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

Ohio DNR Division of Forestry

SCS-FM/COC-00130N

ODNR-Division of Forestry
2045 Morse Road, Bldg H-1
Columbus, Ohio 43229-6693

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CERTIFIED	EXPIRATION
January 6, 2011	January 6, 2016

DATE OF FIELD AUDIT
September 17-19, 2012
DATE OF LAST UPDATE
January 8, 2013

Organization of the Report

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

FOREWORD

Cycle in annual surveillance audits			
<input type="checkbox"/> 1 st annual audit	<input checked="" type="checkbox"/> 2 nd annual audit	<input type="checkbox"/> 3 rd annual audit	<input type="checkbox"/> 4 th annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
Ohio Department of Natural Resources, Division of Forestry (ODNR)			

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing compliance with the requirements and standards of certification. A public summary of the initial evaluation is available on the SCS website www.scscertified.com.

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

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for a summary those CARs and their disposition as a result of this annual audit);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to the audit; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

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SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Annual Audit Team

Auditor Name:	Brendan Grady	Auditor role:	Lead auditor FSC
Qualifications: Mr. Grady is the Director, Forest Management Certification at SCS. Previously he served as a Certification Forester with SCS. In these roles, he has participated as a team member and leader in forest certification audits throughout the United States, Europe, and Southeast Asia. Brendan has a B.S. in Forestry from the University of California, Berkeley, and a Juris Doctorate from the University of Washington School of Law. Brendan is a member of the State Bar of California, and was an attorney in private practice focusing on environmental law prior to his current role.			
Auditor Name:	Jerry Grossman	Auditor role:	Lead auditor SFI
Qualifications: Gerald Grossman is President of Grossman Forestry Company, a full service consulting forestry company, managing over 330,000 acres and employing 7 full time foresters in Newberry Michigan. He has a BS in Forestry from the University of Michigan and graduate degrees in Forestry and Business Administration from Michigan State University. He is a tree farmer and past president / current trustee of the Tahquamenon Area School Board of Education. He is chair of the Michigan Forest Stewardship Advisory Committee, a member of the Michigan Timber Advisory Council and a member of the American Forest Foundation's certification committee. He has led or participated in over 55 certification audits in 15 states.			

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	2.5
B. Number of auditors participating in on-site evaluation:	2
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	2
D. Total number of person days used in evaluation:	7

1.3 Standards Employed

1.3.1. – Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC-US Forest Management Standard	V1-0	July 8, 2010
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Forest Conservation Program homepage (www.scscertified.com/forestry). Standards are also available, upon request, from Scientific Certification Systems (www.scscertified.com).		

2.0 ANNUAL AUDIT DATES AND ACTIVITIES

2.1 Annual Audit Itinerary and Activities

Date: September 17, 2012	
FMU/Location/ sites visited	Activities/ notes
ODNR Headquarters, Columbus	<ul style="list-style-type: none"> • Opening Meeting • Review of open CARs/OBSs, management activities, and documentation.
Maumee State Forest (North Team - Grady)	<ul style="list-style-type: none"> • "Muck Farm" GLRI Restoration Area. Restoration of a wet meadow site through removal of buckthorn and other competing shrubs. High Conservation Value Forest site. • Discussion of cooperative efforts at conservation in Oak Openings Region. • Planned timber harvest in areas bordering wetland restoration area. Goal is restoration of an open oak savannah stand, underrepresented in region compared to historical conditions • ATV recreation area; recent expansion of trail system • Tornado rehabilitation area, acorn seeding and invasive weed control
Tar Hollow State Forest (South Team - Grossman)	<ul style="list-style-type: none"> • E8 & E9 – Active timber sale (Perkins Wood Products) – James Perkins (confirmed Master Logger Status good until 11/1/13). Sale was sold to Glatfelter under supply agreement. Sale is within Grouse Management Unit. Reviewed Timber Harvest NOI, and Cutting & Logging Inspection reports. Walked to closed out unit. Water bars are in place. Standing dead was left. Good utilization. • E-1 & M-1 (merchandising) – Deferment harvest. Left 10 sq. ft. / acre... Done last year. Seeded and mulched. Water bars are done properly and functional. Good utilization. • A7 – Bid sale sold 12/2010. Jim Bray logging (confirmed master logger status good until 12/1/12), Started 4/6/11. Reviewed cutting and logging inspection reports. Damage trees were deemed to be excessive and double stumpage assessed. After damage trees were harvested, sale looked very good. Water bars and seeding was very good.
Date: September 18, 2012	
FMU/Location/ sites visited	Activities/ notes
Mohican Memorial State Forest (North Team - Grady)	<ul style="list-style-type: none"> • Discussion of law enforcement activities on State Forests • Ohio Memorial Shrine; cultural site • Gas pipeline easement, maintenance of right of ways around

