

Appendix D: Gap Analysis Matrix for Michigan State Forests

Opportunities for Improvement; Practices that Exceed Expectations; and Auditor Notes

Sites Visited:

Day 1 (Monday October 25, 2004)

DNR Offices, Lansing, Michigan

8 am to 2 pm – overview of DNR Divisions

2 pm to 4 pm – stakeholder interviews

Day 2 (Tuesday October 26, 2004)

Roscommon Operations Service Center

Roscommon Unit Office

Roscommon Field Visits (am)

Grayling Field Visits (pm)

Day 3 (Wednesday October 27, 2004)

Mike Ferrucci: Gladwin Unit

Robert Hrubes: Traverse City Unit

Dave Capen : Gaylord Unit

Day 4 (Thursday October 28, 2004)

Mike Ferrucci: Shingleton Unit, 360,000 acres

Robert Hrubes: Eastern UP District Office, Newberry (1 million acres/ecoregional planning)

Dave Capen: Escanaba Unit, Crystal Falls Unit

Day 5 (Friday October 29, 2004)

Marquette Service Center – interviews/ meeting with staff (am)

Closing Briefing (pm)

Abbreviations Used:

ADA Americans with Disabilities Act

BOH Bureau of History, Arts, and Libraries

FTP Forest Treatment Proposal

FMFM Forestry, Minerals, and Fire Management Division (of MI DNR)

F.V.S. Forest Visualization System: a US Forest Service computer program used to project future stand conditions using existing inventory data and computer models for tree growth and mortality

MI DNR Michigan Department of Natural Resources

O.I. Operations Inventory

SIC State Implementation Committee: an official SFI-affiliated Michigan organization working on a range of sustainable forestry activities

S.H.P.O. state historic preservation office: in Michigan History, Arts, and Libraries (HAL) is the S.H.P.O.

Opportunities for Improvement (OFI):

2.1 Indicator 6: There is an opportunity to improve strategic planning, including long-term & large-scale factors, to enable improved assessment of impacts and opportunities for management of composition when making planting decisions.

4.1 Indicator 1: Field staff require additional guidance on types of stands to nominate for Biodiversity Management Areas and management practices available once areas are designated.

4.1 Indicator 2: There is an opportunity to provide more training and to involve field foresters in reconnaissance for T&E species during O.I.

Practices that exceed expectations:

2.4 Forest protection programs are a clear strength, with particular emphasis on maintaining healthy stands and on a range of fire protection programs and strategies (training, research, outreach, preparedness).

5.1 MI DNR programs for visual management have produced excellent on-the-ground results.

6.1 The identification and management of special sites is a clear strength of the MI DNR program.

7.1 Field observations confirmed excellent utilization practices at harvest sites visited.

9.1 MI DNR has strong, long-term record of providing funding for and participating in research.

12.2 Indicator 2: Public outreach and involvement are clear strengths of the MI DNR program.

12.2 Indicator 3: Recreation facilities are developed for many different uses across the state. Efforts are made to provide access for disabled visitors, with ADA guidelines followed for new or reconstructed facilities. However, steady increases in recreational demands are threatening to overwhelm resources.

Additional Data on Chemical Use:

For the past five seasons (2000-2004), the total red pine activity for the state forest lands located in the Eastern FMFM District in the Lower Peninsula was as follows: of the 763 acres of red pine planted, 232 acres received herbicide site preparation, and 61 acres of these had a second (“release”) herbicide application. These amounts should be contrasted against the total 500,000 acres inventoried during this time and the tremendous loss of red pine acreage from the landscape -- red pine acres herbicided amount to .05% (1/20th of 1 percent) of the inventoried acres. For the other northern lower Forest Management Units the amount was even less (only 33.5 red pine acres received any herbicide treatments between 2000 and 2004 the Western FMFM District in the Lower Peninsula).

Reforestation on all state forest lands, 2000-2004:

Planting (includes seeding) -ALL SPECIES	20,577 ac
Kirtland Warbler jack pine plantings	6,910 ac
Planting (red pine)	5,477 ac

Herbicide use on all state forest lands, 2000 – 2004:

Site prep using chemicals	706 ac
Release using chemicals	2,693 ac

Source: MI DNR

SFIS Gap Analysis Matrix

NSF-ISR auditors use a similar SFIS Certification Audit Matrix to record their findings for each SFIS Performance Measure and Core Indicator. Where a major or minor non-conformance is found, the auditor would normally fully document the reasons for the nonconformity on a Corrective Action Request (CAR) form. If the Performance Measure does not apply, N/A is placed in the appropriate Auditor Note section. For this gap analysis the columns for non-conformances were replaced with a column labeled “Gap”. These items may be areas where there is no program or activity, where the required activity is not documented, or where there is no objective evidence.

SFIS Objectives for Land Management

Objective 1: Broaden the implementation of sustainable forestry by employing an array of economically, environmentally and socially sound practices in the conservation of forests including appropriate protection, growth, harvest and use of those forests using the best scientific information available.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
4.1	<i>Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth and yield models and written plans.</i>	Note new numbering system. 4.1 was formerly 4.1.1.1.4 Two gaps were identified, one of which has multiple parts. Longer-term, larger-scale planning efforts are incomplete.			2	
1	A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including: a. a periodic or ongoing forest inventory; b. a <i>land classification</i> system; c. soils <i>inventory</i> and maps, where available; d. access to <i>growth and yield modeling</i> capabilities; e. up-to-date maps or a <i>Geographic Information System (GIS)</i> ;	It is understood that MI DNR does not currently have an integrated, comprehensive resource analysis, which may be a significant gap for such a large land ownership. During the full audit the certification team will need to understand the breadth of non-timber planning that covers large areas and longer (than ten-year) time frames, and the degree to which compartment reviews are informed by other planning processes. a. O.I. of 10% of compartments annually; b. Land Type Associations, Kotar system, and pre-European settlement maps from G.L.O. records; c. Soils information is available on GIS; d. MI DNR has access to Growth and yield modeling, which has been occasionally used, for example with the red pine project. All Forest Management Units will have direct access to G&Y modeling as it is incorporated into IFMAP. This capability will be explored during the certification audit to determine whether it meets the spirit and intent of the SFI standard; e. Excellent GIS system universally employed;				

