

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

Ohio DNR Division of Forestry

Columbus, Ohio, USA

SCS-FM/COC-00130N

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CERTIFIED	EXPIRATION
6 January 2016	5 January 2021

DATE OF FIELD AUDIT
26-29 Oct 2015
DATE OF LAST UPDATE
17 December 2015

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Foreword

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

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

Organization of the Report

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

Table of Contents

- SECTION A – PUBLIC SUMMARY 4
- 1. GENERAL INFORMATION 4
 - 1.1 Certificate Registration Information 4
 - 1.7 Conversion Table English Units to Metric Units..... 10
- 2. DESCRIPTION OF FOREST MANAGEMENT 11
 - 2.1 Management Context 11
 - 2.2 Forest Management Plan..... 15
 - 2.3 Monitoring System..... 17
- 3. CERTIFICATION EVALUATION PROCESS 18
 - 3.1 Evaluation Schedule and Team 18
 - 3.2 Evaluation of Management System 28
 - 3.3 Stakeholder Consultation Process 28
- 4. RESULTS OF THE EVALUATION 47
 - 4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C..... 47
 - 4.2 Process of Determining Conformance 49
- 5. CERTIFICATION DECISION 66
- SECTION B – APPENDICES (CONFIDENTIAL) 68
 - Appendix 1 – Current and Projected Annual Harvest for Main Commercial Species 68
 - Appendix 2 – List of FMUs Selected for Evaluation 68
 - Appendix 3 – List of Stakeholders Consulted..... 68
 - Appendix 4 – Additional Evaluation Techniques Employed 69
 - Appendix 5 – Certification Standard Conformance Table 70
 - Appendix 6 – Tracking, Tracing and Identification of Certified Products 137

SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Certificate Registration Information

1.1.1.a Name and Contact Information

Organization name	Ohio Department of Natural Resources (ODNR)-Division of Forestry		
Contact person	Chad Sanders		
Address	ODNR-Division of Forestry 945 ODNR Mohican Rd., 60 Perrysville, OH 44864	Telephone	419.938.6222 ext 13
		Fax	419.938.3104
		e-mail	Chad.Sanders@dnr.state.oh.us
		Website	http://www.dnr.state.oh.us

1.1.1.b FSC Sales Information

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

1.1.2 Scope of Certificate

Certificate Type	<input checked="" type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)	n/a	
Number of FMU's in scope of certificate	1 FMU, divided into 21 "state forest" units totaling 200,056 acres.	
Geographic location of non-SLIMF FMU(s)	Latitude: 82deg 57' 55.45" West Longitude: 40deg 03' 33.61" North	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is:		Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac

privately managed	0		
state managed	200,056 acres		
community managed	0		
Number of FMUs in scope that are:			
less than 100 ha in area	0	100 - 1000 ha in area	0
1000 - 10 000 ha in area	0	more than 10 000 ha in area	1
Total forest area in scope of certificate which is included in FMUs that:			Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac
are less than 100 ha in area	0		
are between 100 ha and 1000 ha in area	0		
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0		
Division of FMUs into manageable units:			
State Forest Units	District	Administrative Office	Acreage
BEAVER CREEK STATE FOREST Total	North		1,107
BLUE ROCK STATE FOREST Total	South	X	4,535
BLUE ROCK WEST Total	South		689
BRUSH CREEK STATE FOREST Total	South		13,634
CHAPIN FOREST RESERVATION Total	North		369
DEAN STATE FOREST Total	South	X	2,828
FERNWOOD STATE FOREST Total	North	X	3,035
GIFFORD STATE FOREST Total	South		314
GREEN SPRINGS STATE NURSERY Total	North		119
HARRISON STATE FOREST Total	North		1,363
HOCKING STATE FOREST Total	South	X	9,277
MARIETTA STATE NURSERY Total	South		98
MAUMEE STATE FOREST Total	North	X	3,118
MOHICAN-MEMORIAL STATE FOREST Total	North	X	4,633
PERRY STATE FOREST Total	South		4,639
PIKE STATE FOREST Total	South		11,980
RICHLAND FURNACE STATE FOREST Total	South		2,504
SCIOTO TRAIL STATE FOREST Total	South	X	9,546
SHADE RIVER STATE FOREST Total	South		2,973
SHAWNEE STATE FOREST Total	South	X	64,427
SUNFISH CREEK STATE FOREST Total	South		657
TAR HOLLOW STATE FOREST Total	South		16,318
VINTON FURNACE EXPERIMENTAL STATE FOREST Total	South	X	12,332
YELLOW CREEK STATE FOREST Total	North		749
ZALESKI STATE FOREST Total	South	X	28,614
ZANESVILLE STATE NURSERY Total	South		198
Grand Total			200,056
21 State Forests, 3 Nursery Properties, 1 Forest Reservation managed by 3rd party			

1.2 FSC Data Request

1.2.1 Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	164,556 acres
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	0
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	164,556 acres
Silvicultural system(s)	Area under type of management
Even-aged management	2420 acres
Clearcut (clearcut size range)	1216 acres per year
Shelterwood	566 acres
Other:	638 acres of intermediate treatments (thinning, or improvement harvests) per year average.
Uneven-aged management	128 acres
Individual tree selection	109 acres
Group selection	19 acres
Other:	0
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	0
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	0
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
<p>The Ohio DOF has estimated the annual growth of timber on state forests based on collected inventory data on eight of the largest state forests completed in 2009 and on data from the Forest Inventory and Analysis data for the remaining state forests. These data were processed through the Forest Vegetation Simulator (FVS) publicly available growth model to determine growth rates across the system and at each state forest. The Ohio DOF harvests timber in order to meet their state biodiversity goals (document: State Forest 5-year Management Plan) and has limited harvest levels to no more that 40%</p>	

of the calculated growth volume (document: DOF Sustainable Harvest Limit).

Species in scope of joint FM/COC certificate: *Scientific/ Latin Name (Common/ Trade Name)*

Eastern White Pine, *Pinus strobus*
 Red Pine, *Pinus resinosa*
 Pitch Pine, *Pinus rigida*
 Shortleaf Pine, *Pinus echinata*
 Virginia Pine, *Pinus virginiana*
 Tamarack, *Larix laricina*
 Eastern Hemlock, *Tsuga canadensis*
 Eastern Red Cedar, *Juniperus virginiana*
 Sugar Maple, *Acer saccharum*
 Boxelder, *Acer negundo*
 Red Maple, *Acer rubrum*
 Silver Maple, *Acer saccharinum*
 Black Maple, *Acer nigrum*
 White Ash, *Fraxinus americana*
 Black Ash, *Fraxinus nigra*
 Green Ash, *Fraxinus pennsylvanica*
 Yellow Buckeye, *Aesculus octandra*
 Ohio Buckeye, *Aesculus glabra*
 Black Walnut, *Juglans nigra*
 Butternut, *Juglans cinerea*
 Bitternut Hickory, *Carya cordiformis*
 Mockernut Hickory, *Carya tomentosa*
 Shellbark Hickory, *Carya laciniata*
 Shagbark Hickory, *Carya ovata*
 Pignut Hickory, *Carya glabra*
 Honey Locust, *Gleditsia triacanthos*
 Black Locust, *Robinia pseudoacacia*
 Sassafras, *Sassafras albidum*
 Hackberry, *Celtis occidentalis*
 Eastern cottonwood, *Populus deltoides*
 Bigtooth Aspen, *Populus grandidentata*
 Black Cherry, *Prunus serotina*
 American Beech, *Fagus grandifolia*
 Northern Red Oak, *Quercus rubra*
 Scarlet Oak, *Quercus coccinea*
 Pin Oak, *Quercus palustris*
 Black Oak, *Quercus velutina*
 White Oak, *Quercus alba*
 Chestnut Oak, *Quercus prinus*

1.2.2 FSC Product Classification

Timber products

Product Level 1	Product Level 2	Species
W1	W1.1 Roundwood	All
W5 Solid wood (sawn, chipped, sliced or peeled)		All
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
n/a		

1.2.3 Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives		16,156 ac		
High Conservation Value Forest/ Areas				
High Conservation Values present and respective areas:			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac	
	Code	HCV Type	Description & Location	Area
<input checked="" type="checkbox"/>	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Cantwell Cliffs area Pine Cr / Conkles Hollow / Crane Hollow Muck Farm prairie remnant Raccoon Creek Bottom Shawnee Wilderness Area Snake Hollow Rock Run	5130 ac
<input checked="" type="checkbox"/>	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.	Raccoon Creek Bottom Muck Farm prairie remnant Shawnee Wilderness Area Oak Openings Restoration	2809 ac
<input checked="" type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Shawnee Wilderness Area Oak Openings Restoration Mohican zone A - Old Growth Mgmt Mohican zone B- Old Growth Mgmt Mohican zone B - Future Old Growth Mgmt	6639 ac
<input checked="" type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Beaver Creek watershed Cantwell Cliffs area Pine Cr / Conkles Hollow / Crane Hollow Raccoon Creek Bottom	1571 ac

<input checked="" type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	Cultural area	7 ac
<input type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total Area of forest classified as 'High Conservation Value Forest/ Area'				16,156 ac

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

<input checked="" type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
Explanation for exclusion of FMUs and/or excision:		
Control measures to prevent mixing of certified and non-certified product (C8.3):		
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input type="checkbox"/> ac)

1.4 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):	
85 male workers	17 female workers

1.5 Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
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	10 gallons	42 acres	Invasive and brush control
Garlon	Triclopyr	20 gallons	63 acres	Invasive and brush control

Glyphosate	Glyphosate	27 gallons	135 acres	Herbaceous weed control
Escort	Metsulfuron methyl	6 ounces	2 acres	Weed and brush control

1.6 Standards Used

1.6.1 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 Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSglobalServices.com).		

1.7 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	To	multiply by
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft)	Meter (m)	0.3048
Yard (yd)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	To	multiply by
Square foot (sq ft)	Square meter (m ²)	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	To	multiply by
Cubic foot (cu ft)	Cubic meter (m ³)	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

2. Description of Forest Management

2.1 Management Context

2.1.1 Regulatory Context

Pertinent Regulations at the National Level	Endangered Species Act Clean Water Act (Section 404 wetland protection) Occupational Safety and Health Act National Historic Preservation Act Archaeological and Historic Preservation Act Americans with Disabilities Act U.S. ratified treaties, including CITES Lacey Act
Pertinent Regulations at the State / Local Level	Ohio Revised Code Chapter 1503 – Division of Forestry Ohio Revised Code Chapter 1501.5 – Agricultural Pollution Abatement Ohio Revised Code Chapter 1518 – Rare Species Ohio Revised Code Chapter 1531.25 – Rare Species Ohio Revised Code Chapter 921 – Pesticides Ohio Revised Code Chapter 149.51 – Desecration of known archaeological sites. Ohio Revised Code Chapter 1509 – Oil and Gas Drilling. Ohio Administrative Code Chapter 1501.3 – Forest Rules. Ohio Administrative Code Chapter 901 – Dept of Agriculture rules. Ohio Fence Law Ohio Ditch Law

Regulatory Context Description

In 1949, the Ohio Legislature created the Department of Natural Resources. “At that time, the department was charged with the responsibility of formulating and putting into execution a long term comprehensive plan and program for the development and wise use of the natural resources of the state, to the end that the health, happiness and wholesome enjoyment of life of the people of Ohio may be further encouraged” (<http://ohiodnr.gov/home/history-purpose>). The ODNR has eight divisions, of which one is the Division of Forestry (DOF).

The ODNR Division of Forestry operates and maintains Ohio’s 21 state forests, encompassing nearly 200,000 acres. Ohio’s state forests offer visitors more than 350 miles of back country bridle trails, more than 80 miles of backpack trails, many day-use hiking and mountain biking trails, as well as camping, hunting, wildlife viewing and

gathering places. Four designated all-purpose vehicle areas on state forest land are open for off-road four-wheeler and motorcycle riding.

In addition to offering recreational opportunities, the ODNR Division of Forestry manages Ohio’s vast forest resources and promotes wise use and sustainable management assistance to public and private landowners throughout the state. The division’s duties include forest health management, state forest land management, and fire protection and service forestry assistance (ODNR 2015 Annual Report, p. 14).

The Ohio Revised Code chapter 1503 sets forth the responsibilities and duties of the Division of Forestry. This chapter includes all duties of the division including private land assistance, urban forestry, nurseries, fire protection, as well as the development and management of state forests. The chapter gives the Chief of the Division the authority to sell timber on state forests, enter into agreements with other governmental and non-profit agencies, commission forest officers and fire wardens, and enter into lease agreements with private entities for concessions. The revenue distribution formula for timber sales is detailed in the chapter. It also includes the legal framework for the Forest Advisory Council and Mid-Atlantic Fire Compact. The Shawnee Wilderness Area’s location is defined and its statutory rules are also listed in this chapter.

The Ohio Administrative Code chapter 1501.3 sets forth all of the “forest rules” by which visitors may recreate on state forest land. 1501.3 details the rules for visitation, camping, special use permits, concessions, signage, firearms, and motor vehicles. The details of the APV area use rules are also in this section of code. All state forest managers and law enforcement should be well trained on this section of code. (ODOF Land Management Manual, Ch 1, p. 6-7).

2.1.2 Environmental Context

Environmental safeguards:
The Ohio DNR-Division of Forestry has environmental safeguards in place through several programs mostly outlined in their Land Management Manual (LMM). These programs are considered policy and all state foresters are trained and obligated to implement these programs. This manual includes a description of how all state forests are delineated into one of 5 major conservation zones that have defined management objectives. Ohio DOF has programs in place for the protection of soil and water resources, to protect streamside management zones, to address wet-weather logging, to conserve legacy trees and old growth forests, and to protect special sites and species. Ohio DOF relies on the Ohio Biodiversity Database to for locations of rare, threatened, and endangered species. Further, Ohio DOF has completed a High Conservation Value Forest Assessment and a Representative Sample Area Assessment for the entire FMU.
Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:
Ohio DOF relies on landscape level data such as LANDFIRE, USFS Forest Inventory and Analysis Program, and other in-house assessments to determine assessments of the landscape condition. At the local level,

pre-activity assessments that consider data from the Ohio Biodiversity Database for the presence of RTE species or their habitats are completed. By policy, state forest managers are required to have on-the-ground consultations with biologists or botanists to confirm the findings of the database search. Concentrations of rare species or habitats are placed into more protected conservation zones. Outside experts recommend mitigation practices to Ohio DOF on the activities that are proposed.

2.1.3 Socioeconomic Context

The following text was modified from the 2011 certification report:

Ohio's forests provide the public with many economic benefits, social benefits and services. In 2007, Ohio ranked sixth nationally in GDP from manufacturing of furniture and related products. A recent study found that Ohio's forest products industry contributes \$15.1 billion to Ohio's economy and employs over 119,000 people. Other economic benefits of forests include nature-based tourism and non-timber forest products (e.g., ginseng, maple syrup, Christmas trees). However, the benefits that forests provide goes beyond forest products and tourism and include numerous ecosystem services that may not have a dollar amount assigned to them. Some examples of ecosystem services include improved air and water quality, carbon sequestration, biodiversity, energy reduction in urban areas, and scenic landscapes for recreation. Of the 12% of Ohio's forest land that is publicly owned, management often focuses on sustaining some or all of these benefits and services. While many private forest land owners enjoy many of these benefits and also manage for them, a recent woodland owner survey found that the vast majority are not seeking management advice from natural resource professionals (only 13% of family forest owners have sought advice). Investments of time, money, and expertise on all forest lands are necessary to sustain the important and diverse benefits and services that Ohio's forests provide to individual forest landowners and the general public.

Wood Products

Ohio is regularly one of the top 15 states for wood products and furniture manufacturing. The Gross Domestic Product (GDP) for wood-related industries in Ohio has been relatively stable over the past decade, with furniture prices showing a gradual increase. Timber prices in Ohio, however, have declined significantly since 2005. The total volume of roundwood harvests in Ohio was similar between 1989 and 2006, but the proportion of sawlog harvests increased during that time while pulpwood harvests decreased. Oak continues to be the dominant species harvested, although its relative dominance has decreased. The harvest of other species, like maple and yellow poplar, has increased. Economics and policy are driving the development of energy production from woody biomass. Planning for biomass-fueled power plants is underway, but further analyses are needed to quantify potential sources of biomass and evaluate their sustainable use. Eighty-one percent of logs utilized by Ohio sawmills were harvested in Ohio, indicating that Ohio's wood products industry meets the majority of its demand using local (in-state) sources.

Non-timber Forest Products

Some important non-timber forest products in Ohio are maple syrup, ginseng, and Christmas trees. In recent years, Ohio ranked 6th among states for annual production of maple syrup and ginseng, and 9th for Christmas trees. Of Ohio's various non-timber forest products, maple syrup has the greatest economic value (almost \$3.8 million in 2008).

Outdoor Recreation

Public forest lands in Ohio are used for a variety of recreational activities, including hiking, camping, wildlife watching/photography, and trail riding (horses, mountain-bikes, ATVs). Nationally, Ohio continues to rank poorly for per capita outdoor recreation acreage. While the Ohio State Parks system is the principal land area devoted to meeting the Ohio citizenry's outdoor recreation use demands, the State Forests administered by the ODOF also provide important outdoor recreation use opportunities including camping, fishing, boating, hunting, shooting and hiking.

Investments

Significant investments are being made in forest health, management, and research in Ohio. One important program that supports management on Ohio's private forest lands is the USDA Environmental Quality Incentive Program (EQIP), which invested \$1.8 million in 2009. The Ohio DOF has also invested over \$1 million in the last few years to procure and implement a forest information system, new imagery for state forests, and a comprehensive inventory of 80% of state forest acreage.

Indigenous People's Issues

Ohio has no state or federally recognized tribes. There are no tribes that have current legal rights or other binding agreements on state forest land. Nonetheless, Native Americans still reside in Ohio. Tribes and other less formally structured Native American groups residing elsewhere trace their histories back to Ohio and, as such, have varying levels of interest in land management activities on public lands in Ohio.

In Ohio, the vast majority of indigenous sites are ceremonial earthen mounds which were constructed in pre-historic times and still exist throughout the landscape. These sites, which were important to pre-historic cultures, were often used and adopted by more recent indigenous cultures. Locations of known mound sites are held and managed by the Ohio Historical Preservation Office (OHPO) and are cataloged in a spatial database. Ohio DOF as a regular practice consults the OHPO database during pre-activity assessments. Ohio is home to two protected concentrations of mounds; the Hopewell National Historic Park (NPS), and the Newark Earthworks Center (Ohio State University). Staff foresters have visited these sites and have received training on the importance and recognition of mounds and appropriate forest management practices near these sites. Current efforts in Ohio revolve around the formation of an advisory committee, consisting of archeologists, and tribal representatives, who would offer

consultation and development of best management practices for forest management in order to further protect these sites.

2.1.4 Land use, Ownership, and Land Tenure

Ohio DNR-DOF manages over 203,000 acres of forestland divided into 21 separate state forests. Most of the state forest acreage (80%) is located in the southern un-glaciated hill country of Ohio. The largest state forest is over 64,000 acres and the smallest is around 300 acres. Currently, state forests are multiple-use forests with DOF having statutory authority to manage the forest sustainably. All state forests are open to the public for hunting, hiking, and other passive forms of recreation. Historically, many state forests were marginal farm or grazing land and received heavy-handed land use from timber extraction for iron-ore furnaces and mineral extraction. Many state forests were protected during the early part of the 20th century through efforts from agencies such as the Civilian Conservation Corps. State forests are now primarily managed for the sustainability of native forest ecosystems. There are some limited uses of state forests for oil and gas production and two state forests have leases for underground storage of natural gas. State forests are an important part of local rural economies due to recreation and tourism opportunities and the distribution of timber revenue to local counties, townships, and school district governments.

Eighty-eight percent of Ohio’s forest land is privately owned with the largest ownership category being family forests, which represent 73% of the state’s forests. The State of Ohio owns 5% or 423,000 acres of forest land in Ohio, with the Ohio Department of Natural Resources owning the largest block of that area. A total of 806,600 acres of forests is protected by ownership from land-use conversion, including local, state, and federally-owned government lands, as well as lands owned by non-governmental organizations like The Nature Conservancy.

2.2 Forest Management Plan

Management Objectives:
Ohio DOF has five-year management plan and associated supporting documents that relate back to the overall Biodiversity and Desired Future Condition which are to: <ul style="list-style-type: none"> • Maintain and promote the regeneration of oak-hickory forests • Protect rare or threatened species and communities • Maintain and promote habitat for a diversity of forest-associated wildlife
Forest Composition and Rationale for Species Selection:
Ohio is fortunate to have a moderate amount of forestland. Of the State's 26.2 million acres, 7.86 million acres, or 30% of the total land area, is forested. Of this area, 7.57 million acres are considered productive forestland according to US Forest Service surveys. Within a state where agriculture represents an overwhelming percentage of the land use, this figure is significant. Of even more significance however, is the distribution of public and private forestland ownership. Approximately 93% of all forestland in Ohio is owned privately while the remaining 7% is owned by various public organizations. The Division of Forestry manages 203,000 acres or 2.4% of Ohio’s forestland. Private

forestlands are usually characterized by small, unmanaged or little managed parcels used for any single or variety of reasons with no coordination among parcels. Public forests on the other hand are generally extensive areas of forest cover with management objectives delineated and continuous throughout the ownership.

Ohio's state forests exist mostly in southern un-glaciated portion of the state and exist on relatively xeric sites and are dominated mostly by oak/hickory forest types. Inventory data show that the majority of stands are dominated by oak/hickory forest types (75%); are in the saw timber size class (75%); and have relatively high stand densities (82%). Eighty-eight percent of state forest stands are between 40 and 80 years old. While oak species are prevalent in the overstory, they make up a very small percentage of the composition of the mid-story and understory suggesting that they will be replaced during succession. USFS FIA statewide data and other sources show that oak species are in decline in Ohio and are being replaced by more mesic shade tolerant species. Ohio DOF has an oak management strategy to promote the new oak regeneration in order to conserve oak forests.

General Description of Land Management System(s):

Silvicultural systems on state forests are outlined in the management guidelines for each of the conservation zones. Primarily, Ohio DOF has an oak management focus and relies on even-aged techniques such as shelterwood systems coupled with prescribed burning or other release techniques to promote new oak regeneration. Intermediate treatments (thinning and improvement harvests) are standard practice. Other silviculture systems such as single-tree selection and group selection are employed on more mesic sites. Forest compartments are reviewed on a 20-year cycle at which time foresters determine the prescriptions for each stand within a compartment. Foresters rely on USFS SILVAH Oak program to help determine appropriate prescriptions. All silvicultural systems are employed in natural forests and rely on natural regeneration techniques.

Ohio DOF, as a public land manager, has a robust recreation program with law enforcement obligations. Ohio DOF actively manages forest-based recreational opportunities and facilities such as hiking and bridle trails, primitive camp sites, and shooting ranges. There are over 350 miles of recreation trails on state forests.

Harvest Methods and Equipment used:

Conventional ground-based logging. Hand felling and rubber tired skidders. Cut-to-Length mechanized logging.

Explanation of the management structures:

The Chief of the Division of Forestry has broad authority to manage state forestlands for multiple purposes. The Ohio Revised Code, Sections 1503.03, 1503.04 and 1503.05 empowers the Chief to "...acquire land suitable for forestry purposes . . . expend funds for the management, development and utilization of such lands . . . plant such trees as he deems expedient and take such measures as are necessary to bring about a profitable growth of timber. . ." The Chief ". . . has entire custody of such forest lands and . . . may sell timber and other forest products from the state forests whenever he considers such sale desirable. . . may grant easements and leases on portions of state forest lands . . . and may grant mineral rights on a royalty basis."

In addition to this authority, the Chief receives advice from the Forestry Advisory Council (FAC). The FAC is a legally authorized body composed of eight members representing forest-based research activities,

small private forestland owners, large private forest landowners, the pulp and paper industry, other forest industries, soil science, forest recreation and the public. “The Council may advise and make recommendations to the chief of the Division of Forestry concerning forestry practices and programs in the State, and may assist the division in promoting cooperation on forestry practices and programs with other agencies, political subdivisions, and private interest.” (ORC 1503.40)

State forests are grouped into eight administrative units; with each unit having a manager and associated support staff. There are approximately 70 employees on state forests; approximately 20 professional foresters or administrators and 50 support staff. There are eleven Division of Forestry field offices located throughout the State. The ODNR-DOF is headquartered at 2045 Morse Road, Building H-1, Columbus, OH 43229-6693.

