Forest.</p>	
<p><b>5.4 Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>5.4.a. Forest management diversifies forest uses and products, while maintaining forest composition, structures, and functions.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The USDA Forest Service, operating under various legislative acts (e.g., Multiple-use Sustained Yield Act of 1960) produces a diversity of ecosystem goods and services. They are considered to be the largest providers of forest goods (e.g., timber, pulpwood) and services (e.g., recreation, water quality and quantity) operating under one organizational structure in the United States. The CNNF helps contribute to a diverse economy and a sizable economic impact in the region. This can be attributed primarily to investments and expenditures associated with lumber and wood products manufacturing and recreational activities.</p> <p>Since these goods and services depend on a healthy and sustainable forest, items such as forest composition, structures, and functions are a prime consideration in the CNNF LRMP. The CNNF does an excellent job of addressing these issues and implementing plan directives despite the fact that they are constrained via lawsuits and other circumstances (e.g., funding levels, deer herbivory) from fully reaching their stated goals. Some of these constraints are, at least temporarily, out of their control (e.g., litigation). However, they are making clear and determined steps in trying to overcome these obstacles.</p>
<p>NOTES: None</p>	
<p><b>5.5 Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance.</p>	

<p><i>Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF Forest Plan provides explicit objectives, standards, and guidelines for maintaining, enhancing, and restoring forest ecosystem composition, structure, and function. Field sites and supporting documentation provided ample evidence of CNNF's efforts to maintain and enhance forest ecosystem services and resources such as watersheds and fisheries, and indicated that there were no gaps associated with this Criterion. The CNNF is bound by law to care for these services and resources, and appeared to have the staff and resources dedicated to those tasks. Among the sites visited by the team was the Deerskin River Project, a cold water stream restoration effort that removed or repositioned old and ineffective stream structures, stabilized stream banks to reduce sedimentation, and selectively removed encroaching tag alder to improve habitat conditions for native aquatic species (e.g., brook trout) and recreational access. At another site (Elvoy Creek), the CNNF replaced an old stream crossing containing undersized culverts with a new aluminum box culvert to reduce road failures and sedimentation, improve fish passage, and restore approximately 500 ft of stream channel. The CNNF also removed an old logging dam along Elvoy Creek to restore approximately 600 ft of the creek to a natural free-flowing condition, and reconstructed an impoundment on Lynch Creek to more effectively manage waterfowl and other wetland species. The audit team visited Black Lake, one of several sites where the CNNF is restoring large woody debris (LWD) to lakes with the goal of enhancing spawning, feeding, and cover habitats for fish. As part of its Special Area Management Program, CNNF recognizes and protects 41,000 acres and approximately 228 miles of Wild, Scenic, and Recreational River Corridors. Additionally, the CNNF has used prescribed burning to enhance open habitats for the reintroduced Wisconsin elk herd and is considering similar open habitat management projects for the former Clam Lake ELF site.</p> <p>To accomplish these restoration, enhancement, and maintenance projects, CNNF uses internal staff, resources, and financing (e.g., Forest Roads and Trails 10% Program for improving stream crossings) as well as partnerships with a variety of partners, including WDNR, the Rocky Mountain Elk Foundation, Trout Unlimited, Great Lakes Indian Fish and Wildlife Commission, and others.</p>
<p>NOTES: None</p>	
<p><b>5.6 The rate of harvest of forest products shall not exceed levels that can be permanently sustained.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance.</p>	
<p>5.6.a. The sustainability of harvest levels is based on growth and regeneration data, site index models, soil classification, and/or</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 2004 LRMP developed a 10-year Allowable Sales</p>

<p>desired future conditions. The required level of documentation is determined by the scale and intensity of the operation.</p>	<p>Quantity (ASQ). The ASQ was revised for this plan to adjust for changes in age and size classes, and new landscape-level goals for species compositions and forest structure. The ASQ resulted from modeling efforts to achieve a future forest condition that meets desired ecological conditions. The ASQ was limited to lands suitable for timber management (see Appendix M of the FEIS) and constrained to meet Forest-wide management goals (of which appropriate species and age class distributions are a fundamental goal) as detailed in Table B-2 of the FEIS. Approximately 70% of the tentatively suited forest land is available for timber harvest.</p> <p>The ASQ was calculated using the SPECTRUM model (a linear programming model). SPECTRUM model constraints by Management Area are shown in Table B-3 of Appendix B of the FEIS. Growth rates are derived from the TWIGS model as corrected by data from Forest Inventory and Analysis plots on CNNF lands. Timber sale data over the past 10 years was used to “ground truth” model growth predictions.</p> <p>CNNF diligently worked to ensure that the data going into the SPECTRUM model was as accurate as possible to avoid the problems recognized in the 1986 LRMP (poor data on volume yields per acre and suited acreages) that affected the accuracy of the model. At the time the model was run for the 2004 LRMP, CNNF estimates that 85% of the stand exam data (compex) was no more than 10 years old.</p>
<p>5.6.b. After the species composition and the age-class (see Glossary) distribution commensurate with long-term sustainability have been achieved, harvest and growth records demonstrate that the volume harvested during any 10-year span is less than the net growth accumulated over that same period. Exceptions to this constraint may be granted to forest owners or managers whose periodic cycle of re-entry is longer than 10 years. In such cases, allowable harvest is determined by examining the volume of re-growth and removal since the previous harvest and the forest owner or manager’s commitment to allow an equivalent amount of re-growth before additional harvests.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>CNNF is not yet at a desirable age class distribution for most of the forest cover types. Actual harvest levels on CNNF are well below annual ASQ, which itself is estimated to capture only 53% of net growth over the first decade of the LRMP.</p>
<p>5.6.c. If rates of harvest are temporarily accelerated to compensate for or prevent unacceptable mortality, or in cases of salvage operations (see Indicator 6.3.c.4), the rate of future harvest is recalculated accordingly to meet desired future conditions, and the adjusted rate of harvest</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Even with CNNF’s spruce decline salvages, CNNF remains well below its ASQ (even though salvage volume is not required to be counted toward meeting ASQ). CNNF stated that increased harvests in spruce decline areas were offset by reduced harvests in other cover types due to staffing and</p>

is implemented within three years of the temporary acceleration.	funding constraints and legal challenges on new projects.
NOTES: None	

<b>PRINCIPLE 6. ENVIRONMENTAL IMPACT- 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.</b>	
<b><i>Criteria and Indicators</i></b>	<b><i>Findings</i></b>
<p><b>6.1 Assessment 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.</b></p> <p><i>Applicability Note: Small forest owners or managers who practice low intensity forestry may meet this requirement with brief, informal assessments. More extensive and detailed assessments (e.g., formal assessments by scientists) are expected by large forest owners or managers and/or those who practice more intensive forestry management (see Glossary).</i></p> <p><b>Criterion Level Remarks:</b> Minor non-conformance. Non-conformances were associated only with Additional Considerations and therefore did not result in CARs.</p>	
<p>6.1.a. Using credible scientific analyses and local expertise, an assessment of current conditions is completed to include:</p> <ul style="list-style-type: none"> <li>▪ Disturbance regimes and successional pathways;</li> <li>▪ Unique, vulnerable, rare, and threatened communities;</li> <li>▪ Common plants, animals, and their habitats;</li> <li>▪ Sensitive, threatened, and endangered species and their habitats;</li> <li>▪ Water resources; and</li> <li>▪ Soil resources (see also Indicators 7.1.a and b).</li> </ul>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF assesses current conditions at multiple levels. First, the current LRMP (e.g., Chapters 2 and 3) and FEIS provide a broad overview of current conditions, including terrestrial ecosystem components and landscape patterns (e.g., Management Areas (MA's), forest composition and structure, disturbance regimes and successional pathways); aquatic, riparian, and wetland ecosystems and habitats; soil resources; common flora and fauna; sensitive, threatened, and endangered species and habitats (e.g., RT&amp;E, RFSS, MIS, MIH); and Special Management Areas (e.g., wilderness; research natural areas; old growth and natural features complexes; wild, scenic, and recreational river corridors).</p> <p>Second, whenever a specific management activity (Project) is proposed, a rigorous process, legally required by the 1976 NFMA and the 1969 NEPA, is initiated requiring production and publication of an EIS or Environmental Assessment (EA) which evaluate potential and actual environmental and social impacts of planned forest management activities. Thus, as different projects with proposed management activities come up for mandated review, those portions of the forest subject to active timber management receive a comprehensive assessment of current conditions.</p> <p>This process includes an assessment of current and historical physical and biological resources. The "Boulder Project Draft EIS" and supporting Biological Evaluation (BE) were evaluated as an example of the adequacy of assessment of current conditions. Chapter 3, "Affected Environment" was an exemplary example of a thorough,</p>

	<p>comprehensive, and professional evaluation of current and historical conditions and was based on comprehensive reviews of existing literature and local expertise. Included in the assessment were: description of soil and aquatic resources, vegetation structure and composition as affected by ecological processes and human activities, historical disturbance regimes, natural disturbance factors, introduced and natural insects and diseases, and biological diversity, including identification of federally-listed RT&amp;E species and RFSS. The accompanying BE also provides a comprehensive, scientifically-based evaluation of potential project effects on each federally-listed RT&amp;E species and RFSS (including their habitats). Evaluations for each species include the boundary and scale of effects analyses, thresholds of effects, determination of effects, and project design features to protect species.</p> <p>Third, CNNF provides a description of current stand conditions and associated physical and biological features within its sale unit prescription documents. Descriptions include but are not limited to stand area, composition and structure, year of origin, soil and water resources, and the presence of RT&amp;E species and RFSS. CNNF has recently developed a forest-wide sale prescription form to provide uniform assessments of current conditions within sale areas.</p>
<p>6.1.b. Using available science and local expertise, the current ecological conditions are compared to both the historical conditions and desired future conditions within the landscape context. This comparison is done by employing the baseline factors identified in 6.1.a.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Within the LRMP as well as EIS's or EA's mandated prior to execution of specific management activities (e.g., Boulder Project Draft EIS), current ecological conditions are compared to historical (natural and human-induced) conditions within a landscape context. These comparisons include factors identified in Criterion 6.1.a. as well as others. See also Indicator 6.1.a findings.</p> <p>CNNF describes future desired conditions for each sale area within its sale unit prescriptions.</p>
<p>6.1.c. Prior to the commencement of management activities, potential short-term environmental impacts and their cumulative effects are evaluated.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Within the EIS or EA mandated prior to execution of management activities, CNNF comprehensively evaluates potential short- and long-term environmental impacts and cumulative effects, including both direct and indirect effects. The "Boulder Project Draft EIS" (the latest EIS produced by CNNF at the time of the test evaluation) and supporting Biological Evaluation (BE) were evaluated as an example of the adequacy of environmental impacts and cumulative effects evaluations. Chapter 4, "Environmental Consequences" was a thorough and scientifically-based evaluation of both short-term and long-term environmental impacts as well as cumulative effects. This evaluation considers environmental impacts and cumulative effects for each management option (alternatives) considered in the EIS (Chapter 2: Alternatives Including the Proposed Action).</p>

	<p>CNNF's cumulative effects analyses have been appealed, successfully and unsuccessfully, in the past. For those projects successfully appealed, CNNF revised and expanded their cumulative effects analysis. In another example, the Sunken Moose Project was appealed and then successfully settled by CNNF and the litigants out of court (i.e., CNNF agreed to defer timber harvest in some areas to protect goshawk and songbird habitat.) CNNF follows the legally-mandated process, and has recently revamped its NEPA evaluations to more effectively minimize the chances of litigation.</p>
<p>6.1.d. Using assessments derived from the above information, management options are developed and implemented to achieve the long-term desired future conditions and ecological functions of the forest (see also Criterion 7.1).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The LRMP describes long-term desired future conditions, both forest-wide and by Management Area (Chapter 3). Within the EIS or EA mandated prior to execution of management activities, various management options (alternatives) are considered. Each option is evaluated comprehensively for its ability to achieve the long-term desired future conditions and maintain/restore ecological functions of the forest (categorized by soil, water, vegetation, and wildlife resources) while simultaneously avoiding, minimizing, or mitigating undesired environmental impacts. The option chosen is executed in a manner that protects long-term ecological functions (also see findings for Criterion 6.1.c).</p> <p>Assessments by CNNF, as expressed in the documentation described above, include evaluation of regeneration, nutrient cycling, soil compaction and productivity, hydrology, sedimentation and stream flow mechanics, maintenance of appropriate levels of overstory canopy, maintenance of biodiversity, stand succession and distribution of successional stages, vertical and horizontal habitat structure (e.g., diversity of vegetation, snags, coarse woody debris). In sum, these assessments form a comprehensive assessment of, and form the basis for, maintenance and implementation of long-term forest ecological functions.</p>
<p><b>AC 6.1.1.</b> Managers of National Forests use available science and information to prepare a written description of the range and variation in historical forest conditions, spatial patterns and disturbance regimes (reference variation).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The LRMP provides a written description of historical forest conditions across the Forest, including disturbance regimes, by Management Area (Chapter 3). Appendix D of the FEIS (General Assessment of Historic Range of Variability (HRV)) also provides a forest-wide description, supported by scientific literature and expert opinion, of the range and variation in historical forest conditions and disturbance regimes. This document also includes caveats and current knowledge gaps associated with estimating HRV. Further, within EIS's or EA's mandated prior to execution of management activities, CNNF uses available science (literature) and consultation with experts to provide a written description of historic forest conditions and disturbance</p>

	<p>regimes within each project area.</p> <p>CNNF also has designated, described, and protected approximately 184,600 acres of Ecological Reference Areas (i.e., Research Natural Areas, Special Management Areas, Old Growth and Natural Features Complexes) that are maintained in their natural condition and serve as reference sites for historical forest conditions.</p>
<p><b>AC 6.1.2.</b> The description of the reference variation of forest conditions is made available for public review and comment prior to its use in management decisions.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>As required by law, CNNF makes its descriptions of the reference variation of forest conditions available for public review and comment prior to its use in management decisions.</p>
<p><b>AC 6.1.3.</b> Current forest conditions are compared at the landscape scale with the reference variation of forest conditions. Measures of current forest condition include, but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ Area, composition (e.g., species and age class distribution) and spatial representation of ecological types including old growth and late seral forests;</li> <li>▪ Composition and distribution of habitat-related structural elements (e.g. snags, den trees, mast trees, coarse woody debris, thermal and hiding cover).</li> <li>▪ Climate trends and associated effects on assemblages of flora and fauna.</li> </ul>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>To the degree that reliable, scientifically supported information on reference conditions is available, CNNF compares such reference conditions to current conditions at a landscape scale, including area, composition, and spatial representation of ecological types as well as composition and distribution of structural conditions. These comparisons are made both within the broad scope of the LRMP (descriptions of historic, current, and desired future conditions in Chapter 3) as well as during the EIS or EA process for individual projects on the Forest.</p> <p>Although CNNF staff recognize the potential influence of climate trends and change on 1) current forest conditions, and 2) the ability to achieve desired future conditions across the Forest, no formal consideration of climate effects on forest conditions has been incorporated into forest-wide or project assessments.</p>
<p><b>AC 6.1.4.</b> The effects of national forest management activities on neighboring lands, as well as the effects of activities in surrounding lands on national forests, are included in the scope of environmental impact assessments on National Forests.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF has given some forest-wide consideration to effects of its activities on neighboring lands as well as the effects of activities on surrounding lands on CNNF. For example, CNNF did consider adjacent non-CNNF lands during its viability assessment of RT&amp;E species and RFSS in conjunction with revision and subsequent adoption of the LRMP (Forest Plan FEIS: Chapter 3).</p> <p>The audit team also examined DEIS's, SEIS's, BE's, and other supporting documentation for the CNNF's "Boulder," "Northwest Howell," and "McCaslin" Projects to determine if CNNF considers environmental effects of its project-level management activities on neighboring lands, as well as the effects of activities in surrounding lands on CNNF. Evidence from all three projects indicates that CNNF quantitatively addresses landscape-level effects of its activities on habitat for RT&amp;E species and RFSS. CNNF</p>

	<p>acknowledges that “There may be times when action on the forest may affect suitability of habitat outside of the CNNF. Conversely, actions on other lands may contribute cumulative effects with actions occurring on National Forest lands” (Northwest Howell and McCaslin Projects Appendix C, pg. 6). For all three projects, CNNF evaluated and categorized habitat suitability for RT&amp;E species and RFSS on adjacent and other ownership lands within the surrounding landscape for the purposes of cumulative effects analyses (e.g., Table 1 in the Northwest Howell SEIS Supplemental BE, Appendix B). These evaluations included inspection of remote sensing data (e.g., aerial photographs, WISCLAND Land Cover data) as well as field visits by CNNF staff. However, as noted by CNNF staff in the EIS’s, comprehensive data on adjacent and other ownership lands including age structure within each forest type category, specific management history, and future management plans typically are not available. The CNNF is currently in the midst of collecting and maintaining data on other lands within the proclamation boundary and within a five-mile radius of their exterior boundary.</p> <p>Current CNNF EIS’s also give some general consideration to potential landscape-level effects of its proposed management options on other forest conditions in addition to RT&amp;E and RFSS habitats. For example, when evaluating alternatives for desired future conditions within the Boulder Project Area, CNNF acknowledged public concern that the amount of aspen at the State and Forest level has been steadily declining over the past 50 years. Air Quality, Fish, and Social and Economic analyses within the EIS’s also give general consideration to potential effects of the proposed projects on adjacent resources.</p> <p>However, these EIS’s do not appear to quantitatively evaluate short-term or cumulative environmental effects of CNNF’s proposed management options on vegetation, soils, recreation, and other resources on adjacent land ownerships. For example, the geographic area considered by CNNF for most short-term and cumulative environmental effects in the Boulder DEIS was “that portion of the CNNF that is designated Management Area 2C” (e.g., Boulder Project DEIS, pg. 73). With the exception of RT&amp;E and RFSS habitat conditions (discussed above), CNNF also does not appear to quantitatively evaluate effects of activities in surrounding lands on the Forest. As noted above, data availability may currently limit the degree to which CNNF can effectively evaluate these effects at a landscape level. However, CNNF needs to continue to improve their capability in this area.</p>
<p><b>AC 6.1.5:</b> Intensive (e.g. results in significant alteration to the ecosystem) uses and forest management activities are allocated to those lands with relatively</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF uses information developed through environmental assessments described above to designate Management</p>

<p>lower ecological sensitivity.</p>	<p>Areas (MA's: Chapter 3 of the Forest Plan) with the expressed purpose of matching management objectives and activities to specific geographic areas based on historical conditions and disturbance regimes, current ecological characteristics, and environmental sensitivities. CNNF purposely tailors its management objectives and prescriptions to avoid and prevent impacts to streams and riparian areas, wetlands (including vernal pools), erosion-prone topographies and soil types, and other ecologically sensitive areas. Wetlands are specifically excluded from forest management activity. Additionally, Appendix M of the Plan FEIS identifies over 26,000 acres of RT&amp;E species and RFSS habitat that is not appropriate for timber management.</p>
<p>NOTES: Non-conformances were associated only with Additional Considerations and therefore did not result in CARs.</p>	
<p><b>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</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>6.2.a. Although species that are state and/or Federally listed as threatened, endangered, of special concern, or sensitive, and their habitats are identified, their specific locations remain confidential.</p> <p><i>Note: On public forests and large private forests, the general locations of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species are made available to the public.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF maintains in the LRMP a list of federally-listed RT&amp;E species, Regional Forest Sensitive Species (RFSS), Management Indicator Species (MIS), Management Indicator Habitats (MIH), and other sensitive species and habitats that potentially or actually occur on the Forest. CNNF obtains locations of these species and communities through on-the-ground surveys by staff and local and regional experts, querying the WDNR Natural Heritage Inventory database, and consultations with WDNR Bureau of Endangered Resources (BER), USFWS, and other appropriate agencies.</p> <p>Location(s) of actual or potential occurrences of RT&amp;E species and communities, sensitive species and communities, and RFSS are maintained by the CNNF. District-level data on these locations are regularly reported to the manager of the Forest-level GIS database for mapping purposes. CNNF shares data on locations of such species with the WDNR Natural Heritage Inventory database and WDNR BER staff. Although actual or potential occurrences of these species and communities on the Forest are made public by legal mandate during the preparation of EIS's and supporting Biological Evaluations (BE), data on specific locations are restricted to appropriate staff.</p> <p>Within the LRMP and supporting documents (e.g., Chapter 2 of the Plan and Appendix J of the Plan FEIS) CNNF has comprehensively described 1) habitat descriptions and key habitat elements for each species, and 2) standards and guidelines for their management and protection based on scientifically credible sources (e.g., scientific literature,</p>

	<p>expert opinion).</p> <p>CNNF biologists train staff on the identification of RT&amp;E species and RFSS as well as their habitat requirements. As an example, training has been provided to timber sale prep staff on identification of large stick nests. CNNF has also produced a CD and pocket guide to identify important American Marin habitat elements. These materials are also provided to contract timber markers. Although there was anecdotal evidence that contractors (e.g., timber markers) have reported occurrences of such species to CNNF staff during sale layout and timber harvest activities, contractors appear to be only informally and irregularly trained on the identification of such species and their habitats or procedures for reporting their detection (<b>OBS 7/06</b>).</p>
<p>6.2.b. If scientific data indicate the likely presence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive populations, either new surveys are carried out before field-management activities begin or the forest owner or manager assumes their presence and makes appropriate modifications in forest management.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Whenever a management activity (Project) is proposed by CNNF, a rigorous process, legally required by the 1976 NFMA and the 1969 NEPA, is initiated requiring production and publication of an EIS or Environmental Assessment (EA) which evaluate potential and actual environmental impacts of planned forest management activities. As part of this process, a legally-mandated Biological Evaluation (BE) is made to determine whether federally-listed RT&amp;E plant or animal species, RFSS, or other sensitive species or communities are present, potentially present, or likely to be impacted by the proposed activities. This pre-project evaluation includes extensive determination by CNNF specialists of potentially suitable habitat for each species, querying local and regional databases (e.g., WDNR Natural Heritage Inventory database), searches by CNNF specialists, and assessments by local and regional experts for presence or potential presence of such species or communities. The BE includes legally-required and extensive analyses of potential impacts associated with planned management activities on these species, and standards and guidelines to protect such species and their habitats. Biological Assessments may also be requested by interested third parties regarding potential impacts of proposed management activities upon RT&amp;E species, RFSS, or other sensitive species and communities.</p> <p>As legally mandated by the ESA, CNNF also consults with the USFWS to determine if the proposed management activities are likely to: (1) adversely affect federally-listed species or designated critical habitat; (2) jeopardize the continued existence of species proposed for listing; or (3) adversely modify proposed critical habitat. The USFWS in turn provides a Biological Opinion (BO) regarding impacts of planned management action. BO's may include requirements for mitigation or alteration of management activities and are binding, pending resolution of (any) appeals by the USDA Forest Service or other parties.</p>

	<p>If the pre-project BE indicates the potential (i.e., potentially suitable habitat) or known occurrence of federally-listed, RFSS, or other sensitive species within the project area, CNNF botanists and wildlife specialists conduct extensive on-the-ground surveys, using scientifically accepted protocols, to confirm presence and determine exact location(s) of these species. If such species are identified, their specific locations are mapped by CNNF and shared with the WDNR Natural Heritage Inventory and other appropriate agencies. CNNF then conducts management activities compatible with protection, maintenance, improvement, or restoration of species and their habitats following the standards and guidelines set forth for each species in the Forest Plan and supporting documents.</p> <p>The audit team examined the Sunken Moose Project and Boulder Project EIS/BE to determine conformance with these procedures. In both cases the CNNF conducted extensive pre-project BE's for federally-listed RT&amp;E species, RFSS, and other sensitive species and communities. CNNF consulted with USFWS regarding federally-listed species. Extensive on-the-ground surveys were conducted for such species in potentially suitable habitat, locations of occurrences mapped, and protective design features incorporated into management prescriptions based on Plan standards and guidelines. Field interviews with CNNF staff and examinations of several sale harvest areas indicated that these protective measures were being consistently implemented.</p> <p>Although intensive and extensive on-the-ground surveys are conducted for RT&amp;E species and RFSS prior to the initiation of management activities, the legally-mandated EIS/BE process, including public review and comment, often results in time lags of 2-3 years between when survey efforts are conducted and the start of management activities (i.e., project approval). During this interval, mobile species (e.g., raptors) not present during initial surveys may subsequently occupy stands within the project area. Discussions with CNNF staff indicated that this has occurred on occasion, suggesting the need for follow-up surveys closer to the time of project initiation (<b>OBS 8/06</b>).</p>
<p>6.2.c. For management planning purposes, forest owners or managers of publicly owned and large privately owned forests use, participate in, or carry out on-the-ground assessments for the occurrence of state and/or Federally listed as threatened, endangered, of special concern, or sensitive species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Biological Evaluation's are conducted to determine whether federally-listed RT&amp;E plant or animal species, RFSS, or other sensitive species or communities are present, potentially present, or likely to be impacted by the proposed activities. BE's include extensive determination by CNNF specialists of potentially suitable habitat for each species, including on-the-ground searches by CNNF specialists, and assessments by local and regional experts for presence or potential presence of such species or communities. See</p>

	findings associated with Criterion 6.2.b
<p>6.2.d. Where they have been identified, state and/or Federally listed as threatened, endangered, of special concern, or sensitive species and their habitats are maintained and/or restored. Multiple-use management activities are acceptable, where the law allows, in these species' habitat areas to the extent that they are compatible with maintenance and restoration of the species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>During the EIS/BE process and consequent on-the-ground surveys, stand and landscape level evaluations are made of potential effects on habitats of existing RT&amp;E species, RFSS, and other sensitive species and communities. Within the LRMP and supporting documents (e.g., Chapter 2 of the Plan and Appendix J of the Plan FEIS) CNNF has comprehensively described 1) habitat descriptions and key habitat elements for each species; and 2) standards and guidelines for habitat management and protection based on scientifically credible sources (e.g., scientific literature, expert opinion). Appendix M of the Plan FEIS also identifies over 26,000 acres of RT&amp;E species and RFSS habitat that is not appropriate for timber management. These design features are incorporated into the EIS/BE for each project area. If reserve areas, buffers, or other protection zones (e.g., conservation zones) are deemed necessary to protect habitats for these species, size and location of such zones are identified, mapped, and protected. Connectivity within the landscape of such zones is evaluated and protection is afforded at this level if deemed necessary. CNNF then conducts management activities compatible with protection, maintenance, improvement, or restoration such species and their habitats.</p> <p>The audit team visited several sale areas where RT&amp;E species or RFSS occurrences had been documented during the pre-project EIS/BE or were previously known to occur. Protection strategies were consistently implemented following LRMP guidelines. Prescriptions to protect habitats of these species were clearly indicated in the sale contract and harvest prescriptions. Reserve areas, buffers, and other conservation zones were clearly marked on both the sale area maps and on the ground (i.e., paint marks indicating the boundaries of reserve areas).</p> <p>CNNF also has demonstrated responsiveness to public concerns regarding its protection of habitats for RT&amp;E, RFSS, and other sensitive species. For the Sunken Moose Project within the Washburn Ranger District, CNNF performed an extensive, legally-required EIS/BE following procedures described in Criterion 6.1.b. CNNF consulted with USFWS regarding federally-listed species and received a "No Effect" determination regarding these species. CNNF also conducted database searches of known occurrences, extensive habitat analyses and/or ground surveys for RFSS wildlife species likely to occur in the project area, including northern goshawks, red-shouldered hawks, Connecticut warblers, and other species. Approximately 16,000 acres of land proposed for management within the project area were determined to have habitat potential for known or likely-to-occur RFSS plant species. All of these acres were</p>

	<p>extensively surveyed, resulting in 6 plant locations documented and mapped. Design features following Plan standards and guidelines were identified for the protection of these species. Although the BE determined that the proposed project would not result in negative impacts to RT&amp;E or RFSS, interested third parties initiated an administrative appeal of the Project, citing concerns about habitat protection for forest interior birds including northern goshawks and red-shouldered hawks. In response, CNNF managers successfully negotiated an agreement with these parties by which timber harvest was deferred for 10 years in about 9% of the project area to provide potential habitat for these and other species. In addition, CNNF agreed to conduct additional on-the-ground surveys for these species within the deferred areas.</p>
<p>6.2.e. If a state and/or Federally listed as threatened, endangered, of special concern, or sensitive species is determined to be present, its location is reported to the manager of the species' database.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Location(s) of actual or potential occurrences of RT&amp;E species and communities, sensitive species and communities, and RFSS are maintained by the CNNF. District-level data on these locations are regularly reported to the manager of the Forest-level GIS database, which is updated at least annually. CNNF also provides these locations to the WDNR Natural Heritage Inventory database.</p>
<p>6.2. DOD/DOE 1. Forest areas that are slated for resource extraction or development are surveyed for Rare species and Rare plant community types (see Glossary) where survey protocols exist. Surveys are kept up to date.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Federal mandates require that National Forests conduct EIS's or EA's for areas slated for resource extraction. These impact statements and assessments contain information on known and potential occurrences of RT&amp;E species and RFSS within the proposed project area. Prior to management activities, CNNF biologists evaluate the entire project area for habitat potentially suitable for RT&amp;E species and communities and RFSS. CNNF uses scientifically-trained teams of wildlife biologists, botanists, and other specialists to survey these potentially suitable habitats for occurrences of RT&amp;E species and communities and RFSS. Additionally, CNNF staff query the WDNR Natural Heritage Inventory database for known and potential occurrences of these species and communities and consult with local and regional experts.</p>
<p>6.2. DOD/DOE 2. A landscape-level conservation and restoration analysis is completed.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 1999 Landscape Analysis and Design (LAD) report for CNNF provides a landscape-level ecological assessment of the Forest. The LAD report provided the strategy for conducting landscape design in the current LRMP. During the process leading to the development of the current Plan, CNNF also conducted a landscape-level viability assessment of RT&amp;E species and RFSS, focusing on conservation and restoration measures needed to maintain viable populations of these species (Forest Plan FEIS: Chapter 3 and Appendix J). The CNNF also has formulated</p>

	landscape connectivity maps for northern hardwood ecosystems (see Chapter 3 and Appendix P of the FEIS).
6.2. DOD/DOE 3. Where the regional protected areas system, late-successional and old-growth forests, and/or habitat for recovering Rare species or plant community types are inadequately represented to ensure their long-term viability across the landscape, management for these attributes is given a priority.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF has conducted thorough landscape-level viability assessments for RT&amp;E species and RFSS. Through these assessments CNNF has determined that habitat conditions for RT&amp;E species and RFSS dependent on late-successional and old growth forests are expected to remain stable and improve under the current Forest Plan. The Plan identified and protected approximately 152,000 acres of Ecological Reference Areas (i.e., Research Natural Areas, Special Management Areas, Old Growth and Natural Features Complexes). CNNF estimates that strong overlap exists between rare species and these reference areas. In fact, 42% of known rare plant locations are in these areas. In addition to 85,500 acres of Old Growth and Natural Features Complexes specifically identified and protected by CNNF, a major objective of the current Plan is to maintain and enhance adequate representation of late-successional and old growth forests at a landscape level. CNNF is taking proactive short-term and long-term steps to afford long-term ecological representation across the landscape, prioritizing management and protection of these species and habitats.</p>
<b>AC 6.2.1.</b> A comprehensive list of the species of interest and species of concern (e.g., species with notable conservation need) is maintained for each National Forest. Managers demonstrate through polices and actions that said species, and the ecological systems that support the species, are duly considered in the course of forest management.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF maintains a comprehensive list of state- and federally-listed RT&amp;E species, RFSS, and other sensitive species and communities. These species and their habitats are proactively identified and mapped across the CNNF. CNNF has developed and proactively implements policies and procedures to protect these species and their habitats (also see findings for Criteria 6.2a-e).</p>
<p>NOTES: <b>OBS 7/06:</b> CNNF could consider formal training of contractors on: 1) identification of RT&amp;E species, RSFF, and other sensitive species and communities; and, 2) procedures for reporting the detection of such species to CNNF staff.</p> <p><b>OBS 8/06:</b> When significant time lags occur between pre-project on-the-ground surveys for RT&amp;E species or RFSS and the commencement of management activities, CNNF could conduct additional surveys to confirm the continued presence or absence of such species.</p>	
<p><b>6.3 Ecological functions and values shall be maintained intact, enhanced, or restored, including:</b></p> <p><b>a) Forest regeneration and succession.</b></p> <p><b>b) Genetic, species, and ecosystem diversity.</b></p> <p><b>c) Natural cycles that affect the productivity of the forest ecosystem.</b></p>	
<p><b>Criterion Level Remarks:</b> Minor non-conformance. Non-conformances associated with Additional Considerations did not result in CARs.</p>	
<p><b>6.3.a. Forest regeneration and succession</b></p> <p><i>Applicability Note: Indicators 6.3.a.1. through 6.3.a.4. are intended to be applied sequentially.</i></p>	
6.3.a.1. Forest owners or managers make management decisions using credible scientific information (e.g., site classification) and information on landscape patterns (e.g., land use/land	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF uses landscape and site classification systems, the National Hierarchical Framework of Ecological Units (NHFEU) and the Forest Habitat Type Classification System</p>

<p>cover, non-forest uses, habitat types); ecological characteristics of adjacent forested stands (e.g., age, productivity, health); species' requirements; and frequency, distribution, and intensity of natural disturbances.</p> <p><i>Applicability Note: This indicator may apply only marginally to managers of small and mid-sized forest properties because of their limited ability to coordinate their activities with other owners within the landscape or to significantly maintain and/or improve landscape-scale vegetative patterns.</i></p>	<p>(FHTC), in developing their regeneration and forest structure strategies. In addition, the CNNF has collaborated with scientists at the University of Wisconsin to determine historic regimes of natural disturbances (Appendix D of the FEIS). The CNNF is also well staffed in areas of soil science and plant ecology.</p>
<p>6.3.a.2. Silvicultural practices encourage regeneration that moves the forest toward a desired future condition, consistent with information gathered in 6.3.a.1.</p> <p><i>Note: Development of a forest that is capable of natural regeneration, based on desired future conditions, is encouraged.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF relies heavily on natural regeneration and silvicultural practices are typical of those commonly used to achieve natural regeneration. The landscape on the CNNF is extremely diverse in terms of the potential to support a wide range of forest community types and many successional patterns. In light of management goals and objectives, the CNNF staff use the resources identified in 6.3.a.1 to plan regeneration of appropriate, native species and to conduct silvicultural operations consistent with developing the desired future conditions. Guidelines for these processes are well articulated in the LRMP.</p> <p>Due to legal challenges to some planned management activities, regeneration may not be achieved within desirable time frames (see also Indicator 5.3.b findings).</p> <p>The team observed areas of spruce decline salvage that lacked sufficient regeneration at this time (1-2 years after salvage). CNNF had anticipated these areas would be naturally regenerated to hardwood species, although the potential for this to occur appears low at this time. CNNF has protocols and standards to assess the adequacy of regeneration at 3- and 5-year intervals post-harvest. Thus, poorly regenerated areas would be determined and addressed at those periods. However, based on observation and discussions with CNNF staff, there may be more areas in need of planting than had originally been anticipated (due to the current lack of hardwood regeneration). CNNF plans to modify their monitoring protocols in the spruce salvage units so that regeneration is checked after two years (rather than three years). Although CNNF is confident that all reforestation projects will be adequately funded, a large increase in planting acreage was not forecast (in many of these areas, Knutson-Vandenberg funding for planting had not been planned due to the reliance on natural hardwood regeneration).</p> <p>While CNNF is currently maintaining conformance with the</p>

	<p>Indicator at this time, should unanticipated reforestation costs outstrip available funds, they could fall into non-conformance in the future (<b>OBS 9/06</b>).</p>
<p>6.3.a.3. Measures are taken to ensure the retention of endemic and difficult-to-regenerate species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF has programs in place to address regionally declining tree species and forest cover types such as yellow birch, white cedar, eastern hemlock, Canada yew, and white pine. Efforts are made to concentrate investment of resources to regenerate difficult-to-generate species on the most ecologically appropriate habitat types.</p> <p>Deer browse can be a significant inhibiting factor in establishing regeneration of desired species. CNNF works with the Wisconsin Department of Natural Resources (who sets hunting policy on Wisconsin lands) to encourage liberal deer hunting seasons within CNNF lands. CNNF has used fencing, browse deterrent material (i.e., Plantskyd), and bud capping, where necessary. CNNF also suggests that their goal of increasing interior northern hardwood cover types will reduce deer herd size over time by reducing deer-suitable habitat.</p>
<p>6.3.a.4. Across the forest, or the landscape in which it is located, management actions lead to a distribution of successional stages, age classes, and community types appropriate to the scale and intensity of the operation and desired future conditions.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Desired future conditions, as described in the LRMP, are based on management goals and the ecological potential of individual landscape units and Forest Habitat Types. To implement this approach, the CNNF has been divided into eight Management Areas (MAs), each with its specified Theme, Desired Future Conditions, and management guidelines for achieving them. Many MAs are further subdivided to provide additional management diversification. This approach leads to high probability that all successional stages and age classes will be present on the landscape.</p> <p>The Plan describes desired future age-class distributions for all even-aged forest cover types and desired size-class structure for uneven-aged types. CNNF Objective 1.4e is to increase average vegetative patch size. From CNNF documentation (crosswalk matrix): "Management Areas were allocated to the forest with consideration for current and future availability of contiguous forest patches and connections between large patches."</p> <p>CNNF has Objectives for restoring or emulating natural disturbance in northern hardwood (canopy gaps and groups), pine, and barrens communities.</p> <p>Given current harvest levels, there is the potential to reach a critical age-class imbalance in the near future and not reach the desired future age-class distributions stated in the LRMP. Actual harvest levels on CNNF are well below annual ASQ, which is 131 MMBF. The ASQ harvest rate is estimated to capture 53% of net growth over the first decade</p>

of the LRMP. The FY06 harvest level was 77.7 MMBF (59% of ASQ) and the planned harvest level for FY07 is 70 MMBF (53% of ASQ). This data is part of a downward trend that has developed since at least 2001 where the actual volume offered for sale has declined annually. While CNNF stressed that ASQ was a ceiling and not a goal, the continued decline of harvesting to approximately half of ASQ on areas deemed suitable for timber management appears to indicate that something more than adjusting to mitigate adverse harvest impacts is occurring.