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Criteria		Auditor Notes	FC	EXR	Gap	OFI
	f. recommended sustainable harvest levels; and g. a review of non-timber issues (e.g., including pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).	f. Detailed, spatially explicit data collected through OI provides a basis for developing and documenting available harvest levels on an ongoing, but only 3-year forward-looking, basis. Recommended annual harvest levels are developed jointly by professional foresters, wildlife biologists, and fisheries biologists. A key objective in making forest prescriptions is balancing resource needs (condition of the various forest cover types) with the long-term goal of attaining an even distribution of size and age classes for long-term sustainability. g. Some strategic level analyses and planning efforts focused on high profile non-timber issues such as Kirtland's warbler and river corridors exist. Absent completed ecoregional planning, the primary tactical planning process (OI, IFMAP, and Compartment Reviews) that is focused on timber and habitat management on a ten year review cycle does not appear to address nontimber issues in the broad landscape context (larger spatial-scales than compartments).			F. G.	
2	Documentation of annual harvest trends in relation to sustainable forest management plan.	A gap exists relative to clearly stated planned harvest levels beyond the three YOEs normally in planning/ operations que, or across larger spatial scales (i.e. districts or forest wide). Acreage target from Mich. Silvicultural Analysis appears not to be accepted by all stakeholders as definitive.			X	
3	A forest inventory system and a method to calculate growth.	O.I. are consistently completed on 10% of compartments annually. Past growth can be calculated by comparing two different inventory periods, adjusting for harvesting.	X			
4	Periodic updates of inventory and recalculation of planned harvests.	O.I. of 10% of compartments annually; Inventory consistently updated on 10-year cycle. Recalculate harvests annually based on compartment exam process.	X			
5	Documentation of forest practices (e.g., planting, fertilization, thinning, etc.), consistent with assumptions in harvest plans.	No Allowable Cut Effect is assumed, so there is no concern about overly optimistic harvesting levels based on growth acceleration due to forest practices. Forest practices (FTPs) are consistently tracked.	X			

Old 4.1.1.1.1	<i>Program Participants shall have policies to implement and achieve the Sustainable Forestry Standard Principles and Objectives.</i>
Old 4.1.1.1.2	<i>Program Participants shall (individually, through cooperative efforts or through associations) provide funding for forest research to improve the health, productivity and management of all forests.</i>
Old 4.1.1.1.3	<i>Program Participants shall provide recreation and education opportunities for the public where they are consistent with their forest management objectives.</i>
Old 4.1.1.1.4	<i>Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth and yield models and written plans.</i>

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Objective 2: Ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation and other measures.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
2.1	<i>Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within five years.</i>	Despite one very limited gap and one OFI, this is generally a clear strength of the MI DNR program. Regeneration is nearly always achieved, although providing assurance of meeting the five-year target will be challenging.			1	1
1	Designation of all management units for either natural or artificial regeneration.	Timber sale preparation and internal review process confirms any regeneration decision made during O.I. and compartment review	X			
2	Clear criteria to judge adequate regeneration and appropriate actions to correct under-stocked areas and achieve desired species composition and stocking rates for both artificial and natural regeneration.	There were some examples of failed regeneration highlighted during the scoping assessment, although these appear to be limited in scope. Difficult regeneration situations are widely understood by field foresters throughout the FMFM Division. When regeneration is difficult, Michigan DNR obtains resources to promote the achievement of regeneration. When natural regeneration fails planting is done, although not always within five years. O.I. system timing is such that regeneration surveys for natural regeneration do not generally occur until 5 or more years following harvest			X	
3	Plantings of exotic tree species are <i>minimized</i> . Research documentation is available that exotic tree species, planted operationally, pose minimal risk.	Observations confirmed native species are extensively planted, that no exotics are planted, and that exotic trees and plants are actively removed or their spread is limited.	X			
4	Protection of desirable or planned advanced natural regeneration during harvest.	Observations confirmed that desirable natural regeneration is protected during harvest.	X			
6	Artificial reforestation programs consider potential ecological impacts when using a different species or species mix from that which was harvested.	All prescriptions for planting are reviewed by a forester, wildlife, and fisheries biologists, who all consider potential ecological impacts. OFI: Strategic planning, including long-term & large-scale factors, to enable improved assessment of impacts and opportunities for management of composition.				X

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Criteria		Auditor Notes	FC	EXR	Gap	OFI
2.2	<i>Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the forest environment.</i>	MI DNR uses forest chemicals sparingly in most cases. One Gap identified may be resolved by consistent application of the Red Pine plan.			1	
1	Minimize chemical use required to achieve management objectives.	Chemical site preparation and release occurs on some Red Pine sites in the northern portion of the lower peninsula. The Red Pine plan provides guidance for matching species to site. Aside from this exception, chemical use is minimal on state forests, with many efforts taken to achieve management objectives without chemicals. Example: Jack Pine is often regenerated using trenching followed by seeding or planting. See “Auditor Notes” on second page of Matrix for Additional Data on Chemical Use supplied by MI DNR.			X	
2	Use of least toxic and narrowest spectrum pesticide narrowest spectrum and least toxic pesticides necessary to achieve management objective.	Pesticides used are narrow spectrum.	X			
3	Pesticides must be registered for the intended use and applied in accordance with the label requirements.	Only registered pesticides are used.	X			
4	Use of Integrated Pest Management where feasible.	An IPM approach is the de facto standard, with care taken during all stages of inventory, planning, and operations to develop and maintain healthy stands.	X			
5	Designated state-trained or certified applicators supervise forest chemical applications.	Silviculture specialists, who are certified applicators, are involved in chemical use.	X			

Criteria		Auditor Notes	FC	EXR	Gap	OFI
6	Chemicals applied using Best Management Practices appropriate to the situation; for example: - adjoining landowners or nearby residents notified of applications and chemicals used; - appropriate multi-lingual signs or oral warnings used; - public road access controlled during and after applications; - streamside and other needed buffer strips appropriately designated; - positive shut-off and minimal drift spray valves used; - drift minimized by aerially applying forest chemicals parallel to buffer zones; - water quality monitored or other methods used to assure proper equipment use and stream protection of streams, lakes and other waterbodies; - chemicals stored at appropriate locations; state reports filed as required; or - methods used to ensure protection of federally listed threatened and endangered species	Based largely on interviews, the audit team learned of a variety of Best Management Practices, including many of the examples listed in the indicator.	X			
2.3	<i>Program Participants shall implement management practices to protect and maintain forest and soil productivity.</i>	Based on a limited sample of field sites, MI DNR has generally strong performance in this area.			1	
1	Soils maps used where available.	Confirmed that GIS includes soils maps where available in digital form.	X			
2	A process to identify soils vulnerable to compaction and use appropriate methods to avoid excessive soil disturbance.	Planning identifies winter harvest locations based on soils and landforms.	X			
3	Use of erosion control measures to minimize the loss of soil and site productivity.	Observations of harvest areas showed good practices.	X			
4	Harvest conditions are conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails).	Some units with good chip markets were devoid of woody debris.			X	