2.3 Monitoring System

<p>Growth and Yield of all forest products harvested:</p> <p>DOF has an integrated forest information system through which harvest levels and inventory data are tracked. DOF compiles inventory data each year from post-harvest cruising and prescription cruising and updates the database. These data are “grown forward” using the USFS Forest Vegetation Simulator (Northeast Variant) by stand and extrapolated to like stand types of similar composition, size class, and density. Mean Annual Increments for a ten-year period are included in each state forest plan and used for harvest scheduling purposes. Results of growth and yield analysis are checked against current FIA county averages for consistency. Current efforts revolve around capturing data on small outlying forests for which good data do not exist.</p>
<p>Forest dynamics and changes in composition of flora and fauna:</p> <p>Ohio DOF maintains an inventory database as part of their integrated forest information system. Forests are compartmentalized and these compartments are reviewed on a 20-year cycle. The compartment review consists of inventory activities for each stand within the compartment as well as any other features or special sites that may need monitored. The compartment review process serves not only as a mechanism for prescribing silvicultural activities but also as a mechanism to monitor changes in species composition, volumes, stocking, regeneration, stand composition and structure, and timber quality. The results of the compartment review are summarized in the compartment review report and loaded into the forest information system.</p>
<p>Environmental Impacts:</p> <p>All prescribed activities, as well as recreational facilities, that occur on state forests are inspected during the activity and post-activity. These inspections serve as not only a monitoring of contract compliance but also as a monitor of environmental impacts. Inspections are designed to monitor the effectiveness of Best Management Practices, SMZ’s, contract terms, roads, trails, landings, and site rehabilitation. Inspections are done usually at least once per week on active sites. Inspections are documented on forms that include criteria relating to wildlife, aesthetics, erosion, rutting, residual stand damage, etc. Upon completion of an activity, a final inspection of overall contract compliance and efficacy is completed and approved by management. Inspection reports are summarized for overall trends in contract compliance and BMP effectiveness.</p> <p>DOF has a Forest Health program that conducts annual monitoring of forest pests and other health issues and disseminates results throughout the agency. Local unanticipated loss or vulnerability is documented, reviewed, and treated as needed.</p>

DOF has several other program areas through which monitoring takes place such as the prescribed fire program and recreation programs. These monitoring efforts are incorporated into management decisions.

DOF regularly obtains data from the Ohio Biodiversity Database, the Ohio Historical Database, and from biologists and botanists on RTE species and protection mechanisms.

Social Impacts:

The evaluation of social and economic impacts is undertaken by periodically gathering and considering information from several sources. One significant source of social and economic evaluative information is the Ohio Statewide Forest Action Plan (FAP). The Food, Conservation, and Energy Act of 2008 (the 2008 Federal Farm Bill) requires each state to complete a Statewide Forest Action Plan to continue to receive funds under the Cooperative Forestry Assistance Act). The results of the FAP and the associated strategies to deal with the identified threats is one of the sources that state forest managers incorporate into DOF’s understanding of social and economic impacts of state forest management.

Other efforts of social and economic evaluation are included in the suite of particular programs and efforts specific to state forest management. Many DOF staff participate in various civic activities in their local community. DOF distributes a portion of the proceeds of timber revenue to local counties, townships, and school districts. The DOF utilization and marketing program works cooperatively with several agencies and industry to enhance Ohio’s wood products markets and also publishes a bi-annual timber price report. The DOF law enforcement and recreation program through the administration of the various recreational facilities that exist on state forests, is developing a backcountry recreation management plan with user input. The recreation program tracks user data through voluntary user registrations located at each recreation facility. DOF engages citizen’s through open houses and public meetings during their planning process and solicits comments on each year’s planned activities.

Costs, Productivity, and Efficiency:

DOF’s budgeting process and fiscal staff review time and activity reports and monitor employee duties and program reports. DOF has an Integration Committee tasked with management review of all program monitoring reports. This committee analyzes each year’s progress and efficiency and makes management decisions for future directions.

3. Certification Evaluation Process

3.1 Evaluation Schedule and Team

3.1.1 Evaluation Itinerary and Activities

Monday October 26, 2015	
FMU/Location/ sites visited	Activities/ notes
ODNR Central Office – Columbus 8 to 9:30 am	Opening Meeting: Introductions, program overview, client update, review audit scope, audit plan, intro/update to FSC and SCS standards and protocols, review of open CARs/OBS, final site selection

<p>9:30 am to 4 pm</p>	<p>Meet with State Forester</p> <p>Management planning, document and evidence review, including (but not limited to) the following:</p> <ul style="list-style-type: none"> • Inventory Process and Updates • Determination of Allowable Harvest and Growth • State Forest Plan – overall • Individual State Forest 5-Year Plans • Annual Work Plans • Ohio Wildlife Action Plan and other landscape-level plans • Heritage Mapping: Ohio Biodiversity database • Historic/Cultural Sites • HCVF and RSA Processes • Forest Insect and Disease Program • Invasive Control Program • Fire Program • Management Review • Tax payments • Deed and lease information • Public complaints record • Illegal activities record • Old Growth (OG) • Monitoring records for HCVs • 3.3a (evidence of invitation to tribal representatives) • Training records • Recent salvage activity/acreage • COC (we can probably do this in the field from a real or template contract) • Label/logo and claims on sales documents • Other Issues
<p>Tuesday October 27, 2015</p>	
<p>FMU/Location/ sites visited*</p>	<p>Activities/ notes</p>
<p>Northern Forests</p>	<p>- Michelle Matteo</p>
<p>Mohican SF 8 am to 12 pm</p>	<p>Daily opening briefing</p> <ul style="list-style-type: none"> • Introductions • Agenda Review • Audit Protocols • Overview of Forest being visited <p>Selected Sites</p> <ul style="list-style-type: none"> • High Priority Sites from auditor selections • 1 or 2 harvest areas with equipment on-site • Special Sites: ecological, historic, recreation, HCVF, etc. • Infrastructure/ Roads

	<ul style="list-style-type: none"> • Other <p>Michelle Matteo <u>Ohio Division of Forestry</u> Chad Sanders, Ohio DNR Forestry Certification Coordinator, Mohican State Forest Manager Gregg Maxfield, District Forest Manager, North District Dan Balsler, Assistant Chief</p> <p>Primarily recreation & civic projects, due to its large number of recreational, service, and civic projects and limited amount of timber harvesting that occurs.</p> <p>Site 1: The Memorial Shrine & the Memorial Forest and Forest Park. Established 1947 as a memorial to OH men and women that lost their lives in WWII, now for all OH residents killed in war. 270-acre Memorial Forest Park (part of the larger Memorial Forest) is set aside as a reserve. On June 23, 1936, a joint congressional resolution designated the last Sunday in Sept as Gold Star Mother’s Day. Annual Gold Star Mother’s Day Memorial Service held each Sept and hosted by the Mohican. Large amount of in-kind service by forest staff for upgrades to facility, regular maintenance, & hosting the annual Memorial Service.</p> <p>Site 2: Ball field – historical ball field was recreated for Youth Camp (privately-run residential program for at risk teen boys – on SF leased land) in an area that was bridle path access & parking. Special use permit issued for use from April 1-Aug 31. Sept through March, the area can be used by the bridle trail users as overflow parking and access.</p> <p>Site 3: Horse Camp improvement. Extensive stakeholder consultation with Youth Camp & 3 horse groups – cooperatively decided to move the bridle parking across the street with more parking & creation of a day use & camping area. In the process, a small strip of timber was cut from the above Memorial Forest Park (less than 1 acre) to accommodate the parking/day use/camping area. Water, bathrooms, picnic shelter, firewood provided to users.</p> <p>Site 4: Discovery Forest. Interpretive educational forest. Kiosk with good forestry information. Silviculture treatments viewed with signage of the year of harvest. Thinning in pine stands with various years thinning projects viewed.</p> <p>Site 5: American Chestnut nursery/plantation. 2 acres planted in consultation with the American Chestnut Foundation (ACF), primarily pure saplings, established in 2007. Backcrossed 15/16 hybrids (144 stems) also planted in 2009. Annual seed collection occurs as part of the agreement with the ACF.</p> <p>Site 6: 8-ac pre-commercial thinning/crop tree release. To be completed by staff in winter.</p> <p>Site 7: Elm research study by USFS. Genetically resistant elm planted in order to naturally breed with planted native elms & check for resistance to Dutch Elm disease.</p>
12 to 3 pm	Travel from Mohican to Scioto State Forest
Scioto SF	Forest briefing

<p>3 to 5 pm</p>	<ul style="list-style-type: none"> • Introductions • Agenda Review • Audit Protocols • Overview of Forest being visited <p>Selected Sites</p> <ul style="list-style-type: none"> • High Priority Sites from auditor selections • 1 or 2 harvest areas with equipment on-site • Special Sites: ecological, historic, recreation, HCVF, etc. • Infrastructure/ Roads • Other <p>Daily closing briefing</p> <p>Michelle Matteo <u>Ohio Division of Forestry</u> Chad Sanders, Ohio DNR Forestry Certification Coordinator, Mohican State Forest Manager Gregg Maxfield, District Forest Manager, North District Dan Balsler, Assistant Chief Brian Kelly, Scioto Trail Forest Manager John Bauerbach, Forester Jared Craig, District Land Management Administrator, Chillicothe office OH Master Logger (present at Site 1)</p> <p>Site 1: Harvest 1509. 176-acre active thinning with six Cutting Section (CS). Logger’s work in one CS almost completed and another CS is just starting. Logger present and interviewed, extremely good relationship between logger and forester, per interview. Logger shut down activity today because of wet weather. Water bars put in at end of each day for next in advance of rain. Skid trails in good condition, despite some rain. Haul road layout & construction excellent. LWD, snags present, creation of a large wildlife tree by girdling. Avoiding any stream crossings by working down the top of the ‘fingers’ and staying out of the hollows. No damage to residual stand.</p> <p>Site 2: Harvest 1604. 10-acre mature pine CTL clearcut with hardwood retention. Sold, not yet cut. Buffered stream was marked, some invasives (multiflora rose) present near the streambank.</p> <p>Site 3: Merchandising TS C-7. 8-acre clearcut with hickory retention, additional retained patch of hickory near top of slope. LWD and snags present. Wildlife present on site (woodcock flushed when walking out of the stand).</p> <p>Site 4: BMP demonstration site. Training area for SF employees and OFA’s Master Logger program. OFA coordinates the 1/year or 2/yr training with help from industry – Soil & Water, Gladfelter, & DOF. Items viewed: culvert replacement, road block with large rocks to limit access, well-constructed haul road, dips in road, rather than water bars, poles in dip for corduroy, silt fence placement, brushing in an old skid road.</p>
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<p>Southern Forests -</p>	<p>Anne Marie Kittredge (AMK) & Mike Ferrucci (MF) travel/visit separate sites on the Shawnee</p>
<p>Shawnee SF 8 am to 12 pm</p>	<p>Anne Marie Kittredge Daily opening briefing</p> <ul style="list-style-type: none"> • Introductions • Agenda Review • Audit Protocols • Overview of Forest <p><u>Ohio Division of Forestry</u> Greg Guess, Deputy Chief, Chillicothe office David Parrott, Forester</p> <p>* Site 1: Forest Road 6. Excellent shape with gravel, graded and crowned. * Site 2: Harvest # 1514. 75-acre shelterwood & deferment harvest includes LWD, snags, and dens. Marked to retain lose bark trees for bat habitat. White oaks with grapevines retained for cerulean warblers. Temporarily shut down. Water bars on road on the completed section of the job. Excellent utilization. * Site 3: Hiking trail near harvest # 1514. Recently maintained/widened with bull dozer for water control features. Edges of trail still raw. Includes warning signs associated with logging trucks for nearby timber sale. * Site 4: Bridle trail near harvest # 1514. Excellent condition. Includes warning signs associated with logging trucks for nearby timber sale.</p>
<p>Stakeholder Meeting Friendship United Methodist Church, 582 Edward Warren Drive Friendship, Ohio 45630 12 to 2 pm</p>	<p>Anne Marie Kittredge</p> <ul style="list-style-type: none"> • Introductions • Brief review of the FSC standards, audit protocols, stakeholder confidentiality, informed consent • Review of comments, maps, documents received to date • Review of new comments if applicable • Wrap-up summary by auditor
<p>Shawnee SF 2 pm to end of day</p>	<p>Anne Marie Kittredge Brief tour of Shawnee SF to wrap up morning field visits. See notes above.</p>
<p>Shawnee SF 8 am to 4 pm</p>	<p>Mike Ferrucci Daily opening briefing</p> <ul style="list-style-type: none"> • Introductions • Agenda Review • Audit Protocols • Overview of Forest being visited <p>Selected Sites</p> <ul style="list-style-type: none"> • High Priority Sites from auditor selections • 1 or 2 harvest areas with equipment on-site • Special Sites: ecological, historic, recreation, etc. • Infrastructure/ Roads • Other

	<p>Daily closing briefing</p> <p><u>Ohio Division of Forestry</u> Nate Jester, District Forest Manager, South District Jared Craig, District Land Management Administrator, Chillicothe office Dale Egbert, Forest Manager, Shawnee State Forest</p> <p>Site 1: Contract 1512 Active Thinning. This 95-acre improvement harvest on a site with some steep ground was marked to remove low-value and mature trees. Three of the five cutting sections have been completed, including one where recommendations of a biologist from the Indiana Division of Wildlife to modify the treatment in a section with potential rattlesnake habitat were implemented. The sale design included no-cut buffers along Shawnee Forest Road 6 and along Big Run Creek. Existing and new skid roads were shaped with a bulldozer prior to harvest and have been smoothed, had water-bars installed, and covered with straw. They will also be seeded when appropriate. The BMPs used here were effective.</p> <p>Site 2: Lampblack Road, Shawnee State Forest Road #16. This forest road is well-built and maintained, with a crown, gravel road surface, ditches, and newly-replaced ditch relief culverts.</p> <p>Site 3: Lampblack Road, Forest Road #16, 30-inch culvert installation. The 30-inch culvert allows an intermittent stream to cross road. Culvert base is sufficiently deep to allow the rocky stream substrate/bed load to move into culvert, providing a somewhat natural stream bottom. Culvert was aligned with existing channel leaving a sharp turn 6-feet below the outlet.</p> <p>Site 4: Backpacker Trail. A short section of trail, part of a 70-mile system, was walked. The trail is smooth, properly-drained, and sufficiently wide to allow two walkers side-by-side. The reasons for, public reactions to, and process of modifying the trail system to allow mechanized maintenance using small bulldozers were discussed.</p> <p>Site 5: Contract 1325 Completed Deferment Harvest. All three cutting sections were reviewed by walking through portions of and most of the perimeter of this 160-acre completed harvest. The auditor was able to see most skid roads and trails, all of the major retention patches, and most of the reserved trees, as well as the regrowth after harvest. Sections where two growing seasons have passed are clearly regenerating fully, and sections where one growing season has passed appear to be developing complete cover as well. Skid road design, construction, and post-harvest stabilization are superb. The sale was marked by a contractor who followed the prescription as written. The prescription calls for harvest of dominant trees and for selecting co-dominant or intermediate crown class trees for retention. Several large scarlet oak stumps and nearby unused cut stems were hollow, which represents a missed opportunity to retain potential den trees, but in most cases the stumps were sound on the perimeter, and thus it may not have been apparent that they were hollow.</p> <p>Site 6: Shawnee State Forest Road #16. This forest road is well-built and</p>
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	<p>maintained, with a crown, gravel road surface, ditches, and ditch relief culverts.</p> <p>Site 7: Overlook, 2009 Wildfire. Regeneration is now 6 to 12 feet tall.</p> <p>Site 8: Shawnee State Forest Road #1. This forest road is paved and generally well maintained.</p> <p>Site 9: Pond Lick Lake Dam. A significant investment has recently been made to rebuild the dam and spillway, dredge the lake to remove accumulated silt, restore the check dams, and restore portions of the shoreline. With support from the Indiana Division of Wildlife structure (habitat) was added to the bottom of the lake and the lake was stocked with bluegill, bass, and channel catfish.</p> <p>Site 10: Contract 1403. Completed harvest with 2 cutting sections on 65 acres. The landing located along Shawnee State Forest Road #1 has a good cover of grass and the wood chunks and brush from logging have been piled in the back at least 150 feet from the road.</p>
<p>Wednesday October 28, 2015</p>	
<p>FMU/Location/ sites visited*</p>	<p>Activities/ notes</p>
<p>Vinton Furnace SF 8 am to 1 pm</p>	<p>Daily opening briefing</p> <ul style="list-style-type: none"> • Introductions • Agenda Review • Audit Protocols • Overview of Forest being visited <p>Selected Sites</p> <ul style="list-style-type: none"> • High Priority Sites from auditor selections • 1 or 2 harvest areas with equipment on-site • Special Sites: ecological, historic, recreation, HCVF, etc. • Infrastructure/ Roads • Other <p>Michelle Matteo, Mike Ferrucci, Anne Marie Kittredge <u>Ohio Division of Forestry</u> Chad Sanders, Ohio DNR Forestry Certification Coordinator, Mohican State Forest Manager Gregg Maxfield, District Forest Manager, North District Greg Guess, Deputy Chief, Chillicothe office Nate Jester, District Forest Manager, South District Jared Craig, District Land Management Administrator, Chillicothe office Courtney Cawood, Forest Manager Danzil Walker, Forester Christopher Kerr, Technician USDA Forest Service Research Scientist, Northern Forest Experiment Station, USDA Forest Service Site Manager, Vinton Furnace Research Station, USDA Forest Service</p> <p>Site 1: NIPF Demonstration Plot #1 Crop Tree Release. Non-commercial</p>

	<p>harvests in 1998 and 2008, with the next treatment tentatively scheduled for 2018. Each demonstration plot covers approximately 10 acres.</p> <p>Site 2: NIPF Demonstration Plot #2 Diameter Limit, 12-inch Stump. Harvested in 1998, with a crop-tree release tentatively scheduled for 2018.</p> <p>Site 3: Native American Mound. Site had been vandalized.</p> <p>Site 4: Vinton Furnace A-2 Completed Clearcut. Sold to Glatfelter as part of the Fiber Supply Agreement that runs with the land. All trees including saplings were cut. Waterbars are in place and site is stable. Will become a NIPF Demonstration Clear-cut Plot.</p> <p>Site 5: NIPF Demonstration Plot #4 High-Grade. Cut in 1998.</p> <p>Site 6: NIPF Demonstration Plot #5 Clearcut. All trees were cut in 1998. A dense stand of oak and mixed hardwoods is in place. A crop-tree release treatment was completed in 2010.</p> <p>Site 7: NIPF Demonstration Plot #6 Deferment Harvest. Cut in 1998. Adjacent to stand some Ailanthus present; discussion ensued with researcher about ongoing Ailanthus research.</p> <p>Site 8: Vernal Pool, Arch Rock Road. This man-made vernal pool was created one-year ago and has been populated by obligate vernal pool species.</p> <p>Site 9: Planned Burn Site</p>
<p>Richland Furnace SF 2 to 5 pm</p>	<p>Forest briefing</p> <ul style="list-style-type: none"> • Introductions • Agenda Review • Audit Protocols • Overview of Forest being visited <p>Selected Sites</p> <ul style="list-style-type: none"> • High Priority Sites from auditor selections • 1 or 2 harvest areas with equipment on-site • Special Sites: ecological, historic, recreation, HCVF, etc. • Infrastructure/ Roads • Other <p>Daily closing briefing</p> <p>Michelle Matteo, Mike Ferrucci, Anne Marie Kittredge <u>Ohio Division of Forestry</u> John Bauerbach, Forester</p> <p>The same people attended as attended Vinton Furnace except the Forest Manager.</p> <p>Site 1: Culvert for access to parking area and forest access road.</p> <p>Site 2: State Forest Access Road and All-Purpose Vehicle (APV) Road. The road is well-constructed and maintained, having a gravel surface, a crown, inside ditches with cross-drain culverts, and rolling dips.</p> <p>Site 3: The Ohio State University Shelterwood and Burn Study. This large study site has includes shelterwood treatments with various residual stocking levels, and tests of burned vs. not-burned areas.</p>

	<p>Site 4: Contract 1412. Completed harvest on 69 acres with 3 cutting units, all reviewed by the audit team. Two units received deferment harvests and one received a shelterwood (establishment) harvest. The harvest was done by Lee Saylor Logging Company, an Ohio Master Logger Company. Portions of an APV trail are on the harvest area and were closed during logging operations. Some timber from an adjacent private timber sale was yarded onto state land with permission, with logging debris from that operation moved back onto private land. BMPs are in place and appear to be functioning well, with one exception noted below for Site 5.</p> <p>Site 5: APV Trail between Points 2 and 3. The trail had been deeply incised into the hillside, so large Waterbars were constructed to drain the trail. Three of the Waterbars directed water to the side of the road where there is a man-made pond, and some sediment from one of the Waterbars has traveled through the filter strip and entered the pond. The site is shaped such that one or more Waterbars could have been constructed to direct water to the side of the road away from the pond.</p> <p>Site 6: RF B-6 Planned Harvest. A light thinning is marked. A buffer is in place between the sale area and an intermittent stream.</p> <p>Site 7: RF A-6 Merchandizing Harvest. Auditors inspected portions of Cut Section 3, a completed harvest on 11.5 acres. The cruise prescription was for a thinning, but foresters observed over-mature and dying trees, in part due to a wildfire on part of the area. Stand was marked and cut as a single-tree selection with group openings harvest. Groups have desirable regeneration of varied desirable species. The residual stand between the groups has healthy, vigorous, well-formed trees, many of which have had partial crown release.</p>
Thursday October 29, 2015	
ODNR Chillicothe Office – 8:30 to 10:30 am	Auditors & ODNR Staff Additional information provided to auditors, as needed
10:30 to 2 pm	Audit team only Follow-up and review outstanding issues Audit team deliberations
2 to 3:30 pm	Auditors & ODNR Staff Closing Meeting and Review of Findings: Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps

3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	4
B. Number of auditors participating in on-site evaluation:	3
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	4
D. Total number of person days used in evaluation:	16

3.1.3 Evaluation Team

Auditor Name:	Michelle Matteo	Auditor role:	FSC Lead Auditor
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Qualifications:	Michelle Matteo is a Forest Management Lead Auditor with experience conducting audits for large and small private and public landowners. Michelle also conducts Lead Auditor Chain of Custody audits under the SFI, FSC, and PEFC Standards with experience conducting hundreds of COC audits for a broad range of manufacturers and distributors. She is also a Qualified Lead Auditor for SFI 2010-2014 and SFI 2015-2019 Standard audits for procurement, land management, or both. Michelle is a forester, biologist, and arborist and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Certification, and is a current member of the Society of American Foresters. She has a background in urban and traditional forestry, wildlife biology, and watershed science, and has experience with both state and federal environmental regulations. Michelle earned her MS in Forestry and BS in Wildlife & Fisheries Biology from the University of Massachusetts in Amherst.		
Auditor Name:	Mike Ferrucci	Auditor role:	SFI Lead Auditor
Qualifications:	Mike Ferrucci is the SFI Program Manager for NSF – International Strategic Registrations and is responsible for all aspects of the firm’s SFI Certification programs. He is qualified as a RAB-QSA Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor for Forest Management, Procurement, and Chain of Custody, as an FSC Lead Auditor Forest Management and Chain of Custody, as a Tree Farm Group Certification Lead Auditor, and as a GHG Lead Auditor. Mike has led Sustainable Forest Initiative (SFI) certification and precertification reviews throughout the United States. He has also led or participated in joint SFI and Forest Stewardship Council (FSC) certification projects in nearly one dozen states and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He also co-led the pioneering pilot dual evaluation of the Lakeview Stewardship Unit on the Fremont-Winema National Forest. Mike Ferrucci has 33 years of forest management experience. His expertise is in sustainable forest management planning; in certification of forests as sustainably managed; in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis on regeneration and management of native hardwood species. Mike has conducted or participated in assessments of forest management operations throughout the United States, with field experience in 4 countries and 33 states. Mike has been a member of the Society of American Foresters for over thirty-five years. He is Past Chair of the SFI Auditor’s Forum. Mike is also a Lecturer at the Yale School of Forestry and Environmental Studies, where he has taught graduate courses and workshops in forest management, harvesting operations, professional forest ethics, private forestry, and financial analysis.		
Auditor Name:	Anne Marie Kittredge	Auditor role:	FSC & SFI Team Auditor
Qualifications:	Anne Marie Kittredge is a Forest Management Lead Auditor with experience conducting audits for large and small private and public landowners. Anne Marie also conducts Lead Auditor Chain of Custody audits under the SFI, FSC and PEFC Standards with experience conducting hundreds of COC audits for a broad range of manufacturers and distributors. Anne Marie is an SAF Certified Forester with more		

	<p>than 20 years of experience in traditional forest management, wildlife habitat management, marketing and utilization and forest cutting practices regulations. Anne Marie's experience as a state forester in Massachusetts focused on management of FSC certified state-owned forest lands, forest cutting practice regulation enforcement as well as private landowner assistance and current use certification administration. Anne Marie earned her MS and BS in Forestry from the University of Massachusetts in Amherst.</p>
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3.2 Evaluation of Management System

3.2.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME's conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3.2.2 Pre-evaluation

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

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

3.3 Stakeholder Consultation Process

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

- To solicit input from affected parties as to the strengths and weaknesses of the FME's management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

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

3.3.1 Stakeholder Groups Consulted During Evaluation for Certification

FME Management and staff	Recreational user groups
Contractors	Pertinent Tribal members and/or representatives
Lease holders	Local and regionally-based environmental organizations and conservationists
Adjacent property owners	Local, state, and federal regulatory agency personnel
Local and regionally-based social interest and civic organizations	Other relevant groups
Purchasers of logs harvested on FME forestlands	

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

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

Stakeholder Comments	SCS Response
Economic Concerns	
DNR has reduced its number of forest maintenance workers.	This has been noted during past audits. FSC does not require a minimum number of maintenance workers; the audit team confirmed through interviews and observations that the FME has sufficient human resources to maintain conformance to certification requirements. A recent grant will temporarily increase staff support for non-native invasive plant inventory/control.
DNR’s business practices are illegal/unethical including, for example, FAX timber sale bids that were accepted that should not be considered.	State Forest plans include a section on law compliance and DNR exhibits strong commitment to conforming to laws, rules, and regulations. DOF code & forest rules are reviewed annually and are part of new forester training, as confirmed by a review of employee training records Audit team inquiries and a web-based review did not reveal enforcement

