



# Forest Management Certification Review

Annapolis, MD

December 12, 2011

**Attendance** :: Steve Koehn, Kip Powers, Mike Schofield, Alex Clark, Skip Jones (Parker Forestry), Wade Dorsey, Bob Webster, Mark Beals, Jack Perdue

## AGENDA

### 1. FSC CARS (15)

- All 2010 CARs are closed
- **Major CARs**
  - All 2011 Major CARs have Been closed
- **2011.1 REQUESTED CORRECTIVE ACTION**
  - DNR must implement actions designed to curtail unauthorized activities (ORV use) and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.
- **2011.15 REQUESTED CORRECTIVE ACTION**
  - DNR must ensure that they have 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.

### Minor CARs

See **Summary of Corrective Action Requests**

### 2. SFI CARS (4)

- All 2010 CARs are closed
- Four (4) 2011 Minor CARs
- See **Summary of Corrective Action Requests**

### 3. SFI and FSC standards review

### 4. Other discussion

- chain of custody information was put into all timber sale contract documentation.
- Roads maintenance - State Highway Administration culvert replacement and road maintenance.
- Roads management policy.
- Retention policy - discussion about the pre-harvest meeting.
- Grievances - log all grievances.

- Ginseng – should we charge for harvesting?

#### Steve's Goals for State Forests

1. Roads inventory and maintenance.
  2. Improve for stocking.
  3. Improved trail system
- An ORV trail is being considered at Savage River State Forest on Compartment 47. It is an agreement shortlist.
  - We have to establish the grievances policy, we should keep it simple.
  - The to our annual work plans ID team notes summary websites not visited.
  - Put our Sustainable Forest Management Plans online for public comment on March 1, 2012.
  - Invasiveness – meet with heritage on how to do equipment, power washing in a practical way. Where? Winter? Prioritize?
  - Representative Sample Areas will be first developed by the state forest managers then vetted through the ID team using timber type.
  - We need to update the Summary of Corrective Action Requests.

Maryland DNR Forest Service  
 Forest Certification 2011  
 Summary of Corrective Action Requests  
 Updated: 03/13/2012, 12/8/2011

**MAJOR Corrective Action Requests (3 months)**

**FSC 2011.15 REQUESTED CORRECTIVE ACTION**

Ref: 1.5.b

DNR must implement actions designed to curtail unauthorized activities (ORV use) and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.

Issue	Progress	Next Step	Expected Completion	Status
ORV	<ul style="list-style-type: none"> <li>ORV trails closed, stakeholder group to review possible sites.</li> </ul>	<ul style="list-style-type: none"> <li>Await stakeholder group outcomes</li> <li>Review possible sites</li> </ul>	NA	CAR closed Sep 2011

**FMU Response:**

Off-Road-Vehicle (ORV) use has been a highly contested and an emotional issue on Maryland DNR lands for many years. Resource professionals have worked to reduce and mitigate the most problematic trails for years but the growing use of these recreational vehicles has grown beyond the budgets, staffing means and ability for the resource to recover.

As a result of these facts and resource conflicts the Maryland DNR Forest Service (MFS) has permanently closed the problematic and unsustainable ORV trails in Western Maryland and the Eastern Shore since the April 2011 audit.

A stakeholder-involved process has begun to determine if other trails can be located in more appropriate and sustainable locations. The MFS has also drafted a Forest Roads Management for Forest Operations on Maryland State Forests which will invoke a systematic inventory of the state forest roads, including ORV trails. This plan will place all road segments and drainage features into a GIS-based identification system and will allow the development of a priority plan for road maintenance and feature replacement which will be incorporated into annual work plans for each state forest.

The roads inventory has begun and should be completed on the western state forests by fall 2013 and well underway on the Eastern Shore by then. Arrangements have been made with State permitting agencies to streamline the culvert replacement process. The systematic identification of road segments and features with use of a regularly updated inventory will help focus staff and budget resources to the highest priority locations.