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Criteria		Auditor Notes	FC	EXR	Gap	OFI
5	Where practicing partial harvesting, vigorous trees are retained consistent with silvicultural norms for the area.	Field observations of many partial harvests showed that vigorous, healthy trees are retained, and that removals focus on least-healthy trees.	X			
6	Criteria to address harvesting and site preparation to protect soil productivity in place.	In some units, field foresters were able to describe criteria for excessive rutting (six-inch ruts for 100 yards or so). BMPs are quite general regarding soil compaction/rutting.	X			
7	Road construction is kept to the minimum necessary to meet management objectives efficiently.	Road construction is minimized, as these lands are generally already well-roaded, except in the U.P. Road maintenance funding appears erratic, and some poorly maintained roads were observed (see 3.1).	X			
2.4	<i>Program Participants shall manage so as to protect forests from damaging agents such as environmentally or economically undesirable wildfire, pests and diseases to maintain and improve long-term forest health, productivity and economic viability.</i>	Forest protection programs are an integral part of the MI DNR's State Forest Management. Forests viewed appeared generally healthy and were managed with careful attention to forest protection issues.		X		
1	Program to protect forests from damaging agents.	Staff are sensitive to pathogens where forests are at risk. Specialists regionally available to provide advise and assistance to field foresters.	X			
2	Forests managed in a healthy and productive condition to minimize susceptibility to damaging agents.	Field observations confirm healthy forests. Fire officers are on staff, focus on recreation areas and fire, also timber.	X			
3	Participation in, and support of, fire and pest prevention and control programs.	Statewide leadership in co-operative fire fighting and protection is a legislative mandate for the FMFM Division. Part of Fed/State Cooperative; Great Lakes Forest Fire Compact; since 1928 Roscommon Equipment Center (REC) has developed fire fighting equipment; observed some equipment design and fabrication work at the REC. Prescribed fire used as a restoration tool.		X		
2.5	<i>Program Participants that utilize genetically improved planting stock including those derived through biotechnology, shall use sound scientific methods and follow all applicable laws and other internationally applicable protocols.</i>	The Performance Measure appears to be met.	X			
1	Program for appropriate research, testing, evaluation and deployment of genetically improved planting stock	No planting stock derived through biotechnology is utilized. More attention to tree improvement program will occur during the full certification.	X			

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Old: Objective 2: Ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation and other measures.

Criteria	
Old 4.1.2.1.1	<i>Program Participants shall reforest after final harvest by planting or direct seeding within two years or two planting seasons, or by planned <i>natural regeneration</i> methods within five years.</i>
Old 4.1.2.1.2	<i>Program Participants shall promote state-level reporting of the overall rates of reforestation success and afforestation.</i>
Old 4.1.2.1.3	<i>Program Participants shall <i>minimize</i> chemical use required to achieve management <i>objectives</i> while protecting employees, neighbors, the public and the forest environment.</i>
Old 4.1.2.1.4	<i>Program Participants shall implement management practices to protect and maintain forest and soil productivity.</i>
Old 4.1.2.1.5	<i>Program Participants shall manage so as to protect forests from damaging agents such as wildfire, pests and diseases to maintain and improve long-term <i>forest health, productivity and economic viability.</i></i>
Old 4.1.2.1.6	<i>Program Participants that utilize <i>genetically improved seedlings</i>, including those derived through <i>biotechnology</i>, shall use sound scientific methods and follow all appropriate federal and state regulations and other internationally applicable protocols.</i>

Objective 3: Protect the water quality in streams, lakes and other waterbodies.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
3.1	<i>Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality laws and meet or exceed Best Management Practices developed under Environmental Protection Agency (EPA)-approved state water quality programs or those developed under other applicable federal, provincial, state or local programs.</i>	Attention to the full range of BMP management requirements appears to be lacking. Three of four indicators have gaps. The scoping (gap analysis) project did not focus on this issue, including only a limited sample of harvest sites and roads.			3	
1	Program to implement state or provincial equivalent BMPs during all phases of management activities.	Road maintenance budgets & systems are a concern. Facilities and roads funding allocated annually by legislature, and 2004 allocation had not been made as of the scoping assessment. Units do not have road management plans – instead, roads are inventoried during O.I. on a rolling ten-year basis. Road planning is done on an annual basis. Maintenance of roads appears quite variable, with BMP violations observed (and more described by staff).			X	
2	Contract provisions specify BMP compliance.	BMP compliance is in new contract specifications	X			
3	Plans are in place to address wet weather events (e.g., inventory systems, wet weather tracts, defining acceptable operational conditions, etc.).	Wet weather / frozen ground tracts are identified. Gap: Clarification of acceptable rutting/ soil compaction.			X	
4	Monitoring of overall BMP implementation.	Interview with FMFM staff revealed that BMP monitoring has been periodic, last done 3+ years ago.			X	

Criteria		Auditor Notes	FC	EXR	Gap	OFI
3.2	<i>Program Participant shall develop (where they do not currently exist), implement, and document, riparian protection measures based on soil type, terrain, vegetation and other applicable factors.</i>	Riparian protection is a clear program strength. However, ever-increasing ORV violations are negatively impacting wetlands, according to some staff.			1	
1	Program addressing management and protection of streams, lakes and other water bodies and riparian zones.	The compartment review process, riparian protection measures, and careful implementation of timber harvests comprise such a program.	X			
2	Streams, lakes and other water bodies riparian zones mapped as specified in state or provincial equivalent BMPs and, where appropriate, identified on the ground.	Riparian buffers are identified on ground when necessary.	X			
3	Plans to manage or protect streams, lakes and other water bodies are implemented.	Good implementation of plans observed, although field sites were somewhat limited during the scoping evaluation.	X			
4	Non-forested wetlands, including bogs, fens, vernal pools and marshes of significant size, are identified and protected.	ORV damage to wetlands was observed during scoping; staff concerns were discussed about damage to wetlands by illegal (off-trail) ORV use.			X	
5	Where regulations or BMPs do not currently exist to protect riparian areas, experts are involved in identifying appropriate protection measures.	NA, as regulations and BMPs do exist.	NA			

Old: Objective 3: Protect the water quality in streams, lakes and other waterbodies.