Documentation was provided.	<p>actions in recent years against DNR related to compliance with applicable federal, state, or local forestry and related environmental laws and regulations. Documentation relating to the 2013 Tipton dispute and appeal was reviewed.</p> <p>The bidding documents submitted by stakeholders to the audit team were completed during 2013 and before this process was corrected. As confirmed through interviews with DOF staff and review of additional training and procedures documents, the audit team confirmed that DOF re-trained foresters and revised the bid proposal procedure documents to correct this situation in June 2015. An additional bid prospectus from January 15, 2015 was reviewed and no issues were found. As DOF has implemented corrective actions and avoidance measures, no non-conformity is warranted. The stakeholder may seek further action through DNR's stakeholder involvement mechanisms (http://forestry.ohiodnr.gov/pathwaystoparticipation) or using legal options.</p>
How does DOF insure that the timber bidding process is being done honestly?	
Is the timber sold under the 'merchandising' program included in the board foot volume harvested by DOF? If not this process cheats the local communities out of their share of the revenue generated from these sales.	Timber sold under the merchandising program is included in the BF volume harvested by DOF, as confirmed with a review of merchandising sales receipts, stumpage contracts, and timber sale monitoring summary.
Logging companies are allowed to extend timber harvest contracts for years and citizens of Ohio don't get the increased value of the timber.	Logging companies are allowed by contract to request a contract extension, with a formal review process through DOF. However, as confirmed through interviews and document review, contractors who do not abide by contract dates are assessed penalties and may be prohibited from bidding on future sales. Extension of contracts by request is a common provision in harvest contracts throughout the Lake States due to several factors, including, but not limited to, weather or soil conditions. This flexibility usually ensures that harvest can be timed to minimize damage to soil and water resources necessary to grow the next cohort of trees.
Is the Division of Forestry using the correct acreage to calculate growth?	Growth and yield calculations were reviewed by the audit team and found to be in conformance with the indicators of this Standard including for example the use of required 'planning unit' size.
Social Concerns	
DNR's lack of law enforcement is a concern.	<p>In the recent past, the FME's law enforcement responsibilities were taken over by another agency. The audit team looked for and did not observe law enforcement issues. For example, the audit team reviewed miles of</p>
Why are alcohol, drug use	

and ATV use not being stopped in Shawnee SF? Why are there no signs telling the public that these activities are not allowed?	roads, at least 4 of harvest areas, 2 scenic vistas, hiking and bridle trails and landings in order to investigate these concerns. While these kinds of illegal activities are commonly documented on public lands throughout the US, the audit team did not observe evidence (e.g., records of illegal dumping, trash, tracks) to support a non-conformance in association with this concern.
Would DOF consider hiring a sheriff deputy to patrol the Shawnee SF?	DOF follows up on reported incidents with responsible law enforcement personnel, as noted in their Chapter 12 of the LMM and confirmed in interviews with enforcement officials.
Will opening road # 5 for logging violate the back country rules?	The opening of road # 5 is no longer part of future plans for the Shawnee SF public travel as described in the Southern District Annual Work Plan 2016 (page 9). Logging is not prohibited in the back country.
Logging has negative aesthetics on forest.	The audit team reviewed miles of roads, a diverse sample of harvest areas, at least 2 scenic vistas, hiking and bridle trails and landings in order to investigate these concerns.
Weeds, briars, sumac and other scrubby trees will quickly take over and even inhibit hunting due to the dense brush and briars.	FSC does not require buffers on trails or roads and there are no laws or regulations that require them. Roads and trails observed by auditors during the audit were maintained; DOF has aesthetic guidelines. DOF was found to be in conformance with its aesthetic guidelines that cover all management activities. DOF reserves the right to manage vegetation, including timber, alongside trails and roads to control non-native invasive species, reduce safety hazards such as dead or dying trees, enhance unique or rare plant communities, repair drainage structures, and ensure that successional stages are represented throughout these pathways for aesthetics and resiliency due to disturbance events (e.g., pest outbreaks, fire, storms).
What is the yearly or five year plan to improve recreational activities in Shawnee SF?	Little Rocky Hollow is a State Nature Preserve (SNP), is managed by DNAP, and access is by permit only; this trail is not open to the general public. DNAP has not expressed any concern to the DOF on the condition of the trail.
It seems reasonable that all highways and roads passing through state forest land should have adequate buffers. These roads are “aesthetic corridors”, are major travel ways for tourists, and their aesthetic beauty should have the highest priority.	
The only public trail leading into Little Rocky Hollow State Nature Preserve was clear cut by the ODF. This was inexcusable and a heart breaker. The trail now is basically unsuitable for public entry.	This FME provides a wide variety of non-timber forest products and services. However, stakeholders’ comments mention that the FME’s emphasis on timber harvesting is perceived to be in contrast to the value of the other non-timber products and local economic uses of the forest (including, for example, ecotourism, hiking, wildlife protection, fishing and hunting) at Shawnee SF. There is an opportunity to improve staff understanding and consideration of recreational interests and use of the Shawnee SF.
Inadequate management of the forest’s lakes ...	For public lands, diversification of the economic use of the FMU is a requirement and includes, but is not limited to, recreation, ecotourism,

<p>deprives the public of enjoying many species of fish, promotes poor fishing conditions and does not enhance boating and canoeing.</p>	<p>hunting, and fishing. FME should demonstrate knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of non-timber forest products and services and strive to diversify the economic use of the forest.</p> <p>See 2015.2</p>
<p>DNR does not take care of vistas.</p>	
<p>DNR does not maintain hiking and bridle trails.</p>	
<p>DNR used a bull dozer to maintain our foot paths and bridle trails which is not necessary and does not consider aesthetics.</p>	
<p>‘Logging and burning on state forests ...destroys the aesthetic values, degrading the view-scapes from roads for auto touring, trails for hiking and bridle trails, degrades the back yards of local residents... are social justice issues as the forests are in rural areas with populations that tend to have lower economic means and more dependence on the forest...’</p>	
<p>It is dismaying to see the ODF perform logging operations adjacent to public recreational trails in a number of state forest areas. There should be buffers protecting the integrity of these deep forest trails.</p>	
<p>Hocking County, Ohio is a tourism mecca. The forested beauty of the county attracts people to rental cabins, restaurants,</p>	

<p>artist shops and stores where money is spent throughout the year. Business income plus local tax income totals 120 million dollars per year and the number of employees in the tourism business is in excess of 1000; one out of every seven working adults in the county. Standing large trees are far more valuable to the tourism industry than to the timber industry.</p>	
<p>DNR does not understand who visits the forest and why.</p>	
<p>All of my requests for information take an average of 6 weeks to receive a response.</p>	<p>DOF's methods of consultation are outlined in "Pathways to Participation" and are designed by DOF to be in conformance to indicator 4.4. FSC does not mandate the method of consultation therefore DOF has chosen several methods to engage stakeholders.</p>
<p>To date, DOF has not directly responded to the specific questions and concerns.</p>	<p>See 2015.1 See 2015.2</p>
<p>I present my case to you in relation to the needed protection status of Rock Run's Upper Watershed, because my voice for the most part has been ignored by the DOF.</p>	
<p>DNR staff are not available in local and regional office to answer phone and answer questions or give direction to tourists.</p>	
<p>DNR lacks of knowledge and concern about forest's infrastructure.</p>	
<p>The open house is the only public comment event that</p>	

<p>the DOF offers in southern OH; Shawnee SF, Ohio's largest SF is lumped in with 13 other much smaller forests.</p>	
<p>The open house held in the backyard of their Chillicothe office during the last week of July includes no accommodations: no seats, no water, no agenda and no meeting minutes. The meeting only lasts 2 hours on a week day and working people cannot always attend.</p>	
<p>Environmental Concerns</p>	
<p>I oppose all commercial logging in my state forests.</p>	<p>Per state law, Ohio DNR-DOF has the right to own and manage the forest and its resources, including timber, within any constraints established by law or regulation. In addition to including specific guidelines for growth and yield and harvest volumes to ensure that production forests can provide a continuous supply of timber, FSC requires that timber harvest units include measures to protect or enhance legacy trees, wildlife habitat and sensitive features. FSC also requires that the FME conduct several analyses that may result in the establishment of reserves or areas with limited to no timber harvest.</p>
<p>Let State Forests do what they can do best and in many cases do what only they can do – be large, native, natural eastern temperate forest bio-reserves.</p>	<p>The 5-year management plan (pages 18, 21) states that ...'Certain areas on state forests are identified and zoned as High Conservation Value Forests. This zone is intended to protect and maintain specific areas that are environmentally, historically, or culturally special. High Conservation Value Forests possess attributes such as significant concentrations of rare, threatened, or endangered species; areas that are fundamental to meeting basic services of natural or human communities; and areas that have critical cultural or religious significance. Examples of these areas include for example Native American earthworks, historic cemeteries, the Shawnee Wilderness Area, the Maumee Muck Farm prairie, and several other areas containing rare features'...</p>
<p>Keep Shawnee wild: preserve native, natural forested habitat.</p>	
<p>Shawnee Forest needs to be left alone.</p>	<p>In fact, of the 63,118 acres of forestland within the Shawnee SF 17.2% (10,867 acres) is reserved from active harvesting under one or more of these zones.</p>

	<p>For public lands, diversification of the economic use of the FMU is a requirement and includes, but is not limited to, recreation, ecotourism, hunting, and fishing. FME should demonstrate knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of non-timber forest products and services and strive to diversify the economic use of the forest. Additionally, in large part, DOF’s oak management focus has implications for a host of wildlife species that would predictably suffer if the forests were allowed to transition to mesic species over much of the landscape. DOW, USFS research, and other partners and publications support DOF in this effort.</p> <p>See 2015.2</p>
<p>Subsequent erosion of the clear-cut hillsides removes valuable topsoil and pollutes the streams.</p>	<p>The audit team specifically reviewed harvest sites, best management practices (BMPs) and erosion control. The audit team observed conformance to the FSC Standard and indicators that protect soil and water resources, particularly on roads since those usually are the principle source of erosion in harvest units. FME maintains drainage structures on roads and installs BMPs such as water bars on secondary roads to control erosion. The audit team also observed dispersal of harvest residues throughout units, which ensures nutrient cycling and covers some of the soil.</p>
<p>As stated in the Draft Management Plan, timber harvesting will increase to 40% of annual growth over a rolling 5-year period and may even go above 40% in particular state forests if the overall average for all state forests is 40%.</p>	<p>Timber harvest activity was reviewed by the audit team and found to be in conformance with the indicators of this Standard. Within many State Forests, including for example Shawnee SF, harvest levels remain below 20% of growth.</p> <p>See 2015.2</p>
<p>DNR has increased logging activity.</p>	
<p>DNR lacks of knowledge and protection of rare plants.</p>	<p>See 2015.2, 2015.3, 2015.4 and 2015.5</p>
<p>Logging projects are being arranged without adequate environmental impact studies.</p>	<p>As confirmed through interviews and document review, this FME uses many different datasets during the process of identifying sites that may include sensitive areas, which requires coordination and review of information from a variety of sources.</p> <p>DOF participates and complies with DOW Wildlife Action Plans (recovery goals) for forest dwelling RTE species. They are referenced in the 5-year management plans. DOF is an active contributor to the Indiana Bat Management Strategy and the Karner Blue Butterfly Recovery Team. DOF</p>

	<p>adopted the biodiversity goals outlined in the Forest Action Plan and placed them in each forests management plans. DOW and DOF have been cooperating on implementing forest management that it intended to create openings for oak regeneration and structure for several wildlife species that may have been more prevalent during pre-European settlement conditions.</p> <p>DOF’s fire staff consult with DOW staff to protect potential den sites for Timber Rattlesnakes during prescribed burns, as confirmed through interviews with DOF and DOW. The early successional habitat creates foraging habitat for small mammals, which are a food source for snakes. Burns also may promote snags and woody debris, which snakes use for shelter and hiding. DOF has never burned a den to best of its knowledge since burns occur in the late fall or early spring prior to snakes coming out of hibernation.</p> <p>OH DNR DOW reviews potential harvest plans and develops mitigation measures for RTE species and their habitats. And yet DOW needs to receive draft harvest plans from DOF in a timely manner, well before the annual stakeholder open house is scheduled in order to adequately review harvest plans and suggest mitigation measures. While DOW staff are knowledgeable of commonly prescribed mitigation measures, stakeholders had questions on specific sites that staff were unable to address satisfactorily in some cases. To ensure that staff are fully knowledgeable of specific site concerns, DOW may require more time to review planned management activities for RTE species attributes according to interviews - anywhere from 3-6 months in advance of the annual open house.</p> <p>In order to expedite the process of assessing and documenting the potential short and long-term impacts of planned management activities on RTE species prior to commencing site-disturbing activities while offering similar or better levels of its current performance, this FME should consider working with other agency staff to identify opportunities to make the RTE review process more efficient and this FME should consider sending draft harvest plans to DOW for review well in advance of the annual stakeholder open house. See 2015.3</p> <p>As confirmed through interviews with outside experts and document review, and Ohio Div. of Wildlife staff, gaps exist in the knowledge of Timber Rattlesnake (RTE) presence/absence, movements and habitat requirements in Ohio. To protect RTE species (Timber Rattlesnake), this FME could consider using a precautionary approach during all forest management activities within southern Ohio including, but not limited to, road maintenance, prescribed fire and timber harvesting. In the absence</p>
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	<p>of other information, there is an opportunity to consider, for example, regional expert information during the planning process, enhanced logger training with respect to rattlesnake protection during timber harvests and other methods used elsewhere in this region and suggested by experts during consultation. See 2015.4</p>
<p>Forestry has fragmented the Shawnee SF with logging roads, logging activities and burning that all birds, especially the neo-tropical migrants are subject to cowbird parasitism. Destroyed habitat is contributing to population decreases of birds and other organisms.</p>	<p>Other local experts submitted the following response. ...'In May and June 2014, The Ohio Bird Conservation Initiative and its partners held three workshops to train foresters, land managers, and woodland owners on the management recommendations found in the "Managing Forest Birds" guide. Sixteen employees of the Division of Forestry attended the workshops and learned how to best manage forest habitat to benefit bird populations. ... In my interactions with Division of Forestry personnel, they have demonstrated a sincere concern for the quality of Ohio's forest as wildlife habitat. I believe the decisions made regarding the management of Ohio's state forest reflect this.'</p> <p>Additionally, in large part, DOF's oak management focus has implications for a host of wildlife species that would predictably suffer if the forests were allowed to transition to mesic species over much of the landscape. DOW, USFS research, and other partners and publications support DOF in this effort.</p>
<p>A timber harvest is planned along Road # 5: how will you protect rattlesnakes?</p>	<p>The audit team reviewed documents and confirmed that environmental review was indeed delayed for a period of time; however, as a result, the timber sale review process was also delayed until review was completed. Projects that overlap with known Timber Rattlesnake habitat as it appears in the databased are reviewed and mitigation measures are implemented.</p>
<p>Efforts have been taken by DOF to 1) stop reviews of impacts to timber rattlesnakes for timber sales; 2) change the outcome of reviews for one or two timber sales in THSF; 3) stop field research on timber rattlesnakes in THSF; and 4) inappropriately control research on state forest land through proposed regulations. These actions have raised questions about the legitimacy of the review process and potential conflict of interest issues within ODNR.</p>	<p>Documents associated with timber sale review by DOW were reviewed by the audit team. As confirmed through document review and interviews, DOW review of documented habitat was in fact put on hold for a number of months and this delayed review resulted in the delayed implementation of harvest activities until review was completed by DOW. All harvest areas in all SFs that include documented RTE occurrences are/were reviewed by DOW following this delay. Changes to the mitigation measures including those to THSF harvest areas were the result of DOW review.</p> <p>Recognizing that legal requirements that are designed to protect RTE habitat may restrict this FME's ability to be transparent with stakeholders and the public in association with information about documented RTE species, as confirmed through interviews, local experts may have documented additional RTE occurrences. However, until that specific habitat information is shared with the DOW for addition to the database, it is not possible for DOW to understand and consider new sites to determine if any additional protection measures are warranted.</p>

<p>Management of the timber rattlesnake should be more standardized and transparent; ... should follow the precautionary principle; and that guidelines, regulations, and standards should be fully complied with.</p>	<p>Confirmed through document review and interviews that changes to the THSF mitigation measures were the result of DOW review of documented habitat. Protected habitat that overlapped with proposed timber sale areas were reviewed in the field by the audit team. Evidence of prohibited machine access was not confirmed.</p>
<p>Information contained in public records show that inappropriate actions have been taken by Ohio Division of Forestry (DOF) to undermine the review of impacts to the State endangered timber rattlesnake and to marginalize the occurrence of the species in Tar Hollow State Forest (THSF) and perhaps in other state forests. Reviews of timber harvests for impacts to timber rattlesnakes were stopped in January 2014.</p>	<p>Nonetheless, as confirmed through interviews with outside experts and Ohio Div of Wildlife staff and document review, gaps exist in the knowledge of Timber Rattlesnake (RTE) presence/absence, movements and habitat requirements in Ohio. To protect RTE species (Timber Rattlesnake), this FME could consider using a precautionary approach during all forest management activities within southern Ohio including, but not limited to, road maintenance, prescribed fire and timber harvesting. In the absence of other information, there is an opportunity to consider, for example, regional expert information during the planning process, enhanced logger training with respect to rattlesnake protection during timber harvests and other methods used elsewhere in this region and suggested by experts during consultation.</p> <p>See 2015.1, 2015.2, 2015.3 and 2015.4</p>
<p>Formerly, the DOW identified areas with a known or greater probability for the presence of timber rattlesnakes where site-disturbing activities were prohibited. In 2014, this text was eliminated from two Marking Plans in THSF and perhaps from other Marking Plans. It is not clear if both known areas and areas with a greater probability for the presence of the species are still being delineated in the review process. However,</p>	

<p>delineated areas for the two THSF Marking Plans no longer include protection zones.</p>	
<p>A precautionary approach is required ... and is especially relevant to the conservation of timber rattlesnakes since there is limited information on the species in certain state forests. Likewise, as stated in Indicator 6.2.a, if there is the likely presence of the species, management activities are conducted in an appropriate manner...DOF has not used new information on timber rattlesnakes to avoid impacts to the species and important suitable habitat.</p>	
<p>Reviews of potential impacts to timber rattlesnakes are 1) only required by DOF in SSF and not in other state forests where the species is known to occur; 2) not conducted for all DOF management activities; and 3) not reassessed if new information becomes available. Reviews of impacts, including field visits, have not been routinely conducted, if at all, for prescribed burns.</p>	

<p>Four sensitive areas were initially delineated in 2013 on the Marking Plan for Timber Sale # 1506 in THSF. An additional field consultation was conducted by DOW and DOF staff for the two timber harvests in THSF in May 2014; however, a timber rattlesnake biologist did not participate in the field consultation and did not provide site specific recommendations. Nonetheless, only one area was determined to be “high quality potential habitat” and this area will be avoided by equipment. It is not clear who made the high quality habitat determination and subsequent recommendations...delineated sensitive areas in Timber Sale # 1506 were logged and harvesting equipment was also used in some of the delineated areas. (Personal observation). Delineated sensitive areas were covered by slash and areas of dense herbaceous growth, often 6 feet tall, were present on slopes.</p>	
<p>Has communicated with DOF about endangered species that will be harmed by prescribed burns.</p>	<p>See 2015.3 and 2015.4</p>
<p>Emphasis will be placed on oak regeneration</p>	

<p>management practices which will include regeneration harvests coupled with at least two prescribed burns. Additionally, a reduction in fuel loads by prescribed fire has been proposed in Shawnee State Forest (SSF) and perhaps in other state forests.</p> <p>Safeguards to protect timber rattlesnakes during prescribed burns in state forests should be strengthened and not weakened, due to the aforementioned proposed actions.</p>	
<p>'Logging and burning on state forests contribute to...global warming and climate change...increases erosion...contributes to the introduction and spread of exotic invasive species...destroys the aesthetic values-degrading the view-scapes from roads for auto touring, trails for hiking and bridle trails, degrades the back yards of local residents...are social justice issues as the forests are in rural areas with populations that tend to have lower economic means and more dependence on the forest...Shawnee Forest needs to be left alone...'</p>	<p>The FSC Standard allows timber harvests and prescribed fire. Fire and wind are part of the natural disturbance regime of these forest types. Timber harvests are intended to mimic the disturbance regime and are consistent with the 5 year management plan, which includes biodiversity goals and conservation initiatives that are used in setting those goals for the plan. See previous response on rights to own and manage the forest and its resources.</p> <p>The forest products industry generates jobs and revenue in Ohio as cited in section 2.1.3 of this report.</p> <p>While emissions from fire and dead wood do occur as a part of prescribed fire, some of this dead wood cycles into the soil. The openings created promote the establishment and recruitment of oaks and other fire adapted species. Timber harvested in Ohio ends up as a variety of products, some of which may persist in long-term wood products such as furniture and structural lumber. Alternatively, wood may be used to replace higher-emitting materials such as concrete and metals. While not within the scope of FSC, there are methodologies that can be used to estimate the effects of harvested wood products on carbon sequestration, as well as the effect of forest management on other carbon pools http://www.climateactionreserve.org/how/protocols/forest/.</p>
<p>I was told at a DOF open house that there were no</p>	<p>As detailed in LMM Chapters 4, 5, & 6 and annual work plans, forest community types are listed in state forest management plans and prior to</p>

<p>more areas in Shawnee Forest that qualified for HCVF status which seemed to close the door to any further monitoring or assessment of some areas that have not been surveyed properly.</p>	<p>site disturbing activities, field personnel query a variety of databases for the presence of RTE species, using information provided by DOW and ONAP using the Ohio Biodiversity database (that includes information from DOW Wildlife Action Plans for RTE species and Ohio’s list of Endangered and Threatened Plants) and the Historical Society Database. Follow-up surveys are initiated with botanist and biologist if something found or predicted on a database. DOF also maintains a GIS layer of special sites that was assembled internally based on a self-assessment.</p>
<p>Because of the nature of Shawnee State Forest and the presence of HCVF Zone 1A’s, each proposed cut should be surveyed by the Heritage Botanist for the ODNR, and if necessary outside experts employed. The goal of this Indicator (6.2.b) is to be aware of RTE species.</p>	<p>While collaborative monitoring is possible if parties are in agreement, FSC does not explicitly require the involvement of community members in monitoring of HCVs. In some cases this is with good reason, such as to protect the confidentiality of archaeological sites or RTE species. Indicators 8.2.c, 9.4.a, and 9.4.b require the monitoring of HCVF attributes and this step has been completed by this FME. Indicator 9.1.b is describes assessing the presence of HCVs, i.e., the classification of HCVs and this step has been completed by this FME.</p>
<p>If there is indeed a periodic monitoring for the presence of HCVF’s as stated in Ind.8.2.c, should there not be a periodic consultation also with local community members who may have knowledge of the presence of HCVF’s as stated in Ind. 9.1.b.</p>	<p>Part of the Rock Run watershed in the Shawnee SF is designated as an HCVF.</p> <p>The Spruce Run proposed timber sale (described in this stakeholder comment as the Hocking SF pristine hemlock ravine) that is described in the 2016 draft work plan, has been removed from the work plan and is being considered as a zoned area for additional protection.</p>
<p>The Hocking State Forest is small (10,000 acres) and most disturbing is the reluctance on the part of the ODF to preserve older growth areas. It seems that all the larger trees are targeted for cutting. The pristine hemlock ravines that grace the county should be off limits to cutting and protected as old growth forest. Otherwise, where in the Hocking State Forest will</p>	<p>On Hocking SF there are currently 4 HCVF’s (Rhododendron Hollow, Little Rocky Hollow, Sheick Hollow and lower Crane Hollow) – 2 of these are state designated Nature Preserves managed by ODNR – Division of Natural Areas and Preserves. The two HCVF’s under DOF management contained features that meet HCV1 and HCV4 criteria such as watershed protection or rare, threatened, & endangered species, however not HCV3 – the ‘old growth criteria’. The HCVF Assessment and HCV criteria can be viewed on the DOF’s public website at: http://forestry.ohiodnr.gov/portals/forestry/pdfs/certification/HCVFassesment.pdf</p> <p>As confirmed through interviews and document review, part of Rock Run watershed in the Shawnee SF is designated as an HCVF. The HCVF assessment completed during 2010 did not show sufficient characteristics to categorize the entire watershed as an HCVF. Chapter 2 of the LMM notes “The designated Wilderness Area within Shawnee State Forest</p>