The FY06 actual harvest levels for hardwood and aspen cover types depart most dramatically from the ASQ. Hardwood pulpwood is at 46% of ASQ, hardwood sawtimber is at 30% of ASQ, and aspen pulpwood is at 37% of ASQ. All three of these product categories are expected by CNNF to decline further in FY07. Actual FY06 softwood harvest levels met or exceeded (by 7%) ASQ, which is attributable primarily to the spruce decline salvage harvests. Softwood harvest levels are expected to be close to ASQ again in FY06. Salvage harvesting activities associated with the spruce decline, and subsequent reforestation, has partially offset the discrepancy between a pending age-class imbalance resulting from harvesting well below ASQ, and the desired future age-class distributions stated in the LRMP. While not planned, these activities have resulted in additions to the younger age classes in some species.

Overall, CNNF attributes the decline in the harvest volumes offered for sale to delays caused by project-level appeals and litigation, and to flat budgets for the timber sale program (i.e., the increasing costs of harvest preparation work has reduced the amount of harvest preparation activity that can be accomplished). Additionally, the large departure from ASQ for hardwood sawtimber is partially attributed to sawtimber volume overestimates produced by the harvest modeling. While it is appropriate that actual hardwood sawtimber harvest volumes are based on field conditions, the model overestimation causes some concern. Two of these factors (NEPA appeals and litigation, and flat funding levels) are not expected to change in the near future, which brings into question whether the LRMP objectives can be met within the timeframe of the LRMP.

ASQ is the harvest level that would result from meeting the objectives specified in the SPECTRUM model for the lands suited to timber management. These objectives, such as appropriate age class distributions, were developed and approved when the plan was implemented. Within the even-aged forest cover types, a significant portion of these types consist of older age classes (19-64% depending on cover type). Several of these types already have age classes approaching the extended rotation ages described in the LRMP.

	<p>Failure to address these older age classes in an appropriate manner, as allowed under the ASQ, will have two results: 1) A large component of this even-aged forest will mature at the same time in the next 10-20 years and may be lacking suitable replacement stock, 2) the conversion of even-aged hardwoods to an uneven-aged structure will be impaired due to the lack of vigorous new age classes. Neither of these results is silviculturally desirable. Focusing management activities within these older age classes in even-aged cover types will improve the age class distribution and assist in maintaining the vigor of lands designated as suitable for timber management. Uneven-aged cover types (i.e., northern hardwood) will also be adversely affected by an inability to meet the LRMP objectives. Since these cover types rely on the presence of multiple age classes within a stand to perpetuate themselves, the reduced ability to adequately develop these age classes will impede the development of desirable uneven-aged structure.</p> <p>A concurrent issue is the long time lag between project analysis and harvest completion. Even where a timber harvest project proceeds as planned, CNNF staff estimate it could be 5-7 years before it is completed (which is halfway through the 10-year planning cycle). NEPA analysis typically takes 1-2 years and sale contracts are awarded for 3-5-year periods. If project appeals and litigation occur, this timeframe can be further lengthened (<b>OBS 10/06</b>).</p> <p>Current actual harvest levels are significantly lower than the ASQ harvest levels, which is precluding over-harvesting. However, with this reduced management intensity, that CNNF will be able to meet the age class distributions and forest structure objectives defined in the LRMP appears to be in question (<b>CAR 4/06</b>).</p>
<p>6.3.a.5. When even-aged management (see Glossary) is employed, live trees and native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type (see Glossary). Exceptions may be allowed when retention at a lower level is necessary for purposes of forest restoration and/or rehabilitation or to maintain community types that exist on the site (e.g., oak-hickory, jack pine). The level of retention increases proportionally to the size of the harvest unit.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF has several guidelines for reserve areas and trees within even- and uneven-age management areas (p. 2-14 of the Plan and elsewhere). CNNF also has a guideline to: "Leave 5-15% of potential timber salvage unharvested following large disturbance events (greater than 100 acres), except in salvage situations that are high risk to human safety and/or forest health."</p> <p>The LRMP provides specific guidelines for live tree retention for each of the 8 MAs and their subdivisions. Guidelines specify species, number, and minimum diameters (8 inches to 24+ inches, depending on species and habitat type) for leave trees. For example, in regenerating aspen stands in MA 1, preference is given to conifers in general, and long-lived conifers in particular. When present, entire islands of conifers are retained. In even-aged hardwood regeneration,</p>

	<p>preference is given to species that were underrepresented in the harvested stand. Field observation confirmed that retention guidelines were addressed during harvest preparation work.</p>
<p>6.3.a. DOD/DOE 1. Late-successional and old-growth stands and forest areas of all sizes are identified. Forest management is conducted only to maintain or enhance their late-successional and old-growth composition, structures, and functions.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF has identified late-successional northern hardwood and conifer stands in MA 1-4. Late-successional and old-growth areas as defined by CNNF and the USFS are included in MA 5, 6, and 8G. CNNF has identified areas meeting the Lake States Standard definition of old growth.</p> <p>Plan goals are to develop or maintain late-successional structures and functions, where appropriate, in MA 1-4. MA 5, 6, 8G are not under forest management, although CNNF is evaluating the need for NNIS control. Areas meeting the Lake States Standard for old growth and that are currently outside of the CNNF old growth MA are currently being evaluated as to their status (see Criterion 9.1.a).</p>
<p><b>AC 6.3.a.1:</b> Climate trends and associated effects on assemblages of flora and fauna are considered when developing strategies for retention of endemic species.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Regional ecological consequences of global climate change have not yet been scientifically ascertained for CNNF lands and CNNF has not expressly considered climate change in developing management strategies for their lands. However, CNNF staff is prepared to modify management plans as more information becomes available. Several climate-related studies are currently being conducted on the Forest. For example, CNNF is a partner in the Chequamegon Ecosystem Atmosphere Study (ChEAS), which is focusing on interactions between the atmosphere and the biosphere on the CNNF. See also Indicator AC 6.1.3 findings.</p>
<p><b>6.3.b. Genetic, species, and ecosystem diversity</b></p>	
<p>6.3.b.1. Forest management conserves native plant and animal communities and species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The LRMP addresses many ecosystem attributes and habitat elements, such as snag trees, structural complexity, and species diversity. Woody debris is only weakly addressed. However, pre-existing large woody debris is expected to be protected during harvest operations.</p> <p>For each MA and its subunits, the Desired Future Condition includes conservation of native plant and animal communities. An example from MA 2A: <i>Incorporating snags, den trees, coarse woody debris, super canopy trees, and canopy gaps into the management activities enhances structural diversity. Trees are uneven-aged with a range of tree sizes up to 23 inches in diameter. Sugar maple is the most common species but efforts are made to maintain or restore regionally less common species such as yellow birch, hemlock, and white pine. (LRMP p. 3-8)</i></p> <p>Planted regeneration uses only locally adapted seed and seedlings.</p>

	<p>Field observations provided numerous examples of activities meeting LRMP objectives regarding the conservation of native plant and animal communities.</p>
<p>6.3.b.2. The forest owner or manager cooperates with local, state, and Federal agencies to protect and manage native plant and animal communities and species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Goal 3.3 in the LRMP is: "Cooperate with individuals and organizations, and local, state, tribal, and federal governments to promote ecosystem health and sustainability across landscapes." Objective 3.3c is to: Cooperatively work with federal, state, county agencies and other non-governmental organizations for control of non-native invasive species. Objective 3.3f is to: Collaborate with the US Fish and Wildlife Service in the collection and dissemination of information indicating the possible presence of Canada Lynx and Kirtland's Warbler.</p> <p>The Forest engages in ongoing resource management consultation with the Great Lakes Indian Fish and Wildlife Commission, the US Fish and Wildlife Service, the Environmental Protection Agency, and the Wisconsin Department of Natural Resources. Numerous examples of cooperative initiatives for the conservation of native species and communities were discussed during the test evaluation, including northern blue butterfly with the University of Wisconsin-Green Bay and American marten with Wisconsin DNR and GLIFWC.</p>
<p>6.3.b.3. There is a consistent scientific method for selecting trees to plant, harvest, and retain in order to preserve and/or enhance broad genetic and species diversity.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Genetic and species diversity are maintained through the management of diverse forest communities consisting only of native species. CNNF utilizes natural regeneration whenever feasible to meet management goals. Tree species are managed on sites on which they are well-suited.</p>
<p>6.3.b.4. Forest owners or managers maximize habitat connectivity to the extent possible at the landscape level (e.g., through an ecological classification system, at the subsection or land-type association level).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF management is conducted within the framework of a land classification system (NHFEU) to the landtype association level in forest-wide planning and the vegetative habitat type at the site level. Several Plan guidelines promote enhanced habitat connectivity across the landscape (e.g., increasing interior mature forest patch size, adjacency of harvest units, maintaining long-lived conifer transition zones, etc.). The current and future condition of landscape patterns are discussed in the FEIS (pp. 3-93 to 3-109). Maps showing the connectivity of northern hardwood systems are provided in Appendix P of the FEIS. An example of managed habitat connectivity is in the Moquah Area, where a mosaic of four major community types (grassy openings, shrub, savanna and woodland) are managed for large-scale connectivity.</p> <p>The CNNF contains some of the largest blocks of contiguous forest cover in the area. Their management</p>

	actions and reserve areas provide habitat connectivity at the landscape level. Numerous examples of localized habitat connectivity (e.g., retention areas, RMZs) were observed during the test evaluation.
6.3.b. DOD/DOE 1. Management units and sites that function as ecological refugia (see Glossary) and relict areas (see Glossary), either formally or due to the historical exclusion of management activities, are identified and continue to be managed primarily as such. Forest management is limited to actions needed to support the composition, structures, and functions of the refugium or relict area.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 2004 Plan delineated 149,500 acres (roughly 10% of total forest area) in special management areas (MA 8F) and old growth (MA 8G). An additional 35,200 acres are designated as candidate research natural areas (MA 8E). These areas are managed primarily by allowing natural processes to occur.</p>
<b>AC 6.3.b.1.</b> Forest management practices maintain or restore aquatic ecosystems and habitat features, wetlands, and forested riparian areas (including springs, seeps, fens, and vernal pools).	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 2004 Plan contains numerous guidelines for watershed protection, and for protecting riparian areas and wetlands (pages 2-1 to 2-3). The current and future condition of aquatic systems are discussed in the FEIS (pp. 3-4 to 3-34).</p> <p>No instances of degraded aquatic systems were observed in the field.</p>
<b>6.3.c. Natural cycles that affect the productivity of the forest ecosystem</b>	
6.3.c.1. Biological legacies of the forest community are retained at the forest and stand levels, consistent with the objectives of the management plan, including but not limited to: large live and declining trees, coarse dead wood, logs, snags, den trees, and soil organic matter.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The Forest Plan provides specific standards and guidelines (e.g., numbers, desirable characteristics) for retaining live wildlife den trees, mast trees, and snags during forest management activities. Based on numerous field sites visited by the audit team, CNNF is consistently implementing these guidelines through identification and protection of wildlife den trees and snags (safety permitting) within sale units. Sale unit prescriptions consistently contained language addressing numbers and types of den trees, mast trees, and snags to be retained within stands during harvest, as well as methods to ensure their protection. Further, in instances when CNNF staff have determined that existing snag quantity or quality within stands are inadequate to meet Plan standards and guidelines, CNNF staff have proactively employed techniques (e.g., girdling) to create and/or enhance these structures.</p> <p>CNNF does monitor large forest disturbances (&gt;100 ac) to ensure adequate retention of structure and coarse woody debris (CWD) during salvage operations. However, the current Forest Plan does not provide explicit standards and guidelines for retention of coarse woody debris (CWD) during normal timber harvest operations. Based on examination of numerous upland hardwood stands within sale areas, CNNF is retaining CWD during its harvest operations and such retention appears typical for the region. Interviews with CNNF staff also revealed awareness of the</p>

	<p>need to maintain and protect CWD during forest management activities. However, contrary to efforts for den tree and snag retention, minimum amounts and configuration of CWD currently are not specified by CNNF in sale area prescriptions (<b>OBS 5/06</b>). This is particularly important for younger stands, where both snags and CWD typically are underrepresented structural attributes. See also Indicator 5.3.a findings.</p>
<p>6.3.c.2. Forest management practices maintain soil fertility and organic matter, especially in the A horizon, while minimizing soil erosion and compaction. If degradation of soil quality occurs, as indicated by declining fertility or forest health, forest owners or managers modify soil management techniques.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Forest Service Handbook 2509.18 Chapter 2 contains detailed definitions of detrimental soil impacts. CNNF has a monitoring program for tracking the effects of forest management activities on soils. The Plan contains several guidelines (p. 2-3) for protecting soil productivity. Whole-tree harvesting is only used on 10% of the spruce salvage areas. All other harvesting is conducted with conventional systems that leave topwood in the forest. Frozen ground restrictions are used for sensitive mineral soils. CNNF uses relatively long rotations for even-aged species and has the option to use extended rotations where appropriate. CNNF promotes natural succession, using planting only where desirable seed sources are unavailable.</p>
<p>6.3.c.3. Forest management practices maintain or restore aquatic ecosystems, wetlands (including peatlands, bogs, and vernal pools), and forested riparian areas (see also Criterion 6.5).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 2004 Plan contains numerous guidelines for watershed protection and for protecting riparian areas and wetlands (pages 2-1 to 2-3). The Plan also includes protective guidelines for ephemeral and permanent woodland ponds (page 2-15). The current and future condition of aquatic systems are discussed in the FEIS (pp. 3-4 to 3-34).</p> <p>No instances of degraded aquatic systems were observed in the field. Vernal pools were protected by exclusion from the management area or by sale contract clauses that treated them as riparian areas subject to the BMPs for water quality. Typically, there were no “physical” barriers (such as flag or paint lines) around vernal pools. During certain seasons of the year, when these pools are less noticeable, accidental impact on these areas could occur. There are no formal guidelines (e.g., for buffer widths) for protecting vernal pools less than one acre in area from adverse environmental changes (e.g., increased insolation) that could result from even-aged management systems (<b>OBS 11/06</b>).</p>
<p>6.3.c.4. Responses (such as salvage) to catastrophic events (such as wildlife, blowdown, and epidemics) are limited by ecological constraints.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Current salvage activities are limited to spruce cover types that are dying due to age and insect/disease issues. The Plan contains guidelines to leave 10-15% of salvage areas &gt; 100 acres un-salvaged to provide woody debris and structural diversity. Additionally, on all salvage sites visited, downed woody debris and standing dead snags were observed. CNNF accepts endemic levels of pest populations</p>

and the resulting mortality as a normal component of forest management.

NOTES:

**CAR 4/06:** CNNF shall either develop effective strategies to implement the management practices that will more closely adhere to LRMP harvest levels and move the Forest to the desired future condition specified in the LRMP, or revise their desired future condition goals and ASQ to better reflect the actual management intensity on the Forest.

**OBS 5/06:** (See Criterion 5.3)

**OBS 9/06:** CNNF could develop contingency plans to ensure that adequate future funding is available to reforest areas planned for natural regeneration, but eventually found to lack adequate natural regeneration, without reducing funding for previously planned reforestation projects.

**OBS 10/06:** CNNF could consider strategies for shortening the length of time that transpires between project inception and completion in order to avoid unplanned and potentially significant delays in achieving goals for desired future forest conditions (e.g. age-class distribution),

**OBS 11/06:** CNNF could develop formal buffer width guidelines to ensure that adverse environmental changes to vernal pools smaller than one acre do not occur.

**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.**

*Applicability Notes:*

*When forest management activities (including timber harvest) create and maintain conditions that emulate an intact, mature forest or other successional phases that may be under-represented in the landscape, the management system that created those conditions may be used to maintain them, and the area may be considered as a representative sample for the purposes of meeting this criterion.*

*Ecologically viable representative samples are designated to serve one or more of three purposes: (1) to establish and/or maintain an ecological reference condition; (2) to create or maintain an under-represented ecological condition (e.g., successional phases of a forest type or natural community (see Glossary); and (3) to protect a feature that is sensitive, rare, or unique in the landscape. Areas serving the purposes of (1) and (2) may move across the landscape as under-represented conditions change, or may be fixed in area and managed to maintain the desired conditions. Areas serving the purposes of (3) are fixed in location.*

*For managed forest communities in the Lake States, ecologically mature or late-successional phases (not including old growth) are generally under-represented and would qualify as representative sample areas under purposes 1 and 2. Tolerant or long-lived mid-tolerant species (e.g., white pine.) typically dominate such stands. Depending on the site and forest community, characteristics may include a well-developed understory flora, relative stability of species composition, multi-layered canopies, stable or declining live timber volume, live trees in upper quartile of expected diameter growth for the site, presence of recognized late-successional indicator species (such as certain mosses, lichens or other epiphytes), and accumulation of large snags and large downed woody material. Examples of classification systems that include some of these concepts are: "Types of Old Growth Forests" as defined by Minnesota Department of Natural Resources (<http://www.dnr.state.mn.us/forests/oldgrowth/types.html>), and, Minnesota DNR Old-Growth Forest Policy - Goals and Results, at <http://www.dnr.state.mn.us/forests/oldgrowth/policy.html>. For representative sample areas that may move across the landscape as conditions change (purposes 1 and 2), the length of time that an area is maintained as a representative area will vary with the rarity of the ecosystem type and specific ecological value to be conserved, the uniqueness of the represented condition, the rate at which areas with similar characteristics develop.*

*Examples of representative samples fixed in place and serving purpose 3 include relatively exceptional features such as fens, vernal pools, areas surrounding caves, and areas of special soils containing*

endemic plant species.

*In most cases, intact old-growth (see Glossary) will qualify as representative sample under purpose 3 due to their rarity in the Lake States Region. Unentered old-growth stands (see Glossary) are also prime candidates for designation as representative sample areas under purpose 3. In both cases, the burden is on the landowner/manager to demonstrate that these areas should NOT qualify as representative sample areas under purpose 3. Other very old forests (over 150 years old) that do not meet the Lake States Standard's strict definition of "old growth" (e.g., there is some evidence of past harvesting) should also be considered as potential representative sample areas under purpose 3*

*Forests of all sizes may be conducive to protection of fixed features, such as rock outcrops and bogs. Medium sized and large forests may be more conducive to the maintenance of successional phases and disturbance patterns than small forests.*

*While public lands (see Glossary) are expected to bear primary responsibility for protecting representative samples of existing ecosystems, FSC certification of private lands can contribute to such protection.*

*Representative samples may be protected solely by the conditions of the certificate and/or through the use of conservation easements or other instruments of long-term protection.*

**Criterion Level Remarks:** Minor non-conformance. CNNF is in overall conformance at the Criterion level with a well-designed system of representative areas. The minor non-conformance at the Indicator level was due to CNNF finding additional potential old-growth areas within their databases that they have not yet formally evaluated for potential inclusion as representative areas.

6.4.a. Forest owners and managers protect and reserve ecologically viable representative areas that are appropriate to the scale and intensity of the operation.

Conformance with Indicator: Yes  No  N/A

Because of the very large size and landscape diversity of the CNNF, together with a relatively low level of management activity in many areas, representative samples of natural forest communities abound.

In addition to protecting unique and sensitive areas during the implementation of management practices within suitable timber management areas, CNNF has designated special management areas (Management Area 8) and Wilderness (Management Area 5) that incorporate representative areas across the Forest. These areas are collectively described as "Ecological Reference Areas". The purpose of these areas is to protect and maintain: 1) unique ecological systems or features, 2) habitat for sensitive species, 3) high-quality examples of common ecosystems. These Areas total approximately 250,000 acres.

CNNF has designated Alternative Management Areas (AMA) where the objective is to: "...provide higher levels of ecological components while providing timber products. Key aspects of AMAs include the following: extended rotation ages, larger trees, higher levels of snags woody debris, larger patches, higher retention of reserve trees, and improved wetland transition zones. There are 262,900 acres of AMAs."

6.4.b. Where existing protected areas within the landscape are not of adequate size and configuration to serve as representative samples of commonly

Conformance with Indicator: Yes  No  N/A

It is likely that CNNF, as the largest landbase under a single management system in northern Wisconsin, contains the

<p>occurring forest types as defined above, owners or managers of mid-sized and large forests, whose properties are conducive to the establishment of such areas, designates ecologically viable areas to serve these purposes.</p> <p><i>Applicability notes to 6.4.b.: When evaluating the need for representative sample areas, the assessment should consider the relative rarity and degree of protection of similar areas at the state-wide scale, or at the biophysical region scale (as defined by state Natural Heritage programs) if Natural Heritage program or other assessments suggest that there is significant variation in community or ecosystem types between biophysical regions. Where existing protected areas adequately represent commonly occurring forest types in the landscape, these areas may suffice as the representative samples and no representative sample need be established on the forest.</i></p> <p><i>The owner or manager of a small forest may not be expected to designate representative sample(s) of commonly occurring forest types, except where there is an exceptional opportunity to contribute to an under-represented protected areas system. For small forests or low-intensity managed forests, this criterion is satisfied by meeting the standards of Criteria 6.2.</i></p> <p><i>The size and configuration of the representative areas depend on the:</i>  <i>(1) extent of representation of their forest types within the landscape (less protection calls for more representative samples);</i>  <i>(2) ecological importance of setting aside stands and tracts to other conservation efforts (a minimum size and ecological value is needed to make representative samples useful); and</i>  <i>(3) intensity of forest management within the forest and across the landscape (a less intensively managed forest or landscape calls for less area of representative samples, and a more intensively managed forest or landscape calls for more).</i></p>	<p>best potential within the landscape to provide representative examples of various forest communities. Only the Northern Highland/American Legion State Forest, the Ottawa National Forest, and potentially several County Forests would provide similar potential. The CNNF spans a large geographic area and can be seen as a “repository” of samples of natural forest types for the entire Region. The makeup of CNNF’s landscape is such that all commonly occurring forest types are well represented.</p> <p>Special Management Areas and lands withdrawn from timber management provide ample opportunity to adequately represent the natural forest types occurring in the region. Therefore, no additional representative samples need be established.</p> <p>CNNF planning documentation (e.g., FEIS, LAD report) contains discussion of the processes for determining the status and configuration of representative areas at the Forest and landscape scales. Virtually all ecosystems occurring within the area of CNNF’s lands are also represented on CNNF lands.</p>
<p>6.4.c. The size and arrangement and time scale of on-site representative sample areas are designated and justified using assessment methods and sources of up-to-</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF ecological staff are well connected with</p>

<p>date information described in 6.1.</p> <p><i>Note: Known protected off-ownership areas that are in proximity to the management unit may be used to meet the goal in the landscape.</i></p>	<p>researchers in other agencies and in academia. CNNF has inventoried ecologically significant features on the Forest from 1992 onward. CNNF evaluated ecosystems within the landscape utilizing data from sources such as the Wisconsin Natural Heritage Inventory to identify high-risk-of-loss systems. Representative areas on the Forest were ranked based on their ecological quality (which included the information in Criterion 6.1) and designated based on this ranking (see LAD report). Ecological reference areas are labeled as research natural areas, special management areas, or old growth (Management Areas 8E, 8F and 8G).</p>
<p>6.4.d. Unless exceptional circumstances can be documented, known areas of intact old-growth forests are designated as representative sample areas under purpose 3. (See Applicability Note under 6.4 above) and are reviewed for designation as High Conservation Value Forests (HCVF- see also Applicability note under 6.3). Known areas of un-entered stands of old-growth are carefully reviewed, screened for uniqueness, and considered as potential representative sample areas prior to undertaking any active management within them (see Applicability Note under 6.4). Old growth stands not designated as either a HCVF or a representative sample area are, at a minimum, managed to maintain their old-growth structure, composition, and ecological functions under purpose 3.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF conducted an extensive field-oriented survey of potential high conservation value forest areas that resulted in the designation of over 185,000 acres of designated protected areas. CNNF has designated most known areas of old-growth as special management areas (e.g., MA 5, 8E, 8F, 8G) where natural processes will be allowed to control ecological change. CNNF's definition of "old growth" is more inclusive than the definition within the Lake States Standard.</p> <p>CNNF has tentatively identified an additional 1000 acres of scattered areas in their forest inventory that may meet the definition of old growth. These areas need to be ground-truthed to determine their ability to function as representative areas or HCVF. CNNF is now in the process of evaluating these additional areas, however they have not yet determined whether the potential old growth stands outside currently protected areas are in fact old growth (i.e., by composition, structure, and functionality) and warrant protected designation (<b>CAR 5/06</b>).</p>
<p>6.4.e. The size and extent of representative samples on public lands being considered for certification is determined through a transparent planning process that not only utilizes scientifically credible analyses and expertise but is also accessible and responsive to the public.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Designation of special management areas was conducted in consultation with regional experts and incorporated public input through the NEPA process.</p>
<p>6.4.f. The process and rationale used to determine the size and extent of representative samples are explicitly described in the public summary.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The FEIS, LAD report, and other planning documentation provide information on the process used to determine the type and size of representative areas. These documents discuss the rationale and need for representative areas, as well as the location and size of the areas deemed to be representative.</p>
<p>6.4.g. Managers of large, contiguous public forests (&gt;50,000 acres) create and maintain representative protected areas within the forest area, sufficient in size to encompass the scale and pattern of expected natural disturbances while maintaining the full range of forest types</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Wind was the predominant natural disturbance mechanism on 65% of the Forest in the past. These disturbances affected 0.6% of the hardwood-hemlock forest annually as small gap-creating events and 0.07% of the hardwood-hemlock annually as larger blowdowns. CNNF's special</p>

and successional stages resulting from the natural disturbance regime.	management areas (such as five wilderness areas each with a minimum area of 4,000 acres), as well as maintaining patch sizes in Management Area 2 of several thousand acres, provide ample opportunity for natural disturbances to operate.
<p>6.4. DOD/DOE 1. Broad scale ecological processes (e.g., natural fire regimes, successional patterns, flooding) are restored when:</p> <p>1. they are not present in the landscape in a substantially unmodified condition, and</p> <p>2. the size of the forest and its primary mandated use can accommodate their restoration.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Objectives 1.4b, 1.4c, and 1.4h of the Plan address the desire to restore disturbances (primarily wind throw and fire) to the landscape in patterns that emulate those that occurred naturally in coniferous and grassland cover types. Wind throw occurs commonly on the Forest. Currently protected areas and the goal of increasing vegetative patch size will enhance the potential to incorporate broad-scale ecological processes into the forest's natural cycles.</p>
<p>6.4. DOD/DOE 2. Where existing protected areas within the landscape are not adequate in number, size, or configuration to assure the long-term viability of the existing elements of native biological diversity, the forest manager designates protected areas to enhance their viability.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Existing protected areas within the landscape are adequate in number, size, and configuration to ensure long-term viability of the existing elements of native biological diversity.</p>
<p>NOTES: <b>CAR 5/06:</b> CNNF shall develop and implement a process to confirm whether potential old growth stands outside currently protected areas are in fact old growth (i.e., by composition, structure, and functionality) and warrant protected designation.</p>	
<p><b>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 protect water resources.</b></p> <p><i>Note: The Lakes States-Central Hardwoods Regional Certification Standards cover a diverse landscape - from prairie to glaciated Northern lands to unglaciated forests in the South. Within this region, all States have developed best management practice guidelines specific to their ecological conditions (see Appendix A). These locally developed guidelines serve as the base requirement for implementation of this standard.</i></p> <p><b>Criterion Level Remarks:</b> Conformance</p>	
<ul style="list-style-type: none"> <li><b><u>Logging and Site Preparation</u></b></li> </ul> <p>Logging operations and construction of roads and skid trails are conducted only during periods of weather when soil is least susceptible to compaction, surface erosion, or sediment transport into streams and other bodies of water.</p> <p>Logging damage to regeneration and residual trees is minimized during harvest operations.</p> <p>Silvicultural techniques and logging equipment vary with slope, erosion hazard rating, and/or soil instability with the goal of minimizing soil disturbance. Areas that</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 2004 LRMP contains numerous Objectives to minimize damage to forest resources due to mechanized activity (see Chapter 1) and specifically incorporates the Wisconsin Forestry BMPs for Water Quality, the Wisconsin Construction Site BMP Handbook, and the Federal Highway Administration BMPs for Erosion and Sedimentation Control as the minimally acceptable practices used to protect the forest system. Additionally, the LRMP contains Standards and Guidelines (see Chapter 2) for protecting water resources, soils, biological resources, wildlife and fish, RT&amp;E species, RFSS, and aesthetics.</p> <p>The Region 9 Directive for Chapter 2 of the FSH 2509.18 contains detailed definitions of detrimental soil disturbance</p>

<p>exhibit an extreme risk of landslide are excluded from management activities that may precipitate landslides.</p> <p><i>Note: "Extreme risk" is a legally binding term in some states.</i></p> <p>Plans for site preparation specify the following mitigations to minimize impacts to the forest resources:</p> <ol style="list-style-type: none"> <li>(1) 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.</li> <li>(2) Top soil disturbance and scarification of soils is limited to the minimum necessary to achieve successful regeneration of desired species.</li> </ol> <ul style="list-style-type: none"> <li>• <b><u>Transportation System (including permanent and temporary haul roads, skid trails, and landings)</u></b></li> </ul> <p>The transportation system is designed, constructed, maintained, and/or reconstructed to minimize the extent of the road network and its potential cumulative adverse effects.</p> <p>Access to temporary and permanent roads is controlled to minimize significant adverse impacts to soil and biota while allowing legitimate access, as addressed by Principles 3 and 4 and identified in the management plan.</p> <p>Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.</p> <ul style="list-style-type: none"> <li>• <b>Stream and Water Quality Protection</b></li> </ul> <p>Stream crossings are located and constructed in a way that minimizes fragmentation of aquatic habitat (see Glossary) and protects water quality.</p> <ul style="list-style-type: none"> <li>• <b>Visual and Aesthetic Considerations</b></li> </ul> <p>Forest owners or managers limit and/or reduce negative impacts on visual quality</p>	<p>for rutting (6 inches deep for 10 feet), soil displacement (&gt;25% of surface area), and compaction (15% increase in bulk density), among other effects. Detrimental effects are allowed on up to 15% of the harvest area. All CNNF staff interviewed stated that 15% of the area was too large to accept detrimental impacts and that they would modify harvest operations well before this threshold was reached. Based on field observations, this is common practice. Across the Forest, there were no observations of excessive soil disturbance.</p> <p>CNNF harvest operations are limited to dry or frozen ground. Numerous instances were observed where frozen ground conditions were required in the harvest plan for protecting mineral soils susceptible to compaction.</p> <p>Damage to regeneration and residual trees is consistently minimized in practice, based on field observations. Sale contracts require that purchaser shall not unnecessarily damage young growth or other trees to be reserved (Provision BT6.32), that no damage of any form occur to reserve trees (Provision CT6.32), that felling minimize damage to residual trees (Provision CT6.41). However, there are no written criteria for evaluating acceptable levels of tree damage with regard to wound size and frequency (<b>OBS 6/06</b>).</p> <p>CNNF depends solely on restrictions to frozen ground to protect soils, rather than specifying alternative logging equipment. There is a limited range of equipment available across the Forest, ranging from wheeled/tracked processors and forwarders to the occasional cable skidder. Thus, there is a limited ability to select from alternative equipment. However, the use of seasonal restrictions, buffer areas, and the Region 9 Directives effectively controls soil disturbance.</p> <p>Site preparation for natural regeneration or planting is conducted using salmon blades, roller chopping, or disc trenching. All of which limit soil disturbance to the minimum amount necessary for successful regeneration.</p> <p>The transportation system is designed using BMPs to minimize adverse impacts. No instances of excessive erosion were observed during field visits. It is a Goal to reduce Forestwide average total road density to no more than 3.0 miles per square mile within timber management areas. CNNF staff estimate that 4-5 miles of new road construction occurs across the Forest each year, while 40-45 miles of road are decommissioned (obliterated) each year. Appendix BB in the LRMP contains guidelines for reducing road density within each Management Area. CNNF uses gating and seasonal closures to restrict motorized access to sensitive areas.</p>
--	--