Old 4.1.3.1.1	<i>Program Participants shall meet or exceed Best Management Practices developed under Environmental Protection Agency (EPA)-approved state water quality programs and meet or exceed all applicable state water quality laws and regulations and the requirements of the federal Clean Water Act.</i>
Old 4.1.3.1.2	<i>Program Participant shall develop (where they do not currently exist), implement and document riparian protection measures based on soil type, terrain, vegetation and other applicable factors.</i>
Old 4.1.3.1.3	<i>Program Participants shall, individually, through cooperative efforts, or through AF&PA, provide funding for water quality research.</i>
Old 4.1.3.1.4	<i>Program Participants shall require BMP training for employees in forest management and wood procurement operations and shall encourage training for forest management and harvesting contractors.</i>

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Objective 4: Manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape- level measures that promote habitat diversity and the conservation of forest plants and animals including aquatic fauna.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
4.1	<i>Program participants shall have programs to promote biological diversity at stand- and landscape- scales.</i>	Planning at landscape level is not complete, although compartment-level planning does benefit greatly from existing larger-scale resource analyses that have been conducted. Biological diversity is an important factor in all decisions, and good processes exist, again at stand and compartment levels. Opportunities at landscape level may be missed.			2	
1	Program to promote the conservation of native biological diversity, including species, wildlife habitats, ecological or natural community types, and forest processes at the stand and landscape levels.	Long-standing involvement of wildlife and fisheries biologists in conservation at stand and species level. A good start has been made on landscape-scale planning (Lake Superior State Forest, Red Pine Plan) and for careful attention to forest processes (Mesic Conifer Guidelines, Red Pine Plan), but improvement is needed in planning at this scale. A process exists for identifying Biodiversity Management Areas (previously Potential Old Growth); to date 250,000 acres have been identified. OFI: Field staff require additional guidance on types of stands to nominate for Biodiversity Management Areas and management practices available once areas are designated.			X	X
2	Program to protect statutorily listed threatened and endangered species.	Generally excellent, but an OFI exists to provide more training and to involve field foresters in reconnaissance for T&E species during O.I.				X
3	Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities. Plans for protection may be developed independently or collaboratively, and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges or other conservation strategies.	Current Compartment Review Process (O.I.): Compartments are checked against Natural Heritage data during compartment planning, as per agreement with MNFI (Agreement for Natural Features Compartment Review of State Forest Management).	X			

4	Sets and implement criteria, as guided by regionally appropriate science for stand-level wildlife habitat elements to be retained (e.g., snags, mast trees, down woody debris, den trees, nest trees, etc.).	Prescriptions for each stand treated are developed with input from wildlife biologists. Biologists rely on O.I. to target their limited time, and the detail of non-timber information varies from unit to unit. Compartment review process always includes wildlife and fisheries biologists. Published criteria may exist as guidelines, but site-specific customization by trained personnel is a robust alternative, if it is consistently applied. Many sales have customized retention provisions, and all dead trees are retained in final harvests. This will be a focus area during the CA.	X			
5	Assess representation of cover types and habitats at the individual ownership level and, where data is available, across the landscape and incorporate findings from that assessment into planning and management activities.	A gap exists, because this work is in process but incomplete at large spatial scales. Examples include the Lake Superior State Forest planning efforts and the Red Pine Study. These assessments may be considered in compartment-level planning, but on an ad hoc basis. One example concerns the issue of the retention of white pine in aspen stands. Increasing the amount of pine is an overall goal, but only recently have foresters been able to consistently retain pine trees in aspen clearcuts. Targets at larger scales (some unit managers seek unit-level goals) would inform stand-level decision-making.			X	
6	Past or current support of and participation in plans or programs for conserving old-growth forests in the region of ownership.	Natural areas program has identified many areas of state forests for protections. The process for designating Biodiversity Conservation Areas is under revision, with a need to update and provide direction for management or protection. See Indicator 1 above.	X			
7	Participation in programs and implementation of steps as appropriate to limit the introduction, impact and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plant and animal communities.	Significant efforts have been made to limit the spread of invasive exotics, with many FTPs completed.	X			

Criteria		Auditor Notes	FC	EXR	Gap	OFI
4.2	<i>Program participants shall apply knowledge gained through research, science, technology and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.</i>	MI DNR has an excellent system to enable use of disciplinary expertise at the field level. Fisheries and wildlife biologists, botanists, ecologists, and others are on staff or available for training, consultation, and direct input in to planning and management decisions.	X			
1	Collection of information on critically imperiled and imperiled species and communities and other biodiversity-related data through forest inventory processes, mapping or participation in external programs such as NatureServe, state or provincial heritage programs or other credible systems. Such participation may include providing non-proprietary scientific information, time and assistance by staff, or in-kind or direct financial support	Compartments are checked against Natural Heritage data during compartment planning, as per agreement with MNFI.	X			
2	A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.	This methodology is centered on the availability of fisheries and wildlife biologists in all units, with specialists available and routinely involved in assessments and in management decisions.	X			

Old 4.1.4.1.1	<i>Program participants shall have policies to promote habitat diversity at stand- and landscape- levels.</i>
Old 4.1.4.1.2	<i>Program participants shall, individually, through cooperative efforts or through AF&PA, provide funding for research to improve the science and understanding of wildlife management at stand- or landscape- levels, ecosystem functions and the conservation of biological diversity. Research elements incorporated into new Objective 9.</i>
Old 4.1.4.1.3	<i>Program participants shall apply knowledge gained through research, science, technology and field experience to manage wildlife habitat and contribute to the conservation of biological diversity. Research elements incorporated into new Objective 9.</i>

Objective 5: Manage the visual impact of harvesting and other forest operations.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
5.1	<i>Program Participants shall manage the impact of harvesting on visual quality.</i>	MI DNR programs for visual management appear to be robust, resulting in excellent on-the-ground results.		X		
1	Program to address visual quality management.	Compartment review process, timber sale process, and Visual Management Checklists comprise a robust program.		X		
2	Incorporation of aesthetic considerations in harvesting, road, landing design and management and other management activities where visual impacts are a concern.	A variety of methods to manage the appearance of timber harvests were observed, including varying unit size and placement, screening harvests from high use roads, retention of individual or groups of trees, and attention to complete utilization.		X		

