

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

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*Indiana Department of Natural Resources,  
Division of Forestry, State Forest Properties*  
Indiana, USA

## SCS-FM/COC-00099N

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CERTIFIED	EXPIRATION
11/Jul/2012	10/Jul/2017

DATE OF FIELD AUDIT
Oct 19-21, 2015
DATE OF LAST UPDATE
December 21, 2015

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## Foreword

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

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database <http://info.fsc.org/>.

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

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

### Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<http://info.fsc.org/>) no less than 90 days after completion of the on-site audit. Section B contains more detailed results and information for the use by the FME.

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## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Annual Audit Team

<b>Auditor Name:</b>	Paul E. Pingrey	<b>Auditor role:</b>	FSC Lead Auditor
<b>Qualifications:</b>	<p>Paul Pingrey began as an independent auditor for SCS Global Services in 2010. He is an ISO19011 accredited lead auditor for Chain of Custody reviews and forest management reviews. He worked for the Wisconsin Department of Natural Resources for over 35 years, including state and private forest management, state forest tax law supervisor and administration of state forest certification programs. He received a forestry degree from Iowa State University in 1974 and USFS Silviculturist Certification in 1988. Paul has served as the lead FSC Forest Management Auditor in past reviews for Minnesota DNR, Pennsylvania DCNR, Indiana DNR, Menominee Tribal Enterprises (Wisconsin), Johnson Forestry (South Carolina), and the Greenwood Tree Farm Fund (Oregon).</p>		
<b>Auditor Name:</b>	Mike Ferrucci, NSF-International – SFI Lead Auditor, FSC Support Auditor		
<b>Qualifications:</b>	<p>Mike Ferrucci is qualified as a RAB-QSA Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor for Forest Management, Procurement, and Chain of Custody, as an FSC Lead Auditor Forest Management and Chain of Custody, as a Tree Farm Group Certification Lead Auditor, and as a GHG Lead Auditor. Mike has led Sustainable Forest Initiative (SFI) certification and precertification reviews throughout the United States. He has also led or participated in joint SFI and Forest Stewardship Council (FSC) certification projects in nearly one dozen states and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He also co-led the pioneering pilot dual evaluation of the Lakeview Stewardship Unit on the Fremont-Winema National Forest.</p> <p>For 12 years Mike was the SFI Program Manager for NSF – International Strategic Registrations responsible for all aspects of the firm’s SFI Certification programs. In that role Mike developed and managed one of the largest forest and chain of custody certification programs in the U.S.</p> <p>Mike has conducted Chain of Custody audits for all segments of the forest products industry, including printers, corrugated and box producers, integrated paper companies, paper distributors, solid wood mills, engineered wood products facilities, brokers, and distributors. In audits with pulp mills, corrugated producers, and box plants Mike has addressed the issues involving recycled content. Mike has also conducted or participated in assessments of forest management operations throughout the United States, with field experience in 4 countries and 33 states.</p> <p>Mike Ferrucci has 35 years of forest management experience. His expertise is in sustainable forest management planning; in certification of forests as sustainably managed; in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis</p>		

	on regeneration and management of native hardwood species. Mike has conducted or participated in assessments of forest management operations throughout the United States, with field experience in 4 countries and 33 states. Mike has been a member of the Society of American Foresters for over thirty-five years. He is Past Chair of the SFI Auditor’s Forum. Mike is also a Lecturer at the Yale School of Forestry and Environmental Studies, where he has taught graduate courses and workshops in forest management, harvesting operations, professional forest ethics, private forestry, and financial analysis.
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## 1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	3
B. Number of auditors participating in on-site evaluation:	2
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
<b>D. Total number of person days used in evaluation:</b>	<b>9</b>

## 1.3 Standards Employed

### 1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard	1-0	July, 2010
All standards employed are available on the websites of FSC International ( <a href="http://www.fsc.org">www.fsc.org</a> ), the FSC-US ( <a href="http://www.fscus.org">www.fscus.org</a> ) or the SCS Standards page ( <a href="http://www.scsglobalservices.com/certification-standards-and-program-documents">www.scsglobalservices.com/certification-standards-and-program-documents</a> ). Standards are also available, upon request, from SCS Global Services ( <a href="http://www.SCSGlobalServices.com">www.SCSGlobalServices.com</a> ).		

## 2 Annual Audit Dates and Activities

### 2.1 Annual Audit Itinerary and Activities

Audit dates	Oct 19 – Oct 21, 2015	
<b>Date</b>	<b>Activity</b>	<b>Notes</b>
<b>Monday Oct. 19</b>		
8-10 am	Clark State Forest 2 Service DR Henryville, IN 47126	Opening Meeting
10 am to 5 pm	Clark State Forest	Field Sites (see notes, below)
<b>Tuesday Oct. 20</b>		
8-9 am	Harrison-Crawford State Forest 7240 Old Forest Rd. SW Corydon, IN 47112	Opening Meeting
9 to 5	Harrison-Crawford State Forest	Field Sites
<b>Wednesday Oct. 21</b>		
8-10 am	Harrison-Crawford State Forest	Field Sites
10 am – 1 pm		Central Office and Multi-site Requirements
1 pm	Final Issues/Deliberations	Audit Team (privately)

2 pm	Closing Meeting	
3:30 pm	End of Audit	

**Indiana State Forests – Field Site Notes**

**Clark State Forest – Oct 19, 2015**

1. Invasive Control Site. A walnut plantation was established in the 1980s when this property was being managed as a tree nursery. About 25% of understory became occupied by invasive autumn olive shrubs. The stems were cut and the stumps treated with Glyphosate in early summer, with 95% or more control. Reviewed process to developing and implementing the prescription, including environmental protections, worker use of PPE, and training of resource foresters.
2. Active timber harvest Number 6301401 in Compartment 7, Tract 8. Most of area is receiving a light “selection” thinning, with scattered openings where most trees were cut. Interviewed timber producer who owns the logging company, operates the loader, and has the required training. PPE use not specifically required by state, although emphasized during inspections. Observed information sign, rocked entrance road preventing mud from reaching highway, visual buffer with light to no cutting along public road, minimal residual stem damage except in one area, limited rutting, effective sale administration including regular inspections and completion of inspection form.
3. Clark State Forest Horse Camp, expansion project. Investing \$250,000 in central comfort station and similar amount for campground expansion. State Archeologist described use of “shovel holes” in a 5-meter grid sampling pattern to look for cultural resource evidence such as glass, pottery, stone tools, etc. prior to site disturbance. Chief State Forester explained the economic analysis behind the decision to invest in recreation infrastructure expansion on this site. One of the Forestry Divisions goals is to diversify the income stream from State Forests. He also explained how state personnel and prison labor is used to significantly hold down cost of construction.
4. White Oak Nature Preserve. Example of a representative sample area (white oak-dominated mature forest) that is managed by the Indiana Division of Nature Preserves within the State Forest. Invasive species control is the primary activity, although other actions could include prescribed fire. Observed encroachment by beech and sugar maple in understory and trailhead sign-in station, trail, and footbridge.
5. Completed Sale 6301301 in Compartment 8, Tract 11 including areas of selection thinning and regeneration openings. Confirmed that openings have dense, thriving regeneration that is dominated by tulip-poplar with many other mixed-hardwood species, some invasive *Ailanthus altissima* and scattered but likely competitive oak seedlings and very competitive oak stump sprouts. Policy is to conduct regeneration monitoring three years after openings are created, but staff vacancies have led to challenges implementing. There are also CFI plots that can include regeneration openings. A large, old culvert has been stranded in the intermittent stream at the crossing.
6. Completed Sale 630152 in Compartment 12, Tract 9 cut in early summer of 2015. Tract plan describes three types, with 9 acres of openings mostly in the Virginia-pine type on the upper flats to regenerate, and light selection thinning of the hardwood and oak-hickory types on slopes. A large uncut buffer protects the intermittent stream, and two old home sites were also protected using buffers or careful selective tree harvest under direct observation by forester.

**Harrison Crawford State Forest – Oct 20-21, 2015**

1. Tract 2104. Before the audit team was able to enter the tract, the State Forester was approached at the gate by a neighbor wanting to make a point about his right to use a horse trail. The forester listened and noted the complaint. The team drove into the tract and noticed that the forest road is being used as an extension of an ATV trail coming from adjoining neighbor's land. (Conservation Officer informed the auditor later that the neighbor has a disabled hunter permit and sometimes drives an ATV on the forest road.) Audit team went in about a half mile to a harvest opening that had received TSI treatment. Part of the group walked through the regen area (found some oaks and lots of other hardwood saplings), and the rest walked with the Wildlife Biologist and discussed ongoing Indiana bat monitoring surveys. Biologist uses acoustic recorders to count bats via software analysis. We arrived at a dug pond where Biologist said he finds high numbers of bats. He'd like to use ponds as a bat mitigation strategy, but USFWS doesn't recognize them.
2. Tract 2301. Visited another completed harvest/TSI by walking in on the "Adventure Trail", a 25-mile three-day hiking loop. The TSI work had focused on removing unwanted beech, ailanthus, paulownia and invasive grasses. During the walk, the Forestry Archeologist described services she provides. She logs about 150 data requests from Classified Forests and 100 data requests from State Forests per year. For Classified Forests, she does a database check only and reports any hits back to the foresters. For State Forest activities, she both checks the archeology database and does a site inspection prior to new soil disturbing management. We also talked about stakeholder outreach efforts to Native American tribes. She said that she is working with DNR's Division of Historic Preservation and Archeology on re-establishing a Native American consultation committee that became inactive during the last governor's administration. Other efforts to communicate with tribes in relation to the Forestry Strategic Plan development have occurred with no response.
3. Fire Road 502. Well-maintained forest road. State Forester/Road Specialist explained how seasonal logging restrictions (due to bats and other issues) have forced more winter logging when conditions are wetter. Roads have been improved to handle to wet-weather traffic and to accommodate semi-trailer length logging trucks. State Forester received logging road construction training in college. That, plus a lot of practical experience, have qualified him as the main road construction expert. He trains other State Forest personnel on road techniques.
4. Turkey Ridge Fire Trail 301. Switched to a minimum-maintenance road also used as an equestrian trail. Discussed equestrian impacts on road.
5. Timber Sale 6341302. Looked at a completed individual selection – group selection harvest. Assistant Forester guided us to old logging skidder trails to show water diversions and road close-out efforts. Discussion turned to post-sale audits used to count stumps and verify that the final harvest conformed to the sale contract. Ten percent of closed sales are inspected annually in audits. The audits are intended to deter illegal cutting and avoid any allegations that foresters might be allowing loggers to take additional trees on the side.
6. "Indian Creek Shelter" overlook lunch site. Open-door, primitive camping shelter on "Adventure Trail".
7. Timber Sale 6341501. State Forester showed us a marked (inactive) harvest in large mature oak-mixed hardwood stand. Site had sinkhole type depressions. Noted a few 40-inch diameter trees, some of which were left to grow. Forester explained his marking technique and order of

- removal. Discussion at the site about silvicultural prescription terminology. Although the foresters describe the work here as a type of selection cutting, they are in fact doing modified shelterwood harvests and understand their methods as a variation of even-aged management.
8. Stopped at another post-harvest TSI site. Noted good retention of snags and shag-bark hickory trees. Disturbed soil near the landing had a surprising number of sycamore seedlings, but foresters said they are not likely to last long.
  9. Cold Friday Cemetery. State Forester explained the history of the site, including a pre-Depression era settlement, church and school. Archeologist described a Phase 1 inventory she had completed of all cemeteries on State Forests (GPS location, basic history, photographs of tombstones). She will have summer interns assist with a more detailed Phase 2 inventory, including logging individual markers and doing a deed search to discover who actually owns the land. All cemetery work is done in cooperation with DHPA.
  10. Post Oak-Cedar Nature Preserve. In Indiana, post oaks occur almost exclusively in the southern third of the state. Their leaves are said to resemble a Maltese cross (some people call the tree the crucifixion oak). The preserve has a short loop trail with numbered stations. Observed how prescribed burning is being used to maintain/improve the post-oak forest (an example of active management of an HCVF site). Tract was one of Indiana's first nature preserves. Property is adjacent to O'Bannon Woods State Park. Noted that a number of karst caves in the area are closed to public access due to white-nose syndrome bat disease spread risk.
  11. Wyandotte Lake/wetland impoundment near Blue River. Stakeholders requested that the lake be drained and dredged during recent strategic plan meeting. Chief State Forester says work would be very expensive (\$100,000+ for materials alone). With a limited Forestry budget, restoring this lake is not a top priority. The Division will, however, respond to stakeholder comments in the strategic plan.
  12. Leavenworth Barrens/Glades Nature Preserve. Remnant barrens occur in isolated and widely separated spots throughout a 700 acre woodland-prairie preserve on the State Forest. The "barrens" openings are relatively small, and inter-mixed with hardwood forests that are also being managed with fire. DNR has some trouble from neighbors who object to smoke from the Rx burns. Discussion at the site about what ecological assessment/justification was used to dedicate the property for nature preserve use.
  13. Sale #6341406. Active harvest suspended through summer months per program to avoid potential impacts to Indiana bats. Compartment 19, Tract 5; Compartment 26, Tracts 02 and 03. A very visible harvest bordering the state park's campground access road and several recreation trails. Marking and completed harvesting assessed to be high quality with no issues.
  14. Timber Harvest Interpretive Trail. The trail has numbered stations and a brochure that provides clear explanations of various facets of forest ecology, management, and harvesting. Timber Harvest Self-Guided Tour signs and informational kiosks are professional and informative.
  15. Fox Hollow Fire Trail/Horse Trail/Wagon Route. The steep portion of this trail has a considerable amount of surface erosion and gulying. Managers described considerable rain events in the first half of the summer, and challenges maintaining the water control structures.
  16. Twin Chimney historic home site foundation adjacent to Twin Chimney's Horse Trail. Ruins of a farmhouse built in the 1860s but which burned down a hundred years ago. Forestry Archeologist described plans to protect and rehabilitate the site. Currently, large trees are

growing out of the cellar foundation and stone work is crumbling. State Forester said that plans for the site will be discussed at the annual open house and public input taken.