<p>caused by forest management operations.</p>	<p>While poorly functioning riparian crossing still exist on the Forest, CNNF has an active program to repair crossings that are causing erosion or fish passage problems. Several such sites were reviewed in the field and found to be well in conformance with the Standard.</p> <p>Numerous guidelines and standards are found in the LRMP for scenery management (pp. 2-29 to 2-33). Field observations verified that scenery management objectives were incorporated into management activities.</p>
<p><b>AC 6.5.1.</b> Where federal, state, county and local BMP guidelines, recommendations, and regulations provide several options, the most effective measure for protecting the affected resource is applied.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Field observations verified that BMPs were applied appropriately, and typically were exceeded in practice.</p>
<p>NOTES: <b>OBS 6/06:</b> (See Criterion 5.3)</p>	
<p><b>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.</b></p> <p><i>Applicability Note to Criterion 6.6: This Criterion is guided by FSC Policy Paper and Guidelines: Chemical Pesticides in Certified Forests: Interpretation of the FSC Principles and Criteria. Revised July 2002. In addition, 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.</i></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>6.6.a. Forest owners and managers demonstrate compliance with FSC Policy paper: "Chemical Pesticides in Certified Forests, Interpretation of the FSC Principles and Criteria, July 2002" (available at <a href="http://www.fsc.org/en/whats_new/documents/Docs_cent/2">http://www.fsc.org/en/whats_new/documents/Docs_cent/2</a>) and comply with prohibitions and/or restrictions on 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.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Since 1990, there has been a moratorium on the use of chemical pesticides for timber management (i.e., site preparation) on CNNF. In 2003, the Forest Supervisor approved the use of pesticides to manage NNIS populations and in 2005 the Chequamegon-Nicolet Invasive Plant Control EA was developed. This EA covered the use of glyphosate, triclopyr, imazapyr, and clopyralid. To date, all chemical treatments for NNIS control have been done using primarily glyphosate, with some triclopyr and clopyralid. While CNNF is not specifically aware of the FSC Policy paper regarding chemical pesticides, CNNF is not utilizing any chemicals that are currently prohibited by that policy (<b>OBS 12/06</b>).</p>
<p>6.6.b. Forest owners or managers employ silvicultural systems, integrated pest management, and strategies for controlling vegetation that minimize negative</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>One of the guidelines in the LRMP under forest health is to "Give preference to mixtures of species and age classes</p>

<p>environmental effects. Non-chemical techniques are preferred in the implementation of these strategies.</p>	<p>over monocultures and large areas of a single age class.” Silvicultural prescriptions are used to maintain tree and stand vigor by removing less vigorous trees and managing for stand-level and forest-wide structural diversity. Field observations verified that these goals were being addressed.</p> <p>CNNF restricts herbicide use to controlling non-native invasive species (NNIS), where 83% of the applications used glyphosate. CNNF will initiate control practices “wherever” NNIS are discovered. Herbicides are not used in other aspects of forest management or in utility corridor maintenance by CNNF policy. Mowing and prescribed burning have been used to control interfering woody vegetation.</p> <p>CNNF instituted firewood cutting/transportation bans in certain areas of the Forest to control insect (e.g., emerald ash borer) and disease (e.g., oak wilt) pests. CNNF requires equipment to be power washed prior to being used in other areas of the Forest whenever the equipment has been used in known NNIS infestations.</p>
<p>6.6.c. Forest owners or managers develop written strategies for the control of pests as a component of the management plan (see Criterion 7.1).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Control practices for competing vegetation are described in project-level analyses or stand prescriptions. The 2005 Invasive Plant Control EA contains control strategies for non-native invasive plant species. The LRMP has a long-term strategy for reducing the deer herd size (and related adverse herbivory) by reducing suitable habitat over time through the development of more area of northern hardwood interior forest cover type. Strategies for the control of gypsy moth are found in the “Gypsy Moth Management in the United States Final Environmental Impact Statement” (November 1995). CNNF has strategies for addressing oak wilt and emerald ash borer. Future pests, such as beech bark disease have been recognized as potential threats.</p>
<p>6.6.d. If chemicals are applied, the most environmentally safe and efficacious chemicals are used. Chemicals are narrowly targeted, and minimize effects on non-target species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Chemicals used for NNIS control are effective while having high environmental safety. Cut stump or spot spray applications are used to minimize effects to non-target species.</p>
<p>6.6.e. Chemicals are used only where they pose no threat to supplies of domestic water, aquatic habitats, or Rare species or plant community types.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Controls are implemented in the Invasive Plant Control EA to protect aquatic habitats, water supplies, and RT&amp;E species and plant communities.</p>
<p>6.6.f. If chemicals are used, a written prescription is prepared that describes the risks and benefits of their use and the precautions that workers will employ.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The Invasive Plant Control EA, site-level documentation, and Job Hazard Analysis documents contain prescriptive narrative that is in conformance with the Indicator.</p>

<p>6.6.g. If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF maintains records on pest occurrences and control measures. The Forest Service Pesticide-Use Management and Coordination Handbook (FSH2109.14) documents the procedures for unintended pesticide exposure from spills, incidents and accidents. Chapter 60 of this Handbook describes an incident as “Pesticide incidents include non-life-threatening situations such as minor pesticide spills, non-target pesticide applications ... and any other situation that may affect public welfare or may be of special interest to the public, the press, or other media.” Documentation of such incidents is reported through the Pesticide Accident and Incident Report (FS-2100-D). CNNF monitors treatments sites to evaluate the need for additional treatment as discussed in the Invasive Plant Control EA.</p>
<p>NOTES: <b>OBS 12/06:</b> CCNF could review the FSC policy paper on chemical use to ensure that unintended non-conformance with that policy does not occur.</p>	
<p><b>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.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>6.7.a. In the event of a spill of hazardous material, forest owners or managers immediately contain the material, report the spill as required by applicable regulations, and engage qualified personnel to perform the appropriate removal and remediation.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF has developed a DRAFT Emergency Preparedness Action Plan (which is not yet official policy (<b>OBS 13/06</b>), which addresses hazardous materials spills and the dumping of hazardous material on CNNF lands by other persons. Wisconsin and Environmental Protection Agency reportable spill quantities are listed within this document, as are containment and remediation actions. Timber sale contracts require reporting and containing spills (Provision BT6.341). CNNF provided three examples of spill reporting and remediation that have occurred since 2001. All were remediated under the oversight of the CNNF, Wisconsin Department of Natural Resources Spill Coordinator, and a professional disposal contractor (WRR Environmental Services).</p>
<p>6.7.b. Waste lubricants, anti-freeze, containers, and related trash are stored in a leakproof container until they are transported to an approved off-site disposal site.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Specifications for containing and transporting this material are within the DRAFT Emergency Preparedness Action Plan and timber sale contracts (Provision BT6.34). Harvest sites were clean.</p>
<p>6.7.c. Broken or leaking equipment and parts are repaired or removed from the forest.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Timber sale contract Provision BT6.34 requires equipment to be maintained in good repair and that any servicing will not pollute soil or water. Field observations confirmed that this Provision was enforced.</p>
<p>6.7.d. Equipment is parked away from riparian management zones, sinkholes, or supplies of ground water.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Timber sale contract Provision BT6.34 requires that any</p>

	servicing will not pollute soil or water. Field observations confirmed that this Provision was enforced.
NOTES: <b>OBS 13/06:</b> CNNF could expedite the approval of their DRAFT Emergency Preparedness Action Plan to ensure that all parties adhere to it as official policy.	
<p><b>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.</b></p> <p><i>Applicability Note to Criterion 6.8: Genetically improved organisms (e.g., Mendelian crossed) are not considered to be genetically modified organisms (i.e., results of genetic engineering), and may be used. The prohibition of genetically modified organisms applies to all organisms including trees. This Criterion is guided by the FSC policy paper: GMOs: Genetically Modified Organisms: Interpretation for FSC. Revised October 1999.</i></p>	
<b>Criterion Level Remarks:</b> Conformance	
<p>6.8.a. Exotic (i.e., non-indigenous), non-invasive predators or biological control agents are used only as part of a pest management strategy for the control of exotic species of plants, pathogens (see Glossary), insects, or other animals when other pest control methods are, or can reasonably be expected to prove, ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for indigenous species because, for example, exotic species can host pathogens that might diminish biodiversity in the forest.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF has employed exotic, non-invasive predators, or biological control agents only as part of a pest management strategy for control of non-native invasive species (NNIS) when alternative control methods (manual or chemical) have proven ineffective or would imperil other resources. Of 1,800 NNIS sites currently identified on the CNNF, biological control agents have recently been used at only two sites. These agents include introduction of <i>Galerucella</i> spp. beetles that feed preferentially on purple loosestrife, and leafy spurge flea beetles (<i>Aphthona</i> spp.) to control leafy spurge. CNNF determined that neither mechanical nor chemical control was expected to be effective or appropriate at these sites. The purple loosestrife site is along a river, large enough to support bio-control insects where mechanical control would be difficult and chemical use undesirable. At the other site, manual and chemical control could result in accidental damage to the rare Missouri rock-creep where it occurs mingled with the leafy spurge.</p> <p>Use is contingent on peer-reviewed, scientific evidence. In conjunction with the EA for the CNNF's Non-native Invasive Plant Project, staff extensively reviewed existing scientific literature and results of previous control efforts using these species across the region (WI, MN, MI). Repeated studies have shown only minor damage to non-target native plants. <i>Galerucella</i> spp. <i>Aphthona</i> spp have been extensively used and monitored by WDNR and other landowners in Wisconsin for over 12 years. <i>Galerucella</i> spp. were first released on CNNF in 1997 with excellent results, and subsequent monitoring did not indicate adverse impacts on non-target plant species (CNNF Purple Loosestrife Monitoring Project, 1997-2004).</p> <p>CNNF is currently using pheromone flakes to control invasive gypsy moths, although <i>Bacillus thuringiensis kurstaki</i> (Btk) and Gypchek pesticides have been used in the past. Gypchek has been used where application of Btk poses a risk to certain lepidopterous species within the</p>

	<p>affected area. The safety and effectiveness of these treatments has been substantiated by the scientific literature.</p> <p>CNNF staff extensively document and monitor the use of exotic non-invasive predators and biological control agents and strictly follow all applicable laws, regulations, and scientific protocols. These bio-control insects have been approved by APHIS, and CNNF follows scientific protocols and complies with applicable federal and state laws governing their use. Also, proposed use of bio-control agents is subjected to public review and comment.</p>
<p>NOTES: None</p>	
<p><b>6.9 The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>6.9.a. Except on plantation sites (see also Criterion 10.4), the use of exotic tree species is permitted only in the first successional stages or other short-term stages for the purposes of restoring degraded ecosystems.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Management activities proposed and implemented by CNNF under the Forest Plan are conducted in a manner which ensures regeneration and succession of native tree species and forest communities, using natural regeneration and locally-adapted seedlings in the case of artificial regeneration. CNNF does not regenerate or plant exotic tree species. Norway spruce and Scot's pine were occasionally used in the early 1900s to reforest areas. There is one 32-acre planting of Norway spruce and 22 plantings (499 acres) where Norway spruce or Scot's pine are mixed with native species. It is CNNF policy to allow these areas to convert naturally or through planting to native species.</p>
<p>6.9.b. The use of exotic species (see Glossary) is contingent on peer-reviewed scientific evidence that the species in question is non-invasive and will not diminish biodiversity. If non-invasive exotic species are used, the provenance and location of use are documented, and their ecological effects are actively monitored.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF uses both native and non-native seed mixes to control erosion and other soil disturbances during management activities. When completely native seed mixes are unavailable, CNNF uses mixtures of native and non-persistent, non-native mixes of grasses (e.g., oats, rye) and legumes for seeding roadsides, landings, and skid trails. Based on the literature and expert opinion, these exotic species are considered non-invasive. For example, the Crooked Oak Salvage Plan within the Washburn District called for the following grass mixture to prevent erosion: an oat nurse crop plus native Canada wild-rye, Virginia wild-rye, and little bluestem, with a certified weed free mulch such as oat straw to be used for mulching. Sites where exotic species are used are documented.</p> <p>According to the CNNF Forest Ecologist, the CNNF is moving towards using only native seed mixes for erosion control. To this end, the CNNF began a native plant propagation program in 2005 to develop internal and external sources of native seed for use on roadsides,</p>

	landings, skid trails, and other erosion-prone sites. The intent of this program is to completely eliminate use of non-native seeding mixtures on erosion-prone sites and more generally to prevent further spread of NNIS.
6.9.c. Written documentation is maintained for the use of exotic species.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Use of biological control agents, including locations and times of application, as well as post-application monitoring, are carefully documented. CNNF also maintains written documentation and provides detailed instructions to contractors for species mixes, rates, locations, and timing of seeding applications within sale contract provisions (e.g., Valhalla View Sale Area Contract, pg. 154) to control erosion on landings, roadsides, and other areas disturbed by management activities.</p>
6.9.d. Forest owners or managers develop and implement control measures for invasive exotic species.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF LRMP includes NNIS control and eradication in Goals and Objectives as well as Forest-wide Standards and Guidelines and Monitoring for NNIS. CNNF has developed an aggressive NNIS control program as described in the NNIS EA. CNNF has developed an Early Detection/Rapid Response program to monitor NNIS. All developed recreation sites are surveyed each year. All gravel pits and homesteads have been surveyed. Most roads and motorized trails have been surveyed at least once. Most of the largest lakes have been surveyed for aquatic invasive plants.</p> <p>CNNF uses accepted mechanical, chemical, and biological control methods to control NNIS. CE's and EA's have been completed for the use of each of these treatments, including guidelines to appropriately match the type of control method with site-specific conditions. In addition to efforts by full-time CNNF staff, seasonal employees are hired each summer to work exclusively on invasive plant inventory and control. CNNF has developed an NNIS list for the Forest. Of 29 NNIS listed, 19 species are on the "A List" (species of immediate concern; control is warranted) and 10 species are on the "B List" (not currently invading natural habitats). To date, 1,800 sites on CNNF covering approximately 1,526 acres of infestation on 5,938 gross acres have been identified, with control measures implemented on a subset of these sites (ranked according to priority/immediacy of concern). When NNIS are found on adjacent lands, CNNF staff attempt to work with these landowners to more effectively control the spread of NNIS. NNIS control efforts are monitored for implementation and effectiveness. When CNNF uses contractors to control NNIS, contractors are monitored by CNNF staff. CNNF timber sale contracts include equipment cleaning clauses requiring operators to ensure that prior to moving into or out of sale areas where potential transfer of NNIS is a concern, all equipment is free of soil, vegetative matter, seeds, or</p>

	<p>other debris that could transport exotic seeds. However, equipment cleaning clauses currently are limited to management activities within timber sale areas (<b>OBS 14/06</b>). CNNF also has integrated NNIS into project planning, NEPA, and KV plans. All new EISs include an NNIS specialist report and design features to address NNIS.</p> <p>CNNF has been proactive in developing partnerships and educational resources to prevent spread of NNIS. CNNF has been actively involved in establishing several partnerships to control NNIS, including the Northwoods Weed Initiative, Invasive Plant Association of Wisconsin (IPAW), and the Governor's Council on Invasive Species. CNNF hosted a Cooperative Weed Management Area (CWMA) workshop in 2005, and has helped organize similar conferences. A CWMA MOU in the Northwest counties of the State is nearing completion. CNNF is involved in the development of state-level BMP's for NNIS through the WI Council on Forestry. The CNNF also developed an invasive species website and has assisted with the development of field guides, posters, and brochures to educate adjacent landowners and the general public about NNIS.</p> <p>The audit team visited several NNIS infestation sites, including sites (e.g., Franklin-Butternut Lake trailhead – garlic mustard site; Clam Lake Snowmobile Re-route – spotted knapweed) where control methods have been implemented and monitored for effectiveness. All known NNIS sites have been reported in the FACTS and NRIS TERRA invasive plants databases.</p>
<p><b>AC 6.9.1.</b> Managers of National Forests identify activities by which invasive exotic species (e.g. plants, insects, animals) become established. Control mechanisms, including preventative strategies, are implemented for high risk activities associated with Forest Service management responsibilities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF staff have identified areas with high risk activities (e.g., vehicular traffic areas, homesteads, disturbed sites) conducive to spread of NNIS and regularly monitor them. Appropriate control mechanisms are employed when NNIS are found (also see findings for Criterion 6.9.d).</p>
<p>NOTES: <b>OBS 14/06:</b> CNNF could consider requiring preventative measures (e.g. equipment cleaning clauses) to all management activities that could potentially spread NNIS.</p>	
<p><b>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</b></p> <p><b>a) Entails a very limited portion of the forest management unit; and</b>  <b>b) Does not occur on high conservation value forest areas; and</b>  <b>c) Will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit.</b></p> <p><i>Applicability Note: Forest management activities that are part of an approved management plan, including road construction and habitat restoration (such as creation of openings in the forest for wildlife habitat and the maintenance or creation of wetlands or prairies) are not conversions for the purposes of this criterion.</i></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>6.10.a. Over the life of the ownership, forest to non-forest conversions are limited to the threshold of 1% of the forest area or</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>It is CNNF's goal to maintain the land base in a forested</p>

<p>100 acres, whichever is smaller, except that a parcel up to two acres in size may be converted for residential use by the forest owner or manager.</p>	<p>condition, as defined by the Applicability Note to this Criterion. There are 180 active or inactive gravel pits across the Forest, which average 6 acres or less in size. Surface mineral development is the only anticipated development that could convert forestland to a non-forested condition.</p> <p>There is the potential for non-forest conversion in those areas where the subsurface rights are not owned by the federal government. Exploration activity has had a minor impact on surface resources, thus requiring minimal surface restoration needs. Most prospecting activity was done seasonally (winter) to avoid surface impacts from accessing sites and to keep road access costs to a minimum. Prospecting activity utilized an already existing extensive CNNF road network, therefore, there was very little additional road access needed. There have been 10's of thousands of acres of the CNNF under permit for non-common variety exploration activity. But because this activity has had minimal surface impact and limited visibility to the public on the ground, it has not generated much interest. The only significant public interest was generated in the early 1990's when a mineral deposit was discovered and the company started proposing a mine development, but the mine proposal never progressed to the permitting stage. The extent to which the CNNF could control subsurface mining must be monitored over time. At the time of the test evaluation, mineral development was expected to be very small and forest conversion was not occurring.</p>
<p>6.10.b. When private forestlands are sold, a portion of the proceeds of the sale is reinvested in additional forest lands and/or forest stewardship.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>CNNF lands are public lands.</p>
<p>NOTES: None</p>	

**PRINCIPLE 7. MANAGEMENT PLAN - 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.**

<u>Criteria and Indicators</u>	<u>Findings</u>
<p><b>7.1. The management plan and supporting documents shall provide:</b></p> <ul style="list-style-type: none"> <li>a) Management objectives.</li> <li>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.</li> <li>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</li> <li>d) Rationale for rate of annual harvest and species selection.</li> <li>e) Provisions for monitoring of forest growth and dynamics.</li> <li>f) Environmental safeguards based on environmental assessments.</li> <li>g) Plans for the identification and protection of rare, threatened and endangered species.</li> <li>h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</li> <li>i) Description and justification of harvesting techniques and equipment to be used.</li> </ul>	
<p><i>Applicability Note: The management plan may consist of a variety of documents not necessarily unified into a single planning document but which represents an integrated strategy for managing the forest within</i></p>	

*the ecological, economic, and social limitations of the land. The plan includes a description and rationale for management elements appropriate to the scale, intensity, and goals of management, and may include:*

- Silvicultural systems*
  - Regeneration strategies*
  - Maintenance of structural and species diversity*
- Pest control (disease, insects, invasive species, and vegetation)*
  - Soil and water conservation*
  - Methods and annual rates of harvest, by species and products*
  - Equipment and personnel needs*
- Transportation system*
- Fire management*
  - Prescribed fires*
  - Wildfires*
- Fish and wildlife and their habitats (including non-game species)*
- Non-timber forest products*
  - Methods and annual rates of harvest, by species and products*
  - Regeneration strategies*
- Socioeconomic issues*
- Public access and use*
- Conservation of historical and cultural resources*
  - Protection of aesthetic values*
  - Employee and contractor policies and procedures*
  - Community relations*
  - Stakeholder notification*
  - Public comment process*
  - For public forests, legal and historic mandates*
- American Indian issues*
  - Protection of legal and customary rights*
  - Procedures for integrating tribal concerns in forest management*
  - Management of sites of special significance*
- Special management areas*
  - High Conservation Value Forests*
  - Riparian management zone*
  - Set asides of samples of representative existing ecosystems*
  - Sensitive, rare, threatened, and endangered species protection*
  - Other protected areas*
- Landscape level analyses and strategies*

**Criterion Level Remarks:** Minor non-conformance.

**7.1.a. Management objectives**

<p>7.1.a.1. A written management plan is prepared that includes the landowner's short-term and long-term goals and objectives (ecological, social, and economic). The objectives are specific, achievable, and measurable.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF planning documents contain three overall Goals that the Forest will strive to achieve over time and 60 Objectives that are expected to be met within the timeframe of the LRMP. These Objectives are specific and measurable. Planning documents include both strategic (the LRMP) and tactical (project-level analyses).</p>
<p>7.1.a.2. The management plan describes desired future conditions that will meet the long-term goals and objectives and that determine the silvicultural system(s) and management activities to be used.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>For lands suited for timber management, the FEIS describes the 100-year forest composition and structure for each Management Area, as well as the silvicultural treatments and harvest rates necessary to meet these goals, including</p>

	Forest landscape pattern, visual quality, and riparian area goals and objectives.
7.1.a DOD/DOE 1. Regional and/or site-specific plans for conservation, protection, and restoration, proposed by agencies, scientists, and/or stakeholders, are addressed during forest management planning.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF consulted extensively with “Native American Tribes, other federal agencies, State and local government, individuals, and organizations...” to identify issues and collect information on designing the alternatives considered in the DEIS. Ten informational open houses and five public hearings were held when the DEIS was released. CNNF collected 3,000 unique responses on the draft documents. Appendix A of the FEIA details the public involvement in LRMP development.</p> <p>As examples, among others, CNNF incorporated the following external plans into their planning process:</p> <ul style="list-style-type: none"> <li>▪ USFWS. 1983. Northern States Bald Eagle Recovery Plan</li> <li>▪ WDNR. 1999. Wisconsin Wolf Management Plan</li> <li>▪ USFWS. 1992 (revision). Recovery Plan for the Eastern Timber Wolf</li> <li>▪ USFWS. 1991. Fassett's Locoweed Recovery Plan</li> <li>▪ WDNR Forestry BMPs for Water Quality</li> <li>▪ USFS. 1996. Gypsy Moth Management in the United States</li> <li>▪ WDNR. 2000. Management Plan and Environmental Assessment for the Clam Lake Elk Herd.</li> <li>▪ WDNR. 1986. Pine Marten Recovery Plan.</li> <li>▪ WDNR. Statewide Comprehensive Outdoor Recreation Plan</li> <li>▪ WDNR. Northern Initiatives – A Strategic Plan for the Next Decade</li> <li>▪ WDNR: Deer Population Goals and Harvest Management</li> </ul>
<b>AC 7.1.a.1.</b> Provisions for outdoor recreation are integrated with other uses and appropriately incorporated into management objectives and planning documents.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The LRMP contains 12 Objectives specifically addressing the CNNF goal of “Maintain[ing] or enhanc[ing] the diversity and quality of recreation experiences within acceptable limits of change to ecosystem stability and condition.” Access and recreation opportunities are analyzed within the FEIS.</p>
<b>7.1.b. Description of forest resources to be managed, environmental limitations, land use and ownership status, socioeconomic conditions, and profile of adjacent land</b>	
7.1.b.1. The management plan describes the timber, fish and wildlife, harvested non-timber forest products, soils, and non-economic forest resources.	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The FEIS and LRMP describe the timber, fish, and wildlife resources, as well as the non-timber forest products, soils, and recreational/aesthetic resources of the Forest. Fish are addressed more generally, with more emphasis on describing appropriate habitat. RT&amp;E and RFSS wildlife and plant species are well described, with other species more generally described. The FEIS discusses the direct, indirect,</p>

	<p>and cumulative effects of the Selected Alternative on these resources and their habitats. However, there is no discussion of the mineral resources on the Forest. Additionally, CNNF could not produce records to identify the ownership status of subsurface rights throughout the forest. Although the status of subsurface rights is presumably a matter of public record and is available through county courthouse records, CNNF does not maintain a current summary of the subsurface rights ownership on the Forest. Consequently, it is not clear where subsurface rights are held by the public, where they are held by private entities and how these ownerships may effect the management of the forest (<b>CAR 6/06</b>).</p>
<p>7.1.b.2. The management plan includes descriptions of special management areas; sensitive, rare, threatened, and endangered species and their habitats; and other ecologically sensitive features in the forest.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Chapter 3 and Appendices J and N of the FEIS, and pages 2-18 to 2-24 of the LRMP, describe special management areas; sensitive, rare, threatened, and endangered species and their habitats; and other ecologically sensitive features.</p>
<p>7.1.b.3. The management plan includes a description of past land uses and incorporates this information into the vision, goals, and objectives.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The FEIS includes past land uses and natural disturbances for aquatic and terrestrial ecosystem components under the heading "Comparison of Current Conditions to Estimates of Natural Variability". This information is incorporated into current management analyses and influences numerous objectives such as increasing patch size, reducing the area of aspen cover type, and stream channel management, among many others.</p>
<p>7.1.b.4. The management plan identifies the legal status of the forest and its resources (e.g., ownership, usufruct rights (see Glossary), treaty rights, easements, deed restrictions, and leasing arrangements).</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The LRMP thoroughly describes the status of most of the legal aspects of the Forest and customary use rights associated with the forest. It also clearly describes the treaty rights, easements, and special permits that are part of the Forest's legal status. However, there is no mention of the mineral resources and subsurface mineral rights that are held by entities other than CNNF (<b>CAR 6/06</b>)</p>
<p>7.1.b.5. The management plan identifies relevant cultural and socioeconomic issues (e.g., traditional and customary rights of use, access, recreational uses, and employment), conditions (e.g., composition of the workforce, stability of employment, and changes in forest ownership and tenure), and areas of special significance (e.g., ceremonial and archeological sites).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The FEIS identifies Native American rights and uses, recreational uses, regional employment patterns, population characteristics, development pressures, land ownership patterns, socioeconomic concerns of local residents, and special management areas. The LRMP provides Standards and Goals for CNNF land purchases or exchanges.</p>
<p>7.1.b.6. The management plan incorporates landscape-level considerations within the ownership and among adjacent and nearby lands, including major bodies of water, critical habitats, and riparian corridors shared with</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The LRMP incorporates landscape-level considerations within the Forest to meet such goals as increased vegetative patch size and increased late-successional interior forest. Consideration of the effects of adjacent land</p>

<p>adjacent ownerships.</p>	<p>condition and management is often conducted at a broad, regional level due to the difficulty of obtaining localized data. Cumulative effects that consider adjacent lands are provided for: vegetation composition, structure, and function; landscape patterns; wildlife populations and habitats; species of viability concern. CNNF has incorporated various regional plans for maintaining habitats and connectivity for wildlife species (see Indicator 7.1.a DOD/DOE 1 findings).</p> <p>CNNF continues to refine their ability to incorporate more localized information from adjacent properties. Forest cover type data is now available through photo interpretation. CNNF makes the assumptions that all of these lands are all managed for timber and in a manner similar to how CNNF manages their lands, in order to provide “maximum effect” conditions when conducting biological evaluations. CNNF is in the process of developing accurate forest data for the five-mile area around all CNNF parcels.</p>
<p><b>7.1.c. Description of silvicultural and/or other management system</b></p>	
<p>7.1.c.1. Silvicultural system(s) and prescriptions are based on the integration of ecological and economic characteristics (e.g., successional processes, soil characteristics, existing species composition and structures, desired future conditions, and market conditions). (see also sub-Criterion 6.3.a)</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Silvicultural systems used by CNNF are appropriate to move the current forest condition to the desired future condition and are based on assessments of site quality (i.e., vegetative habitat type) and successional processes (typically relying on available natural regeneration). They are consistent with those accepted within the region. Vegetation management guidelines (specifying such things as stocking levels, opening sizes, age class distributions, among others) for each forest cover type are provided in the LRMP. Appendix F of the FEIS provides detailed descriptions of the silvicultural systems used in each forest cover type. Stand-level silvicultural prescriptions are developed for each stand subject to management. The current CNNF silvicultural prescription format (developed in early 2006) is an improvement over the prescriptions that were completed for earlier projects. The new format provides consistency across the Forest and, importantly, provides a detailed schedule by year of the future management activities that should occur in the stand to meet stand objectives. All prescriptions written for sites visited during the test evaluation (with prescriptions developed over the past five years) provided clear direction on the silvicultural treatment to be applied. Areas in need of silvicultural treatment are prepared for harvest as long as they meet minimally commercial volumes.</p>
<p>7.1.c.2. Prescriptions are prepared prior to harvesting, site preparation, pest control, burning, and planting and are available to people who implement the prescriptions.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF develops written prescriptions for all activities described in the Indicator. These prescriptions contain sufficient detail to clearly inform those implementing the prescription of the prescription requirements. Silvicultural prescriptions include: stand description and summary stand</p>

	<p>data, objectives, marking guidelines, mitigation measures, and operating restrictions. Pest control prescriptions (in EA or contract) provide detail on such things as method of control, chemical application rates, and safety procedures. Burn plans include treatment objectives, complexity elements, and ignition/holding/mop up instructions, among other items. Prescriptions are provided to field staff and details are reviewed with marking crews, burn crews, etc., prior to implementation. Additionally, timber sale purchasers are advised by CNNF staff of pertinent contract provisions (such as reserve areas, tree marking schemes, slash disposal, etc.) that will be required to implement the prescription.</p>
<p><b>7.1.d. Rationale for the rate of annual harvest and species selection (see criterion 5.6)</b></p>	
<p>7.1.d.1. Calculations for the harvests of both timber and non-timber products are detailed or referenced in the management plan and are based on net growth, yield, stocking, and regeneration data. (see also 5.6.b)</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The methodology and rationale for calculating timber harvest levels are thoroughly described in planning documentation (see pages B35-B48 of Appendix B of the FEIS). See also Indicator 5.6.a findings. While permits for non-timber forest product harvesting contain individual limits on the amounts collected, appropriate total annual harvest levels for non-timber forest products (such as boughs, <i>Lycopodium</i>, moss) are not addressed. Objective 2.5 of the LRMP requires CNNF to ensure that harvest levels for these products are "sustainable". CNNF has not documented these levels (<b>CAR 3/06</b>).</p>
<p>7.1.d.2. Species selection meets the social and economic goals and objectives of the forest owner or manager and leads to the desired future conditions while maintaining or improving the ecological composition, structures, and functions of the forest.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF relies on native species, targeting them to appropriate vegetative habitat types, to move the forest toward the desired future forest condition described in the LRMP. Where tree species are suited to the site, they will meet the economic needs of the forest owner. CNNF works toward improving the ecological structure of the Forest by increasing the presence of species such as white pine through planting and retaining species such as eastern hemlock in management areas.</p>
<p>7.1.d.3. The management plan addresses potentially disruptive effects of pests, storms, droughts, and fires as they relate to allowable cut.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF has completed a historical analysis of the frequency and patterns of natural disturbances. There is no formal discussion within CNNF's planning documents regarding the effects of disruptions in the forest on the ASQ. These disruptions could be either catastrophic changes (such as wide-scale blow down) or subtle changes (such as reductions in growth rates due to insect or disease outbreaks). However, given the large size of the CNNF land base, it would likely take a substantial disruption to result in a change to the current ASQ. While ASQ is revised every 10-15 years as part of the Forest planning process, there is also an amendment process that can be implemented prior to plan revision if conditions would warrant. CNNF proposed that since current harvest levels are so far below current</p>

	ASQ, there would be little need for amending ASQ for all but the most extreme situations.
<b>7.1.e. Provisions for monitoring forest growth and dynamics (see also Principle 8)</b>	
7.1.e.1. The management plan includes a description of procedures to monitor the forest.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Chapter 4 of the Plan describes monitoring and evaluation protocols. Table 4-1 defines minimum legally required monitoring. Tables 4.2 a-c provide monitoring questions by Forest Objective. Frequency of monitoring/evaluation and the required level of precision are quantified for all actions and questions.</p>
<b>7.1.f. Environmental safeguards based on environmental assessments (see also Criterion 6.1.)</b>	
	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Environmental safeguards are extensively documented in numerous documents and thoroughly based on environmental assessments (see findings associated with Criterion 6.1).</p>
<b>7.1.g. Plans for the identification and protection of rare, threatened, and endangered species. (see also Criterion 6.3.)</b>	
	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Plans for the identification and protection of RT&amp;E species, RFSS, and other sensitive species and communities are well detailed in various planning documents (see findings associated with Criterion 6.2).</p>
<b>7.1.h. Maps describing the forest resource base including protected areas, planned management activities, and land ownership.</b>	
7.1.h.1. The management plan includes maps of such forest characteristics as: relevant landscape-level factors; property boundaries; roads; areas of timber production; forest types by age class; topography; soils; riparian zones; springs and wetlands; archaeological sites; areas of cultural and customary use; locations of sensitive, rare, threatened, and/or endangered species and their habitats; and designated High Conservation Value Forests.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Planning documentation includes maps displaying: the relationship of CNNF lands to the surrounding regional landscape, property boundaries, roads, Management Areas, forest cover types, soils and topography, aquatic features, wetlands, cultural resources, sensitive species locations and habitats, and HCVF areas.</p> <p>Timber sale maps show sale and purchase unit boundaries, property boundaries, private lands, roads, no cut and Reserve Areas, slash disposal zones, streams and rivers, and treatment codes. Cover types adjacent to sale units are not typically shown, nor are embedded wetland areas consistently labeled on maps. There is a fair degree of variability in map quality and information content across the Districts (<b>OBS 15/06</b>).</p> <p>CNNF maintains a centralized GIS for the entire Forest. CNNF has recently added staff to their GIS program to address needs identified by CNNF. There are concerns regarding the timeliness and consistency of updating spatial maps across the Forest, since each District is currently responsible for providing data to the GIS staff for updating District-level maps. The GIS staff has developed a "GIS</p>

	<p>Program Action Plan (April 18, 2006) that developed protocols for addressing data management and analysis, GIS staff interactions with Districts (e.g., for consistent updating), and transferring GIS knowledge, among other issues. These protocols would improve the Forest-wide mapping and analysis process. However, no timeline for implementation of these protocols has been established (<b>OBS 15/06</b>).</p>
<p><b>7.1.i. Description and justification of harvesting techniques and equipment to be used. (see also Criterion 6.5)</b></p>	
<p>7.1.i.1. Harvesting machinery and techniques are discussed in the management or harvest plan and are specifically matched to forest conditions in order to minimize damage.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>A relatively small variety of harvesting machinery is available across the region, consisting of processors and forwarders, or a small number of cable skidders. R9-Optional Provision CT6.42 of the harvest contract is used to specify harvesting machine characteristics (e.g., width) that promote achieving management objectives. The LRMP and Forest Service Handbook 2509.18 Chapter 2 describe criteria to assess soil damage and minimize detrimental impacts. CNNF relies on prescribing acceptable levels of soil damage and seasonal restrictions to avoid soil impacts. While acceptable levels of damage are not defined for resources other than soils (see <b>OBS 6/06</b>), residual stand damage was low at all sites visited.</p>
<p>7.1.i.2. Conditions for each timber sale are established by a timber sale contract or written harvest prescription and accompanying timber sale map.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF timber sale contracts and maps provide thorough descriptions of harvesting requirements and the responsibilities of the purchaser.</p>
<p>NOTES: <b>CAR 3/06:</b> (see Criterion 5.2)  <b>CAR 6/06:</b> CNNF shall clearly describe in its planning documents the mineral resources on the Forest, the status and location of the subsurface rights owned by entities other than CNNF, and the effects of this ownership on the Forest resource.  <b>OBS 15/06:</b> CNNF could develop and implement protocols to establish a consistent mapping template for use on all Districts that identifies all pertinent information.. CNNF could establish a timeline for implementing various components of the GIS Action Plan to ensure that these improvements to the program are completed in a timely manner.</p>	
<p><b>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.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>7.2.a. Operational components of the management plan are reviewed and revised as necessary or at least every 5 years. Components of the long-term (strategic) management plan are revised and updated at the end of the planning period or when other changes in the management require it. (see also Criterion 8.4)</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The NFMA and 36 CFR 219.10(g) Revision require that forest plans be reviewed every five years and revised at least every 15 years (more frequently if forest conditions significantly change). The Forest Supervisor can recommend revision at any time based on monitoring and evaluation results.</p> <p>The 2004 LRMP resulted from a revision need "...based on new information, changed conditions, and public comments</p>

	<p>since [the prior plans] were developed. The Chequamegon and Nicolet National Forests were separate units when their 1986 plans were approved. Since they are now combined into a single administrative unit (Chequamegon-Nicolet National Forests), one Environmental Impact Statement (EIS) and one Forest Plan have been prepared for both Forests.” Revision work began in 1996. The 2004 Plan contains a clear discussion of the need for revising the Forest Plan in Chapter 1 of the FEIS. The need for implementing changes to management direction for numerous actions are described throughout the LRMP and FEIS.</p> <p>CNNF utilizes a five-year strategy plan for all activities on the Forest that can be revised annually as the Forest situation requires.</p>
--	---

NOTES: None

**7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.**

**Criterion Level Remarks:** Conformance

7.3.a. The forest owner or manager assures that workers are qualified to implement the management plan (see also Criterion 4.2).