Criteria		Auditor Notes	FC	EXR	Gap	OFI
5.2	<i>Program Participants shall manage the size, shape and placement of clearcut harvests.</i>	The MI DNR program appears to meet the Performance Measure.	X			
1	Average size of clearcut harvest areas does not exceed 120 acres, except when necessary to respond to forest health emergencies or other natural catastrophes.	Current average estimated at 30 acres. Field observations confirmed that clearcut sizes are modest, except in Kirtland's Warbler Management Area.	X			
2	Documentation through internal records of clearcut size and the process for calculating the average size.	Vegetation management system tracks information on cuts and their size.	X			

Criteria		Auditor Notes	FC	EXR	Gap	OFI
5.3	<i>Program Participants shall adopt a “green-up” requirement or alternative methods that provide for visual quality.</i>	The O.I. and Compartment Review process, which includes a range of disciplinary expertise, provides for good visual quality.	X			
1	Program implementing the “green-up” requirement.	Compartment review process, timber sale process, and Visual Management Checklists comprise a robust program. Foresters review adjacent stands before prescribing regeneration treatments.	X			
2	Harvest area tracking system to demonstrate compliance with the “green-up” requirement.	Vegetation management system tracks information on cuts and their size.	X			
3	Trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut, or, as appropriate to address operational and economic considerations, an alternative method to reach the performance measure is utilized by the Program Participant.	Field observations confirmed that this requirement was met at all sites visited during scoping week.	X			

Criteria	
Old 4.1.5.1.1	<i>Program Participants shall have policies to manage the impact of harvesting on visual quality.</i>
Old 4.1.5.1.2	<i>Program Participants shall develop and adopt appropriate policies for managing the size, shape and placement of clearcut harvests.</i>
Old 4.1.5.1.3	<i>Program Participants shall adopt a green-up requirement or other, more comprehensive methods that provide age, habitat, and aesthetic diversity.</i>
Old 4.1.5.1.4	<i>Program Participants shall use harvest methods, age classes and judicious placement of harvest units to promote diversity across the forest landscape.</i>

Objective 6: Manage Program Participant lands of ecological, geologic, cultural or historic significance in a manner that recognizes their special qualities.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
6.1	<i>Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.</i>	The identification and management of special sites is a clear strength of the MI DNR program.		X		
1	Obtain existing natural heritage data and cooperate with those with expertise in identifying or selecting sites for protection of significant ecological, geologic, cultural or historic qualities.	Current Compartment Review Process (OI): Compartments are checked by the Bureau of History to see if any recorded archaeological sites exist within a compartment. Comments can be placed in the current OI (database) system reflecting the presence of an archaeological site. Similar process exists for the Natural Heritage data, as per agreement with MNFI agreement for Natural Features Compartment Review of State Forest Management (in FY 2004 for 2006 YOY for all RTE species); 250,000 acres of Potential Old Growth has been identified.		X		
2	Map, catalog, and manage existing sites appropriately.	2001 and 2002 Field Training Sessions: FMFA and Wildlife Staff received Archeology Training. Use of Web-Based Site Reporting Form (based on BOH Paper Form) allows DNR staff to easily report a site. Also have a Model of Prehistoric Site Potential.	X			

Objective 7: Promote the efficient use of forest resources.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
7.1	<i>Program Participants shall employ appropriate forest harvesting technology, “in woods” manufacturing processes and practices to minimize waste and ensure efficient utilization of trees harvested, where consistent with other SFIS objectives.</i>	Field observations confirmed excellent utilization practices at harvest sites visited.		X		
1	<p>1. Program or monitoring system to ensure efficient utilization which may include provisions to ensure, for example:</p> <ul style="list-style-type: none"> a. Landings left clean with little waste; b. Residues distributed to add organic and nutrient value to future forests; c. Training or incentives in place to encourage loggers to enhance utilization; d. Foresters work closely with mill managers for better utilization of species and low grade material; e. Harvested material merchandized to ensure use for its most beneficial purpose; f. Markets developed for underutilized species and low-grade wood; g. Periodic inspections and reports noting utilization and product separation; or h. Alternative markets sought to ensure better utilization (e.g., energy markets) 	<p>The timber sale program is designed to ensure proper utilization, including strong contract language, regular supervision, and lump-sum sales that provide incentives for loggers to maximize utilization. Markets are strong for most grades and species. Observations during scoping were somewhat limited, and more time will be devoted to this during the full certification. Our limited sample confirmed: a, b, c, g, and h. Audit team will inquire into d, e, and f during full audit to ensure that the full range of utilization efforts of the MI DNR are considered.</p> <p>See also PM 2.3, Indicator 4 (“Some units with good chip markets did not have much woody debris”).</p>		X		

SFIS Objectives for Procurement

Objective 8. Procurement programs broaden the practice of sustainable forestry. Note: This Objective does not apply to Michigan DNR

Criteria	
	<i>Procurement from sources within the United States and Canada (8.1 – 8.4 apply)</i>
8.1	Program Participants shall encourage landowners to reforest following harvest and to use Best Management Practices and to identify and protect important wildlife habitat elements, including critically imperiled and imperiled species and communities.
8.2	Program Participants shall encourage landowners to utilize the services of qualified resource professionals and qualified logging professionals in applying principles of sustainable forest management on their lands.
8.3	Program Participants shall clearly define and implement their own policies to ensure that mill inventories and procurement activities do not compromise adherence to the principles of Sustainable Forestry.
8.4	Program Participants shall monitor the effectiveness of efforts to promote reforestation and BMPs, using public, private, or both sources of information.
	<i>Procurement by manufacturing facilities enrolled in the SFI Program from sources outside the United States and Canada (8.5 and 8.6 apply)</i>
8.5	Program Participants shall ensure that their procurement programs support the principles of sustainable forestry including efforts to thwart illegal logging and promote conservation of biological diversity.
8.6	Program Participants shall encourage economically, environmentally and socially sound practices.

Old -Objective 8: Broaden the practice of sustainable forestry by cooperating with forest landowners, wood producers, consulting foresters and Program Participants employees who have responsibility in wood procurement and landowner assistance programs.