See attachment:

**SF\_ForestRoadsManagementPlan\_v1-4.doc**

See URLs:

DNR Closes Three Off-Road Vehicle Trails: Agency Creates ORV Stakeholder Work Group

<http://dnr.maryland.gov/dnrnews/pressrelease2011/050611b.asp>

DNR Announces Results Of Off-Road Vehicle Trail Studies

<http://www.dnr.maryland.gov/dnrnews/pressrelease2011/032211.asp>

DNR Announces Interim Results Of Recent Off-Road Vehicle Trails Meeting

<http://www.dnr.maryland.gov/dnrnews/pressrelease2011/033011.asp>

#### **FSC 2011.1 REQUESTED CORRECTIVE ACTION**

Ref: 8.3.a

DNR must ensure that they have 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.

Issue	Progress	Next Step	Expected Completion	Status
Chain of Custody	<ul style="list-style-type: none"> <li>• CoC policy has been completed and approved</li> <li>• Contracts have been revised w/ CoC</li> </ul>	<ul style="list-style-type: none"> <li>• CoC training for managers &amp; loggers</li> <li>• contract revisions online</li> <li>• documentation</li> </ul>	2/29/12	CAR closed Sep 2011

**FMU Response:**

Maryland DNR Forest Service has established a chain of custody policy through the **Chain-of-Custody Documented Control System.**

See attachment:

**MD-DNR\_FSC\_CoC\_Procedures\_v3.doc**

**MINOR Corrective Action Requests (due next audit)**

**FSC 2011.2 REQUESTED CORRECTIVE ACTION**

Ref: 4.5.b.; FSC-STD-20-001 V3-0, 22

DNR shall provide 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, DNR shall follow appropriate dispute resolution procedures. Such a procedure shall ensure that certificate holders:

- keep a record of all complaints made known to them relating to compliance with FSC requirements (see also indicator 8.2.d.4);
- make these records available to SCS upon request;
- take appropriate action with respect to such complaints and any deficiencies found in forest management that affect compliance with the requirements for certification; and
- document the actions taken.

Issue	Progress	Next Step	Expected Completion	Status
Grievances Policy	Templates and policies have been established.	<ul style="list-style-type: none"> <li>• Review relevant FSC standards</li> <li>• Develop policy</li> <li>• Put policy online</li> </ul>	Finalized by 4/20/12	In progress

**FMU Response:**

A State Forest Management Grievance Policy has been created and implemented that addresses these issues.

See attachment: **MD\_SFM\_Grievance\_Policy\_v1-o.doc**

**FSC 2011.3 REQUESTED CORRECTIVE ACTION**

Ref: 5.3.b

DNR must implement measures to ensure that harvest practices are effectively managed to minimize soil compaction, rutting and erosion.

Issue	Progress	Next Step	Expected Completion	Status
Soils Policy	<ul style="list-style-type: none"> <li>• Rutting Policy drafted.</li> </ul>	<ul style="list-style-type: none"> <li>• Disseminate and implement</li> </ul>	12/31/2011	Policies completed

	<ul style="list-style-type: none"> <li>• Roads Maintenance Policy drafted.</li> </ul>	<ul style="list-style-type: none"> <li>• Include in updated Policy Manual</li> </ul>		
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**FMU Response:**

A Rutting Policy and Roads Maintenance Policy have been drafted and have been put into implementation.

See attachments:

**Rutting Guidelines FINAL DRAFT 12-07-11.doc**

**SF\_ForestRoadsManagementPlan\_v1-4.doc**

**FSC 2011.4 REQUESTED CORRECTIVE ACTION**

Ref: 6.5.d

The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, must be 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.

Note: FSC standard explicitly states that OHV use is not a customary use right (Guidance for Indicator 2.2.a)

Issue	Progress	Next Step	Expected Completion	Status
Roads/Trails design	<ul style="list-style-type: none"> <li>• Rutting Policy</li> <li>• ORV stakeholders group</li> </ul>	<ul style="list-style-type: none"> <li>• Review relevant standards</li> <li>• Include in updated Policy Manual</li> </ul>	12/31/2001 unknown	TBD

**FMU Response:**

A Roads Maintenance Policy has been drafted and is being implemented. A bill was introduced in the current session of the Maryland Legislature that would put over \$1 million into State Forest roads maintenance, primarily replacing culverts.