Conformance with Indicator: Yes  No  N/A

CNNF and the USDA Forest Service provide training courses for staff throughout the year. Many positions have ongoing training requirements to meet the qualifications for the position. Each CNNF employee, with their supervisor, develops an Individual Development Plan that documents training needs and tracks their progress toward completing the Forest Plan. Also, there is an Intranet site, reviewed by the auditors, which contains a link to provide guidance to employees to enable them to facilitate the Forest Plan.

Program managers have a list of qualifications that are required of employees, which is maintained in a centralized database system. However, there is no centralized tracking of training attended by employee. This is left to employees and not tracked by the CNNF (**OBS 16/06**).

The CNNF employees implied that most loggers participate in training (e.g., [Forest Industry Safety and Training Alliance, Inc. (FISTA)]; however, this is not required by CNNF and the CNNF has no assurances this training is being done for all woods workers (**OBS 17/06**). While CNNF does not provide, or require, formal training for contractors and woods workers, harvesting requirements are consistently relayed to contractors and their workers on a project-by-project basis. For example, Harvest Administrators and certified Timber Sale Administrators are trained to convey information to logging contractors. Pre-harvest meetings to convey information to logging crews regarding sale units are held before every timber harvest. These pre-harvest meetings are often conducted in the office and not on site, although this varies by District. Off-

	<p>site pre-harvest meetings may not be the most effective way to convey site-specific information (e.g., location of wetlands, reserve areas) (<b>OBS 18/06</b>). CNNF staff visit active harvest areas on a weekly basis to ensure that prescriptions are being implemented as planned.</p> <p>Since all merchantable trees must be marked by CNNF prior to cutting, timber markers may mark more trees for harvest in machine access areas than necessary to ensure that problems with “operational” trees do not occur during harvest. One instance of this was observed in the field. Training on the access requirements for various pieces of logging equipment would assist in minimizing this concern (<b>OBS 19/06</b>).</p>
<p>7.3.b. The management plan is understandable, comprehensive, and readily available to field personnel.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF Forest Plan is well-written and is readily available to all employees. As a public entity, this type of transparency is not only expected but mandated by law. As previously stated, there is an Intranet site, reviewed by the auditors, which contains a link to provide guidance to employees to enable them to facilitate the Forest Plan.</p>
<p>NOTES: <b>OBS 16/06</b>: CNNF could improve the likelihood that Forest-wide staff are adequately trained and qualified by maintaining training records for each employeee.</p> <p><b>OBS 17/06</b>: CNNF could consider additional strategies (e.g. require contractors and woods workers to participate in formal training programs) to ensure consistently high standards for harvesting activities.</p> <p><b>OBS 18/06</b>: CNNF could require all pre-harvest meetings to be held on site to ensure that miscommunication does not occur.</p> <p><b>OBS 19/06</b>: CNNF could provide timber markers with training on the access requirements for harvesting operations to ensure that the correct trees are marked for access purposes.</p>	
<p><b>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.</b></p> <p><i>Applicability Note to Criterion 7.4: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 8.5)</i></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>7.4.a. A management plan summary that outlines management objectives (from sub-Criterion 7.1.a.), whether on private lands or the land pool under a resource manager, is available to the public at a reasonable fee. Additional elements of the plan may be excluded, to protect the security of environmentally sensitive and/or proprietary information.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF provides in print and digital form an FEIS Summary and Record of Decision which meet the intent of this Criterion. Additionally, CNNF provides the LRMP, FEIS, and numerous related documents in print, digitally, and on their website. CNNF provides this material broadly and upon request.</p>
<p>7.4.b. Managers of public forests make forestry-related information easily accessible (e.g., available on websites) for public review, including that required by Criterion 7.1.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All forestry-related information required under Criterion 7.1 (except that held as confidential, such as RT&amp;E and cultural resource locations) is readily accessible on CNNF’s website or upon request.</p>
<p>NOTES: None</p>	

**PRINCIPLE 8. MONITORING AND ASSESSMENT - 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.**

**Criteria and Indicators**

**Findings**

**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.**

*Applicability Note to Principle 8: On small and medium-sized forests, an informal, qualitative assessment might be appropriate. On large forests and intensively managed forests, formal, quantitative monitoring is required.*

**Criterion Level Remarks:** Minor non-conformances. CNNF has a well-designed, consistent, and replicable environmental monitoring strategy and is in conformance at the Criterion level. Minor non-conformances are due to missing components.

8.1.a. The frequency of monitoring activities follows the schedule outlined in the management plan.

Conformance with Indicator: Yes  No  N/A

Tables 4.1 (minimum legally required monitoring and evaluation) and 4.2a-c (LRMP monitoring questions by goal) in Chapter 4 of the LRMP detail the monitoring and evaluation activities and schedules for the Forest. The minimum legally required monitoring and evaluation is established by the NFMA and 36 CFR 219.

The publicly-available FY05 Monitoring and Evaluation report provides confirmation by the Forest Supervisor that CNNF has met the monitoring intent of the LRMP and 36 CFR 219. However, upon review of the minimum legally required monitoring content of the report, monitoring data on Canada yew (a Management Indicator Species) and the actual and estimated cost comparison (36CFR219.12(k)(3)) were not found. CNNF confirmed that they had overlooked including monitoring data for these items in the report, that their internal review had already discovered this gap, and that it will be remedied in the FY06 report. While CNNF did not report results due to an oversight, they did complete the legally required monitoring. However, the FY05 report also did not address several LRMP Objectives (e.g., 2.1d, 2.1j, 2.1l, among others) that require annual monitoring, although not necessarily annual evaluation.

CNNF develops an annual monitoring plan to identify and schedule specific monitoring activities for the year. These monitoring plans vary from year to year and are subject to budgetary constraints. As stated in the Draft Monitoring and Evaluation guide, "Budgetary constraints will affect the level of monitoring that can be done in a particular fiscal year. If budget levels limit the Forest's ability to perform all monitoring tasks, then those items specifically required by law are given the highest priority. The annual monitoring plan identifies which items will be measured, and how the monitoring questions will be answered." However, the

	<p>LRMP provides a comprehensive list of “monitoring questions” in Table 4.2 with monitoring frequencies explicitly defined for each issue. By listing these monitoring questions with specific frequencies in the LRMP, the clear inference is that these variables will be monitored in keeping with the defined frequencies. Further, under the heading “Monitoring Questions” on page 4-4 of the LRMP, CNNF states “The purpose of monitoring questions is to determine what type of information to gather and how often to gather it in order to address the goals and objectives. Some resources need to be monitored annually to produce trend data.” This statement only serves to reinforce that certain issues will be monitored every year, as identified in Table 4.2.</p> <p>While the monitoring questions listed in Table 4.2 are not legally mandated, and given that specific monitoring frequencies are identified in the LRMP, by omitting certain variables identified as requiring annual monitoring, CNNF is not following the schedule outlined in the LRMP. (<b>CAR 7/06</b>).</p>
<p>8.1.b. Monitoring is carried out to assess:</p> <ul style="list-style-type: none"> <li>• The degree to which management goals and objectives have been achieved;</li> <li>• Deviations from the management plan;</li> <li>• Unexpected effects of management activities;</li> <li>• Social (see Criterion 4.4) and environmental (see Criterion 6.1) effects of management activities.</li> </ul>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>From Chapter 4 of the LRMP, CNNF monitoring and evaluation are designed to answer: “1. <i>Did we do what we said we were going to do?</i> This question answers how well the direction in the Forest Plan is being implemented. Collected information is compared to Objectives, Standards, Guidelines, and Management Area direction. 2. <i>Did it work how we said it would?</i> This question answers whether the application of standards and guidelines is achieving objectives, and whether objectives are achieving goals. 3. <i>Is our understanding and science correct?</i> This question answers whether the assumptions and predicted effects used to formulate the goals and objectives are valid. This is a well-designed strategy that will provide CNNF with the ability to modify its management methods as information indicates.</p> <p>Tables 4.2a-c in the LRMP provide quantifiable questions for establishing whether the LRMP Objectives are being met on the Forest, as well as documenting deviations from the plan and unexpected effects of management. The environmental effects of CNNF management are clearly being monitored. CNNF does receive direct input from the public at fairly regular intervals through various meetings and interactions at visitor centers, district offices and campgrounds for example. CNNF also monitors annual payments made to local counties. While recreational Objectives are clearly addressed in monitoring social effects, it is less clear that other social effects (such as on forest industry employment) of the CNNF management are being formally monitored. See also findings associated with Indicator 8.2.d.2 (<b>OBS 20/06</b>).</p>
<p>8.1.c. Public and large, private land</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

<p>owners or managers take the lead in identifying, initiating, and supporting research efforts to address pertinent ecological questions. Small and medium private landowners or managers use information that has been developed by researchers and other managers.</p>	<p>CNNF is a partner with external entities in numerous research projects on the Forest and willingly facilitates research projects developed by external entities.</p> <p>CNNF staff are banned from directly conducting research projects since that role is to be accomplished by the USFS Northern Forest Experiment Station. The Station's research priorities may not always address issues of concern to CNNF, which is why CNNF actively partners with other entities.</p>
<p>NOTES: <b>CAR 7/06:</b> CNNF shall ensure that monitoring is completed on schedule as detailed in the LRMP.</p> <p><b>OBS 20/06:</b> In order to facilitate timely and meaningful assessments of their impacts on local communities, CNNF could monitor socio-economic effects (such as on forest industry employment) of management activities on a more frequent basis.</p>	
<p><b>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</b></p> <ul style="list-style-type: none"> <li>a) yield of all forest products harvested,</li> <li>b) growth rates, regeneration, and condition of the forest,</li> <li>c) composition and observed changes in the flora and fauna,</li> <li>d) environmental and social impacts of harvesting and other operations, and</li> <li>e) cost, productivity, and efficiency of forest management.</li> </ul>	
<p><b>Criterion Level Remarks:</b> Minor non-conformance</p>	
<p><b>8.2.a. Yield of all forest products harvested</b></p>	
<p>8.2.a.1. The forest owner or manager maintains records of standing inventories of timber and harvest volumes of timber and non-timber species (quality and quantity).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Standing timber inventories by species and condition class (acceptable, unacceptable, cull, etc.) are maintained within CNNF's forest inventory system. CNNF does not measure tree grade or monitor tree grade change over time for those components of their forest for which published tree grades exist. As a result, in those areas where timber quality is a management variable of interest and timber quality is not superseded by other management goals, the effects of management on timber quality can be only vaguely ascertained (<b>OBS 21/06</b>). Timber harvest volumes are recorded by species and product.</p> <p>All permits for harvesting non-timber products by non-Tribal members have harvest limits for each permit. CNNF is able to estimate the harvest by non-Tribal people by totaling the maximum harvest volumes permitted. GLIFWC conducts surveys to monitor actual harvest levels for conifer boughs, <i>Lycopodium</i>, ginseng, birch bark, and firewood. Data from these surveys is compiled and can be made available to CNNF. The GLIFWC report "Tribal Wild Plant Gathering on National Forest Lands, Harvest Season 2003-2004" was reviewed.</p> <p>Enforcement occurs through CNNF timber staff and law enforcement staff (of which there are four Law Enforcement Officers for the CNNF and approximately 12 Forest Protection Officers per District). Citations were reviewed that</p>

	<p>confirmed that theft of timber and non-timber resources is prosecuted when discovered. Additionally, Native American gathering rights are permitted through the Tribes and GLIFWC and enforced on CNNF lands by Tribal and GLIFWC wardens.</p>
<p><b>8.2.b. Growth rates, regeneration, and condition of the forest</b></p>	
<p>8.2.b.1. An inventory system is established and records are maintained for:</p> <ol style="list-style-type: none"> <li>(1) Timber growth and mortality (for volume control systems);</li> <li>(2) Stocking, and regeneration;</li> <li>(3) Stand-level and forest-level composition and structure (e.g., by use of tools, such as ecological classification systems);</li> <li>(4) Abundance, regeneration, and habitat conditions of non-timber forest products;</li> <li>(5) Terrestrial and aquatic features;</li> <li>(6) Soil characteristics (e.g., texture, drainage, existing erosion);</li> <li>(7) Pest conditions.</li> </ol>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF uses multiple databases for monitoring the condition of the timber resource, including CDS, GIS, FIA, and FSVeg. Forest inventory databases include information on trees (species, volume, stocking, mortality, grade), understory vegetation (including tree regeneration), and down woody debris. CNNF continuously updates their forest inventory databases with the objective of updating 10% of the suitable timber management acreage on an annual basis. Currently, based on their estimates, CNNF is conducting updates on 6-7% of this acreage annually. CNNF classifies their land base using the National Hierarchy of Ecological Units and vegetative habitat typing.</p> <p>While CNNF allows an active program of harvesting non-timber forest products and monitors the quantity of these harvests, CNNF documentation does not clearly address the abundance, regeneration, and habitat conditions of these resources (<b>CAR 8/06</b>).</p> <p>Terrestrial features (including NNIS) and soil data reside in NRIS Terra and/or the GIS. Aquatic features and quality are inventoried in NRIS Water, EPA's Storage and Retrieval system, GIS, and several individual databases. Pest conditions are monitored by USFS or WDNR staff and records are maintained by CNNF.</p> <p>Large amounts of data are collected by CNNF and numerous databases are used to store this data. CNNF recognizes that appropriate linkages are not yet in place between all databases to allow efficient and consistent data management, and analysis (<b>OBS 22/06</b>).</p>
<p><b>8.2.c. Composition and observed changes in the flora and fauna</b></p>	
<p>8.2.c.1. Forest owners or managers periodically monitor the forest for changes in major habitat elements and in the occurrence of sensitive, rare, threatened, or endangered species or communities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF LRMP describes monitoring guidelines for changes in major habitat elements and occurrence of RT&amp;E, RFSS, and other sensitive species and communities. The frequency of monitoring and evaluation are quantified for such species and communities.</p> <p>The CNNF monitors changes in major habitat elements such as stand- and forest-level composition and structure, long-lived conifer components in upland-lowland transition areas, distribution and amount of successional stages, and the size and locations of temporary and "permanent" habitat openings at 5-year intervals (see findings associated with</p>

Criterion 8.2.b). Longer-term transitions from early successional habitats to late-successional types are monitored on a 10-year cycle. CNNF also annually monitors large forest disturbances (>100 ac) to ensure adequate retention of structure and coarse woody debris (CWD) during salvage operations. These habitat elements as well as locations of wetlands, major streams and rivers, and soil resources have been mapped across the CNNF and the GIS is updated as changes occur in individual stands, projects, or larger areas. Aquatic ecosystems are extensively monitored. Efforts to restore stream and lake habitats as well as stream crossing, sedimentation, and fish passage projects are monitored annually. Other efforts, including monitoring aquatic impacts of ATV use, large wood restoration projects, cold-water stream restoration, relocation of roads out of riparian habitats, and similar projects are monitored at least every 5 years. The LRMP calls for 10-year monitoring of ecological communities of special concern within protected areas. The Forest is also monitored with permanent vegetation plots, Forest Inventory and Analysis plots, and stand examination updates, among other activities. However, these monitoring efforts largely focus on timber-based inventory data. Long-term, ecologically-relevant data on forest characteristics, such as understory plant species composition and structure, vertical layering of vegetative strata, and distribution, size and decay classes of snags and CWD are not consistently monitored (**OBS 23/06**).

The CNNF also works with collaborators to monitor more detailed changes in specific habitat elements as a result of management activities. For example, researchers from UW-Green Bay are working with the CNNF to determine short-term effects of selectively logging northern hardwood stands on understory plant species composition and diversity in winter-logged sites and summer-logged sites.

Implementation monitoring is conducted to determine conformance with LRMP guidelines for retention of wildlife den tree and snag habitat elements during timber harvests, but monitoring appears limited in scope (e.g., 1-2 timber sale units/district/year) and unsystematic (**OBS 24/06**). Further, monitoring currently is not conducted to track adequate retention of CWD during normal timber harvest operations at the stand or forest levels (**OBS 24/06**).

The CNNF is legally required by the NMFA and other Forest Service regulations to monitor forest-wide distribution and population trends of RT&E species and communities, RFSS, Management Indicator Species (MIS) and their Management Indicator Habitats (MIH). CNNF uses staff and cooperators to regularly and extensively monitor these species and communities. The Forest Plan calls for annual

	<p>monitoring of RT&amp;E species and RFSS, and 5-year monitoring of recovery and conservation strategies for ESA T&amp;E species and habitat conditions for RFSS. Examples of RT&amp;E, RFSS, MIS, and MIH monitored by CNNF and cooperators in FY2005 included gray wolves, bald eagles, northern goshawks, American marten, northern blue butterflies and their host plant the dwarf bilberry, pine barrens, and brook trout. There is an annual update of the database tracking such species and communities, through the work of ecologists and biologists at both the federal and state level.</p> <p>The audit team visited several sites within the Moquah Barrens Wildlife Area, where efforts to restore globally rare pine barrens (an MIH) have occurred since 1963. CNNF has initiated a cooperative effort with Northland College and the Sand County Foundation to monitor effects of prescribed fire treatments on vegetation responses and the overall effectiveness of pine barren restoration efforts. Other MIS and MIH evaluated by CNNF are identified in Appendix II of the Forest Plan.</p> <p>CNNF annually monitors beaver populations to ensure adequate representation of wetland ecosystems across the landscape while protecting key cold water stream habitats for species such as brook trout. During the last 14-16 years, CNNF and cooperators also have conducted annual surveys for migratory and resident breeding birds on both the Chequamegon and Nicolet land bases. For example, the 16-year-old Nicolet National Forest Bird Survey (NNFBS) represents the longest-running volunteer monitoring program on any U.S. national forest. Collectively these surveys represent an important long-term data set on trends of both migratory and resident bird species.</p>
<p><b>8.2.d. Environmental and social impacts of harvesting and other operations</b></p>	
<p>8.2.d.1. The environmental effects of site-disturbing activities are assessed (e.g., road construction and repair, harvesting, and site preparation).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Sale administrators actively monitor sale units to assess effects as they are being harvested. Data collected during each site visit on erosion, landings, trails, and road maintenance/closure is recorded on Timber Sale Inspection Reports. Road construction projects are monitored as needed during construction and findings are documented on the Contract Daily Diary. Soil Impact Monitoring Reports are compiled by the Forest Soil Scientist based on field review of harvest sites. Both CNNF staff and external agencies monitor CNNF lands (ongoing for CNNF staff and periodically for external agencies) for compliance with state BMPs for water quality. CNNF lands are scheduled to have 30 timber sales reviewed by external entities in FY06.</p>
<p>8.2.d.2. Creation or maintenance of local jobs and public responses to management activities are monitored.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF's FEIS contained a detailed assessment of job creation and maintenance, both under current conditions</p>

	<p>and under various alternatives proposed for the LRMP. Economic impact analysis was used to assess direct and indirect employment levels from impacts of CNNF management on local economies. The CNNF primarily contributes jobs (and income) to three Economic Impact Areas: 1) The Northern Wisconsin Economic Impact Area consisting of 15 counties in northern Wisconsin and Michigan; 2) the Wisconsin Pulp and Paper Economic Impact Area, including nine counties in east central Wisconsin; and 3) the Northern Minnesota Economic Impact Area. The FEIS also contains public responses to proposed management activities by communities and other stakeholders. However, the creation and/or maintenance of regional jobs resulting from CNNF management activities is not monitored beyond the FEIS process during LRMP revision, which could be as long as 18 years. Given the economic importance of the CNNF to surrounding communities, these economic variables could be performed more frequently in order to provide meaningful information. <b>(OBS 20/06)</b>.</p> <p>In addition, NVUM studies (done every five years) monitor recreation visitor responses to recreational activities, particularly for developed overnight sites and activities in forested areas. This study also documents attendance (2.1 million annual visitors in 2003) and produces an economic impact analysis, which tracks employment in the surrounding area related both directly and indirectly to recreation.</p>
<p>8.2.d.3. Sites of special significance to American Indians are monitored in consultation with tribal representatives (see also Principle 3).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Sites of special significance are monitored in consultation with Tribal Bands (See Principle 3). SmartWood viewed field areas where oversight between the CNNF and the Tribes has successfully protected areas of concern.</p>
<p><b>8.2.e. Cost, productivity, and efficiency of forest management</b></p>	
<p>8.2.e.1. Forest owners or managers monitor the cost and revenues of management in order to assess productivity and efficiency.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Project costs and revenues are well documented, as required by federal law. An analysis of feasibility is conducted prior to the initiation of projects. The CNNF keeps records of expenditures and revenues of all forest operations and internally audits them annually. The cost side is built on work plans targeted for acres slated for forest practices (e.g., reforestation) or on non-target items such as campgrounds, depending on the project.</p> <p>The CNNF develops an overall balanced budget in line with OMB guidelines and the staff looks at the budget during execution of activities and after they are complete. This requires documentation of costs associated with carrying out planned management prescriptions as compared with costs estimated in the LRMP. The budget is balanced during the year so that allocations, in line with priorities,</p>

	<p>balance out cost overruns for the year. The USDA Forest Service's Albuquerque Service Center audits the final balance sheet. The soon to be enacted EMS will further enhance the efficiency for monitoring the budget.</p>
<p>NOTES: <b>CAR 8/06:</b> CNNF inventory systems shall include the abundance, regeneration, and habitat conditions of non-timber forest products (especially <i>Lycopodium</i> and moss) that are harvested on the Forest.</p> <p><b>OBS 21/06:</b> CNNF could monitor hardwood tree grades on the Forest to quantify that actual changes in the grade distribution are consistent with the forest commodity goal (Goal 2.5) of the Forest.</p> <p><b>OBS 22/06:</b> CNNF could continue to aggressively address their concerns with consistent data collection and the linkage of the various databases used on the Forest.</p> <p><b>OBS 23/06:</b> CNNF could develop and incorporate long-term monitoring data collection on ecologically-relevant forest attributes such as such as understory plant species composition and structure, vertical layering of vegetative strata, and distribution, size and decay classes of snags and CWD into its monitoring program.</p> <p><b>OBS 24/06:</b> CNNF could develop more extensive and systematic stand-level and forest-wide monitoring (of implementation and effectiveness) of wildlife den tree, snag, and coarse woody debris retention associated with regular timber harvest activities.</p>	
<p><b>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."</b></p>	
<p><i>Applicability Note: For chain-of-custody management requirements, see Section 3.6 of Chain of Custody Standards, FSC Accreditation Manual.</i></p>	
<p><b>Criterion Level Remarks:</b> Minor non-conformance.</p>	
	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF does not have a formal chain of custody (CoC) system to facilitate the tracking of forest products from their origin (<b>CAR 10/06</b>). While key elements associated with control of forest products to and at the forest gate and associated accounting of products sales are well developed, CNNF would need to develop new CoC procedures. Once harvested forest products leave the landing, they leave the jurisdiction of the CNNF. There is a solid record of documentation of species, grade, and volume of forest products by payment unit removed from the landing. This documentation is retained in the Supervisor's Office at the CNNF. See Appendix IV findings.</p>
<p>NOTES: <b>CAR 10/06:</b> CNNF shall develop, document and apply procedures for chain-of-custody. This system shall include:</p> <ul style="list-style-type: none"> <li>• a system to include FMO FSC certificate code and certified description of products on sales and shipping documentation (CoC 5)</li> <li>• a system to ensure that all use of the FSC/SW trademarks, as well as public information related to certification, are submitted to SmartWood for review and approval (CoC 9)</li> </ul>	
<p><b>8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>8.4.a. Discrepancies between outcomes (i.e., yields, growth, ecological changes) and expectations (i.e., plans, projections, anticipated impacts) are appraised and taken into account in the subsequent</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>One of the prime reasons for revising the previous Chequamegon and Nicolet LRMPs was to incorporate new information and changed forest conditions into the revision.</p>

management plan.	<p>Monitoring and evaluation to determine how well the LRMP is working are required under 36 CFR 219. When plan revision work began, leading to the development of the 2004 LRMP, CNNF produced Analysis of the Management Situation reports for 10 identified problem issues on the Forest. These reports, based on monitoring results, provided clarification for needed changes in management direction. Additionally, CCNF revises their management direction prior to full LRMP revision by modifying practices at the project-level as a result of ongoing monitoring and evaluation.</p> <p>A significant concern, on the part of both the auditors and CNNF staff, is that data is typically spread across several databases, which are often unable to communicate directly. This has the potential to impede Forest-wide analyses and may cause difficulties in comparing management results with objectives (<b>OBS 22/06</b>).</p>
NOTES: <b>OBS 22/06:</b> (See Criterion 8.2)	
<p><b>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.</b></p>	
<p><i>Applicability Note to Criterion 8.5: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 7.4)</i></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p>8.5.a. A summary outlining the results of monitoring is available to the public at a reasonable fee, whether on private lands or a land pool under a resource manager or group certification.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF produces an annual Monitoring and Evaluation Report that provides information on minimum legally required monitoring and other monitoring activities conducted on the Forest for that year. CNNF produced an End of Decade Monitoring Report in 1998. Additionally, CNNF will make monitoring data available upon request.</p>
<p>8.5.b. Managers of public forests make information related to monitoring easily accessible (e.g., available on websites) for public review.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF monitoring information is readily available in print or digital form on the CNNF website.</p>
NOTES: None	

**PRINCIPLE 9. MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS -**  
**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.**

**High Conservation Value Forests are those that possess one or more of the following attributes:**

**a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns**

*of distribution and abundance*

*b) Forest areas that are in or contain rare, threatened or endangered ecosystems*

*c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)*

*d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).*

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

**Central Hardwoods:**

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

**North Woods/Lake States:**

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

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

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

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

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

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

<u>Criteria and Indicators</u>	<u>Findings</u>
--------------------------------	-----------------

**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.**

*Applicability Note: Certain information may be withheld from public discussion to protect the attributes that may be of High Conservation Value. The level of delineation and consultations required is dependent on the scale and intensity of the operation.*

**Criterion Level Remarks:** Minor non-conformance

<p>9.1.a. Attributes and locations of High Conservation Value Forests are determined by (see “applicability to old-growth” note in 6.3):</p> <ul style="list-style-type: none"> <li>• identification of globally scaled HCVF attributes that may be present in the forest</li> <li>• identification and description of regionally and locally scaled HCVF attributes and areas that may be present in the landscape and/or certified forest</li> <li>• broadly based consultations with stakeholders and scientists</li> <li>• public review of proposed HCVF attributes and areas</li> <li>• integration of information from consultations and public review into proposed HCVF delineations</li> <li>• delineation by maps and habitat descriptions</li> </ul>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>In characterizing its forest land base, the CNNF has identified, mapped, and protected a number of globally, regionally, and locally scaled HCVF’s. However, the process employed by CNNF does not explicitly label HCVFs as such. Rather CNNF uses their own terminology (e.g., special management areas). These HCVF’s include: 85,500 acres of Old Growth and Natural Features Complexes (88% forested) featuring existing or developing old growth forest as well as other exemplary natural communities; 44,000 acres of Congressionally-designated Wilderness in 5 separate areas (Rainbow Lake, Porcupine Lake, Headwaters, Blackjack Springs, Whisker Lake); 15,500 acres of Wilderness Study Areas identified in the Roadless area Inventory (Flynn Lake, Porcupine Addition, Spring Brook); 11 designated and 34 candidate Research Natural Areas totaling 2,500 and 32,700 acres, respectively, maintained in their natural condition; 66 Special Management Areas on 63,900 acres that include outstanding natural, historical, or recreational features maintained in their natural condition; and 41,000 acres along 228 miles of Wild, Scenic, and Recreational River Corridors.</p> <p>Additionally, CNNF conducted a Forest-wide assessment of each forest cover type to identify potential old growth areas that currently are not protected under at least one of the designations listed above. Of approximately 135,000 acres of forest 90+ years in age (i.e., mature and old growth), CNNF has identified approximately 1000 acres of potential old growth that is not under a protected designation.</p>
--	---

	<p>However, CNNF has not yet ground-truthed these stands to confirm their status as old growth or HCVF elements (<b>CAR 5/06</b>).</p> <p>Individual, site-level HCVF's such as habitats for RT&amp;E species, RFSS, MIS, and other rare and sensitive species are widely scattered and protected across the CNNF landscape. For example, nest sites of bald eagles, northern goshawks, and red-shouldered hawks are identified and buffered. Populations of rare plants are permanently protected in reserve areas during project-level planning (also see findings for Criterion 6.2).</p> <p>CNNF also has identified and restored specific HCVF's such as pine barrens (i.e., Moquah Pine Barrens in the Washburn District). Other non-forest HCVF attributes are protected by CNNF on a project-level basis including natural open areas, distinctive geological landforms, and vernal pools. In addition, CNNF recently designated 7 new Special Management Areas (SMAs) to protect unique or significant geological features within the Forest.</p> <p>As part of the required consultative process initiated by project level timber sales, CNNF staff are mandated to consult broadly with stakeholders, scientists, and local experts. Public review, input, and response to inputs are also mandated for factors including HCVFs. CNNF determined attributes and locations of HCVFs through lengthy and intensive collaboration with many agencies and scientists, including The WDNR Natural Areas Program, Natural Areas Preservation Council (an advisory body to the WDNR Natural Areas Program), WDNR Natural Heritage Inventory, The Nature Conservancy, USFS Northern Experiment Station, university scientists, and others.</p> <p>All currently identified HCVF's are mapped. Descriptions of HCVFs as well as the process by which they were identified, prioritized, and protected are described in the Forest Plan and supporting documents (e.g., Chapter 3 of both the Forest Plan and FEIS; Appendices B and N of the Plan FEIS).</p>
<p><b>AC 9.1.1.</b> By policy and action, managers of National Forests shall demonstrate compliance with Section 2(c) of the Wilderness Act and the Wild and Scenic Rivers Act in the course of identifying and designating HCVF.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF managers comply with Section 2(c) of the Wilderness Act in the course of identifying and designating wilderness areas and other HCVF areas as mandated by federal law. CNNF has identified and protected HCVFs within designated Wilderness Areas and within Wild, Scenic, and Recreational River corridors. These include 44,000 acres of Congressionally-designated Wilderness in 5 separate areas (Rainbow Lake, Porcupine Lake, Headwaters, Blackjack Springs, Whisker Lake); 15,500 acres of Wilderness Study Areas identified in the Roadless Area Inventory (Flynn Lake, Porcupine Addition, Spring Brook); and 41,000 acres along</p>

	<p>228 miles of Wild, Scenic, and Recreational River Corridors.</p> <p>CNNF also periodically evaluates new HCVF attributes for potential designation and protection. For example, during development of the current Forest Plan, CNNF extensively evaluated five new rivers for wild, scenic, and recreational river designations. All of the rivers were determined to be eligible for consideration as wild, scenic, or recreational rivers (Forest Plan FEIS Appendix E).</p> <p>Management guidelines developed for these HCVFs strictly comply with all provisions of Section 2(c) of the Wilderness Act and the Wild and Scenic Rivers Act. These guidelines are found in Chapter 3 of the current Forest Plan (pp. 22-25 and pp. 45-47).</p>
<p><b>AC 9.1.2.</b> National Forest managers review and consider use of existing HCVF planning tools (e.g. Proforest HCVF Tool Kit, Canadian National Framework for HCVF) in the development of a process for identifying HCVF.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF forest managers did not explicitly review or use existing HCVF planning tools in previous or existing processes to (comprehensively) identify HCVFs.</p> <p>However, the process CNNF used to identify such attributes was comprehensive, thorough, and complete. CNNF has used a variety of data and sources to identify old growth and other HCVFs including the WDNR Natural Heritage Inventory database, geologic surveys, wildlife habitat inventories, soil surveys, published and unpublished research, local experts, landowners, and resource managers. CNNF staff employed the WDNR's Natural Heritage Inventory protocols and general ranking procedures to evaluate biotic communities for HCVF potential. This system was developed by The Nature Conservancy and is used in all 50 states. Additionally, CNNF used a classification system developed by the Natural Areas Preservation Council (an advisory body to the WDNR Natural Areas Program) for assigning levels of scaled natural area significance (i.e., state, county, local) based on qualities of these areas.</p> <p>These processes used to identify natural area HCVFs, including old growth, are described in Appendix B of the Forest Plan FEIS. Additional discussion of CNNF identification and evaluation of old growth HCVFs is found in Chapter 3 of both the Forest Plan and Plan FEIS. Specific methodologies for identifying wilderness and wild, scenic, and recreational river HCVFs are described in Appendices C and E, respectively, of the Forest Plan FEIS.</p>
<p>NOTES: <b>CAR 5/06:</b> (See Criterion 6.4)</p>	
<p><b>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</b></p>	
<p><b>Criterion Level Remarks:</b> Conformance</p>	
<p><i>Note: Criterion 9.2 is an instruction to FSC-accredited certification bodies. No</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

<i>indicators are required.</i>	Although CNNF does not explicitly label HCVF attributes as such, it does seek input from regional, state (e.g., WDNR), and local stakeholders, scientists, and naturalists to confirm that it has identified HCVF attributes and correctly identified their locations within the Forest. Current HCVF attributes and locations (e.g., old-growth areas, wilderness areas, research natural areas) are well-established and recognized as such by interested publics, including scientists and local experts. Identification, location, and protection of as yet unidentified HCVF attributes which may be located within project areas scheduled for timber harvest or other management operations is facilitated by consultations with stakeholders, scientists, and natural resource entities (e.g., WDNR Natural Heritage Inventory, The Nature Conservancy) and by a mandated process of public review, input, and USDA Forest Service response to public input regarding the effects of proposed management activities.
---------------------------------	--

NOTES: None.