	<p>existing gas pumps and along buried pipelines; recent clearing of trees and other vegetation, negotiation over buffer widths.</p> <ul style="list-style-type: none"> • Discovery Forest, silviculture demonstration area intended to be resource for woodlot owners in the region.
Harrison State Forest	<ul style="list-style-type: none"> • Inspection of harvesting equipment • Logging contractor interview • Partially completed Dragon Back sale. Three cutting sections, two clearcut, one selection cut favoring oak regeneration. Low amount of residual stand damage and topsoil disturbance. • Watercourse crossing maintenance and repair after hauling was completed.
Yellow Creek State Forest	<ul style="list-style-type: none"> • Catlett tract sale; clearcut in planted white pine stand with aim to return site to native hardwood forest. • Inspection of rutting. Sale had been shut down due to violating wet weather policy, then reopened after appeal with extra mitigation measures in order to finish before rainy season began.
Tar Hollow State Forest (South Team – Grossman)	<ul style="list-style-type: none"> • AEP Special Use Permit - AEP major transmission line upgrade. Reviewed special use permit (SUP 1226). Roads upgraded for access to transmission line. Very high standard with silt fence and lots of gravel on roads. This project is in progress. All road work looked very good. • Clark Hollow Prescribe Burn Site – site is planned for prescribed burn and waiting for good weather conditions. Reviewed burn plan and prescription. Consistent with field observations. • B-6 – Contractor marked shelterwood harvest. Sale has not been sold. Reviewed prescription and marking was consistent with the prescription. • New Culvert -- looked at new culvert. Installed properly and functional. Discussed road maintenance and monitoring. • B19 – C19 – Site is above a horse camp. Reviewed contract and inspection reports. Selection harvest with some erosion on main road. Skid roads within sale are seeded and have water bars. Main road has horse use and will need some maintenance. Look fine for now, but obvious horses are knocking down broad based dips. Sale was completed 9/21/11. • In office on Wed. reviewed “certification road and trail inspection rotation” Tar Hollow State Forest. 5 year rotation. Informal 1 year review. But 5 year formal inspection data sheet. Reviewed “ODF Road & Trail Data Sheet” – This road is up for review in FY 2013. • Rip-Rap project - Looked at site near old office complex. Rip Rap project started to rip-rap sections of road to stabilize ditch. Part of ODOT cooperative (ODOT supplied material & DOF labor). Project looks good so far.
Scioto Trail State Forest	<ul style="list-style-type: none"> • E2 (FSA / Merch.) - Gladfelter harvest – harvested pulpwood and low value logs. Gladfelter sale is closed, but prescription is

	<p>still open as high value logs still need to be harvested. Galdfelter did BMP work and looks good. Reviewed cutting and logging inspection forms. Concern regarding rutting policy and reviewed. Sale was skid with a forwarder and for a stretch (100 feet plus) from the landing there were ruts. Reviewed chapter 8 in Land Management Manual – wet weather logging guidelines. Agreed that would be moderate and not a BMP issue. When sale is completed this winter ruts can easily be smoothed out, which is the intent.</p> <ul style="list-style-type: none"> • Check Redoutey Logging - checked master logger status --- 4 members good until 12/1/12. • E2 Stumpage Reviewed contract and has BMP clause. James Bray contractor (Master logger). Started 12/29/11 and closed 1/6/12. Very few damage trees. Looked very good. • C-13 Bid sale (prospectus 2/7/11). Bought by Ohio Valley Veneer and harvested by Pfeifer lumber (Brian Pfeifer master logger through 5/1/13). Started 12/8/11 and stopped by bad weather. Waited to do BMP work and closed 6/28/12. Was clear cut with leave groups. Looked good. • Merchandising Yard – no activity in yard (not season). Reviewed process / procedures. • BMP training site: Field site used bi-annually for BMP training. Examples of good and bad techniques as training. Great to have dedicated site for BMP training (support for logger training). • C-5 Merch. – Adjusted sale specifications from plan to account for improved visuals. 94 acre thinning. Started 3/2/125 and finished 4/11/12. Harvested by Perkins. Excellent BMP establishment. • B-3 – Galdfelter sale. Deferment harvest / aesthetic shelterwood. 45 acre sale started 1/5/12 and done 2/22/12. modified to increase road buffer. Site looked very good.
<p>Date: September 19, 2012</p>	
<p>Chillicothe Office (South Team)</p>	<ul style="list-style-type: none"> • Reviewed regen work – Silva Oak protocol for regen. After 1st burn: when getting ready for another burn. • 6 ft fixed radius plot, 26’ interference plot 20 BAF overstory. • Looked at example Tar Hollow Brush Ridge Burn Unit Plots (raw data). • Reviewed file for completed burn in Comp B-4 on Richland Furnace State Forest (Burn Unit RF 2011)– as part of USFS research. Pre burn checklist and crew briefing from 4/6/12. Greg Guess. Checked Greg Guess training records. • Reviewed Pre-commercial Project Proposal and prescription forms from FY 2011. • 2010 – 2011. Flew Tar Hollow for Ailanthus and identified hot spots. Prescribed hack/squirt or cut spray. Planned. Also every day in field “record of pesticide application” Ohio law needs