Criteria	
Old 4.2.1.1.1	<i>Program Participants shall encourage landowners to reforest following harvest and to use Best Management Practices.</i>
Old 4.2.1.1.2	<i>Program Participants shall work closely with state logging or forestry associations, or appropriate agencies and others in the forestry community, to foster improvement in the professionalism of wood producers.</i>
Old 4.2.1.1.3	<i>Program Participants shall annually report relevant information.</i>
Old 4.2.1.1.4	<i>Program Participants shall encourage landowners to utilize the services of qualified resource professionals and qualified logging professionals in applying principles of sustainable forest management on their lands.</i>
Old 4.2.1.1.5	<i>Program Participants shall ensure that their commitment to the SFIS Principles is communicated throughout their organization.</i>
Old 4.2.1.1.6	<i>Program Participants shall support and promote efforts by consulting foresters, state and federal agencies, state or local groups and programs like the American Tree Farm System, to educate and assist forest landowners, and to encourage them to apply principles of sustainable forest management.</i>
Old 4.2.1.1.7	<i>Program Participants shall clearly define and implement their own policies to ensure that mill inventories and procurement practices do not compromise adherence to the Principles of Sustainable Forestry.</i>
Old 4.2.1.1.8	<i>Procurement practices contribute to protection of legally designated conservation areas.</i>
Old 4.2.1.1.9	<i>Procurement policies promote conservation of biodiversity hotspots and major tropical wilderness areas.</i>

SFIS Objective for Forestry Research, Science and Technology (new)**Objective 9. Improve forestry research, science and technology upon which sound forest management decisions are based.**

Criteria		Auditor Notes	FC	EXR	Gap	OFI
9.1	<i>Program Participants shall (individually, through cooperative efforts or through associations) provide funding, in addition to that generated through taxes and other mandatory assessments, for forest research to improve the health, productivity and management of all forest resources.</i>	MI DNR has strong performance in funding and participating in research.		X		
1	Current financial or in-kind support of research to address questions of relevance to the region(s) in which the Program Participant's operations occur. The research will include some or all of the following issues: a. forest health, productivity and ecosystem functions, b. increased efficiency of chemicals, reduced chemical use rates, and application of Integrated Pest Management, c. water quality, d. wildlife management at stand-and or landscape-levels, e. the conservation of biological diversity, and f. the effectiveness of BMPs.	MI DNR research support appears to cover most of the listed issues, particularly a, c, d, and e. This research support is manifested in a number of ways, including funding for positions at Michigan State University (Perm research forester), support for university research such as Aspen-Larch coop, direct applied research on wildlife species, wildlife habitats, and resource use patterns, population modeling, and human dimensions, firefighting tools and equipment (Roscommon Equipment Center) and methods (Forest Fire Experiment Station); Habitat classification study; Michigan Tree Improvement Center;		X		
9.2	<i>9.2 Program Participants shall (individually, through cooperative efforts, or through associations) develop or use state, provincial or regional analyses in support of their sustainable forestry programs.</i>	MI DNR leads or participates in a number of state or regional initiatives that tie closely to the department's sustainable forestry program. This is expected to be a clear strength of the program.	X			
1	Participation, individually or through cooperative efforts or associations at the state, provincial or regional level, in the development or use of: a. regeneration assessments; b. growth-and-drain assessments; c. BMP implementation and compliance; and d. biodiversity conservation information for family forest owners.	Examples include a variety of outreach efforts through the service forestry program, the Red Pine Study, BBD Monitoring and Impact Analysis Plot Network; Wildlife Recovery Plans, Fisheries Basin Plans, and past BMP implementation/compliance studies, although none have been completed recently	X			

SFIS Objective for Training and Education (new)**Objective 10. Improve the practice of sustainable forest management by resource professionals, logging professionals, and contractors through appropriate training and education programs.**

Criteria		Auditor Notes	FC	EXR	Gap	OFI
10.1	<i>Program Participants shall require appropriate training of personnel and contractors so that they are competent to perform their responsibilities under the SFI Objectives and Performance Measures.</i>	Although there is significant evidence of conformance, gaps exist in all four indicators relating to training. Training requirements follow a “management system” approach (inform, determine job requirements, train, track, adjust as necessary).			4	
1	Written statement of commitment to the SFIS is communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff and field foresters.	A commitment to certification was made by Michigan’s 92nd Legislature in 2004 - Part 525: Sustainable Forestry on State Forestlands, Sect 52506 “The department shall seek and maintain third-party certification ... of at least 1 credible nonprofit, nongovernmental certification program...”. At the appropriate time a “statement of commitment to the SFIS” must be “communicated throughout the organization”			X	
2	Staff roles and responsibilities for achieving SFIS Objectives are assigned and fully understood.	Forest Certification Team charged with training, among other duties, is functioning within FMFU. Reviewed PPT “An Introduction to Michigan DNR Forest Certification Initiative”; was dev. & used in certification training designed for all staff of FMFM Division; most staff have received this training. Confirmed training records for staff in attendance at 18 locations (generally at Unit or District level). GAP: responsibilities for SFIS Objectives not explicitly assigned.			X	
3	Staff maintain education and training sufficient to their roles and responsibilities.	There are some problems with records for employees. Fire Officers- 6 week training was mentioned. 3 levels- entry, advanced, fire officer supervisor. Training for BMPs (1998: all Division foresters, technicians and forest fire officers) and Riparian Management (2004, all Division foresters) should meet most needs. Training in RTE/Heritage not widespread. GAP: All staff should have training and educations appropriate to their SFI responsibilities. A method is needed to identify appropriate training for each job classification and to ensure that training is up-to-date.			X	
4	Program Participants require contractors maintain education and training sufficient to their roles and responsibilities under the SFIS.	There is no procedure for tracking training of contractors, nor to define the level of training deemed “sufficient to their roles and responsibilities...”			X	

FC=Indicators in place, conformance likely based on sample reviewed EXR=Exceeds Requirements Gap=Gap in program/evidence OFI=Opportunity for Improvement