**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.**

*Applicability Note to Criterion 9.3: The applicability of the precautionary principle and the consequent flexibility of forest management vary with the size, configuration, and tenure of the HCVF:*

- a) More flexibility is appropriate where HCV forest is less intact, larger in area, has a larger area-to-perimeter ratio, and its tenure is assured over the long term.*
- b) Less flexibility is appropriate where HCV forest is more intact, covers a smaller area, has a smaller area-to-perimeter ratio, and future tenure is uncertain based on social considerations, and is consistent with Principle 3.*

**Criterion Level Remarks:** Minor non-conformance

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

Conformance with Indicator: Yes  No  N/A

Although CNNF managers do not specifically identify stands and forests that contain HCV attributes as "HCVF", CNNF comprehensively protects HCVFs by prohibiting or restricting management activities that are inconsistent with their maintenance and restoration. Intensive management activities (e.g., regular timber harvest, mineral extraction, grazing) are not allowed within protected Management Areas (MAs) containing HCVFs. The current Forest Plan (Chapter 3) explicitly identifies management activities that are prohibited and permissible within these areas. Permissible activities are directed towards maintenance or restoration of characteristics that identify the HCVFs. For example, within Old Growth and Natural Features Complexes (MA 8G), timber harvest is not allowed except as salvage operations when such operations protect or enhance existing ecological/conservation attributes that define the HCVFs. Within existing and eligible Wild, Scenic and Recreational River Corridors (MA 8D), no management activities are allowed that would change existing or future wild river status. CNNF does implement control measures

	<p>for invasive species in old growth, HCVF, wilderness areas and other special management areas. Timber harvesting is allowed to occur within scenic segments for the purpose of restoring or enhancing fish and wildlife habitat, visual quality, forest health, tree vigor, and promotion of long-lived, large diameter trees. Within designated Wilderness areas (MA 5), no timber harvest or other active management activities are allowed. Management activities are similarly restricted in other protected areas such that any management that does occur is directed towards protection, enhancement, or restoration of HCVF attributes.</p>
<p>9.3.b. Active management in HCVFs is allowed only when it maintains or enhances high conservation values.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>In HCVFs outside of Management Areas 5 and 8 (i.e., “unprotected” designations), timber harvesting and other active management activities are allowed only if it does not compromise conservation values consistent with HCVF attributes. Active management within designated protected areas is strictly regulated and restricted so that the purpose and result of such management is to maintain or enhance attributes that define the area as an HCVF. These specific guidelines for safeguarding conservation values of HCVFs are provided in Chapter 3 of the Forest Plan (also see findings for Indicator 9.3.a).</p>
<p>9.3.c. The management-plan summary includes information about HCVF management without compromising either the confidentiality of the forest owner or manager or environmentally and culturally sensitive features (see also sub-Criterion 7.1.f).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Although CNNF managers do not specifically identify stands, forests, or areas that contain HCV attributes as “HCVF”, Chapter 3 of the current Forest Plan comprehensively describes standards and guidelines for the management of each protected Management Area that contains HCVF attributes. As mandated by law, the Plan is available to the public. In addition, a summary table of existing and proposed RNAs, SMAs, and Old Growth &amp; Natural Features Complexes (MA 8 E, F, and G) on the CNNF are provided in Appendix N of the Plan FEIS. Information about management and locations of HCVFs are disclosed without compromising environmentally and culturally sensitive features associated with these areas (e.g., specific, sensitive attributes may be excluded from maps made available to the general public).</p>

<p>9.3.d. Forest owners or managers of HCVFs (forests and/or stands) coordinate conservation efforts with forest owners or managers of other HCVFs in the landscape.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>CNNF staff consult with a wide variety of external experts regarding management of HCVFs on the CNNF and within the broader landscape. Specifically, CNNF has worked with WDNR State Natural Areas Program, The WI Board of Commissioners of Public Lands and The Nature Conservancy to identify and protect HCVF in the surrounding areas. CNNF has also identified numerous HCVF's through a landscape-scale assessment of each Landtype Association. The results of this analysis were used in the CNNF Landscape Analysis and Design project, which in turn was used as part of their LRMP revision process.</p>
<p>NOTES: None.</p>	
<p><b>9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain and enhance the applicable conservation attributes.</b></p>	
<p><b>Criterion Level Remarks:</b> Minor non-conformance</p>	
<p>9.4.a. Forest owners or managers of small forests may satisfy this requirement with informal observations (see 8.1 and 8.2.). When observations detect changes, the changes are documented.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>CNNF manages large forests.</p>
<p>9.4.b. Forest owners or managers of mid-sized and large forests monitor activities within and adjacent to HCVFs that may affect HCVF attributes (see Criteria 7.2, 8.1 and 8.2). Monitoring is adequate to track changes in HCV attributes, and may include informal observations. When monitoring detects changes to HCV attributes, the changes are documented.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The CNNF Forest Plan contains provisions for long-term monitoring of protected areas containing HCVFs and other ecological communities of special concern that represent the best examples of those found naturally on the Forest. The Forest Plan calls for 10-year monitoring of protected areas including wild and scenic rivers, research natural areas, special management areas, and old growth areas. Designated old growth areas (MA 8G) are specifically monitored on a 10-year cycle to determine if CNNF is meeting desired conditions within these areas. The Forest Plan also calls for 5-year monitoring of wilderness and potential wilderness acres to determine if desired conditions are being met. Other HCVFs and protected areas are not monitored on a specific schedule, but are visited and evaluated opportunistically in conjunction with other issues.</p> <p>While formal five- and 10-year monitoring protocols are well defined, monitoring HCVFs on shorter time frames is inconsistent. For example, CNNF staff stated that few of their special management areas or wilderness areas had not yet been assessed for the presence of NNIS and that there was not yet a plan to do so. CNNF does not have a consistent approach to annually monitoring some proportion of their HCVFs for changes in attributes. <b>(CAR 9/06)</b>.</p>
<p>NOTES: <b>CAR 9/06:</b> CNNF shall develop a protocol to consistently monitor (at least through informal observations) HCVF areas on an annual basis for changes in HCV attributes. If changes are detected, they shall be documented and measures shall be designed to restore the HCV.</p>	

**PRINCIPLE 10. PLANTATIONS** - Plantations shall be planned and managed in accordance with Principles and Criteria 1 - 9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.

*Applicability note: Plantations are forest areas lacking most of the principal characteristics and key elements of native ecosystems, as a result of such human activities as planting, sowing, or intensive silvicultural treatments like short-term rotations and short-term coppice systems (see Glossary)(see Criterion 6.9 for use of exotics). Planting, seeding, and coppicing do not necessarily result in plantations. Non-forest land being afforested becomes a plantation or a managed natural forest based on the owner's goals and objectives for the land in question as well as the development of its attributes.*

Principle level findings: Tree planting is used on CNNF lands to restore tree species such as white pine, red oak, and eastern hemlock to the landscape and to address long-term desired future condition goals for these species on the forest. In addition to these species, other species such as spruce and tamarack are used to accomplish long-term goals for diversity in forest cover types. Management systems for planted stands are similar to those used for naturally regenerated stands of the same species. While currently established natural pine stands will be managed on extended rotations to develop older forest structures, planted stands will still be managed to at least standard rotation lengths commonly accepted in the region. Intermediate treatments in both naturally regenerated and planted stands will be identical, allowing semi-natural ecological structure to develop similarly in both. Any deficiencies in the management of planted areas will also be found in naturally regenerated areas and will be addressed in Principles 1-9. Thus, Principle 10 is found to be non-applicable to CNNF plantings.

<b>Criteria and Indicators</b>	<b>Findings</b>
<p><b>10.1. The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.</b></p> <p><i>Note: The Working Group considers that this criterion is sufficiently explicit and measurable, so does not require indicators.</i></p>	
10. 1. DOD/DOE 1. Plantations are restored to managed natural forest conditions.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTES: Not Applicable	
<p><b>10.2. The design and layout of plantations should promote the protection, restoration, and conservation of natural forests, and not increase pressures on natural forests. Wildlife corridors, streamside zones, and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the plantation, consistent with the scale of the operation. The scale and layout of plantation blocks shall be consistent with the patterns of forest stands found within the natural landscape.</b></p>	
<b>Criterion Level Remarks:</b> Not Applicable	
10.2.a. Plantation layout minimizes soil degradation and erosion and protects soil and water quality by accounting for slope, aspect, erodibility, and movement of surface water (see also Criterion 6.5).	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.2.b. Plantations are managed and integrated into the surrounding landscape in order to improve natural habitats.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.2.c. For plantation harvests larger than forty acres lacking within-stand retention, the size of the opening is justified by credible scientific analysis.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

<p>10.2.d. Plantations may be re-established on existing plantation sites (see also Criterion 10.5.a.), provided they are consistent with the management plan. They may be established on agricultural lands in historically forested areas (see also Criterion 6.10).</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>
<p>10.2.e. Regeneration in previously harvested areas reaches a mean height of at least ten feet or achieves canopy closure (see Glossary) before adjacent areas are harvested, unless an earlier harvest can be justified by credible scientific analysis. Forest buffers between harvest units are arranged to allow contiguous populations of native species.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>
<p>NOTES: Not Applicable</p>	
<p><b>10.3. Diversity in the composition of plantations is preferred, so as to enhance economic, ecological, and social stability. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes, and structures.</b></p>	
<p><b>Criterion Level Remarks:</b> Not Applicable</p>	
<p>10.3.a. Forests containing plantations are managed to create and maintain structural and species diversity that results in viable wildlife habitat and long-term soil maintenance and replenishment.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>
<p>10.3.b. Plantation-management activities are planned to generate and maintain long-term employment.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>
<p>NOTES: Not Applicable</p>	
<p><b>10.4. The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives. In order to enhance the conservation of biological diversity, native species are preferred over exotic species in the establishment of plantations and the restoration of degraded ecosystems. Exotic species, which shall be used only when their performance is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.</b></p>	
<p><i>Applicability Note: See FSC guidelines regarding Criterion 6.8 for use of GMO's and see Criterion 6.9 for allowable use of exotic species.</i></p>	
<p><b>Criterion Level Remarks:</b> Not Applicable</p>	
<p>10.4.a. The use of exotic plant species (see Glossary) is contingent on peer-reviewed scientific evidence that the species in question is neither invasive nor a threat to the indigenous biodiversity. If non-invasive exotic species of plants are used, their provenance and location of use are documented, and their ecological effects are actively monitored.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>

10.4.b. The genetic composition of plantations is suitable for local conditions and is managed for diversity to avoid infestations of pests.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTES: Not Applicable	
<b>10.5 A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.</b>	
<b>Criterion Level Remarks:</b> Not Applicable	
10.5.a. The ratio of plantations to natural and semi-natural forests (see Glossary), as well as their spatial distribution, maintains and/or restores the landscape to a condition that includes a diversity of community types, wildlife habitats, and ecological functions similar to a mosaic of native forests.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.5.b. On land converted from non-forest uses to forest plantation uses, a percentage of the total area owned in the landscape is maintained as and/or restored to natural and semi-natural forest cover. The minimum percentage plantation area that is maintained in semi-natural or natural forest is: <ul style="list-style-type: none"> <li>- for 100 acres or less, at least 10 percent.</li> <li>- for 101 to 1,000 acres, at least 15 percent.</li> <li>- for 1,001 to 10,000 acres, at least 20 percent.</li> <li>- for &gt; 10,000 acres, at least 25 percent.</li> </ul>	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.5.c. On currently forested land, up to 30% of the area may be managed as plantations (see Glossary). This percentage is reduced to 15% over a 50-year period.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.5.d. Areas of forest and/or plantation to be restored to natural and semi-natural conditions are chosen through a landscape analysis that focuses on enhancing ecological integrity and habitat connectivity.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTES: Not Applicable	
<b>10.6. Measures shall be taken to maintain or improve soil structure, fertility, and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long-term soil degradation or adverse impacts on water quality, quantity, or substantial deviation from stream course drainage patterns. (See Criterion 6.5. and its indicators.</b>	
<i>Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required.</i>	
NOTES: Not Applicable	

**10.7 Measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire, and invasive plant introductions. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers. Plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7.**

*Note: The Working Group considers that this criterion is sufficiently explicit and measurable, so does not require indicators.*

NOTES: Not Applicable

**10.8 Appropriate to the scale and diversity of the operation, monitoring of plantations shall include regular assessments of potential on-site and off-site ecological and social impacts (e.g., natural regeneration, effects on water resources and soil fertility, and impacts on local welfare and social well-being), in addition to those elements addressed in principles 8, 6, and 4. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access.**

*Note: The Working Group considers that this criterion is sufficiently explicit and measurable, so does not require indicators.*

**10.9 Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification. Certification may be allowed in circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly for such conversion.**

*Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required*

NOTES: Not Applicable

## APPENDIX IV: Chain of Custody Standard Conformance Checklist (confidential)

**Note:** The following section is for the evaluation of FMO's without processing facilities. All operations with primary and secondary processing facilities must be evaluated using the complete chain of custody standard and a separate report is required for each processing facility.

**Definition of Forest Gate:** The CNNF forest gate is the point where forest products exit the purchase unit boundary.

Chain of Custody Criteria	Yes	No	NA	Explanatory notes/ CAR or OBS	CAR
CoC 1: FMO maintains effective control of forest products from standing timber until ownership is transferred at the forest gate.	X			All products produced under a given harvest contract originate within the harvest/purchase unit boundaries. All CNNF lands are included in the scope of this evaluation.  (NOTE: This is a test evaluation project. A certificate will not be issued to the CNNF.)	
CoC 2: System has procedures for handling non-certified wood which originate outside the scope of this certificate. Note: If no outside wood is utilized mark as NA			X	All CNNF lands are included in the scope of this evaluation. The CNNF only sells products from its lands. Thus, no wood originates from outside the scope of this evaluation.  (NOTE: This is a test evaluation project. A certificate will not be issued to the CNNF.)	
CoC 3: Risk of contamination of certified wood and Non timber forest products by non certified products is controlled.	X			At the forest landing, and at all stages of harvest preceding the landing, products originating from other ownerships are not present, consequently there is no risk of commingling wood from CNNF with wood from other properties. Non-timber forest products are not included under the scope of the evaluation.	
CoC 4: A system exists that ensures that certified forest products are clearly distinguished from non-certified products through marks or labels at all stages of processing to final sales at the forest gate?			X	All products within the forest gate would be certified. There would be no mixing with non-certified products and, thus, no need for distinguishing marks.	
CoC 5: A system exists to include FMO FSC certificate code and		X		The CNNF currently does not have a system readily available to ensure	<b>CAR 10/06</b>

certified description of products on sales and shipping documentation (e.g. waybill and invoices).				forest products are clearly distinguishable from non-certified products. Each timber sale contract and prospectus would need to include a description of the wood as FSC certified and also include CNNF's FSC registration number.  (NOTE: This is a test evaluation project. A certificate will not be issued to the CNNF.)	
CoC 6: If the FMO sells mixed products that combine certified and non certified wood, procedures exist that demonstrate compliance with FSC minimum thresholds and record keeping requirements. If no mixed products are sold mark as NA.			X	CNNF does not sell mixed products.	
CoC 7: Volume and source data on loads of raw material (certified logs) is available (i.e. scaled, inventoried, measured) in the forest, in transport, and at intermediate storage yards, processing and distribution centers controlled by FMO.	X			CNNF maintains records of harvest volumes as hardwood or softwood pulp/chips or species and grade of sawtimber for each harvest unit and the harvesting contractor was recorded for each harvest unit.	
CoC 8: Record keeping system exists that maintains certification related documents (sales, shipping and other applicable documentation). Documents are kept in a central location and/or easily available for inspection.	X			All records are maintained at the CNNF Supervisor's Offices and the Forest Service Regional Office.	
CoC 9: A system exists to ensure that all use of the FSC/SW trademarks, as well as public information related to certification is submitted to SmartWood for review and approval.			X	CNNF has not agreed to obtain approval from SmartWood prior to the use of SmartWood and FSC trademarks, but, if this were an actual certification evaluation, it is expected they would agree.  (NOTE: This is a test evaluation project. A certificate will not be issued to the CNNF.)	<b>CAR 10/06</b>
CoC 10: FMO has procedures for compiling annual report on sales to SmartWood containing monthly sales in terms of volume of each certified products to each customer. For small operations copies of invoices/waybills are	X			CNNF's computerized database can produce volume reports by harvest unit, product, and purchaser.	

sufficient.					
-------------	--	--	--	--	--

**Contamination Risk:** Using the table below describe the risk of products from non certified sources being mixed with products from the forest area evaluated (include source or point of risk and importance) and describe the control system in place that addresses the identified risk.

Point of Possible Contamination	Description of Risk	Risk control measure
There is no risk of mixing non-certified with certified products prior to the forest gate.	NA	NA

<b>CAR #: 10/06</b>	<b>Reference Standard #: 8.3, CoC 5, CoC 9</b>
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	CNNF does not have a formal CoC. While key elements associated with control of forest products to and at the forest gate and associated accounting of products sales are well developed, CNNF would need to develop new CoC procedures.
<b>Corrective Action Request:</b> CNNF shall develop, document and apply procedures for chain-of-custody. This system shall include:	
<ul style="list-style-type: none"> <li>• a system to include FMO FSC certificate code and certified description of products on sales and shipping documentation (CoC 5)</li> <li>• a system to ensure that all use of the FSC/SW trademarks, as well as related public information, are submitted to SmartWood for review and approval (CoC 9)</li> </ul>	
<b>Timeline for Compliance:</b> Not applicable (test evaluation).	

## APPENDIX VI: List of all visited sites (confidential)

District	Site Name	Sale NEPA decision	Auditor	Type of site / short description of site
Eagle River-Florence	Deerskin		Pubanz, Taylor, Russell	Cold-water stream habitat modification and bank stabilization. Removing old habitat structures and alder brush.
Eagle River-Florence	Elvoy Dam		Pubanz, Taylor, Russell	Restore cold-water stream flow by removing logging dam remnants.
Eagle River-Florence	Brule Creek		Pubanz, Taylor, Russell	Improve fish passage, reduce sedimentation, and restore steam channel by installing aluminum box culvert and erosion control devices.
Eagle River-Florence	Pine River Crooked Neck Timber Sale	Lone Duck (1997)	Pubanz, Taylor, Russell	PU 4: Completed spruce thinning, spruce high-risk, SMZ along Pine River. PU 3: Completed uneven-aged hardwood selection, slash disposal along private property boundary
Eagle River-Florence	North Haystack Timber Sale	Lone Duck (1997)	Pubanz, Taylor, Russell	PU 11: Completed hardwood shelterwood first cut, slash disposal along road, adjacent wetland. PU 6: Completed uneven-aged hardwood selection, slash disposal along road. PU 1: Reserve Area containing threatened plant species.
Eagle River-Florence	Hunter Walking Trail		Grado	Multi-partner management (brushing, mowing) of walking trails on CNNF lands.
Eagle River-Florence	Hidden Lakes Trail Foot Bridge		Grado	Project between CNNF and partners to construct foot bridge, thereby reducing riparian area damage.
Eagle River-Florence	Franklin-Butternut Lake Garlic Mustard		Pubanz, Taylor, Russell, Grado	Chemical control of NNIS along recreational trails.
Eagle River-Florence	Echo Lake Special Management Area		Pubanz, Taylor, Russell, Grado	Old-growth hemlock-hardwoods.
Lakewood-Laona	Richardson Timber Sale	Freedom (1996)	Pubanz, Taylor, Kotar	PU 18: Completed uneven-aged hardwood selection, wetland buffers, road construction, soil impacts. PU 11: Marked/uncut spruce salvage to release aspen regeneration. PU 17: Completed uneven-aged hardwood selection. PU 2: Completed clearcut with retention, wetland skid trail crossing.
Lakewood-Laona	Bog Brook Timber Sale	Freedom (1996)	Pubanz, Taylor, Kotar	PU 13: Marked/uncut uneven-aged hardwood selection, Reserve Area for cultural resources. PU 14: Completed uneven-aged hardwood selection, Reserve Area for cultural resources.

Lakewood -Laona	Linse Road Project		Pubanz, Taylor, Kotar	Two cold-water stream crossings, closure and reconstruction to improve fish passage and streamflow.
Lakewood -Laona	Cloud Nine Timber Sale	2004 Spruce Decline Project (2005)	Pubanz, Taylor, Kotar	PU 5: Completed spruce decline salvage and regeneration to aspen, gated access. PU 1: Completed spruce decline salvage with intent to naturally regenerate hardwood, hardwood regeneration sporadic.
Lakewood -Laona	County C Wetland Rehabilitation		Pubanz, Taylor, Kotar	Road removal from wetland and restoration of wetland and stream to original condition.
Lakewood -Laona	Oak Wilt Control Areas		Pubanz, Taylor, Kotar	Oak wilt identification and control: stump removal and trenching
Lakewood -Laona	Lackawana Timber Sale	Thunder Springs (1997)	Pubanz, Taylor, Kotar	PU 17: Completed red oak shelterwood prep cut, site preparation. PU 18: Completed red oak shelterwood prep cut, poor tree felling techniques. PU 21: Completed even-aged hardwood thinning, SMZ, operating restriction (date) for endangered animal species.
Medford- Park Falls	Sloop Timber Sale	Hoffman- Sailor West (2003)	Pubanz, Taylor	PU 1: Completed red pine thinning, adjacent stand of high-risk spruce not scheduled for harvest. PU 10: Uncut overstory removal to release younger spruce, marked reserve trees, adjacent wetland. PU 11: Uncut aspen clearcut, Reserve Area for wetland, marked reserve trees, narrow uncut buffer along wetland
Medford- Park Falls	Abbey Salvage Timber Sale	2004 Spruce Decline Project (2005)	Pubanz, Taylor	PU 6: Active spruce decline salvage, regenerating to aspen, Reserve Areas are aesthetic buffers along road, wetland reserved in unit by sale administrator.
Medford- Park Falls	Sea Dog Timber Sale	Hoffman- Sailor West (2003)	Pubanz, Taylor	PU 17: New road construction by sale purchaser.
Medford- Park Falls	Wilson Flowage		Pubanz, Taylor	Multi-partner dam replacement project, currently in drawdown to kill submergent weeds.
Medford- Park Falls	Riley Lake Wildlife Management Area		Pubanz, Taylor	6000-acre unit with 1800 acres maintained through prescribed burns.
Medford- Park Falls	South Fork Flambeau River Restoration Project		Pubanz, Taylor	Warm-water river that is a candidate Wild, Scenic, and Recreational River. Project to narrow and deepen stream channel and to restore in-stream habitat complexity.
Medford- Park Falls	Vanderveen Wetland Restoration Project		Pubanz, Taylor	Removal of dikes and trail fill from wetlands.
Medford- Park Falls	Round Lake Cultural Sites		Pubanz, Taylor	Rehabilitation of historic logging dam.

Great Divide	Dead Horse Run ATV Trail		Pubanz, Taylor, Russell, Grado	Reconstructed multi-use motorized trail.
Great Divide	Clam Lake NNIS Project		Pubanz, Taylor, Russell, Grado	Spotted knapweed control in barrow pit.
Great Divide	Snowmobile Trail Re-route		Pubanz, Taylor, Russell, Grado	New trail development through red pine stand.
Great Divide	Clam Lake ELF Site		Pubanz, Taylor, Russell, Grado	Facility decommissioning and deconstruction, maintenance of elk habitat
Great Divide	Elk Viewing Area Prescribed Burn		Pubanz, Taylor, Russell, Grado	Use of prescribed fire to control encroaching woody vegetation, viewing area development.
Great Divide	Tree Drops (Black Lake)		Pubanz, Taylor, Russell	Providing large woody debris along lake shore lines to improve fish habitat.
Great Divide	Spider Timber Sale	Two Axe (1997)	Pubanz, Taylor, Russell	PU 3: Completed even-aged hardwood thinning, hiking trail through unit, perched wetlands, adjacent to lake.
Great Divide	Moose Spruce Timber Sale	2004 Spruce Decline Project (2005)	Pubanz, Taylor, Russell	PU 1: Completed salvage, area to be planted to black spruce and larch. PU 4: Completed spruce salvage with intent to utilize natural hardwood regeneration, hardwood regeneration weak at this time.
Great Divide	Weasel Timber Sale	Two Axe (1997)	Pubanz, Taylor, Russell	PU 1: Completed even-aged spruce thinning, spruce now declining with high mortality.
Washburn	Pipeline Jack/Moquah		Russell, Grado, Kotar	Moquah Barrens Wildlife Area: Moquah Units 17 and 18, and Pipeline Jack Units 1, 2 and 8. Harvesting and burning for open lands maintenance.
	Haney		Russell, Grado, Kotar	Moquah Barrens Wildlife Area: Moquah Unit 7d (aka Hayney Experimental Burn Area). A study to investigate whether barrens habitat can be restored from forested condition by frequent prescribed burning without harvesting.
	Moquah 6B		Russell, Grado, Kotar	Moquah Barrens Wildlife Area: Moquah Unit 6b. A red pine plantation burned two years ago and scheduled to burn again in 2007.
	Croaked Oak Timber Sale	Oak Salvage CE	Pubanz, Taylor, Russell, Grado, Kotar	PU 3: Completed salvage removing all dead trees and those with less than 50% live crown, healthy oak were retained.
	Summit Lake II Timber Sale	Sunken Moose (2004)	Pubanz, Taylor, Russell, Grado,	PU 1: Marked/uncut even-aged red pine/jack pine thinning.

			Kotar	
	Cozy Corner Timber Sale	Sunken Moose (2004)	Pubanz, Taylor, Russell, Grado, Kotar	PU 4: Active even-aged oak thinning, completed and uncut areas. PU 6: Marked/uncut even-aged red pine thinning.
	North Fork Timber Sale	Sunken Moose (2004)	Pubanz, Taylor, Russell, Grado, Kotar	PU 9: Marked/uncut even-aged oak thinning, numerous vernal pools.
	Brinks 251		Pubanz, Taylor, Russell, Grado, Kotar	Prescribed burn to develop multi-age structure in jack pine cover type.
	Vahalla View Timber Sale	Sunken Moose (2004)	Pubanz, Taylor, Russell, Grado, Kotar	PU 10: Active oak shelterwood prep cut, recreational trails

## APPENDIX VII: Detailed list of stakeholders consulted (confidential)

### List of FMO Staff Consulted

Name	Organization	Contact information	Contacts
Adams, Susanne	Wildlife Biologist	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey, field interaction
Ahlf, Veronica	Resource Assistant	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Ahlf, Richard	Supervisory Engineering Technician	Lakewood-Laona Ranger District 4978 Hwy 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey, field interaction
Ambright, Stephanie	Asst. Ranger, Administration	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
Andersen, Mike	Computer Assistant	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, office interaction
Anderson, Erick	Forester	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey
Anderson, Renee	Forestry Aid	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
Anderson, Roger	Supervisor Recreation Technician	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, office interaction
Anderson, Scott	Wildlife Biologist	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey, field interaction
Anderson, Tim	Law Enforcement Officer	Lakewood-Laona Ranger District 4978 Hwy 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey

Archie, Anne	Forest Supervisor	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, opening meeting, office interaction, field interaction, stakeholder meeting, closing meeting
Babineau, Maxine	Office Automation Clerk	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Bablick, Mike	Wildlife/Fisheries Technician	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Bacon, Randy	Civil Engineering Technician	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
Baker, Michael	Forestry Technician	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Barbian, Alan	Office Automation Assistant	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Barker, Phil	Lands/Recreation Program Manager	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Barott, Joyce	Admin. Support Assistant	Northern Great Lakes Visitor Center 29270 CTH G Ashland, WI 54806 715-685-9983	Public notice, mail survey, office interaction
Bathel, Dave	Forester	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, office interaction
Belanger, Ken	Forester	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Belanger, Ken	Forester	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey, field interaction
Benzing, Scott	Forestry Technician	Eagle River-Florence Ranger District 1247 E. Wall St.	Public notice, mail survey

		Eagle River, WI 54521 715-479-2827	
Bey, Dawn	Infrastructure Database Admin	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey
Beyer, Patty	Acting NEPA/FOIA Coordinator	906-226-1499	Public notice, mail survey
Block, Betty	Information Receptionist	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Bloomquist, Ralph	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey, field interaction
Bluedorn, Dale	Forestry Technician	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Borcovan, Mark	Law Enforcement Officer	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, office interaction
Borman, Nancy	Business Mgt. Assistant	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey
Branch, Andy	Forester Trainee	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey
Brehm, Lisa	Cartographic Technician	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Briesacher, Deb	Computer Assistant	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey
Bronson, Joshua	Biological Science Technician	Oconto River Seed Orchard 18100 Saul's Spring Road White Lake, WI 54491 715-276-7400	Public notice, mail survey
Browen, Allen	Forestry Technician	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey

Brownell, Dave	Surveying Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Bruhy, Mark	Archaeologist	68 S. Stevens St. Rhineland, WI 54501 715-362-1300 mbruhy@fs.fed.us	Public notice, mail survey, office interaction, e-mail correspondence
Brunner, Christine	Biological Scientist	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, opening meeting, office interaction, field interaction
Campbell, Dave	Civil Engineering Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Carlson, Joann	Office Automation Clerk	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Carlson, Randy	Timber Sale Administrator	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey
Chandler, Geoff	Natural Resources/ Ecosystems Group Leader	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey meeting, opening meeting, office interaction, field interaction, stakeholder meeting, closing meeting, telephone contact
Chaney, Connie	District Ranger	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey, field interaction
Christianson, John	Equipment Operator	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Churchill, Jim	Supervisory Forestry Technician	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey, field interaction
Churchill, Paula	Engineer	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey
Comstock, Jean	Office Automation Clerk	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521	Public notice, mail survey, office interaction

		715-479-2827	
Corey-Luce, Cristi	NEPA Writer	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Crawford, Carl	District Fire Management Officer	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Crocket, Richard	Civil Engineering Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Cukla, Carey	Forestry Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Dalka, Stephanie	Support Services Supervisor	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey, office interaction
Dane, Linda	Business Management Assistant	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey, office interaction
Darnell, Jane	Resource Policy Analyst	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Dean, Daryl	Lake States Architect	68 S. Stevens St. Rhineland, WI 54501 715-362-1360	Public notice, mail survey
Delay, Chantelle	Botanist	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, field interaction
Dennis, Lorrie	Resource Assistant	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Derickson, Deb	Office Automation Assistant	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Dilley, Mark	Assistant Ranger, Timber	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey, field interaction
Dinsmore, Becky	Director of Forest Lodge	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, office interaction
Dupuis, Betty	Resource Assistant	Eagle River-Florence Ranger	Public notice, mail

		District 4793 Forestry Drive Florence, WI 54121 715-528-4464	survey
Eckardt, Sara	Watershed Specialist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Ecklund, Daniel	Wildlife Biologist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Eder, Jeff	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Egdorf, Rich	Forestry Technician	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
Elkins, M.H. Chip	Law Enforcement Officer	118 S. 4 <sup>th</sup> Avenue E Ely, MN 55731	Public notice, mail survey, office interaction
Ellingson, Bob	Forestry Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey, field interaction
Enders, Carol	Computer Assistant	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Erickson, Randy	Land Surveyor	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, office interaction
Ernest, Mitzi	Asst. Ranger, Administration	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey
Euclide, Jenny	IT Specialist (ISO)	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Feit, Ginger	Lead Purchasing Agent	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, office interaction
Flory, Suzanne	Acting Public Affairs Officer	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Flunker, Mark	Forestry Technician	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey, field interaction
Fox, Cathy	Public Affairs Specialist	68 S. Stevens St. Rhineland, WI 54501	Public notice, mail survey, office

		715-362-1300	interaction, telephone contact, e-mail correspondence
Frater, Benjamin	Ecologist	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Freeman, Phil	Assistant Ranger, Timber	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey, field interaction
Gardebrecht, Al	Equipment Operator	Lakewood-Laona Ranger District 4978 Hwy 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Geidel, Chris	Forestry Technician	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey
Gibson, Bill	Criminal Investigator	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey, field interaction
Gifford, Juliet	Wildlife Biologist	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Gilbertson, Cookie	Executive Secretary	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Glonek, Jeremiah	Forestry Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Gordon, Thomas	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Grant, Jim	Forest Fire Management Officer	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Harnois, Mike	GIS Specialist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Harrell, Dan	Support Services Supervisor	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Harrison, Al	East Zone Fire Management Officer	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Harrison, Dale	Assistant Ranger, Administration	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541	Public notice, mail survey

		715-674-4481	
Hartman, Linda	Admin. Support Clerk	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541  715-674-4481	Public notice, mail survey
Heeringa, Brian	Fire Technician	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Heeringa, Brian	Biological Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Helmig, Lisa	Forester	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Hennes, Robert	District Ranger	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Herning, Scott	Forestry Technician	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Herrett, Jeff	Forester	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, field interaction
Higgins, Dale	Hydrologist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Higgins, Jeanne	Deputy Forest Supervisor	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, opening meeting, field interaction
Hillner, Dave	Civil Engineering Technician	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
Hinson, Dale	Forester	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Hobbs, Linda	Support Services Supervisor	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891	Public notice, mail survey