17. [Indiana Tree Project](#) planting site (Fox Hollow Wildlife Management Area). The project mentioned in the State Forest Strategic Plan encourages people to donate \$10 to plant a tree to, “help wildlife, prevent soil erosion, support our state’s largest agricultural industry, and help bring back natural beauty to our state.” This old field and was planted to oaks and other hardwoods last spring. A small pond on the site was the source of fill material for a State Forest shop construction. Forestry Archeologist said that the site was carefully examined for artifacts before any soil disturbance was allowed.
18. Compartment 19, Tract 08. 2015 TSI area. Harvested in 1989 and again in 2012. Confirmed effective general TSI and small area of more intensive understory control. Forester explained how she administered the TSI contract and required the consulting forester to come back and remove tops of trees he felled from a hiking trail.
19. Fox Hollow Disabled Hunter Trail, flat portion near Fox Hollow WMA. Trail/road here is in very good condition, water management structures functioning.

## 2.2 Evaluation of Management Systems

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

## 3. Changes in Management Practices<sup>1</sup>

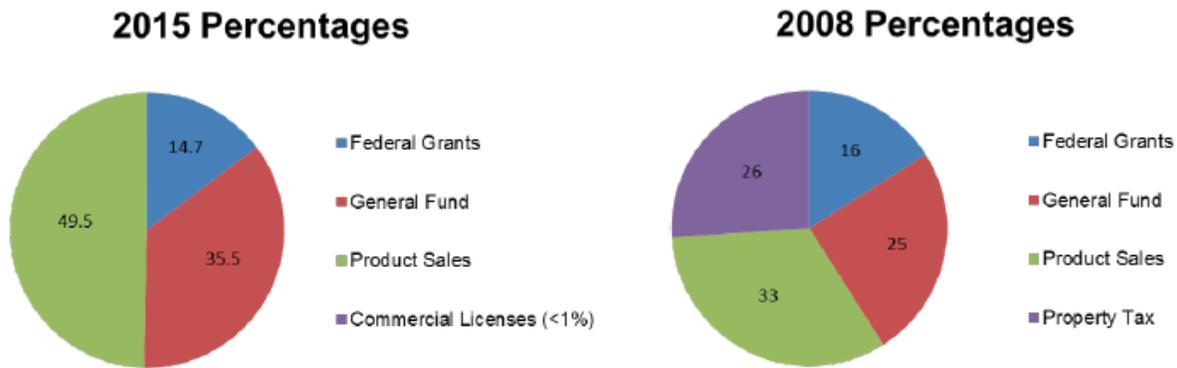
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Background: **The Indiana state forest system consists of 13 State Forests and 2 State Recreation Area properties containing 158,300 acres.** This system was started in 1903 and was one of the first in the country. The state forests were initially created to restore eroded, worn-out land when small subsistence farms began to be abandoned early in the century. Early state forest management focused on reforesting eroded area, creating wildlife habitat, demonstrating good forest land management, providing public recreation, and conserving forest resources. The Division of Forestry is currently the only Indiana DNR Division that incorporates an active timber resource management program. Other DNR landholding divisions manage an additional 363,346 acres of state land not included in the scope of the FSC certificate.

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<sup>1</sup> Adopted from the DIVISION OF FORESTRY STRATEGIC DIRECTION 2015-2019

### Forestry Division Funding



Funding sources have changed significantly since 2008. About half of the Division of Forestry’s funding comes from sales of nursery and forest products and user fees. Approximately 35.5% of funds come from the State’s general fund. The historic forestry property tax, which formerly was a primary revenue source for Forestry programs, was abolished by the State Legislature in 2008. Federal grants are used for private landowner assistance, fire and community and urban forestry programs, but no federal funds are used for management of State Forest Properties.

This year the Division of Forestry received authorization from the Executive Branch to proceed with updating the Forestry Strategic Plan. The Indiana process entailed DoF drafting the plan, review of the draft plan by the DNR Executive Office with approval to seek public input, and DoF conducting public meetings and inviting online input, which closed Oct 31. Pending actions include DoF response to stakeholder comments, adjustments to the plan and final review by the Executive Branch. Fee proposals in the plan will also be taken to the Indiana Natural Resources Commission (NRC) for approval.

The proposed plan includes four strategic goal areas:

1. Forest Resource Stewardship (Active Forest Management and Protection/Improvement of Wildlife Habitat, Cultural Resources, High Conservation Value Areas)
2. Land Ownerships and Acquisitions
3. State Forest Recreation
4. Communications and Administration

A few highlights that are getting attention from stakeholders include:

- Managing to achieve habitat diversity and balance of older and early successional forest (i.e., actively harvest timber).
  - Diversity goal: 10% older forest, 10% early successional
  - Average regeneration harvest area 2013-14: 3.2 acres (6.7% of harvested area)

- Managed harvests to remain at current levels (14 million board feet per year, as established in the 2008 plan at about four times previous harvest level). See annual harvest chart, below.
- Acquiring lands of strategic importance from willing sellers (1,500 acre goal) and identify non-essential lands for possible divestment.
- Developing a system wide recreation plan, identifying State Forests with greatest potential for improved recreation opportunities, upgrading camping facilities and infrastructure, maintaining dams for lakes, and continuing camping cabin project with Dept. of Corrections (adding 6-12 new cabins/year).
- Expand fee use areas and develop an entrance pass system for all State Forests.



A number of the proposed directions are aimed at increasing and diversifying income sources to support State Forestry programs. Harvest levels, new user fees and incentive recreational development are generating public discussion.

## 4. Results of the Evaluation

### 4.1 Existing Corrective Action Requests and Observations

<b>Finding Number: 2014.1</b>		
<b>Select one:</b>	<input type="checkbox"/> Major CAR	<input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation
<b>FMU CAR/OBS issued to</b> (when more than one FMU):		

<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US Forest Management Standard 6.5.c
<b>Background</b> (or Background/ Justification in the case of Observations):	
Indicator 6.5.c requires that “management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance.” The DoF rutting guidelines designed to protect soil resources allow for continued hauling and skidding as long as the ruts can be smoothed so that they do not exceed 18” in depth. This guideline alone may not be effective at preventing root damage, changes in hydrology, and compaction that often occur when ruts are being made. Smoothing of ruts does not alleviate the root damage, compaction, and changes to hydrology associated with rutting.	
<b>Corrective Action Request</b> (or Observation):	
DoF should consider implementing revised rutting guidance that better protects soil and water resources.	
<b>FME response</b> (including any evidence submitted)	DoF has drafted revised rutting guidance and is in process of training (9/30/2015) of the proposed guidelines and finalizing guidance by December 31, 2015.  See draft guidelines document.
<b>SCS review</b>	DNR initiated a process to strengthen soil compaction and rutting guidelines, which are still in draft form. Some State Forest staff have been trained regarding new expectations, but others including timber producers have not. The Observation shall be carried over to track continuing progress.
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2014.2</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US Forest Management Standard 7.2.a
<b>Background</b> (or Background/ Justification in the case of Observations):	
Indicator 7.2.a. requires that the “management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.” DoF is operating on year 6 of a 5 year Strategic Plan (2008-2013). DoF has not yet received approval from the administration to complete and begin implementing the draft plan (2014-2019) and is thus operating under default	

extension of the 2008-2013 plan. While the direction of the 2008-2013 is still largely relevant, the objectives related to acquisition are no longer applicable as overall funding for DoF has diminished and timber sale revenue is needed for general operations.	
<b>Corrective Action Request (or Observation):</b> If DoF is unable to finalize and implement the draft Strategic Plan (2014-2019), it should consider formally extending the current plan and notifying the public that they are operating under an extension of the five year that expired in 2013.	
<b>FME response (including any evidence submitted)</b>	The 2015-2019 Strategic Plan has been approved and public comments accepted until October 31, 2015 at which time all comments will be reviewed and plan changes considered.
<b>SCS review</b>	The Division of Forestry received authorization from the Executive Branch to proceed with updating the Forestry Strategic Plan. The Indiana process entailed DoF drafting the plan, review of the draft plan by the DNR Executive Office with approval to seek public input, and DoF conducting public meetings and inviting online input, which closed Oct 31. Pending actions include DoF response to stakeholder comments, adjustments to the plan and final review by the Executive Branch. Fee proposals in the plan will also be taken to the Indiana Natural Resources Commission (NRC) for approval. Observation to be kept open to continue tracking progress, including responses to stakeholder input.
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above)

## 4.2 New Corrective Action Requests and Observations

<b>Finding Number: 2015.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to (when more than one FMU):</b>	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	3.3.a
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> This indicator requires that the forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance. In May of 2007, DOF sent letters to federally recognized and unrecognized tribes with ancestral connections to the State of Indiana. The letter had a cultural emphasis. No responses were received regarding the identification of sites of current or traditional cultural, archeological, ecological, economic or religious significance. Interviews with DoF staff indicate that no recent communications strategies with tribes have been attempted, although DoF and DNR's Division of Historic Preservation and Archeology are planning to reconvene a tribal outreach council that the previous administration had allowed to become inactive.	

<b>Corrective Action Request (or Observation):</b> DoF conformance with indicator 3.3.a would be strengthened through renewed tribal outreach.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2015.2</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to (when more than one FMU):</b>	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	4.1.c
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> Interviews indicate that in comparison with the other 18 members of the <a href="#">Northeastern Area Association of State Foresters</a> , Indiana DoF rates in the lower third in terms of wages. The lack of competitive pay for foresters (especially at the entry level) is causing an unsustainable situation where new employees are leaving nearly as fast as they are hired and trained. A DoF administrator said that 21 vacant forester positions were filled in the past five years and 21 young foresters left state employment during the same timeframe. Five of the newly vacated positions are currently unfilled as part of a budget-balancing policy. A few of the new hires have stayed, other positions being re-filled as many as three times, which may increase training and hiring costs. DoF is characterized, however, by senior staff and many relatively new hires with few foresters in the middle. That could be problematic as senior staff retire.	
<b>Corrective Action Request (or Observation):</b> Conformance with indicator 4.1.c could be strengthened if DNR were to improve pay and benefits sufficient to retain new hires.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2015.3 (carryover of OBS 2014.1)</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	6.5.c
<p><b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Indicator 6.5.c requires that “management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance.” The DoF rutting guidelines designed to protect soil resources allow for continued hauling and skidding as long as the ruts can be smoothed so that they do not exceed 18” in depth. This guideline alone may not be effective at preventing root damage, changes in hydrology, and compaction that often occur when ruts are being made. Smoothing of ruts does not alleviate the root damage, compaction, and changes to hydrology associated with rutting.</p> <p>DNR initiated a process in 2015 to strengthen soil compaction and rutting guidelines, which are still in draft form. Some State Forest staff have been trained regarding new expectations, but others including timber producers have not. The Observation shall be carried over to track continuing progress.</p>	
<p><b>Corrective Action Request</b> (or Observation): DoF should consider implementing revised rutting guidance that better protects soil and water resources.</p>	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2015.4</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	6.5.d