See attachments:

**SF\_ForestRoadsManagementPlan\_v1-4.doc**





**FSC 2011.5 REQUESTED CORRECTIVE ACTION**

Ref: 5.6.d

DNR shall utilize available information, and new information that can be reasonably gathered, to set harvesting levels for NTFPS (e.g., ginseng) that will avoid a depletion of their growing stocks or other adverse effects to the forest ecosystem. Harvesting levels shall be set for NTFPS that are harvested in significant commercial operations or where traditional or customary use rights may be impacted.

Issue	Progress	Next Step	Expected Completion	Status
NTFPS Policy	<ul style="list-style-type: none"><li>• Met with MDA, NHP &amp; NRP re: ginseng harvesting</li><li>• State Forest permits developed</li></ul>	<ul style="list-style-type: none"><li>• Continue to work with MDA Heritage &amp; NRP.</li><li>• Continue to monitor ginseng harvest levels</li></ul>	3/31/2012	Necessary work has been completed till next audit.

**FMU Response:**

As requested from the 2011 audit, the question was raised regarding the impact of the DNR State Forest ginseng harvesting policy has taken on the resource. A meeting between the permit issuing and harvest report agency MD Department of Agriculture (MDA), the agency responsible for protecting natural communities for the state, the Natural Heritage Program (NHP), and MD Forest Service met to discuss the issue more fully. While ginseng is listed as an S3 species by the NHP it was discovered there actually has not been a scientific inventory of population levels in Maryland. The ranking has been based casual observation.

The best method available that may reflect population levels over time is the harvest reports gathered by the ginseng program at MDA. This discussion focused on the harvest of naturally occurring ginseng on State Forests (records are kept that allow this distinction) and while the harvest levels have not been high, they have not been declining either.

Several actions were indentified and have since been implemented. One, for a licensed ginseng harvester to collect on State Forests they now must first gain permission from the State Forest office. Each forest has a permission form which can be issued upon request.

The enforcement agency for the harvesting policy is the DNR Police. The MDA-NHP-Forest Service team was invited to make a presentation at the Western Maryland regional meeting for the DNR Police to outline the ginseng harvesting issue. They were appreciative of our presentations and the new permission policy. The meeting certainly created a greater awareness of the issue with the enforcement portion of the equation.

Further analysis will be developed of the historical ginseng harvest levels to learn if there have been any trends or anomalies. Harvest levels tend to reflect the state of the economy. Informal interviews with more regular collectors have been suggested for near-future actions.

Also, the western Maryland State Forests are conducting a five-year forest inventory which includes the presence of ginseng on the inventory plots.

**FSC 2011.6 REQUESTED CORRECTIVE ACTION**

Ref: 6.1.b

DNR must adequately document their assessment of the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.

Issue	Progress	Next Step	Expected Completion	Status
Impacts Assessment	<ul style="list-style-type: none"> <li>• Checklist to be developed for use in all AWP proposals.</li> </ul>	<ul style="list-style-type: none"> <li>• Review relevant standards</li> <li>• Develop checklist</li> <li>• Disseminate policy</li> <li>• Amend TOO</li> </ul>	4/27/2012	Timber Operations Order (TOO) to be amended.

**FMU Response:**

The State Forest annual work plan silvicultural proposals will be based on the criteria outlined in FSC 6.1.a. Each proposal will address each of the following issues, thereby establishing a baseline documentation of conditions and building on this as each subsequent activity occurs: 1) Forest community types and development, size class and/or successional stages, and associated natural disturbance regimes; 2) Rare, Threatened and Endangered (RTE) species and rare ecological communities (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) Soil resources; and 6) Historic conditions on the FMU related to forest community types and

development, size class and/or successional stages, and a broad comparison of historic and current conditions.

This language will be amended into the MD DNR Forest Service's Timber Operations Order, which guides forest management activities and procedures on DNR State Forests.