<p>there ever be old growth?</p> <p>On the SW edge of Shawnee Forest there exists a beautiful canyon-like hollow known as Rock Run which flows directly into the Ohio River. Most of the lower part of this beautiful hollow is protected by the ARC of Appalachia Preserve System www.arcofappalacia.org, The 237 Ac. that borders the ARC's property is a designated HCVF, 1A. That leaves roughly 750 Ac of Rock Run's unusual 3 forked upper watershed that's a part of Shawnee Forest and susceptible to future logging...the current Draft Work Plan for 2016 about 90 Ac of the watershed shows up on one of the maps as one of the areas being bid out to be marked for future logging bids...The area where the upper watershed transitions into Rock Run's HCVF is a vernal marshy area that the DOF has not given their ...Heritage Botanist the OK to survey for RTE... The upper parts of this watershed are considered possible habitat for the endangered rattlesnake...I would like to present the case that there does possibly exist another area in our forest that at least</p>	<p>qualifies as a High Conservation Value Forest due to its secure protection under Ohio Revised Code. While this area does not meet the ecological definition of old-growth due to the fact it contains roads and has had historic timber harvesting over many years; it will remain protected in perpetuity and therefore will likely exhibit future old-growth characteristics. This sub-zone contains only one area and it meets HCV 3.”</p> <p>As observed throughout public lands in the US and confirmed through interviews, botanists and biologists complete as much field work as is possible. This FME has not specifically ruled out Rock Run or other areas for field surveys.</p> <p>As confirmed through interviews with outside experts and document review, gaps exist in the knowledge of Timber Rattlesnake (RTE) presence/absence, movements and habitat requirements in Ohio. To protect RTE species (Timber Rattlesnake), this FME could consider using a precautionary approach during all forest management activities within southern Ohio including, but not limited to, road maintenance, prescribed fire and timber harvesting. In the absence of other information, there is an opportunity to consider, for example, regional expert information during the planning process, enhanced logger training with respect to rattlesnake protection during timber harvests and other methods used elsewhere in this region and suggested by experts during consultation.</p> <p>See 2015.2, 2015.3, 2015.4</p>
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<p>deserves the chance to be evaluated for protected status...to an existing HCVF or even possibly be considered for RSA status...</p>	
<p>I know that DOF is the only one who can initiate the assessment procedure. This might be a case which shows their unwillingness to periodically monitor or consider the possibility of another area for HCVF assessment.</p>	
<p>I have not seen any mention of RSA's in any context in the DOF management plans...</p>	<p>The RSA analysis was completed in 2010 and the results are summarized on the agency website at: http://forestry.ohiodnr.gov/portals/forestry/pdfs/certification/RSAassessment.pdf.</p> <p>See 2015.6</p>
<p>Invasive flora and fauna are a problem.</p>	<p>See 2015.5 and 2015.9</p>
<p>DNR works from draft plans deep into the fiscal year.</p>	<p>This FME operates under a 5-year management plan; the current 5-year plan covers the period November 2015 – 2020. While the finalization of the more specific annual work plans is sometimes delayed as described elsewhere in this section, this FME's 5-year management plan plus approved harvest plans include required details.</p>
<p>Based on personal observation trees are being damaged by logging equipment along boundaries, haul roads, and landings. Foresters are not monitoring as regularly as they should to detect damage.</p>	<p>The audit team specifically investigated this comment and confirmed conformance to the FSC Standard through observations during field site visits and document review of sale inspection forms. As confirmed through review of site inspection records and interviews, harvest sites are visited at least weekly to monitor. Haul roads and landings, for example, were reviewed for logging damage. Damage is expected to be concentrated along main haul roads and near the landing and damage was found to be acceptable in these areas and uncommon throughout the stands.</p>
<p>“Various consultations occur with wildlife biologists and other experts on potential considerations that need to be made prior to the harvesting” (p. 20, 5 yr, draft work plan).</p>	<p>The Land Management Manual describes the process for management activities to be reviewed prior to harvesting.</p> <p>Forestry staff check to ensure that reviews have been completed and that mitigation measures are documented in the timber sale documents.</p> <p>Long-term impacts are assessed in reference to the zoning designation for long-term management. BMPs, wet weather policy and timber sale</p>

<p>Shouldn't the documentation from the various consultations be reviewed by the manager to assess and document the potential short and long-term impacts of planned management activities?</p>	<p>contract language are used to minimize short-term impacts; reviews are completed by DOW and DOF staff.</p> <p>Long-term ecological viability is managed, for example, with oak savanna restoration, and more broadly, oak management prescriptions that can increase biodiversity.</p>
<p>I question the content of 5 yr. plan as it has to do with pre-harvest assessment and in association with 6.1.c ("field prescriptions are developed and implemented that avoid or minimize negative short-term and long-term impacts; and, maintain and/or enhance the long-term ecological viability of the forest").</p>	
<p>We just wanted to express our support of the Division of Forestry. They are an integral partner of the Fulton SWCD, has assisted us with the Emerald Ash Borer restoration grants, inspection of recently planted oak savannas and windbreaks and instrumental in giving us advice on invasive species, and writes forestry management plans for landowners.</p>	<p>Noted as evidence of conformance.</p>
<p>In May and June 2014, The Ohio Bird Conservation Initiative and its partners held three workshops to train foresters, land managers, and woodland owners on the</p>	

<p>management recommendations found in the "Managing Forest Birds" guide. Sixteen employees of the Division of Forestry attended the workshops and learned how to best manage forest habitat to benefit bird populations. I also gave a presentation on similar material for all of Ohio's Service foresters in 2014...In my interactions with Division of Forestry personnel, they have demonstrated a sincere concern for the quality of Ohio's forest as wildlife habitat. I believe the decisions made regarding the management of Ohio's state forest reflect this.</p>	
<p>The Ohio Department of Natural Resources – Division of Forestry (ODNR-DOF) is in the process of possibly granting an easement for the NEXUS - interstate natural gas transmission pipeline to pass through a portion of the Maumee State Forest. It is officially known by the ODNR as: Subject: 14-768 NEXUS Gas Transmission Project. The Maumee State Forest is located in a portion of Northwest Ohio known as the "Oak Openings" ... a "globally rare habitat".</p>	<p>NEXUS Gas Transmission LLC currently has a department issued Right-of-Entry to conduct legal and biological surveys for a potential pipeline project. There is no proposed pipeline currently; only a biological survey has been initiated.</p> <p>The Division has expressed its concern associated with high recreational use and known rare, threatened, and endangered species with the NEXUS project team. The NEXUS survey corridor has been amended partially based upon these concerns.</p> <p>The Division will review all biological survey information when it becomes available. The survey corridor, which is not yet formally proposed as a potential pipeline corridor, does not contain any DOF designated HCVF's.</p> <p>The Oak Openings region contains several examples of globally rare communities, but it is not yet clear whether or not the proposed corridor includes any of these communities. Potential locations for the pipeline have been considered and adjusted in an effort to minimize impacts. A pending proposal includes a plan for a natural gas pipeline (Nexus pipeline) to go through the east side of Compartment A2.</p> <p>The audit team reviewed documents and as confirmed through interviews,</p>

	the most recent planned route for the pipeline will not cross Compartment C3, where management efforts are underway to restore an oak savanna remnant. On-site review is completed before any final easements are granted.
'...Forestry lies to the public it serves...falsely charging an individual with arson in the 6-day, 3,000 acre fire of April 24, 2009...and by omission, like failing to put things in the one and five year work plans: information like budgets, projects like shooting ranges, decisions like Ohio Revised Code law changes.	<p>Events associated with the 2009 fire preceded FSC Certification and are the subject of legal proceedings.</p> <p>Ohio Revised Code changes are part of the legislative process, and as such, are not part of ODNR's administrative process.</p> <p>See 2015.1 and 2015.2</p>

4. Results of The Evaluation

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

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

Principle / Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> Employees are knowledgeable about relevant local, state, and federal laws that pertain to forest management; violations of relevant statutes have not been reported in recent years. 	None detected.
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> Public access is encouraged for a variety of recreational activities. Legal rights to agency lands are clearly established; boundaries are well-marked. 	None detected.
P3: Indigenous Peoples' Rights	<ul style="list-style-type: none"> Field staff are trained and knowledgeable about archeological and cultural sites and appropriate actions are implemented to protect these 	None detected.

	<p>sites during management operations.</p>	
P4: Community Relations & Workers' Rights	<ul style="list-style-type: none"> • Employees and contractors express satisfaction with wages, benefits and working conditions. Tenure of employees confirms favorable working conditions. Loggers express good communication with foresters. 	OBS 2015.1
P5: Benefits from the Forest	<ul style="list-style-type: none"> • Utilization of products is excellent and local markets are diverse. • USFS cooperation on the Experimental Forest has diverse breadth of research. 	OBS 2015.2
P6: Environmental Impact	<ul style="list-style-type: none"> • Effective use of GIS database allows initial screening for sensitive resource areas. • Desired future conditions have been established. • Rare communities and unique stand types are protected. • Forest management seeks to restore and maintain natural stand dynamics; non-native invasive species are not common. • Stream crossings are well avoided by careful trail layout. 	OBS 2015.3, OBS 2015.4, CAR 2015.5, CAR 2015.6, CAR 2015.7, CAR 2015.8
P7: Management Plan	<ul style="list-style-type: none"> • The management plans are current and cover each of the required elements. 	CAR 2015.9
P8: Monitoring & Assessment	<ul style="list-style-type: none"> • Careful records are maintained of harvest volumes and insect/pest/weather related losses. • Monitoring activities take place continually and are routinely incorporated into the allowable harvest calculations. • Supervision and post-harvest close-out activities are effective and constitute a form of monitoring that is responsive to 	OBS 2015.10, CAR 2015.11, CAR 2015.12, and CAR 2015.13.

	this section of the Standard.	
P9: High Conservation Value Forests	No exceptional instances noted.	None detected.
Chain of custody	<ul style="list-style-type: none"> Tracking records are complete. 	OBS 2015.10, CAR 2015.11, CAR 2015.12, and CAR 2015.13.

4.2 Process of Determining Conformance

4.2.1 Structure of Standard and Degrees of Nonconformance

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

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

4.2.1 Interpretations of Major CARs, Minor CARs and Observations

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

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

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

4.2.2 Major Nonconformances

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

4.2.3 Existing Corrective Action Requests and Observations

Finding Number: 2014.1	
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 type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): no deadline
FSC Indicator:	FSC-US indicators 4.4.b and 4.4.d.
Non-Conformity (or Background/ Justification in the case of Observations): Through interviews with DOF staff, it was found that staff changes within DOF, DOW, and even stakeholder organizations have led to differing levels of contact with some of DOF’s stakeholders. While events such as open houses occur on a regular basis, DOF staff said that there they used to have more periodic contact with various stakeholder groups outside of these formal meetings. DOF is also considering a few significant updates and changes to management planning, which will require stakeholder consultation.	
Corrective Action Request (or Observation): DOF should ensure that the intensity of its stakeholder outreach efforts are scaled to new and/or changing conditions so that it can continue to seek and consider input in management planning from people who would likely be affected by management activities.	
FME response (including any evidence submitted)	[DOF] There have been a number of staff changes within DOW in the past year that have resulted in new contact persons for T&E species, Wildlife Mgmt, and Heritage Database. There are now approximately 4 DOW staff that we work with. DOF has held specific consultations with the Ohio Environmental Council, the Ohio Horsemen’s Council, Ohio Chapter of the Sierra Club, and motorized trail groups regarding proposals at state forests. There has been an overall increase of consultations in the past year.
SCS review	<p>Four DOW staff now work in conjunction with DOF, though increased communication needs to occur on a regular basis. During the audit, per phone conversation with DOW and auditors, DOW said they were available to the audit team on multiple days; however, there were problems in communication and DOF thought DOW was not available. Per interviews with both DOF and DOW staff, communication is improving.</p> <p>Examples of increased communication with stakeholders:</p> <p>Mining proposal on Perry SF, reached out to the ATV participants as there are ATV trails in the area.</p> <p>Forest Advisory Council – members change per Governor appointment and this works as an advisory council, stakeholders from a multitude of backgrounds are on the Council.</p> <p>Open Houses – news releases sent out, emails to stakeholder list, direct mailings to folks without email. Attendance has been 6 to 30 people regularly; timeframe of open houses is 4:30 to 6:30 pm in July.</p> <p>Maumee – 40 attendees with gas line issue (with motorized trails)</p> <p>New Philly – 9 attendees</p> <p>Mohican SF - Formally had a meeting with 3 Bridle Trails groups regarding changes</p>

	<p>that affected them – positive results with new parking lot, day use, & camping area. Timber sales that affect roads/trails – Bridle Trail users/mtn. bike groups/UTV-ATV groups/etc. will receive an email in advance of the harvest. ODNR website notes trail closures in large print.</p> <p>This 2014 OBS is considered closed at the conclusion of the 2015 audit and a 2015 OBS has been issued for a related issue.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i></p>

Finding Number: 2014.2	
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 type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US indicators 6.3.f, 6.3.g.1.a (FSC APP) and 6.3.g.2.
<p>Non-Conformity (or <i>Background/ Justification in the case of Observations</i>):</p> <p>On deferment and other even-aged management operations, the auditors observed removal of most trees from dominant canopy classes of dominant species (e.g., Pike Sale 1301, and Brush Creek Sales A-37 and A-39).</p> <p>Indicator 6.3.f states that trees selected for retention are generally representative of the dominant species found on the site, in addition to describing other retention-tree requirements (e.g., legacy trees, snags, trees with declining health, course woody debris, etc.). While retention of vigorous co-dominants provides future recruitment for elements of 6.3.f, the removal of dominant canopy classes may result in the loss of trees that will be available sooner as den trees, snags, tip-ups, and other retention elements.</p> <p>While even-aged management indicators may offer some flexibility in retention requirements (see FSC APP 6.3.g.1.a and 6.3.g.2), it is expected that conformance be maintained to both 6.3.f and 6.3.g.1.a. Hence, there is an opportunity to identify trees from dominant canopy classes that meet one or more retention elements as described in 6.3.f while still meeting regeneration and operational objectives for even-aged management.</p> <p>It was noted on Pike Sale 1301 that the layout of the shelterwood preparation cut area may lead to a reduced need for within-harvest unit retention of dominant canopy classes; this area had an un-entered SMZ and hill-top harvest boundary with dominant canopy trees retained. Since the unit was long and relatively narrow, additional retention of dominant canopy classes of dominant species may yield little additional ecological benefit at the expense of increased operational inefficiency and safety risk.</p> <p>Corrective Action Request (or <i>Observation</i>):</p> <p>In consultation with DOW and other wildlife or ecology experts, DOF should analyze its retention guidelines for dominant canopy classes and species of trees that may meet multiple retention objectives within even-aged harvests while meeting objectives for regeneration.</p> <p>Variables to consider for these dominant canopy classes may include, but are not limited to, the short- and long-term recruitment of:</p> <ul style="list-style-type: none"> • Large live trees, live trees with decay or declining health, and snags; • Course and dead woody material; and • Wildlife habitat (e.g., den trees, tip-ups, loose-bark). <p>Variables that may influence meeting both regeneration and retention objectives:</p>	

<ul style="list-style-type: none"> • Dispersed or clumped retention; • Obligatory within stand retention (e.g., SMZs, vernal pools); • Position of retention elements in relation to skid trails, landings and other harvest infrastructure; • Size and layout of harvest units; and • Habitat connectivity. 	
<p>FME response (including any evidence submitted)</p>	<p>[DOF] We believe there was some confusion in this observation. 6.3.f refers to “dominant species”, while the observation above refers to the dominant <i>canopy</i> class. DOF retention guidelines clearly state “leave trees shall be of preferred species – oak and hickory – and shall be healthy enough to predictably live 20 or more years”. Furthermore, retention guidelines also state “intermediate or co-dominant (or some dominant) in crown class”. The entire suite of guidelines including retention guidelines, SMZ guidelines, biomass retention guidelines, etc. seem to cover all bases so that we comply with 6.3 and associated indicators.</p>
<p>SCS review</p>	<p>Leave trees left, but not in the harvest area per say. Retention left was “co-dominant trees” per observations last year. Based on prescriptions reviewed and field observations, the audit team feels adequate retention is maintained in harvest areas and the combined retention guidelines meet objectives for regeneration within even-aged harvests.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 2014.3	
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 type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US indicator 6.5.e.1.
Non-Conformity (or Background/ Justification in the case of Observations): DOF's response to Minor CAR 2014.3 includes updated guidelines for SMZ buffer widths. State foresters use the Division of Forestry Land Management Manual to guide most BMPs. Ephemeral and intermittent streams are defined in the State's separate BMP manual (Bulletin 916, 2004) and receive the same levels of protection per the Division of Forestry Land Management Manual. In certain areas, such as SMZ widths, the Division of Forestry Land Management Manual exceeds the State's BMP recommendations. In practice, foresters use both documents.	
Corrective Action Request (or Observation): DOF should consider citing definitions for perennial, intermittent, and ephemeral streams in its Division of Forestry Land Management Manual.	
FME response (including any evidence submitted)	[DOF] definitions of perennial, intermittent, ephemeral and wetland areas are now part of the land management manual.
SCS review	Definitions from OH BMP 2004 publication added into LMM, provided as a 1 page response, and added to the main manual.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

4.2.4 New Corrective Action Requests and Observations

Finding Number: 2015.1	
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 type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC US Forest Management Standard V1-0, Indicator 4.4.b (see also 9.1.b).

Non-Conformity (or Background/ Justification in the case of Observations):	
As confirmed through interviews with DOF staff, DOW staff and stakeholders, staff changes within DOF, DOW and stakeholder organizations have led to varying degrees of communication with some stakeholders. While events such as open houses occur on a regular basis, stakeholders express dissatisfaction with the overall process.	
Corrective Action Request (or Observation):	
FME should ensure that the methods used to conduct stakeholder outreach are scaled to new and/or changing conditions so that it can effectively to seek and consider input in management planning from people who would likely be affected by management activities.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2015.2	
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 type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC US Forest Management Standard V1-0, Indicators 5.4.a and 5.4.b
Non-Conformity (or Background/ Justification in the case of Observations):	
FME provides a wide variety of non-timber forest products and services in conformance with this indicator. However, stakeholders' comments mention that the FME's emphasis on timber harvesting is perceived to be in contrast to the value of the other non-timber products and local economic uses of the forest (including for example ecotourism, hiking, wildlife protection, fishing and hunting) at Shawnee SF. There is an opportunity to improve staff understanding/consideration of recreational interests and use of the Shawnee SF.	
Corrective Action Request (or Observation):	
For public lands, diversification of the economic use of the FMU is a requirement and includes, but is not limited to, recreation, ecotourism, hunting, and fishing. FME should demonstrate knowledge of their operation's effect on the local economy as it relates to existing and potential markets for a wide variety of non-timber forest products and services and strive to diversify the economic use of the forest.	
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>
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Finding Number: 2015.3

Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation
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FMU CAR/OBS issued to (when more than one FMU):
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Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
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FSC Indicator:	FSC US Forest Management Standard V1-0, Indicator 6.1.b
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Non-Conformity (or Background/ Justification in the case of Observations):	
<ol style="list-style-type: none"> 1) As confirmed through interviews and document review, FME uses many different datasets during the process of identifying sites that may include RTE species, which requires coordination and review of information from a variety of sources. 2) OH DNR DOW reviews potential harvest plans and develops mitigation measures for RTE species and their habitats. DOW needs to receive draft harvest plans from DOF in a timely manner, well before the annual stakeholder open house is scheduled in order to adequately review harvest plans and suggest mitigation measures. While DOW staff are knowledgeable of commonly prescribed mitigation measures, stakeholders had questions on specific sites that staff were unable to address satisfactorily in some cases. To ensure that staff are fully knowledgeable of specific site concerns, DOW may require more time to review planned management activities for RTE species attributes according to interviews - anywhere from 3-6 months in advance of the annual open house. 	

Corrective Action Request (or Observation):	
In order to expedite the process of assessing and documenting the potential short and long-term impacts of planned management activities on RTE species prior to commencing site-disturbing activities: <ol style="list-style-type: none"> 1) While offering similar or better levels of its current performance, FME should consider working with other agency staff to identify opportunities to make the RTE review process more efficient. 2) FME should consider sending draft harvest plans to DOW for review well in advance of the annual stakeholder open house. 	

FME response <i>(including any evidence submitted)</i>	
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SCS review	
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Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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Finding Number: 2015.4	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC US Forest Management Standard, V1-0, 6.2.a
Non-Conformity (or Background/ Justification in the case of Observations): As confirmed through interviews with outside experts and document review, gaps exist in the knowledge of Timber Rattlesnake (RTE) presence/absence, movements and habitat requirements in Ohio.	
Corrective Action Request (or Observation): 1) To protect RTE species (Timber Rattlesnake), FME could consider using a precautionary approach during all forest management activities within southern Ohio including, but not limited to, road maintenance, prescribed fire and timber harvesting. 2) In the absence of other information, there is an opportunity to consider, for example, regional expert information during the planning process, enhanced logger training with respect to rattlesnake protection during timber harvests and other methods used elsewhere in this region and suggested by experts during consultation.	
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: 2015.5	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard V1-0, Indicators 6.3.h, parts 1 & 2

<p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>Interviews, observations and document review confirm that non-native invasive plants are common in this landscape and FME collects information about the presence of non-native plants during inventory and other management activities. Funding has been available and used in the past for population control and a new funds are now available for future control measures.</p> <p>However, the locations of non-native invasive plants are stored as comments on paper forms and the FME has not yet developed a method to determine the extent or degree of threat.</p> <p>Furthermore, FME has not implemented a management practice that will minimize the risk of non-native invasive plant establishment, growth and spread.</p> <p>In addition, USFS research conducted on Tar Hollow SF, for example, and other readily accessible research findings have established a relationship between the presence of fire and the spread of Tree-of-heaven (<i>Ailanthus altissima</i>). Paulownia (<i>Paulownia tomentosa</i>) is another species that has been documented to spread following fire.</p> <p>Finally, during the 1412 and AF Merch A-6 field visits, cattails and rushes were observed by the audit team and not identified by field staff prior to harvest per interview with the forester. The cattails (<i>Typha</i> spp.) observed by the audit team were NOT confirmed to be Narrow-leaved and hybrid Cattail (<i>Typha angustifolia</i>, <i>T. x glauca</i>) however <i>T. angustifolia</i> is included in the list of Invasive Plants of Ohio and field staff are not aware of this species.</p>	
<p>Corrective Action Request (or Observation):</p> <p>FME shall develop a method to determine the extent or degree of threat of non-native invasive plants and implement management practices that minimize the risk of non-native invasive plant species' establishment, growth and spread.</p>	
<p>FME response (including any evidence submitted)</p>	
<p>SCS review</p>	
<p>Status of CAR:</p>	<p><input type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 2015.6	
<p>Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation</p>	
<p>FMU CAR/OBS issued to (when more than one FMU):</p>	
<p>Deadline</p>	<p><input type="checkbox"/> Pre-condition to certification</p> <p><input type="checkbox"/> 3 months from Issuance of Final Report</p> <p><input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation)</p> <p><input type="checkbox"/> Other deadline (specify):</p>
<p>FSC Indicator:</p>	<p>FSC US Forest Management Standard V1-0, Indicator 6.4.b</p>

Non-Conformity (or Background/ Justification in the case of Observations): FME's RSA analysis did not include an analysis of successional stages (RSA purpose 2) and large FMUs are generally expected to establish RSAs of purpose 2 within the FMU.	
Corrective Action Request (or Observation): Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest managers whose properties are conducive to the establishment of such areas, shall designate ecologically viable RSAs to serve these purposes. Large FMUs are expected to establish RSAs of purpose 2 within the FMU.	
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: 2015.7	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard V1-0, Indicator 6.5.b
Non-Conformity (or Background/ Justification in the case of Observations): <u>On Richland Furnace State Forest at Audit Site 5 the APV Trail between Points 2 and 3 has waterbars that are directing road water and sediment towards a pond.</u> The trail had been deeply incised into the hillside, so large waterbars were constructed to drain the trail. Three of the waterbars directed water to the side of the road where there is a man-made pond, and some sediment from one of the waterbars has traveled through the filter strip and entered the pond. The lowest waterbar, while not delivering sediment to the pond, has a very short distance between the outfall of the waterbar and the pond edge (less than 5 feet). The site is shaped such that one or more waterbars should have been constructed to direct water to the side of the road away from the pond.	
Corrective Action Request (or Observation): Forest operations shall meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	
FME response (including any evidence submitted)	DOF is committed to good BMP's and once this issue was found we immediately mobilized a crew to fix these three waterbars. DOF evidence provided: November 2 email from Nate Jester, District Manager that the waterbars have been fixed, and photos of the newly constructed waterbars.

