



**FSC Certification Report for the
2010 Annual Audit of:
State of Indiana DNR - Division of Forestry
Classified Forest & Wildlands Program**

Certificate Number: SCS-FM/COC-00123G

**Under the
SCS Forest Conservation Program
(An FSC-Accredited Certification Program)**

**Date of Field Audit: September 20-23, 25, 2010
Date of Report: January 31, 2011**

**Scientific Certification Systems
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Section 2.0 (Surveillance Decision and Public Record) will be made publicly available on the SCS website (www.scscertified.com) no later than 60 days after the report is finalized.

1.0 GENERAL INFORMATION

1.1 CONTACT INFORMATION

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1.2 General Background

This report covers the first annual audit of Indiana Classified Forest & Wildlands group certification program pursuant to the FSC guidelines for annual audits as well as the terms of the forest management certificate awarded by Scientific Certification Systems in March 2009 (SCS-FM/COC -00123G). All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing compliance with the requirements and standards of certification. A public summary of the initial evaluation is available on the SCS website www.scscertified.com.

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

- A focused assessment of the status of any outstanding conditions or corrective action requests
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior audit
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

At the time of the September 2010 annual audit, there were 15 open Corrective Action Requests, the status of the Division of Forestry's (DoF) response to which was a major focus of the annual audit (see discussion, below for a listing of those CARs and their disposition as a result of this annual audit).

1.3 Guidelines/Standards Employed

For this annual audit, the SCS auditor evaluated the extent of conformance with the new FSC-Forest Management Standard (v1.0). The Classified Forest & Wildlands Program (CF) was originally certified to the FSC's Lake States-Central Hardwood Regional Standards.

2.0 SURVEILLANCE DECISION AND PUBLIC RECORD

2.1 Assessment Dates

The audit was conducted over a 5-day period that included September 20-23 and 25. The overall audit included 5 person-days of site visits, 1 day of audit preparation, and 1 day of document review and report preparation, for a total of 7 person-days.

2.2 Assessment Personnel

The audit was conducted by Michael Thompson, who also conducted the initial evaluation of the CF group.

Michael Thompson, Team Leader: Mr. Thompson is a Certified Wildlife Biologist with extensive experience in forest management and the conservation of rare plants and animals and natural communities. He was a member of the FSC's Northeast Standards Working Group and has conducted FSC audits in Maine, Maryland, West Virginia, Pennsylvania, Massachusetts, Connecticut, Idaho, Indiana, Tennessee, Ontario, and New Brunswick.

2.3 Assessment Process

The CF group is comprised of SLIMF properties and the sample size of sites to visit was determined by SCS based on the SLIMF sampling requirements. The DoF provided a list of all group-member properties, highlighting those with recent management activities, and the auditor selected a random sample of properties based on type of activity (e.g., harvesting, TSI) and District. In part, the site selection was based on the premise that all Districts will be visited before the first 5-year re-evaluation of the certificate.

Wednesday, October 20, 2010

OPENING MEETING at Owen-Putnam State Forest, 12:00 Noon

DoF Participants: Seifert, Wagner, Huter, Unversaw, Royer

Site Visit Tracts:

- No. 1 - 60-145 Unversaw (Forester)
- No. 2 - 60-154 Unversaw (Forester)
- No. 3 - 67-122 Royer (Forester)

Thursday, October 21, 2010

DoF Participants: Seifert, Wagner, Huter, Royer

Site Visit Tracts:

- No. 4 - 67-38 Royer (Forester)
- No. 5 - 61-129 Royer (Forester)
- No. 6 - 61-61 Royer (Forester)
- No. 7 - 61-58 Royer (Forester)
- No. 8 - 61-51 Royer (Forester)
- No. 9 - 61-258 Royer (Forester)

Friday, October 22, 2010

DoF Participants: Seifert, Wagner, Huter, Lemmons

Site Visit Tracts:

- No. 10 - 84-5 Lemmons (Forester)
- No. 11 - 84-10 Lemmons (Forester)
- No. 12 - 77-173 Lemmons (Forester)
- No. 13 - 28-299 Lemmons (Forester)
- No. 14 - 28-23 Lemmons (Forester)
- No. 15 - 28-313 Lemmons (Forester)

Saturday, October 23, 2010

DoF Participants: Wagner, Huter, McGriff (morning), Ratts (afternoon)

Site Visit Tracts:

- No. 16 - 40-138 McGriff (Forester)
- No. 17 - 40-273 McGriff (Forester)
- No. 18 - 40-154 McGriff (Forester)
- No. 19 - Bohall Ratts (Forester)
- No. 20 - 7-16 Ratts (Forester)

Monday, October 25, 2010

DoF Participants: Seifert, Wagner, Huter, Ratts

Site Visit Tracts:

- No. 21 - 71-104 Ratts (Forester)
- No. 22 - 55-42 Ratts (Forester)
- No. 23 - 55-32 Ratts (Forester)

CLOSING MEETING

2.4 Status of Corrective Action Requests

<p>Nonconformity: FSC Criterion 1.1, specifically Indicator 1.1.a, requires that forest management shall respect all national and local laws and administrative requirements. This requirement extends to forest operations and includes activities performed by loggers, log truck drivers, and other forest workers. Federal regulations (OSHA 1910.266(a)(d)(1)), as well as the ILO Guidelines for Safety and Health in Forestry Work (see FSC Criterion 1.3), require that loggers wear certain personal protective equipment (PPE) while harvesting trees. Loggers were observed, however, felling trees without all the necessary PPE and District Foresters indicated that this was not a unique occurrence.</p>	
<p>Minor CAR 2009.1</p>	<p>The Division of Forestry must: 1) develop a program for ensuring that personnel involved with harvest operations on certified Classified Forest Program properties wear the appropriate PPE for their assigned task; 2) provide evidence that input from representatives of the logging industry were consulted during program development; and 3) document that the program is being implemented.</p>
<p>Deadline</p>	<p>By the first annual audit</p>
<p>Reference</p>	<p>FSC Indicator 1.1.a</p>
<p>DoF Response</p>	<p>Item 1) Landowners have always been encouraged to include safety requirements in their timber contract, and this recommendation has been reinforced with landowners since certification. The DoF has also developed a system by which District Foresters hold a pre-harvest conference with the landowner, logger, and forester. During the pre-harvest conference, safety requirements - including the use of PPE - is reinforced. During the harvest, District Foresters make periodic visits and makes observations regarding the use of PPE and other safety practices. These observations are recorded on a field visit form, and a copy of the form is given to the landowner and the logging supervisor. If individual companies routinely disregard safety regulations, the DoF will meet them to resolve such issues.</p> <p>Item 2) The DoF attended a series of meetings in 2010 that included loggers, consulting foresters, timber buyers, the Indiana Forest Industry Council, and the Indiana Society of American Foresters. During these meetings, the DoF reinforced the requirements that are associated with certification, including the need to follow safety regulations. These meetings provided an opportunity for representatives from the logging industry to comment on safety-related protocols.</p> <p>Item 3) Pre-harvest meetings and site visits are all documented on field forms and a sample of such forms was provided as part of the 2010 audit, documenting the implementation of the safety program.</p>
<p>Auditor's Comments</p>	<p>The 2010 surveillance audit provided an opportunity to meet with DoF District Foresters, timber buyers, and loggers to discuss the safety program. These interviews confirmed that the DoF's safety policies were being conveyed to the logging community, that they had been given an opportunity to provide input, and that the program was being employed in the field. An inspection of the pre-harvest form and the site visit checklist</p>

	on a sample of sites confirmed that safety protocols were being addressed.
Status	CLOSED

Nonconformity: FSC Criterion 1.1, specifically Indicator 1.1.b, requires that forest management operations follow available best management practices (BMPs). Evidence of BMP non-compliance, however, was observed on several of the sites visited by the audit team and included such things as missing waterbars, incorrectly installed waterbars, and skidding logs in creeks. Some BMP non-compliance is detected during the Division's 5-year inspection process, but this system alone is not timely enough to ensure compliance with FSC Indicator 1.1.b.	
Minor CAR 2009.2	The Division of Forestry must: 1) develop a monitoring and enforcement program for ensuring that harvest operations on Classified Forest Program properties follow applicable BMPs, 2) demonstrate that appropriate Division of Forestry staff have been trained in program implementation, and 3) document that the program is being implemented.
Deadline	By the first annual audit
Reference	FSC Indicator 1.1.b
DoF Response	Item 1) Landowners are reminded to include BMPs in their timber contract. BMPs are also discussed during the pre-harvest conference, a process developed specifically for certification. District Foresters also now visit active harvest operations and document any observations related to BMPs on a field form that is given to the landowner and the harvest supervisor. In addition to forester site visits, the DoF conducts a full BMP audit on a 10% sample of timber harvests and reports on the results. If there are trends with individual companies not following BMPs, then the DoF will develop a remedial action plan for addressing such issues. Item 2) Two training sessions specific to BMPs have been held with District Foresters since the initiation of certification activities. District Foresters also help with the 10% full BMP audit and receive additional training as part of this effort. Item 3) Implementation of the program is documented on pre-harvest conference and site visit field forms. Reports are also issued for the 10% full BMP audit.
Auditor's Comments	The 2010 surveillance audit provided an opportunity to meet with DoF District Foresters, timber buyers, and loggers to discuss the BMP program. These interviews confirmed that the DoF's BMP policies were being conveyed to landowners and the logging community and that the program was being employed in the field. An inspection of the pre-harvest form and the site visit checklist on a sample of sites confirmed that BMP protocols were being addressed. As part of the audit, the full BMP audit program (i.e., the 10% sample) was discussed and the report of results was reviewed.
Status	CLOSED

Nonconformity: FSC Criterion 1.1, specifically Indicator 1.1.c, requires that forest management plans and operations meet or exceed all applicable laws and administrative requirements with respect to sharing public information, opening records to the public, and following procedures

<p>for public participation. It is not clear, however, how the Division of Forestry forming an FSC group of private landowners relates to this indicator. Is the Division, for example, required by State law or regulation to undergo a public participation process to organize and manage an FSC group? Some stakeholders, including landowners, have also asked if membership in the FSC group will entail any requirements for them to publicly share any management information beyond what is required by current Classified Forest Program regulations.</p>	
<p>Minor CAR 2009.3</p>	<p>The Division of Forestry must: 1) determine if Indiana laws or regulations require a public participation process to form an FSC group certification system based on the Classified Forest Program; 2) if such laws or regulations exist, develop a program for addressing applicable requirements; 3) document the implementation of such a program, if warranted, and 4) provide information to potential group members regarding the public information requirements, if any, associated with group membership.</p>
<p>Deadline</p>	<p>By the first annual audit</p>
<p>Reference</p>	<p>FSC Indicator 1.1.c</p>
<p>DoF Response</p>	<p>Item 1) The Indiana Office of Legal Counsel reviewed applicable regulations and concluded that there are no laws or regulations that require a public participation process to form an FSC group certification system. Item 2) Not applicable (see Item 1) Item 3) Not applicable (see Item 1) Item 4) The DoF has held a series of public meetings for landowners regarding the group and sends periodic mailings, as well, that address public information requirements. The Indiana Office of Legal Counsel also determined that the FSC group does not pose any new public information requirements for landowners.</p>
<p>Auditor's Comments</p>	<p>The response is acceptable and the written response from the Indiana Office of Legal Counsel documents that there are no laws or regulations that require a public participation process to form an FSC group. Meeting agendas and mailing to landowners confirm that the DoF is informing group members about public information requirements associated with group membership.</p>
<p>Status</p>	<p>CLOSED</p>

Nonconformity: FSC Indicator 5.1.c requires that investment and/or reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity. Many landowners don't appear to invest in timber stand improvement (TSI), even when recommended in the management plan. In addition, management objectives tend to be vague in many management plans.