<b>Non-Conformity</b> (or Background/ Justification in the case of Observations):	
Although sites visited in 2015 demonstrated good to excellent main haul roads (upgraded in recent years to handle more wet-weather traffic and larger log trucks), auditors observed some rutting and erosion on recreational trails, especially those open for equestrian use (e.g., Turkey Ridge Fire Trail 301, Fox Hollow Fire Trail/Horse Trail/Wagon Route).	
<b>Corrective Action Request</b> (or Observation):	
Continued conformity with this indicator could be strengthened through improvement in the maintenance of recreational trails which are placed on forest access roads or fire trails, consistent with Indiana BMP Guide page 15: "Insure that all erosion control and water management measures (e.g. water bars, drainage dips, culverts and ditches) are working."	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2015.5</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	6.6.a
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations):	
DoF uses the following pesticides on the FSC HHP list (2007 and 2015) for bedbug control/prevention in State Forest recreation cabins:	
Suspend SC    Deltamethrin	
Tempo SC    Beta-cyfluthrin; 1,2-Propanediol	
Transport    Bifenthrin; acetamiprid	
Temprid SC    Imidacloprin; beta-cyfluthrin	
While these pesticides may be legally labelled and appropriate for this use, their use is not allowed under the terms of FSC certification without a duly-approved derogation.	
<b>Corrective Action Request</b> (or Observation):	
Organization must immediately cease use of the banned bedbug pesticides on the old HHP list or excise the cabin sites from the scope of the FSC certificate.	
<b>FME response</b> (including any evidence submitted)	

<b>SCS review</b>	FME has excised the cabin sites from the scope of the certificate as described in section 7 of this report. No derogation is required at this time as those areas are now outside of the scope of the FSC certificate.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2015.6</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): June 30, 2106
<b>FSC Indicator:</b>	6.6.a
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): DNR reported use of copper sulfate for lake algae control. That product was added to the HHP list in 2015.	
<b>Corrective Action Request</b> (or Observation): For products added to the HHP list in 2015, either discontinue use of prohibited HHP chemicals or obtain FSC-approved derogations by June 30, 2016.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2015.7</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	7.2.a

<b>Non-Conformity</b> (or Background/ Justification in the case of Observations):	
Indicator 7.2.a. requires that the “management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.” DoF is operating on year 7 of a 5 year Strategic Plan (2008-2013).	
In early 2015, the Division of Forestry received authorization from the Executive Branch to proceed with updating the Forestry Strategic Plan. The Indiana process entailed DoF drafting the plan, review of the draft plan by the DNR Executive Office with approval to seek public input, and DoF conducting public meetings and inviting online input, which closed Oct 31. Pending actions include DoF response to stakeholder comments, adjustments to the plan and final review by the Executive Branch. Fee proposals in the plan will also be taken to the Indiana Natural Resources Commission (NRC) for approval.	
<b>Corrective Action Request</b> (or Observation):	
Continue work to complete and implement the proposed Division of Forestry Strategic Direction 2015-2019, including response to stakeholder input and final review by the DNR Executive office.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

## 5. Stakeholder Comments

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

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

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

### 5.1 Stakeholder Groups Consulted

FME Management and staff	Local and regionally-based environmental
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	organizations and conservationists
Purchasers of logs harvested on FME forestlands	Forest industry groups and organizations
Contractors	Local, state, and federal regulatory agency personnel
Local and regionally-based social interest and civic organizations	

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

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

<input type="checkbox"/> FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.	
Stakeholder comments	SCS Response
<b>Economic concerns</b>	
Based on comments in the media, Indiana’s planning process that vests drafting and review in the elected Executive Branch and Governor-appointed NRC troubles some interest groups that would like more direct involvement in all phases of plan development and review.	<p>On Oct 31, 2015, DoF completed the public input phase of its Forestry Strategic Directions process, including three public meetings and comments using an online web form. Stakeholder input had not been summarized at the time of the 2015 FSC field audit, but DNR will be responding to all input and making adjustments to the plan before returning to DNR Executive Office for final approval.</p> <p>Although some stakeholders may not be satisfied with the process, the FSC standard does not prescribe how an organization obtains public input.</p> <p>Note: SCS invited external stakeholder input prior to the annual audit, but no direct communications were received.</p>
<b>Social concerns</b>	
<b>Environmental concerns</b>	

## 6. Certification Decision

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

strengths:

The State Forest BMP monitoring program is strong, with post-harvest BMP reviews conducted by Indiana Division of Forestry Resource Foresters and by a comprehensive second-party process.

Indiana Division of Forestry employs a full-time wildlife biologist. His time is focused on special situations and on the HCP effort for the Indiana bat and the Northern long-ear bat, but he also provides support for regular work activities. The Indiana Division of Forestry has dedicated considerable resources to developing state-of-the-art bat conservation practices.

The Indiana Division of Forestry has an exceptional program to retain stand-level wildlife habitat elements in accordance with scientific information.

Indiana Division of Forestry provides excellent recreational opportunities for the public including walking and horse trails, camping and access to lakes and ponds.

Indiana Division of Forestry employs a full-time archeologist. She has developed an exceptional program for identifying and managing culturally important sites.

Annual “State Forest Open Houses” and a comprehensive web site contribute to public involvement in public land management and planning.

The Division of Forestry has a good program for mentoring new forestry hires, including frequent oversight by central office experts.

State Forest specialists have made significant improvements to main haul roads for handling wet-weather traffic and larger logging trucks.

The Division of Forestry is doing an exceptional job restoring and maintaining State Forest offices, shops and recreational facilities, many of which have historical significance.

## 7. Changes in Certification Scope

Any changes in the scope of the certification since the previous audit are highlighted in **yellow** in the tables below.

### Name and Contact Information

<b>Organization name</b>	Indiana DNR, Division of Forestry		
<b>Contact person</b>	Brenda Huter		
<b>Address</b>	Indiana Department of Natural Resources Division of Forestry 402 W. Washington, Room W-296 Indianapolis, IN 46204 USA	<b>Telephone</b>	317-232-0142
		<b>Fax</b>	317-233-3863
		<b>e-mail</b>	bhuter@dnr.in.gov
		<b>Website</b>	<a href="http://www.in.gov/dnr/forestry">www.in.gov/dnr/forestry</a> <a href="http://www.inforestryx.com">www.inforestryx.com</a>

**FSC Sales Information**

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

**Scope of Certificate**

<b>Certificate Type</b>	<input checked="" type="checkbox"/> Single FMU		<input type="checkbox"/> Multiple FMU	
	<input type="checkbox"/> Group			
<b>SLIMF (if applicable)</b>	<input type="checkbox"/> Small SLIMF certificate		<input type="checkbox"/> Low intensity SLIMF certificate	
	<input type="checkbox"/> Group SLIMF certificate			
<b># Group Members (if applicable)</b>	N/A			
<b>Number of FMU's in scope of certificate</b>	N/A			
<b>Geographic location of non-SLIMF FMU(s)</b>	Latitude: W 86 degrees 10 minutes Longitude: N 39 degrees 46 minutes			
<b>Forest zone</b>	<input type="checkbox"/> Boreal		<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical		<input type="checkbox"/> Tropical	
<b>Total forest area in scope of certificate which is:</b> Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac				
privately managed	0			
state managed	157,686			
community managed	0			
<b>Number of FMUs in scope that are:</b>				
less than 100 ha in area	0	100 - 1000 ha in area	0	
1000 - 10 000 ha in area	0	more than 10 000 ha in area	1	
<b>Total forest area in scope of certificate which is included in FMUs that:</b> Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac				
are less than 100 ha in area	0			
are between 100 ha and 1000 ha in area	0			
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0			
<b>Division of FMUs into manageable units:</b>				
The Division of Forestry (DoF) is a unit of the Department of Natural Resources, a state agency within the executive branch of the Indiana state government. DoF divides the FMU into State Forests. Each State Forest is then divided into tracts that are the units upon which all forest management activities are based.				

**Production Forests**

<b>Timber Forest Products</b>	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	157,686
Area of production forest classified as 'plantation'	0

Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	23
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	626
<b>Silvicultural system(s)</b>	<b>Area under type of management (2014 accomplishments)</b>
Even-aged management	196
Clearcut (clearcut size range )	196
Shelterwood	0
Other:	0
Uneven-aged management	5,640
Individual tree selection	5,210
Group selection	430
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	N/A
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	24,700,000 BF
<b>Non-timber Forest Products (NTFPs)</b>	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
<b>Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:</b>	
<p>Current Target of 14 million board feet is determined based on desire for a conservative harvest level until growth information is more-fully updated. The allocation of this harvest to the individual units is proportional. The general approach to timber harvest allocation by property is described on page 33 of the Environmental Assessment.</p> <p>A continuous forest inventory where 1/5 of the land base is inventoried each year is in the 8<sup>th</sup> cycle. After the 5th year was completed, DOF started to re-measure the plots allowing for growth computation. The system design is based on 10 years to develop a reliable growth estimate. The current growth estimate is based on 3 methods: 1) 50 FIA plots on state forests from which growth can be calculated, 2) 2005 system-wide inventory is compared to the inventories done in the 1980s and 3) Increment borings were collected during the 2005 SWI and growth was estimated using the Burrel-Ashley system. All 3 estimates of net annual growth are about 28 million bf; and so the cutting budget is set at 60%of that growth rate.</p>	
<b>Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i></b>	
<p>Quercus spp. Oaks: white, red, black, scarlet, post, bur, swamp chestnut, swamp white, chestnut, chinkapin, shingle, black jack, cherry bark, pin,shumard</p> <p>Liriodendron tulipifera (yellow-poplar)</p> <p>Acer spp (Maple: sugar, red, black,silver, boxelder)</p> <p>Carya spp (Hickory:bitternut,mockernut,shagbark, red, pignut)</p>	

Fraxinus spp. (Ash: white, green, pumpkin, black, blue)
Pinus spp(Pine:white, red, Scotch, Virginia, shortleaf)
Juniperus virginiana (red cedar)
Sassafras alfidum (sassafras)
Plantanus occidentalis (sycamore)
Liquidamber styraciflua (sweet gum)
Ulmus spp. (elms)
Celtis occidentalis (hackberry)
Juglans nigra (black walnut)
Fagus grandifolia (American beech)
Tilia Americana (basswood)
Populus spp. (large-toothed aspen, quaking aspen, cottonwood)
Prunus serotina (black cherry)
Gleditsia triacanthos (honey locust)
Gymnocladus dioica (Kentucky coffee-tree)
Robinia pseudoacacia (black locust)
Nyssa sylvatica (black gum)
Aesculus spp (Ohio,yellow)
Catalpa speciosa (Catalpa)

**FSC Product Classification**

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough Wood	W1.1 Roundwood	All
W1 Rough Wood	W1.2 Fuelwood	All
W3 Wood in chips or particles	W3.1 Wood chips	All
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species

**Conservation Areas**

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives		2018 ac
High Conservation Value Forest/ Areas		
High Conservation Values present and respective areas:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Code	HCV Type	Description & Location
<input checked="" type="checkbox"/> HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Virginia Pine-Chestnut Oak, Clark SF, (19.4 A) Alum Cave Hollow, Clark SF, (164.2 A) Batwing Cave, Harrison-Crawford SF, (10.5 A)
		Area
		495.4 ac

			Deam's Bluff, Harrison-Crawford SF, (251.9 A) Scout Ridge, Morgan-Monroe SF, (15.1 A) Crooked Creek, Yellowwood SF, (34.3 A)	
<input type="checkbox"/>	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
<input checked="" type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	White Oak , Clark SF,(133.7 A) Post Oak-Cedar, Harrison-Crawford SF, (275.5 A); Scout Mountain, Harrison-Crawford SF, (47.7 A) Leavenworth Barrens, Harrison-Crawford SF, (747.5 A) Blue River Gravel Wash Barrens, Harrison-Crawford SF, (77.6 A) Indian Bitter, Jackson-Washington SF, (36.7 A) Knobstone Glades, Jackson-Washington SF, (58.8 A) Henshaw Bend, Martin SF, (82.5 A) Tank Spring, Martin SF, (62.9 A) Low Gap, Morgan-Monroe SF,(320 A) Miller Ridge, Yellowwood SF, (30.6 A)	1,873.5 ac
<input type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
<input type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
<b>Total Area of forest classified as 'High Conservation Value Forest/ Area'</b>				<b>2,018 ac</b>