<p>SCS review</p>	<p>SCS reviewed the email and photo records, thus confirming implementation of the corrective action.</p> 
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)</p>

<p>Finding Number: 2015.8</p>	
<p>Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation</p>	
<p>FMU CAR/OBS issued to (when more than one FMU):</p>	
<p>Deadline</p>	<p><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):</p>
<p>FSC Indicator:</p>	<p>FSC US Forest Management Standard V1-0, Indicator 6.7.c</p>
<p>Non-Conformity (or Background/ Justification in the case of Observations): One unlabeled container with a broken cap and containing an unknown liquid chemical was observed in the garage storage area of Shawnee SF.</p>	
<p>Corrective Action Request (or Observation): Hazardous materials and fuels shall be stored in leak-proof containers in designated storage areas.</p>	
<p>FME response (including any evidence submitted)</p>	
<p>SCS review</p>	
<p>Status of CAR:</p>	<p><input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 2015.9	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC US Forest Management Standard V1-0, Indicator 7.3.a
Non-Conformity (or Background/ Justification in the case of Observations): <p>During site visits to Sale 1412 and AF Merchandising Sale A-6, wetland plants were identified in small areas next to and across main skid trails that did not appear on routine surveys or in the database review as a mapped wetland.</p> <p>During the 1412 field visit, cattails and rushes were seen on both sides of and in the skid road next to the retained rock outcrop, adjacent to the large central landing. Per interview with the forester, wetland plants were not identified prior to the harvest, but the spot was wet and mats were used to cross it.</p> <p>During the AF Merch A-6 field visit, cattails were identified next to and in the skid road downhill of the main access road. Per interview with the forester, this area was dry and wetland plants not present prior to or during the sale.</p> <p>Cattails (<i>Typha</i> spp.) were observed by the audit team and while NOT confirmed to be present during site visits, Narrow-leaved and hybrid Cattail (<i>Typha angustifolia</i>, <i>T. x glauca</i>) are included in the list of Invasive Plants of Ohio.</p>	
Corrective Action Request (or Observation): Forest workers should be provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2015.10	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input checked="" type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS Forest Management Chain of Custody Indicator 1.Quality Management (1.1, 1.2, 1.4, 1.5), FSC US Forest Management Standard V1-0, Indicator 8.3.b.
Non-Conformity (or Background/ Justification in the case of Observations):	
<p>1.1: A management representative has not been appointed per document review.</p> <p>1.2: Training has not been implemented for part-time/seasonal loggers (as a result training records are not maintained). Complete volume records were not available.</p> <p>1.4: Insufficient control is present for material that is sold under a Merchandised Product sale. Material travels off-FMU to a commercial scale before returning to one of DOF's concentration yards, prior to sale, resulting in a risk that non-certified material could be mixed with certified forest product prior to the transfer of ownership.</p> <p>1.5: CoC requirements are not being met. Some materials are transported off the FMU prior to being received at the FME's sawmill and materials are not identifiable or separable, per description of the mill site, by DOF Staff. There is a risk that non-certified material can enter the supply chain, as these materials are processed by the (OH DNR) Zaleski Sawmill prior to transfer of ownership.</p>	
Corrective Action Request (or Observation):	
<p>FME shall appoint a management representative.</p> <p>FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.</p> <p>FME shall have sufficient control present for material that is sold as a Merchandised Product sale to ensure there is no risk of mixing FSC-certified product (logs and lumber) with material (logs and lumber) from outside of the scope prior to transfer of ownership.</p> <p>FME shall not process material without conforming to applicable CoC requirements.</p>	
FME response (including any evidence submitted)	<p>ODNR- Division of Forestry CoC program is outlined in Chapter 13 of the Land Management Manual (attached).</p> <p>1.1 A CoC representative has been appointed</p> <p>1.2 Procedures have been updated to ensure records are retained</p> <p>1.3 Control of products harvested under Merchandising sales has been established via contract requirements with the service contractors.</p> <p>1.5 Zaleski sawmill document for consideration.</p>
SCS review	SCS confirmed via review of the COC program manual that items 1.1, 1.4 and 1.5 have been met due to the creation of the manual and the creation of a contract addendum and updated trip/ shipping tickets. The manual contains a training plan and the stipulation that records be maintained for at least 5 years (1.2). Volume records were provided to close 2015.11.

Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
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Finding Number: 2015.11

Select one: Major CAR Minor CAR Observation

FMU CAR/OBS issued to (when more than one FMU):

Deadline	<input checked="" type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
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FSC Indicator:	SCS Forest Management Chain of Custody Indicator 2. Product Control, Sales, & Delivery (2.1, 2.2, 2.3, 2.4)
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Non-Conformity (or Background/ Justification in the case of Observations):

2.1: Logger has a trip ticket that notes load number, a Forest location (general location noted, such as Brush Creek), what scale they are traveling to, and empty & scaled weight. Trip Tickets Load #s: 21, 22, 23, & 24 from Brush Creek with Products of both "Wood" or "Stringers" do not have any FSC information noted on the trip ticket. Wood/Stringers leaving the landing are not identifiable as certified once they leave the Forest gate.

2.2: Volumes of logs sold and what is sold as certified, were not compiled for the audit, examples of detailed sale information were viewed in the provided "Report Timber Sale" spreadsheet.

2.3: The FME has not ensured that all sales documents issued for outputs sold with FSC claims include the contact details of their organization, Invoice/Receipts viewed for logs sales on 05/18/15, 04/27/15, 02/23/15 and lumber from 05/16/12. In instances where the receipt/invoice does not travel with the logs when sold from a DOF concentration yard, shipping documentation is not provided or maintained.

2.4: Shipping documents are not used, but material may travel by a carrier that does not receive the receipt/invoice.

Corrective Action Request (or Observation):

FME must ensure that products from the certified forest area shall be identifiable as certified at the forest gate.

FME shall maintain records of quantities/volumes of FSC-certified products.

FME shall ensure that all sales documents issued for outputs sold with FSC claims include the contact details of their organization. If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other shall be included.

FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product.

FME response <i>(including any evidence submitted)</i>	ODNR- Division of Forestry CoC program is outlined in Chapter 13 of the Land Management Manual (attached). 2.1 Trip tickets have been updated to include all the necessary information and FSC language (attached). 2.2 DOF is now tracking volumes sold as certified via the spreadsheet "Report Timber Sale" , which is what used to track all timber sale activities. It has a number of tabs at the bottom. Relating to 2015.11, the tabs of interest are the "FY16 load records" and "FY16 Log Sales". 2.3 All sale documents now include the required information, including the DOF invoice/receipt for merchandising logs 2.4 Shipping ticket travel with the load at the time of transfer of ownership
SCS review	SCS confirmed that trip/ shipping tickets and receipts for merchandizing logs were updated to include FSC information correctly. Procedures now reflect all forest gates. A sample of the Timber Sale Report was reviewed and included information on volumes sold as certified (or not).
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2015.12	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): before recertification
FSC Indicator:	SCS Forest Management Chain of Custody Indicator 3. Labeling and Promotion (3.1)
Non-Conformity <i>(or Background/ Justification in the case of Observations):</i> 3.1: The OH DNR website, www.forestry.ohdnr.gov/forestmanagement incorrectly includes an on-product label (FSC 100%) instead of the correct use of the promotional panel. FSC and Forest Stewardship Council are also present on the website and do not include the required ® trademark symbol after the first use in the text. An email record shows that FME received feedback on incorrect trademark use from SCS, but that the website was not altered as it was outside of the FME's control (general DNR staff handle updates to the website).	
Corrective Action Request <i>(or Observation):</i> FME shall implement the authorized use of the FSC label and trademark uses from SCS Global Services for the use of FSC trademarks for promotional use on the company website.	
FME response <i>(including any evidence submitted)</i>	The correct logo will be placed on our website asap.

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: 2015.13

Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation
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FMU CAR/OBS issued to (when more than one FMU):
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Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): before recertification
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FSC Indicator:	SCS Forest Management Chain of Custody Indicator 5, Training and/or Communication Strategies, 5.1 and 5.2.
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Non-Conformity (or Background/ Justification in the case of Observations):
 Training has not been implemented for part-time/seasonal loggers (as a result raining records are not maintained). This is important for timber sales that end up providing material for the DNR’s sawmill.

For all other timber sales, annual training on administering timber sale contracts ensures compliance to FSC’s chain of custody requirements (DOF training completed 10/01/15, confirmed with a review of signed training logs and materials presented).

Corrective Action Request (or Observation):

5.1 All relevant FME staff and outsourcers shall be trained in the FME’s COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME’s COC control system.

5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).

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

Certification Recommendation	
FME be awarded FSC certification as a “Well-Managed Forest” subject to the minor corrective action requests stated in Section 4.2.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols. If certification is recommended, the FME has satisfactorily demonstrated the following without exception:	
FME has addressed any Major CAR(s) assigned during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
FME has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this report) are met over the forest area covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	

SECTION B – APPENDICES (CONFIDENTIAL)

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

The past year actual timber harvested totaled 12.1 million board feet or 28% of growth.

10 yr rolling average harvest levels are 9,972,736 board feet or 24% of growth.

5 yr rolling average harvest levels are 11,305,994 board feet or 27% of growth.

The timber products from Ohio’s state forests are composed of over 20 different tree species. Average annual harvest levels over the last ten years (9,972,736) approximately fall into the following main commercial species groups:

3,989,094 board feet Quercus alba / Quercus prinus

2,500,459 board feet Quercus velutina / Quercus rubra / Quercus coccinea

1,994,547 board feet Liriodendron tulipifera

498,636 board feet of Acer spp.

990,000 board feet of miscellaneous species

59,998 tons of pulpwood

Projected annual harvest levels are anticipated to remain similar to the previous ten years and will be limited each year to no more that 40% of the calculated annual growth.

Appendix 2 – List of FMUs Selected for Evaluation

FME consists of a single FMU

FME consists of multiple FMUs or is a Group

Appendix 3 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Chad Sanders	Certification Coordinator; Forest Manager, Mohican SF	Chad.Sanders@dnr.state.oh.us	Interview/Field Consultation
Greg Guess	Deputy Chief, State Forest and Fire	Gregory.Guess@dnr.state.oh.us	Interview/Field Consultation
Dan Balsler	Assistant Chief	614.265.6694	Interview/Field Consultation
Robert Boyles	Chief State Forester	614.265.6694	Interview/Field Consultation
Gregg Maxfield	District Manager, Northern Forests	614.265.6694	Interview/Field Consultation
Nate Jester	District Manager, Southern Forests	614.265.6694	Interview/Field Consultation

Jared Craig	Southern Land Management Admin. Forester	614.265.6694	Interview/Field Consultation
Sue Howard	Acting Chief, Division of Wildlife	614.265.6694	Interview/Field Consultation
Brian Kelly	Forest Manager, Scioto Trail SF	614.265.6694	Interview/Field Consultation
John Bauerbach	Forester, Scioto Trail SF	614.265.6694	Interview/Field Consultation
Dale Egbert	Forest Manager, Shawnee SF	614.265.6694	Interview/Field Consultation
David Parrott	Forester, Shawnee SF	614.265.6694	Interview/Field Consultation
Cotton Randall	Landowner Assistance	614.265.6694	Interview/Field Consultation
Courtney Cawood	Forest Manager, Vinton Furnace, Zaleski, & Gifford SFs	614.265.6694	Interview/Field Consultation
Danzil Walker	Forester, Athens & Zaleski SF	614.265.6694	Interview/Field Consultation
Christopher Kerr	Forest Tech, Vinton Furnace SF	614.265.6694	Interview/Field Consultation
William Borovickas	Supervisory Forestry Technician, USDA FS NRS02 Vinton Furnace SF	614.265.6694	Interview/Field Consultation

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Mike Reynolds	ODNR-DOW, Wildlife Research Program Administrator	740.589.9921	Phone Interview	Y
Kate Parsons	ODNR-DOW, Endangered Species and Terrestrial Wildlife Program Administrator	614.265.6329	Phone Interview	Y
Joanne Rebbeck	Research Scientist, USDA FS Northern Forest Experiment Station	740.368.0054	Interview/Field Consultation	Y
Keith Sickles	Sickles & Sons Logging	740.286.8880	Interview/Field Consultation	N
Michael Sissel	Logger	740.858.4613	Interview/Field Consultation	N

Other stakeholders were interviewed via phone or email and records are maintained with SCS.

Appendix 4 – Additional Evaluation Techniques Employed

No additional evaluation techniques were employed.

Appendix 5 – Certification Standard Conformance Table

C= Conformance with Criterion or Indicator

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

NC= Nonconformance with Criterion or Indicator

NA= Not Applicable

REQUIREMENT	C/NC	COMMENT/CAR
<p>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.</p>		
<p>1.1 Forest management shall respect all national and local laws and administrative requirements.</p>	<p>C</p>	
<p>1.1.a Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.</p>	<p>C</p>	<p>List of relevant laws are incorporated into Chapter 1 of the Land Management Manual (LMM).</p> <p>State Forest plans include a section on law compliance.</p> <p>DNR exhibits strong commitment to conforming to laws, rules, and regulations. DOF code & forest rules reviewed annually and are part of new forester training, as confirmed by a review of training records from employee Egbert’s 10/23/15 and new forester Parrott’s training records from 2014-15.</p> <p>Numerous inquiries revealed no enforcement actions in recent years against DNR related to compliance with applicable federal, state, or local forestry and related environmental laws and regulations. Documentation relating to the 2013 Tipton dispute and appeal was reviewed.</p> <p>Bray Site BMP complaint was investigated and there was no violation. The Bray site timber sale was reviewed; internal communications, field visits, and</p>

		<p>inter-agency communication (DOF and NRCS) were documented and reviewed to ensure that BMPs and corresponding laws and regulations were in compliance. Ohio Division of Forestry decided to address some issues that did not arise to the level of a violation.</p> <p>The rolling 5-year average remains well below growth (25% of growth) and thus extremely modest when compared to sustained yield. The growth rate is just over 41 MMBF; the AAH is 16 MMBF and is summarized in DOF’s “Harvest Levels by Year” spreadsheet. Currently, the 5-year average harvest is 11,305,994 BF and the 10 year average is 9,972,736 BF.</p>
<p>1.1.b To facilitate legal compliance, the <i>forest owner</i> or <i>manager</i> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	<p>C</p>	<p>A list of relevant natural resources laws, treaties, and agreements are outlined for all managers in Chapter 1 (State Forest Management Authority) of the LMM. Every forester has a copy of this 3-ring binder, and updates are provided by the central office as needed and during the annual refresher training. Laws and regulations are also available on-line on the Ohio Division of Forestry’s web site. OH BMP Manuals were readily available in the central office and carried by foresters in the units.</p> <p>Illegal activities – Regional Law enforcement officers and investigators work with the DOF to address issues on State Forest lands. Confirmed with document review of email exchanges between DOF staff and law enforcement officers.</p> <p>Ohio Master Loggers are required on all timber sales. Prior to each harvest, there is a meeting with buyer to review sale conditions and contract.</p>
<p>1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</p>	<p>C</p>	
<p>1.2.a The forest owner or manager provides written evidence that all applicable and legally prescribed fees,</p>	<p>C</p>	<p>The Department’s accounts payable are kept appropriately current. A letter signed by the Chief of the Division stating the nature and timing of</p>

<p>royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.</p>		<p>payments made the previous fiscal year was furnished on October 13, 2015, confirmed through document review including for example invoice processing forms, voucher records and cancelled check #s 0027661123, 0027621668, and 0027621230.</p> <p>Each timber sale’s documentation contains calculations of the distribution of each sale’s proceeds based on analysis of sale maps and political jurisdiction.</p>
<p>1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</p>	<p>C</p>	
<p>1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.</p>	<p>C</p>	<p>All international agreements are respected. List of relevant international agreements are noted in the LMM. No violations on record based on self-assessment or field visits and document review.</p>
<p>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.</p>	<p>C</p>	
<p>1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.</p>	<p>C</p>	<p>A written statement contained in Chapter 1 of LMM answers this requirement as a matter of policy.</p>
<p>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</p>	<p>C</p>	
<p>1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest</i></p>	<p>C</p>	<p>Ohio Administrative Code 1501:3 sets forest rules and visitation policy. State Forest Boundary Marking policy ensures that DOF is actively marking boundaries. Boundary marking is a regular scheduled duty of each unit. Timber harvest prep chapter of</p>

<p>Management Unit (FMU).</p>		<p>LMM includes language on marking of timber harvest boundaries.</p> <p>DOF has a fully funded Law Enforcement and Recreation program. There are 10 commissioned officers with responsibility to enforce forest rules and laws. Officers are responsible for patrols and custody of the forest. Law enforcement maintains special operations regarding theft, drugs, arson, and illegal ATV use.</p> <p>The Special Use Permit process ensures groups comply with laws and rules.</p> <p>Signs and gates were regularly observed to be utilized on the state forests during the field audit. Communications between law enforcement officers and DOF staff occurs and was confirmed by a review of emails about issues/potential issues over the past year.</p>
<p>1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.</p>	<p>C</p>	<p>All state forests are covered by law enforcement officers from the Division of Parks who enforce forest rules and Ohio laws on state forest lands. In 2014, DOF documented a timber theft issue on Pike State Forest. Information was gathered and sent to Law Enforcement, which subsequently sent information to the prosecutor that issued a fine (restitution) and court costs for the stolen trees.</p> <p>Prosecutions, citations, special use permits. Vinton Furnace Timber theft was enforced and went to lawsuit stage. Documentation noted that tracks the process and attempted resolution/court case results.</p>
<p>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p>	<p>C</p>	
<p>1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC</p>	<p>C</p>	<p>The Directive from Governor Strickland, October, 25, 2007 is directly responsive to this Indicator. There is a written statement of commitment from Chief</p>

<p>Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.</p>		<p>included in the LMM for all state forest staff and posted on the internet for public viewing Certification costs are listed as a line item in budgets. Letter dated 5.20.10 signed by the Chief.</p>
<p>1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.</p>	<p>NA</p>	<p>All 21 of Ohio’s State Forests are in the scope of the certification evaluation.</p>
<p>1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.</p>	<p>NA</p>	<p>No such changes this audit year.</p>
<p>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p>	<p>C</p>	
<p>2.1.a The forest owner or manager provides clear evidence of <i>long-term</i> rights to use and manage the FMU for the purposes described in the management plan.</p>	<p>C</p>	<p>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. 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>

		Confirmed through document review of recorded deeds, including for example Deed # 907 p. 86, 94 and Deed #175 p. 172.
2.1.b The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.	C	DOF has detailed maps of mineral ownership and lease agreements. Division of Engineering also has a set of land records used by the DOF. As policy, in-house realtors complete a thorough title search to identify any outstanding rights. Those rights are identified and extinguished prior to any transaction.
2.1.c Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.	C	DOF has a boundary marking policy where by forest managers are responsible for yearly updates to the boundary. Timber harvest prep chapter of LMM details boundary marking of timber sale activities. Third-party ownerships of mineral rights relating to natural gas storage are identified and mapped, confirmed with GIS queries. The Department’s title search and extinguishment process ensures that anything not known is dealt with prior to any transactions.
2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies. <i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i>	C	
2.2.a The forest owner or manager allows the exercise of tenure and use rights allowable by law or regulation.	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 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.
2.2.b In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.	C	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.
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.	C	
2.3.a If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.	C	<p>The Department’s title review process ensures that outstanding rights are extinguished prior to transactions. There are no outstanding tenure or use rights claims. DOF also has a dispute resolution process that can be used to begin the process of address tenure or use rights claims. Beyond that Ohio has an administrative process and court system. Dispute Resolution process has been moved to a higher location on the division website and managers are encouraged to offer the process to stakeholders as needed.</p> <p>Boundaries on the FMU are on a 4-5 year check-cycle during which all state forest boundaries are walked and remarked. This helps to prevent disputes.</p> <p>DOF is committed to open relationships with stakeholders. DOF has a dispute resolution process that can be used to help guide a dispute to resolution, which is available on DOF’s web site. DOF employees are trained in dispute resolution. DOF can cite specific disputes where negotiations were held in good faith.</p>
2.3.b The forest owner or manager	C	There were no significant disputes over tenure. However, any that did occur would be documented

documents any significant disputes over tenure and use rights.		<p>extensively as part of the court process.</p> <p>Occasional disputes arise regarding proper recreational capacity on state forests and also programmatic or philosophical disputes regarding the management of state forests. DOF can provide evidence of specific examples and resolutions offered. Further, DOF maintains a catalog of disputes and resolutions.</p>
Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
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.	NA	FME does not own or management any tribal lands or territories.
3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	C	
3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	<p>There are no tribes that have current legal rights or other binding agreements on the FMU. Ohio has no state or federally recognized tribes, as confirmed with a review of the October 9, 2015 Memo to Robert Boyles, Deputy Director and Chief Forester regarding recognition of Native American Tribes indicated that there are no federally or state-recognized tribes in Ohio; see also the US Department of Interior: Bureau of Indian Affairs list of the 566 federally recognized tribes at:</p> <p>http://www.bia.gov/WhoWeAre/BIA/OIS/TribalGovernmentServices/TribalDirectory/.</p> <p>A visual history of Native American land cessions and treaties/ agreements can be found here:</p> <p>http://usfs.maps.arcgis.com/apps/webappviewer/index.html?id=fe311f69cb1d43558227d73bc34f3a32.</p>
3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	DOF provides training to state forestry staff on the identification and protection of cultural resources. Staff attended a training session administered by the Hopewell National Historic Park archeologists on the history, identification and protection of Indian mounds during 2010, ppt presentation viewed by auditors. Auditors viewed a protected Indian mound

		<p>on the SF lands, as well as general locations from the OHPO database, so areas can be avoided during management.</p> <p>DOF has engaged with the Newark Earthworks Center for future training sessions and their cooperation on the topic of identifying tribal contacts and the organizing of an advisory committee.</p>
<p>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.</p>	C	
<p>3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.</p>	C	<p>As confirmed through interviews and document review, this FME contacted 10 tribal representatives. The letters of invitation include each requirement of this indicator.</p>
<p>3.3.b In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).</p>	C	<p>Tribal representatives have not responded to invitations to consult with OH DOF.</p> <p>As confirmed through interviews and document review, DOF's consultation process includes OHPO. In Ohio, the vast majority of indigenous sites are Indian mounds built during pre-historic times. These locations are mostly known from the OHPO database. DOF reviews this data during pre-activity assessments. These sites are protected from soil disturbance.</p> <p>DOF also has a consultation mechanism with Ohio Historical Preservation Office for the identification and protection of cultural sites and consults with Hopewell National Historic Park and staff regarding cultural sites.</p>
<p>3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or</p>	NA	<p>According to interviews with FME staff, no protected traditional knowledge is used in forest management. Any use of NTFPs is not commercial and employs management practices that are either in the public domain (e.g., maple sugaring) or do not constitute</p>

<p>management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</p>		<p>protected traditional knowledge (e.g., deer population management). SCS confirmed through observation of management practices that FME does not employ any protected traditional knowledge.</p>
<p>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</p>		
<p>4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</p>	<p>C</p>	
<p>4.1.a Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry.</p>	<p>C</p>	<p>Confirmed through interviews and web-based search that DOF is guided by state policies associated with compensation and hiring. Non-exempt state employees are hired and promoted on a public, competitive and union-contract agreed upon method.</p>
<p>4.1.b Forest work is offered in ways that create high quality job opportunities for employees.</p>	<p>C</p>	<p>Confirmed through interviews that employment with DOF is governed by state HR policies and work assignments are of a professional nature. Services are procured through a state mandated competitive bid process.</p>
<p>4.1.c Forest workers are provided with fair wages.</p>	<p>C</p>	<p>Confirmed through interview that this State’s HR policies are used to determine wages or salaries for state employees. Contractors must be paid at least the federal or state minimum wage, whichever is greater. In practice, most workers receive higher than the minimum wage due to skill levels required.</p>
<p>4.1.d Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.</p>	<p>C</p>	<p>Confirmed through interviews, review of the DOF HR handbook, and a web-based search that the State of Ohio and DOF have non-discrimination policies that govern DOF hiring practices.</p>
<p>4.1.e The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.</p>	<p>C</p>	<p>The State agency has implemented procurement incentive programs. Programs such as Minority Business Enterprise promote small business and minority business opportunities. Each of these programs are designed for local and minority opportunities with the state of Ohio. DOF timber sales are advertised to over 100 local businesses. Confirmed through document review and interviews that purchasers of timber are local sawmills. Logging contractors are local.</p>
<p>4.1.f Commensurate with the size and</p>	<p>C</p>	<p>DOF has a landowner assistance program, an urban</p>

<p>scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>		<p>forestry program and an information and education program. Interpretive sites are located on state forests including driving tours and various signs and are available for review, confirmed with multiple field visits; educational roadside kiosks display a large amount of forest management information. DOF has a public website that displays materials ranging from state forest management to outreach. DOF is a supporter of Project Learning Tree with one part-time position on staff. DOF also supports logger training by providing BMP training sites and DOF staff instructors.</p> <p>Each DOF forest map has a description of vegetation on the forest that specifically notes forest species, composition, and silvicultural treatments.</p>
<p>4.1.g The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.</p>	<p>C</p>	<p>Confirmed through interviews, observations and document review including for example DOF’s cooperation with Ohio State University (OSU) through which information such as the Ohio Timber Price Report, directories of various wood industries, and the Timber Products Output Report are generated. A war memorial shrine exists was observed Mohican SF that commemorates veterans and DOF has a cooperative agreement to maintain this special site.</p>
<p>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>		
<p>4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p>	<p>C</p>	<p>Health and safety are mandated by the Ohio Revised Code (ORC), Ohio DNR, and DOF. Department level trainings for supervisors are provided including for example topics such as workplace violence, harassment and defensive driving. Confirmed through observation that forestry staff have access to and use PPE.</p>
<p>4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</p>	<p>C</p>	<p>Confirmed through interviews and document review that DOF maintains a culture of safety including for example monthly safety meetings, a safety committee, an agency hazard reduction program and a safety officer dedicated to each unit. DOF contract language includes a requirement for PPE use by contractors. DOF is governed by OSHA requirements and is responsive to annual OSHA inspections at state forest facilities. The harvest contract template used for each timber sale includes safety provisions found</p>

		principally under items 7 and 9. Confirmed through observations that forestry staff and contractors have access to and use PPE.
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	DOF requires OFA master logging certification for contractors as a pre-requisite to harvesting timber. The master logger program has a safety component. This requirement is clearly stated in contracts. The audit team confirmed through observation that contractors have access to and use PPE and confirmed master logger certifications on the OH Master Logger database.
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).	C	
4.3.a Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.	C	Confirmed through interviews and web-based search that Federal and State laws govern worker rights. As a state agency, DOF has a public employees' union and law enforcement union. Most non-exempt state employees are unionized.
4.3.b The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.	C	Confirmed through interviews that Ohio DNR and DOF have an employee grievance process. This process ensures that employees have a voice to air their concerns and disagreements. Grievances are reviewed and hearings may be held. Resolutions may be appealed. During the 2015 audit, the team observed a posting that includes information about the process to anonymously report grievances and potential ethics violations.
4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.	C	
4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into	C	Confirmed through document review that the FME's understanding of social Impact is summarized in the management plans and in Chapter 12 of LMM. DOF is the author and major partner in the strategies outlined in the Forest Action Plan. The DOF website