Criteria		Auditor Notes	FC	EXR	Gap	OFI
10.2	<i>Program Participants shall work closely with state logging or forestry associations, or appropriate agencies and others in the forestry community, to foster improvement in the professionalism of wood producers.</i>	Although the MI DNR may be involved in logger training independently, there is a gap in working with the SFI SIC in this area.			1	
1	Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer training courses that include: a) awareness of sustainable forestry principles and the SFI program; b) Best Management Practices, including road construction, maintenance, and retirement, and streamside management; c) regeneration, forest resource conservation and aesthetics; d) awareness of responsibilities under the Endangered Species Act and other measures to protect wildlife habitat. e) logging safety; f) occupational Safety and Health Administration (OSHA) and wage and hour rules; g) transportation issues; h) business management; i) public policy and outreach.	DNR staff have begun to become involved in MI's SIC committee. MI DNR must demonstrate involvement in all appropriate activities of the Michigan SIC at a level commensurate with the size of its program.			X	

SFIS Objective for Legal and Regulatory Compliance (New)**Objective 11. Commitment to comply with applicable federal, provincial, state or local forestry and related environmental laws and regulations.**

Criteria		Auditor Notes	FC	EXR	Gap	OFI
11.1	<i>Program Participants shall take appropriate steps to comply with all applicable federal, provincial, state or local forestry and related environmental laws and regulations.</i>	Although limited time was devoted to this issue during the week-long scoping, it appears that MI DNR meets this requirement.	X			
1	Access to relevant laws and regulations in appropriate locations.	Copies of manuals of laws and regulations were available at field offices visited.	X			
2	System to achieve compliance with applicable federal, provincial, state or local laws and regulations	Regular training for staff, compartment review and timbersale review processes, and stated willingness to consult with MI DEQ (water regulators) comprise a system.	X			
4	Available regulatory action information demonstrates a commitment to legal compliance.	No time was available for independent confirmation of this indicator, but information supplied by MI DNR suggests that confirming this commitment should be relatively easy to accomplish during the full review.	X			
5	All applicable federal, and state and provincial regulations and international protocols followed for research and deployment of trees derived from genetic tree improvement and biotechnology.	NA	NA			

SFIS Objective for Public and Landowner Involvement in the Practice of Sustainable Forestry. (New)

[Note: Text from Objectives 8, 9 and 10 were combined and edited to develop this new Objective 12.]

Objective 12. Broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment to sustainable forestry, and publicly report progress.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
12.1	<i>Program Participants shall support and promote efforts by consulting foresters, state and federal agencies, state or local groups, professional societies, and programs like the American Tree Farm System®, to educate and assist forest landowners, and to encourage them to apply principles of sustainable forest management.</i>	Education and assistance to forest landowners appears to be a clear strength of the MI DNR program. Once the SIC gap is closed a finding of “Exceeds the Standard” is likely.			1	
1	Support for efforts of SFI Program Implementation Committees.	DNR staff have begun to become involved in MI’s SIC committee. MI DNR must demonstrate involvement in all appropriate activities of the Michigan SIC at a level commensurate with the size of its program.			X	
4	Support for the development and distribution of educational materials, including information packets for use with forest landowners.	Service forestry program of MI DNR	X			
5	Support for the development and distribution of regional or statewide information materials that provide landowners with practical approaches (i.e. fact sheets) for considering biodiversity issues such as specific wildlife habitat, critically imperiled, imperiled, threatened, and endangered species.	Service forestry program of MI DNR Stewardship program	X			
6	Participate in efforts to support or promote conservation of working forests through voluntary market-based incentive programs (e.g., current use taxation programs, Forest Legacy, or conservation easements).	Support Tax reduction law; participation in the federal Forest Legacy Program.	X			
7	Program participants are knowledgeable about regional conservation planning and priority setting efforts that include a broad range of stakeholders and consider the results of these efforts in planning and management activities.	Eco-regional planning just getting started (see Gap under PM 4.1, 5). Foresters and planners consider other available regional assessments (e.g. the AuSable River Watershed Assessment ; Kirtland’s Warbler Recovery Plan) in developing prescriptions and designing compartment plans. In terms of this Objective, MI DNR leadership or involvement in assessments, which typically include a broad range of stakeholders, appear sufficient to meet the indicator.	X			

FC=Indicators in place, conformance likely based on sample reviewed EXR=Exceeds Requirements Gap=Gap in program/evidence OFI=Opportunity for Improvement

Criteria		Auditor Notes	FC	EXR	Gap	OFI
12.2	<i>Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to forest management.</i>	Although a Gap exists (SIC involvement) overall the program has clear strengths in outreach and public involvement.		X	1	
1	Support for the SFI Implementation Committee program to address outreach, education & technical assistance (e.g., 800 numbers, environmental public sector technical assistance programs).	DNR staff have begun to become involved in MI's SIC committee. MI DNR must demonstrate involvement in all appropriate activities of the Michigan SIC at a level commensurate with the size of its program.			X	
2	Provide periodic educational opportunities promoting sustainable forestry such as: a. Conducting field tours, seminars or workshops; b. Conducting educational trips; c. Providing self-guided forest management trails; d. Publishing articles, educational pamphlets or newsletters; and e. Supporting state, provincial and local forestry organization and soil & water conservation districts	Service forestry program 100% of service forestry program comes from S.F. timbersales receipts. 4 specialists, 3 analysts, 7 central office staff.		X		
3	Provide recreation opportunities to the public, where consistent with forest management objectives.	Includes an extensive array of recreation opportunities, including various trails, campgrounds, and water access. Includes: ORV, snowmobile, hiking, water access, rails to trails. It comprises the largest public land base for dispersed recreation east of the Mississippi River. Significant efforts are made to provide areas accessible to handicapped users (ADA guidelines are being used for all sites being upgraded).		X		

Criteria		Auditor Notes	FC	EXR	Gap	OFI
12.3	<i>Program Participants shall encourage economically, environmentally and socially sound practices.</i>	NA – US operations only	NA			
1	Process to assess whether Program Participants' activities take place in countries where laws addressing the following interests are in place, are enforced, and include independent legal processes to resolve disputes, as reported by a credible institution recognized by the Sustainable Forestry Board: a. Worker Health & Safety; b. Fair Labor Practices c. Indigenous Peoples Rights; d. Anti-Discrimination and Anti-Harassment Measures; e. Wage and Hour Regulations	NA				

FC=Indicators in place, conformance likely based on sample reviewed EXR=Exceeds Requirements Gap=Gap in program/evidence OFI=Opportunity for Improvement