As group managers, the Division of Forestry will need to reinvest in the forest by motivating the landowner to reinvest in things like TSI. We recognize that many District Foresters attempt to do this, but find it difficult to accomplish. The Division of Forestry will have to revitalize its efforts to motivate landowners to follow through on management plan recommendations through additional training and potentially financial incentives. The Division of Forestry may also need to hire more staff to implement FSC group management requirements.

To ensure compliance with this indicator, the Division of Forestry will have to take steps to ensure that adequate investment in the forest is made and directed toward reaching the desired future condition of forest.	
Minor CAR 2009.4	The Division of Forestry must: 1) develop a program for defining and monitoring adequate investment and/or reinvestment in the forest at both the group level (e.g., the Division of Forestry's investment in staff and other resources) and parcel levels (i.e., evaluate incentives for landowners).
Deadline	By the first annual audit
Reference	FSC Indicator 5.1.c
DoF Response	The DoF monitors investment and reinvestment in the forest at the group level through its internal budgeting process, monitoring Central Office staff spend overseeing the management of the FSC group, monitoring landowner activities through annual reporting, and monitoring District Forester activities that relate to FSC group member properties. At the parcel level, District Foresters now visit properties during harvest operations, as well as during the 5-year inspection process. The DoF has also updated its management plan template and reinforced the concept of a desired future condition for the forest. As part of their site visits, District Foresters monitor progress toward achieving the desired future condition through implementation of management recommendations.
Auditor's Comments	As part of the 2010 surveillance audit, the DoF provided evidence of the person hours spent managing the FSC group and conducting specific activities on group member properties. The DoF also produced reports indicating that a significant number of group members are actively managing their lands on an annual basis. In addition, the DoF provided summaries of the financial incentive programs that are available to group members and the efforts that have been made to encourage landowners to take advantage of these funds. The program that has been designed for monitoring investment in the forest is acceptable at both the group and parcel levels.
Status	CLOSED

Nonconformity: FSC Indicator 6.1.a requires that using credible scientific analyses and local expertise, an assessment of current conditions is completed to include: disturbance regimes and successional pathways; unique, vulnerable, rare, and threatened communities; common plants, animals, and their habitats; sensitive, threatened, and endangered species and their habitats; water resources; and soil resources. FSC Indicator 6.1.b requires that using available science and local expertise, the current ecological conditions are compared to both the historical conditions and desired future conditions within the landscape context. This comparison is done by employing the baseline factors identified in 6.1.a.

Parcel level management plans typically contain very general descriptions of current conditions, although notable exceptions were observed. The team concludes that more attention needs to be paid to how current conditions will be assessed and described in management plans, appropriate to the scale and intensity of operations. We note that the revised draft management plan template shows progress toward this goal and takes further steps toward linking current forest conditions

with management recommendations to achieve desired future conditions. The Division of Forestry will have to ensure that all District Foresters receive the proper training to ensure consistency among management plans. Major CAR 2008.6, now closed, was written in response to a material failure to comply with Criterion 6.1. Minor CAR 2009.5 was, instead, issued in response to a perceived need to improve current practices related to Indicators 6.1.a and 6.1.b.	
Minor CAR 2009.5	The Division of Forestry must: 1) develop an approach to characterizing current and historic forest conditions at the landscape level (i.e., regional and/or state-wide) that can be applied to the group as a whole; 2) develop standardized protocols for describing current conditions and comparing them to historic conditions as management plans are prepared or updated; 3) demonstrate that District Foresters have been trained in the application of such protocols; and 4) develop and implement a quality assurance program to ensure that management plans conform to the protocols.
Deadline	By the first annual audit (CLOSED)
Reference	FSC Indicator 6.1.a and 6.1.b
DOF Response	Item 1) The Division of Forestry prepared a description of current and historic forest conditions at the landscape level in the Umbrella Management Plan for its FSC group; Item 2) The Division of Forestry finalized an updated template for new and updated management plans that includes standard protocols for describing current and historic forest conditions; Item 3) The updated management plan template has been provided to District Foresters and expectations for its use have been covered in Division meetings and in one-on-one meetings between District Foresters and supervisory staff; Item 4) The Division of Forestry has developed protocols for reviewing draft management plans developed under the new template.
Auditor's Comments	The updated draft management plan template was available during the initial audit in 2008. Following that audit, the template was finalized and distributed to District Foresters. During the November 2009 follow-up audit, District Foresters indicated that they had been trained in the use of the template and example current management plans were provided for inspection.
Status	CLOSED PRIOR TO THE 2010 AUDIT

Nonconformity: FSC Indicator 6.1.c requires that prior to the commencement of management activities potential short-term environmental impacts and their cumulative effects are evaluated. FSC Indicator 6.1.d requires that using assessments derived from 6.1.c, management options are developed and implemented to achieve the long-term desired future conditions and ecological functions of the forest. Based on our site visits, our conclusion is that pre-harvest environmental impacts are addressed on a cursory basis by consulting or industry foresters, when used on a job, or (more commonly) by the logging contractor. As group managers, the Division of Forestry will have to develop a process for ensuring that short-term environmental impacts are addressed and mitigated where possible prior to harvest operations. Major CAR 2008.6, now closed, was written in response to a material failure to comply with Criterion 6.1. Minor CAR 2009.6 was, instead, issued in response to a perceived need to improve current practices related to Indicators 6.1.c and 6.1.d.

Minor CAR 2009.6	The Division of Forestry must: 1) develop a process for ensuring that short-term environmental impacts are evaluated prior to harvest operations and that management options are developed and implemented to achieve desired long-term future conditions; 2) develop and implement any necessary training programs for appropriate forest workers; and 3) demonstrate that the process is being implemented.
Deadline	By the first annual audit (CLOSED)
Reference	FSC Indicator 6.1.c and 6.1.d
DOF Response	Item 1) The Division of Forestry's process for evaluating short-term environmental impacts is described in Major CAR 2008.6; methods for addressing long-term future condition of the forest are addressed in Minor CAR 2009.5; Item 2) District Foresters have received training in implementation of updated protocols related to environmental impact assessment and management plan preparation; as noted in Major CAR 2008.6, District Foresters will also hold pre-harvest meetings with logging contractors and industry/consulting foresters, during which time these professionals will receive training related to avoiding environmental impacts and management plan implementation; Item 3) Evidence that the new protocols were being implemented was provided during the November 2009 follow-up audit.
Auditor's Comments	The Division of Forestry's protocols for addressing short-term environmental impacts is based on improved management plans, increased consistency in management plans, renewed emphasis on BMPs, training, and having District Foresters involved with harvest planning and execution via the pre-harvest conference, at least one site visit during harvest operations, and a post-harvest inspection.
Status	CLOSED PRIOR TO THE 2010 AUDIT

Nonconformity: FSC Indicator 6.2.b requires that if scientific data indicate the likely presence of state and/or Federally listed as threatened, endangered, or special concern, or sensitive populations, either new surveys are carried out before field management activities begin or the forest owner or manager assumes their presence and makes appropriate modifications in forest management. As previously noted, the Division of Forestry had no involvement in harvest operations at the time of the initial audit, so it couldn't assure compliance with this indicator at the time.	
Minor CAR 2009.7	The Division of Forestry must develop a process for ensuring that landowners and forest workers are made aware of the presence of state and/or Federally listed as threatened, endangered, or special concern species, or sensitive populations, when they occur, prior to harvest operations.
Deadline	By the first annual audit
Reference	FSC Indicator 6.2.b
DoF Response	When management plans are updated, a review of the Natural Heritage database is conducted. If RTE or special concern species or their habitats are identified, the information is shared with the landowner and added to the management plan. The decision to harvest timber triggers another

	review of the Natural Heritage database and any new information is brought to the attention of the landowner. At the pre-harvest conference, RTE and special concern species or their habitats are discussed with the landowner and the logging contractor and appropriate conservation measures are discussed. During the harvest, District Foresters visit the operation to ensure that requirements are being followed.
Auditor's Comments	The DoF's response is acceptable and the 2010 surveillance audit provided evidence that the system was being employed in the field prior to harvest operations.
Status	CLOSED

Nonconformity: FSC Indicator 6.2.d states that "Where they have been identified, state and/or Federally listed as threatened, endangered, of special concern, or sensitive species and their habitats are maintained and/or restored. Multiple-use management activities are acceptable, where the law allows, in these species' habitat areas to the extent that they are compatible with maintenance and restoration of the species." As the Division of Forestry currently lacks a process for making landowners and forest workers aware of the presence of state and/or federally listed RTE species as per Minor CAR 2009.7, it cannot verify whether or not all affected group member management plans address appropriate management activities consistent with the maintenance and/or restoration of RTE species and their habitats.	
Minor CAR 2009.8	The Division of Forestry must develop a process for ensuring that acceptable management options are developed on group member properties identified in RTE species' habitat areas to the extent that these options are compatible with the maintenance and/or restoration of the species.
Deadline	By the first annual audit
Reference	FSC Indicator 6.2.d and Minor CAR 2009.7
DoF Response	The DoF developed a process for addressing RTE species and their habitats that included: 1) training programs for District Foresters and private foresters; 2) providing additional written information to foresters; and 3) plans for providing periodic updated information to foresters and landowners. As noted in CAR 2009.7, RTE species and their habitats are also addressed during pre-harvest conferences, harvest operation site visits, and management plan preparation.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: FSC Indicator 6.3.a.2 requires that silvicultural practices encourage regeneration that moves the forest toward a desired future condition, consistent with information gathered in 6.3.a.1. Although light harvests are beneficial regarding some environmental indicators, removals that are too light may not result in adequate regeneration of desired species. The Division of Forestry is renewing its commitment to focusing on the desired future condition of stands when preparing or reviewing management plans. As part of this effort, additional attention should be given to the regeneration of stands, where appropriate, as they relate to long-term desired future conditions.