<p>management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> • Archeological sites and sites of cultural, historical and community significance (on and off the FMU; • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p>		<p>also includes a discussion of the participation and consultation process.</p> <ul style="list-style-type: none"> • Confirmed through interviews, GIS demonstration and document review including observations of protected sites by the audit team during this 2015 audit. • Confirmed through review of the “Pathways to Participation” process. The Forest Advisory Council provides feedback and consultation to DOF on a wide range of issues including those listed in this indicator. • Confirmed through plan review, interviews and observations that DOF forestry staff have been trained and understand the importance of aesthetics. • Confirmed through interviews and document review that State forests provide local recreation and tourism opportunities and the Ohio State University Extension Program prepared a pamphlet on the economic impacts of Ohio’s forest products industry (Ohio’s Forest Economy, 2010). This FME provides a wide variety of non-timber forest products and services in conformance with this indicator. • Confirmed through document review that purchasers of state forest timber are primarily Ohio-based companies and many are local to the harvest area. Timber sales are competitively bid ensuring that a wide range of local companies have an opportunity to purchase products; the timber bid list includes > 100 companies. Merchandized log sales are competitively bid and advertised to > 60 companies. Merchandised logs are sorted and companies have the opportunity to select the products. • Confirmed through interviews that DOF is active in the Ohio Forestry Association which may represent another opportunity for understanding social impacts. The Forest Advisory Council members come from a wide range of backgrounds.
<p>4.4.b The forest owner or manager seeks and considers input in</p>	<p>OBS</p>	<p>DOF offers several mechanisms including the Open Houses, ‘Pathways to Participation’, stakeholder</p>

<p>management planning from people who would likely be affected by management activities.</p>		<p>meetings, website, and Forest Advisory Council through which input and consultation is received regarding strategic and forest plans and site-specific activities. Other examples of DOF seeking and considering input include the Shawnee prescribed burn plan, the Shawnee Wilderness Plan and the HCVF assessment. Current revisions to Wilderness plan with comment period and public input. However, as confirmed through interviews with DOF staff, DOW staff and stakeholders, staff changes within DOF, DOW and stakeholder organizations have led to varying degrees of communication with some stakeholders. While events such as open houses occur on a regular basis, stakeholders express dissatisfaction with the overall process. See 2015.1</p>
<p>4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	<p>C</p>	<p>Confirmed through document review including open house notices, review of DOF website, prescribed fire notices, timber notices, wilderness plan notices and extension of time for comments.</p> <p>DOF’s policy for timber sales is to notify neighbors prior to harvesting, usually during the layout phase in order to give ample time for their concerns to be voiced. In this example, the local forester contacts the neighbor (knock on the door and conversation, or more formal letter).</p> <p>A public notice for timber sales is listed in the local newspaper and on the DOF website. Each timber sale includes roadside signage.</p> <p>DOF regularly issues statewide news release for large scale projects, planning efforts and new initiatives. For example, for larger prescribed fires, DOF has sent post cards to neighbors and advertised on local radio stations. DOF also provides a Notice of Intent and Timber Harvest Plan to the local SWCD (NOI-THP). Planned TS, harvest location updates, such as trail closures were confirmed to be posted on the DOF website.</p> <p>DOF schedules annual open house opportunities. Forest managers are encouraged to maintain local contacts with township trustees and county officials.</p>

		Finally, DOF actively engages other DNR divisions in order to get perspective on their input and their constituent sensitivities.
<p>4.4.d For <i>public forests</i>, consultation shall include the following components:</p> <ol style="list-style-type: none"> 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>	C	<p>1. Confirmed through interview and document review including for example “Pathways to Participation” available on the agency website. The Dispute Resolution Process is noted on the Pathways to Participation webpage at: http://forestry.ohiodnr.gov/pathwaystoparticipation</p> <p>Additionally, DOF staff have copies of the “Resolution Request Form” to provide to parties upon request. The Forest Advisory Council is also responsive to this indicator.</p> <p>This FME also schedules open houses to provide details and outcomes of the planning process. DOF’s strategic plan, forest-specific 5-year management plan, and annual work plans are posted on the agency website and available during scheduled open houses.</p> <p>2. Confirmed through document review including open house notices, prescribed fire notices, timber notices, wilderness plan notices and extension of time for comments.</p> <p>3. Confirmed through document review of the Dispute Resolution Process. The Management Review Committee evaluates comments.</p> <p>The strategic plan, forest-specific 5-year management plan and annual work plans are posted on the agency website and available during open houses.</p>
<p>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	C	
<p>4.5.a The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	C	Confirmed through interviews and document review that negligent activities have not occurred. A web-based search did not reveal evidence of complaints or investigations into negligent activities.
<p>4.5.b The forest owner or manager provides a known and accessible</p>	C	This FME maintains open communication with a variety of stakeholders in their field and administrative offices. The complaint file was

<p>means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>		<p>reviewed and significant disputes/legal suites or claims were not received in the last twelve months. The DOF Grievance Form is found on the DOF website and is also available by contacting any member of the DOF staff. Confirmed through document review.</p>
<p>4.5.c Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.</p>	<p>C</p>	<p>Confirmed through interviews and document review that management activities have not caused damage or loss of income that required compensation or mitigation for damage or loss of income to another party. A web-based search did not reveal examples of substantiated damage or loss of income.</p>
<p>Principle #5: Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p>		
<p>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.</p>	<p>C</p>	
<p>5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.</p>	<p>C</p>	<p>Interviews, document review and observations of this FME’s infrastructure, technology, staffing levels and equipment confirm that this agency continues to be capable of implementing these core management activities. Interviews with recently hired forestry staff confirm that funds have become available for this purpose. Another additional metric of this FME’s financial health can be quantified in the observed and recorded merchantable forest growing stock.</p>

		<p>Confirmed through interviews and document review that DOF is governed by language in state code that gives the Chief custody and management of forests and the necessary resources to fulfil the obligation. While all state agencies including this FME have experienced difficult economic years, there is commitment at the department level to ensure that the DOF is viable. In recent years, DOF applied for and received grant funding for forest management operations. DOF conducts regular budgetary analysis as part of the annual planning and annual report processes, which ensures overall conformance to this indicator. Budgets and annual reports include progress on each of the public mandates and projects under DOF's responsibility.</p>
<p>5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.</p>	C	<p>DOF altered business practices to implement a new program that merchandises log sales and has also applied for and received additional federal grants. Interviews confirm that equipment and staffing have remained consistent for completing prescribed burns.</p>
<p>5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</p>	C	
<p>5.2.a Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.</p>	C	<p>Purchasers of state forest timber are primarily Ohio-based companies and many are local to the harvest area. Timber sales are competitively bid ensuring that a wide range of local companies have an opportunity to purchase products; the timber bid list includes > 100 companies. Merchandized log sales are competitively bid and advertised to > 60 companies. Merchandized logs are sorted and companies have the opportunity to select the products.</p>
<p>5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.</p>	C	<p>DOF contract language and guidelines in the LMM Chapter 8 includes a section that describes the utilization requirements. DOF's Marketing and Utilization program also designed projects to promote better utilization. DOF is active in promoting utilization of salvage Ash timber from EAB mortality. DOF implemented a firewood program and sells permits to citizen's to remove firewood in an effort to</p>

		<p>promote utilization. DOF maintains and uses a small sawmill that generates products for use by other public agencies and sells some products locally. Finally, an agreement with Gladfelter allows DOF to conduct thinning and improvement operations within stands that are not yet financially operable. For example, A-2, Sale 1412 (C-4), & F-26 Fiber Supply thinnings allowed lower-grade material to be sold providing conditions for the residual stand to develop to merchantable size at an earlier date.</p>
<p>5.2.c On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.</p>	C	<p>Confirmed through interviews and contract review that most stumpage and merchandising sales include relatively small up-front costs that are structured to allow for a small business to participate in the process.</p>
<p>5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>	C	
<p>5.3.a Management practices are employed to minimize the loss and/or waste of harvested forest products.</p>	C	<p>Confirmed through document review that DOF has developed utilization standards that are outlined in LMM chapters 4, 7, and 8 and within each timber sale agreement. DOF designed and implemented a logging inspection process and compliance with the contract is noted on the inspections and enforced by the Timber Sale Administrator (TSA). DOF's history of response to catastrophic events including for example ice storms and wildfires is complete. DOF's firewood program is also used to minimize loss or waste of harvested forest products.</p>
<p>5.3.b Harvest practices are managed to protect residual trees and other forest resources, including:</p> <ul style="list-style-type: none"> • soil compaction, rutting and erosion are minimized; • residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; • damage to NTFPs is minimized during management activities; and 	C	<p>Confirmed through document review that on soil protection, residual trees, non-timber resources, and water are outlined in LMM chapters 4, 5, 6 and 8. DOF has aesthetic guidelines outlined in chapter 6 of the LMM. DOF has a marking estimate process that is used as a harvest specification document that is written by the forester and approved up the chain of command outlined in chapter 4 of the LMM. DOF further specs harvests to the purchaser in the bid prospectus and the contract. DOF has language dealing with residual tree damage in the contract. DOF has a Wet Weather Logging policy included in chapter 8 of LMM and the contract. DOF does a NOI-</p>

<ul style="list-style-type: none"> techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible. 		<p>THP for the SWCD.</p>
<p>5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	<p>C</p>	
<p>5.4.a The forest owner or manager demonstrates knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.</p>	<p>OBS</p>	<p>DOF offers timber sales in a wide range of locations throughout the state including merchandised log sales. DOF’s merchandising program directly benefits at least two local service contractors through a competitively bid process. DOF benefits local economy thru the revenue return to local governments. State forests also provide local recreation and tourism opportunities and the Ohio State University Extension Program prepared a pamphlet on the economic impacts of Ohio’s forest products industry (Ohio’s Forest Economy, 2010).</p> <p>This FME provides a wide variety of non-timber forest products and services in conformance with this indicator. However, stakeholders’ comments mention that the FME’s emphasis on timber harvesting is perceived to be in contrast to the value of the other non-timber products and local economic uses of the forest (including for example ecotourism, hiking, wildlife protection, fishing and hunting) at Shawnee SF. There is an opportunity to improve staff understanding/consideration of recreational interests and use of the Shawnee SF.</p> <p>See 2015.2</p>
<p>5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.</p>	<p>OBS</p>	<p>This FME provides a wide variety of non-timber forest products and services in conformance with this indicator. However, stakeholders’ comments mention that the FME’s emphasis on timber harvesting is perceived to be in contrast to the value of the other non-timber products and local economic uses of the forest (including for example ecotourism, hiking, wildlife protection, fishing and hunting) at Shawnee SF. There is an opportunity to improve staff understanding and consideration of recreational interests and use of the Shawnee SF.</p> <p>See 2015.2</p>

<p>5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	<p>C</p>	
<p>5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.</p>	<p>C</p>	<p>DOF incorporated the results from the SCORP and the Forest Action Plan into management activities; each of these documents address forest services. DOF actively consults with core recreation groups such as Ohio Horseman’s Council, Buckeye Trail Association, and motorized groups on recreation interests that it need to consider. DOF protection zones buffer riparian areas, floodplain forests, HCVF and aesthetic areas. DOF harvest levels are modest. As confirmed through interviews, observations and document review, DOF has developed carbon-storage lease agreements for tree plantings on formally agricultural or non-productive sites. DOF worked with the Division of Soil and Water and DNAP to identify quality waters and habitats on state forests. Finally, DOF includes a discussion of forest services that are considered in the forest-specific 5-year management plans.</p>
<p>5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.</p>	<p>C</p>	<p>Confirmed through document review, interviews and observations that DOF maintains carbon-storage leases and has documented that harvest-levels are modest thereby ensuring carbon stores are reliable. DOF summarizes a variety of forest services within the 5-year management plans. Finally, DOF worked with the Division of Soil and Water and DNAP to identify quality waters and habitats on state forests and has zoned these areas appropriately.</p>
<p>5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	<p>C</p>	
<p>5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the</p>	<p>C</p>	<p>As confirmed through document review, the actual volume harvested during this past audit year was 12.1 million board feet, or roughly 28% of growth. DOF harvests may reach 40% of growth but more commonly average 17-25% of growth in individual State Forests located across the State.</p> <ul style="list-style-type: none"> • Inventory summaries are based on an initial inventory completed in 2008 with periodic updates based on current cruise data. DOFs harvest efforts match their Desired Future Condition which

<p>Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>		<p>describes increasing the presence of oak throughout the forest. This strategy has been designed to combat the increase in shade tolerant maples that has occurred over the past century. The current silvicultural practices favor more shade intolerant oaks.</p> <ul style="list-style-type: none"> • Additionally, a 2009 inventory project was completed on 8 state forests and including 80% of the FMU. The data was grown using FVS. The other 13 state forests' inventory (20% of FMU) estimated growth and yield using FIA averages for each county. Historical harvesting data is available for past decades. A rolling 10-year average harvest level shows harvest levels are 22% of calculated growth. As confirmed through document review, a description of growth and yield and harvest levels is included in the 5-year forest-specific management plan and the LMM Chapter 3. Growth and yield calculations are based on strata and stand type and mean annual increment over a 10-year period. DOF uses the OAK SILVAH to process data and determine AAH. • As confirmed through interviews, documented mortality (storms, fire and other natural causes) are incorporated into the sustained yield harvest calculation. • Areas reserved from harvest confirmed through document review and interviews that calculations from successive runs include harvest and silvicultural impacts. • As confirmed through document review and interviews, a description of the Desired Future Condition has been included in the 5-year plans and calculations are based on this condition (to the presence of oak throughout the forest and combat the increase in shade tolerant maples).
<p>5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p>	<p>C</p>	<p>The rolling 5-year average remains less than 30% of growth and thus extremely modest when compared to sustained yield. The growth rate is just over 41 MMBF; the AAH is 16 MMBF and is summarized in DOF's "Harvest Levels by Year" spreadsheet. Currently, the 5-year average harvest is 11,305,994 BF and the 10-year average is 9,972,736 BF.</p>
<p>5.6.c Rates and methods of timber</p>	<p>C</p>	<p>DOF outlines this in the DFC doc and in Chapter 3 of</p>

<p>harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>		<p>the LMM. Reacting to data presented in FIA that show oak decline and the “mesification” of Ohio forests, DOF is focused on oak management and a full discussion of this focus is summarized in management documents. DOF has implemented its committed to train forestry staff in association with this new focus including the shift toward prescriptions that promote oak.</p>
<p>5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p>	<p>C</p>	<p>DOF does not manage or allow of the commercial collection of NTFPs. For example, the collection of American ginseng (<i>Panax quinquefolius</i>) is regulated by law and collection is prohibited on DOF land. However, forest visitors are allowed to collect mushrooms and berries on a recreational basis.</p>
<p>Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</p>		
<p>6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources - - and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities.</p>	<p>C</p>	

<p>Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</p>		
<p>6.1.a Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:</p> <p>1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>;</p> <p>2) <i>Rare, Threatened and Endangered (RTE) species</i> and <i>rare ecological communities</i> (including plant communities);</p> <p>3) Other habitats and species of management concern;</p> <p>4) Water resources and associated riparian habitats and hydrologic functions;</p> <p>5) <i>Soil resources</i>; and</p> <p>6) <i>Historic conditions</i> on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.</p>	<p>C</p>	<p>Detailed in LMM Chapters 4, 5, & 6 and annual work plans.</p> <ul style="list-style-type: none"> • Forest community types are listed in state forest management plans • Prior to site disturbing activities, field personnel query state databases for the presence of RTE species, using information provided by DOW and ONAP using the Ohio Biodiversity database (that includes information from DOW Wildlife Action Plans for RTE species and Ohio’s list of Endangered and Threatened Plants) and the Historical Society Database • Follow-up surveys with botanist and biologist if something found or predicted on a database • Compartment exams constitute an assessment of site-specific forest conditions • DOF inventory data • FIA data • Landscape analyses conducted on the two largest state forests constitute a higher level of environmental analysis • An FMU wide assessment of forest conditions was conducted as part of the RSA assessment • 80% of state forest acreage was inventoried in 2009 • ODNR Hydrologic and Cover Type Datasets • Consultation with Web Soil Survey Submission of NOI-THP with local SWCD. • DOF also maintains a GIS layer of special sites that was put together internally based on a self-assessment • The RSA and HCVF assessments (detailed in other indicators) • LANDFIRE analysis, and the compendium of research and symposiums dealing with oak and fire ecology
<p>6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term</p>	<p>OBS</p>	<p>As confirmed through interviews and document review, FME uses many different datasets during the process of identifying sites that may include RTE species, which requires coordination and review of</p>

<p>impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the best available information, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>		<p>information from a variety of sources.</p> <p>OH DNR DOW reviews potential harvest plans and develops mitigation measures for RTE species and their habitats. DOW needs to receive draft harvest plans from DOF in a timely manner, well before the annual stakeholder open house is scheduled in order to adequately review harvest plans and suggest mitigation measures. While DOW staff are knowledgeable of commonly prescribed mitigation measures, stakeholders had questions on specific sites that staff were unable to address satisfactorily in some cases. To ensure that staff are fully knowledgeable of specific site concerns, DOW may require more time to review planned management activities for RTE species attributes according to interviews - anywhere from 3-6 months in advance of the annual open house.</p> <p>In order to expedite the process of assessing and documenting the potential short and long-term impacts of planned management activities on RTE species prior to commencing site-disturbing activities:</p> <ul style="list-style-type: none"> 3) While offering similar or better levels of its current performance, FME should consider working with other agency staff to identify opportunities to make the RTE review process more efficient. 4) FME should consider sending draft harvest plans to DOW for review well in advance of the annual stakeholder open house.
<p>6.1.c Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>	<p>C</p>	<p>All activities have a plan on each individual unit that details the activities, impacts, and mitigation. Timber sales have a “Marking Estimate”, prescribed fires have a “Burn Plan” and precommercial activities have a “Precommercial Project Prescription”.</p> <p>Chapter 11 of the LLM describes Prescribed Burn Plans which are responsive to this Indicator, GIS datasets such as special sites, RTE & historical sites were also queried.</p> <p>Field observations by the audit team confirm:</p>

		<ul style="list-style-type: none"> • limited rutting, within appropriate limits • no evidence to suggest that the long-term ecological viability is being compromised due to management activities
<p>6.1.d On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	C	<p>All DOF records are public record and are displayed at Open Houses and public meetings in draft form for comment and input prior to finalizing. Management Review Committee (Integration Committee) evaluates and considers public comments in regular meetings.</p>
<p>6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>	C	
<p>6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the</p>	OBS	<p>RTE species are regularly taken into account during the development of management plans, safeguards are outlined in the LMM and in its management plans. DOF has a zoning system as well as policies to review heritage data prior to site disturbing activities. DOF complies with the Division of Wildlife (DOW) Wildlife Action plans for all forest dwelling RTE species. DOF is on the Karner Blue Butterfly recovery team. DOF complies with the Indiana Bat Management Strategy, which recommends protection of hibernacula, and management practices for creating or maintaining roost trees and snags. DOF policy states that it follows up with any positive “hit” on any database. DOF relies on expertise from its sister agency within ODNR, with DOW biologists reviewing management/harvest plans, as well as GIS data. DOW reviews the annual work plans for the state forests, and then comments on individual harvest plans as necessary.</p>

<p>appropriate database.</p>		<p>DOW biologists may request a site visit at their discretion, and provide feedback and comment as necessary on harvesting practices in order to protect rare, threatened and endangered species.</p> <p>DOF has in-house botanist who reviews certain sites based on heritage data and provides a thorough field survey for rare plants. DOF botanist is reviewing any positive hits from the database and forwarding findings to the database program administrator. DOW is the new keeper of the database renamed the Ohio Biodiversity Database.</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 Openings region in Northwest Ohio.</p> <p>As confirmed through interviews with outside experts and document review, gaps exist in the knowledge of Timber Rattlesnake (RTE) presence/absence, movements and habitat requirements in Ohio. To protect RTE species (Timber Rattlesnake), FME could consider using a precautionary approach during all forest management activities within southern Ohio including, but not limited to, road maintenance, prescribed fire and timber harvesting. In the absence of other information, there is an opportunity to consider, for example, regional expert information during the planning process, enhanced logger training with respect to rattlesnake protection during timber harvests and other methods used elsewhere in this region and suggested by experts during consultation.</p> <p>See 2015.4</p>
<p>6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the</p>	<p>C</p>	<p>DOF’s approach is outline in the LMM and documented in its marking estimates, burn plans, etc. There is a mitigation section where DOF documents what was found and its adjustments to the activity. Training on RTE species has been included in its</p>

<p>extent, quality and viability of the species and their habitats.</p> <p>Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>		<p>regular trainings. DOF has a zone system that includes HCVF (HCVF includes areas of RTE species concentrations) and RSAs.</p> <p>For the green adder’s mouth (<i>Malaxis unifolia</i>), DOF was notified of a patch on Tar Hollow State Forest that might have been impacted by a timber sale. Trees were removed from the sale that surrounded the plants and equipment was excluded from the area. This plant was discovered post-site plan preparation since the heritage database was updated after the initial planning. DOF sent in two different teams to examine the area and found more sites where the plant occurred than when the database was updated.</p> <p>For timber rattlesnakes, prescribed burns that could directly affect them are avoided through conducting prescribed burn while snakes are hibernating (burn season is late fall to early spring, no later than first week of April). DOF does not usually have access to den sites due to issues of confidentiality.</p> <p>For bats, DOF retains loose-bark hickory species on all timber harvests per recommendation of DOW. Other tree species are also retained. As all species of bats are possibly impacted by White-nose Syndrome, DOF is working on refining its bat-strategy.</p>
<p>6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species’ recovery goals, as well as landscape level biodiversity conservation goals.</p>	<p>C</p>	<p>DOF participates and complies with DOW Wildlife Action Plans (recovery goals) for forest dwelling RTE species. They are referenced in the 5-year management plans. DOF is an active contributor to the Indiana Bat Management Strategy and the Karner Blue Butterfly Recovery Team. DOF adopted the biodiversity goals outlined in the Forest Action Plan and placed them in each forests management plans. DOW and DOF have been cooperating on implementing forest management that it intended to create openings for oak regeneration and structure for several wildlife species that may have been more prevalent during pre-European settlement conditions. DOF’s fire staff consult with DOW staff to protect potential den sites for Timber Rattlesnakes during prescribed burns, as confirmed through interviews with DOF and DOW. The early successional habitat creates foraging habitat for small mammals, which are a food source for snakes. Burns also may promote snags and woody debris, which snakes use for shelter</p>

		and hiding. DOF has never burned a den to best of its knowledge since burns occur in the late fall or early spring prior to snakes coming out of hibernation.
6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	DOF has a Law Enforcement patrols on the FMU and enforces laws including poaching. All state forests are open for public hunting. DOW enforces RTE species laws on state forests.
6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	
6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	DOF, in cooperation with other state agencies and stakeholder, has determined that most of the FMU is in older age classes. Thus, it primarily focuses on oak-hickory management. In general, DOF's approach to dealing with under-represented successional stages is outlined in the DFC document.
6.3.a.2 When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <i>conservation zones</i> and/or <i>protected areas</i> are established where warranted.	C	This analysis is inclusive of DOF's zone system and delineations of areas to be set aside in more restrictive zones. DOF's site level assessments are designed to capture anything not considered during zoning, such as vernal pools and other smaller areas not captured during zoning analysis. DOF manages Maumee State Forest that lies within the Oak Openings region and DOF have recognized restoration of oak species density and age class diversity at Maumee is necessary.
6.3.a.3 When they are present,	C	Ohio state forests exist in the context of heavy-

<p>management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct</p>	<p>handed anthropogenic influences including widespread iron-ore furnaces in the mid- to late-1800s. These furnaces required vast quantities of wood material to fire the furnaces. Subsequent land use was mostly in the form of low-intensity farming and woodlot grazing. These influences leave us with a forest that is relatively even-aged and less than 120 years old. DOF believes that, based on inventory data, it does not have any type 1 or type 2 old growth. 40 years of compartment reviews have helped discern the lack of old growth.</p> <p>DOF has management zones that will promote future later successional stands. In those zones, no activities, except invasive species control, is allowed. DOF has policies to deal with Legacy Trees and Retention Trees that will promote future later successional areas. Mohican State Forests, as well as the Shawnee Wilderness and other RSAs, have later successional forest as their desired future condition.</p>
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<p>controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 		
<p>6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>C</p>	<p>In large part, DOF’s oak management focus has implications for a host of wildlife species that would predictably suffer if the forests were allowed to transition to mesic species over much of the landscape. DOW, USFS research, and other partners and publications support DOF in this effort.</p> <p>Several examples support DOF’s wildlife enhancement efforts, including for non-game species. DOF has 2 Ruffed Grouse management areas and 1 Wild Turkey management area. Shawnee and Zaleski are identified by DOW as “forest focus areas” for most, if not all, important wildlife species and have associated tactical plans. DOF has invasive species programs. Rattlesnake habitat is a central focus at Shawnee SF. Past tree planting efforts on reclaimed</p>