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

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input checked="" type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
<b>Explanation for exclusion of FMUs and/or excision:</b>	The Division of Forestry wishes to remove the developed campground areas at Starve Hollow State Recreations Area, Deam Lake State Recreation Area, and Greene-Sullivan State Forests. These areas have family cabins. The cabins are under and integrated pest management for bed bugs. Heat treatments and insecticides are used. Several of the most effective bedbug insecticides are not allowed under FSC. All applications occur within the cabins.	
<b>Control measures to prevent mixing of certified and non-certified product (C8.3):</b>	The Division of Forestry has developed maps delineating the excised areas. Probability of a timber sale in the excised areas is low: high recreation use, low timber value due to risk of imbedded material, poor form, species with low value in area. Any removed trees would either be used for internal use (wood heating) or in the case of a salvage sale the excised area would be sold separately (uncertified) from the remainder of the State Forest property. Boundaries of sale area would be marked.	
<b>Description of FMUs excluded from or forested area excised from the scope of certification:</b>		
<b>Name of FMU or Stand</b>	<b>Location (city, state, country)</b>	<b>Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)</b>
Starve Hollow State Recreation Area, Jackson- Washington SF	Vallonia, IN, USA	11 acres
Deam Lake State Recreation Area, Clark SF	Borden, IN, USA	73 acres
Greene-Sullivan SF	Dugger, IN, USA	30 acres

**8. Annual Data Update**

**8.1 Social Information**

<b>Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):</b>		
# of male workers: 120	# of female workers: 26	
<b>Number of accidents in forest work since last audit</b>	<b>Serious: # 0</b>	<b>Fatal: # 0</b>

**8.2 Annual Summary of Pesticide and Other Chemical Use**

<input type="checkbox"/> FME does not use pesticides.				
<b>Commercial name of pesticide / herbicide</b>	<b>Active ingredient</b>	<b>Quantity applied annually (kg or lbs)</b>	<b>Size of area treated during previous year</b>	<b>Reason for use</b>
Alecto, Aquapro, Roundup, Nufarm	glyphosate	76 gallons	280 acres	Invasive species control; general

Credit Extra, Gly Star Plus; Razor; RazorPro; Mad Dog Plus, Rodeo; Farmworks 41% Glyphosate				weed control; TSI
Poast, Poast Plus	sethoxydim	32 gallons	39	Invasive species control/general weed control
Tordon RTU	Picloram, 2,4D	1.8 gallons	77	TSI
Arsenal	Imazapyr	0.18 gallons	.25	TSI, Invasive species control
Element 4, Garlon 4, Element 3A	triclopyr	29.3 gallons	70.45	Right of way vegetation control; invasive species control, TSI, opening completion
Citrine Ultra	copper chelate	17 gallons	-	Algae control
Crossbow	2,4D	6 gallons	6	Invasive species control
Fusion	Fluazifop-p-butyl Fenoxaprop -p-ethyl	0.03 gallon	-	Invasive species control
Aquathol K	endothall	62.5 gallons	-	Removal of naiads
	Copper sulfate	250 lbs	-	Algae treatment
Nautique	1,2 Diaminoethane; triethanolamine, copper carbonate	150 gallons		Aquatic weeds
Clethodim	Clethodim	3 gallon	-	Invasive control
Suspend SC	Deltamethrin	0.5 gallon	-	Bedbug prevention/control in cabins
Tempo SC	Beta-cyfluthrin; 1,2-Propanediol	1.1 gallon	-	Bedbug prevention/control in cabins
Transport	Bifenthrin; acetamiprid	0.01 gallon	-	Bedbug prevention/control in cabins
Temprid SC	Imidacloprin; beta-cyfluthrin	1.07 gallon	-	Bedbug prevention/control in cabins

Note: The Tordon-picloram products are identified as CAS 6753-47-5 and CAS 2545-60-0 formulations, not the banned version CAS 1918-02-1. Likewise, Fusilade uses fluazifop-P-butyl (CAS 79241-46-6) not the banned fluazifop-butyl (CAS 69806-50-4).

Copper sulfate was added to the FSC HHP list in 2015.

The active chemicals in Suspend SC, Tempo SC, Transport, and Temprid SC are on the 2007 and 2015 FSC HHP lists (see CARs).

## SECTION B – APPENDICES (CONFIDENTIAL)

### Appendix 1 – List of FMUs Selected For Evaluation

FME consists of a single FMU

FME consists of multiple FMUs or is a Group

### Appendix 2 – List of Stakeholders Consulted

#### List of FME Staff Consulted (Interviews in meetings and at field sites)

NAME (Printed)	TITLE/POSITION	OPENING MEETING (Initials)	CLOSING MEETING (Initials)
Mike Ferrucci	NSF/ SFI Lead Auditor	MF	MF
Paul Pingrey	SCS Global/ FSC Lead Auditor	PP	PP
Brenda Huter	Forest Certification Coordinator, Indiana Division of Forestry	BH	BH
John Seifert	State Forester and Director, Indiana Division of Forestry	JS	JS
Dan Ernst	Assistant State Forester, Indiana Division of Forestry	DE	DE
John Friedrich	Property Specialist, Indiana Division of Forestry	JF	JF
Scott Haulton	Forestry Wildlife Specialist, Indiana Division of Forestry	SH	SH
AJ Ariens	Forestry Archaeologist, Indiana Division of Forestry	AJA	AJA
Pat Cleary	Property Manager Clark and Dean Lake	PC	
Gina Wilcoxon	Naturalist Dean Lake, Forester	GW	
Chris Wiedamann	Forester, Assistant Property Manager	CW	
<b>Harrison-Crawford S.F.</b>			
Dwane Sieg	Property Manager		DS
Wayne Werne	Resource Forester, Assistant Property Manager		WW
Elena Wilcoxon	Resource Forester		EW
Jim Hash	Conservation Officer		
Abby Irwin	District Forester		

#### List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Max Lambring	Lambring Logging		Interview in field	No

### Appendix 3 – Additional Audit Techniques Employed

None.

### Appendix 4 – Pesticide Derogations

<input checked="" type="checkbox"/> There are no active pesticide derogations for this FME.	
Name of pesticide / herbicide (active ingredient)	Date derogation approved

<b>Condition</b>	<b>Conformance (C / NC)</b>	<b>Evidence of progress</b>

### Appendix 5 – Detailed Observations

Evaluation Year	FSC P&C Reviewed
2011	All – (Re)certification Evaluation
2012	1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, 9.4
2013	1.1-1.6, 2.3, 3.2, 4.2, 4.4, 5.3, 5.6, 6.1-6.10, 9.4
2014	1.5, P.2, 3.2, 4.2, 4.4, P.5, 6.2, 6.3, 6.9 P.7, 8.2, 9.4
2015	1.5; 2.3; 3.1; 3.2; 3.3; 3.4; 4.1; 4.2; 4.3; 4.4; 4.5; 8.1; 8.2; 8.3; 8.4; 8.5; 9.1; 9.2; 9.3; 9.4.

Control Sheet:



2015\_IN\_State\_Forests\_FSC\_Criteria.xlsx

- C= Conformance with Criterion or Indicator
- NC= Nonconformance with Criterion or Indicator
- NA = Not Applicable
- NE = Not Evaluated

### FSC Principles Checklist

*FSC Forest Management Standard (v1.0)—United States*

REQUIREMENT	C/NC	COMMENT/CAR
<b>Principle #1: Compliance with Laws and FSC Principles</b> Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
<b>1.1 Forest management shall respect all national and local laws and administrative requirements.</b>	NE	
<b>1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b>	NE	
<b>1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b>	NE	

<p><b>1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.</b></p>	<p>NE</p>	
<p><b>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b></p>	<p>C</p>	
<p><b>1.5.a.</b> The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).</p>	<p>C</p>	<p>Evidence of conformance includes:</p> <ul style="list-style-type: none"> <li>• Active marking of property boundaries with all boundaries painted approximately every 5 years. For properties where boundary is uncertain, DoF works with surveyor to establish boundary.</li> <li>• DoF gates access roads.</li> <li>• ATV's are prohibited on State Forests, except for disabled hunters.</li> <li>• DoF maintains a "good neighbor database" and invites the public to yearly open houses.</li> <li>• DoF maintains a close working relationship with Law Enforcement.</li> <li>• DoF does a good job posting state forest regulations and trail closures.</li> </ul> <p>Through interviews, document review, and field inspection confirmed all of the above occurring on the Clark and Harrison-Crawford State Forests.</p> <p>To ensure that State Forest timber harvests are aboveboard, post-sale audits used to count stumps and verify that the final harvest conformed to the sale contract. Ten percent of closed sales are inspected annually in audits. The audits are intended to deter illegal harvest and avoid any allegations that foresters might be allowing loggers to take additional trees on the side.</p>
<p><b>1.5.b.</b> If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent</p>	<p>C</p>	<p>DoF works closely with law enforcement officers to curtail illegal activities. No signs of significant illegal activities were found at the sites visited during the 2015 audit.</p>

<p>possible for meeting all land management objectives with consideration of available resources.</p>		<p>Auditor observed evidence of ATV activity on a Harrison-Crawford forest road. Interview with Conservation Officer indicated a neighbor has a disabled hunter permit, which allows access.</p> <p>DNR's Law Enforcement Division employs 214 conservation officers who serve the public and protect the natural heritage of the state of Indiana. The division operates 10 law enforcement districts throughout the state. The Law Enforcement Division is Indiana's oldest state law enforcement agency, and one of the most diverse.</p> <p>The Law Enforcement Division also has an Investigations Section. These investigations are primarily focused on exploited or commercialized wildlife. They use a variety of techniques including specialized surveillance and undercover operations.</p>
<p><b>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b></p>	<p>NE</p>	
<p><b>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b></p>		
<p><b>2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</b></p>	<p>NE</p>	
<p><b>2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</b></p>	<p>NE</p>	
<p><b>2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be</b></p>	<p>C</p>	

<p><b>explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</b></p>		
<p><b>2.3.a</b> If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p>	C	<p>DoF maintains an open door policy both at the level of the central office and each state forest. Confirmed open door policy is used at Clark and Harrison-Crawford State Forests.</p> <p>DoF staff regularly check boundaries for timber sales that abut other ownerships. Additionally, they apply a no-harvest buffer zone to these types of sales, where needed.</p> <p>Use rights on public lands are defined in Indiana Administrative Rules: ARTICLE 8. <a href="#">PUBLIC USE OF NATURAL AND RECREATIONAL AREAS</a>.</p>
<p><b>2.3.b</b> The forest owner or manager documents any significant disputes over tenure and use rights.</p>	C	<p>DoF tracks legal ownership and boundary disputes through the State Land Office. Most issues deal with timber theft and unauthorized installation of septic lines or other utilities or residential uses (examples: gardens, yards, dog houses, sheds) into state lands.</p> <p>Disputes related to use rights are recorded in Indiana Administrative Law or Court decisions.</p>
<p><b>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</b></p>		
<p><b>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</b></p>	NA	
<p><b>3.1.a</b> Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.</p>	NA	<p>The FMU does not include any tribal lands or enterprises.</p>
<p><b>3.1.b</b> The manager of a tribal forest secures, in writing, informed consent</p>	NA	<p>The FMU does not include any tribal lands or enterprises.</p>

<p>regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.</p>		
<p><b>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b></p>	<p>C</p>	
<p><b>3.2.a</b> During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.</p>	<p>C</p>	<p>DNR has a representative on the <a href="#">Indiana Native American Indian Affairs Commission</a>, which studies and makes recommendations to appropriate federal, state and local governmental agencies in areas of concern to the state's Native and non-Native people. The ultimate objectives are to bring the Native community together, help identify and provide opportunities to the Native American people, and enhance social, cultural, community and economic development in Indiana.</p> <p>Commission meetings are open to the public and everyone is encouraged to attend and participate. The areas of focus identified by Indiana State Statute include: Employment, Education, Civil Rights, Health and Housing. Other areas of interest are always open for discussion, with the exception of tribal sovereignty and casinos. Indiana state law prohibits the Commission's involvement in these areas.</p> <p>Other topics that do not fall under the categories noted above can still be presented to and addressed by the Commission. Some issues, such as decisions regarding Native American human remains, are considered tribal matters and are outside the scope of the Commission's involvement. The Commission can, however, be a point of resource and referral should these matters arise.</p> <p>In May of 2007, DOF sent planning-related letters to federally recognized and unrecognized tribes with ancestral connections to the State of Indiana. That outreach should be updated as noted under 3.3.a.</p>

<p><b>3.2.b</b> Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.</p>	<p>C</p>	<p>DoF employs a fulltime archeologist who accompanied the audit team on 2015 site visits. She described the types of site surveys DNR conducts for any type of ground disturbing activities (see 2015 site notes). In 2014, she fielded 158 requests for archeologic information on State Forests. Procedures are described in a cultural resources protection manual. Property plans include projects to protect cultural resources and to improve interpretative services.</p>
<p><b>3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</b></p>	<p>C</p>	
<p>3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.</p>	<p>C (OBS)</p>	<p>In May of 2007, DoF sent letters to federally recognized and unrecognized tribes with ancestral connections to the State of Indiana. The letter had a cultural emphasis. No responses were received regarding the identification of sites of current or traditional cultural, archeological, ecological, economic or religious significance. Interviews with DoF staff indicate that no recent communications strategies with tribes have been attempted, although DoF and DNR’s Division of Historic Preservation and Archeology are planning to reconvene a tribal outreach council that the previous administration had allowed to become inactive.</p> <p>Considering that an FSC re-evaluation audit is scheduled for 2016, DoF conformance with indicator 3.3.a would be strengthened through renewed tribal outreach.</p>
<p><b>3.3.b</b> In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).</p>	<p>C</p>	<p>As no sites were identified by tribal representatives, the DoF has adopted its own protection measures of archaeological sites.</p>
<p><b>3.4. Indigenous peoples shall be compensated for the application of</b></p>	<p>NA</p>	