Minor CAR 2009.9	The Division of Forestry must: 1) use available data (e.g., the recent analysis of FIA data) to evaluate the long-term stand development trajectory of group member properties as a whole, given current forest conditions, typical harvest practices, and expected successional patterns for dominant forest types; 2) evaluate the need for more long-term attention to regeneration harvests in dominant forest types (e.g., oaks, maples, etc.); 3) if such attention is warranted, evaluate the need for additional silvicultural training or guidelines related to regeneration harvests; and 4) implement such training and prepare and disseminate such guidelines, if warranted.
Deadline	By the second annual audit
Reference	FSC Indicator 6.3.a.2
DoF Response	<p>Item 1) The DoF has used FIA data to evaluate current conditions and to describe the likely current trajectory of the CF program forests. Given natural successional patterns, it is likely that in the future some oak-hickory forests will move into a more mature beech-maple stand type.</p> <p>Item 2) The DoF has evaluated the pros and cons related to regenerating the oak-hickory type, where feasible, vs. allowing stands to succeed into the beech-maple type. The DoF has recognized that training related to forest succession and management of regeneration is warranted and has sent several staff members to appropriate conferences and training sessions. The DoF is also working with academic institutions on the Hardwood Ecosystem Experiment to investigate the impacts of management on the forests of Indiana.</p> <p>Item 3) The DoF has developed plans for disseminating information regarding forest succession and regeneration to District Foresters and landowners through direct meetings and written guidance.</p> <p>Item 4) Training materials have been provided in some cases, but for the most part dissemination of training materials is planned for the near future, as the results of the Harwood Ecosystem Experiment become available.</p>
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: FSC Indicator 7.1.i requires that the management plan include a description and justification of harvesting techniques and equipment to be used. Indicator 7.1.i.1 requires that harvest machinery and techniques are discussed in the management or harvest plan. Indicator 7.1.i.2 further requires that conditions for each timber sale are established by a timber sale contract or written harvest prescription and accompanying timber sale map. Many parcels don't have harvest plans, unless they are prepared by a consulting forester or industry forester. Most operations in Indiana use the same equipment (i.e., chainsaw and skidder), so model discussions of typical harvest protocols for these systems could be handled at the group level. The team notes that harvest plans should be appropriate to the scale and intensity of operations, which is often a low-impact logging situation. The team also notes that the Division of Forestry provides landowners with model harvesting contracts.	
Minor CAR 2009.10	The Division of Forestry must: 1) develop a system for ensuring that management or harvest plans contain a description and justification of

	harvesting techniques and equipment to be used; and 2) take steps to ensure that the conditions for each timber sale on group member properties is established in a timber sale contract or written harvest prescription with an accompanying timber sale map.
Deadline	By the first annual audit
Reference	FSC Indicator 7.1.i and 7.1.i.2
DoF Response	Harvest techniques and equipment used on private lands is normally limited to chainsaw and skidder operations, which is discussed in the group's umbrella management plan. During the pre-harvest conference, District Foresters now provide a map that is used to identify key harvest features, such as boundaries, special features, and the location of log yards. If the timber sale is being managed by a private forester, the private forester's map can be used in lieu of the District Forester's maps. The DoF continues to provide information regarding timber sale contracts to group members. The harvest prescription is reviewed during the pre-harvest conference.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: As per Minor CARs 2009.7 and 2009.8, the Division of Forestry lacks processes for ensuring that landowners and forest workers are made aware of the presence of state and/or Federally listed RTE species and that management options are developed to maintain and/or restore RTE species and their habitats. Group members will need to be trained in how to implement these processes once they have been developed.	
Minor CAR 2009.11	The Division of Forestry must develop and implement any necessary training programs for landowners and forest workers related to the implementation of RTE processes developed in Minor CARs 2009.7 and 2009.8.
Deadline	By the first annual audit
Reference	FSC Indicator 7.3.a, Minor CAR 2009.7, and Minor CAR 2009.8
DoF Response	District Foresters have received additional training regarding RTE species and their habitats and they, in turn, provide one-on-one training to landowners as part of the management plan review process. One-on-one training is also provided to forest workers as part of the pre-harvest conference. Finally, informational materials regarding RTE species are periodically sent to group members.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: FSC Indicator 8.1.a requires that the frequency of monitoring activities follows the schedule outlined in the management plan. Monitoring frequency is rarely – if ever – discussed in the management plans. Most properties are small, however, and would be eligible for informal, qualitative assessments. Many monitoring activities can be done at the landscape (i.e., group) level (i.e., FIA data). The Division of Forestry, though, needs to clarify the	
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monitoring activities that will be associated with its FSC group at the parcel level. See also Major CAR 2008.15 (CLOSED) .	
Minor CAR 2009.12	The Division of Forestry must: 1) determine what monitoring activities are appropriate at the parcel level (see Major CAR 2008.15 [CLOSED]); 2) develop a system for ensuring that such monitoring activities are being carried out; and 3) develop any necessary training programs that are required to carry out such monitoring activities.
Deadline	By the first annual audit
Reference	FSC Indicator 8.1.a
DoF Response	Item 1) The DoF conducted an assessment on the monitoring activities that are appropriate at the parcel level, including monitoring of tree loss to windthrow or disease, trespass, dumping, exotic and invasive species, and plantings. Item 2) Monitoring at the parcel level includes 5-year site visits, visits before and during harvest operations, and visits at the request of a group member. In addition, landowners must report annually on their management activities. Item 3) The DoF has developed an is implementing training programs and materials for group members regarding the monitoring program.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: Group management Indicator C.1.b requires that the <u>group entity's</u> responsibilities, for example with respect to management planning, monitoring, harvesting, quality control, marketing, processing, etc., shall be clearly defined and documented. We note that this criterion relates closely to elements discussed in Major CAR 2008.3 (CLOSED) .	
Minor CAR 2009.13	In addition to complying with Major CAR 2008.3 (CLOSED) , the Division of Forestry must: 1) develop and implement a system for regularly assuring that Division of Forestry staff are aware of, and follow through on, their responsibilities related to management planning, monitoring, harvesting, quality control, marketing, and processing.
Deadline	By the first annual audit
Reference	Group C.1.b
DoF Response	Upon initial certification, the DoF developed training programs for District Foresters and private foresters that highlighted responsibilities related to management of the FSC group. The DoF also developed a program for assessing performance related to group management for all District Foresters that includes periodic site visits to each District by the Assistant State Forester for Private Lands and other FSC group management staff.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: Group management Indicator C.2.b requires the group members' management responsibilities, for example with respect to management planning, monitoring, harvesting,

quality control, marketing, processing, etc. shall be clearly defined and documented.	
Minor CAR 2009.14	In addition to complying with Major CAR 2008.3 (CLOSED) , the Division of Forestry must: 1) develop and implement a system for regularly assuring that group members are aware of, and follow through on, their responsibilities related to management planning, monitoring, harvesting, quality control, marketing, and processing.
Deadline	By the first annual audit
Reference	Group C.2.b
DoF Response	The DoF has developed a system for ensuring that group members are aware of their management responsibilities that is based on periodic mailings, notification of webpage updates, annual reporting requirements, and periodic visits from District Foresters.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: FSC Criterion 1.1 requires that forest management shall respect all national and local laws and administrative requirements. Indiana's Classified Forest & Wildlands Program requires that management plans be updated every 10 years and that landowners agree to follow their plan. Some plans, however, were found to be out-of-date, resulting in the issuance of Major CAR 2008.1. The Division of Forestry successfully addressed Major CAR 2008.1 by providing a timetable and methodology for bringing out-of-date plans into compliance. This Minor CAR, however, is being issued to provide an opportunity for ensuring that the proposed methodologies are being implemented.	
Minor CAR 2009.15	The Division of Forestry must: 1) report on the results of efforts to complete missing management plans and to update inadequate plans; and 2) provide auditor access to copies of recently completed or updated management plans.
Deadline	By the first annual audit
Reference	FSC Indicator 1.1.a.
DoF Response	The DoF provided a report on the progress for updating missing and inadequate management plans that demonstrated that progress is on track. As part of the 2010 audit, the DoF provided the auditor with copies of the management plans for all properties that were visited. Other management plans were made available upon request.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: FSC Criterion 6.9 requires that the use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts. Criterion 6.9 can apply to such activities as planting, erosion control seed mixes, and wildlife food plots. Major CAR 2008.12 required the Division of Forestry to inform group members of the requirements of Criterion 6.9, develop a system for monitoring use of exotic species on group member properties, and investigating alternatives to using exotic species, where possible. The Division of Forestry successfully addressed Major CAR 2008.12 and this Minor CAR is issued to ensure that

proposed methodologies are being implemented.	
Minor CAR 2009.16	The Division of Forestry must: 1) provide evidence documenting that landowners have been informed of requirements related to the use of exotic species; 2) provide a summary of the results of monitoring of exotic species use on group member properties; 3) report on efforts to identify acceptable uses of exotic species (e.g., where adverse ecological impacts are not expected); and 4) report on efforts to identify alternatives to using exotic species.
Deadline	By the first annual audit
Reference	FSC Indicator 6.9.d.
DoF Response	Item 1) Copies of mailings to landowners regarding exotic and invasive species were provided to the auditor. Item 2) Group members must report annually on planting and the DoF has identified alternatives to exotic and invasive. District Foresters reported on their monitoring efforts related to exotic and invasive species as part of the 2010 audit. Item 3) Copies of mailings to landowners regarding alternatives to exotic and invasive species were provided to the auditor. Item 4) The DoF provided reports on their efforts to identify the use of exotic and invasive species and to inform group members about alternatives to such uses.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the CAR.
Status	CLOSED

Nonconformity: FSC Criterion 8.3 requires that documentation shall be provided to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as "chain-of-custody". Major CAR 2008.16 was issued, requiring the Division of Forestry to develop a system for tracking forest products harvested from group member properties to the next point in the certification chain when claims of FSC-certified product are sought. The Division of Forestry addressed Major CAR 2008.16 by developing chain-of-custody protocols for group members. Appendix 1 of the protocols listed manufactured products (e.g., tool handles, kitchenware, and furniture) and non-timber forest products (e.g., nuts, plant parts, and maple sugar). A combined Forest Management and Chain-of-Custody certificate, however, only covers logs and chips and separate methodologies and auditing procedures are required for manufactured goods or non-timber forest products.	
Minor CAR 2009.17	The Division of Forestry must: 1) revise their chain-of-custody procedures to reflect only the sale of logs or chips; and 2) revise the product list to only include logs or chips.
Deadline	By the first annual audit
Reference	FSC Criterion 8.3
DoF Response	The DoF revised its chain-of-custody procedures, as well as its product list, to ensure that the stump-to-gate certificate was only being used for logs, chips, and firewood. District Foresters, private foresters, and group members have been provided with materials clarifying what the group's chain-of-custody program covers.
Auditor's	The information provided by the DoF demonstrates an acceptable response