**FSC 2011.7 REQUESTED CORRECTIVE ACTION**

Ref: 6.1.d

Management approaches developed to avoid or mitigate environmental impacts (Chapter 5) shall be made available to the public in draft form for review and comment prior to finalization.

Issue	Progress	Next Step	Expected Completion	Status
Environmental Impact Policy	<ul style="list-style-type: none"><li>SFMP public review ends 4/6</li></ul>	<ul style="list-style-type: none"><li>Review relevant standards</li><li>SFMP online</li></ul>	4/6/012	Completed

**FMU Response:**

The Sustainable Forest Management Plans for the western State Forests have been reviewed by the relevant DNR resource managers team (ID Team), the Citizens Advisory Committee and presented on the DNR website for review and comment by the public. The plans are available for downloading at the URL provided below.

**See URL:** [http://www.dnr.state.md.us/forests/sfmp\\_wmd/index.asp](http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp)

**FSC 2011.8 REQUESTED CORRECTIVE ACTION**

Ref: 6.3.f

DNR shall ensure that they maintain, enhance, or restore habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. Including:

a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and

b) vertical and horizontal complexity.

Trees selected for retention are generally representative of the dominant species found on the site.

Issue	Progress	Next Step	Expected Completion	Status
Retention	Retention Policy drafted and finalized	<ul style="list-style-type: none"><li>Disseminate finalized policy</li><li>Include in updated Policy Manual</li></ul>	4/20/2012	Completed

**FMU Response:**

The Forest Stand Retention For Forest Operations on Maryland State Forests was created to establish a policy regarding how retention would be maintained during regeneration harvests. Conformance to this policy will be checked on an annual basis during the DNR Forest Service's Internal Silvicultural Audits (ISA). These audits will be completed by the ID Team during the normal annual work plan reviews. This first year the ISA reviews included a team of the Regional Forester, Forest Manager & staff, Forest Resource Planning Program Manager (Forest Certification Scope Contact) and contractors (if appropriate).

See attached:

**FC\_RetentionPolicy\_ver4.doc**

**MD\_ForestHarvest\_Review\_Checklist\_v1-5\_field.doc**

**FSC 2011.9 REQUESTED CORRECTIVE ACTION**

Ref: 6.3.h

DNR must assess the risk of, prioritize, and, as warranted, develop and implement a strategy to prevent or control invasive species, including:

1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems;

2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;
3. eradication or control of established invasive populations when feasible: and,
4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.

Issue	Progress	Next Step	Expected Completion	Status
Invasive Species Policy	Some review of other policies	<ul style="list-style-type: none"> <li>• Gain support from TNC and NHP</li> <li>• Develop policy</li> <li>• Include in updated Policy Manual</li> </ul>	2/28/2012	In progress

**FMU Response:**

More information forthcoming.

**FSC 2011.10 REQUESTED CORRECTIVE ACTION**

Ref: 6.4.g

DNR must document the ecosystems that would naturally exist on the FMU, and assess the adequacy of their representation and protection in the landscape.

Issue	Progress	Next Step	Expected Completion	Status
Representative Sample Areas	Initial contact with NHP	<ul style="list-style-type: none"> <li>• Reinitiate with NHP</li> <li>• Meet with NHP</li> <li>• Run RSA analysis</li> </ul>	4/10/2012	TBD

**FMU Response:**

The Methodology for Locating Representative Sample Areas (RSA) for Naturally Occurring Ecosystems within the Region of Maryland State Forests was created in cooperation with the MD DNR Natural Heritage Program. This GAP analysis was developed using a spatial analysis of the surrounding regions to determine regional

ecosystems and necessary RSA designations on the FMU or other nearby protected lands that may represent those ecosystems. Final ecosystem data is being analyzed and RSA data layers updated.

See attachment:

**RSA\_Analysis\_Methodology\_v1-o.doc**

**FSC 2011.11 REQUESTED CORRECTIVE ACTION**

Ref: 7.1.b

DNR must ensure that management plans:

- Describe the natural disturbance regimes that affect the FMU (see Indicator 6.1.a).
- Include a description of insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).
- Describe biological control agents being used, applications, and how the management system conforms to Criterion 6.8.
- Describe the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).
- Describe and justify the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.
- Describe invasive species conditions, applicable management objectives, and how they will be controlled.