	one crew leader as commercial applicator license. Others minimum "service person."
ODNR Headquarters	<ul style="list-style-type: none"> • Additional documentation and record review; examination of title and deed documentation for state forests • Closing meeting

3.0 CHANGES IN MANAGEMENT PRACTICES

There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies. The main new initiative on DNR lands is planning for expected development of natural gas resources now made economical through hydraulic fracturing (fracking), although none has occurred on DNR land.

4.0 RESULTS OF THE EVALUATION

4.1 Existing Corrective Action Requests and Observations

Finding Number: 2011.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator: FSC-US indicator 7.3.a	
Non-Conformity: Interviews with new forester Dale Egbert did not show systematic implementation of an approach for training new staff. Dale himself is an experienced forester (only new to DOF) so training is less crucial. However it did reveal an opportunity to improve DOF's training efforts.	
Corrective Action Request: Procedures for ensuring that new employees receive adequate training could be improved to ensure proper implementation of the management plan.	
FME response (including any evidence submitted)	ODNR developed a new forester training checklist, identifying required trainings for new field staff. As part of the training ODNR also updated their training record system, borrowing the IQS system from the fire world to track staff trainings.
SCS review	The audit team reviewed training logs for ODNR staff, including a forester hired since the last audit (Robert Boehle). The team was satisfied that the new system addresses the weakness identified at the previous audit.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

4.2 New Corrective Action Requests and Observations

Finding Number: 2012.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator: FSC-US indicator 8.3.a	
Non-Conformity: Timber sale documentation (sale advertisements, contracts) use the claims "FSC Pure" and "100% FSC Pure," instead of the correct claim: FSC 100%.	
Corrective Action Request: FME must ensure that its use of the FSC claim is updated to current language.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2012.2	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator: FSC-US indicator 6.10.c	
<p>Background: ODNR is investigating development of gas rights on state forest lands, although no new gas extraction facilities have been developed. In particular, extraction using hydraulic fracturing (or fracking) will require installation of concrete pads and associated equipment up to approximately 5 acres each. This activity would constitute a conversion of forestland to non-forest use, and thus is permissible only if it meets the test in Criterion 6.10. Planned fracking pads would be limited in total area and would not be placed in HCVF areas. However it is unclear how the proposed conversion would result in "clear, substantial, additional, secure, long term forest conservation benefits across the FMU," as required by the standard.</p>	
<p>Observation: Prior to construction of any fracking pads, ODNR should consider how the forest conversion will result in additional conservation benefits.</p>	
FME response (including any evidence submitted)	

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

Finding Number: 2012.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator: FSC-US indicator 9.4.a	
Background: While planning additional ATV trails on Maumee state forest, trails were laid out to avoid an area of oak savannah marked by the forest manager as “potential HCVF.” Trails were also laid out to avoid a designated lupine HCVF site. After the initial HCVF assessment and designation was conducted prior to certification, there does not appear to be a clear way to evaluate newly identified sites such as this one for formal designation (or rejection) of HCVF status.	
Observation: ODNR should develop a system for assessing whether additional areas on the forest should receive HCVF designation.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

5.0 STAKEHOLDER COMMENTS

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

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

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

5.1 Stakeholder Groups Consulted

Environmental NGOs	Logging Contractors
Log Purchasers	

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

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

Box 6.1 – Summary of Stakeholder Comments and Responses from the Team Where Applicable	
Stakeholder comments	SCS Response
Environmental concerns	
Concerns have been raised about the potential that some area of Ohio state forests would be converted to oil and gas development.	This concern was originally raised after last year’s surveillance audit and continues to be a potential issue since to oil and gas development has occurred yet. OBS 2012.2 was issued in response to potential effects.
DOF’s restoration efforts on Maumee state forest contribute to important landscape conservation goals.	Noted as evidence of conformance.