Comments	to the requirements of the CAR. The DoF has discussed the potential sale of FSC-certified non-timber forest products (NTFPs) with group members (e.g., maple syrup) and understands that internal chain-of-custody systems would need to be developed prior to adding these products to the product group list.
Status	CLOSED

Background/Justification: FSC Indicator 1.1.b requires that forest management plans and operations comply with state Best Management Practices (BMPs) and other forest management guidelines applicable to the forest, both voluntary and regulatory (see also Criterion 6.5). During the site visits, some District Foresters did not demonstrate a detailed understanding of applicable BMPs. While potentially understandable because they do not normally supervise harvest operations, management of an FSC group would be facilitated through a better understanding of BMPs. The same is true for seasonal interns or other staff conducting 5-year property inspections and logging contractors.	
REC 2009.1	We recommend that the Division of Forestry: 1) evaluate the need for additional BMP training for District Foresters; 2) develop and implement appropriate training programs for District Foresters, if warranted; 3) review and revise, as necessary, BMP training requirements for seasonal interns or other staff conducting 5-year property inspections, and 4) offer BMP training to logging contractors or support existing efforts by other parties in the State that provide such training.
Reference	FSC Indicator 1.1.b
DoF Response	The DoF evaluated its BMP training program for District Foresters and determined that its recent training efforts adequately addressed the topic. The DoF, however, continues to develop BMP training programs and one-on-one training is provided when District Foresters participate in the 10% full BMP audit program. The DoF has reviewed its use of seasonal interns and is moving toward longer-term arrangements when temporary help is warranted. Such staff would be under the direct supervision of District Foresters who have received BMP training. BMP training has been provided to logging contractors and other parties.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the REC.
Status	CLOSED

Background/Justification: FSC Indicator 1.6.b requires that forest owners or managers document the reasons for seeking partial certification. The Division of Forestry has eligibility criteria for membership in the Classified Forest Program FSC certification pool. There may, however, be small areas of eligible, but unclassified, forests on parcels that are enrolled in the Classified Forest Program. The team believes that this would be a small acreage, but recommend that the Division identify such parcels on group member properties and encourage their enrollment in the Classified Forest Program.	
REC 2009.2	We recommend that the Division of Forestry: 1) develop a program for screening member properties to determine if they contain any forested areas that are eligible to be enrolled in the Classified Forest Program but

	that are as yet un-enrolled; and 2) take steps to encourage the enrollment of such areas or document reasons why the landowner does not wish to undertake such actions.
Reference	FSC Indicator 1.6.b
DoF Response	District Foresters screen group member properties for additional lands that could be certified at the time of the 5-year re-inspection or the management plan update. At these times, District Foresters encourage landowners to enroll all their lands and they explain the advantages of membership in the FSC group. When landowners choose not to document portions of their holdings, the District Forester records their reasons.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the REC.
Status	CLOSED

Background/Justification: FSC Indicator 2.1.a requires that forest owners or managers document the legal and customary rights associated with the forest. These rights include both those held by the party seeking certification and those held by other parties. Based on management plans inspected to date and interviews with District Foresters, it appears that most legal rights are described in the management plan, including leases, easements, County roads, oil and gas wells and lines, and County drainage easements. The team recommends, however, that the need to include these legal rights, as well as any customary rights, in the management plan for each parcel should be reinforced with District Foresters, industry foresters, and consulting foresters.	
REC 2009.3	We recommend that the Division of Forestry: 1) inform District Foresters, industry foresters, and consulting foresters of the need to document legal and customary use rights in the management plan; and 2) develop a quality assurance program for ensuring that such information is included in all management plans.
Reference	FSC Indicator 2.1.a
DoF Response	The DoF developed a program for ensuring that legal and customary rights are identified in the management plan. District Foresters and private foresters were informed of the program and will be taking steps to ensure its implementation. The quality assurance program for these efforts is based on the DoF's internal QA/QC program for reviewing updated management plans.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the REC.
Status	CLOSED

Background/Justification: FSC Indicator 3.1.a requires that on tribal lands, forest management and planning includes a process for input by an authorized tribal governing body. Tribal enterprises are known to be buying land in Indiana, and these properties <u>may</u> be enrolled in the Classified Forest Program. Tribal enterprise lands would be subject to the requirements found in Principle 3 that relate to tribal lands.	
REC 2009.4	We recommend that the Division of Forestry: 1) screen their Classified Forest Program database for lands owned by tribal enterprises and see

	what processes exist for soliciting input by an authorized tribal governing body. If such lands are found, we recommend that the Division of Forestry take all steps necessary to ensure compliance with relevant aspects of Principle 3.
Reference	FSC Indicator 3.1.a
DoF Response	The DoF screened the FSC group member database and found that only 2 properties were owned by tribal enterprises. These parcels were evaluated and it was found that forest management was not a top priority for the land purchase. The DoF has reviewed the requirements of Indicator 3.1.a and is aware of the requirements related to tribally-owned lands.
Auditor's Comments	The information provided by the DoF demonstrates an acceptable response to the requirements of the REC.
Status	CLOSED

2.5 General Observations

The DoF has made notable progress in its implementation of programs designed to ensure compliance with the FSC Principles and Criteria on group member properties. The new program requiring a pre-harvest conference and periodic site visits by the District Forester during harvest operations, for example, is being implemented with success. It was also clear that training programs for District Foresters related to RTE species and their habitats, as well as other elements of the group management system, have been effective. As previously noted, the DoF is making strong progress toward upgrading deficient management plans and all properties must have a current management plan prior to any harvest activities.

District Foresters have been reminded about the requirements and regulations regarding cultural resources that might occur on group member properties. The State of Indiana's cultural resource experts can provide information related to known sites to landowners, but they cannot share it directly with District Foresters. District Foresters, therefore, have been trained to ask landowners to provide this information so that it can be incorporated into the management and harvest planning processes.

District Foresters have also received additional training related to RTE species, their habitats, and rare or unique natural communities. As with cultural resources, this information is incorporated into management plan updates and harvest planning processes.

One of the sites visited during the 2010 audit was to an oak stand that was harvested and is now scheduled for an experimental burn to promote oak regeneration. The DoF is assisting the landowner with this effort through planning, burn implementation, and post-burn monitoring. Lessons learned from this effort will be disseminated to other group members.

Although there are still a significant amount of management plans that are deemed to be inadequate, or that are missing, the DoF's new program for requiring an updated plan prior to any harvest activities ensures that all elements of the group's program are being implemented.

The recent attention to BMP training and monitoring was apparent in interviews with District Foresters, meetings with logging contractors, and inspection of recently completed harvest operations.

2.6 New Corrective Action Requests and Recommendations

No new Corrective Action Requests.

Recommendations:

No new Recommendations.

2.7 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document reviews, the SCS auditor concludes that the DoF's management of the CF group in Indiana continues to be in strong overall compliance with the FSC Principles and Criteria, as now further elaborated by the FSC-US Forest Management Standard (v1.0). That is, the SCS auditor has concluded from this annual audit that the program is in general conformance with FSC Principles 1 through 9 (Principle 10 is not applicable as CF operations are classified as "natural forest management" under the FSC definitions). As such, continuation of the certification is warranted, subject to subsequent annual audits.

3.0 DETAILED OBSERVATIONS

This section is divided into two parts: Section 3.1 details the determining of conformance and non-conformance with the elements of the standard examined during this audit. Section 3.2 discusses any stakeholder comments.

3.1 Evaluation of Conformance

Normally the auditor would select two or more FSC Principles and re-evaluate conformance to them as part of the annual audit, thereby confirming that the forest management operation continues to be in overall conformance with the appropriate standards. This year (2010), however, is a transitional year in that the FSC approved the FSC-US Forest Management Standard (ver. 1.0) in July of 2010. In lieu of re-evaluating conformance to two or more Principles, the auditor elected to conduct a preliminary evaluation of conformance to the major new elements in the FSC-US Forest Management Standard, as defined by a crosswalk between the Lake States and the FSC-US standard that was prepared by the FSC US. In the FSC's crosswalk, additional requirements in the new standard were highlighted in red or yellow, with red indicators including "*...one or more new requirements that are central to the intent of the indicator itself or the associated criterion.*" The following table focuses on the red-highlighted indicators.

All members of the CF group qualify for the definition of a "small" operation and are eligible for the Family Forest Indicators contained in the new FSC-US Forest Management Standard. A Group Manager who wishes to be audited to the Family Forest Indicators, however, must conduct a risk assessment of the group to evaluate which indicators and guidance are appropriate to the group, based on group size, scale and intensity of operation, and the likelihood of impact. The risk assessment must be conducted and evaluated as part of the evaluation process and it is assumed that such a risk assessment, if conducted by the DoF, would be subject to a future audit process.

New requirements in the FSC-US Forest Management Standard (v1.0) as compared to the: FSC Lake States Regional (v3.0)

This table is intended to provide the user with a crosswalk between the current FSC-US Forest Management (FM) Standard (V1.0, July 8, 2010) and previous regional standards. The table is designed to assist auditors and existing certificate holders in identifying new requirements in the revised FSC US Forest Management Standard (V.1.0) that did not exist in the pre-existing FSC US regional standard. As all certificates must be in conformance with the new national standard effective October 2010, auditors are encouraged to employ this table as a tool for evaluating conformance to the new standard for all existing certificate holders.

The table can also be used as an interpretive guide in preparing for and conducting future evaluations to assist in the application of changes in the standard that do not result in new requirements, but that do include revised language and/or guidance. The general nature of identified new requirements is indicated in italics in the “Comments” column. Certification Bodies (CBs), auditors, and land owners/managers should refer to the FSC-US FM Standard for specific indicator language. This table does not show where requirements of the FSC-US FM Standard are a relaxation of the regional standard.

FSC-US regional standards were developed with the understanding that conformance would be measured against Criterion and Indicator language. In cases where in regional standards Criterion language includes explicit requirements not captured in Indicators, these are not considered new requirements. For example, in cases where regional standards included the phrase *“The working group considers this Criterion sufficiently explicit and measureable. Indicators are not required”* not all new Indicators are considered new requirements.