		715-373-2667	
Hoecker, Steve	Center Director	Northern Great Lakes Visitor Center 29270 CTH G Ashland, WI 54806 715-685-9983	Public notice, mail survey, office interaction, stakeholder meeting
Hoefflerle, Ann	Plant Ecologist	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey, field interaction
Holmes, Teresa	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Hong, James	Asst. Ranger, Recreation	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey
Hoppe, Dave	Soil Scientist	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey, opening meeting, field interaction, closing meeting
Hoppe, Don	Administrative Officer	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey, office interaction
Hoppe, Patricia	Procurement Clerk	715-362-1107	Public notice, mail survey
Hubacher, Bob	Engineering Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, office interaction
Huettl, Don	Lead Equipment Operator	Lakewood-Laona Ranger District 4978 Hwy 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Humphrey, Chuck	Law Enforcement Officer	Great Divide Ranger District 10650 Nyman Ave. Hayward, WI 54843 715-634-4821	Public notice, mail survey
Jacobson, Chad	Forestry Technician	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey
Janke, Steve	Ecologist	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Jaskowiak, Jerry	Fire/Fuels Mgt.	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey, field interaction
Johnson, Amy	IT Specialist (ISO)	Lakewood-Laona Ranger District	Public notice, mail

		4978 Hwy. 8 W Laona, WI 54541 715-674-4481	survey
Kaiser, Pat	Forestry Technician	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey
Kangas, Steven	Engineering Equip. Operator	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey
Kasper, Kathy	Forestry Technician	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Kelnhofer, Matthew	Forestry Tech	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Kempf, Lenny	Zone Fire Mgt. Staff Officer	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Kidd, Debra	Staff Officer; Planning, Analysis, Public Affairs	68 S. Stevens St. Rhinelander, WI 54501 715-362-1300 dpkidd@fs.fed.us	Public notice, mail survey, office interaction, stakeholder meeting, e-mail contact
Kilger, Richard	Automotive Mechanic	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Kilger, Toby	Heavy Equipment Operator	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Klein, Donna	Office Automation Assistant	68 S. Stevens St. Rhinelander, WI 54501 715-362-1300	Public notice, mail survey
Knaack, Willie	Civil Engineer	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Knight, Greg	Forest Geologist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Lalonde, James	Forester TMA	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Lampereur, John	Assistant Ranger, NEPA/Ecosystems	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138	Public notice, mail survey, field interaction

		715-276-6333	
Larsen, Karen	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Larson, Frank	Forestry Technician	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Lepkowicz, William	Motor Vehicle Operator	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Lesch, Chris	Forestry Technician	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey, field interaction
Lester, John	Forestry Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Liermann, Sherryl	Forestry Technician	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey, field interaction
Lindberg, Tammy	IT Specialist (ISO)	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Long, Sheila	Timber Financial Assistant	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey, office interaction
Lopez, Veronica	GIS Specialist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Lucas, Mary	Fire NEPA Specialist	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Maday, Theresa	Assistant Ranger, Recreation/Lands	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey, field interaction
Marburger, Joan	Administrative Support Assistant	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Marquart, Candy	Procurement Technician	715-362-1187	Public notice, mail survey
Martin, Eric	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Matthiae, Tom	Wildlife Biologist	Great Divide Ranger District PO Box 896	Public notice, mail survey, , field

		Hayward, WI 54843 715-634-4821	interaction
Mayer, Greg	Surveying Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Maziasz, Jennifer	Biological Scientist, NEPA Coordinator	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey, field interaction
Meier, Anita	Purchasing Agent	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Meier, Dawn	Recreation Planner	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Miller, Evan	Forester	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Miller, Jim	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Miller, Mike K.	Civil Engineering Technician	Lakewood-Laona Ranger District 4978 Hwy 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey, field interaction
Mineau, Jim	Hydrologist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Mineau, Krisan	Cartographer	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Moe, Kathy	Biological Technician	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey
Moffitt, Andy	Forestry Technician	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey
Moris, Tom	Wildlife Biologist	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey, field interaction
Navratil, Paula	Admin. Support Assistant	Northern Great Lakes Visitor Center 29270 CTH G Ashland, WI 54806 715-685-9983	Public notice, mail survey
Nelson, Susan	Outdoor Recreation	Northern Great Lakes Visitor	Public notice, mail

	Planner	Center 29270 CTH G Ashland, WI 54806 715-685-9983	survey, office interaction
Newman, Russ	Timber Sales	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Obenhoffer, Vicky	Timber Financial Assistant	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Osborne, Craig	Forestry Technician	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Ostrum, Paul	Forestry Technician	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey
Ouettette, Sandy	Administrative Support Clerk	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey, office interaction
Parker, Linda R.	Biological Scientist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction, telephone interaction
Pastori, Joe	Forestry Technician	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
Pastori-Merrill, Ruth	Business Mgt. Assistant	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
Paterson, Jamie	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Peczynski, Mike	Assistant Ranger, Wildlife	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, filed interaction
Pederson, Ryan	Sale Administrator	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891	Public notice, mail survey, field interaction

		715-373-2667	
Pete, Don	Forestry Technician	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey
Pete, Lloyd	Forestry Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Peters, Rick	Forestry Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Peterson, Vic	Forestry Technician	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Petruzalek, Jerry	Cartographer	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Pohl, Randy	Engineering Equipment Leader	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Poquette, Dave	Assistant Ranger, Timber	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey, filed interaction
Posner, Scott	Wildlife Biologist	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey, field interaction
Potaracke, Kim	Archaeological Technician	68 S. Stevens St. Rhinelander, WI 54501 715-362-1300	Public notice, mail survey
Proctor, Deb	Integrated Resource Analyst	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey, field interaction
Quade, Virgil	Forestry Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Queen, John	Forestry Tech Firefighting	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey
Quinn, Brian	Acting Forest Planner	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey

Raade, Robert	Silviculturalist	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Radaj, Steve	Assistant Fire Management Officer, Dispatch Manager	8831 Hatchery Rd. Woodruff, WI 54568 715-358-1353	Public notice, mail survey
Reinecke, Sue	Fisheries Biologist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Reppert, Dwayne	Supervisor Engineering Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, filed interaction
Richards, Darrell	Assistant Ranger, Recreation	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Richards, Jim	Fleet Equipment Specialist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Roder, Bill	Forestry Technician	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Rolo, Daniel	Tractor Operator	Oconto River Seed Orchard 18100 Saul's Spring Road White Lake, WI 54491 715-276-7400	Public notice, mail survey
Ruether, Bev	Forestry Technician (Recreation)	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Sabin, Brian	Dispatch/Fire Prevention	8831 Hatchery Rd. Woodruff, WI 54568 715-358-1353	Public notice, mail survey
Sabin, Teri	Supervisory Contract Specialist	3654 Nursery Road Rhineland, WI 54501 715-362-1177 <a href="mailto:tasabin@fsa.fed.us">tasabin@fsa.fed.us</a>	Public notice, mail survey, office interaction
Sandoval, Larry	District Ranger	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey, field interaction
Sarow, Jim	Forestry Technician	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey, field interaction
Saunders, Jay	District Fire Mgt. Officer	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey, field interaction
Sauter, Timothy	District Fire Equip. Operator	Lakewood-Laona Ranger District 4978 Hwy. 8 W	Public notice, mail survey

		Laona, WI 54541 715-674-4481	
Scheuerman, Mary	Legal Instruments Examiner	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Schlice, Stephen	Civil Engineering Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Schmidt, John	GIS Analyst	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Schoenebeck, Kim	Supervisory Forestry Technician	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey, field interaction
Schreiber, April	Budget Analyst	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Schumacher, Paul	Timber Sale Administrator	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey, field interaction
Schutt, Nicole	Biological Technician	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Schwartz, Jeff	Forestry Technician	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Shaffer, Bonnie	Budget Coordinator	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Simonis, Mary	IT Specialist (ISO)	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Skjerven, Harrv	District Ranger	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, filed interaction
Smith, Charley	Heavy Equipment Operator	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Smith, Tina M.	Resource Specialist (Timber)	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey
Smits, Randy	Civil Engineering Technician	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521	Public notice, mail survey

		715-479-2827	
Smugala, Kristine	Property Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Sommer, Ted	Surveying Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Spickerman, Steve	Zone Plant Ecologist	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey, field interaction
Sprister, Steve	Civil Engineering Technician	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
St. Pierre, Matt	Ecologist Sci Tech	68 S. Stevens St. Rhinelander, WI 54501 715-362-1300	Public notice, mail survey
Stalker, Fresia	Admin Support Clerk	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey
Stanfield-Smith, Joan	Lands/Forester	68 S. Stevens St. Rhinelander, WI 54501 715-362-1300	Public notice, mail survey
Statezny, Jamie	Civil Engineering Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Stein, Wendy	Computer Programmer	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey, field interaction
Strauss, Dick	Timber Management Administrator	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey
Sullivan, Bill	Forest Engineer	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Swanson, Phyllis	Office Automation Clerk	68 S. Stevens St. Rhinelander, WI 54501 715-362-1300	Public notice, mail survey
Sweeney, Carrie	Seed Orchard Manager	Oconto River Seed Orchard 18100 Saul's Spring Road White Lake, WI 54491	Public notice, mail survey
Sweeney, Paul	Integrated Resource Analyst	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey, field interaction
Tallier, Carol	Resource Assistant (Timber)	Lakewood-Laona Ranger District 4978 Hwy. 8 W	Public notice, mail survey

		Laona, WI 54541 715-674-4481	
Theisen, Mark	Silviculturist	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey, opening meeting, office interaction, field interaction, stakeholder meeting, closing meeting
Thompson, James	Forestry Technician	Medford-Park Falls Ranger District 850 N. 8 <sup>th</sup> ., Hwy 13 Medford, WI 54451 715-748-4875	Public notice, mail survey
Thompson, Kim	MV Operator/Forestry Tech	Lakewood-Laona Ranger District 4978 Hwy 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Thompson, Tamie	Contract Specialist	231-723-2211, ext. 134	Public notice, mail survey
Thorp, Karen	Manpower Development Specialist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Treml, Arnold	Forestry Technician	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Tucek, Lora	Information Receptionist	Great Divide Ranger District PO Box 896 Hayward, WI 54843 715-634-4821	Public notice, mail survey
Tully, Brett	Engineering	Lakewood-Laona Ranger District 4978 Hwy 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Van Cleve, Jerry	Forester	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey, field interaction
Van Cleve, Monica	Administrative Assistant	Northern Great Lakes Visitor Center 29270 CTH G Ashland, WI 54806 715-685-9983	Public notice, mail survey, office interaction
Vanzo, Karen	Safety and Occupational Health Officer	68 S. Stevens St. Rhineland, WI 54501 715-362-1300	Public notice, mail survey, office interaction
Vassar, Don	Forestry Technician	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey
Vassar, Larry	Forestry Technician	Eagle River-Florence Ranger	Public notice, mail

		District 4793 Forestry Drive Florence, WI 54121 715-528-4464	survey, field interaction
Veen, Debra	GIS Specialist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Volk, Michelle	Forestry Technician	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Vuchetich, Dan	Forestry Technician	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey, field interaction
Vuchetich, Kim	Office Automation Assistant	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, office interaction
Vuchetich, Paul	Information Receptionist	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Vuchetich, Virginia	Purchasing Agent	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Walker, Curt	Forestry Technician	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Walton, Kyra	NEPA Writer	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey, office interaction
Waupachick, Anthony	Forester	Lakewood-Laona Ranger District 4978 Hwy. 8 W Laona, WI 54541 715-674-4481	Public notice, mail survey
Weinberger, Ken	Heavy Equipment Operator	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Wesner, William	Tractor Operator	Oconto River Seed Orchard 18100 Saul's Spring Road White Lake, WI 54491 715-276-7400	Public notice, mail survey
Wetenkamp, Heather	Forestry Technician	Eagle River-Florence Ranger District 1247 E. Wall St. Eagle River, WI 54521 715-479-2827	Public notice, mail survey
Wiese, Pamela	Agreements Specialist	715-362-1168	Public notice, mail survey
Wilber, Andy	Civil Engineering Technician	715-362-1349	Public notice, mail survey

Wiley, Chuck	Forestry Technician	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Wiley, Debrah A.	Civil Engineering Technician	68 S. Stevens St. Rhinelander, WI 54501 715-362-1300	Public notice, mail survey
Wilson, John	Assistant Ranger, Silviculture	Eagle River-Florence Ranger District 4793 Forestry Drive Florence, WI 54121 715-528-4464	Public notice, mail survey, field interaction
Winstead, Richard	Forest Data Manager	1170 4 <sup>th</sup> Ave. South Park Falls, WI 54552 715-762-2461	Public notice, mail survey, office interaction
Wirsing, Jon	Forestry Technician	Medford-Park Falls Ranger District 1170 4 <sup>th</sup> Ave. S. Park Falls, WI 54552 715-762-2461	Public notice, mail survey
Wirsing, Jon	Forestry Technician	Great Divide Ranger District N22223 Hwy. 13 Glidden, WI 54527 715-264-2511	Public notice, mail survey
Wolfe, Jerry	Forestry Technician	Lakewood-Laona Ranger District 15085 State Rd. 32 Lakewood, WI 54138 715-276-6333	Public notice, mail survey
Worth, Chris	District Ranger	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey, field interaction
Yokishane, Sarah	Forestry Technician	Washburn Ranger District 113 E. Bayfield St. Washburn, WI 54891 715-373-2667	Public notice, mail survey

### List of other Stakeholders Consulted

Name	Organization	Contact information	Contacts
Aderman, D. J.	Johnson Timber Corporation	9676 N. Kruger Road Hayward, WI 54843-7189	Public notice, mail survey
Aguilar, Patricia	Northwoods Forestry, Inc.	PO Box 250 Antigo, WI 54409 715-986-2039	Public notice, mail survey
Alverson, Bill	None given.	430 Lincoln Drive Madison, WI 53706	Public notice, mail survey
Ambrosius, Jim	Ambrosius Forest Products	5103 Hwy 8 and 32 Laona, WI 54541	Public notice, mail survey
Amerall, Jac	None given.	1919 W Rochelle Street Milwaukee, WI 53209	Public notice, mail survey

Anderson, Ken	None given.	Box 294 Eagle River, WI 54521	Public notice, mail survey
Anger, Hans	None given.	95 S State Route 83 Grayslake, IL 60030-1617	Public notice, mail survey
Antigo Public Library, Elcho Branch	Antigo Public Library, Elcho Branch	P.O. Box 800 Elcho, WI 54428	Public notice, mail survey
Arnold, Mary	None given.	295 Cranbrook Court Nekoosa, WI 54457	Public notice, mail survey
Arrowhead Star Co.	Arrowhead Star Co.	14646 Onyx Trail Plainview, AR 72857 501-440-2479	Public notice, mail survey
Ashland Co. Forest Administrator	Wisconsin County Forest Administrators	304 W. Michigan Street P.O. Box 155 Butternut, WI 54514 715-769-3777 <a href="mailto:choffman05@centurytel.net">choffman05@centurytel.net</a>	Public notice, mail survey
Ashland Construction Co.	Ashland Construction Co.	1721 3 <sup>rd</sup> Street West PO Box 231 Ashland, WI 54806 715-682-4884	Public notice, mail survey
Attig, John	Wisconsin Geological & Natural History Survey	3817 Mineral Point Rd. Madison, WI 53705	Public notice, mail survey
Atwood, Edwin	None given.	<a href="mailto:ekatwood@verizon.net">ekatwood@verizon.net</a>	E-mail inquiry
Aulik, Jerry	None given.	N5476 Hwy. 45 Deerbrook, WI 54424	Public notice, mail survey
B & B Logging	B & B Logging	48356 State Highway 13 Ashland, WI 54806	Public notice, mail survey
Bacco Construction Co.	Bacco Construction Co.	PO Box 458 Iron Mountain, MI 49801 906-774-2616	Public notice, mail survey
Bad River Public Library	Bad River Public Library	P.O. Box 39 Odanah, WI 54861	Public notice, mail survey
Bajczyk, Jeffrey	None given.	428 Clover Ct. Dousman, WI 53118	Public notice, mail survey
Barden, Al	SFI Affiliation	4427 Chain O'Lakes Road Eagle River, WI 54521	Public notice, mail survey
Bartels, Adriane	None given.	PO Box 5 Lakewood, WI 54138	Public notice, mail survey
Bartels, Donald	None given.	17067 Clubhouse Lane Lakewood, WI 54138	Public notice, mail survey
Bartelt, Otto	None given.	N2688 North Korth Lane Lot 573 Clintonville, WI 54929	Public notice, mail survey
Bartelt, Pete	None given.	<a href="mailto:pcforest@co.price.wi.us">pcforest@co.price.wi.us</a>	E-mail inquiry
Bartz, David	None given	326 N. Fullerton Ave. Sturgeon Bay, WI 54235	Public notice, mail survey
Baumann, Rebecca 1 Point Place,	Wis. Land & Water Conservation Association	Suite 101 Madison, WI 53719-2809	Public notice, mail survey

Bayfield County Forest Administrator	Wisconsin County Forest Administrators	P.O. Box 445 Washburn, WI 54891 715-373-6114 <a href="mailto:forestry@bayfieldcounty.org">forestry@bayfieldcounty.org</a>	Public notice, mail survey
Behrmann, Jacqueline	Town of Long Lake	Box 108 Long Lake, WI 54542	Public notice, mail survey
Bemidji Public Library	Bemidji Public Library	509 America Avenue Bemidji, MN 56601	Public notice, mail survey
Bennett, Wayne	None given.	15711 E Chain Lake Drive Lakewood, WI 54138	Public notice, mail survey
Bergin, Ron	CAMBA	PO Box 280 Cable, WI 54821	Public notice, mail survey
Biewer Wisconsin Sawmill,	Biewer Wisconsin Sawmill,	400 Red Pine Court Prentice, WI 54556	Public notice, mail survey
Bisonette, Brian	Natural Resource Director, Lac Courte Oreilles Band of Lake Superior Chippewa Indians	13394 W. Trepania Rd., Bldg 1 Hayward, WI 54843-2186 715-634-8934	Public notice, mail survey
Blomberg, Randy	Blomberg Logging Inc.	W3907 State Hwy 86 Ogema, WI 54459	Public notice, mail survey
Boll, Jim	None given.	W869 Van Alstine Road White Lake, WI 54491	Public notice, mail survey
Bondioli, Joe	Contractor	W7254 Altman Rd Park Falls, WI 54552 715-762-3452	Public notice, mail survey
Boren, Steve	None given.	HC 2 Box 1031 Florence, WI 54121	Public notice, mail survey
Boren, Stuart	Wisconsin DNR	<a href="mailto:stuart.boren@dnr.state.wi.us">stuart.boren@dnr.state.wi.us</a>	E-mail inquiry
Boucher, Carla	None given.	115 Clover Dr Chesapeake, VA 23320-5405	Public notice, mail survey
Bozek, Nancy	Wis. Woodland Owners Association	P.O. Box 285 Stevens Point, WI 54481	Public notice, mail survey
Brandes, Charles	None given.	6321 38th Avenue Kenosha, WI 53142	Public notice, mail survey
Bresette, Lisa	THPO, Red Cliff Band of Lake Superior Chippewa	88385 Pike Road, Highway 13 Bayfield, WI 54814 715-779-3648	Public notice, mail survey
Breske, Roger	None given.	Room 310 South PO Box 7882 Madison, WI 53707	Public notice, mail survey
Brevak, Bob	None given.	Route 4 Box 302 Ashland, WI 54806	Public notice, mail survey
Brown, Dennis	Brown Trucking	7920 Trout Creek Road Rhineland, WI 54501	Public notice, mail survey
Brown, Jeff	None given.	18330 130 Ave. Chippewa Falls, WI 54729	Public notice, mail survey
Brown, Susanne	Sylvania Forest Consultants	E8024 Sanders Road Bessemer, MI 49911-970 906-663-6854	Public notice, mail survey
Bschor, Dennis	USDA Forest Service	USDA Forest Service <a href="mailto:dbschor@fs.fed.us">dbschor@fs.fed.us</a>	E-mail inquiry

Bube, Jon	None given.	W3661 Trout Ave. Rib Lake, WI 54470	Public notice, mail survey
Burmeister, Aaron	Burmeister Logging	N6760 French Road Seymour, WI 54165	Public notice, mail survey
Burnett Co. Forest Administrator	Wisconsin County Forest Administrators	7425 County Road K Siren, WI 54872 715-349-2157 <a href="mailto:jnichols@sirentel.net">mailto:jnichols@sirentel.net</a>	Public notice, mail survey
Cable Natural History Museum	Cable Natural History Museum	PO Box 616 Cable, WI 54821	Public notice, mail survey
Caputo, Joseph	Big Game Study Committee	6320 Sighting Rd. McFarland, WI 53558	Public notice, mail survey
Carlson, Larry	Columbia Forest Products	606 Wilderness Drive Mellen, WI 54546	Public notice, mail survey
Carroll, Storm	None given.	5216 Forest Rd. Laona, WI 54541	Public notice, mail survey
Central Timber, Inc.	Central Timber, Inc.	PO Box 2221 Eagle River, WI 54521	Public notice, mail survey
Cerkas, John	None given.	PO Box 344 Laona, WI 54541	Public notice, mail survey
Chippewa Co. Forest Administrator	Wisconsin County Forest Administrators	711 North Bridge Street Chippewa Falls, WI 54729 715-726-7881 <a href="mailto:drichards@co.chippewa.wi.us">drichards@co.chippewa.wi.us</a>	Public notice, mail survey
Clark Co. Forest Administrator	Wisconsin County Forest Administrators	517 Court Street Neillsville, WI 54456 715-743-5140 <a href="mailto:mark.heil@co.clark.wi.us">mark.heil@co.clark.wi.us</a>	Public notice, mail survey
Coffey, Michael B.	None given.	24068 Beartooth Lane Mass City, MI 49948 906-883-3661	Public notice, mail survey
Connor, Dick	None given.	PO Box 95 Laona, WI 54541	Public notice, mail survey
Connor, Gordon	None given.	Box 35 Laona, WI 54541 <a href="mailto:connormgt@aol.com">connormgt@aol.com</a>	Public notice, mail survey, e-mail inquiry
Connor, Jr., Richard	None given.	PO Box 139 Long Lake, WI 54542	Public notice, mail survey
Connor, Richard	None given	PO Box 130 Goodman, WI 54125	Public notice, mail survey
Coutu, Pete	Plum Creek Timber	1411 North 4 <sup>th</sup> Street, Ste. 104 Tomahawk, WI 54487-2154	Public notice, mail survey
Cox, Douglas	Environmental Specialist, Menominee Indian Tribe of Wisconsin	PO Box 910 Keshena, WI 54135 715-799-4937	Public notice, mail survey
Crandon Public Library	Crandon Public Library	110 W. Polk Street Crandon, WI 54520	Public notice, mail survey
Cravens, Jay	None given.	2732 N. Shepard Ave. Milwaukee, WI 53211	Public notice, mail survey

Crawford, Lee	International Paper Company	P.O. Box 274 Norway, MI 49870	Public notice, mail survey
Culhane, Ed	None given.	PO Box 59 Appleton, WI 54912	Public notice, mail survey
Cutting Edge Forestry, Inc.	Cutting Edge Forestry, Inc.	PO Box 300 Talent, OR 97540 541-535-4878	Public notice, mail survey
Dahlie, Gordon	None given.	445 South Lake Avenue Phillips, WI 54555	Public notice, mail survey
Dallman, Matt	The Nature Conservancy	707 Main Street West Ashland, WI 54806	Public notice, mail survey
Dally, Chad	Daily Press	Ashland, WI Chad.dally@mx3.com	Public notice, stakeholder meeting
Danielsen, Karen	Forest Ecologist/Botanist, Great Lakes Indian Fish and Wildlife Commission	PO Box 9, Maple Lane Odanah, WI 54861 715-682-6619, ext. 125	Public notice, mail survey, telephone interview
Darton, Glen	None given.	W336 N6511 Lakeview Drive Oconomowoc, WI 53066	Public notice, mail survey
Dashner, Ralph	Environmental Specialist, Bad River Band of Lake Superior Chippewa Indians	PO Box 39, 100 Maple Lane Odanah, WI 54861 715-682-7123	Public notice, mail survey
Dassow, Bruce	None given.	N5116 Wellington Lake Drive Medford, WI 54451	Public notice, mail survey
Dassow, Harold, Jr.	None given.	W5256 Dassow Ave. Medford, WI 54451	Public notice, mail survey
Davis, Dr. Margaret B	Ecology Evolution and Behavior, U of Minn.	1987 Upper Buford Circle St. Paul, MN 55108	Public notice, mail survey
Decker, Jim	None given.	jdecker@wccbi.org	E-mail inquiry
Degan, Rick	Nicolet Hardwoods	Box 305 Laona, WI 54541	Public notice, mail survey
DeLano, Bud	International Paper Company	P.O. Box 274 Norway, MI 49870 bud.delano@ipaper.com	Public notice, mail survey, e-mail inquiry
DeLong, Paul	None given	101 S. Webster St., PO Box 7921 Madison, WI 53701	Public notice, mail survey
Deml, Mark	None given.	N3525 River Dr. Medford, WI 54451	Public notice, mail survey
Denhardt, Kris	Northwest Hardwoods, Inc.	461 South Linden Street Dorchester, WI 54425	Public notice, mail survey
Dercks, Dan	None given.	712 Sunrise Street Green Bay, WI 54301	Public notice, mail survey
Dodge, Mark	None given.	717 Ridge Road Stevens Point, WI 54481	Public notice, mail survey
Donnay, Jacob S.	Observer-Pinchot Institute for Conservation	jdonnay@pinchot.org	Public notice, opening meeting, closing meeting

Douglas Co. Forestry	Wisconsin County Forest Administrators	P.O. Box 211 Solon Springs, WI 54873 715-378-2219 <a href="mailto:dougctyforestrec@centurytel.net">dougctyforestrec@centurytel.net</a>	Public notice, mail survey
Duffek Sand & Gravel, Inc.	Duffek Sand & Gravel, Inc.	908 Hickory St. PO Box 190 Antigo, WI 54409 715-623-7616	Public notice, mail survey
Dunn, J.D.	Dunn Forestry Services	119 Memory Lane Crystal Falls, MI 49920 906-875-4605	Public notice, mail survey
Dusek, Frank	Price Co. Snowmobile Assn.	815 Pine Crest Ave. Phillips, WI 54555	Public notice, mail survey
E. Larson Co.	E. Larson Co.	W14359 Lloyd Creek Rd. Gleason, WI 54435 715-627-7050	Public notice, mail survey
Eau Claire Co. Forest Administrator	Wisconsin County Forest Administrators	227 First Street West Altoona, WI 54720 715-839-4783 <a href="mailto:John.Staszczuk@co.eau-claire.wi.us">John.Staszczuk@co.eau-claire.wi.us</a>	Public notice, mail survey
Eckstein, Ron	None given.	107 Sutliff Ave. Rhineland, WI 54501	Public notice, mail survey
Eisele, Tim	None given.	129 South Segoe Road Madison, WI 53705	Public notice, mail survey
Ekholm, Pam	Archive Assistant, Wisconsin Historical Society	Northern Great Lakes Visitor Center Ashland, WI 54806 715-685-9983	Office interaction
Elverson, Alan D	None given.	2122 Strong Road Phelps, WI 54554	Public notice, mail survey
Emery, Elmer Jay	St. Croix Band of Chippewa	PO Box 287 Hertel, WI 54845	Public notice, mail survey
Epstein, Eric	None given.	Box 7921 Madison, WI 53707	Public notice, mail survey
Erdman, Thomas	None given.	2420 Nicolet Dr. Green Bay, WI 54301	Public notice, mail survey
Erdmann, Doug	None given.	2418 Woodview Lane Marinette, WI 54143	Public notice, mail survey
Erickson, Dean	None given.	HC 2 Box 234 Florence, WI 54121	Public notice, mail survey
Erlandson, Dale	None given.	PO Box 2 Antigo, WI 54409	Public notice, mail survey
Esser, James	None given.	3012 Thinnes Street Cross Plains, WI 53528	Public notice, mail survey
Executive Director	Wisconsin County Forest Administrators	518 West Somo Avenue Tomahawk, WI 54487 715-453-6741 <a href="mailto:wcf@mac.com">wcf@mac.com</a>	Public notice, mail survey
Express Forestry, Inc.	Express Forestry, Inc.	1231 Hwy 254 West Leslie, AR 72645 501-745-8484	Public notice, mail survey

Falck, Dennis	None given.	8832 North Port Washington Street Milwaukee, WI 53217-1628	Public notice, mail survey
Faust, Randy	None given.	15684 Davis Rd Mountain, WI 54149	Public notice, mail survey
Fechner, Jeff	Webster Hardwoods	Box 297 Bangor, WI 54614-0297	Public notice, mail survey
Ferdinand, Roman	Hydrogeologist, Sokoagon Chippewa Community, Mole Lake Chippewa Tribe	3051 Sand Lake Road Crandon, WI 54520 715-478-7611	Public notice, mail survey
Finnell, Joanne	None given.	10004 State Highway 22 East Gillett, WI 54124	Public notice, mail survey
Florence Co. Forestry and Parks Administrator	Wisconsin County Forest Administrators	Natural Resources Bldg. 4818 Forestry Drive Florence, WI 54121 715-528-3207 x105 <a href="mailto:psmith@co.florence.wi.us">psmith@co.florence.wi.us</a>	Public notice, mail survey
Forbes, Anne	None given	516 Wingra St. Madison, WI 53714	Public notice, mail survey
Forest Co. Forest Administrator	Wisconsin County Forest Administrators	200 E. Madison Crandon, WI 54520 715-478-3475 <a href="mailto:dzforestco@ez-net.com">dzforestco@ez-net.com</a>	Public notice, mail survey
Forest Lodge Library	Forest Lodge Library	P.O. Box 176 Cable, WI 54821	Public notice, mail survey
Francisco, Gene	Timber Producers Association	3243 Golf Course Road Rhineland, WI 54501-8176	Public notice, mail survey
Frank, Nancy	Ice Age Trail Regional Coordinator	E 3602 1450 <sup>th</sup> Ave. Ridgeland, WI 54763	Public notice, mail survey
Frank, Ted	Ted Frank Const & Trucking	9718 Airport Road Crandon, WI 54520	Public notice, mail survey
Franks, Inc.	Franks, Inc.	N2512 County Y Peshtigo, WI 54157	Public notice, mail survey
Frederickson, Ed	None given.	PO Box 1603 (mailing) or 1509 Sage Rd. (physical) Medford, OR 97501 530-949-4734	Public notice, mail survey
Fries, Mark	Stora Enso North America	P.O. Box 8050 Wisconsin Rapids, WI 54495-8050	Public notice, mail survey
Friske, Donald	None given.	Room 312 North State Capitol P.O. Box 8952 Madison, WI 53708	Public notice, mail survey
Friske, Representative Donald	Wisconsin State Representative	P.O. Box 8952 Madison, WI 53708	Public notice, mail survey
Funk, Shari	None given.	PO Box 340 Crandon, WI 54520	Public notice, mail survey
Futurewood Corporation	Futurewood Corporation	9676 N Kruger Rd Hayward, WI 54843	Public notice, mail survey

Fyock, Joel D.	Chestnut Ridge Forestry	PO Box 602 Cloudcroft, NM 88317 505-687-4458	Public notice, mail survey
Galinski, Terri	Plum Creek Timber	1411 North 4 <sup>th</sup> Street, Ste. 104 Tomahawk, WI 54487-2154	Public notice, mail survey
Gaskill, Sharon Clark	None given.	10405 Bell Rd. Black Earth, WI 53515	Public notice, mail survey
Gayhart, Elmer	None given.	N2275 Cardinal Road Medford, WI 54451	Public notice, mail survey
Gebken, Duwayne	None given.	PO Box 7921 Madison, WI 53707	Public notice, mail survey
Gehrke, Don	None given.	20800 George Hunt Circle Waukesha, WI 53186	Public notice, mail survey
Genich, Kim	None given.	2020 University Avenue #31 Madison, WI 53705	Public notice, mail survey
Geske, Milton	None given.	105 North Wildwood Dr Crandon, WI 54520	Public notice, mail survey
Giese, Roger	Midwest Forest Products	General Delivery Lakewood, WI 54138	Public notice, mail survey
Gilbert, John	Biologist, Great Lakes Indian Fish and Wildlife Commission	PO Box 9, Maple Lane Odanah, WI 54861 715-682-6619, ext. 121 jgilbert@glifwc.org	Public notice, mail survey, e-mail contact, telephone interviews (2)
Gilbert, Tom	National Park Service	700 Ray O Vac Dr. Madison, WI 53711	Public notice, mail survey
Gilson-Pierce, Gail	Trees for Tomorrow	P.O. Box 609 Eagle River, WI 54521-0609	Public notice, mail survey
Gipp, Frank and Joan	None given.	403 Buchanan Road Kaukauna, WI 54130	Public notice, mail survey
Glime, Michael	None given.	HC 1 Box 182 Florence, WI 54121	Public notice, mail survey
Glynn, Brian	None given.	4141 Sleeping Dragon Road West Bend, WI 53095	Public notice, mail survey
Gorski, Justin	None given.	Box 507 Pewaukee, WI 53072	Public notice, mail survey
Govett, Robert	University of Wisconsin, Stevens Point	CNR – Wood Utilization Lab Stevens Point, WI 54481	Public notice, mail survey
Graunke, Gerald	None given.	17 South Watertown Street Waupun, WI 53963	Public notice, mail survey
Greiff, Elizabeth	Program Director, St. Croix Chippewa Indians of Wisconsin	246663 Angeline Ave. Webster, WI 54893-9246 715-349-2195	Public notice, mail survey
Grewe, Dave	Wisconsin Bearhunters Association	5705 County Road F Abbotsford, WI 54405	Public notice, mail survey
Grieser, Robert	None given.	200 N Grand Avenue Rothschild, WI 54474	Public notice, mail survey
Grignon, David	THPO, Menominee Indian Tribe of Wisconsin	PO Box 910 Keshena, WI 54135 715-799-5258	Public notice, mail survey, telephone inquiry