<p><b>their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</b></p>		
<p><b>3.4.a</b> The forest owner or manager identifies whether <i>traditional knowledge</i> in forest management is being used.</p>	NA	DOF does not employ any traditional knowledge in its forest management.
<p><b>3.4.b</b> When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.</p>	NA	DOF does not employ any traditional knowledge in its forest management.
<p><b>3.4.c</b> The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.</p>	NA	DOF does not employ any traditional knowledge in its forest management.
<p><b>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b></p>		
<p><b>4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b></p>	C	
<p><b>4.1.a</b> Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry.</p>	C	<p>DoF employment is managed under state laws and regulations by the Indiana State Personnel Department (SPD). The agency’s mission, values, benefits, compensation determination, etc. are described <a href="#">online</a>. Regarding wages, see observation, below in 4.1.c.</p> <p>The Indiana <a href="#">public employee handbook</a> provides detailed information.</p>
<p><b>4.1.b</b> Forest work is offered in ways that create high quality job opportunities for employees.</p>	C	<p>Interviews with staff during 2015 site visits indicate that DoF has a good mentoring program for new hires, including frequent interaction with central office personnel. The DoF forestry community is supportive.</p>

		<p>Foresters are provided with many training opportunities, and the central office allots funding to send staff to in-state training events.</p>
<p><b>4.1.c</b> Forest workers are provided with fair wages.</p>	<p>C (OBS)</p>	<p>Interviews indicate that in comparison with the other 18 members of the <a href="#">Northeastern Area Association of State Foresters</a>, Indiana DoF rates in the lower third in terms of wages. The lack of competitive pay for foresters (especially at the entry level) is causing an unsustainable situation where new employees are leaving nearly as fast as they are hired and trained. A DoF administrator said that 21 forester positions were filled in the past five years and 21 young foresters left state employment during the same timeframe. Five of the newly vacated positions are now unfilled as part of a budget-balancing policy. A few of the new hires have stayed, other positions being re-filled as many as three times. DoF is characterized, however, by senior staff and many relatively new hires with few foresters in the middle. That could be problematic as senior staff retire. Conformance with indicator 4.1.c could be strengthened if DNR were to improve pay and benefits sufficient to retain new hires.</p>
<p><b>4.1.d</b> Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.</p>	<p>C</p>	<p>DOF’s timber sale contract, item 20, includes a statement that contractors must conform to non-discriminatory policies in accordance to applicable federal and state laws. “4A TSI Bid-Contract under \$75,000” item 16 includes a requirement on nondiscrimination.</p> <p>Federal and State hiring and civil rights postings were observed in the State Forest offices. DOF uses the <a href="#">E-Verify</a> system to do background checks on new employees for compliance with Homeland Security. There have been no discrimination reports in recent years.</p> <p>DOF must abide by federal and state laws when hiring new workers. For example, IC 22-9-2 covers age discrimination. The state government agency, the Indiana Civil Rights Commission (<a href="http://www.in.gov/icrc/">http://www.in.gov/icrc/</a>) handles cases of</p>

		<p>discrimination and states that in Indiana:</p> <p>The people of Indiana are entitled by law to work and seek employment without being discriminated against on the basis of their disability (physical or mental), national origin, ancestry, race, color, religion and gender. An employee or an applicant for employment may file a complaint when: The alleged discriminatory act occurred within the past 180 days An employer or potential employer has six or more employees</p>
<p><b>4.1.e</b> The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.</p>	<p>C</p>	<p>DOF predominately hires Purdue graduates and state residents.</p> <p>The State of Indiana purchases goods and services from the lowest responsive and responsible bidder. Impacting the determination of "responsive and responsible" are a number of factors, including Executive Orders and statute-mandated preferences.</p> <p>In addition to the Buy Indiana, OneIndiana and Indiana Veteran's Business Enterprises program, which preferences Indiana businesses, the state has set goals to promote minority and women's business enterprise participation on state contracts. These preferences, plus others, are outlined in a solicitation's bid package. Additionally, the State is required to purchase goods from Indiana's State Use Program (A program of the Indiana Association of Rehabilitation Facilities) and PEN (Prison Enterprise Network) Products when these vendors are able to provide products to State specifications.</p> <p>These initiatives are impacting the way the state is designing bid packages and the way those bid responses are evaluated.</p> <p><a href="#">OneIndiana</a> : Effectively leverage the State's purchasing power to create savings for taxpayers. By combining and streamlining purchase activities, the State can achieve lower pricing and better value on commonly purchased goods and services.</p>

		<p><u>Buy Indiana</u>: Increase the amount of each State purchasing dollar that is spent with Indiana companies to \$0.90.</p> <p>The <u>Minority and Women’s Business Enterprises Division</u> (MWBE) acts on behalf of the State of Indiana to actively promote, monitor and enforce the standards for certification of minority and women’s business enterprises</p> <p><u>Indiana Veteran's Business Enterprises</u>: Sets a goal for the Indiana Department of Administration (IDOA) to procure at least 3 percent of state contracts with Indiana veteran-owned small businesses (IVBEs).</p> <p>The <u>Indiana State Use Program</u> is a preferential purchasing program that provides employment opportunities to people with disabilities and encourages state, county and other units of government to purchase products and services from approved State Use vendors without competitive bidding.</p> <p><u>PEN Products</u> (Prison Enterprises Network) manufactures goods and provide services using labor through Indiana's prison industries.</p> <p>Most timber sales are purchased by contractors within 95 miles of sale units.</p> <p>DoF completes construction projects with Prison Enterprises laborers.</p>
<p><b>4.1.f</b> Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>	<p>C</p>	<p>DOF makes significant contributions to the public education, such as: Active participation in local Project Learning Tree programs; hosting numerous logger training sessions (e.g., Game of Logging or GOL); DOF has established forestry research/demonstration areas (e.g., Purdue Hardwood Ecosystem Experiment; <a href="http://www.heeforeststudy.org/">http://www.heeforeststudy.org/</a>).</p> <p>In 2014, the Cooperative Forest Management section conducted 247 outreach events that reached 14,002 people. The programs included field days, the Forest Management for Private Woodland Owners course organized by Purdue University, Master Naturalist</p>

		<p>classes, Indiana Conservation Officer Camp, and presentations to various groups.</p> <p>During 2015 field site visits, the auditor observed interpretive displays and self-guided forestry trails (see site notes).</p> <p>In addition to enforcing state laws, Indiana conservation officers are active in a variety of non-law enforcement activities, such as outdoor education including <a href="#">boater and snowmobile</a>, <a href="#">hunter and trapper</a>, <a href="#">Karl Kelley Youth Camp</a>, and the <a href="#">Becoming an Outdoors Woman</a> programs.</p>
<p><b>4.1.g</b> The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.</p>	<p>C</p>	<p>DOF makes substantial contributions to the local economy. Payments in Lieu of Taxes (set at 15% of net timber sales) are an important source of revenue for many towns. Additionally, forest managers make attempts to purchase goods and services locally, such as servicing vehicles locally or purchasing materials from local businesses. Furthermore, the state forests provide a number of excellent recreation opportunities. Recreation constitutes a significant portion of economic activity during certain times of the year in many small rural communities.</p> <p>Forestry (hardwoods) is Indiana's largest agricultural industry, in terms of jobs (130,000), wages (\$1.2 billion), and impact on the economy (\$17 billion). Forest products are Indiana's 4th largest manufacturing sector.</p>
<p><b>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b></p>	<p>C</p>	
<p><b>4.2.a</b> The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p>	<p>C</p>	<p>DoF takes active steps to ensure safety, such as:</p> <ul style="list-style-type: none"> <li>• safety inspections from a DNR Safety Officer occur at each state forest;</li> <li>• safety meetings take place once per month;</li> <li>• safety training classes are offered, e.g., chainsaw safety for DoF employees;</li> </ul>

		<ul style="list-style-type: none"> <li>• DoF provides insect repellent and safety boots for staff;</li> <li>• DoF is an active support of logger education in Indiana.</li> </ul> <p>During 2015, auditor observed DoF employees conforming to relevant safety protocols.</p> <p>The Indiana Occupational Safety and Health Administration (IOSHA) is dedicated to ensuring workplace safety and health. IOSHA's Whistleblower Protection Unit works to maintain the integrity of the <a href="#">Indiana Occupational Safety and Health Act</a> by protecting the rights that law gives to employees. Among these rights are the ability to file, without reprisal, safety and health complaints with a government agency or company management and the freedom to participate in an IOSHA inspection.</p>
<p><b>4.2.b</b> The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</p>	C	<p>DoF's timber sale agreement (4A Timber Sale Agreement) includes several items related to safety (see items 12, 13, 15, 18, and 19). The TSI contract (4A TSI Bid-Contract under \$75,000) includes a section on compliance with all applicable federal, state, and local laws, which includes OSHA safety requirements.</p>
<p><b>4.2.c</b> The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p>	C	<p>DoF's timber sale agreement requires that at least one logger on each job site have at least complete Game of Logging (GOL) Level 1 training. Observed conformance through logger interviews during 2015 audit.</p>
<p><b>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</b></p>		
<p><b>4.3.a</b> Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>	C	<p>The right for workers to freely associate and unionize is clearly protected by U.S. and Indiana law. ILO Convention 98, however, does not apply to public sector workers. Under U.S. Federal Law and consistent with ILO 98, public sector employee rights are established by the U.S. Congress for federal employees and by state legislatures for state, county and local public sector employees. The right to organize is</p>

		<p>outlined in <a href="#">IC 22-7</a> (accessed Oct 31, 2015).</p> <p>Indiana passed a right-to-work law ending mandatory union dues in 2012, when 22.8 percent of Indiana’s government workers were union members. By 2014, the Indiana State’s government union membership rate had increased to 25.5 percent.</p>
<p><b>4.3.b</b> The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p>	<p>C</p>	<p>The Indiana Civil Service complaint procedure is enacted at <a href="#">IC 4-15-2.2-42</a>. Employees in the state civil service, except those appointed by the governor, may file a complaint concerning the application of a law, rule, or policy to that employee. The complaint must identify the law, rule, or policy allegedly violated, the facts supporting the allegation, and the remedy the employee is requesting.</p> <p>A dispute procedure is outlined in 4A TSI Bid-Contract under \$75,000. For the timber sale contract (4A Timber Sale Agreement), there is no specific language on dispute resolution other than reference to bringing suit within the State of Indiana in case of disagreement.</p>
<p><b>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</b></p>	<p>C</p>	
<p><b>4.4.a</b> The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> <li>• Archeological sites and sites of cultural, historical and community significance (on and off the FMU);</li> </ul>	<p>C</p>	<p>Confirmed DoF is using the following approaches to understand social impacts and incorporate into management:</p> <ol style="list-style-type: none"> <li>1. Ongoing archeological review of projects</li> <li>2. Open houses for public to review planned management</li> <li>3. Posting of management plans for public review on website.</li> <li>4. Timber sales are offered at different scales (volumes) for different businesses, such as for TSI and invasive species control.</li> </ol>

<ul style="list-style-type: none"> <li>• Public resources, including air, water and food (hunting, fishing, collecting);</li> <li>• Aesthetics;</li> <li>• Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health;</li> <li>• Community economic opportunities;</li> <li>• Other people who may be affected by management operations.</li> </ul> <p>A summary is available to the CB.</p>		<p>5. Public resources, including air, water, and soil, have been evaluated for both ‘direct’ and ‘indirect’ effects of management activities as well as the cumulative effect of said activities on these public resources. The results of this analysis are located within the 2008 Environmental Assessment (EA) document.</p> <p>The 2015 Indiana Forestry Strategic Directions planning documents and process address social impacts.</p>
<p><b>4.4.b</b> The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	C	<p>State Forest planning documents and resource management plans are open to public comment for at least 30 days prior to finalization. Additionally, DoF holds several public meetings and open houses throughout the state each year to solicit and address public comments. The 2015 Forestry Strategic Directions process involved three public meetings, and DoF is in process of addressing stakeholder input.</p>
<p><b>4.4.c</b> People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	C	<p>There are two principle ways that people are apprised of relevant activities: 1) timber sales &amp; state forest management guides are on the website and stakeholders can provide comments; and 2) Open houses (at open house will have list of planned activities). DoF also attempts to prepare news releases to advertise events. For adjacent landowners, a notification letter or other communication on upcoming timber sales is a common practice.</p>
<p><b>4.4.d</b> For <i>public forests</i>, consultation shall include the following components:</p> <ol style="list-style-type: none"> <li>1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans;</li> </ol>	C	<p>For background in this indicator and DoF, see Major CAR 2006.2 and minor CAR 2007.1. This indicator is nearly identical to the previous standard and those CARs addressed items 1-3, as well as the unnumbered part, of the indicator.</p> <p>In Indiana, stakeholders are free to use the legal system to appeal planning decisions. However, DoF’s notification to adjacent landowners of upcoming</p>