		<p>mine areas at Fernwood, Harrison, and Perry State Forests. There have been historic tree planting for soil conservation at Mohican, Hocking, etc. DOF has the Indiana Bat Management Strategy that has a habitat component, such as retention of loose-bark hickory species within harvest units. DOF cooperates with TNC to provide a corridor between the Edge of Appalachia Preserve and Shawnee State Forest. DOF manages the Forest Legacy Program to promote conservation easements.</p>
<p>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of <i>Riparian Management Zones (RMZs)</i> to provide:</p> <ul style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent <i>aquatic habitats</i>; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 	<p>C</p>	<p>DOF zone system outlined in LMM chapter 2 contains a “Resource Protection” zone that includes all of the major floodplain forests that it manages. Management guidelines prevent clearcutting and heavy equipment use in the zone. DOF has an SMZ policy. DOF identified OEPA designated high quality streams located on state forests. DOF solicited input from the fisheries section of DOW for identification of important stream habitats and zoned them as appropriate. DOF foresters have been trained on SMZs.</p> <p>Protection of SMZs from harvest and equipment entry are the primary methods of meeting elements a)-e) of this indicator. Multiple field observations of stream buffer protections were viewed.</p>
<p>Stand-scale Indicators 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	<p>C</p>	<p>Oak ecology and management is the main focus in hardwood areas. Pine stands mostly consist of old plantations that are managed in the long-term to revert to hardwood. All foresters have received training on SILVAH Oak, an Appalachian-Allegheny Hardwood silvicultural management system developed at the USDA Forest Service.</p>
<p>6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of</p>	<p>C</p>	<p>DOF relies mostly on natural regeneration. No planting sites were viewed in 2015. LMM details the pre-commercial activity in chapter 9. Tree planting is incidental and not normal operation therefore this indicator is directly applicable. When</p>

<p>quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>		<p>tree planting occurs, stock is purchased locally and has a local source. Previous year’s receipts for plantings reviewed and contained local species. Local source seed mixes are used, mix confirmed to have only native species.</p>
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>	<p>C</p>	<p>DOF’s guidelines relating to Legacy Trees and Retention Trees are noted in the LMM chapter 4. Further guidance on retention trees is outlined in DOW documents such as the Indiana Bat Management Strategy and others. DOF and DOW coordinated on revising the retention guidelines in the LMM to reconcile three different documents and to eliminate confusion with staff.</p> <p>Representative retention confirmed with observations during field visits and review of harvest prescriptions.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage</p>	<p>C</p>	<p>DOF believes that even-aged systems are most appropriate to oak regeneration. Evidence is outlined in the timber harvest prep chapter of the LMM. DOF has a retention policy. Silviculture systems conducive to oak management include treatments that meet this indicator such as deferment cuts and shelterwoods.</p> <p>DOF and DOW coordinated on revising the retention guidelines in the LMM to reconcile three different documents and to eliminate confusion with staff.</p> <p>Representative retention was confirmed with observations during field visits and review of harvest prescriptions.</p>

<p>harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, 	<p>C</p>	<p>Outlined in the LMM chapter 4. There are only 3 situations where DOF may depart from retention guidelines:</p> <ol style="list-style-type: none"> 1) The Grouse Management Areas – clearcut treatments are used, generally less than 10 acres, however some are between 10 and 15 acres. These areas are managed per agreements with the Ruffed Grouse Society; 2) Pine clearcut harvests – biologists and foresters agree that pine retention trees are not appropriate given that the intent is to promote hardwood regeneration; and 3) Salvage – responses to catastrophic events such as tornado, ice storm, and wildlife will likely not meet retention goals given that there are few trees left to retain. <p>No openings larger than 10 ac. in size were viewed during the 2015 audit, per observations during field visits.</p>

to confirm the preceding findings.		
<p>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	<p>NC</p>	<p>Interviews, observations and document review confirm that non-native invasive plants are common in this landscape and FME collects information about the presence of non-native plants during inventory and other management activities. Funding has been available and used in the past for population control and a new funds are now available for future control measures. Control of established invasive populations is confirmed with treatment records from past years.</p> <p>However, the locations of non-native invasive plants are stored as comments on paper forms and the FME has not yet developed a method to determine the extent or degree of threat.</p> <p>Furthermore, FME has not implemented a management practice that will minimize the risk of non-native invasive plant establishment, growth and spread.</p> <p>In addition, USFS research conducted on Tar Hollow SF, for example, and other readily accessible research findings have established a relationship between the presence of fire and the spread of Tree-of-heaven (<i>Ailanthus altissima</i>). Paulownia (<i>Paulownia tomentosa</i>) is another species that has been documented to spread following fire.</p> <p>Finally, during the 1412 and AF Merch A-6 field visits, cattails and rushes were observed by the audit team and not identified by field staff prior to harvest per interview with the forester. The cattails (<i>Typha</i> spp.) observed by the audit team were NOT confirmed to be Narrow-leaved and hybrid Cattail (<i>Typha angustifolia</i>, <i>T. x glauca</i>) however <i>T. angustifolia</i> is included in the list of Invasive Plants of Ohio and field staff are not aware of this species.</p>

		See 2015.5
6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	DOF has a fire management program. In 2015, DOF burned 670 acres in the southern district during the spring burn season (March to the end of the first week of April). This year, the burn plan includes 717 acres (2 in the fall and the rest will be in Spring 2016). Copies of each of the burn plans were reviewed.
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.	C	
6.4.a The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) GAP analyses ; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups. For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.	C	Of the 26 total community types, only the Great Lakes Spruce Fir type has not been identified as an RSA; this type is not present on the FMU. ODNR conducted an RSA Assessment and the results are outlined in that document. There are 3 on-FMU RSAs that include two designated Natural Areas and one designated Wilderness. DOF manages the largest GAP status 1 RSA in the state. Assessment was completed in jointly with the TNC, DOW, Div. of Natural Areas & Preserves (DNAP/Natural Heritage), & USFS. A development related to allowed management in the wilderness protected areas occurred in the previous year over whether to end the let in burn policy for natural fires in the Shawnee wilderness area. This has been designated as an RSA, and fire suppression in this context could be interpreted as not in keeping with the objectives of the RSA. However, the standard does not specifically address this issue. Also, stakeholder comments from the public were heavily in favor of this change, including from environmental groups. Thus the new policy is still in conformance with the indicator. List of the RSAs is noted on page 9 of the RSA

		Assessment.
<p>6.4.b Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p> <p>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p>	NC	<p>FME’s RSA analysis did not include an analysis of successional stages (RSA purpose 2) and large FMUs are generally expected to establish RSAs of purpose 2 within the FMU. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest managers whose properties are conducive to the establishment of such areas, shall designate ecologically viable RSAs to serve these purposes. Large FMUs are expected to establish RSAs of purpose 2 within the FMU.</p> <p>See 2015.6</p>
<p>6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p> <p>a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or</p> <p>b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.</p>	C	<p>Management activities within RSAs are limited to low impact activities. Confirmed by interview and document review that only 1 forest type was determined to be not protected on other lands (Great Lakes Spruce Fir) and present on OH DNR's Chapin Forest Reservation and managed as a reservation by Lake County Metroparks.</p>
<p>6.4.d The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs</p>	C	<p>DOF has committed to review its RSA allocations on a 10-year interval. Last completed in 2010, and is planned to occur before the next 5 year planning cycle.</p>

(Indicator 6.4.b) is revised accordingly.		
6.4.e Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	C	Both Shawnee and Zileski—the two state forests that meet the FSC definition of a large, contiguous public forest—have RSA protected areas that have been designated.
6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	C	
6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	The LMM chapter 1 includes written guidelines that are responsive to this Indicator. State BMPs (written and published) are treated as mandatory on the state forests and are noted in written contracts.
6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	NC	<p>Final inspections by foresters who administer the harvests and by their supervisors include a review of BMPs, documented in timber sale records. Monitoring activities are discussed in chapter 12 of the LMM. All foresters receive TSA training as part of their normal training; this covers monitoring protocols. All harvests are planned, laid out, and supervised by trained foresters, who are supervised by forest managers. Forest managers (who supervise foresters conducting the timber management program but who are also responsible for all management activities) ensure BMPs are used as needed.</p> <p>On Richland Furnace State Forest at Audit Site 5 the APV Trail between Points 2 and 3 has Waterbars that are directing road water and sediment towards a pond. The trail had been deeply incised into the hillside, so large Waterbars were constructed to drain the trail. Three of the Waterbars directed water to the side of the road where there is a man-made pond, and some sediment from one of the Waterbars has traveled through the filter strip and entered the pond. The site is shaped such that one or more Waterbars could have been constructed to direct water to the side of the road away from the pond.</p>

		<p>The overall program for implementing BMPs is very strong. The use of professional foresters to plan and oversee harvests, timber sale contracts with provisions to follow BMPs, pre-harvest meetings between foresters and logging contractors, sale supervision with regular written inspections, post-harvest inspections with follow-up actions as needed, and periodic second-party BMP audits comprise the program.</p> <p>For all harvests foresters complete the voluntary “Timber Harvest Notice of Intent” which is a BMP-focused, site-specific harvest plan that is provided to the local Soil and Water Conservation District.</p> <p>See 2015.7</p>
<p>6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. 	<p>C</p>	<p>The elements are addressed in Ohio BMPs. Based on many field observations, the audit team concludes that DOF is in compliance with the actions listed in the Indicator. Additionally, “DOF promotes low-impact equipment by advertising low-impact only timber sales. DOF manages an incentive program (Linked Deposit) whereby loggers can purchase low impact equipment at reduced interest rates.”</p>

<ul style="list-style-type: none"> • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate. 		
<p>6.5.d The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; 	<p>C</p>	<p>The timber sale administrator (TSA) is responsible for skid road layout and as a condition of working on state forests, loggers must stay on designated skid roads, noted in LMM chapter 8. DOF does not have a road building program – it is not needed since as the state forests have a well-maintained and accessible transportation network, including many historic roads. DOF has a cooperative roadway maintenance agreement with ODOT. Recreation trails have maintenance standards and DOF maintains partnerships with groups to conduct trail maintenance to minimize erosion. DOF aesthetic guidelines help to ensure that skid roads and landings are minimized.</p> <p>DOF completes road inspection and trail inspection data sheets. Multiple well-maintained roads, including culvert replacements, were viewed during field visits, as well as well-maintained bridle and ATV trails and closed out skid trails.</p>

<ul style="list-style-type: none"> • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 		
<p>6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written Streamside Management Zone (SMZ) buffer management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>	<p>C</p>	<p>DOF's BMP's manual and SMZ addendum complies with or exceeds FSC Standard's requirements for minimum buffer widths and management practices. See updated SMZs (Streamside Management Zones from Division of Forestry LMM chapter 4). Confirmed with field observations and buffer widths documented in sale folders.</p>
<p>6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative</p>	<p>C</p>	<p>No such variations were observed during the field visits, which suggests that they are limited and infrequent if they occur at all. There is a policy in place that requires guidelines to be followed; this appears to be enforced and implemented. In cases where variations from the stated minimum buffer widths have occurred, DOF states that it has been due to contract non-compliance and those are</p>

<p>configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>		<p>handled via the mechanisms afforded to DOF in the timber sale contract.</p>
<p>6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of aquatic habitat. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	<p>C</p>	<p>Field observations confirm that DOF uses guidelines outlined in the BMP manual for Ohio that respond to this indicator, as well as those outlined in the LMM SMZ Addendum. Field sites viewed well avoided stream crossings with detailed skid trail layouts.</p>
<p>6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	<p>C</p>	<p>Enforcement Division takes the lead to control recreational uses like hunting, fishing, trapping, collecting and other activities. OH DNR administers a host of regulations, licenses, and permits to protect state resources. There are trail construction and maintenance standards and guidelines. The recreation committee sets forth policy and standards relating to trails. DOF has partnerships with OHC, BT, and other groups to deal with trail maintenance. As needed, trails are re-routed in cooperation with external groups and</p>

		<p>communicated in part by postings on the DOF website.</p> <p>RTP grants and commitment for funds for maintenance provide the financial resources to manage adverse impacts of recreational activities on the state forest</p>
<p>6.5.h Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	NA	<p>Confirmed through interviews and observation that grazing by domesticated animals does not occur on Ohio State Forest land.</p>
<p>6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	C	
<p>6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	C	<p>DOF is in compliance; list of chemicals used is in the LMM chapter 9.</p>
<p>6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides,</p>	C	<p>DOF's use of pesticides mostly surrounds invasive species control efforts, such as EAB, ALB, gypsy moth, Ailanthus, Paulownia. All staff and workers receive applicator training. All projects that use chemicals</p>

<p>herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>		<p>have a plan similar to the plans developed for timber sales or prescribed burns. Multiple packets of application documents reviewed and contain: Prescription, Map, Environmental Impact, & Inspection.</p> <p>ARRA grant monies were previously used from 2009-2011 for licensing and treatment. New grant money will also be used in the next few years for additional invasives treatments.</p> <p>Currently OH DNR is only treating HWA on State Park properties - imidacloprid stem injection for larger trees and root dredging for smaller trees, with HWA monitored a few times annually. No treatment on State Forest lands now, but may in the future.</p> <p>At the Vinton State Forest-Vinton Furnace Experimental Forest, USDA FS researcher has a new research project that uses a North American fungus, Verticillium wilt, to control Ailanthus, an alternative to pesticide use. She provided the ODOF and the audit team and the progress report to date.</p>
<p>6.6.c Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals</p>	<p>C</p>	<p>Written plans including prescriptions, methods, and rates are prepared, reviewed, and approved prior to treatments. Application records viewed.</p>

required.		
<p>6.6.d Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area.</p> <p>Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.</p>	C	<p>Written plans including prescriptions, methods, and rates are prepared, reviewed, and approved prior to treatments. Application records viewed. Applicator training records also viewed and licensing expires every 3 yrs. – viewed records retained by OH DNR Invasives Program Administrator.</p>
<p>6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	C	<p>The treatments include both in-progress inspections and final inspections and monitoring. Records of applications and inspections viewed, provided by OH DNR Invasives Program Administrator.</p>
<p>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.</p>	C	
<p>6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills</p>	C	<p>Contractors are trained in spill prevention and clean up. Spill kits are required to be on-site during timber harvesting. Field audits did not identify any improper disposal of fuel or oil.</p>
<p>6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.</p>	C	<p>Contractors are trained in spill prevention and clean up. Spill kits are required to be on-site during timber harvesting. Field audits did not identify any improper disposal of fuel or oil and spill kits were visually confirmed during on-site logger interviews.</p>

<p>6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.</p>	<p>NC</p>	<p>Hazardous materials and fuels were visually confirmed to be stored in the field in logger trucks/trailers.</p> <p>One unlabeled container with a broken cap and containing an unknown liquid chemical was observed in the garage storage area of Shawnee SF. See 2015.8</p>
<p>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.</p>	<p>C</p>	
<p>6.8.a Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i>, insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.</p>	<p>C</p>	<p>No biological control agents are being used on State Forests by staff.</p> <p>IPM is employed on the State Forests.</p> <p>The use of biological controls has either been in conjunction with research projects or as part of larger efforts to control Gypsy Moth, EAB, or Hemlock Woolly Adelgid. All applications were done using IPM techniques with written protocols and records. The intent of these efforts are to evaluate efficacy and appropriateness for other Ohio woodland owners. Records viewed and retained by Tom Macy, OH DNR Invasives Program Administrator.</p> <p>Use of predatory beetles to control HWA in a pilot project. Currently not used on State Forests but may be on State Forests in future treatments.</p>
<p>6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.</p>	<p>C</p>	<p>Training records such as these are retained by Tom Macy, OH DNR Invasives Program Administrator.</p>
<p>6.8.c If biological control agents are used, their use shall be documented, monitored and strictly controlled in</p>	<p>C</p>	<p>No biological control agents are being used on State Forests by staff.</p>

accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.		See 6.8.a.
6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose	C	No GMO's are in use on the State Forests.
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	There have been historic plantations of a host of tree species and they are still visible today, mostly white pine. Current policy is not to plant exotic species and to manage these historical planting to restore native hardwood composition. DOF uses grass seed mixes recommended (annual rye, clover, etc.) in the State BMP manual. DOF has received some grants to use native seed mixes.
6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	DOF does not actively use exotic species. Most exotic plantings were done in the 1930s and 1940s when the Civilian Conservation Corp was active. These legacy plantations of pine species are not native to the site, but they are being phased out through even aged harvests. Former plantations are being regenerated to native hardwood forest.
6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	White pine and other conifers have not regenerated off-site and regeneration has been very low. Native hardwood regeneration usually outcompetes the planted exotic pines.
6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the	NA	

<p>forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p>		
<p>6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>NA</p>	<p>No conversion. Confirmed with interviews, selected compartment level inventory review, and provided acreages compiled from GIS mapped boundaries.</p>
<p>6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>NA</p>	<p>No conversion.</p>
<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>NA</p>	<p>No conversion.</p>
<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	<p>NA</p>	<p>No conversion.</p>
<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements</p>	<p>NA</p>	<p>No conversion.</p>

of Criterion 6.3 (see also Criterion 7.1.l)		
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	C	<p>Currently, no areas are being converted to non-forest use. If this is planned to occur, DOF will make the CB aware of the extent of non-forest use due to rights held by mineral interests. The nature of the non-forest use for minerals and ROWs consist mostly two natural gas storage fields and associated well head sites used by Columbia Gas Transmission at Mohican SF and Hocking SF. These well head sites have been cooperatively managed to minimize tree clearing around the sites to <0.25 ac each. Acreage in well sites are approximately 15 acres total for each forest. Acreage of transmission line clearing is roughly 80 acres for each of the two forests.</p>
<p>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>7.1. The management plan and supporting documents shall provide:</p> <p>a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species</p>	C	

<p>selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</p> <p>i) Description and justification of harvesting techniques and equipment to be used.</p>		
<p>7.1.a The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	<p>C</p>	<p>Legal status of the state forests is clearly established and are addressed in chapter 1 of the LMM (LMM is used for laws, zoning, pre-harvest assessment, policy, procedures, monitoring forms, and more).</p> <p>Third party rights are known and the title review process ensures that unsubstantiated and unknown rights are extinguished.</p>
<p>7.1.b The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</p>	<p>C</p>	<p>History of land use is detailed in the 5-year management plan. Current forest types and attributes are tracked in DOF inventory and GIS database, confirmed with multiple queries of the GIS and Forest data.</p>
<p>7.1.c The management plan describes:</p> <p>a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.</p>	<p>C</p>	<p>a) thru d) are incorporated into the 5-year management plan in part and also the DFC document and the LMM.</p>

<p>7.1.d The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.</p>	<p>C</p>	<p>Landscape elements are discussed in the forest-specific management plans and the RSA and HCVF assessments. Plans rely on landscape-level data sets used in the Forest Action Plan and the FIA reports on landscape conditions on the surrounding forests.</p>
<p>7.1.e The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</p> <ul style="list-style-type: none"> • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9); • Other special management areas. 	<p>C</p>	<p>These items are addressed not only the forest plans but more specifically in the LMM and the RSA and HCVF assessments.</p> <p>DOF has an expanding compendium of planning documents that, collectively, constitute the “management plan” for the state forests and that cover the subject areas required in this Criterion:</p> <ul style="list-style-type: none"> • The Land Management Manual • The Shawnee Wilderness Plan • The 2008 Strategic Plan for State Forests • Forest-Specific 5-year management plans • Forest-Specific Annual Work Plans • The Backcountry Area Management Plan • Grouse and Turkey Area Management Plan
<p>7.1.f If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).</p>	<p>C</p>	<p>DOF outlines specific projects in the forest-specific annual work plans. DOF also has specific state-wide and forest-wide invasive species control programs. DOF addresses this in the LMM chapter 9.</p>
<p>7.1.g The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).</p>	<p>C</p>	<p>DOF addresses this in the LLM chapter 10 - forest protection.</p>
<p>7.1.h If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.</p>	<p>C</p>	<p>DOF addresses this in the LLM chapter 10 - forest protection. Plans in place for each application.</p>

<p>7.1.i If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.</p>	<p>C</p>	<p>DOF addresses this in the LLM chapter 10 - forest protection.</p>
<p>7.1.j The management plan incorporates the results of the evaluation of social impacts, including:</p> <ul style="list-style-type: none"> • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g). 	<p>C</p>	<p>5-year management plan for state forests. A full discussion of social impact monitoring is located in chapter 12 of the LMM. DOF uses the Forest Action Plan process, public participation process, civic activities, recreation program, and many other sources to determine social impacts. Results are considered in the Integration Committee (Management Review Committee) and are plans are updated every 5 years. Plans available on the DOF website.</p>
<p>7.1.k The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</p>	<p>C</p>	<p>Forest management plans include section on infrastructure. Annual work plans outline specific road maintenance activities. DOF's approach to maintenance of roads is outlined in 6.5.</p>
<p>7.1.l The management plan describes the silvicultural and other management systems used and how they will</p>	<p>C</p>	<p>DOF focus on oak ecology and management is well communicated in the strategic plan, forest plans, and in the LMM. This is mostly outlined in the LMM and</p>

sustain, over the long term, forest ecosystems present on the FMU.		the use of the SILVAH Oak prescription support tool. This is also linked to the zones discussed in Chapter 2 of the LMM.
7.1.m The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.	C	G&Y, harvest levels, and inventory are detailed in each forest plan and in the LMM.
7.1.n The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	C	Monitoring is detailed in the forest plans and a full discussion is located in the LMM.
7.1.o The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.	C	DOF has a forest information system where all tracking and mapping is housed. Large forest-level maps and unit-level activity maps are displayed at open houses and are appendices of each plan.
7.1.p The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.	C	This is outlined in the timber sale contracts, stand-level prescriptions, and compartment reviews. Local industry has specific limited range of equipment options. DOF labors to control the harvesting techniques used. All management plans include this language to comply with this indicator.
7.1.q Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.	C	This is outlined in the LMM and is applied through DOF’s stand-level prescriptions, marking estimate process, burn plans, and precommercial activity plans which detail the specs for all activities.
7.1.r The management plan describes the stakeholder consultation process.	C	DOF has provided stakeholders with a “pathways to participation” document that is both on the DOF website and in the LMM.
7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific	C	

<p>and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>		
<p>7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.</p>	C	<p>DOF has established monitoring and review system with the Integration Committee (management review committee) as well as several other monitoring activities. Forest Management plans are intended to last for 5 years and currently the next revision is being planned and is outlined in the LMM. Annual work plans are yearly. LMM is updated as needed. DOF revised 5-year plans to include a statement that plans will be revised every 5 years.</p>
<p>7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</p>	C	
<p>7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.</p>	OBS	<p>ODNR uses 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. The audit team reviewed training logs for ODNR staff, including a newly hired forester. Annual training records retained centrally and records for one full set of annual employee training records were reviewed. Some training examples include:</p> <ul style="list-style-type: none"> • Health, safety, and workplace trainings admin’ed by HR • Fire trainings admin’ed by the fire program • Law enforcement program • Land management program: timber sale admin, cultural resources, T&E species, silviculture, and certification • Employee specific training, based on performance measures and position descriptions, & responsibilities related to forest management and certification • DOF requires logging companies to be certified Master Loggers and loggers

		<p>interviewed during the audit were confirmed to be certified in the OFA Master Logger Database</p> <p>During site visits to Sale 1412 and AF Merchandising Sale A-6, wetland plants were identified in small areas next to and across main skid trails that did not appear on routine surveys or in the database review as a mapped wetland.</p> <p>During the 1412 field visit, cattails and rushes were seen on both sides of and in the skid road next to the retained rock outcrop, adjacent to the large central landing. Per interview with the forester, wetland plants were not identified prior to the harvest, but the spot was wet and mats were used to cross it.</p> <p>During the AF Merch A-6 field visit, cattails were identified next to and in the skid road downhill of the main access road. Per interview with the forester, this area was dry and wetland plants not present prior to or during the sale.</p> <p>Cattails (<i>Typha</i> spp.) were observed by the audit team and while NOT confirmed to be present during site visits, Narrow-leaved and hybrid Cattail (<i>Typha angustifolia</i>, <i>T. x glauca</i>) are included in the list of Invasive Plants of Ohio.</p> <p>Forest workers should be provided with sufficient guidance and supervision to adequately implement their respective components of the plan. See 2015.9</p>
<p>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.</p>	<p>C</p>	
<p>7.4.a While respecting landowner confidentiality, the management plan or a management plan summary that</p>	<p>C</p>	<p>DOF has engaged stakeholders on their plans and the planning process in general. All documents are available for comment at open houses and public</p>

<p>outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.</p>		<p>meetings. Further, all documents are public record. Many of the documents are readily available for download on the DOF website.</p>
<p>7.4.b Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.</p>	<p>C</p>	<p>During the strategic plan process, DOF engaged partners and the public on the draft plan. During the HCVF assessment and the 5-year plan process DOF again engaged stakeholders in the planning process. Further DOF has posted draft plans on the website prior to the open houses. Stakeholders can review the plans at the open houses and have substantial time to submit comments. Comments received during any public process are reviewed in the Integration Committee. The LMM was posted on DOF’s website for public review.</p>
<p>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts. <i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p>8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p>	<p>C</p>	
<p>8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.</p>	<p>C</p>	<p>The written monitoring protocol is outlined in chapter 12 of the LMM. Monitoring is multi-faceted and monitoring efforts include the compartment review process, GIS analysis, G&Y, logging inspections, forest health monitoring, and program reports.</p>
<p>8.2. Forest management should include the research and data collection needed to monitor, at a</p>	<p>C</p>	