“Additional Requirement” column categories:

Y	The indicator includes one or more new requirements that are central to the intent of the indicator itself or the associated criterion. Conformance to these indicators must be verified as a new requirement.
Y	The indicator includes new language that is not central to the intent of the indicator, includes minor changes from the current standard, or the new requirement is addressed by a prior indicator (where redundant). CBs are encouraged to familiarize themselves with these Indicators and to understand the likelihood that these indicators might lead to new requirements based on site-specific field conditions, but they need not be addressed in the first annual audit updating current certificates to the new standard. However, these elements will be addressed in assessments and reassessments and routing surveillance audits in subsequent years.
X	FSC-US considers this not to be a new requirement. However, these indicators include new and explicit language that did not exist in previous standards. The existence of additional requirements, if any, was judged to be unlikely but dependent on past interpretation of the regional standard.
--	Indicator requirements are effectively the same. Very minor differences may exist.

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments <i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements. Normal text: comments or additional references	Auditor Comments Based on 2010 Audit
Principle 1				
1.1.a	1.1.a	--	FSC-US FM STANDARD requires that evidence of violations, etc. be supplied to the CBs. This would have been requested by CBs under regional standard.	
1.1.b	-	Y	<ul style="list-style-type: none"> <i>Forest manager ensures forest workers are informed about laws and regulations</i> 	<ul style="list-style-type: none"> <i>The DoF posts notifications regarding applicable laws and regulations in work places, as required.</i> <i>Relevant laws and regulations related to harvest operations are discussed at the pre-harvest conference.</i>
1.2.a	1.2.a	Y	<ul style="list-style-type: none"> <i>Written evidence demonstrating compliance required</i> 	<ul style="list-style-type: none"> <i>Most landowner fees are paid at the County level and each County keeps written records.</i> <i>The DoF might need to provide written evidence demonstrating compliance as part of a future evaluation.</i>
1.3.a	1.3.a	--		
1.4.a	1.4.a	--	<ul style="list-style-type: none"> <i>Report conflicts to CB, not FSC</i> 	<ul style="list-style-type: none"> <i>The DoF maintains close contact with SCS in between surveillance audits and would report potential regulatory conflicts should they arise.</i>
1.5.a	1.5.a	--		
1.5.b	1.5.a	X	Likely has been interpreted to be part of LS 1.5.a in the past	
1.6.a	1.6.a, 1.6.c	X	Although the FSC-US Land Sales Policy is referenced in the standard, it has not been finalized and approved by the Board. In cases where this may be an issue, FSC-US requests this be brought to our attention.	
1.6.b	1.6.b	Y	<ul style="list-style-type: none"> <i>Additional documentation required for lands withheld from certification, including location, natural resources, and planned management activities.</i> 	<ul style="list-style-type: none"> <i>Clarification may be needed from the FSC regarding how this indicator applies to small, privately held parcel that are members of the CF group.</i>

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments <i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements. Normal text: comments or additional references	Auditor Comments Based on 2010 Audit
				<ul style="list-style-type: none"> <i>District Foresters document lands that are not enrolled in the FSC group and encourage members to enroll all of their holdings.</i> <i>District Foresters record reasons for not certifying parcels (generally related to costs).</i>
1.6.c	--	Y	<ul style="list-style-type: none"> <i>Ownership and management change notification now required</i> 	<ul style="list-style-type: none"> <i>DoF notifies SCS of any additions to the FSC group.</i>
Principle 2				
2.1.a	2.1.a	--		
2.1.b	2.1.a	--		
2.1.c	2.1.b	Y	<ul style="list-style-type: none"> <i>Prior to management activities, boundaries must also be shown on maps</i> 	<ul style="list-style-type: none"> <i>The District Forester provides a map showing boundaries as part of the pre-harvest conference.</i>
2.2.a	2.2.a	--	LS standard allows FME to limit exercise of rights to those consistent with the management plan. FSC-US FM STANDARD provides no such exceptions, but it does define tenure and use rights to be legally established rights.	
2.2.b	2.2.c	--		
2.3.a	2.3.a	--		
2.3.b	2.3.b	--		
Principle 3				
3.1.a	3.1.a, 3.1.b, 1.1.a	--		
3.1.b	3.1.b	Y	<ul style="list-style-type: none"> <i>Specifies that Informed consent must be in writing</i> 	<ul style="list-style-type: none"> <i>Only applies to tribal lands.</i>
3.2.a	3.2.a	--	Language is different by intent appears to be the same	
3.2.b	3.2.b, 7.1.b.5	Y	<ul style="list-style-type: none"> <i>Where applicable, measures to protect tribal resources are included in the management plan</i> 	<ul style="list-style-type: none"> <i>There are no known tribal resources on CF group member properties.</i> <i>There are two properties in the CF group that are owned by tribal enterprises, but</i>

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments <i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements. Normal text: comments or additional references	Auditor Comments Based on 2010 Audit
				<i>no management activities are planned in the short term.</i>
3.3.a	3.3.a	--		
3.3.b	3.3.b, 3.3.c	--		
3.4.a	--	--	Not included as indicator language in regional standard but would be covered by auditor in order to address the criterion	
3.4.b	3.4.b	--		
3.4.c	3.4.a	--		
Principle 4				
4.1.a	4.1.e, 4.1.b	--		
4.1.b	4.1.b	--		
4.1.c	4.1.a, 4.1.b, 4.1.e	--	"Fair wages" is not defined and no guidance is given, but the concept appears to be adequately consistent and covered by the regional standard indicators listed.	
4.1.d	4.1.f, 1.1.a	--		
4.1.e	4.1.b, 4.1.e	--		
4.1.f	4.1.c	--		
4.1.g	4.1.d	--		
4.2.a	1.1.a, Criterion 4.2	--		
4.2.b	4.2.a	Y	<ul style="list-style-type: none"> <i>Contracts or other written agreements include safety requirements. Previously, this was listed as an example.</i> 	<ul style="list-style-type: none"> <i>Timber Sale Agreement templates include safety requirements.</i> <i>The DoF has reinforced recommendations related to safety requirements.</i>
4.2.c	4.2.a, 7.3	--		
4.3.a	4.3.a	--		
4.3.b	4.3.b	--		
4.4.a	See list in Comment column for corresponding regional	Y	<p>Social impact assessment is required. Bullet list below is from new standard followed by corresponding regional indicator; new requirements in italics:</p> <ul style="list-style-type: none"> Archeological/cultural/historical/community sites: LS 	<ul style="list-style-type: none"> <i>The DoF may need to evaluate its social impact assessments for the group to ensure that they fully meet the requirements of the indicator.</i>

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments <i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements. Normal text: comments or additional references	Auditor Comments Based on 2010 Audit
	indicators for each bullet list item		3.3, 4.4.b <ul style="list-style-type: none"> • Public resources: LS 2.2.a, 2.2.c, Principle 3, 5.5 • Aesthetics: LS 4.4.c, 6.5.b • Community goals: LS 4.4.d • Community economic opportunities: LS Criterion 4.1, 7.1.b.5 • Other people who may be affected : LS 2.2.a, 2.2.b, Principle 3, 4.4.a, 4.4.b, 4.4.c, 4.4.d, 4.4.e <p><i>A summary is available to the CB</i> (new requirement).</p> <p>Note: Many of the bullet list items in FSC-US FM Standard 4.4.a are addressed in whole or in part by the regional standard. What is clearly new is the requirement to prepare a summary of the assessment. In addition, the assessment process itself as described in the Intent and Guidance statements may be more than has been expected in the indicators listed above, many of which focus on an end result (e.g., no impact) rather than an assessment process.</p> <p>See also FSC-US FM Standard 7.1.j</p>	<ul style="list-style-type: none"> • <i>The DoF provides summaries of the social impact assessments that it performs for the CF group.</i>
4.4.b	4.4.d, 4.4.c, 4.4.a	--		
4.4.c	4.4.c	--		
4.4.d	4.4.e	--		
4.5.a	Criterion 4.5	--	No equivalent indicator, but addressed by criterion-level language in regional standard.	
4.5.b	4.5.a	--	Overall the same intent, but includes specific reference to dispute resolution procedures.	
4.5.c	Criterion 4.5	--	No equivalent indicator, but addressed by criterion-level language in regional standard.	
Principle 5				
5.1.a	5.1.a	--		

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments <i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements. Normal text: comments or additional references	Auditor Comments Based on 2010 Audit
5.1.b	5.1.b	--		
5.2.a	5.2.a, Criterion 4.1	--	5.2.a addresses processing facilities. LS 4.1.a includes as an example opportunities for local goods and service providers, but this is not consistent with the actual language of LS 4.1.a; criterion-level language of LS 4.1 best addresses FSC-US FM STANDARD 5.2.a for facilities other than processing facilities. In sum, the intent of this indicator is met by the regional standard.	
5.2.b	5.2.c	--		
5.2.c	4.1.a	Y	<ul style="list-style-type: none"> <i>On public forests, some sales or contracts are scaled to allow small business to bid competitively.</i> (Formerly and example for LS 4.1.a). 	<ul style="list-style-type: none"> <i>Not applicable to private lands.</i>
5.3.a	5.3.b	--		
5.3.b	5.3.c, 6.5.b	X	The FSC-US FM STANDARD bullet point “ <i>damage to NTFPs is minimized</i> ” was likely included by intent in the regional standard but not explicitly listed in an indicator.	
5.4.a	5.4.a	--	Demonstration of knowledge not explicitly required by the regional standard, but would be necessary to meet the intent of the indicator.	
5.4.b	5.4.a	--		
5.5.a	Criterion 5.5	Y	<ul style="list-style-type: none"> <i>Measures to enhance carbon storage and sequestration, recreation, and tourism are now included.</i> 	<ul style="list-style-type: none"> <i>Management plans currently reference recreational uses, most of which would not be directly relevant to tourism (i.e., the lands are privately held).</i> <i>All stands are well-stocked (i.e., carbon storage).</i>
5.5.b	Criterion 5.5	Y	<ul style="list-style-type: none"> <i>See comment for 5.5.a</i> 	<ul style="list-style-type: none"> <i>See above.</i>
5.6.a	5.6.a, Criterion 7.1.d	Y	<ul style="list-style-type: none"> <i>FME provides a clear rationale for size and layout of sustained yield planning unit.</i> <i>Calculation considers multiple treatments/entries and regrowth beyond a single rotation.</i> 	<ul style="list-style-type: none"> <i>Sustained yield calculations are based on long-term desired future conditions.</i> <i>In most cases, the planning unit is the parcel, but for some larger properties, individual stands might be the planning unit.</i>