<p>2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management;</p> <p>3. An accessible and affordable appeals process to planning decisions is available.</p> <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>		<p>activities, open door policies, annual open houses, and State Forest Stewardship Committee meetings are avenues for resolving grievances prior to legal action.</p> <p>Management planning documents, including upcoming timber sales, are made available to the public online. The public can also access publications and data on the website or upon request.</p> <p>Anyone can put in a public information request at any time per DoF's policy. The requests are reviewed on case by case basis. Unless there is some legal reason (RTE species, archaeological site, etc.) or the document is a draft not ready for public comment, the information is typically released. There may be a cost to the requestor for copying or other document production. In general, if someone really wants a disclosable document, they will get it from DoF.</p> <p>Based on comments in the media, Indiana's 2015 Forestry Strategic Directions planning process that vests drafting and review in the elected Executive Branch and Governor-appointed NRC troubles some interest groups that would like more direct involvement in all phases of plan development and review. The FSC standard does not, however, prescribe the methods an organization uses for public input. As noted previously, the 2015 Forestry Strategic Directions process involved three public meetings, and DoF commitment to address stakeholder input.</p>
<p><b>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</b></p>	<p>C</p>	
<p><b>4.5.a</b> The forest owner or manager does not engage in negligent</p>	<p>C</p>	<p>DOF staff regularly check boundaries for timber sales that abut other ownerships. Additionally, they apply a</p>

<p>activities that cause damage to other people.</p>		<p>no-harvest buffer zone to these types of sales, where needed. SCS' stakeholder consultation uncovered no cases of negligent behavior in DOF staff. DOF also reported no pending cases of this nature.</p> <p>DoF staff routinely inspect campgrounds for hazardous trees and remove high risk trees. Signs are posted to warn recreational users in the vicinity of timber harvests.</p>
<p><b>4.5.b</b> The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>	<p>C</p>	<p>DOF's notification to adjacent landowners of upcoming activities, open door policies, annual open houses, and State Forest Stewardship Committee meetings are avenues for resolving grievances prior to legal action. Also, DOF's active boundary marking is evidence of an effort to outright avoid a common type of grievance.</p> <p>DoF provided an example of a state citizen using the court appeals process to contest timber harvesting on State Forests. Case IFA v. DNR 53C06-0207-PL-01246 was first filed in 2002. The petitioner just recently moved to dismiss the case in September 2015.</p>
<p><b>4.5.c</b> Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.</p>	<p>C</p>	<p>There has been no substantiated damage or loss of income caused by DOF. If claims are filed, they are handled by the State Attorney General and litigated accordingly.</p>
<p><b>Principle #5: Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits. (NE)</b></p>		
<p><b>Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</b></p>		
<p><b>6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of</b></p>	<p>NE</p>	

<p><b>forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</b></p>		
<p><b>6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</b></p>	C	
<p>6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	C	<p>DoF has a program to protect threatened and endangered species. Training is periodically provided on endangered species identification and management, most notably for Indiana bat habitat. There are 79 state-listed Threatened and Endangered (T and E) animal species (in Indiana the Indiana Bat and the Gray bat have the only endangered designation for fauna at the federal level). DoF participates in state and federal programs to research and protect T and E species. For example, DoF is participating in a review of invertebrate species with other government agencies.</p> <p>DoF actively uses the Division of Nature Preserves' Heritage Database to screen for T and E species in management areas. If a species is detected in a database query, DoF has its own wildlife biologist to carry out surveys and devise protection plans. T and E species locations are identified as part of the process of writing the resource management guide prior to management activities.</p>
<p>6.2.b. When RTE species are present</p>		<p>When RTE species are known to occur (by querying the</p>

<p>or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. <b>Conservation zones</b> and/or <b>protected areas</b> are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>		<p>Natural Heritage Data), staff will determine appropriate steps to protect the species. These steps may include a consultation with the biologist or ecologist or written species- specific management plans to accommodate individual species requirements. Staff consult Natureserve web site to search for management guidelines for T and E species.</p>
<p>6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species’ recovery goals, as well as landscape level biodiversity conservation goals.</p>	<p>C</p>	<p>DoF follows its interim guidelines on the conservation of the Indiana Bat. These guidelines were developed by its biologist in consultation with federal agencies. DoF is close to receiving approval for its HCP to address Indiana Bat conservation. Research is showing that management of State Forests is compatible with conservation goals for Indiana Bat.</p> <p>Pauli, Benjamin (2014). <i>Nocturnal and Diurnal Habitat of Indiana and Northern Long Eared Bats, and the Simulated Effect of Timber Harvest on Habitat Suitability</i>, A Dissertation Submitted to the Faculty of Purdue University by Benjamin P. Pauli.</p>
<p>6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	<p>C</p>	<p>DoF field staff regularly patrol the FMU to detect unauthorized activities and work with interested user groups to avoid adverse impacts to flora, fauna, and soil resources. For example, SCS observed signage at district offices regarding ginseng harvesting. SCS also noted that district offices were working with horse rider groups on maintaining established trails.</p>
<p><b>6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem</b></p>	<p>C</p>	

<p><b>diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</b></p>		
<p>6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>	<p>C</p>	<p>DoF has a goal to maintain 10% of the forest in the underrepresented early successional stage. Nature Preserves are being identified and protected on DoF property. DoF strategic plan is to maintain 10% of the forest in an older forest condition. Areas designated for older forest condition include:</p> <ul style="list-style-type: none"> <li>• Nature Preserves on State Forests</li> <li>• Control units (no harvest) of Hardwood Ecosystem Experiment (HEE)</li> <li>• ‘No harvest zone’ around active Indiana bat hibernacula on state forests</li> <li>• Back Country Areas (BCA) located on Morgan-Monroe/Yellowwood, Jackson-Washington, and Clark state forests</li> <li>• Old growth areas and associated 300 foot buffer zone</li> </ul>
<p>6.3.a.2. When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <i>conservation zones</i> and/or <i>protected areas</i> are established where warranted.</p>	<p>C</p>	<p>Most rare ecological communities have been protected as Nature Preserves. Once a Nature Preserve is established, management decisions are made by or in consultation with the Division of Nature Preserves. DoF has a policy to allow management to occur in rare ecological communities if it maintains or enhances the viability of the community.</p>
<p>6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all <i>Type 1</i> and <i>Type 2 old growth</i>. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management</p>	<p>C</p>	<p>DoF has developed procedures to assess and identify Type 1 and Type 2 old growth on state forests. This guidance includes definitions of old growth classifications consistent with indicator 6.3.a.1, and a continuous assessment protocol to be incorporated this point forward in the routine development of tract management guides. DoF has a process to identify and evaluate potential old forest. Some areas are being evaluated, but none have been identified as Type II. DoF has other areas on the forests that are being managed for late serial conditions, but do not yet meet the definition of Type II.</p>

<p>activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> <li>1. Old growth forests comprise a significant portion of the tribal ownership.</li> <li>2. A history of forest stewardship by the tribe exists.</li> <li>3. High Conservation Value Forest attributes are maintained.</li> <li>4. Old-growth structures are maintained.</li> <li>5. Conservation zones representative of old growth</li> </ol>		
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<p>stands are established. 6. Landscape level considerations are addressed. Rare species are protected.</p>		
<p>6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	C	<p>IDNR DIVISION OF FORESTRY STRATEGIC PLAN 2008-2013 has a goal to provide a range of forest habitats that will provide suitable conditions for well-distributed animal populations. See also comments on late and early seral habitat in 6.3.a.1.</p>
<p>6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of <b>Riparian Management Zones (RMZs)</b> to provide:</p> <ul style="list-style-type: none"> <li>a) habitat for aquatic species that breed in surrounding uplands;</li> <li>b) habitat for predominantly terrestrial species that breed in adjacent <b>aquatic habitats</b>;</li> <li>c) habitat for species that use riparian areas for feeding, cover, and travel;</li> <li>d) habitat for plant species associated with riparian areas; and,</li> </ul> <p>stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</p>	C	<p><u>Indiana Logging and Forestry Best Management Practices: BMP Field Guide</u> (BMP Field Guide) is used by field foresters to guide the protection of RMZs. The buffer zones established in RMZs ensure upland-lowland connectivity (a, b, and c) and maintenance of riparian vegetation and soils (d and e).</p>
<p><b>Stand-scale Indicators</b> 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	C	<p>Indiana DoF has an increased emphasis on management and sustainability of oak-hickory communities due to their decline in the landscape (Indiana State Forests Environmental Assessment 2008).</p>
<p>6.3.e. When planting is required, a local source of known provenance is used when available and when the</p>	C	<p>Seedlings planted in the forest are grown in the local nursery. 2014 audit included visit to Vallonia State Nursery, which provides majority of seedlings.</p>

<p>local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. <b>Native species</b> suited to the site are normally selected for regeneration.</p>		
<p>6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:  a) large live trees, live trees with decay or declining health, <b>snags</b>, and well-distributed coarse down and dead woody material. <b>Legacy trees</b> where present are not harvested; and  b) vertical and horizontal complexity. Trees selected for <b>retention</b> are generally representative of the dominant species found on the site.</p>	<p>C</p>	<p>DoF has an excellent guide “Management guidelines for compartment-level wildlife habitat features” that field foresters use to maintain or enhance site-level habitat components, such as large live trees, declining trees, and snags.  During 2014 audit, confirmed guidelines are being followed.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when <b>even-aged systems</b> are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and</p>	<p>C</p>	<p>DoF primarily employs uneven-aged management practices, such as individual tree selection and group selection. Even-aged management practices include clearcuts and shelterwood systems. A clearcut to convert non-native pine to hardwood on Ferdinand Pike State Forest included sufficient retention within islands and in scattered residuals. Property manager worked with DoF biologist to ensure retention met green tree retention procedure.</p> <p>DoF also practices even-aged management on an experimental basis. These are well-documented in the HEE report.</p>

<p>configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> <li>1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture).</li> <li>2. Is based on the totality of the <b>best available information</b> including peer-reviewed science regarding natural disturbance regimes for the FMU.</li> <li>3. Is spatially and temporally explicit and includes maps of proposed openings or areas.</li> <li>4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species.</li> <li>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</li> </ol>	<p>NA</p>	<p>There are no even-aged management restrictions in the Lake States/ Central Hardwood region.</p>
<p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <b>invasive species</b>, including:</p> <ol style="list-style-type: none"> <li>1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems;</li> </ol>	<p>NE</p>	

<p>2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</p> <p>3. eradication or control of established invasive populations when feasible: and, monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</p>		
<p>6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	C	<p>DoF maintains site-level fire plans that are primarily conducted in oak-hickory understories to control competing species. This regime mimics natural periodic ground fires that historically occurred in this habitat type.</p>
<p><b>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</b></p>	NE	
<p><b>6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</b></p>	NE	
<p><b>6.5.a</b> The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	NE	
<p><b>6.5.b</b> Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation</p>	NE	

<p>takes place.</p>		
<p><b>6.5.c</b> Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> <li>• Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard.</li> <li>• Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site.</li> <li>• Rutting and compaction is minimized.</li> <li>• Soil erosion is not accelerated.</li> <li>• Burning is only done when consistent with natural disturbance regimes.</li> <li>• Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives.</li> <li>• Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed.</li> <li>• Low impact equipment and technologies is used where appropriate.</li> </ul>	<p>C (OBS)</p>	<p>Indicator 6.5.c requires that “management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance.”</p> <p>The DoF rutting guidelines designed to protect soil resources allow for continued hauling and skidding as long as the ruts can be smoothed so that they do not exceed 18” in depth. This guideline alone may not be effective at preventing root damage, changes in hydrology, and compaction that often occur when ruts are being made. Smoothing of ruts does not alleviate the root damage, compaction, and changes to hydrology associated with rutting.</p> <p>DNR initiated a process in 2015 to strengthen soil compaction and rutting guidelines, which are still in draft form. Some State Forest staff have been trained regarding new expectations, but others including timber producers have not. The Observation shall be carried over to track continuing progress.</p>