Issue	Progress	Next Step	Expected Completion	Status
Natural Disturbance Regimes assessment	<ul style="list-style-type: none"><li>• Some discussion</li></ul>	<ul style="list-style-type: none"><li>• Review relevant standards</li><li>• Revise WMD SFMPs</li></ul>	3/31/2012	Completed

**FMU Response:**

The Sustainable Forest Management Plans for the western State Forests have been reviewed by the relevant DNR resource managers team (ID Team), the Citizens Advisory Committee and presented on the DNR website for review and comment by the public. The plans are available for downloading at the URL provided below.

See URL: [http://www.dnr.state.md.us/forests/sfmp\\_wmd/index.asp](http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp)

**FSC 2011.12 REQUESTED CORRECTIVE ACTION**

Ref: 8.2.d.1

DNR must 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.

Issue	Progress	Next Step	Expected Completion	Status
Environmental Impact Policy	<ul style="list-style-type: none"><li>• Internal Silvicultural Audit (ISA) process developed</li><li>• IA process has begun</li><li>• ISAs completed</li></ul>	<ul style="list-style-type: none"><li>• Review relevant standards</li><li>• Conduct ISA</li></ul>	3/31/2012	Completed

**FMU Response:**

An Internal Silvicultural Audits (ISA) procedure has been established to address the environmental impact of silvicultural operations on State Forests. These audits will be completed by the ID Team during the normal annual work plan reviews. This first year the ISA reviews included a team of the Regional Forester, Forest Manager & staff, Forest Resource Planning Program Manager (Forest Certification Scope Contact) and contractors (if appropriate).

See attached:

**MD\_ForestHarvest\_Review\_Checklist\_v1-5\_field.doc**

**MD\_ISA\_2012\_EXAMPLES.pdf**

**FSC 2011.13 REQUESTED CORRECTIVE ACTION**

Ref: 8.2.d.2

DNR must implement a monitoring program to assess the condition and environmental impacts of the forest-road system.

Issue	Progress	Next Step	Expected Completion	Status
Roads Inventory &	<ul style="list-style-type: none"><li>• Roads Maintenanc</li></ul>	<ul style="list-style-type: none"><li>• Document roads</li></ul>	TBD	In progress



Assessment	<ul style="list-style-type: none"> <li>• e policy drafted and finalized</li> <li>• Roads Inventory is in progress</li> </ul>	<ul style="list-style-type: none"> <li>• inventory progress</li> <li>• Roads inventory assessment</li> <li>• Include in updated Policy Manual</li> </ul>		
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**FMU Response:**

The MFS has drafted a Forest Roads Management for Forest Operations on Maryland State Forests which will invoke a systematic inventory of the state forest roads, including ORV trails. This plan places all road segments and drainage features into a GIS-based identification system and will allow the development of a priority plan for road maintenance and feature replacement which will be incorporated into annual work plans for each state forest.

The roads inventory has begun and should be completed on the western state forests by fall 2013 and well underway on the Eastern Shore by then. Arrangements have been made with State permitting agencies to streamline the culvert replacement process. The systematic identification of road segments and features with use of a regularly updated inventory will help focus staff and budget resources to the highest priority locations.

See attachment:

**SF\_ForestRoadsManagementPlan\_v1-4.doc**

**FSC 2011.14 REQUESTED CORRECTIVE ACTION**

Ref: 9.2.b

DNR must ensure that there is 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.