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments <i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements. Normal text: comments or additional references	Auditor Comments Based on 2010 Audit
			Note: this item is included because the bullet list in FSC-US FM Standard 5.6.a is more explicit than in the regional standard. While the items in the FSC-US FM STANDARD bullet list should have been considered <i>de facto</i> in past assessments and audits, some differences between the FSC-US FM Standard and the regional standard may occur on some FMUs.	
5.6.b	5.6.b	X	LS 5.5.b requires that harvest is less than accumulated growth, FSC-US FM STANDARD requires that harvest does not exceed the calculated sustained yield harvest level.	
5.6.c	--	Y	<ul style="list-style-type: none"> • <i>Rates and methods of harvest improve or maintain health or quality.</i> • <i>Overstocked and understocked stands are returned to desired stocking levels at the earliest practicable time.</i> 	<ul style="list-style-type: none"> • <i>The majority of harvests are improvement cuts designed to improve the health and growth of the residual stand.</i> • <i>Regeneration cuts are well planned and designed to ensure future timber supplies.</i> • <i>The DoF prioritizes stands that are notably over-stocked or under-stocked in the management plan.</i>
5.6.d	5.6.a	X	A new Indicator relating to NTFP sustained harvest calculation has been added, which may be required in some cases. Although, NTFPs were not explicitly listed in the regional standard, commercial harvest likely would have led to consideration in 5.6.a – which is not limited to timber.)	
Principle 6				
6.1.a	6.1.a, 6.1.b	Y	<p>Numbers from FSC-US FM Standard and corresponding LS Indicator (new requirements in bold italics):</p> <p>1) <i>Forest community types, development/size class/ or successional stage now required</i> (new; replaces “common plants, animals, and their</p>	<ul style="list-style-type: none"> • <i>The DoF, working closely with the Division of Nature Preserves, considers all the items indicated in 6.1.a in its management planning processes.</i>

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			<ul style="list-style-type: none"> 2) <i>R, T, E species and rare ecological communities (note new definition of RTE species and resulting change of requirements):</i> LS 6.1.a. 3) <i>Other habitats and species of management concern</i> (may be covered by “sensitive” but clearly goes beyond threatened and endangered). 4) Water resources: LS 6.1.a; <i>riparian habitats and hydrologic functions:</i> (new). 5) Soil resources: LS 6.1.a. 6) Historic conditions compared with current conditions: LS 6.1.b. 	
6.1.b	6.1.c	--		
6.1.c	6.1.d	--		
6.1.d	6.1.e	Y	<ul style="list-style-type: none"> • <i>On public lands, draft assessments developed for 6.1.a are made available for public review and comment prior to finalization.</i> 	<ul style="list-style-type: none"> • <i>Not applicable on private lands.</i>
6.2.a	6.2.b	--		
6.2.b	Criterion 6.2, 6.2.a, 6.2.b, 6.2.d	--		
6.2.c	--	Y	<ul style="list-style-type: none"> • <i>Species recovery and landscape biodiversity goals is now required for public forests.</i> 	<ul style="list-style-type: none"> • <i>Not applicable on private lands.</i>
6.2.d	1.5.a, 6.2.d, Criterion 6.2	-	Control hunting, fishing, and trapping to minimize risk included as an indicator but formerly addressed through Criterion-level language in regional standard.	
6.3			Note major reorganization to 6.3	
6.3.a.1	6.3.a.2, 6.3.b.4, 6.3.d.4	Y	<ul style="list-style-type: none"> • <i>Clarification that under-represented successional stages are to be maintained or restored.</i> 	<ul style="list-style-type: none"> • <i>Most stands are well-stocked mature forests, but where they occur, under represented successional stages are considered in the individual parcel management plan.</i>
6.3.a.2	Criterion 6.4	--		
6.3.a.3	6.4.d,	Y	<ul style="list-style-type: none"> • <i>Specific definition of Type 1 and Type 2 old</i> 	<ul style="list-style-type: none"> • <i>The DoF has conducted an analysis of</i>

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	Principle 9		<i>growth definitions may include more stands than were previously considered to be “old growth” under the regional standard may require additional and/or revised old growth assessments.</i>	<i>the potential presence of Type 1 and Type 2 old growth and concludes that Type 1 old growth likely does not occur on group member properties.</i> • <i>Type 2 old growth may occur in the future in certain areas.</i>
6.3.b	6.3.a.1, 6.3.a.4 6.3.b.1, 6.3.b.4	Y	• <i>Specific requirements for landscape-scale management for animal species habitat.</i> (Some of this may have been addressed under the listed LS indicators, but the intent of FSC-US FM STANDARD 6.3.b is more specific.)	• <i>The landscape context of the parcel is considered in the management plan, but individual parcels are too small to allow effective landscape scale management of habitats.</i> • <i>The CF lands, as a whole, are designed in large part to ensure sustainable forests.</i>
6.3.c	6.3.b.1, 6.5.b	X	Sub-indicators a-e clarify the functions of riparian zones, whereas LS 6.3.b.1 does not mention riparian habitats and 6.5.b is focused on protecting aquatic habitats and water quality. These changes could pose added requirements on some ownerships, depending on prior interpretation of the regional standard and the definition of riparian zone used by the FME.	
6.3.d	6.3.a.4, 6.3.b.3, 6.3.a.3	--		
6.3.e	6.3.b.1	Y	• <i>“Local seed source” is included in the indicator, not as an example as in regional standard.</i>	• <i>The DoF may need to ensure that the use of local seed source is adequately documented.</i>
6.3.f	6.3.b.1, 6.3.b.3, 6.3.c.1	--		
6.3.g.1	6.3.a.5	--	Even-aged retention requirements of LS standard now in Appendix C of FSC-US FM Standard.	
6.3.g.2	--	--	Optional plan to 6.3.g.1 may be submitted	
6.3.h	6.9.d	Y	Invasive species control now includes:	• <i>The DoF actively monitors invasive</i>

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			<ul style="list-style-type: none"> <i>extent/threat assessment,</i> <i>practices to minimize risk/spread, and</i> <i>monitoring of control measures.</i> 	<i>species and evaluates the extent and threat associated with specific species and evaluates the need for specific control measures.</i>
6.3.i	6.5.b	Y	<ul style="list-style-type: none"> <i>Fuels management practices are required for forest types that are fire-dependent and at-risk of wildfire.</i> 	<ul style="list-style-type: none"> <i>Most stands in Indiana would not be considered truly fire-dependent or at risk of wildfire.</i>
6.4.a	6.4.a 6.4.b	Y	RSA assessment processes has been clarified; existing assessments should be reviewed to ensure that they meet the requirements of 6.4.a.	
6.4.b	6.4.b, 6.4.a	Y	<ul style="list-style-type: none"> <i>Extends requirement to Family Forests to designate RSAs where outstanding examples of common community types exist. (No change for mid-sized and large forests.)</i> 	<ul style="list-style-type: none"> <i>Outstanding examples of common community types would be identified by the Division of Nature Preserves and accounted for in the management plan.</i>
6.4.c	6.4.b	Y	<ul style="list-style-type: none"> <i>Places explicit limits on management within RSAs.</i> This may have been implicit in 6.4.a and 6.4.b. “ecologically viable” and the Criterion-level guidance. 	<ul style="list-style-type: none"> <i>Any management within RSAs would be done in consultation with the Division of Nature Preserves.</i>
6.4.d	--	Y	<ul style="list-style-type: none"> <i>Periodic review and update (as needed) of RSA assessment</i> 	<ul style="list-style-type: none"> <i>The DoF will review and update its RSA assessment at 5-10 year intervals.</i>
6.4.e	6.4.g	--	“Interior core habitat” (FSC-US FM STANDARD 6.4.e) is captured by the concept of “sufficient size...” in LS 6.4.g.	
6.5.a	Criterion 6.5; 7.1.f	--	Although this is a new indicator, it repeats a criterion-level requirement.	<ul style="list-style-type: none"> <i>Indiana as a Best Management Practices (BMP) guide that addresses erosion control during logging operations. Indiana also has BMP guides related to logging that cover additional topics.</i> <i>Published BMP guides are supplemented with periodic mailings (e.g., in newsletters) to group members that relate to resource protection during harvest operations.</i> <i>District Foresters provide one-on-one</i>

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6.5.b	1.1.b	--		<i>information regarding BMPs during the pre-harvest conference and periodic harvest operation site visits.</i>
6.5.c	See Comments column for crosswalk by FSC-US bullet item	Y	<p>Bullets from FSC-US FM Standard and corresponding LS Indicator (new requirements in bold and italics):</p> <ul style="list-style-type: none"> • Slash concentration: LS 6.5.b. • Topsoil disturbance: LS 6.5.b. • Rutting/compaction: LS 6.5.b, 6.3.c.2. • Soil erosion: LS 6.5.b. • Burning: (new). • Ground cover disturbance: LS 6.5.b includes “top soil disturbance;” which is a similar, but potentially lower threshold of conformance. • Whole tree harvesting: LS 6.3.c.2 includes whole tree harvesting as a example; but there may be no effect on most current certificates because in the FSC-US FM STANDARD this only applies to whole tree harvesting on multiple rotations. • Low impact equipment: LS 6.5.b, 6.3.c.2. 	
6.5.d	See Comments column for crosswalk by FSC-US bullet item	--	<p>Bullets from FSC-US FM Standard and corresponding LS Indicator (new requirements in bold and italics):</p> <ul style="list-style-type: none"> • Access to roads and trails is controlled: LS 6.5.b. • Road density minimized: LS 6.5.b. • Erosion minimized: LS 6.5.b. • Sediment discharge to streams minimized: LS 6.5.b. • Stream passage for aquatic organisms: LS 6.5.b. • Wildlife habitat and migration corridor impacts minimized: LS 6.5.b example, 6.3.b.4. • Area converted to roads, skid trails, and landings minimized: LS 6.5.b. • Habitat fragmentation minimized: LS 6.5.b. 	