<p><b>6.5.d</b> The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> <li>• access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts;</li> <li>• road density is minimized;</li> <li>• erosion is minimized;</li> <li>• sediment discharge to streams is minimized;</li> <li>• there is free upstream and downstream passage for aquatic organisms;</li> <li>• impacts of transportation systems on wildlife habitat and migration corridors are minimized;</li> <li>• area converted to roads, landings and skid trails is minimized;</li> <li>• habitat fragmentation is minimized;</li> <li>• unneeded roads are closed and rehabilitated.</li> </ul>	<p>C (OBS)</p>	<p>Although sites visited in 2015 demonstrated good to excellent main haul roads (upgraded in recent years to handle more wet-weather traffic and larger log trucks), auditors observed some rutting and erosion on recreational trails, especially those open for equestrian use (e.g., Turkey Ridge Fire Trail 301, Fox Hollow Fire Trail/Horse Trail/Wagon Route). Continued conformity with this indicator could be strengthened through improvement in the maintenance of recreational trails which are placed on forest access roads or fire trails, consistent with Indiana BMP Guide page 15: “Insure that all erosion control and water management measures (e.g. water bars, drainage dips, culverts and ditches) are working.”</p>
<p><b>6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest</b></p>	<p>C</p>	

<p><b>management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</b></p>										
<p><b>6.6.a</b> No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	<p>NC</p>	<p>DoF uses the following pesticides on the FSC HHP list (2007 and 2015) for bedbug control/prevention in State Forest recreation cabins:</p> <table border="0"> <tr> <td>Suspend SC</td> <td>Deltamethrin</td> </tr> <tr> <td>Tempo SC</td> <td>Beta-cyfluthrin; 1,2-Propanediol</td> </tr> <tr> <td>Transport</td> <td>Bifenthrin; acetamiprid</td> </tr> <tr> <td>Temprid SC</td> <td>Imidacloprin; beta-cyfluthrin</td> </tr> </table> <p>DNR also reported use of copper sulfate for lake algae control. That product was added to the HHP list in 2015.</p> <p>While these products may be labelled for these uses, they are not allowed under the terms of FSC certification without a duly-approved derogation.</p> <p>Organization must immediately cease use of products on the old HHP list or excise the cabin sites from the scope of the FSC certificate.</p> <p>For products added to the HHP list in 2015, either discontinue use of prohibited HHP chemicals or obtain FSC-approved derogations by June 30, 2016.</p>	Suspend SC	Deltamethrin	Tempo SC	Beta-cyfluthrin; 1,2-Propanediol	Transport	Bifenthrin; acetamiprid	Temprid SC	Imidacloprin; beta-cyfluthrin
Suspend SC	Deltamethrin									
Tempo SC	Beta-cyfluthrin; 1,2-Propanediol									
Transport	Bifenthrin; acetamiprid									
Temprid SC	Imidacloprin; beta-cyfluthrin									
<p><b>6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be</b></p>	<p>NE</p>									

<p><b>disposed of in an environmentally appropriate manner at off-site locations.</b></p>		
<p><b>6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</b></p>	<p>NE</p>	
<p><b>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	<p>NE</p>	
<p>6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p>	<p>C</p>	<p>DOF has use of seed mixes detailed in its procedures manual and application in the BMP manual. DOF generally uses winter wheat or oats depending on the season (coldness) for closeouts. However, with the increased incidence of Japanese Stiltgrass (exotic) on some State Forests, DOF has started using fescues (exotic), especially the shorter varieties as they are more competitive with the Stiltgrass. There has been some research to show that Kentucky 31 fescue can crowd out stiltgrass. Winter wheat and oats application works well the first growing season, however as the seed does not cover the ground completely they just tend to make a very good cover for stiltgrass to seed in. The Division of Nature Preserve ecologists, would rather have the tradeoff for fescue persistence than the spread of more stiltgrass.</p>
<p>6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.</p>	<p>NE</p>	
<p>6.9.c. The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species</p>	<p>C</p>	<p>As the species used to re-seed landings and other exposed areas, they tend to remain at the planted location. Like many state agencies, DOF discontinued the use of some seed mixes once they were proven to be invasive.</p>

<p><b>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</b>  <b>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</b></p>	<p>NE</p>	
<p><b>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</b></p>		
<p><b>7.1. The management plan and supporting documents shall provide:</b>  <b>a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</b>  <b>b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</b>  <b>b) h) Maps describing the forest resource base including</b></p>	<p>NE</p>	

<p><b>protected areas, planned management activities and land ownership.</b>  <b>i) Description and justification of harvesting techniques and equipment to be used.</b></p>		
<p><b>7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</b></p>	C	
<p><b>7.2.a</b> The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.</p>	C (OBS)	<p>Indicator 7.2.a. requires that the “management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.” DoF is operating on year 7 of a 5 year Strategic Plan (2008-2013).</p> <p>In early 2015, the Division of Forestry received authorization from the Executive Branch to proceed with updating the Forestry Strategic Plan. The Indiana process entailed DoF drafting the plan, review of the draft plan by the DNR Executive Office with approval to seek public input, and DoF conducting public meetings and inviting online input, which closed Oct 31. Pending actions include DoF response to stakeholder comments, adjustments to the plan and final review by the Executive Branch. Fee proposals in the plan will also be taken to the Indiana Natural Resources Commission (NRC) for approval.</p> <p>OBS: Continue work to complete and implement the proposed Division of Forestry Strategic Direction 2015-2019, including response to stakeholder input and final review by DNR Executive Office .</p>
<p><b>7.3 Forest workers shall receive</b></p>	NE	

<p><b>adequate training and supervision to ensure proper implementation of the management plans.</b></p>		
<p><b>7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</b></p>	C	
<p><b>7.4.a</b> While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.</p>	C	<p>The following documents serve as DoF’s public summary.</p> <p><a href="#">2014 Annual Report State Forest Environmental Assessment (http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf )</a></p> <p><b>Division of Forestry 2008 -2013 Strategic Plan</b>  <a href="#">(http://www.in.gov/dnr/forestry/files/fo-Forestry-Strategic-Plan-2008-2013.Final.pdf)</a></p> <p><a href="#">DIVISION OF FORESTRY STRATEGIC DIRECTION 2015-2019</a></p> <p><b>Resource Management Guides</b> Management guides for individual tracts are available  <a href="#">(http://www.in.gov/dnr/forestry/3643.htm )</a></p> <p><a href="#">DoF’s webpage</a> also includes other documents that are completely accessible to the public.</p>
<p><b>7.4.b</b> Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.</p>	C	<p>Plans and supporting documentation are available through the Indiana open records laws. DoF holds annual open house meetings at each State Forest to discuss operational plans, which are available on the Internet. DoF to address stakeholder comments gathered during 2015 Forestry Strategic Plan public meetings and via a web form. Public review for the Strategic Plan also entails submittal to the DNR Executive Office.</p>
<p><b>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</b></p>		
<p><b>8.1 The frequency and intensity of monitoring should be determined by</b></p>	C	

<p><b>the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</b></p>		
<p><b>8.1.a</b> Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.</p>	<p>C</p>	<p>DOF has developed monitoring protocols in overall conformance to C8.2 that are systematically implemented and replicable. Monitoring protocols are documented to ensure consistency between state forests. Results are published or <a href="#">summarized in reports</a> in most cases.</p> <p>System-wide inventories follow procedures as described in the Resource Inventory section of the Procedures Manual. Additionally, DOF is directed by many different planning documents, and each has different monitoring strategies:</p> <p>Forest Health Protection monitors various insect and disease levels annually; Division of Fish and Wildlife has various monitoring routines from annual surveys to more periodic surveys; Division of Forestry monitoring program includes typical weekly inspections of active timber sales, annual 2nd-party monitoring of BMPs, 20-year monitoring of the inventory, and 5-year statewide permanent plot inventory analysis through FIA; Other inventories/monitoring on DOF properties includes Natural Areas inventory, fish population monitoring, cultural/archeological resource inventory.</p>
<p><b>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of</b></p>	<p>C</p>	

<p><b>harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</b></p>		
<p><b>8.2.a.1</b> For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	<p>C</p>	<p>DoF meets the breadth of this Indicator through its periodic system-wide inventory and CFI system, which together cover items a)-f).</p> <p>The process to evaluate regeneration in regeneration opening (group selection and clear-cuts) is described in the new form “State Forest Timber Sale Post-Harvest Evaluation”. The form includes Y/N answers for regeneration adequacy, presence of invasive species, and actions needed.</p>
<p><b>8.2.a.2</b> Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	<p>C</p>	<p>During active operations, monitoring generally includes at least weekly site inspections with the results documented on the Timber Sale Visitation and Evaluations. Each sale is also officially “closed out” with an inspection by a central office forester. Documentation was reviewed for a selection of sites visited during the audit.</p>
<p><b>8.2.b</b> The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	<p>Permits are not allowed for ginseng harvesting on State Forests. The Division of Nature Preserves is responsible for regulating the harvest and trade of ginseng in the State. Sales records are kept for each timber sale that allow for volume analysis at the district and whole-state forest system level. Current harvest data shows that harvest does not exceed growth.</p>
<p><b>8.2.c</b> The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> <li>1) Rare, threatened and endangered species and/or their <b>habitats</b>;</li> <li>2) Common and rare plant communities and/or habitat;</li> <li>3) Location, presence and abundance of invasive species;</li> <li>4) Condition of protected areas,</li> </ol>	<p>C</p>	<p>Indiana DoF properties section wildlife biologist completes annual monitoring <a href="#">snag and cavity trees</a>, spring resident bird populations, summer breeding bird populations, forest amphibians, and deer impacts from browsing. Division of Fish &amp; Wildlife, fisheries section conducts annual creel census. The State of Indiana has a breeding bird atlas. Periodic surveys are completed for bats in caves. Periodic surveys are completed for the wood rat. Ruffed Grouse drumming surveys are completed. Nature Preserves completes annual surveys on</p>

<p>set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4).</p>		<p>preserves. DoF completes monitoring of BMP's annually.</p> <p>T and E species that were previously undetected in other surveys are reported to the Natural Heritage Inventory Database.</p> <p>Monitoring of HCV occurs as part of site inspections and, if near an active harvest, as part of harvest monitoring. Should HCVs undergo active management, such as prescribed fire, DoF monitors the response (e.g., regeneration).</p> <p>DoF cooperates with the <a href="#">Indiana Invasive Species Council</a> on monitoring and prevention.</p> <p><a href="#">Hardwood Ecosystem Experiment</a> (HEE), a 100 year research project, continued including research on Indiana bats. There was a change in an existing management buffer due to the finding of an Indiana bat maternity roost tree. EcoBlitz is occurring at the Morgan-Monroe Back County Area.</p> <p>When management guides are updated, the invasive species section is also updated. Informal monitoring also occurs and since most field staff are licensed applicators, they may treat trouble spots quickly.</p> <p>As part of HCP development, extensive bat monitoring has occurred across Indiana State Forests. Results of this monitoring have been accepted in peer reviewed scientific journals.</p>
<p><b>8.2.d.1</b> Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	<p>C</p>	<p>Evidence of monitoring includes the following reports and records:</p> <ul style="list-style-type: none"> <li>• Timber sale inspection reports</li> <li>• Annual BMP monitoring report results</li> <li>• Contract monitoring (TSI forms)</li> </ul> <p>More fundamental to meeting this indicator, DoF inspects active timber sales and conducts post-harvest reviews to ensure that objectives and BMPs are being</p>

		met.
<b>8.2.d.2</b> A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	DoF monitors road construction and maintenance by tracking how many miles are completed each year per property. Informal inspections occur during and after timber harvests.
<b>8.2.d.3</b> The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	Summary and Monitoring of Social Impacts of State Forest Management Activities (CAR 2011.3 and 2011.11 Summary and Monitoring of Social Impacts.doc)  State Forest Environmental Assessment: ( <a href="http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf">http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf</a> )
<b>8.2.d.4</b> Stakeholder responses to management activities are monitored and recorded as necessary.	C	Strategic Plan and EA has stakeholder comments and responses recorded. Stakeholder comments and responses to Management Guides are summarized on DoF website.  All stakeholder comments in regard to the 2015-19 Forestry Strategic Directions will be summarized and responses prepared as part of the planning process.
<b>8.2.d.5</b> Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	No tribes have expressed interest in monitoring sites of cultural significance. Many sites are pre-historic, making it difficult to tell which tribal groups were present.
<b>8.2.e</b> The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	Costs of arranging each timber sale is included in each site plan for later analysis. The budget office maintains information on all expenditures and income. DoF's upper management analyses budgets for individual projects and the department as a whole to assess productivity and efficiency.
<b>8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</b>	C	
<b>8.3.a</b> When forest products are being	C	See the Chain of Custody Appendix for more