Grinyer, Michael R.	Grinyer Forestry Consulting	1636B River Road St. Croix Falls, WI 54024 715-483-1328	Public notice, mail survey
Grunwald, John	None given.	812-9-88 2832 , <a href="mailto:johngrunwald@aol.com">johngrunwald@aol.com</a>	E-mail inquiry
Gumz, Brad	None given.	W9404 County Road D Westboro, WI 54490	Public notice, mail survey
Gunderson, Ernest	None given.	3324 33rd Ave South Minneapolis, MN 55406	Public notice, mail survey
Gunnulson, David	None given.	1813 Hillside Road Cambridge, WI 53523	Public notice, mail survey
Gurnoe, Michelle	Fisheries Office Manager, Red Cliff Band of Lake Superior Chippewa	88385 Pike Road, Hwy 13 Bayfield, WI 54814 715-779-3750	Public notice, mail survey
Gustafson, Earl	None given.	Box 718 Neenah, WI 54957	Public notice, mail survey
Haasl, Charlie	None given.	7730 Meadowlark Lane Wisconsin Rapids, WI 54494	Public notice, mail survey
Hakes, David	David Hakes Logging, LLC	1400 S. 3rd Street Cornell, WI 54732	Public notice, mail survey
Halada, Stewart	None given.	871 State Highway 139 Tipler, WI 54542	Public notice, mail survey
Halpin, Gary	Meister Log & Lumber	P.O. Box 308 Reedsburg, WI 53959	Public notice, mail survey
Hamann, Wayne	Wis. Professional Loggers Association	W4328 County Hwy M Medford, WI 54451	Public notice, mail survey
Hamilton, Jack A.	None given.	100 Wisconsin River Drive Port Edwards, WI 54469	Public notice, mail survey
Haney, Alan	University of Wisconsin, Steven's Point, College of Natural Resources	2100 Main St. Stevens Point, WI 54481	Public notice, mail survey
Hannigan, Bill	None given.	PO Box 117 Ishpeming, MI 49849	Public notice, mail survey
Hanninen, Jr., Charles	None given..	Route 1 Box 306 Highbridge, WI 54846	Public notice, mail survey
Hanson, Drew	Ice Age Park and Trail Foundation	2453 Atwood Ave., Ste 206 Madison, WI 53704	Public notice, mail survey
Hanson, Martin	None given.	Box 707 Mellen, WI 54546	Public notice, mail survey
Hanson, Paul	Plum Creek Timber	15954 Rivers Edge Drive, Ste. 101 Hayward, WI 54843	Public notice, mail survey
Harbin, Chris	None given.	1057 Reason Ave Louisville, KY 40217	Public notice, mail survey
Harden, Randy	Wisconsin ATV Assn.	4420 N. 50 <sup>th</sup> St. Sheboygan, WI 53083	Public notice, mail survey
Hargrove, Ross C.	None given.	80 South Eighth Street 1000 IDS Center Minneapolis, MN 55402	Public notice, mail survey

Harms, Jan	University of Wisconsin, Steven's Point	378 CNR Stevens Point, WI 54481	Public notice, mail survey
Harratt, Dana	Mosinee Paper	100 Main Street Mosinee, WI 54455	Public notice, mail survey
Harris, Trent	None given.	721 West Maple Street Medford, WI 54451	Public notice, mail survey
Havel, Janes	None given.	N8002 Willow Drive Algoma, WI 54201	Public notice, mail survey
Haveri, Rose	Tourist Information Assistant, Wisconsin Historical Society	Northern Great Lakes Visitor Center Ashland, WI 54608	Office interaction
Hayward Carnegie Library	Hayward Carnegie Library	P.O. Box 917 Hayward, WI 54843	Public notice, mail survey
Hedstrom Lumber Company Inc	Hedstrom Lumber Company, Inc.	1504 Gunflint Trail Grand Marais, MN 55604	Public notice, mail survey
Hegge, Brian	Trout Unlimited	2898 Oak Ridge Circle Rhineland, WI 54501 715-362-3244	Public notice, mail survey
Heidemann, Pete	None given.	PO Box 228 Ewen, MI 49925 906-988-2233	Public notice, mail survey
Henricks, Scott	Trout Unlimited	212 Mary St. Antigo, WI 54409 715-623-3867	Public notice, mail survey
Herzberg, Jerry	None given.	10240 Young Street Wisconsin Rapids, WI 54494	Public notice, mail survey
Hiemenz, Richard	USDA Forest Service	rhiemenz@fs.fed.us	E-mail inquiry
Hilberg Logging	Hilberg Logging	824 Erie Avenue Crystal Falls, MI 49920	Public notice, mail survey
Hilgers, Pete	Kretz Lumber Co.	Box 160 Antigo, WI 54409	Public notice, mail survey
Hokans, Rick	Observer-USDA Forest Service	rhoskins@fs.fed.us	Public notice, opening meeting, stakeholder meeting, closing meeting
Homeier, Brad	NewPage Corporation	P.O. Box 1008 Escanaba, MI 49829-6008	Public notice, mail survey
Hoppe, Dan and Deb	None given.	305 E. Ducharm St. Kaukauna, WI 54130	Public notice, mail survey
Hoppe, Jim	Packaging Corporation of America	N9090 County Road E Tomahawk, WI 54487	Public notice, mail survey
Horvath, William	Natl. Assoc. of Conservation Districts	350 McDill Avenue Stevens Point, WI 54481-2895	Public notice, mail survey
Hoselton, Lynn	None given.	437 Gillett St Waukegan, IL 60085	Public notice, mail survey
Howe, Dr. Robert	None given.	MAC 212 UW Green Bay Green Bay, WI 54311	Public notice, mail survey
Huebner, George	None given.	Route 1 Box 846 Crandon, WI 54520	Public notice, mail survey
Huempfer, Mark	Wild Rivers	<a href="mailto:wildrivers@centurytel.net">wildrivers@centurytel.net</a>	E-mail inquiry

Huizdak, David	USDA NRCS	Room 103 Spoooner, WI 54801 715-635-3505, ext. 117	Public notice, mail survey
Hulbert, William	None given.	118 Avery Avenue Park Falls, WI 54552 715-762-2204 715-762-1411	Public notice, mail survey
Hylla, Nicholas J.	Wis. Forest Resources Education Alliance	2040 Center Street Stevens Point, WI 54481	Public notice, mail survey
Iola Village Library	Iola Village Library	180 South Main Street Iola, WI 54945	Public notice, mail survey
Iron Co. Forest Administrator	Wisconsin County Forest Administrators	607 Third Ave. N. Suite #2 Hurley, WI 54534 715-561-2697 <a href="mailto:brown@up.lib.mi.us">brown@up.lib.mi.us</a>	Public notice, mail survey
Isham, Mic	Vice Chair - Voigt Intertribal Task Force, Chair - Board of Comm. for GLIFWC, Lac Courte Oreilles Band of Lake Superior Chippewa Indians	13394 W. Trepania Rd., Bldg 1 Hayward, WI 54843-218 715-634-8934	Public notice, mail survey
Jackson Co. Forest Administrator	Wisconsin County Forest Administrators	W7970 Airport Road Black River Falls, WI 54615 715-284-8475 <a href="mailto:jim.zahasky@centurytel.net">jim.zahasky@centurytel.net</a>	Public notice, mail survey
Jackson-Golly, Kelly	THPO, Lac du Flambeau Band of Lake Superior Chippewa Indians	PO Box 67, 418 Little Pines Road Lac du Flambeau, WI 54538 715-588-2139	Public notice, mail survey, telephone interview
Jacobs, Tom	SFI/BMP Manager Louisiana-Pacific Corporation	N3312 River Bend Drive Peshtigo, WI 54157	Public notice, mail survey
Jacobson, Kent	None given.	PO Box 504 Cloquet, MN 55720-1566	Public notice, mail survey
Janecek, Tony	None given.	206 Wallrich Rd. Cecil, WI 54111	Public notice, mail survey
Jarvinen, Brian	H&J Forest Services	PO Box 255 Manistee, MI 49660 231-590-9198	Public notice, mail survey
Joanis, Bruce	None given.	209 13th Avenue. East Ashland, WI 54806	Public notice, mail survey
Jockisch, Robert	RJ Distributing, Inc.	3605 N Parish Ave Peoria, IL 61604	Public notice, mail survey
Johnson Timber Corp.	Johnson Timber Corp.	9676 Kruger Rd. Hayward, WI 54843	Public notice, mail survey
Johnson, Bill	Johnson Timber Corporation	9676 N. Kruger Road Hayward, WI 54843-7189	Public notice, mail survey
Jordan, Carl	SAPPI Fine Paper-Wood Procurement	98 North Avenue, Suite 30 Skowhegan, ME 04976	Public notice, mail survey

Juneau Co. Forest Administrator	Wisconsin County Forest Administrators	650 Prairie Mauston, WI 53948-1345 608-847-9390 <a href="mailto:pfadm@co.juneau.wi.us">pfadm@co.juneau.wi.us</a>	Public notice, mail survey
K.L.P. Logging	K.L.P. Logging	5791 Hwy. 8 Laona, WI 54541	Public notice, mail survey
Kafka, Pat	None given.	1940 River Vista Drive Mosinee, WI 54455	Public notice, mail survey
Kagan, Neil	Great Lakes Natural Resource Center	506 East Liberty Ann Arbor, MI 48104	Public notice, mail survey
Kalmon, Steve	Mondeaux Dam Lodge Concessions	1117 South 8 <sup>th</sup> St. Medford, WI 54451	Public notice, mail survey
Kariainen, Steve	Louisiana-Pacific Corporation	16571 W. US Hwy 63 Hayward, WI 54843	Public notice, mail survey
Kelley, Ed	None given.	PO Box 233 Florence, WI 54121	Public notice, mail survey
Kelly, Rick	Manager, National Park Service	Northern Great Lakes Visitor Center Ashland, WI 54806 715-685-9983	Office interaction
Kinney, Phillip	None given.	308 Elm Street Menasha, WI 54952-3406	Public notice, mail survey
Kirchmeyer, Richard	None given.	N4824 Lound Rd. Prentice, WI 54556	Public notice, mail survey
Kizewski, Jim	None given.	8941 Bainbridge Trail Wisconsin Rapids, WI 54494	Public notice, mail survey
Klessig Family Partnership	Klessig Family Partnership	Box 342 Eagle River, WI 54521	Public notice, mail survey
Koepp, Paul	None given.	HC 1 Box 23a Florence, WI 54121	Public notice, mail survey
Kohl, Honorable Herb	U.S. Senator	330 Senate Hart Office B Washington, DC 20510	Public notice, mail survey
Konieczny, Dave	Taylor Made ATV'ers	328 South 3 <sup>rd</sup> Medford, WI 54451	Public notice, mail survey
Korbus, Edmund	None given.	RR 1 Wabeno, WI 54566	Public notice, mail survey
Korzeniewski, Ronald	None given.	9460 Schroeder Road Krakow, WI 54137-9707	Public notice, mail survey
Kovach, Joseph	None given.	715 East 11th Street Ashland, WI 54806	Public notice, mail survey
Kramer, Kevin	KLP Logging	5791 Hwy 8 Laona, WI 54541 715-674-2246	Public notice, mail survey
Krause, Eugene	Town of Spider Lake	RR 7 Box 7579 Hayward, WI 54843	Public notice, mail survey
Kreiling, Pete	Georgia-Pacific Corporation	P.O. Box 138 Phillips, WI 54555	Public notice, mail survey
Krenz, Willie	None given.	110 Joan Street Medford, WI 54451	Public notice, mail survey
Kretz, Dan	Kretz Lumber Company	P.O. Box 160 Antigo, WI 54409	Public notice, mail survey

Krueger & Steinfest, Inc.	Krueger & Steinfest, Inc.	PO Box 159 Antigo, WI 54409 715-627-7020	Public notice, mail survey
Krueger, Kurt	Vilas County News Review	Box 1929 Eagle River, WI 54521	Public notice, mail survey
Krznasich, Larry	None given.	N15620 Sugarbush Road Park Falls, WI 54552	Public notice, mail survey
Kudick, Rob	Wausau Paper	100 Main Street Mosinee, WI 54455-1497	Public notice, mail survey
Kuhman, Gary	None given.	N5750 Lound Road Prentice, WI 54556	Public notice, mail survey
Kurilla, Donna	Executive Director, Friends of the Center	Northern Great Lakes visitor Center Ashland, WI 54608	Office interaction
Labine, Wayne	Voigt Task Force Rep, Sokoagon Chippewa Community, Mole Lake Chippewa Tribe	3051 Sand Lake Road Crandon, WI 54520 715 478-7530	Public notice, mail survey
Lafermier, Leo	None given.	PO Box 529 Bayfield, WI 54814	Public notice, mail survey
Lamy, Jon	Louisiana-Pacific Corporation	P.O. Box 100 Sagola, MI 49881	Public notice, mail survey
Lange, Dale	Trout Unlimited	N2095 County BB Marinette, WI 54143 715-582-1135	Public notice, mail survey
Lange, William	None given.	Route 2 Box 1228 Argonne, WI 54511	Public notice, mail survey
Langlade Co. Forest Administrator	Wisconsin County Forest Administrators	1633 Neva Road Antigo, WI 54409 715-627-6300 <a href="mailto:sjackson@co.langlade.wi.us">sjackson@co.langlade.wi.us</a>	Public notice, mail survey
Lee, David	Lionite Hardboard	PO Box 138 Phillips, WI 54555	Public notice, mail survey
Leffler, Richard	Florence Cty Hwy. Dept.	HC 3 Box 1 Florence, WI 54121	Public notice, mail survey
Leoso, Edith	THPO, Bad River Band of Lake Superior Chippewa Indians	PO Box 39 Odanah, WI 54861 715-682-7123 x1662	Public notice, mail survey
Levantez, Nancy	None given.	3955 Velvet Lake Road Rhineland, WI 54501	Public notice, mail survey
Lochner, Anne Marie	Thilmany LLC	P.O. Box 600 Kaukauna, WI 54130	Public notice, mail survey
Lochner, Brian	Georgia-Pacific Corporation	1220 West Railroad Street Duluth, MN 55802	Public notice, mail survey
Loden, Connie	None given.	1120 Lincoln Street Wisconsin Rapids, WI 54494	Public notice, mail survey
Longtin, Glen	None given.	29507 Longtin Road Ewen, MI 49925 906-575-3916	Public notice, mail survey
Louisiana Pacific Corporation	Louisiana Pacific Corporation	PO Box 100 Sagola, MI 49881	Public notice, mail survey

Lovlien, Thomas G.	Marathon Co. Forest Administrator	Forestry Department 212 River Drive, Suite 2 Wausau, WI 54403-5476 715-261-1584 <a href="mailto:tglovlien@mail.co.marathon.wi.us">tglovlien@mail.co.marathon.wi.us</a>	Public notice, mail survey, e-mail inquiry
Lowe, Jo Deen B.	Deputy Attorney General, Forest County Potawatomi Community	P.O. Box 340 Crandon, WI 54520 715-478-7258	Public notice, mail survey
Lukas, Andy	None given.	PO Box 197 Laona, WI 54541	Public notice, mail survey
Lundberg, Bill	Marion Plywood	P.O. Box 497 Marion, WI 54950	Public notice, mail survey
MacCleery, Doug	Observer-USDA Forest Service	dmaccleery@fs.fed.us	Public notice, opening meeting, stakeholder meeting, closing meeting
Mahoney, Mike	None given.	814 Carrington Avenue South Milwaukee, WI 53172	Public notice, mail survey
Majewski, David	None given.	HC 1, Box 82 Florence, WI 54121	Public notice, mail survey
Major, Nancy	Superior Forestry Services	4572 Evergreen Drive Land O' Lakes, WI 5454 715-547-3157	Public notice, mail survey
Marble, Jenie	None given.	HC 1 Box 398 B Fence, WI 54120	Public notice, mail survey
Marinette Co. Forest Administrator	Wisconsin County Forest Administrators	1926 Hall Ave. Marinette, WI 54143 715-732-7525 <a href="mailto:jneilio@marinettecounty.com">jneilio@marinettecounty.com</a>	Public notice, mail survey
Markart, Ken	None given.	107 Sutliff Ave Rhineland, WI 54501	Public notice, mail survey
Marquardt, Amy	Forest Industry Safety & Training Alliance	3243 Golf Course Road Rhineland, WI 54501	Public notice, mail survey
Martin, Giiwegiizhigookway	THPO, Lac Vieux Desert Band of Lake Superior Chippewa Indians, Ketegitigaaning Ojibwe Nation Cultural/ Historic Preservation & Museum	E23857 Poplar Circle Watersmeet, WI 49969 906-358-4577	Public notice, mail survey
Mastelski, Ron	None given.	W12000 Gruchow Lane Waterloo, WI 53594	Public notice, mail survey
Matthews, Colette	Wis. County Forest Association	W7300 Ridge Road Tomahawk, WI 54487	Public notice, mail survey
Mayward, Krueger	None given.	W5132 Joe Snow Road Merrill, WI 54452	Public notice, mail survey
McCoy, Todd	None given.	1329 Cherry Street Green Bay, WI 54301	Public notice, mail survey
McCaslin Logging	McCaslin Logging	17152 Rudy Road Townsend, WI 54175	Public notice, mail survey

McConnell, Brett	Environmental Specialist, Lac Courte Oreilles Band of Lake Superior Chippewa Indians	13394 W. Trepania Rd., Bldg 1 Hayward, WI 54843-2186 715-634-0102	Public notice, mail survey
McConnell, Robert	WATVA	2 Andrew Way Madison, WI 53714	Public notice, mail survey
McDougal, Scott	Tribal Forester, Lac du Flambeau Band of Lake Superior Chippewa Indians	PO Box 67, 418 Little Pines Road Lac du Flambeau, WI 54538 715-588-9165	Public notice, mail survey
McElroy, Spencer	None given	HC 1, Box 164 Florence, WI 54121	Public notice, mail survey
McGinnis, Mary Jo	Cedar Ridge Forestry Inc.	15835 Hatchery Road Pelkie, MI 49958 906-334-2735	Public notice, mail survey
McIntyre, Ken	SAPPI Fine Paper	18909 69 <sup>th</sup> Avenue Chippewa Falls, WI 54729	Public notice, mail survey
McKee, Randy	Randy McKee Trucking, Inc	701 S. Park Ave Crandon, WI 54520	Public notice, mail survey
McMillan, Katharine	None given.	RR2 Box 21 Kellogg, MN 55945	Public notice, mail survey
McMillin, Tom	None given.	Route 2 Box 21 Kellogg, MN 55945	Public notice, mail survey
McPhetridge, Mary	Ashland Area Chamber of Commerce	PO Box 746 Ashland, WI 54806	Public notice, mail survey
McVoy, Kirk	None given.	1406 W. Skyline Dr. Madison, WI 53705	Public notice, mail survey
Medford Area Chamber of Commerce	Medford Area Chamber of Commerce	104 E. Perkins Medford, WI 54451	Public notice, mail survey
Meeker, James	Northland College	1411 Ellis Ave. Ashland, WI 54806	Public notice, mail survey
Menke, Bill	National Park Service	700 Rayovac Dr., Suite 100 Madison, WI 53711	Public notice, mail survey
Meyer Buzz	High Point Chapter	530 Gibson St. Medford, WI 54451	Public notice, mail survey
Meyer, Bob	Taylor Co. Snowmobile Assn.	W4700 Fawn Ave. Westboro, WI 54490	Public notice, mail survey
Midwest Forest Products	Midwest Forest Products	15954 Rivers Edge Drive Hayward, WI 54843	Public notice, mail survey
Millard Jr., Bob	None given.	13304 South Green Lake Lane Mountain, WI 54542	Public notice, mail survey
Miller, Agnes	None given.	PO Box 16 Long Lake, WI 54542	Public notice, mail survey
Mineau, Louis	None given.	1428 Buffalo Street Green Bay, WI 54313-5712	Public notice, mail survey
Mladenoff, Dave	Department of Forestry, Univ. of Wisconsin	1630 Linden Drive Madison, WI 53706	Public notice, mail survey
Mollen, David	None given.	8589 W State Hwy 70 Saint Germain, WI 54558	Public notice, mail survey

Mongin, Paul	Wisconsin Off-Highway Vehicle Assn., Trout Unlimited	1151 Delray Dr. Green Bay, WI 54304 920-499-7468	Public notice, mail survey
Monroe Co. Forest Administrator	Wisconsin County Forest Administrators	14307 County Hwy. B Box 21A Sparta, WI 54656 608-269-8738 <a href="mailto:wbangsbert@co.monroe.wi.us">wbangsbert@co.monroe.wi.us</a>	Public notice, mail survey
Montano, Melonee	Environmental Programs Manager, Red Cliff Band of Lake Superior Chippewa Indians	88385 Pike Road, Hwy. 13 Bayfield, WI 54814 715-779-3650	Public notice, mail survey
Moore, J Terry	None given.	731 Birch St. Rhineland, WI 54501 <a href="mailto:jtmoore@frontier.net">jtmoore@frontier.net</a>	Public notice, mail survey, e-mail inquiry
Morales, Amy	SAPPI Fine Paper	15386 West Williams Road Hayward, WI 54843	Public notice, mail survey
Mouw, Gordy	Stora Enso North America	P.O. Box 8050 Wisconsin Rapids, WI 54495-8050 <a href="mailto:Gordon.Mouw@storaenso.com">Gordon.Mouw@storaenso.com</a>	Public notice, mail survey, e-mail inquiry
Mrotek, Don	Sawyer Co. Snowmobile and ATV Alliance	224 Kansas Ave. Hayward, WI 54843	Public notice, mail survey
Muller, Susan	Great Lakes Natural Resources	506 E Liberty Ann Arbor, MI 48104-221	Public notice, mail survey
Murn & Martin S.C.	Murn & Martin S.C.	W229N1792 Amber Lane Waukesha, WI 53186	Public notice, mail survey
Murn, Thomas	SAPPI Fine Paper	P.O. Box 504 Cloquet, MN 55720	Public notice, mail survey
Murto, Robert	None given.	Route 1 Box 152 Drummond, WI 54832	Public notice, mail survey
Myere, Bob	None given.	<a href="mailto:indy199961@hotmail.com">indy199961@hotmail.com</a>	E-mail inquiry
Myhre, John	None given.	7595 Pine Point Road Hayward, WI 54843	Public notice, mail survey
Nagel Lumber Company	Nagel Lumber Company	Box 209 Land O'Lakes, WI 54520	Public notice, mail survey
Nedland, Jack	Barron County Forest Administrator	127 South 4th Street Barron, WI 54812 715-537-6295 <a href="mailto:bcforest@chibardum.net">bcforest@chibardum.net</a> <a href="mailto:jack.nedland@co.barron.wi.us">jack.nedland@co.barron.wi.us</a>	Public notice, mail survey, e-mail inquiry
Nemec, Jim	Chequamegon ATV Club	PO Box 67 Ashland, WI 54806	Public notice, mail survey
Noll, Mark	None given.	S1917 Buena Vista Rd. Alma, WI 54610	Public notice, mail survey

Nolta, Tom	T.F.S. (Timberland Forestry Services)	E6971 Wildwood Rd. Munising, MI 49862 906-387-4350 906-250-7197	Public notice, mail survey
North Country Lumber Inc.	North Country Lumber Inc.	PO Box 499 Mellen, WI 54546	Public notice, mail survey
Northwest Hardwoods, Inc.	Northwest Hardwoods, Inc.	PO Box 131 Dorchester, WI 54425	Public notice, mail survey
Northwoods Forestry, Inc.	Northwoods Forestry, Inc.	PO Box 250 Antigo, WI 54409 715-882-5709	Public notice, mail survey
NRG Ducaine Logging, Inc.	NRG Ducaine Logging, Inc.	N8150 Smith Creek Road Crivitz, WI 54114	Public notice, mail survey
Nyberg, Gerald	None given.	910 Dakota Avenue Gladstone, MI 49837 906-428-4389	Public notice, mail survey
Oberstar, David	None given.	700 Lonsdale Bldg. Duluth, MN 55802	Public notice, mail survey
Oconto Co. Forest Administrator	Wisconsin County Forest Administrators	301 Washington Street Oconto, WI 54153 920-834-6827 <a href="mailto:skaliro@co.oconto.wi.us">skaliro@co.oconto.wi.us</a>	Public notice, mail survey
Okraszewski, Jim	NewPage Corporation	906-233-2150 <a href="mailto:jdo@newpagecorp.com">jdo@newpagecorp.com</a>	Public notice, mail survey, stakeholder meeting, telephone contact
Oneida Co. Forest Administrator	Wisconsin County Forest Administrators	Courthouse, P.O. Box 400 Rhineland, WI 54501 715-369-6140 <a href="mailto:jbilogan@co.oneida.wi.us">jbilogan@co.oneida.wi.us</a>	Public notice, mail survey
Oneida County Board	Oneida County Board	PO Box 400 Rhineland, WI 54501	Public notice, mail survey
Page, Henry	None given.	915 Longwood Drive Lake Forest, IL 60045	Public notice, mail survey
Palmetto Forestry Services, LLC	Palmetto Forestry Services, LLC	6416 Thurgood Marshall Hwy. Kingstree, SC 29556 843-382-9524	Public notice, mail survey
Parker, Jeff	None given.	PO Box 313 Brimley, MI 49715	Public notice, mail survey
Paulson, Neil	None given.	PO Box 36 Drummond, WI 54832	Public notice, mail survey
Pecore, Marshal	Forest Manager, Menominee Tribal Enterprises	PO Box 670 Keshena, WI 54135 715-799-3896	Public notice, mail survey
Penegor, John	Penegor Forestry Services	6117 Woodland P.1 Avenue Gladstone, MI 49837 906-235-0053	Public notice, mail survey
Pertile, Erica	None given.	7335 Russell Road Three Lakes, WI 54562 715-546-3108	Public notice, mail survey
Peters, Carl	Carl Peters Timber Products	58560 Argo Rd Mason, WI 54856	Public notice, mail survey

Peters, Paul	Paul Peters Logging	28990 Peters Road Mason, WI 54856	Public notice, mail survey
Peters, Terrence	Peters Logging	Route 1 Box 37 Mellen, WI 54546 <a href="mailto:tlplogging@baysat.net">tlplogging@baysat.net</a>	Public notice, mail survey, e-mail inquiry
Petersen, Lowell	None given.	986 Catfish Lake Road Eagle River, WI 54521 715-479-7289	Public notice, mail survey
Peterson, Rachel	SAPPI Fine Paper	E 6950 Spruce Road Bessemer, MI 49911	Public notice, mail survey
Peterson, Robert	Domtar Industries Inc.	100 Wisconsin River Drive Port Edwards, WI 54469	Public notice, mail survey
Pielsticker, Bill	Trout Unlimited	8045 Crystal Lake Rd. Lodi, WI 53555-9539 608-592-4718	Public notice, mail survey
Pierson, Darrell	Packaging Corporation of America	N9090 County Road E Tomahawk, WI 54487	Public notice, mail survey
Pilch, Laurie	None given.	N9398 Old 13 Rd Phillips, WI 54555	Public notice, mail survey
Pingrey, Paul	Observer-Wis. Department of Natural Resources Forestry Division	P.O. Box 7921 Madison, WI 53707-7921 <a href="mailto:paul.pingrey@dnr.state.wi.us">paul.pingrey@dnr.state.wi.us</a>	Public notice, mail survey, opening meeting, stakeholder meeting, closing meeting
Plunkett, Jeff	Weyerhaeuser Company	200 North Grand Avenue Rothschild, WI 54474-1197	Public notice, mail survey
Polk Co. Forest Administrator	Wisconsin County Forest Administrators	100 Polk County Plaza, Suite 40 Balsam Lake, WI 54810 715-485-9265 <a href="mailto:paulp@co.polk.wi.us">paulp@co.polk.wi.us</a>	Public notice, mail survey
Pope, Russell	None given.	Box 7921 101 South Webster Madison, WI 53707	Public notice, mail survey
Price Co. Forest Administrator	Wisconsin County Forest Administrators	104 South Eyder Avenue Phillips, WI 54555 715-339-6371 <a href="mailto:pcforest@co.price.wi.us">pcforest@co.price.wi.us</a>	Public notice, mail survey
Price Electric Cooperative, Inc.	Price Electric Cooperative, Inc.	PO Box 110 Phillips, WI 54555	Public notice, mail survey
Price, Will	Observer-Pinchot Institute for Conservation	<a href="mailto:willprice@pinchot.org">willprice@pinchot.org</a>	Public notice, opening meeting, stakeholder meeting, closing meeting (by phone)
Professional Tree Forestry Consolidated Services	Professional Tree Forestry Consolidated Services	PO Box 60 Vanceboro, NC 28586-0060 252-244-2258	Public notice, mail survey
Puhl, David	None given.	W7995 Walters Rd. Mauston, WI 53948	Public notice, mail survey
Purtell, Robert F	None given.	3316 W Wisconsin Avenue Milwaukee, WI 53208	Public notice, mail survey
Radlinger, David	David Radlinger Logging	14256 Radlinger Road Butternut, WI 54514	Public notice, mail survey

Read, Terry	UP Forest Resources Co.	129 Bernhardt Road Iron River, MI 49935 906-265-5170	Public notice, mail survey
Reed, Jean	None given.	8038 Ripco Road Eagle River, WI 54521	Public notice, mail survey
Reinhard, Kathy	Price County Tourism	126 Cherry St., Room 9 Phillips, WI 54555	Public notice, mail survey
Retzlaff, Merlin	None given.	4808 Mill Street Laona, WI 54541	Public notice, mail survey
Richard Good Logging	Richard Good Logging	10699 W Twin Bay Road Hayward, WI 54843	Public notice, mail survey
Riegert, Michael J.	None given.	N763 Oriole Drive Stetsonville, WI 54480	Public notice, mail survey
Riley, Andrew	Tree Tech	N10122 County Rd. F Phillips, WI 54555 715-339-4074	Public notice, mail survey
Ringer Bulldozing, Incorp.	Ringer Bulldozing, Incorp.	N544 Cty G Sheldon, WI 54766	Public notice, mail survey
RJY Services, Inc.	RJY Services, Inc.	1363 Kassuba Rd. PO Box 1786 Gaylord, MI 49735 989-732-7092	Public notice, mail survey
Robers, Charles	The Hunt Club	6115 McHenry Burlington, WI 53105	Public notice, mail survey
Roberts, Bill	Northwoods Land Management	P.O. Box 195 Bessemer, MI 49911 906-663-6826	Public notice, mail survey
Rodd, Jim	Domtar Industries Inc.	100 Wisconsin River Drive Port Edwards, WI 54469	Public notice, mail survey
Rogers, Elizabeth	Forest County Potawatomi Community	P.O. Box 340 Crandon, WI 54520 715-478-2903	Public notice, mail survey
Roiger, Michael	None given.	N5085 Bens Lane Medford, WI 54451	Public notice, mail survey
Ross, Samuel	None given.	2419 Grove Avenue Racine, WI 53405	Public notice, mail survey
Ruckheim, Walter	USDA – Forest Service	68 South Stevens Street Rhineland, WI 54501 715-362-1329	Public notice, mail survey, telephone contact
Rusfeldt, John	None given.	PO Box 663 Iron River, WI 54847	Public notice, mail survey
Rusk Co. Forest Administrator	Wisconsin County Forest Administrators	311 Miner Avenue, Suite 151 Ladysmith, WI 54848 715-532-2113 <a href="mailto:pteska@ruskcounty.wi.us">mailto:pteska@ruskcounty.wi.us</a>	Public notice, mail survey
Sappi Fine Paper	Sappi Fine Paper	20 North 22nd St Cloquet, MN 55720	Public notice, mail survey
Sauer, Chuck	None given.	740 Squirrel Lane Marathon, WI 54448	Public notice, mail survey

Sawyer Co. Forest Administrator	Wisconsin County Forest Administrators	Courthouse, P.O. Box 880 Hayward, WI 54843 715-634-4839 <a href="mailto:greg.peterson@sawyercounty.gov">greg.peterson@sawyercounty.gov</a>	Public notice, mail survey
Schlobobaum, Steve	Assitant to Regional Forester, USDA Forest Service	USDA Forest Service	Office interaction
Schloer Logging	Schloer Logging	13876 Ash Lane Butternut, WI 54514	Public notice, mail survey
Schlosser Lumber Inc.	Schlosser Lumber Inc.	HC 63 Box 36 Durand, WI 54736	Public notice, mail survey
Schnorr, John	Wisconsin Off-Highway Vehicle Assn., Trout Unlimited	N8163 Rolling Hills Dr. Fond du Lac, WI 54935	Public notice, mail survey
Schoettpelz, Jim	None given.	1971 London Road Green Bay, WI 54311	Public notice, mail survey
Schumann, William	None given.	PO Box 249 213 K Manitou Rd. Manitowish Waters, WI 54545	Public notice, mail survey
Schutt, Marty	Environmental Director, St. Croix Chippewa Indians of Wisconsin	246663 Angeline Ave. Webster, WI 54893-9246 715-342-2195x106	Public notice, mail survey
Schwecke, Pete	Marion Plywood	P.O. Box 497 Marion, WI 54950	Public notice, mail survey
Seefeld, James	None given.	W5756 Hites Lane Medford, WI 54451	Public notice, mail survey
Severt, Jane	Lincoln Co. Forest Administrator	Courthouse Annex 1106 E. Eighth Street Merrill, WI 54452 715-536-0327 <a href="mailto:bwengeler@co.lincoln.wi.us">bwengeler@co.lincoln.wi.us</a> <a href="mailto:jsevert@co.lincoln.wi.us">jsevert@co.lincoln.wi.us</a>	Public notice, mail survey, e-mail inquiry
Shamco, Inc.	Shamco, Inc.	Box 436 Iron River, MI 49935	Public notice, mail survey
Sharnek, Brad	None given.	Route 1 Box 72 Laona, WI 54541	Public notice, mail survey
Sheeks, Steve	None given.	N58W24234 Clover Road Sussex, WI 53089	Public notice, mail survey
Shumilo, John G.	None given.	1712 Robbie Lane Mt. Prospect, IL 60056	Public notice, mail survey
Simon, James B.	None given.	91 South Reserve Avenue Fond Du Lac, WI 54935	Public notice, mail survey
Slater, David F.	Louisiana-Pacific Corporation	650 "A" Avenue Gwinn, MI 49841	Public notice, mail survey
Smith, Allen	None given.	Box 33 Boulder Junction, WI 54512	Public notice, mail survey
Smith, Dave	None given.	1400 Chippewa Trail Mosinee, WI 54455	Public notice, mail survey