2	Programs to support and promote protection of employee and community interests, if assessment of country in which Program Participant is operating shows they are not adequately addressed by law.					
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Criteria		Auditor Notes	FC	EXR	Gap	OFI
12.4	<i>Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, the public or Program Participants regarding practices that appear to be inconsistent with the SFIS Principles and Objectives.</i>	MI DNR personnel have a strong commitment to public service, including responding to public concerns. Gaps exist for support for the SIC efforts, and for MI DNR-specific efforts, involving complaints about forestry practices.			2	
1	Support for SFI Implementation Committee efforts (800 numbers and other efforts) to address concerns raised by loggers, consulting foresters, employees, Program Participants and the public.	DNR staff have begun to become involved in MI's SIC committee. MI DNR must demonstrate involvement in all appropriate activities of the Michigan SIC at a level commensurate with the size of its program.			X	
2	Process established to receive and respond to public inquiries.	Ad hoc process was described by some unit managers. There appears to be no central clearinghouse for complaints about forest practices			X	

12.5	<i>Program Participants shall report annually to the SFI program on their compliance with the SFIS.</i>	These are technical gaps, as the MI DNR has yet to receive the annual survey.			2	
1	Record keeping tracks all the categories of information needed for annual progress reports.	T.S. program Veg. Mgmt system planting/regeneration FTB database	X			
2	Prompt response to the annual SFI survey questionnaire.	MI DNR has yet to receive a survey.			X	
3	Copies of past reports maintained to document progress and improvements to demonstrate conformance to the SFIS.	MI DNR has yet to receive a survey.			X	

Criteria		Auditor Notes	FC	EXR	Gap	OFI
12.6	<i>Program Participants with management activities on public lands shall participate in the development and support of public land planning and management processes.</i>	MI DNR, as the public land agency, is responsible for state land planning and management. The department participates, by way of providing comments, in federal land planning.	X			
1	Involvement in public land planning and management activities with appropriate governmental entities and the public.	Collaborative, FWS, USFS, NPS, FIA	X			
2	Contact with local stakeholders over forest management issues through State, Provincial, Federal, or independent collaboration.	Open House and Compartment Review programs at each unit comprise a robust system for enabling contact with local stakeholders. Unit managers interviewed confirmed active and regular efforts to maintain communications with key stakeholders.	X			
12.7	<i>Program Participants with management activities on public land shall recognize that the involvement of affected indigenous peoples in forest management is appropriate.</i>	MI DNR appears to be paying appropriate attention to the involvement of indigenous peoples, and their rights and traditions of forest use.	X			
1	A program in place that includes dialogue with affected indigenous peoples, to: a. understand and respect Traditional Forest Related Knowledge as proprietary information b. identify and protect sites of cultural, spiritual or historical significance c. address the sustainable use of non-timber forest products of value to indigenous peoples.	A. Locked Comments in OI (database with access control); Jim Ekdahl, DNR Upper Peninsula Field Deputy is the department's statewide coordinator for tribal affairs. DNR devotes significant resources to tribal relationships, including use of historic researchers (contract), dedicated staff attorneys, and representative from all key agencies B. Michigan Natural features Inventory (MNFI) and History and Arts Libraries (HAL, the MI version of s.h.p.o.) are provided information on all proposed treatments. C. Tribal members who wish to gather medicinal plants need a permit, Conservation Officers are trained in protocols; officers write reports on incidents, which are resolved at higher levels by most experienced personnel.	X			
2	A program demonstrating the respectful treatment of the legal rights of forest dependent indigenous peoples.	NA- indigenous people not forest dependent. MI DNR has a strong program of paying careful attention to all tribal rights.	X			

FC=Indicators in place, conformance likely based on sample reviewed EXR=Exceeds Requirements Gap=Gap in program/evidence OFI=Opportunity for Improvement

Old Objective 9: Publicly report Program Participants progress in fulfilling their commitment to sustainable forestry.

Criteria	
4.3.1.1.1	<i>Program Participants</i> shall report annually to the SFI program on their compliance with the SFIS.

Old Objective 10: Provide opportunities for the public and the forestry community to participate in the commitment to sustainable forestry.

Criteria	
4.3.2.1.1	<i>Program Participants</i> shall support and promote, at the state or other appropriate levels, mechanisms for public outreach, education and involvement related to forest management.
4.3.2.1.2	<i>Program Participants</i> shall establish, at the state, or other appropriate levels, procedures to address concerns raised by loggers, consulting <i>foresters, employees, the public or Program Participants</i> regarding practices that appear to be inconsistent with the SFIS <i>Principles</i> and Objectives.

SFIS Objective for Management Review and Continual Improvement

Objective 13. Promote continual improvement in the practice of sustainable forestry and monitor, measure and report performance in achieving the commitment to sustainable forestry.

Criteria		Auditor Notes	FC	EXR	Gap	OFI
13.	<i>Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard program and policies, to make appropriate improvements in programs policies, and to inform their employees of changes.</i>	Many aspects of this Performance Measure are in place, but do not fully meet the overall requirements. Evidence of a functioning system might include: a written description of the system that includes all required elements; minutes of management review meetings; or changes in the system that followed logically from information gathered and reviewed.			3	
1	A system to review commitments, programs policies and procedures to evaluate effectiveness.	Aspects of a review system currently exist. For example, Forest Operations Reviews involve people from different units who check other units. Past inventory and T.S.			X	
2	A system for collecting, reviewing and reporting information to management regarding progress in achieving SFI Objectives and Performance Measures.	Certification Implementation team efforts fall under this indicator. The management reporting system for SFI issues (subset of above) is not yet complete. SFI-specific performance information is to be “collect(ed), review(ed), and report(ed)”.			X	
3	Management annually reviews progress and determines changes and improvements necessary to continually improve their achieving SFI conformance.	Formal senior management review is required annually to review information collected under Indicators 1 and 2 above, and to make necessary changes and improvements. Response to this Gap Analysis report can comprise a portion of this management review.			X	

Old Objective 11: Promote continual improvement in the practice of sustainable forestry and monitor, measure and report performance in achieving the commitment to sustainable forestry.

Criteria	
4.4.4.1.1	<i>Program Participants shall establish a management review system to examine findings and progress in implementing the SFI program and policies, to make appropriate improvements in policies, and to inform their employees of changes.</i>
CI 1	A system to review commitments, <i>policies</i> and procedures to evaluate effectiveness.
CI 2	A system for collecting, reviewing and reporting information to senior management regarding progress in achieving SFI <i>Objectives</i> and <i>Performance Measures</i> .
CI 3	Senior management annually reviews progress and determines what changes and improvements are necessary to continue achieving SFI conformance.