<p>sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.</p>		<p>information. DoF maintains a COC system that prevents the mixing of certified and non-certified products prior to the point of sale and has accompanying documentation to enable the tracing of the harvested material from the ‘stump to the gate.’</p>
<p><b>8.3.b</b> The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.</p>	<p>C</p>	<p>See the COC Appendix for more details.</p>
<p><b>8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b></p>	<p>C</p>	
<p><b>8.4.a</b> The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.</p>	<p>C</p>	<p>Post-harvest monitoring is conducted to track progress on individual Management Guides for each district. DoF carefully monitors progress on objectives in the plan since half its annual funding relies on product sales and services. Forest health deviations such as tree mortality from emerald ash borer and drought are closely monitored.</p>
<p><b>8.4.b</b> Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard,</p>	<p>C</p>	<p>The 2015-2019 Strategic Plan reflects results of monitoring and includes a number of changes. See Section 3 of the 2015 audit report.</p> <p>Monitoring showed a lack of oak regeneration in the state, prompting DNR to change harvest techniques to cut more gaps that help light-demanding seedlings like oaks. In 2014, DoF made over 400 acres of openings for early successional habitat. DoF also planted oaks in old fields to enhance the oak composition (see site notes).</p> <p>Based on interviews during 2015 site visits, DoF is not satisfied with soil compaction/rutting standards or residual tree damage guidance, and so they are in the process of revising those instructions.</p>

then the objectives and guidelines are modified.		
<b>8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</b>	C	
<b>8.5.a</b> While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	C	All monitoring results are available on the public record. Many monitoring reports and analyses are available on the State of Indiana’s <a href="#">website</a> . For example, BMP monitoring results are published on the website annually.
<p><b>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p> <ul style="list-style-type: none"> <li><b>a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance</b></li> <li><b>b) Forest areas that are in or contain rare, threatened or endangered ecosystems</b></li> <li><b>c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)</b></li> <li><b>d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).</b></li> </ul>		
<b>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</b>	C	
<b>9.1.a</b> The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the	C	In response to CAR 2011.12, DoF’s updated HCVF documents address Indicator 9.1.a. See State HCVF description in Appendix 10 of the 2012 FSC Surveillance Audit Report. Interviews with staff

<p>extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>		<p>indicate the HCVF assessment will be updated for the 2016 re-evaluation audit.</p>
<p><b>9.1.b</b> In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.</p>	<p>C</p>	<p>DOF consulted Nature Preserves, local experts, and specialists when they identified HCVF's. The call for nominations for HCVFs remains open at any time, which is one of the main reasons that DOF demonstrates overall conformance to this indicator. The web document "<a href="#">INDIANA DIVISION OF FORESTRY HIGH CONSERVATION VALUE FORESTS</a>" refers the reader to the Division of Nature preserves for more information on the classification and management of Nature Preserves. Nature Preserves has long had its own partners in assessing areas that may meet the definition of HCVs. For example, local land trusts and The Nature Conservancy have collaborated with <a href="#">Nature Preserves</a> on classification and management of identified HCVs.</p>
<p><b>9.1.c</b> A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.</p>	<p>C</p>	<p>The web document "<a href="#">INDIANA DIVISION OF FORESTRY HIGH CONSERVATION VALUE FORESTS</a>" summarizes the process used to identify HCVF, their locations and the process to provide comment. A general management strategy is also provided.</p>
<p><b>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</b></p>	<p>C</p>	
<p><b>9.2.a</b> The forest owner or manager</p>	<p>C</p>	<p>DoF utilizes experts in the Division of Nature</p>

<p>holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.</p>		<p>Preserves, Indiana Heritage Trust, Division of Wildlife, Division of Historic Preservation and Archaeology, Purdue University, NGOs like The Nature Conservancy, and the USFWS regarding HCV identification and management strategies.</p>
<p><b>9.2.b</b> On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.</p>	<p>C</p>	<p>The Division of Forestry added a section to each classified HCVF on how public comments were considered. The Division posts HCVF information on the Division of Forestry website. Protection of HCVFs is an element of the 2015-2019 Forestry Strategic Directions Plan, which includes a public input process.</p>
<p><b>9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</b></p>	<p>C</p>	
<p><b>9.3.a</b> The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>	<p>C</p>	<p>The web document “INDIANA DIVISION OF FORESTRY HIGH CONSERVATION VALUE FORESTS” summarizes management activities in HCFV’s.</p> <p>In response to CAR 2011.14, the Division of Forestry determined which divisions will have management responsibility of each of the HCVF. In addition a description of the management measures to maintain and/or enhance the HCVF were added for each HCVF.</p>
<p><b>9.3.b</b> All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.</p>	<p>C</p>	<p>The web document “INDIANA DIVISION OF FORESTRY HIGH CONSERVATION VALUE FORESTS” summarizes management activities in HCFV’s.</p> <p>2015 field site visits included HCVF tracts where prescribed burning and invasive species control work had been completed. Site protection and improvements had also been completed or planned</p>

		for HCVs related to special cultural/historic sites. See site notes.
9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	C	DOF has not yet identified any HCV attributes that cross ownership boundaries. However, Nature Preserves manages some HCVs in cooperation with other adjacent public and private reserves. Some of these HCVs are not on DOF-managed properties, however.
<b>9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</b>	C	
9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	Division of Nature Preserves undertakes monitoring of HCVF. See response to CAR 2011.15 in 2012 report. Closure: DoF's updated HCVF documents address Indicator 9.4.a. Monitoring is the responsibility of Nature Preserves. See State HCVF description in Appendix 10 of the 2012 FSC Surveillance Audit Report.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	Nature Preserve personnel requested DoF assistance with periodic burns at the Leavenworth Barrens, which had been completed in spring 2015 (see site notes).  DoF has been working on an Indiana Bat HCP for some time. In the meantime, DoF applies its interim guidelines for Indiana Bat. DoF wildlife specialist indicates that other bat species may be at risk due to White-nose syndrome and that it awaits further information from cooperating organizations and federal approval of its submitted HCP and EA.
<b>Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and</b>		

<b>conservation of natural forests.</b>		
<b>10.1 The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.</b>	NA	SCS has determined that Indiana State Forests do not have plantations as defined in P10.

## Appendix 6 – Chain of Custody Indicators for FMEs

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

REQUIREMENT	C/NC	COMMENT/CAR
<b>1. Quality Management</b>		
1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.	C	Overall authority lies with the Certification Coordinator, Brenda Huter. Since timber sale administration is conducted at the level of each state forest, responsibilities are defined per job titles.
1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	Indiana State <a href="#">Records Retention</a> Regulations require all accounting-related records such as timber harvests be kept for a minimum of 10 years. Training records are kept digitally for the employees’ term of employment.

<p>1.3 The FME shall define its forest gate(s) (check all that apply):  <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i></p>		<p><b>Stump</b>  <input type="checkbox"/> <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.</i></p> <p><b>On-site concentration yard</b>  <input type="checkbox"/> <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p><b>Off-site Mill/Log Yard</b>  <input type="checkbox"/> <i>Transfer of ownership occurs when certified-product is unloaded at purchaser's facility.</i></p> <p><b>Auction house/ Brokerage</b>  <input type="checkbox"/> <i>Transfer of ownership occurs at a government-run or private auction house/ brokerage.</i></p> <p><b>Lump-sum sale/ Per Unit/ Pre-Paid Agreement</b>  <input checked="" type="checkbox"/> <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.</i></p> <p><b>Log landing</b>  <input type="checkbox"/> <i>Transfer of ownership of certified-product occurs at landing/yarding areas.</i></p> <p><input type="checkbox"/> <b>Other (Please describe):</b></p>
<p>1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.</p>	<p>C</p>	<p>There is no risk of mixing since FME only makes sales of standing timber through lump-sum sales, which means that the purchaser takes legal possession prior to the transport of harvested materials and is therefore responsible for maintaining the chain of custody.</p>
<p>1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements.  <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation.</i></p>	<p>C</p>	<p>No processing occurs prior to the transfer of ownership.</p>
<p><b>2. Product Control, Sales and Delivery</b></p>		

<p>2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).</p>	<p>C</p>	<p>DNR identifies its COC claim and FSC code in timber sale contracts. Stumpage purchasers are notified that upon severance from the stump, all COC procedures become the responsibility of the purchaser.</p>												
<p>2.2 The FME shall maintain records of quantities/volumes of FSC-certified product(s).</p>	<p>C</p>	<p>FME maintains records of all pre-harvest volumes of timber products. All are sold as certified regardless of whether or not the purchaser maintains COC.</p>												
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> <li>a) name and contact details of the organization;</li> <li>b) name and address of the customer;</li> <li>c) date when the document was issued;</li> <li>d) description of the product;</li> <li>e) quantity of the products sold;</li> <li>f) the organization’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code;</li> <li>g) clear indication of the FSC claim for each product item or the total products as follows: <ul style="list-style-type: none"> <li>i. the claim “FSC 100%” for products from FSC 100% product groups;</li> <li>ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups.</li> </ul> </li> <li>h) If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other.</li> </ul>	<p>C</p>	<p>The State Forest Timber Sale Contract template includes all information a)-g).</p> <p>The following sale contracts were examined and found to be conformant:</p> <p>Clark State Forest Sales</p> <table border="0"> <tr> <td>6301301</td> <td>Sep 2012</td> </tr> <tr> <td>6301502</td> <td>Apr 2015</td> </tr> <tr> <td>6301401</td> <td>Mar 2014</td> </tr> </table> <p>Harrison-Crawford Sales</p> <table border="0"> <tr> <td>6341501</td> <td>Jan 2015</td> </tr> <tr> <td>6341406</td> <td>Jun 2014</td> </tr> <tr> <td>6341404</td> <td>Oct 2013</td> </tr> </table>	6301301	Sep 2012	6301502	Apr 2015	6301401	Mar 2014	6341501	Jan 2015	6341406	Jun 2014	6341404	Oct 2013
6301301	Sep 2012													
6301502	Apr 2015													
6301401	Mar 2014													
6341501	Jan 2015													
6341406	Jun 2014													
6341404	Oct 2013													
<p>2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product.</p> <p><b>Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2</b></p>	<p>C</p>	<p>FME does not issue delivery documents (trip tickets); COC procedures become the responsibility of the purchaser upon severance of timber from the stump.</p>												

<p>2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company’s webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria:</p> <ul style="list-style-type: none"> <li>a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document;</li> <li>b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence;</li> <li>c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence.</li> </ul> <p><i>FSC-ADVICE-40-004-05</i></p>	<p>NA</p>	<p>No delivery documents used.</p>
<p><b>3. Labeling and Promotion</b></p>		<p><input type="checkbox"/> n/a</p>
<p>3.1 Describe where/how the organization uses the SCS and FSC trademarks for promotion.</p>	<p>C</p>	<p>The Group Manager uses FSC trademarks on public Internet pages and in educational publications and news releases.</p>
<p>3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.</p>	<p>C</p>	<p>The Certification Coordinator provided a log (below) of trademark use authorizations from SCS.</p> <p>The auditor sampled web pages using FSC trademarks and observed an FSC license code or other elements of an FSC promotional panel. Trademark registration symbols were used as required.</p>



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## My Approval Request History

SCS-COC-00099N - Indiana Division of Forestry - Properties

Associate:  ▼

Case#	Created By	Submitted Date	Status	Request Type	Job#	Job Name	Site Name	Approver
138387		07/22/2015	Approved	Off-Product		BMP Monitoring Results		Gabriela Chavez
133561		04/09/2015	Approved	Off-Product		Strategic Plan	Central Office	Jillian Van Luchem
132939		03/26/2015	Approved	Off-Product		Division of Forestry Annual Report	Central Office	Michelle Tuyen
127152		11/19/2014	Approved	Off-Product		State Forest Certification Webpages	Central Office	Michelle Tuyen

3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.

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As described above.

### 4. Outsourcing

n/a

4.1 The FME shall provide the names and contact details of all outsourced service providers.

4.2 The FME shall have a control system for the outsourced process which ensures that:

- a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership;
- b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement;
- c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing;
- d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use.

### 5. Training and/or Communication Strategies

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

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All FME staff involved in timber sale administration have been trained in contract administration and the use of timber sale templates that contain FME's FSC code and claim. Auditor viewed staff training records at Clark State Forest.

<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).</p>	<p>C</p>	<p>FME staff receive COC-related training. Foresters demonstrated how training records are logged in an online database administered by the central office.</p>
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