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			example, 6.3.b.4. • Unneeded roads closed and rehabilitated: LS 6.5.b.	
6.5.e.1	6.3.c.3, 6.3.b.4, 6.5.b	--		
6.5.e.2	--	--	Optional plan to requirements of 6.5.e.1 and Appendix G may be submitted.	
6.5.f	6.5.b, 6.3.b.4	--		
6.5.g	6.5.b	Y	• <i>Recreation use impacts are explicitly addressed by indicator.</i> This may have been previously addressed under LS 6.5.b. Even if field conformance has been evaluated by CBs, written guideline are necessary as per FSC-US FM STANDARD 6.5.a.	
6.5.h	6.3.c.3, 6.5.b	Y	• <i>Grazing impacts explicitly addressed by indicator.</i> This may have been previously addressed under LS 6.3.c.3 and 6.5.b. Even if field conformance has been evaluated by CBs, written guideline are necessary as per FSC-US FM STANDARD 6.5.a.	
6.6.a.	6.6.a	--	Updates Pesticide Policy reference to 2005.	
6.6.b	6.6.b, 6.6.c, 6.6.d	Y	FMS-US FMS 6.6.b has three major components (indicated by bullets in the flowing list; new requirements in bold italics): • <i>Chemicals are only used when non-chemical methods are:</i> a) <i>Not available,</i> b) <i>Prohibitively expensive, considering risks and benefits,</i> c) <i>The only effective means for controlling invasive species,, or</i> d) <i>Result in less environmental damage than non-chemical alternatives.</i> LS 6.6.b says that “non-chemical techniques are preferred,” whereas FSC-US FM STANDARD lists these four explicit alternatives when chemicals may	• <i>Landowners use chemicals only when other measures would not be effective for controlling invasive or exotic species or improving stand conditions.</i> • <i>The DoF has written strategies for chemical use on group member properties, but may need to evaluate this documentation to ensure that it fully complies with the new elements in this indicator.</i>

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			<p>be used.</p> <ul style="list-style-type: none"> The least environmentally damaging formulation and application method practical is used: LS 6.6.d <i>Written strategies are developed and implemented that justify the use of pesticides.</i> (Indicator 6.6.c is specific to pests, and may not include justification for pesticide use. Indicator 6.6.g requires a prescription but also may not include a justification for pesticide use.) 	
6.6.c	6.6.d, 6.6.f	X	The FSC-FMS requires a comparative risk evaluation between aerial and ground application, but this appears to be implicit in the interpretation of LS 6.6.d (non-target species and sites) and LS 6.6.f (comparative risk of worker exposure).	
6.6.d	6.6.f, 4.1.a 4.2.a 7.3.a	Y	<ul style="list-style-type: none"> <i>Written prescription must include site specific hazards, environmental risks, and precautions worker will employ to avoid or minimize those risks.</i> (Regional standard was unclear if “risks” and “precautions” referred to environmental risks or worker health and safety. FSC-US FM Standard clarifies applicability.) <i>Proper training and use of protective equipment required.</i> (Formerly encompassed by broader requirements of LS 4.1.da 4.2.a and 7.3.a but auditors will now be required to explicitly address these in the context of chemical use.) 	<ul style="list-style-type: none"> <i>The DoF may need to take additional steps to ensure that written prescriptions are prepared for chemical applications.</i> <i>Chemicals are normally applied by licensed applicators who are properly trained and who use the proper protective equipment.</i>
6.6.e	6.6.g	--		
6.7.a	6.7.a, 7.3	Y	<ul style="list-style-type: none"> <i>“Equipment and training necessary” is specified in the indicator.</i> (Formerly encompassed by broader requirements of 6.7.a, and 7.3. Explicit language was likely implicit in understanding.) 	<ul style="list-style-type: none">
6.7.b	6.7.a	--		

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6.7.c	6.7.b, 6.7.a	Y	<ul style="list-style-type: none"> • <i>“Hazardous materials....are stored in designated storage areas” has been added to the indicator.</i> (Other requirements of FSC-US 6.7.c are implicit in the Criterion-level language and 6.7.a). 	<ul style="list-style-type: none"> •
6.8.a	6.8.a	--		
6.8.b	7.3	Y	<ul style="list-style-type: none"> • <i>Biological control agents must be applied by trained workers using proper equipment.</i> (This was formerly encompassed by broader requirements of 4.1.d and 7.3 but auditors will now be required to explicitly address these in the context of biological control agents.) 	<ul style="list-style-type: none"> • <i>Group members do not routinely use biological control agents.</i> • <i>Biological control agents would be applied by properly trained personnel.</i>
6.8.c	Criterion 6.8	Y	<p>Additional requirements include:</p> <ul style="list-style-type: none"> • <i>“Use is documented, monitored, and controlled in accordance with scientific protocols”</i> was addressed in the criterion-level language but not in any indicators of the regional standard. • <i>Written plan including justification, risks, precautions, and monitoring.</i> 	<ul style="list-style-type: none"> • <i>If biological control agents are used, a written plan would be prepared.</i>
6.8.d	Criterion 6.8	--	Prohibition on GMOS not included as an indicator but in practice addressed by CBs based on criterion-level language.	
6.9.a	6.9.b	--		
6.9.b	6.9.b	--		
6.9.c	6.9.d	--		
6.10.a	6.10.a	--		
6.10.b	Criterion 6.10	--		
6.10.c	Criterion 6.10	X	Intent statement on “clear, substantial....benefits” may impose some additional requirements on some FMUs, but likely has been adequately addressed by CBs evaluating conformance to the regional standard.	
6.10.d	Criterion 6.10	Y	<ul style="list-style-type: none"> • <i>Natural or semi-natural stands are not converted to plantations</i> 	<ul style="list-style-type: none"> • <i>Group members do not convert stands to plantations.</i>
6.10.e	--	Y	<ul style="list-style-type: none"> • <i>Justification for conversion included in management plan, and consistent with Criterion</i> 	<ul style="list-style-type: none"> • <i>N/A.</i>

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6.10.f	--	Y	<p>6.3.</p> <ul style="list-style-type: none"> <i>New requirements for conversion outside the control of the owner/manager</i> (maps, consultation, evidence of control – see indicator for details). 	<ul style="list-style-type: none"> <i>Conversions outside the control of DoF are documented in detail. Such conversions are generally related to public works projects, such as new road construction, or utilities.</i> <i>Any conversion of uses by individual group members is subject to review by the District Forester as part of the management plan update and review process.</i> <i>All conversions, whether or not under the control of the DoF or the landowner, are recorded in the management plan.</i>
Principle 7				
7.1.a	7.1.b.4	--		<ul style="list-style-type: none"> <i>C7.1 has Family Forest indicators (forests smaller than 2,471 acres) and large forest indicators (> 2,471 acres). Large forests would have to demonstrate conformance to all indicators in black of the standard. FF indicators (in red) are only applicable to forest management units smaller than 2,471 acres. FF 7.1.a. covers what content is required in FF management plans.</i> <i>If Family Forests conform to black 7.1.a – 7.1.r, that goes beyond what is required in the standard.</i>
7.1.b	7.1.b.3, 6.1.a	Y	<ul style="list-style-type: none"> <i>Forest types and development/size/or successional stages described in management plan</i> 	

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			<p>Note: this is effectively redundant with the new requirement shown at 6.1.a. requiring its inclusion as part of the management plan.</p> <p>History is addressed by LS 7.1.b.3; Natural disturbance regimes are addressed by LS 6.1.a(1); documentation is not explicitly required but would be necessary to determine conformance with LS 6.1.a.</p>	
7.1.c	See Comments column for crosswalk by FSC-US lettered item	--	<p>Lettered outline from FSC-US FM Standard and corresponding regional indicator (no new requirements):</p> <p>a) Current conditions of timber and NTFP: 7.1.b.1. b) Desired future conditions: 7.1.a.2. c) Historical ecological conditions: 6.1.b. d) Management objectives and activities: 7.1.a.1. (“Activities” not specified in the regional standard but are implicit in its the overall requirements.)</p>	
7.1.d	See Comments column for crosswalk by FSC-US item	Y	<p>New requirements:</p> <ul style="list-style-type: none"> • Landscape description • How the landscape scale elements of 6.3 will be addressed. These include (from FSC-US FM Standard 6.3): <ul style="list-style-type: none"> 6.3.b.1. Successional stages: (new) 6.3.a.2. Rare ecological communities: Not explicitly required but implicit in LS 7.1.b.2 (“other ecologically sensitive features”) and LS 7.1.b.6 (“critical habitats”) and documentation required to verify conformance with for 6.1.a. 6.3.a.3. Old Growth. (Old growth is addressed by LS 6.4 but not required to be in the management plan or other documents.) 6.3.b. Animal species and habitat diversity. (LS 7.1.b.1 requires a description of fish and wildlife, but this is a very general requirement that could be met without meeting 	<ul style="list-style-type: none"> • Current management plans cover the topics addressed in the new elements in 7.1.d.

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			<p>the intent of FSC-US FM Standard 7.1.d. 6.3.c. <i>Riparian management zones</i> (LS 6.3.b.1 does not mention riparian habitats and 6.5.b is focused on protecting aquatic habitats and water quality. Not required to be in the management plan or other documents.)</p> <p>Note: parts of this indicator may have been addressed by the regional standard indicators listed, but the regional standard is indicators are sufficiently general in nature that some requirements are likely to be new.</p>	
7.1.e	See Comments column for crosswalk by FSC-US bullet item	See comments	<p>Bullets from FSC-US FM Standard and corresponding regional standard indicator (new requirements in italics):</p> <ul style="list-style-type: none"> • R, T, and E Species: LS 7.1.b.2. Natural communities: Not explicitly required but implicit in LS 7.1.b.2 (“other ecologically sensitive features) and LS 7.1.b.6 (“critical habitats”) and documentation required to verify conformance with for 6.1.a. Note that this is also covered by FSC-US FM Standard 7.1.d –see above) • Plant species and community diversity (new as an explicit requirement, but documentation would be required to verify conformance with LS 6.1.a, 6.2. 6.3, and 6.4 also addressed by FSC-US FM Standard 7.1.d –see indicator and guidance) and wildlife habitats (LS 6.3.a, 7.b.1). • Water resources: LS 6.1.a, 7.1.f, 7.1.h. • Soils: LS 6.1.a, 7.1.f. • Representative Sample Areas: LS Criterion 6.4. • HCVF: LS Principle 9. • Other special management areas: LS Criteria 6.1, 6.2, 6.3, 7.1.b.2, 7.1.b.6, 7.1.h.1. 	