6.0 CERTIFICATION DECISION

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

7.0 CHANGES IN CERTIFICATION SCOPE

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

8.0 ANNUAL DATA UPDATE

8.1 Social Information

Social Information		
Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender): workers		
of male workers <u>76</u>	of female workers <u>19</u>	
Number of accidents in forest work since last audit	Serious	Fatal
	# 0	# 0

8.2 Annual Summary of Pesticide And Other Chemical Use

Commercial name of pesticide/ herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year	Reason for use
Arsenal	Imazapyr	0.25 Gallons	1 acre	Invasive Species Control
Garlon	Triclopyr	150 Gallons	50 acres	Invasive Species Control
Pathway	Picloram	0.5 Gallons	2 acres	Invasive Species Control
Roundup, Rodeo	Glyphosate	2 Gallons	36 acres	Herbaceous Weed Control

SECTION B – APPENDICES (CONFIDENTIAL)**Appendix 1 – List of FMUs Selected For Evaluation**

- FME consists of a single FMU
 FME consists of multiple FMUs

Appendix 2 – Evaluation of Management Systems

The audit team initiated stakeholder consultation with regulators, adjacent landowners, and Environmental NGOs prior to the field assessment. Team members also consulted with FME staff on the scope of the assessment, changes in scope, and site selection. Selected FSC P&C for review were divided between the two team-members based on previous experience with the FME. The audit team chose sites based on current and past stakeholder consultation, as well as areas of active harvest in units that have not been visited in a long time. Interviews with herbicide application workers were conducted in Spanish for ease of communication. Sites visited included active and completed THPs, herbicide applications, and protected areas.

Appendix 3 – List of Stakeholders Consulted**List of FME Staff Consulted**

Name	Title	Consultation method
Chad Sanders	Land Management – North	Interview/Field Consultation
Gregg Maxfield	Northern District Forest Manager	Interview/Field Consultation
Mike Bowden	Fire Program Coordinator	Interview/Field Consultation
Greg Guess	Southern District Land Management Coordinator	Interview/Field Consultation
Nate Jester	District Forester – South	Interview/Field Consultation
Dan Balser	Assistant Chief	Interview/Field Consultation
Cotton Randall	Special Projects Administrator	Interview/Field Consultation
John Bauerbach	DOF Forester	Interview/Field Consultation
Brian Kelly	DOF Forest Manager	Interview/Field Consultation
Chris Kerr	DOF Forest Tech	Interview/Field Consultation
Matt Rogers	State Ranger	Interview/Field Consultation
Gene Wells	Real Estate Administration	Interview/Field Consultation
Don Schmenke	DOF Forest Manager	Interview/Field Consultation
Eric Traczyk	DOF Road Department	Interview/Field Consultation

List of other Stakeholders Consulted

Name/ Title	Organization	Consultation method
Steve Woods	The Nature Conservancy	Interview/Field Consultation
Greg Lipps	Independent Biologist	Interview/Field Consultation
Tony Machumer	Superior Hardwoods (log purchaser)	Interview/Field Consultation
Roland Fletcher	Logger	Interview/Field Consultation

Appendix 4 – Additional Audit Techniques Employed

No additional audit techniques were employed.

Appendix 5 – Pesticide Derogations

There are no active pesticide derogations for this FME.

Appendix 6 – Detailed Observations

Evaluation year	FSC P&C Reviewed
2010	All – Certification Evaluation
2011	1.5, 2.3, 3.2, 4.2, 4.4, 4.5, 5.6, 6.1, 6.2, 6.3, 6.5, 6.9, 7.1, 7.2, 7.3, 7.4, 8.1, 8.2, 8.3, 9.1, and 9.4
2012	P1, P2, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.9, 8.2, 9.4
2013	
2014	