Issue	Progress	Next Step	Expected Completion	Status
HCVF Review	<ul style="list-style-type: none"> <li>• HCVF has been defined</li> </ul>	<ul style="list-style-type: none"> <li>• Submit SFMPs for public</li> </ul>	4/27/12	In progress

	<ul style="list-style-type: none"> <li>• SFMP are online for public review</li> <li>• Public comment period ended 4/6/12</li> </ul>	comment period <ul style="list-style-type: none"> <li>• Summarize public comments</li> <li>• Post comments online</li> </ul>		
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**FMU Response:**

The Sustainable Forest Management Plans for the western State Forests, including HCVF designations, have been reviewed by the relevant DNR resource managers team (ID Team), the Citizens Advisory Committee and presented on the DNR website for review and comment by the public. The plans are available for downloading at the URL provided below.

**See URL:** [http://www.dnr.state.md.us/forests/sfmp\\_wmd/index.asp](http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp)

## Observations

### OBS 2011.1

Ref: 4.4.a

DNR should better document social impact assessments and monitoring, and ensure that the following topics are covered:

- Archeological sites and sites of cultural, historical and community significance (on and off the FMU);
- Public resources, including air, water and food (hunting, fishing, collecting);
- Aesthetics;
- Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health;
- Community economic opportunities;
- Other people who may be affected by management operations.

Issue	Progress	Next Step	Expected Completion	Status
Social Impact Assessments and Monitoring	None	<ul style="list-style-type: none"><li>• Review relevant standards</li><li>• Review other submittals</li></ul>	3/31/2012	Not started

### FMU Response:

Timber Operations Order requires annual work plan (AWP) review by ID Team, Citizens Advisory Committee and the public. Any other proposed activities outside of the normal AWP review, whether initiated by the State Forest Manager, other DNR resource professionals, research institutions (such as universities or conservation organizations), adjacent landowners or any other group must first be submitted for review and approval through a DNR Project Review. Examples of such proposals have included: ROW issues with neighboring landowners, ad hoc salvage harvests, road realignments, acid mine mitigation, easement requests, adventure sporting events, insect studies, and building razing. These reviews include DNR professionals and the Maryland Historical Trust (for historical and archaeological concerns).

In 2009, a multi-stakeholder partnership, including the MD DNR Forest Service, engaged the public through five listening sessions across the state, culminating with the Forestry Summit. This effort resulted in a public survey of forestry leaders and other interesting groups. Four key issues were identified along with strategies and recommendations for addressing these issues. Priority number one under the key issue

Maintaining Viable Forests and a Viable Forest Industry in Maryland was to: Inventory and manage State-owned forests as sustainable working forests.

The report is available at:

<http://www.dnr.state.md.us/forests/pdfs/sas/ForestrySummitReport.pdf>

See attachments:

**PR\_Procedures\_MFS\_10-27-10.doc**

**CAC\_purpose-statement.doc**

**OBS 2011.2**

Ref: 4.4.d

DNR should take additional steps to ensure that 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.

Issue	Progress	Next Step	Expected Completion	Status
Public Notifications	Done	<ul style="list-style-type: none"><li>Announce public reviews to CAC</li></ul>	3/1/12	Completed

**FMU Response:**

The Citizens Advisory Committee (CAC) for each of the State Forests, as part of their duties, has the opportunity to review all State Forest annual work plans and Sustainable Forest Management Plans. This serves as the first layer in our public notification policy. The next step is to post these plans on the DNR website and announce a 30-day review and comment period through media outlets. The announcements went to every major news outlet in Maryland including Patch.com and even several blogs. Personal announcements were made directly to each CAC member by the Forest Manager.

**OBS 2011.3**

Ref: none

DNR, and employees and contractors, should take additional steps to ensure that they have the equipment and training necessary to respond to hazardous spills.

**FMU Response:**

The requirement to have spill kits on site by the harvesting contractor has been added to our timber sale contracts. Spill kit information sheets will be enclosed as part of all timber sale contract documentation as part to the bid package.

**OBS 2011.4**

Ref: 7.3.a

DNR should take additional steps to ensure workers are qualified to properly implement the management plan, particularly the management plan revisions necessary for full FSC conformance.