<p>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>8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	<p>C</p>	<p>DOF maintains an inventory database, G&Y monitoring, and a GIS program. DOF relies on the 20-yr compartment review process for monitoring of a) thru f). 80% of state forest acreage has a complete inventory in the past 5 years and data is used in G&Y calculations. DOF also relies on FIA averages and trends for the remaining 20% of state forest acreage, and has future plans to procure inventory on this remaining acreage.</p> <p>Audit team reviewed records related to monitoring of timber harvests, costs and productivity associated with management, post-harvest monitoring checklists, and road maintenance monitoring forms.</p>
<p>8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	<p>C</p>	<p>The Forest Health program has a monitoring protocol and results are disseminated both on an annual basis and more frequently via the distribution of the PEST news and the annual Forest Health Conference. Local unanticipated loss or vulnerability (such as ice storm damage, insect mortality, etc) is documented, reviewed, prescribed, and treated as needed.</p> <p>DOF also supports a variety of ongoing specialized research and monitoring activities at Vinton Furnace State Experimental Forest.</p>
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	<p>DOF maintains a database of harvest volumes that includes decades of data. This database is central to the statutory requirements of revenue distribution to local governments.</p>
<p>8.2.c The forest owner or manager</p>	<p>C</p>	<p>1) DOF relies on other DNR agency such as the DOW</p>

<p>periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their <i>habitats</i>; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4). 		<p>to provide data relating to RTE species through the procedures and mechanism outlined the LMM (e.g. the Biodiversity Database, biologist review, and RTE mgmt. training for staff);</p> <ol style="list-style-type: none"> 2) DOF relies on partnerships with USFS FIA and USFS NA Research on the mgmt. and maintenance of Oak Hickory ecosystems and their restoration; 3) DOF has two programs: one dealing with private lands and one dealing with state forests that are designed to directly give forestry assistance and treatment of invasive plants; DOF also is a supporter of USFS NA Research that involves location and treatment options for invasives on state forests; 4) Detailed in field assessment forms and Reserves descriptions; 5) Monitoring of HCVF is discussed in chapter 1 of LMM and in the HCVF assessment document. <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>8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	<p>C</p>	<p>DOF has a logging inspection procedure and pre-commercial activity inspection procedure that responds to this indicator. The procedure is outlined in chapter 8 and 9 of the LMM. DOF worked with the USFS Delaware research lab to formulate a monitoring protocol and included this in chapter 12 of LMM. A summary of monitoring results is available publicly.</p> <p>Monitoring noted on each site visit by forester and maintained in the file.</p>
<p>8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	<p>C</p>	<p>DOF has a cooperative roadway maintenance agreement with the Ohio DOT. DOF personnel monitor roads are part of the agreement. Timber road construction is infrequent, most forest have plenty of access. Forest staff regularly monitors recreation trails in cooperation with rec groups as part of their annual duties. A limited-use road monitoring and inspection form were formulated and included in chapter 12 of LMM.</p>
<p>8.2.d.3 The landowner or manager</p>	<p>C</p>	<p>Socio-economic impact monitoring is outlined in</p>

<p>monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).</p>		<p>chapter 12 of the LMM. See also DOF’s recreation program, marketing and utilization program, public participation efforts, and the Forest Action Plan.</p>
<p>8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.</p>	<p>C</p>	<p>Outlined in DOF’s “pathways to participation” and management review procedures. Stakeholder comments on DOF management are monitored primarily through open houses and tracking of comments. Comments solicited during open houses, public meetings, and plan revisions are addressed by the Integration Committee. DOF maintains a catalog of public records requests and disputes.</p>
<p>8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).</p>	<p>C</p>	<p>Outlined in Principle 3 above. DOF consults with tribal representatives, Hopewell NHP, and Newark Earthworks.</p>
<p>8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.</p>	<p>C</p>	<p>Management and fiscal section monitor costs and revenue in order to adjust to difficulties in the state budget. Programs monitor their respective activities and report to management and decisions are made in the Integration Committee upon review of reports.</p>
<p>8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</p>	<p>C</p>	
<p>8.3.a When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each</p>	<p>C</p>	<p>DOF has a merchandized log sale program where sorted logs of bucked and graded logs are sold on the roadside. CoC procedures for the DOF merchandising log yard are outlined in the LMM chapter 12. Procedures for harvesting, transporting, and selling logs in the program ensure there is no mixing of products from outside sources. CoC procedures for stumpage sales have been formulated.</p>

<p>harvested product from its origin to the point of sale.</p>		
<p>8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.</p>	<p>NC</p>	<p>LMM chapter 12 details what is required for documentation of the different types of sales. <i>Stumpage sales</i> include required information in the Timber Sale contract.</p> <p><i>Material from the Zaleski sawmill:</i> State Forest Load Tickets for CoC material from the Zaleski SF sawmill must include: "<u>Information Required on State Forest Load Tickets</u>: Forest, County, Township, Compartment Designation, Management Unit/Cutting Section, date, general description of the location, and an accurate tally of each log based on dib (small end) and length to obtain volume, and the species." No CoC sales of sawmill material have occurred in the past three years.</p> <p><i>Merchandized bucked and sorted roadside logs:</i> Viewed a sample of scale tickets from Merchandised Sales and corresponding line items in spreadsheet - Report Timber Sale 2015-10-13.xls – worksheet "FY15 Load Tickets" showing mileage, date, Load Ticket number, etc. Scale tickets were tracked in the above noted spreadsheet, confirming the forest of origin and general location, based the active timber sales on the provided date, the name of scale, and the miles traveled between the forest of origin, the off-forest scale (as noted on the State Forest Weight Slips), & the merchandising yard. However, this does not enable tracing from origin to point of sale, as material traveled off-forest prior to being sold at the merchandising yard. These also did not include the information noted in the LMM under Information Required on State Forest Load Tickets, as noted above.</p> <p>See 2015.10</p>
<p>8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</p>	<p>C</p>	
<p>8.4.a The forest owner or manager monitors and documents the degree to</p>	<p>C</p>	<p>Incorporated into DOF's planning process and integration committee management review. Also</p>

<p>which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.</p>		<p>incorporated into regular discussions with the Forest Advisory Council. Per interview with the Assistant Chief, DOF completes monthly and annual reports to track progress to meeting management objectives.</p>
<p>8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.</p>	<p>C</p>	<p>Addressed via the statements to achieve and maintain FSC certification of state forestland. Also outlined in chapter 1 of LMM that deal with procedures to address CAR's and other adjustments to management. Annual reports are used to report on qualitative and quantitative information on meeting objectives. If any major issues are detected, leadership staff may decide that a change in the management plan or its components are necessary.</p>
<p>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.</p>	<p>C</p>	
<p>8.5.a While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.</p>	<p>C</p>	<p>All documents are public record. All plans and activities are presented in open houses along with G&Y, social impact monitoring, and many other reports and data available on the Division website. Annual reports primarily include the results of monitoring and are available to the general public.</p>
<p>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p>		

<p>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</p> <p>b) Forest areas that are in or contain rare, threatened or endangered ecosystems</p> <p>c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)</p> <p>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>		
<p>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>C</p>	
<p>9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	<p>C</p>	<p>An HCVF assessment was conducted in preparation for the 2010 initial evaluation. In brief, the assessment was conducted based on data from the heritage database (since renamed the Ohio Biodiversity database). Areas where identified based on concentrations of hits in the database, and were reviewed with stakeholders.</p> <p>DOF has had a land classification/zoning system in place for 20+ years. In preparing for undergoing the FSC certification evaluation process, DOF realigned the zoning system and created a new Zone 1 which is for areas possessing high conservation values.</p> <p>DOF conducted a HCVF assessment with an explicit effort to follow the FSC’s HCVF requirements, using the FSC-US HCVF Assessment Framework.</p> <p>No Type 1 or 2 old growth was identified as part of the HCVF assessment. Some old growth 2 potential is found on the Mohican SF - a few thousand acres in the wilderness area are already set aside from management by virtue of being located in the</p>

		<p>wilderness area.</p> <p>Other examples of HCVF are: Shawnee Wilderness Area Oak Openings Restoration</p> <p>DOF's GIS system is readily capable of mapping all HCVF areas.</p>
<p>9.1.b In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.</p>	C	<p>DOF utilized the Forest Advisory Council as a consultative mechanism for soliciting HCVF-related input from a cross-section of stakeholders. DOF also engaged other Agencies and groups to secure input as part of the HCVF Assessment. Additionally, a public meeting was held expressly for the purpose of sharing the results of the HCVF assessment.</p> <p>Responses to the solicitations were relatively limited; DOF has an opportunity to improve the consultation process, over time.</p> <p>Refer to OBS 2015.1</p>
<p>9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.</p>	C	<p>A summary of the assessment of results for identifying areas possessing high conservation values and the management strategies employed for maintaining or enhancing those values is readily available to the public at http://forestry.ohiodnr.gov/stateforestcertification.</p> <p>The audit team confirmed that the HCVF assessment document was available on the ODNR website, describing the process for analyzing HCVF and the results of the analysis.</p>
<p>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	C	
<p>9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and</p>	C	<p>ODOF solicited feedback from the public during its HCVF designation process, including holding public meetings. Direct consultations were held mostly with DOW and DNAP while other groups offered limited comment or none at all. Confirmed with a review of</p>

<p>that appropriate options for the maintenance of their HCV attributes have been adopted.</p>		<p>open house sign-in sheets and compiled stakeholder comments.</p>
<p>9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.</p>	<p>C</p>	<p>A public meeting was advertised and held at the Athens office and attended by 23 individuals. DOF presented maps and management options both at the public meeting and again at the summer open houses. DOF recorded their comments and some elected to give written comments. A summary of their comments is included in the HCVF Assessment.</p>
<p>9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	<p>C</p>	
<p>9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>	<p>C</p>	<p>HCVF protection is outlined in the LMM and measures are described in the 5 year management plans. Protection measures usually involve no entry.</p>
<p>9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.</p>	<p>C</p>	<p>Outlined in the LMM and in the forest 5-year management plans.</p>
<p>9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent</p>	<p>C</p>	<p>There are no HCVF areas identified that cross ownership boundaries.</p>

landowners.		
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
<p>9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.</p>	C	<p>Management options in HCVF are very limited and currently include treatment of invasive species. Except for restoration areas at Maumee SF (removal of glossy buckthorn to get native spp, - completed the treatment in 2014 – with monitoring), there will be no extraction of resources in HCVF.</p> <p>DOF has formulated an HCVF monitoring protocol that is located in chapter 12 of the LMM. A companion field inspection worksheet was also formulated. DOF annually monitors a subset of their HCVFs, as noted in the management plan, confirmed with a review of the completed monitoring forms from Shade River during Dec 2014 and Maumee SF during Sept 2015.</p> <p>The annual results are given to forest managers and are listed in the summary of monitoring results. A schedule of HCVF monitoring is located in the LMM as well as in the annual work plans.</p> <p>DOW has agreed to assist in monitoring HCVF areas on a regular basis and provide feedback and comment to DOF.</p>
<p>9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.</p>	C	<p>DOF commits to adjusting management options based on monitoring results. Besides invasive species, there have been no new threats to HCVs identified during regular monitoring activities.</p>

APPENDICES

APPENDIX C: REGIONAL LIMITS AND OTHER GUIDELINES ON OPENING SIZES: Indicator 6.3.g.1		
<p>This Appendix contains regional Indicators and guidance pertinent to maximum opening sizes and other guidelines for determining size openings and retention. These Indicators are requirements based on FSC-US regional delineations.</p> <p>APPALACHIA REGION</p>		
<p>6.3.g.1.a When even-aged silviculture (e.g., seed tree, regular or irregular shelterwood), or deferment cutting is employed, live trees and native vegetation are retained and opening sizes are created within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type, unless retention at a lower level is necessary for restoration or rehabilitation purposes. Harvest openings with no retention are limited to 10 acres.</p> <p>Guidance: <i>Even-age silviculture is used only where naturally occurring species are maintained or enhanced. Retention within harvest units can include riparian and streamside buffers and other special zones. In addition, desirable overstory and understory species may be retained outside of buffers or special zones while allowing for regeneration of shade-intolerant and intermediate species consistent with overall management principals. Where stands have been degraded, less retention can be used to improve both merchantable and non-merchantable attributes.</i></p>	<p>C</p>	<p>DOF has policies for even-aged management, including that harvest openings larger than 10 acres have retention.</p> <p>Field visits confirmed regular use of tree retention ‘islands’, retention of snags, and irregular sale boundaries in areas.</p> <p>Evidence is outlined in the timber harvest prep chapter of the LMM, confirmed with review of multiple Timber Sale documents and observations during field visits.</p>
<p>6.3.g.1.b When uneven age silvicultural techniques are used (e.g., individual tree selection or group selection), canopy openings are less than 2.5 acres.</p> <p>Applicability note: <i>Uneven age silvicultural techniques are used when they maintain or enhance the overall species richness and biologic diversity, regenerate-shade</i></p>	<p>C</p>	<p>DOF does not use uneven-aged techniques with frequency, and most are limited to Northern and Allegheny Hardwoods that consist of more shade-tolerant species. Evidence is outlined in the timber harvest prep chapter of the LMM, confirmed with review of multiple Timber Sale documents and observations during field visits. .</p>

<p><i>tolerant or intermediate-tolerant species, and/or provide small canopy openings to regenerate shade-intolerant and intermediate species. Uneven-age techniques are generally used to develop forests with at least three age classes. Uneven age silviculture is employed to prevent high-grading and/or diameter limit cutting.</i></p>		
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APPENDIX E: STREAMSIDE MANAGEMENT ZONE (SMZ) REGIONAL REQUIREMENTS: Indicator 6.5.e

This Appendix addresses regionally explicit requirements for Indicator 6.5.e and includes SMZ widths and activity limits within those SMZs for the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions. The forest owner or manager will be evaluated based on the sub-indicators within their specific region, below.

APPALACHIA REGION

The SMZ is designed to allow harvesting and provide flexibility for silvicultural management.

<p>6.5.e.1.a All perennial streams have buffers (streamside management zones, SMZs) that include an inner SMZ and an outer SMZ. SMZ sizes are minimum widths that are likely to provide adequate riparian habitat and prevent siltation. If functional riparian habitat and minimal siltation are not achieved by SMZs of these dimensions, wider SMZs are needed.</p>	C	<p>DOF’s SMZ addendum complies with or exceeds FSC APP requirements for minimum buffer widths and management practices. See updated SMZs (Streamside Management Zones from Division of Forestry LMM).</p>
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Table 6.5.f (APP only) Widths of inner and outer Streamside Management Zones. Widths of outer SMZs are applicable where data do not support narrower widths*

Stream Zone Type	SLOPE CATAGORY				
	1-10%	11-20%	21-30%	31-40%	41%+
Inner Zone (Perennial)	25’	25’	25’	25’	25’
Outer Zone (Perennial)	55’	75’	105’	110’	140’
Total For Perennial	80’	100’	130’	135’	165’
Zone For Intermittent	40’	50’	60’	70’	80’

*All distances are in feet -slope distance and are measured from the high water mark.

<p>6.5.e.1.b (APP only) The inner SMZ for <i>non-high-quality waters</i> (see state or local listings describing the highest quality</p>	C	<p>DOF’s SMZ addendum complies with or exceeds FSC APP requirements for minimum buffer widths and management practices. See updated SMZs (Streamside Management Zones from Division of</p>
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<p>waters in the state or region) extends 25 feet from the high water mark. Single-tree selection or small group selection (2-5 trees) is allowed in the inner SMZ, provided that the integrity of the stream bank is maintained and canopy reduction does not exceed 10 percent (90 percent canopy maintenance). Trees are directionally felled away from streams. Note: The inner SMZ is designed as a virtual no-harvest zone, while allowing the removal of selected high-value trees.</p>		<p>Forestry LMM).</p>
<p>6.5.e.1.c (APP only) Along perennial streams that are designated as <i>high-quality waters</i> (see state or local listings describing the highest quality waters in the state or region), no harvesting is allowed in the inner SMZ (25 feet from the high water mark), except for the removal of wind-thrown trees. Stream restoration is allowed if a written restoration plan provides a rational justification and if the plan follows local and regional restoration plans.</p>	<p>C</p>	<p>DOF’s SMZ addendum complies with or exceeds FSC APP requirements for minimum buffer widths and management practices. See updated SMZs (Streamside Management Zones from Division of Forestry LMM).</p>
<p>6.5.e.1.d (APP only) Outer SMZs, outside and in addition to inner SMZs, are established for all intermittent, and perennial streams, as well as other waters. When the necessary information is available, the width of a stream management zone is based on the landform, erodibility of the soil, stability of the slope, and stability of the stream channel as necessary to protect water quality and repair habitat. When such specific information is not available, the width of streamside management zone is calculated according to Table 6.5.f</p>	<p>C</p>	<p>DOF’s SMZ addendum complies with or exceeds FSC APP requirements for minimum buffer widths and management practices. See updated SMZs (Streamside Management Zones from Division of Forestry LMM).</p>
<p>6.5.e.1.e (APP only) Harvesting in outer SMZs is limited to single-tree and group</p>	<p>C</p>	<p>DOF’s SMZ addendum complies with or exceeds FSC APP requirements for minimum buffer widths and management practices. See updated SMZs</p>

<p>selection, while maintaining at least 50 percent of the overstory. Roads, skid trails, landings, and other similar silviculturally disturbed areas are constructed outside of the outer SMZ, except for designated stream crossings or when placement of disturbance-prone activities outside of the SMZ would result in more environmental disturbance than placing such activities within the SMZ. Exceptions may be made for stream restoration.</p>		<p>(Streamside Management Zones from Division of Forestry LMM).</p>
<p>6.5.e.1.f (APP only) The entire SMZ of intermittent streams is managed as an outer buffer zone.</p>	<p>C</p>	<p>DOF’s SMZ addendum complies with or exceeds FSC APP requirements for minimum buffer widths and management practices. See updated SMZs (Streamside Management Zones from Division of Forestry LMM).</p>
<p>6.5.e.1.g (APP only) The activities of forest management do not result in observable siltation of intermittent streams. The activities of forest management do not result in observable siltation of intermittent streams.</p>	<p>C</p>	<p>DOF’s activities did not result in any observable siltation of intermittent streams, per field observations.</p>

Appendix 6 – Tracking, Tracing and Identification of Certified Products

SCS FSC Chain of Custody Indicators for Forest Management Enterprises Version 5-1: 12/03/12

<p>REQUIREMENT</p>	<p>C/ NC</p>	<p>COMMENT/CAR</p>
<p>1. Quality Management</p>		
<p>1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.</p>	<p>NC</p>	<p>Management representative not appointed per document review. See 2015.10</p>

<p>1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.</p>	<p>NC</p>	<p>Training records for regular staff maintained, but part-time/seasonal loggers do not have training records, as they were not trained. Records of pesticide use are retained for three years, rather than the required 5 years. In instances where the receipt/invoice does not travel with the material when sold from a DOF concentration yard, shipping documentation is not provided.</p> <p>See 2015.10</p>
<p>1.3 The FME shall define its forest gate(s) (check all that apply): <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i></p>	<p>C</p>	<p><input checked="" type="checkbox"/> Stump <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.</i></p> <p><input checked="" type="checkbox"/> On-site concentration yard <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p><input checked="" type="checkbox"/> Off-site Mill/Log Yard <i>Transfer of ownership occurs when certified-product is unloaded at purchaser's facility.</i></p> <p><input type="checkbox"/> Auction house/ Brokerage <i>Transfer of ownership occurs at a government-run or private auction house/ brokerage.</i></p> <p><input checked="" type="checkbox"/> Lump-sum sale/ Per Unit/ Pre-Paid Agreement <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.</i></p> <p><input checked="" type="checkbox"/> Log landing <i>Transfer of ownership of certified-product occurs at landing/yarding areas.</i></p> <p><input type="checkbox"/> Other (Please describe):</p>

<p>1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.</p>	<p>NC</p>	<p>DOF seasonal contracted loggers will cut and haul logs to a location on Forest (pre-determined spot). Contracted logger takes the material to be weighed at a commercial scale off Forest for weight and then brings it back to a yard on Forest land. Contract is not site specific, it is over the FMU and they are part-time seasonal employees (about 15% of sales).</p> <p>No sufficient control is present for material that is sold as Merchandised Product sale. There is the risk for non-certified material to be mixed with certified forest product prior to the transfer of ownership.</p> <p>See 2015.10</p>
<p>1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation.</i></p>	<p>NC</p>	<p>Small fixed sawmill on the Zalenski State forest will process DOF logs into lumber. CoC requirements are not being met, as the material is sometimes traveling off the SF prior to being received at the sawmill and is not identifiable or separable. There is a risk that non-certified material can enter the Chain, as these materials are processed by the Zalenski Sawmill prior to transfer of ownership.</p> <p>See 2015.10</p>
<p>2. Product Control, Sales and Delivery</p>		
<p>2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).</p>	<p>NC</p>	<p>Logger has a trip ticket with load number with a from location (general location noted, such as Brush Creek), what scale they are traveling to, and empty & scaled weight. Tickets are turned into DOF once per week. Trip Tickets viewed: Load #s21,22,23, & 24 from Brush Creek with Product noted as “Wood” or “Stringers”.</p> <p>No FSC information is noted on the trip ticket. Logs leaving the landing are not identifiable as certified once they leave the Forest gate.</p> <p>See 2015.11</p>
<p>2.2 The FME shall maintain records of quantities/volumes of FSC-certified product(s).</p>	<p>NC</p>	<p>Volumes of logs sold and what is sold as certified, were not compiled for the audit, examples were viewed in the “Report Timber Sale” spreadsheet.</p> <p>See 2015.11</p>

<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <p>a) name and contact details of the organization;</p> <p>b) name and address of the customer;</p> <p>c) date when the document was issued;</p> <p>d) description of the product;</p> <p>e) quantity of the products sold;</p> <p>f) the organization’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code;</p> <p>g) clear indication of the FSC claim for each product item or the total products as follows:</p> <p style="padding-left: 20px;">i. the claim “FSC 100%” for products from FSC 100% product groups;</p> <p style="padding-left: 20px;">ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups.</p> <p>h) If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other.</p>	<p>NC</p>	<p>Receipt/Invoice were reviewed for the following:</p> <ul style="list-style-type: none"> • J Hobbs/Universal Veneer, dated 02/23/15 for 30 white oak logs, lot #2 • Superior Hardwoods of Ohio, dated 04/27/15, various lots • M. Bohlke Veneer Corp., dated 05/18/15, Lot #6, 40 logs • Stockmeister, dated 05/16/12 for beams, rafters, posts, decking, & soffit. <p>All receipts include b) through g). A) is not complete, as document template does not include the contact details of the ODNR-DOF, only the name. At this time, separate transportation documents are not issued. See below.</p> <p>See 2015.11</p>
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<p>2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product.</p> <p>Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2</p>	<p>NC</p>	<p>See above.</p> <p>Shipping documents are not used, but material may travel by a contracted carrier that does not receive the receipt/invoice.</p>
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<p>2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company’s webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria:</p> <ul style="list-style-type: none"> a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence. <p><i>FSC-ADVICE-40-004-05</i></p>	<p>NA</p>	<p>No exemption has been sought.</p>
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3. Labeling and Promotion		<input type="checkbox"/> n/a
3.1 Describe where/how the organization uses the SCS and FSC trademarks for promotion.	NC	<p>Logo use is noted on the website, www.forestry.ohdnr.gov/forestmanagement however it is an incorrect on-product logo use, rather than a promotional use. No on-product logo usage occurs. FSC and Forest Stewardship Council are also present on the website and do not include the required ® trademark symbol after the first use in the text.</p> <p>The email documents referenced below acknowledge that the correct promotional logo should have been uploaded onto the website, rather than the on-product logo, however other DNR staff (not DOF) control website content and did not correct the logo use prior to uploading it on the website</p> <p>See 2015.12</p>
3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.	C	FME Certification Coordinator provided email documentation of the logo use request and approval from 03/08/11. Approval was received for use of the FSC promotional logo on the DOF website.
3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.	C	Email permission to use the promotional logo was viewed from 03/08/11 from Rachel Lem at SCS.
4. Outsourcing		<input checked="" type="checkbox"/> n/a
4.1 The FME shall provide the names and contact details of all outsourced service providers.		

<p>4.2 The FME shall have a control system for the outsourced process which ensures that:</p> <ul style="list-style-type: none"> a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use. 		
<p>5. Training and/or Communication Strategies</p>		
<p>5.1 All relevant FME staff and outsourcers shall be trained in the FME's COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME's COC control system.</p>	<p>NC</p>	<p>Annual training is noted; training completed 10/01/15, confirmed with a review of signed training logs, however FSC COC was not part of that training.</p> <p>See 2015.13</p>

<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).</p>	<p>NC</p>	<p>Annual training/communication is noted; DOF training completed 10/01/15, confirmed with a review of signed training logs and materials presented, annual training is noted.</p> <p>Training records are not maintained for season loggers. See 2015.13.</p>
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