C= Conformance with Criterion

NC= Non-Conformance with Criterion

NA = Not Applicable

NE = Not Evaluated

REQUIREMENT	C/N/C	COMMENT/CAR
P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
C1.1 Forest management shall respect all national and local laws and administrative requirements.	C	List of applicable laws are found in Land Management manual. DOF itself is a government agency subject to specific regulatory requirements. Soil and water districts also have regulatory authority of DOF's actions in areas like non-point source water pollution. No regulatory violations were reported.
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	DOF is exempt from some taxes as state agency. However some fees are paid, including a revenue sharing agreement with local government (65% of net revenue goes to county in which the state forest is located). Audit team reviewed summary of timber

		revenue distributions. DOF also has an internal accounting system following GAAP procedures.
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	List of binding international agreements present in land manual. No observed or reported violations of any agreements.
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	No conflicts have yet arisen. It is the policy of DOF to refer them to SCS if a legal conflict does arise.
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	<p>DOF has a fully funded Law Enforcement and Recreation program. Commissioned officers regularly patrol state forests. (State Ranger Matt Rogers was interviewed as part of this audit.) Although they are ODNR employees, they commissioned to enforce any laws with the same jurisdiction as local law enforcement. In addition, DOF pools resources with local law enforcement agencies.</p> <p>Most commonly reported illegal activities on the state forests are drinking, drug use, and illegal recreation. The mix of unauthorized activities varies somewhat in the northern region closer to the larger state population areas.</p> <p>Signs and gates were regularly observed to be utilized on the state forests during the field audit.</p>
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	C	ODNR has a publicly available commitment to certification on their website. All DOF lands are under the scope of the certificate. DOF has maintained staff support of certification despite budgetary cuts, demonstrating their commitment to the FSC in a practical manner.
P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	C	<p>All land managed by DOF is held in fee simple by the State of Ohio. A dedicated real estate office handles all deed issues and transactions. Deed records were reviewed by the audit team for Vinton Furnace Demonstration state forest, the most recent addition to the state forest system.</p> <p>Boundaries are identified on the ground and neighboring property owners are notified prior to timber harvesting. State boundaries are repainted every 5 years on a rotating basis by the DOF law enforcement staff.</p>
C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest	C	Local communities have access rights to the state forest for recreation, which DOF actively manages. One complaint was logged with DOF relating to access on

<p>operations unless they delegate control with free and informed consent to other agencies.</p>		<p>Shawnee State forest. In particular a local community group wanted keys to be able to unlock gates on forest roads for easier motor vehicle access, but this request was denied due to restrictions on use of motor vehicles.</p> <p>There is a second category of use-rights on the forest related to oil and gas development. No development has yet occurred, but the real estate department is actively mapping state lands to determine on what land the state holds mineral rights, and where the rights were severed and held by some other party.</p>
<p>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	<p>C</p>	<p>There were no significant disputes over tenure. However, any that did occur would be documented extensively as part of the court process.</p>
<p>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p>		
<p>C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	<p>C</p>	<p>As part of the certification process, ODNr has engaged in active outreach to tribes seeking input on management, although there has not been significant response.</p> <p>Formal training for the forestry staff was held in the past on interacting with tribes. Ongoing distribution of information continues, although there has been little interest on the part of local American Indian groups, recognized or not.</p>
<p>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</p>		
<p>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	<p>C</p>	<p>Evidence of safety concerns by DOF foresters include an agency hazard reduction program, monthly safety meetings, and a safety officer dedicated to each unit.</p> <p>Standard contract requires use of personal protective equipment. Audit team reviewed contract with R&R Logging. Also, master logger status is required for contractors (which has a safety component).</p>
<p>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</p>	<p>C</p>	<p>DOF holds open houses in order to educate the public about their management activities. Three were held last year, one covering the southern district forests, one covering Maumee state forest in the northwest, and one covering Mohican and the eastern forest. Reports from the open houses are taken into account at management review meetings.</p>

		<p>Direct neighbors are notified prior to site disturbing activities and post cards are mailed prior to fire treatments. Public notices were reviewed by the team, included in all harvest planning documentation.</p> <p>An appeal process has been developed which allows an initial path for dispute resolution prior to engaging the court system. http://ohiodnr.com/Default.aspx?tabid=22749</p> <p>This appeal process was used by a complainant regarding public access on Shawnee state forest. The issue has apparently been resolved, but will be revisited in future audits.</p>
<p>P5 Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p>		
<p>C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	<p>C</p>	<p>Actual volume sold was 10.7 million board feet, or roughly 28% of growth. DOF targets harvesting at 40% of growth, distributed across the whole state forest system. Inventory projections are based on an initial inventory done in 2008, with updates done periodically when cruises occur as part of timber management activities.</p> <p>DOFs harvest efforts are in line with their Desired Future Condition, namely increasing the presence of oak in throughout the forest. This strategy is to combat the increase in shade tolerant maples that has occurred over the past century displacing higher valued species. The increase in harvest level, naturally favoring more shade intolerant oaks, furthers this goal.</p>
<p>P6 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.</p>		
<p>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>	<p>C</p>	<p>RTE species are regularly taken into account during the development of management plans.</p> <p>DOF relies on expertise from its sister agency within ODNR, the Division of Wildlife. DOW reviews the annual work plans for the state forests, and then comments on individual harvest plans as necessary. DOW biologists may request a site visit at their discretion, and offer comments on harvesting practices in order to protect rare, threatened and endangered species.</p> <p>Protection of rare biological communities is also listed as one of DNR’s primary landscape level protection goals. Examples include the wet meadow restoration at Maumee State forest in the biologically unique Oak</p>