Smith, Jerry	THPO, Lac Courte Oreilles Band of Lake Superior Chippewa Indians	13394 W. Trepania Rd., Bldg 1 Hayward, WI 54843-2186 715-634-8934	Public notice, mail survey
Smith, Norman and Sandra	None given.	2057 E Anvil Lake Road Eagle River, WI 54521	Public notice, mail survey
Socha, Greg	None given.	<a href="mailto:gsocha@paconserve.org">gsocha@paconserve.org</a>	E-mail inquiry
Soder, Eugene	None given.	PO Box 519 Three Lakes, WI 54562	Public notice, mail survey
Sohasky, Mike	None given.	1633 Neva Road Antigo, WI 54409	Public notice, mail survey
Solheim, Stephen	None given.	5138 Ridge Oak Dr. Madison, WI 53704	Public notice, mail survey
Sommerfield, Skip	Wisconsin DNR	875 4 <sup>th</sup> Ave. South Park Falls, WI 54552	Public notice, mail survey
Souba, Fred	Stora Enso North America	P.O. Box 8050 Wisconsin Rapids, WI 54495-8050	Public notice, mail survey
Soulier, Ervin	Natural Resource Manager, Bad River Band of Lake Superior Chippewa Indians	PO Box 39, 100 Maple Lane Odanah, WI 54861 715-682-7103	Public notice, mail survey
Spickerman, Landis	None given.	Route 1, Box 283B Highbridge, WI 54846 715-492-5969	Public notice, mail survey
Spickerman, Landis/Steven	None given.	RR 1 Box 283 B Highbridge, WI 54846	Public notice, mail survey
Stern, Bill	None given.	1324 Williamson St. # 1 Madison, WI 53703	Public notice, mail survey
Stibbe Excavating & Grading	Stibbe Excavating & Grading	PO Box 351 Antigo, WI 54409 715-623-3914	Public notice, mail survey
Stier, Jeff	University of Wisconsin, Madison, Dept. of Forestry	120 Russell Labs, 1630 Linden Drive Madison, WI 53706	Public notice, mail survey
Stoebe, Frederic	None given.	Route 1 Box 77 Drummond, WI 54832	Public notice, mail survey
Stoiber, Dave	Thilmany LLC	P.O. Box 385 Waupaca, WI 54981	Public notice, mail survey
Stolze, George	Louisiana-Pacific Corporation	Box 98 Sagola, MI 49881	Public notice, mail survey
Stone Creek Contractors	Stone Creek Contractors	E1664 Canyon Creek Ln Luxemburg, WI 54217-8278 920-845-2799	Public notice, mail survey
Stora Enso North America	Stora Enso North America	Po Box 8050, Wisconsin Rapids, WI 54495	Public notice, mail survey
Stroup, Dick and Nancy	Needlepoint Kennels	151 Needles Point Road Evans City, PA 16035 <a href="mailto:engsettersrus@aol.com">engsettersrus@aol.com</a>	Public notice, mail survey, e-mail inquiry
Suchan, Donald	None given.	13815 US Highway 10 Cato, WI 54206	Public notice, mail survey

Summitt Forests, Inc.	Summitt Forests, Inc.	PMB 218 1257 Siskiyou Blvd Ashland, OR 97520 541-535-8920	Public notice, mail survey
Superior Wilderness Action Network	Superior Wilderness Action Network	RR1, Box 53 Sandstone, MN 55072	Public notice, mail survey
Swank, Marty	Country Trail Assn.	North 808 14 <sup>th</sup> Ave. West Ashland, WI 54806	Public notice, mail survey
Szarka, Fred	NPS NCTA Trail Manager	700 Rayovac Dr., Suite 100 Madison, WI 53711	Public notice, mail survey
Taylor Co. Forest Administrator	Wisconsin County Forest Administrators	224 South Second Street Medford, WI 54451 715-748-1486 <a href="mailto:brad.ruesch@co.taylor.wi.us">brad.ruesch@co.taylor.wi.us</a>	Public notice, mail survey, e-mail inquiry
Taylor County Board	Taylor County Board	224 South Second Street Medford, WI 54451	Public notice, mail survey
The County Journal	The County Journal	PO Box 637 Washburn, WI 54891	Public notice, mail survey
The Trust for Public Land	The Trust for Public Land	2610 University Ave., Suite 30 St. Paul, MN 55114	Public notice, mail survey
Thimm, Tom	Tom Thimm Logging, Inc.	71994 E Cayuga Rd Mellen, WI 54546	Public notice, mail survey
Thompson, Martin	None given.	539 Aberdeen Road Frankfort, IL 60423	Public notice, mail survey
Thompson, Robert	None given.	35 8th Avenue Clayton, WI 54004	Public notice, mail survey
Thorne, Aaron	None given.	PO Box 160 St. Germain, WI 54558 <a href="mailto:akthorne1@verizon.net">akthorne1@verizon.net</a>	Public notice, mail survey, e-mail inquiry
Thornton, Pat	Bayfield County Tourism Director	PO Box 832 Washburn, WI 54891	Public notice, mail survey
Thuermann, Dennis	None given.	606 Oakwood Drive Hartland, WI 53029	Public notice, mail survey
Timber Brokerage	Timber Brokerage	893 Gibbs City Road Iron River, MI 49935	Public notice, mail survey
Timmerman, Joe	Midwest Forest Products	15954 Rivers Edge Drive, Suite 201 Hayward, WI 54843 <a href="mailto:jtimmerman@midwestforestproducts.com">jtimmerman@midwestforestproducts.com</a>	Public notice, mail survey, e-mail inquiry
Tormohlen, Dave	Louisiana-Pacific Corporation	P.O. Box 190 Tomahawk, WI 54487	Public notice, mail survey
Town of Aurora	Town of Aurora	RR 1 Box 105 Niagara, WI 54151	Public notice, mail survey
Town of Caswell	Town of Caswell	RR 2 Box 1405 Cavour, WI 54511	Public notice, mail survey
Town of Crescent	Town of Crescent	6695 Holly Drive Rhineland, WI 54501	Public notice, mail survey
Town of Emery	Town of Emery	W3601 Maple Drive Phillips, WI 54555	Public notice, mail survey

Town of Gillett	Town of Gillett	RR 2 Box 270 Cecil, WI 54124	Public notice, mail survey
Town of Hill	Town of Hill	W2791 Risberg Road Ogema, WI 54459	Public notice, mail survey
Town of Kennan	Town of Kennan	N2580 County Road N Kennan, WI 54537	Public notice, mail survey
Town of Laona	Town of Laona	RR 1 Box 362 Laona, WI 54541	Public notice, mail survey
Town of Minocqua	None given.	PO Box 168 Minocqua, WI 54548	Public notice, mail survey
Town of Woodruff	None given.	PO Box 560 Woodruff, WI 54568	Public notice, mail survey
Trepania, Al	Lac Courte Oreilles	RR 2 Box 2700 Hayward, WI 54843	Public notice, mail survey
Truckey, Roger	None given.	3359 Haven Place Green Bay, WI 54313	Public notice, mail survey
Tucker, Wesley	None given.	3977 Elliot Road Wabeno, WI 54566	Public notice, mail survey
Tutor, Doug	Forestry Aide, Bad River Band of Lake Superior Chippewa Indians	PO Box 39, 100 Maple Lane Odanah, WI 54861 715-682-7123	Public notice, mail survey
U.S. Department of Interior	US Department of Interior	1849 C Street NW Washington, DC 20240	Public notice, mail survey
Uihlein, George	None given.	231 West Wisconsin Milwaukee, WI 53203	Public notice, mail survey
University of Wisconsin, Eau Claire	University of Wisconsin, Eau Claire	Box 4004 105 Garfield Avenue Eau Claire, WI 54702	Public notice, mail survey
University of Wisconsin, Superior	University of Wisconsin, Superior	P.O. Box 2000 Superior, WI 54880	Public notice, mail survey
USDA Forest Service - Rocky Mountain Region	USDA Forest Service - Rocky Mountain Region	P.O. Box 25127 Lakewood, CO 80225	Public notice, mail survey
Van Hollen, John	None given.	Box 256C, Route 2 Mason, WI 54856	Public notice, mail survey
Van Zile, Tina	Environmental Director, Sokoagon Chippewa Community, Mole Lake Chippewa Tribe	3051 Sand Lake Road Crandon, WI 54520 715-478-7605	Public notice, mail survey
Vernon Co. Forester/Parks Administrator	Wisconsin County Forest Administrators	220 Airport Avenue Viroqua, WI 54665 608-637-5485	Public notice, mail survey
Vetterneck, David	None given.	PO Box 124 Lac Du Flambeau, WI 54538	Public notice, mail survey
Vilas Co. Forest Administrator	Wisconsin County Forest Administrators	330 Court Street Eagle River, WI 54521 715-479-5160 <a href="mailto:vcfor@co.vilas.wi.us">vcfor@co.vilas.wi.us</a>	Public notice, mail survey
Vissering, Dennis	None given	<a href="mailto:dvissering@portup.com">dvissering@portup.com</a>	E-mail inquiry

Vozka, Wiitala and Nancy	None given.	W7978 City Hwy D Westboro, WI 54490 715-427-3481	Public notice, mail survey
Vybiral, Ray	None given.	11726 Highbank Lane Suring, WI 54174 <a href="mailto:vybiral@centurytel.net">vybiral@centurytel.net</a>	Public notice, mail survey, e-mail inquiry
Wabeno Public Library	Wabeno Public Library	P.O. Box 340 Wabeno, WI 54566	Public notice, mail survey
Waelchil, Allan	Wis. Consulting Foresters	W7251 Belle Plaine Avenue Shawano, WI 54166	Public notice, mail survey
Walker, Mark	None given.	Suite 211, Old Fort Square 211 North Broadway Green Bay, WI 54303-2757	Public notice, mail survey
Waller, Dr. Donald M.	Dept. of Botany	430 Lincoln Drive University of Wisconsin Madison, WI 53706 (608) 263-2042 <a href="mailto:dmwaller@wisc.edu">dmwaller@wisc.edu</a>	Public notice, mail survey, e-mail inquiry, telephone interview
Wallow, Donald	None given.	Route 1 Box 217 Glidden, WI 54527	Public notice, mail survey
Warren, Douglas	None given.	8403 Van Dornick Road Pulaski, WI 54162	Public notice, mail survey
Washburn Co. Forest Administrator	Wisconsin County Forest Administrators	850 W. Beaver Brook Avenue Ste 4 Spooner, WI 54801 715-635-4490 <a href="mailto:mlpeters@co.washburn.wi.us">mlpeters@co.washburn.wi.us</a>	Public notice, mail survey
Watruba, Bruce	None given.	17575 Pine Acres Lane Townsend, WI 54175	Public notice, mail survey
Wawronowicz, Larry	Natural Resource Director, Lac du Flambeau Band of Lake Superior Chippewa Indians	PO Box 67, 418 Little Pines Road Lac du Flambeau, WI 5453 715-588-3303	Public notice, mail survey
Wedemayer, Edward	None given.	623 Decker Drive West Bend, WI 53095	Public notice, mail survey
Welch, Marge	Midwest Field Director	PO Box 1417 Madison, TN 37116	Public notice, mail survey
Wenk Richard	None given.	4118 Liberty Court Eau Claire, WI 54703	Public notice, mail survey
Wetzel, Alan	USDA Forest Service	<a href="mailto:awetzel@fs.fed.us">awetzel@fs.fed.us</a>	E-mail inquiry
Wick, Tony	None given.	N92w25091 Blue Heron Road Sussex, WI 53089	Public notice, mail survey
Wiitala Vozka Logging	Wiitala Vozka Logging	W7978 County Road D Westboro, WI 54490	Public notice, mail survey
Wild Rivers Forestry Inc.	Wild Rivers Forestry Inc.	W6666 Judy Street Wausaukee, WI 54177	Public notice, mail survey
Wilhelm, Willard	None given.	PO Box 813 Ashland, WI 54806	Public notice, mail survey
Williams Forestry & Associate	Williams Forestry & Associate	PO Box 1663 Bloomington, IL 61702-1663 309-828-2318	Public notice, mail survey

Wilson, Lynn	Plum Creek Timber	1411 North 4 <sup>th</sup> Street, Ste. 104 Tomahawk, WI 54487-2154	Public notice, mail survey
Wisconsin Woodland Owners Assn.	Wisconsin Woodland Owners Assn.	PO Box 285 Stevens Point, WI 54481	Public notice, mail survey
Wissink, Rich	None given.	704 Surrey Lane Merrill, WI 54452-3327	Public notice, mail survey
Wolslegel, Thomas	None given.	645 East Edgewood Drive Appleton, WI 54915	Public notice, mail survey
Wood Co. Forest Administrator	Wisconsin County Forest Administrators	Courthouse P.O. Box 8095 Wisconsin Rapids, WI 54495-8095 715-421-8549 <a href="mailto:fschubert@co.wood.wi.us">fschubert@co.wood.wi.us</a>	Public notice, mail survey
Woodford, Jim	Ecologist, Bureau of Endangered Resources Wisconsin Dept. of Natural Resources	Rhinelander, WI 54501 (715) 365-8856 <a href="mailto:james.woodford@wisconsin.gov">james.woodford@wisconsin.gov</a>	E-mail contact
Wydeven, Adrian	Wisconsin Dept. of Natural Resources	PO Box 220 Park Falls, WI 54552	Public notice, mail survey
Xjuneau County Forest Administrator	Xjuneau County Forest Administrator	250 Oak Street Mautson, WI 53948-1345	Public notice, mail survey
Yost, Gaylord	None given.	PO Box 1013 Milwaukee, WI 53201-1013	Public notice, mail survey
Zastrow, Darrell	Wis. Department of Natural Resources Forestry Division	P.O. Box 7921 Madison, WI 53707-7921	Public notice, mail survey
Zavada, Paul	None given.	PO Box 341 Truro, MA 02666	Public notice, mail survey
Zelinski Bros.	Zelinski Bros.	24125 Beaver Station Rd. Watersmeet, MI 49969 906-358-4676	Public notice, mail survey
Zichella, Carl	None given	214 N. Henry St., Suite 200 Madison, WI 53703	Public notice, mail survey
Zimmer, Gary	Ruffed Grouse Society	PO Box 116 Laona, WI 54541	Public notice, mail survey
Zimmerman, Larry	None given.	W7320 County D Westboro, WI 54490	Public notice, mail survey
Zorn, James	Policy Analyst I, Great Lakes Indian Fish and Wildlife Commission	PO Box 9, Maple Lane Odanah, WI 54861 715-682-6619, ext. 101	Public notice, mail survey
Zorn, Jim	Executive Administrator, Great Lakes Indian Fish and Wildlife Commission	PO Box 9, Maple Lane Odanah, WI 54861 715-682-6619, ext. 148	Public notice, mail survey

## APPENDIX VIII: Peer review addenda (confidential)

### CNNF Peer Review #1

**Peer Reviewer:** Lee Frelich

**Reviewer Specialization:** Forest Ecology

#### Test Evaluation Report Quality:

How would you rate the overall quality of the test evaluation report?

High  Acceptable  Poor

Do team observations and findings clearly support the determination of conformance reached?

Yes  No  Comments: Yes, I studied the stakeholder comments and CNNF responses to the first draft and think the team did a good job of balancing stakeholders concerns, CNNF concerns, and FSC standards in the final list of CARs and Observations.

Areas for improvement:

Editing/Formatting:  Comments: Page 84 references Appalachia Region under applicability to old growth sectionb--should probably reference Lake States

**SmartWood Response:** The Applicability Note including reference to the Appalachia Region was mistakenly included in the CNNF report and has now been removed.

Lack of Clarity:  Comments:

Technical Analysis:  Comments: (reference weak sections)

Information lacking:  Please indicate areas: Page 28 when describing forest types in 4th paragraph under ecological context you should probably also include white/red pine on the list of major forest types.

**SmartWood Response:** Approximate acreage figures for red pine and white pine (combined) have been included in the section on ecological context as suggested by the peer reviewer. The source of this information is: North Central Forest Experiment Station – U.S. Forest Service, Resource Bulletin NC-194, The Forest Resources of Chequamegon-Nicolet National Forest, published in 1998.

Other comments: Acreage totals are confusing--see comment table

**SmartWood Response:** See response in comment table.

#### Test Evaluation Process:

Based upon the information in the test evaluation report, do you have any comments on the test evaluation process (i.e. team composition, field time, stakeholder consultation) and the adequacy of fieldwork as the basis for making the determination of conformance?

Comments: They really did a good (and massive) job of assembling and analyzing information and stakeholder comments

**Report Conclusions:**

Is the determination of conformance recommendation of the team justified by the reports observations and findings? Yes  No  If no, explain?

Do you agree with determination of conformance recommendation of the team? Yes  No  If no, state reasons why?

**Peer Reviewer Comments Table:**

Report section	Issue: Disagreement or suggested action	SW Response
Public summary, page 33 (Appendix II, Silvicultural Systems)	Is it really true that all uneven-aged management is individual tree selection--with no group selection? Variability in gap sizes, even within one forest type such as northern hardwoods, is one of the primary ways to insure diversity in regeneration and ecological processes. I am not sure exactly where this should be mentioned within the assessment, but it seems rather critical to hardwood forest management, and it should be mentioned somewhere.	CNNF uneven-aged management activities are mostly based on gap-phase silviculture. Timber harvesting under these prescriptions includes both single tree selection and small group selections. The text in the public summary has been modified to reflect this correction.
9.3a, pages 128-129	Please clarify whether CNNF allows management activities such as removal of invasive species in old growth, HCVF, and wilderness areas.	CNNF does allow control of invasive species in old growth, HCVF, wilderness areas and other special management areas. The findings of Indicator 9.3.a have been appropriately modified.
Pages 30-32, 76	I found it hard to understand the acreage totals in the report. For example on page 32, an acreage of 184,600 is given for R,T and E ecosystems, whereas on page 76, 152,000 is listed. Are these different categories? Do they include wilderness areas? What about the 1.522 million acre total versus the 1.318 acreage in the scope of evaluation?	The CNNF is comprised of a total of 1,522,485 acres in all areas. Of this total, 1,318,863 acres are forested. The acreage reference of 152,000 acres on page 76 (AC 6.1.1) is incorrect and has been changed to 184,600, consistent with the information provided by CNNF in Appendix I on page 32

## CNNF Peer Review #2

**Peer Reviewer:** Don Floyd

**Reviewer Specialization:** Forest Policy & Social Science

### Test Evaluation Report Quality:

How would you rate the overall quality of the test evaluation report?

High  Acceptable  Poor

Do team observations and findings clearly support the determination of conformance reached?

Yes  No  Comments: Mostly

Areas for improvement:

Editing/Formatting:  Comments: several grammatical problems

**SmartWood Response:** The report has been reviewed several times for spelling and grammatical errors, and again in response to the peer reviewer comments.

Lack of Clarity:  Comments: a good bit of redundancy

**SmartWood Response:** The SmartWood auditors Findings are associated with the Indicators provided in the FSC Lake States Region standard, via the FSC US Federal Lands Policy (Department of Defense/Department of Energy Indicators) and the Additional Considerations. SmartWood agrees that there is a level redundancy within some elements of the standards.

Technical Analysis:  Comments: stakeholder participation section

**SmartWood Response:** Numerous modifications have been made to the stakeholder consultation section (Section 2.6) and the stakeholder consultation comment table (Section 3.1) in response to the peer reviewer's comments. These changes are detailed below

Information lacking:  Please indicate areas:

Other comments: It is not clear to me which of the standards are the additions and which are part of the normal process. This should be made clear in the text.

**SmartWood Response:** Additional text has been added to the end of the last paragraph in Section 2.1 of the report in an effort to clarify which Indicators are associated with the FSC Lake States standards, which Indicators are attributed to the FSC US Federal Lands Policy and which were developed specifically for this project as Additional Considerations. Additional text was also added to the third paragraph to more clearly describe the process of developing Additional Considerations for the CNNF, including the fact that the 17 Additional Considerations developed for the ANF test evaluation were used as the basis for the 19 Additional Considerations developed for the CNNF test evaluation.

### Test Evaluation Process:

Based upon the information in the test evaluation report, do you have any comments on the assessment process (i.e. team composition, field time, stakeholder consultation) and the adequacy of fieldwork as the basis for making the certification decision?

Comments: I have indicated some significant questions about the stakeholder participation process and the reporting of the results

**Report Conclusions:**

Is the certification recommendation of the team justified by the reports observations and findings? Yes  No  If no, explain?

Do you agree with certification recommendation of the team? Yes  No  If no, state reasons why?

**Peer Reviewer Comments Table:**

Report section	Issue: Disagreement or suggested action	SW Response
Section 2.1	I have two general observations that discomfit me. The first is probably beyond the scope of this report, but it relates to the larger experiment of certifying national forests. If the FSC standard was not complete enough to use in NF certification, what are the implications of using it for other public lands such as state forests where the management regime is similar? More specifically, it would be a good idea to clearly indicate which part of the standards are derived from regular regional FSC guide, the DOD/DOE guide and the "additional items."	<p>The per reviewer raises an important point that could be subject to further debate within the broader stakeholder community should the USDA Forest Service declare their intention to pursue FSC certification on one or more national forests. However, with respect to this particular project, in keeping with the terms of our contractual obligations to The Pinchot Institute for Conservation, SmartWood was obliged to develop Additional Considerations while also integrating the FSC US DOD/DOE Indicators into the test evaluation of the CNNF.</p> <p>As stated in the report, FSC certification is not a potential outcome of this test evaluation of CNNF. The FSC US policy on certification of federal lands has established three thresholds that must be met before certification proceeds on any given federal ownership in the U.S. They are:</p> <ol style="list-style-type: none"> <li>1) Willing landowner participation in the certification process.</li> <li>2) Public consensus concerning timber harvesting and other relevant, major resource management practices and uses that may be affecting the forest in question.</li> <li>3) Existence of national-level indicators that address the special resource management, legal, technical, procedural, and governance issues surrounding the federal ownership type in question.</li> </ol>

		<p>Formal determination of whether the three thresholds are met for any federal lands to be eligible for FSC certification will be made by the FSC US Board of Directors.</p> <p>In a statement issued in February 2003, the FSC-U.S Board of Directors expressed that federal forest ownerships in the U.S. do not currently meet the three sets of threshold standards of the FSC-U.S. Federal Lands Policy. The FSC US notes that federal lands that are currently FSC certified (DOD/DOE installations and Marsh Billings Rockefeller National park) are considered exceptions to the above statement. In order to address the third threshold (above), FSC US has issued special indicators for certification of DOD/DOE installations. Currently, these are the only special indicators developed for the evaluation of federal lands in the U.S.</p> <p>To the extent feasible given the limited scope of the project, The Pinchot Institute requested that SmartWood develop Additional Considerations to somewhat emulate this process of developing national level indicators for national forests as required in the third threshold of the FSC US Federal Lands Policy.</p> <p>With respect to the last issue raised by the peer reviewer regarding the need for increased clarity as to the origin of the standards, please see the SmartWood Response to this issue under the heading "Areas for Improvement" associated with "Assessment Report Quality".</p>
Section 2.6	<p>Second, the stakeholder involvement responses were very low. Reporting percentages in a case like this often suggests a higher clarity than is appropriate. I think this section of the report should be changed by reporting the raw numbers. The response results are very limiting and it would be difficult to draw any reliable conclusions based on so few responses. Unfortunately this calls into question the utility of this entire section. I think that there is very little that the certification team can say with confidence about how the general public (or even the informed public) regards the issues on the forest based on the surveys.</p>	<p>SmartWood concurs with the peer reviewer that a 16% response rate to the survey questionnaire is relatively low, and that the responses of 150 stakeholders can not be considered as representative of "public opinion" on the specific issues addressed in the surveys, or on the management of the CNNF. SmartWood does not suggest that these comments should be considered representative of the broader public opinion on CNNF forest management or of any specific issue. Statements made, for example, in section 3.1 are representative only of the 150 stakeholders surveyed and of stakeholders interviewed or providing input through other venues.</p> <p>Survey results were used as supplemental information, to identify potential issues that may</p>

	<p>Response rates this low beg alternative strategies. Holding a public meeting on Halloween night pretty much guarantees the public won't be there.</p>	<p>not have otherwise been discovered, or to reinforce observations made by the auditors through other avenues of evidence gathering. As described in Section 2.6 of the test evaluation report: "Stakeholder inputs were used as supporting evidence or verification during the evaluation process, to provide the evaluation team with additional perspectives on the CNNF forest management, and to point toward issues that need further exploration."</p> <p>The stakeholder consultation measures employed by SmartWood in the CNNF test evaluation are consistent with the established standards of major third party forest certification programs (e.g. FSC Standard for Stakeholder Consultation for Forest Evaluation, FSC STD 20 006). The purpose of stakeholder consultation measures undertaken within the context of third party forest auditing is to evaluate conformance to the standards. As such, our intent was decidedly not to define public opinion on CNNF forest management issues, but rather to enhance the auditing process. Text has been added to Section 2.6 and Section 3.1 to clarify the intent of the survey questionnaire and how the results were interpreted and used for the purposes of this test evaluation.</p> <p>To this end, our stakeholder consultation measures were appropriate, relevant, and useful in aiding the auditors to make credible judgments on conformance to the standards used in the test evaluation. SmartWood auditors contacted a diverse range of stakeholders with respect to geographic context (national, regional, local) as well as perspective (local residents, public land management agencies, regulatory agencies, tribal concerns, environmental organizations, forest workers, employees, forest users, academics). Additionally, a variety of techniques were used to facilitate stakeholder input including: posting and distribution of a public notice announcing the test evaluation and providing contact information for providing comment; two public meetings publicly advertised in the local media; individual interviews; and distribution by mail of a survey questionnaire.</p> <p>SmartWood concurs that alternative strategies for stakeholder consultation – particularly for local stakeholders - should be considered for future projects of this size. SmartWood also</p>
--	--	---

		<p>concur that holding a public meeting on Halloween is far from optimal; however, the audit team was constrained by both budget and schedule and had limited options. The first meeting, held two days earlier, was also very poorly attended (1 person), suggesting that even if the second meeting were held on a different day (other than Halloween), attendance may not have been much better. In any event, SmartWood is always seeking to improve on our stakeholder consultation measures, and the peer reviewer's comments are appreciated.</p> <p>Also of note is that the FSC Lake States Standards include numerous Criteria and Indicators that require forest management operations to conduct stakeholder consultation. These standards are most demanding for public agencies. CNNF has conducted extensive stakeholder consultation activities as a core element of their management responsibilities. SmartWood reviewed and evaluated the effectiveness of these activities during the course of conducting this test evaluation (e.g., Criteria 2.2, 3.3, 4.4 and 8.2.d).</p> <p>With respect to reporting percentages rather than raw numbers, the report has been modified in several sections to include either raw numbers, or the reported percentage is accompanied by the actual number for total surveys returned to provide context.</p>
Section 2.6	Page: 195 How were instrument reliability and validity determined? This should be reported.	Survey instrument reliability and validity were not calculated. This survey was conducted as an alternative method for facilitating stakeholder participation, not as a formal, scientific measurement of public opinion.
Section 2.6	Page: 195 I've read this section several times and find it confusing. My reading suggests that surveys were sent to 500 stakeholders+264 employees + 183 Plan commenter's = 947 surveys. The response rate was 16%. You should report the N for the total number of usable surveys which appears to be in the 150 range. This suggests a serious problem: I don't think one can say much about what the "public" thinks about CNNF management based on such low results. In the table that follows, I think it would be better to report raw	The text has been modified to clarify the number of survey questionnaires mailed and the number of completed surveys received. A total of 481 (~ 500) surveys were mailed to external stakeholders (excluding the 264 CNNF employees). A total of 33 surveys were returned undeliverable, and a total of 115 usable (completed) surveys were returned. By adding the 264 CNNF employee stakeholders to the 481 external stakeholders, and then subtracting 33 returned undeliverable, the total number of surveys <i>delivered</i> equals 712. By dividing the 115 returned surveys by the 712 delivered, we calculated a return rate of 16.2%.

	numbers rather than percentages.	
Section 3.1, Principle 1	Page: 196 Rather than report percentages, it would be more revealing to report numbers—X out of X reported satisfied. Were categories collapsed?	The text for Stakeholder Comment #1 under Principle 1 has been modified to include the total number of respondents to provide context to the figure of 86% of respondents. Text was also modified to clarify that survey responses were used only as supporting information, not exclusively as conclusive statements about stakeholder opinion.  All categories were collapsed; all stakeholders were considered together in a single population of respondents, including CNNF employees.
Section 3.1, Principle 2	This is a very small n. I think you should report the raw numbers.	The text for Stakeholder Comment #1 under Principle 2 has been modified to include the total number of respondents to provide context to the figure of 2/3rds of respondents. Similar modifications have been made throughout the Stakeholder Comment table.
Section 3.1	I'm not certain how significant the decimals are here.	Survey results were reported to the nearest tenth. SmartWood agrees that rounding to the nearest whole number would be adequate for the purposes of this report. All survey results posted in the Stakeholder table in Section 3.1 of the report have been rounded to the nearest whole number.

## APPENDIX IX: SmartWood Additional Considerations

*A total of 19 Additional Considerations have been developed through a process that began with the adoption of 17 Additional Considerations used in June 2006 for the test evaluation of the Allegheny National Forest (ANF) in Pennsylvania. An expert panel of six regional resource professionals was asked to provide comment on the 17 draft Additional Considerations, and also to identify any existing gaps in the standards relative to the unique aspects of the forest management of the CNNF. The revised draft CNNF Additional Considerations were then provided to a broader group of targeted stakeholders in October 2006. Stakeholders were asked through a questionnaire to first identify key issues relating to the management of the CNNF, and then to provide input on the applicability and adequacy of the FSC standards to address any considerations that are unique to the National Forest System. These special concerns relate to perceived limitations of the FSC standards [FSC Lake States and Central Hardwood Region Standards and FSC Department of Defense (DOD)/Department of Energy (DOE) standards] for evaluating CNNF forest management operations. SmartWood compiled all input received as described above and evaluated these special concerns to determine whether they should be used as Additional Considerations for the CNNF. Draft Additional Considerations were then subjected to an internal review by SmartWood staff and the SmartWood auditors. As a result of this cumulative process, 10 Draft (ANF) Additional Considerations were modified, one was deleted and three new Additional Considerations were identified resulting in 19 CNNF Additional Considerations.*

*The resulting Additional Considerations have been incorporated into the Test Evaluation of the CNNF. SmartWood/PwC will evaluate CNNF's performance against these Additional Considerations in a manner consistent with the auditing protocol employed for all other indicators included in the Test Evaluation with the exception that Corrective Action Requests have not been issued for Additional Considerations..*

*Additional Considerations are also integrated within Appendix III: Test Evaluation Conformance Checklist. Within Appendix III, the Additional Considerations are located beneath the corresponding Criterion in the FSC Standard. Additional Considerations are numbered such that they identify the corresponding Criterion in the FSC Standard (e.g. AC 1.1.2 is the second Additional Consideration associated with FSC Criterion 1.1).*

### Summary of CNNF Additional Considerations

**AC 1.1.1.** By policy and action, managers of National Forests shall demonstrate compliance with applicable federal laws and administrative requirements (e.g. NEPA, Roadless Area Conservation Rule and associated State Petitioning Rule, ESA, Clean Water Act, NFMA, MUSYA, The Wilderness Act, Wild and Scenic Rivers Act, Organic Act, CFR, Title 7, applicable sections of the US Code, the Forest Service Manual, and Forest Service Handbooks).

**AC 1.1.2.** Managers of National Forests shall comply with state, county, local and municipal laws except where federal law preempts state, county and local laws. When federal laws preempt compliance with those of other jurisdictions, corresponding statutes or regulations shall be specifically referenced and described.

**AC 3.2.1.** Solicitation of tribal collaboration is tailored to incorporate cultural sensitivity and awareness and will be undertaken with a commitment to honor government to government relationships.

*For example:*

- *One or more employees are formally designated as liaison to tribes.*
- *Employees that formally interact with tribes attend cultural and sensitivity training with affected tribes.*
- *Collaboration with tribes involves appropriate levels of commitment and participation from leadership within the National Forest.*

**AC 3.2.2.** Consultation techniques used for soliciting tribal input are adapted as necessary to achieve effective communication and collaboration, and will include both written and verbal correspondence.

*For example:*

- *Current lists of appropriate contact persons are maintained for each affected tribe according to subject area and level of communication (e.g. written notice v. verbal contact).*
- *Sponsor and participate in forums for exchange of information and perspectives with tribal resource managers on issues pertinent to the management of national forests and surrounding landscapes.*

**AC 4.1.1.** A comprehensive listing of all applicable laws, regulations and administrative requirements and their applicability to USFS forest management shall be maintained with listed documents made accessible to all employees.

**AC 4.1.2.** Migrant worker conditions (including transit to and from work sites) are monitored by both contractors and Forest Service personnel for compliance with USFS policies and contract specifications, applicable labor laws and other associated regulations.

**AC 6.1.1.** Managers of National Forests use available science and information to prepare a written description of the range and variation in historical forest conditions, spatial patterns and disturbance regimes (reference variation).

*For example:*

- *Description of the intensity, distribution, frequency, size, resulting landscape patterns, and residual stand structures of the major disturbance regimes.*
- *Description of the reference variation of estimated composition of forest cover types, typical age class distribution, and estimated stand structures.*
- *Existing tools (e.g. LANDFIRE program) are considered when defining historical landscape conditions.*

**AC 6.1.2.** The description of the reference variation of forest conditions is made available for public review and comment prior to its use in management decisions.

**AC 6.1.3.** Current forest conditions are compared at the landscape scale with the reference variation of forest conditions. Measures of current forest condition include, but are not limited to:

- Area, composition (e.g., species and age class distribution) and spatial representation of ecological types including old growth and late seral forests;
- Composition and distribution of habitat-related structural elements (e.g. snags, den trees, mast trees, coarse woody debris, thermal and hiding cover).
- Climate trends and associated effects on assemblages of flora and fauna.

**AC 6.1.4.** The effects of national forest management activities on neighboring lands, as well as the effects of activities in surrounding lands on national forests, are included in the scope of environmental impact assessments on National Forests.

**AC 6.1.5:** Intensive (e.g. results in significant alteration to the ecosystem) uses and forest management activities are allocated to those lands with relatively lower ecological sensitivity.

**AC 6.2.1.** A comprehensive list of the species of interest and species of concern (e.g., species with notable conservation need) is maintained for each National Forest. Managers demonstrate through polices and actions that said species, and the ecological systems that support the species, are duly considered in the course of forest management.

**AC 6.3.a.1:** Climate trends and associated effects on assemblages of flora and fauna are considered when developing strategies for retention of endemic species.

**AC 6.3.b.1.** Forest management practices maintain or restore aquatic ecosystems and habitat features, wetlands, and forested riparian areas (including springs, seeps, fens, and vernal pools).

**AC 6.5.1.** Where federal, state, county and local BMP guidelines, recommendations, and regulations provide several options, the most effective measure for protecting the affected resource is applied.

**AC 6.9.1.** Managers of National Forests identify activities by which invasive exotic species (e.g. plants, insects, animals) become established. Control mechanisms, including preventative strategies, are implemented for high risk activities associated with Forest Service management responsibilities.

**AC 7.1.a.1.** Provisions for outdoor recreation are integrated with other uses and appropriately incorporated into management objectives and planning documents.

**AC 9.1.1.** By policy and action, managers of National Forests shall demonstrate compliance with Section 2(c) of the Wilderness Act and the Wild and Scenic Rivers Act in the course of identifying and designating HCVF.

**AC 9.1.2.** National Forest managers review and consider use of existing HCVF planning tools (e.g. Proforest HCVF Tool Kit, Canadian National Framework for HCVF) in the development of a process for identifying HCVF.

## APPENDIX X: FMO map