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			<p>Note: Most of these elements were not required in the regional standard Criterion 7.1, but the documentation requirements for the corresponding Criteria (6.1, 6.4, Principle 9) would be sufficient to be considered them to be part of the “management plan” as defined by the FSC.</p> <p>The requirements for natural communities and plant and wildlife habitat diversity appear to be essentially the same as for FSC-US FM Standard 7.1.d.</p>	
7.1.f	--	Y	<ul style="list-style-type: none"> <i>If present, plan must describe invasive species conditions, management objectives, and control methods to be used.</i> 	<ul style="list-style-type: none"> <i>Management plans and related documents describe invasive species management plans.</i>
7.1.g	6.6.c	Y	<ul style="list-style-type: none"> <i>Anticipated outbreak description under certain conditions could be considered to be new.</i> 	<ul style="list-style-type: none">
7.1.h	6.6.f, 6.6.b, 6.6.c	Y	<p>Management plan includes:</p> <ul style="list-style-type: none"> Descriptions of chemicals used and applications: LS 6.6.f. (These would be in site-level prescriptions, which could be considered to be part of the “management plan.”) <i>How the management system conforms with Criterion 6.6.</i> (New language; may be covered in part by 6.6.c and 6.6.d.) <p>This appears to be likely fully addressed by the documentation required for FSC-US FM Standard 6.6.b and 6.6.</p>	
7.1.i	--	Y	<ul style="list-style-type: none"> <i>Plan for use of biological controls consistent with 6.8 now required. Note this is likely redundant with documentation requirements of Indicator 6.8.c.</i> 	
7.1.j	7.1.b.5; Criterion 7.2	Y	The FSC-US FM Standard requires that the “Management plan incorporates the results of social	<ul style="list-style-type: none"> <i>The Umbrella Management Plan for the</i>

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			<p><i>impacts</i>" in a manner that is consistent with language associated with Criterion 7.2. Bullet list below is from new standard followed by corresponding regional indicator; new requirements in italics:</p> <ul style="list-style-type: none"> • Traditional cultural resources and rights of use: LS 7.1.b.4, 4.4.b, Criterion 2.1. • Potential conflicts with customary uses and use rights: LS 7.1.b.4, Criteria 2.2, 2.3, 3.2. • Management of ceremonial, archaeological, and historic sites: LS3.3 and 4.4.b. • Management of aesthetic values: LS 4.4.c, 6.5.b. • <i>Public access to and use of the forest, and other recreation issues:</i> (new). • Local and regional socioeconomic conditions and opportunities: (7.1.b.5). <p>Note: Many of the bullet list items in FSC-US FM Standard 7.1.j are addressed in whole or in part by the current standard.</p> <p>See also FSC-US FM Standard 4.4.a The list of social impacts described in FSC-US FM Standard 7.1.j and 4.4.a are not identical - see comparison table below.</p>	<i>group addresses social impacts, as appropriate for these small, private parcels.</i>
7.1.k	--	Y	<ul style="list-style-type: none"> • <i>Purpose, condition, and maintenance needs of transportation network must be described in the management plan.</i> 	<ul style="list-style-type: none"> • <i>Management plans address the transportation network.</i>
7.1.l	7.1.c.1	Y	<ul style="list-style-type: none"> • <i>Description of how silvicultural system will sustain forest ecosystems is required in the management plan.</i> This may be a somewhat different focus than the current requirement that the systems and prescriptions be based on the integration of ecological and economic characteristics. 	

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7.1.m	7.1.d.1	--		
7.1.n	7.1.e.1	--		
7.1.o	7.1.h.1, Criterion 6.4	--		
7.1.p	7.1.i, 7.1.f, 7.1.i.2	--		
7.1.q	7.1.c.2, 7.1.f, 7.1.h.1, 7.1.i	Y	Plans for site-disturbing activities. Elements not specifically addressed in the regional standard include: <ul style="list-style-type: none"> • <i>Plans required for all significant site disturbing activities.</i> The regional standard is not explicit with this, although it was likely implicitly covered in associated indicators. • <i>Plans for site disturbing activities must include relationship to objectives, outcomes, health and safety objectives, and maps of adequate detail.</i> 	
7.1.r	--	Y	<ul style="list-style-type: none"> • <i>Management plan must describe the stakeholder consultation process.</i> 	<ul style="list-style-type: none"> • <i>The DoF has a stakeholder consultation process for group members and forestry professionals.</i> • <i>As part of the management planning process for individual parcels, District Foresters ensure that stakeholders (e.g., family members) are consulted.</i>
7.2.a	7.2.a	--		
7.3.a	7.3.a	--		
7.4.a	7.4.a	--		
7.4.b	7.4.b	X	Review process for public forests is more explicit in FSC-IS FMS but intent captured by regional standard.	
Principle 8				
8.1.a	8.1.a, 8.1.b	Y	<ul style="list-style-type: none"> • <i>Monitoring protocol must be written.</i> 	<ul style="list-style-type: none"> • <i>DoF conducts a wide range of monitoring activities, including but not limited to FIA and CFI inventories and</i>

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments <i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements. Normal text: comments or additional references	Auditor Comments Based on 2010 Audit
				<ul style="list-style-type: none"> <i>ecological inventories.</i> <i>Monitoring protocols are written, but DoF may need to develop a full list of all written monitoring protocols for future audits.</i>
8.2.a.1	8.2.a.1, 8.1.b.1	Y	<ul style="list-style-type: none"> <i>Timber quality is included in LS 8.2.a.1, which addresses standing inventories of timber, but Criterion 8.2 is limited to yield of products harvested, so the intent of LS 8.2.a.1 is not clear. Possible new requirement.</i> 	
8.2.a.2	--	Y	<ul style="list-style-type: none"> <i>Significant, unanticipated removal or increased vulnerability is monitored and recorded.</i> 	<ul style="list-style-type: none"> <i>Significant, unanticipated removals are recorded.</i> <i>Increased vulnerability is monitored and recorded when the impact is considered a material threat to the forest.</i>
8.2.b	8.2.a.1	X	<ul style="list-style-type: none"> Records of harvested timber and NTFPs must include product and/or grade. Records must be sufficient to ensure that the requirements of Criterion 5.6 are met. (This is new language, but not considered to be an added requirement because under the regional standard landowners would have needed to supply this information to CBs so that they could verify that the requirements of Criterion 5.6 had been met. 	
8.2.c	See Comments column for crosswalk by FSC-US numbered item	Y	<p>Numbered list from FSC-US FM Standard and corresponding regional standard indicator (new requirements in italics):</p> <ol style="list-style-type: none"> R,T, E species and/or habitats: LS 8.2.c.1. Common (new, but also see FSC-US FM Standard 6.1.a.) or rare plant communities and/or habitats: LS 8.2.c.1, but also see FSC-US FM Standard 6.1.a.). Location, presence, and abundance of invasive species (see FSC-US FM Standard 6.3.h.). Condition of protected areas, set-asides, and 	<ul style="list-style-type: none"> <i>DoF periodically monitors habitat conditions for all plants and animals as part of its periodic inventory of forest stand types and stocking levels.</i> <i>The location and status of invasive species is routinely monitored by field foresters.</i> <i>DoF works with the Division of Nature Preserves to monitor the condition of protected areas and set-asides.</i>

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments <i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements. Normal text: comments or additional references	Auditor Comments Based on 2010 Audit
			<i>buffer zones.</i> (new). 5) HCVF: Criterion 9.4.	
8.2.d.1	8.2.d.1, Criterion 8.4	Y	<ul style="list-style-type: none"> Monitoring is conducted to ensure that<i>harvest prescriptions and guidelines are effective.</i> (Effectiveness may be addressed in part by Criterion 8.4, but the intent of FSC-US FM Standard appears to be more specific in nature.) 	
8.2.d.2	8.2.d.1	--	–	–
8.2.d.3	See Comments column for crosswalk by FSC-US indicator requirements	--	<p>List from FSC-US FM Standard, with corresponding regional standard indicator:</p> <ul style="list-style-type: none"> – Socioeconomic issue/social impacts: LS 8.2.d.32(“public responses”), 4.4.a, 4.4.c, 4.5.a, 8.2.d.3. Explicit monitoring is not required for LS 4.4.a, 4.4.c, or 4.5.a, but presumably monitoring evidence has been available to verify conformance during audits and assessments. – Creation or maintenance of quality job opportunities: LS 8.2.d.2. – Local purchasing opportunities: No corresponding regional standard monitoring indicator. Presumably monitoring evidence has been available to verify conformance with LS 4.1.d and 5.2.a. 	
8.2.d.4	8.2.d.2	--		
8.2.d.5	8.2.d.3	--		
8.2.e	8.2.e.1	--		
8.3.a	Criterion 8.3	--		
8.3.b	Criterion 8.3	--		
8.4.a	8.4.a	--		
8.4.b	8.4.a	Y	<ul style="list-style-type: none"> <i>Objectives and guidelines are modified if monitoring shows that they are not sufficient to ensure conformance with the Standard.</i> 	
8.5.a	8.5.a	--		
Principle 9				
9.1.a	9.1.a	Y	<ul style="list-style-type: none"> <i>Old growth definition appears to be more</i> 	<ul style="list-style-type: none"> <i>See discussion above regarding Type 1</i>

FSC-US FM Std. Indicators	Regional Indicators (listed in order of relevance)	Additional Requirement See Notes above	Comments	Auditor Comments Based on 2010 Audit
			<p><i>Bold italic text:</i> Indicates general nature of new requirements– refer indicator language for specific requirements.</p> <p>Normal text: comments or additional references</p> <p><i>inclusive than the regional standard.</i> (See also FSC-US FM STANDARD 6.3.a.3; LS 9.1.a states that old growth is “normally” (i.e. not always) designated as HCVF).</p> <p>Other: FSC-US FM Standard Appendix F also incorporates HCVF guidance and examples from the regional standard.</p> <p>Guidance referenced in the FSC-US FM Standard (data sources listed after 9.1.a and the process outlined in the FSC-US Assessment Framework) in some cases is more explicit than in the regional standard and could result in additional areas identified as HCVF in some cases and on some FMUs (for example, HCV 4, HCV5, and HCV6).</p>	<p><i>and Type 2 old growth.</i></p> <ul style="list-style-type: none"> <i>The DoF collaborated with the Indiana Division of Nature Preserves to screen group member properties for High Conservation Value Forests and Representative Sample Areas (see P&C 6.4).</i> <i>The HCVF/RSA analysis is recent and was based on FSC guidance that was used to develop the current FSC-US Forest Management Standard (i.e., the analysis conforms to current FSC guidance).</i>
9.1.b	9.1.a(3)	--		
9.1.c	9.3.c	--		
9.2.a	Criterion 9.2	Y	<ul style="list-style-type: none"> <i>Stakeholder and expert consultations must also include confirmation that appropriate management options for the maintenance of HCVF have been identified.</i> (FSC-US FM STANDARD clarifies that the intent of Criterion 9.2 is consultation regarding the proposed HCVF locations and attributes after they have been identified by the FME; in the past Criterion 9.2 may have been interpreted to mean consultation any time during the assessment process.) 	
9.2.b	9.1.a(4)	--		
9.3.a	9.3.a	--		
9.3.b	9.3.a, 9.3.b	--		
9.3.c	9.3.d	--		
9.4.a	9.4.a, 9.4.b	--		
9.4.b	9.3.a, 9.3.b	--		

3.2 Stakeholder Comment

The DoF has not received any major stakeholder complaints or disputes since the previous evaluation, and stakeholder consultation by the audit team has not revealed any further stakeholder complaints or disputes.

3.3 Controversial Issues

No exceptionally controversial or difficult issues presented themselves during this surveillance audit.

3.4 Changes in Certificate Scope

There were no major changes in the scope of this certificate during the previous year. A list of current group members was provided to SCS at the time of the annual surveillance audit.