Issue	Progress	Next Step	Expected Completion	Status
Manager Qualifications	Not started	<ul style="list-style-type: none"><li>• Review relevant standards</li><li>• Review other submittals</li></ul>	3/31/2012	Completed

**FMU Response:**

Since the 2011 audit, the MD Forest Service state forest managers and other staff have met formally twice focusing on forest certification compliance and relevant issues. An additional meeting included the State Forester, forestry contractor staff, forest managers, regional foresters, and other headquarters staff to focus on 2011 certification standard non-conformances. A training session was offered in February 2012 to the Western Maryland Master Logger program regarding forest certification and policies (e.g. rutting, retention, chain-of-custody, roads maintenance) that have been implemented as a result of the 2011 audit. The training was well attended with 15 participants.

Also since the 2011 an Internal Silvicultural Audit has been developed and implemented. This resulted in the visit and evaluation of nine harvest sites across the state. All state forests have implemented a formal documented pre-harvest meeting with the harvest contractor. The forest staff communicates the intention of the harvest and any particular issues that the contractor should be aware of.

**OBS 2011.5**

Ref: 6.2.d

DNR should set harvesting levels, conservation zones, and or protection areas (Indicator 6.2.d) for NTFPs that will avoid a depletion of their growing stocks or other adverse effects to the forest ecosystem.

Issue	Progress	Next Step	Expected Completion	Status
NTFP Harvest Levels	<ul style="list-style-type: none"><li>• Met with MDA, NHP &amp; NRP</li><li>• Instituted SF permits</li></ul>	<ul style="list-style-type: none"><li>• After ginseng season, meet again the team to review status and necessary actions</li></ul>	2/28/2012	Continue monitoring and communications with MDA & Heritage.

**FMU Response:**

See FMR Response for **FSC 2011.5**

**Sustainable Forestry Initiative**

April 2011

**MINOR NON-CONFORMANCES**

1. Performance Measure 2.3 states “Program Participants shall implement forest management practices to protect and maintain forest and soil productivity.”

Some trails and permanent roads in the western forests have drainage provisions (crowns, road surfaces, cross drainage) which are not maintained adequately, resulting in erosion that is avoidable. ORV trails in particular are causing off-trail resource damage including sedimentation into pristine streams and damage to sensitive wetlands soils; much of this ORV-related damage involves unauthorized uses, but recent significant increased levels of trail use appear to be contributing to the problem. Note: Following the audit selected ORV trails on three western state forests were permanently closed.

Issue	Progress	Next Step	Expected Completion	Status
ORV/Roads Policy	<ul style="list-style-type: none"> <li>• ORV trails closed</li> <li>• Roads Maintenance Policy drafted</li> </ul>	<ul style="list-style-type: none"> <li>• Await stakeholder recommendations</li> <li>• Review proposed ORV trails</li> <li>• Include in updated Policy Manual</li> </ul>	3/31/2012	Completed

**FMU Response:**

See Roads Maintenance document attached and reference above.

2. Indicator 2.3.6 requires “Criteria that address harvesting and site preparation to protect soil productivity.”

The western forests do not have criteria defining acceptable levels of rutting during harvests.

Issue	Progress	Next Step	Expected Completion	Status
Rutting	<ul style="list-style-type: none"> <li>• Rutting</li> </ul>	<ul style="list-style-type: none"> <li>• Finalize</li> </ul>	10/31/2011	Completed

	policy finalized	Rutting policy <ul style="list-style-type: none"> <li>• Include in updated Policy Manual</li> </ul>		
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**FMU Response:**

See Rutting document attached and reference above.

3. Indicator 4.1.4 calls for "Development and implementation of criteria, as guided by regionally appropriate best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees."

Issue	Progress	Next Step	Expected Completion	Status
Retention policy	<ul style="list-style-type: none"> <li>• Retention policy finalized</li> </ul>	<ul style="list-style-type: none"> <li>• Finalize Retention policy</li> <li>• Include in updated Policy Manual</li> </ul>	10/31/2011	In progress

Retention of stand-level wildlife habitat elements such as snags, mast trees, down woody debris has not been consistent (western forests).

Maryland DNR Forest Service has developed plans to address these issues. Progress in implementing these corrective action plans will be reviewed in subsequent surveillance audits.

**FMU Response:**

See Retention document attached and reference above.