		Openings region in Northwest Ohio.
C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	<p>The audit team has found adequate overall conformity with this Criterion.</p> <p>ODF has landscape level goals aimed at promoting underrepresented successional stages. In particular there is a focus on recruiting oak forests.</p> <p>Rare ecological communities are protected when identified, such as wet meadows.</p> <p>DOF does not manage any forests that meet old growth definitions due to the land use history in Ohio. Certain state forests have RSA and other reserve areas dedicated to old growth recruitment.</p> <p>Stream side management zones are in place conforming to the Appalachian regional guidelines.</p> <p>DOF Land Management Manual includes legacy tree and retention standards. Observations in the field show that these were followed.</p> <p>Invasive species management is an ongoing effort. Temporary crews are managed through the Ohio Woodland Job Corps.</p>
C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	DOF does not actively use exotic species. Some legacy plantations of pine species not native to the site exist, but they are being phased out through even aged harvests. Former plantations are being regenerated to native hardwood forest.
<p>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</p> <ul style="list-style-type: none"> a) Entails a very limited portion of the forest management unit; and b) Does not occur on high conservation value forest area; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit. 	C	DOF is currently analyzing how to explore gas rights on state forests that are now able to be extracted using hydraulic fracturing (i.e. fracking). Mineral rights maps are being prepared for each state forest (the team reviewed the mineral rights map for Sunfish Creek). Installation of fracking pads can take up several acres, and would result in conversion. OBS 2012.2 was issued in response. DOF will need to be able to demonstrate how the three part test for conversion in 6.10 is met.
C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	<p>OBS 2011.1 had been issued. Interviews with new forester Dale Egbert did not show systematic implementation of an approach for training new staff</p> <p>ODNR developed a new forester training checklist, identifying required trainings for new field staff. As</p>

		<p>part of the training ODNR also updated their training record system, borrowing the IQS system from the fire world to track staff trainings. The audit team reviewed training logs for ODNR staff, including a forester hired since the last audit (Robert Boehle). The team was satisfied that the new system addresses the weakness identified at the previous audit.</p>
<p>P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</p>		
<p>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</p>	<p>C</p>	<p>The audit team has found adequate overall conformity with this Criterion.</p> <p>Monitoring efforts include the compartment review process, GIS analysis, G&Y, logging inspections, forest health monitoring, and program reports. DOF also supports a variety of ongoing specialized research and monitoring activities at Vinton Furnace State Experimental Forest. Stakeholder comments on DOF management are monitored primarily through open houses and tracking of comments.</p> <p>Audit team reviewed records related monitoring of timber harvests, costs and productivity associated with management, post-harvest monitoring checklists, and road maintenance monitoring forms.</p> <p>Recent examples of more in depth monitoring include a study in journal of wildlife management analyzing the effects of shelterwood harvests on bird communities, which was conducted primarily on DOF managed land.</p>
<p>P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ul style="list-style-type: none"> a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). 		
<p>C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	<p>C</p>	<p>Monitoring of HVCF is now being conducted on an annual basis. The team reviewed monitoring reports from HCVF areas: Beaver Creek, Racoon Creek-Hewett Run, and Shaw Hollow.</p> <p>OBS 2012.3 was issued. While planning additional ATV</p>

		<p>trails on Maumee state forest, trails were laid out to avoid an area of oak savannah marked by the forest manager as “potential HCVF.” Trails were also laid out to avoid a designated lupine HCVF site. After the initial HCVF assessment and designation was conducted prior to certification, there does not appear to be a clear way to evaluate newly identified sites such as this one for formal designation (or rejection) of HCVF status. ODNR should develop a system for assessing whether additional areas on the forest should receive HCVF designation.</p>
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Appendix 7 – Chain of Custody Indicators for FMEs

Chain of Custody indicators were not evaluated during this annual audit.