



## **Minnesota DNR SFI Summary Surveillance Audit Report**

The SFI Program of the Minnesota DNR has achieved continuing conformance with the SFI Standard®, 2010-2014 Edition, according to the NSF-ISR SFIS Certification Audit Process.

NSF-ISR initially certified Minnesota DNR to the SFI Standard in 2005 and recertified the organization in 2010 and in 2013. This report describes the required annual Surveillance Audit designed to review all changes in operations, the management review system, and efforts at continuous improvement. In addition, a subset of SFI requirements were subject to review.

The surveillance audit was performed by NSF-ISR on October 6-10, 2014 by an audit team headed by Mike Ferrucci, SFI Lead Auditor supported by JoAnn Hanowski, Avian Ecologist and by FSC Lead Auditor Paul Pingrey. Audit team members fulfill the qualification criteria for conducting SFIS Certification Audits of “Section 9. SFI 2010-2014 Audit Procedures and Auditor Qualifications and Accreditation” contained in Requirements for the SFI 2010-2014 Program: Standards, Rules for Label Use, Procedures, and Guidance.

The scope of the SFIS Audit included land management operations. Forest practices that were the focus of field inspections included those that have been conducted since the previous field audit conducted in 2012. Practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example). In addition, all of SFI obligations to promote sustainable forestry practices, to ensure appropriate training of people involved in the forest management program, to support public outreach including involvement in public land management planning processes, and to incorporate continual improvement systems were reexamined during the audit. Use of the SFI logo and the requirement to provide a public of audit reports were also reviewed.

As with the initial certification, several of the SFI Performance Measures were outside of the scope of Minnesota DNR’s SFI program and were excluded from the scope of the SFI Recertification Audit as follows:

- Indicator 2.1.4 involving planting exotic species
- Indicator 2.1.7 involving planting non-forested areas
- Indicator 3.2.5 involving situations where the state lacks BMPs
- Objectives 8 through 13 for procurement

No indicators were modified.

## **SFIS Recertification Audit Process**

The review was governed by a detailed audit protocol designed to enable the audit team determine conformance with the applicable SFI requirements. The process included the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices. Documents describing these activities were provided to the auditor in advance, and a sample of the available audit evidence was designated by the auditor for review.

During the audit NSF-ISR reviewed a sample of the written documentation assembled to provide objective evidence of SFIS Conformance. NSF-ISR also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF-ISR SFI-SOP. NSF-ISR also selected and interviewed stakeholders such as contract loggers, landowners and other interested parties, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented.

Minnesota DNR qualified for multi-site sampling as provided within the Requirements for the SFI 2010-2014 Program: Standards, Rules for Label Use, Procedures, and Guidance, Section 9 Auditing Requirements. The program has 17 forestry work areas that are considered sites. (Note: Lands administered by the Division of Wildlife, wildlife activities, and wildlife work areas within the certified portion of the state are also within the scope of the audit; because these generally overlap geographically with forestry work areas the decision has been made to base sampling on the Forestry Division's work areas. The audit visited 2 forestry work areas, multiple small Wildlife Management Areas (WMAs) within several wildlife work areas, and reviewed the centralized management of the organization.

The possible findings for specific SFI requirements included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the SFIS. Surveillance Audits generally focus on conformance issues and do not generally address exceptional practices, but some aspects of the program were found to exceed the requirements and are noted below.

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The next surveillance audit should be conducted in September or early October 2015.

## **Minnesota DNR's Lands and Sustainable Forestry Programs**

Minnesota DNR manages 5.4 million acres of state lands throughout Minnesota, following an interdisciplinary approach designed to integrate the harvesting of forest products, management of wildlife habitat, the protection of special sites, and the provision of extensive recreational opportunities. These lands encompass a variety of forest types, including aspen, white, red, and jack pine, mixed lowland conifers, oak-hickory, and northern hardwoods. Forest products produced include timber, pulpwood, firewood, cabin logs, poles, and other specialty products. 4,979,253 acres are within the scope of the SFI 2010-2014 Standard certificate.

“Background: The Minnesota Department of Natural Resources (MN DNR) sought and obtained dual forest management certificates on December 31, 2005 under two internationally recognized, independent, credible forest management certification systems: the Forest Stewardship Council (FSC) and the Sustainable Forestry Initiative (SFI). MN DNR's certificates have since grown from 4.47 to 4.96 million acres of state administered forestlands certified under the FSC standard and 4.98 million acres certified under the SFI standard. MN DNR is one of the largest single certificate holders in the country. Along with its counterparts in Wisconsin and Michigan, MN DNR has been a leader in forest certification and combined, the Great Lakes States account for over 50% of the forest acres in the United States certified under FSC. Currently, there are over 8.4 million acres of forestland in the state of Minnesota certified under FSC and/or the Sustainable Forestry Initiative (SFI) program.

Forest management certification is consistent with MN DNR's mission and responsibility *'to work with citizens to conserve and manage the state's natural resources, to provide outdoor recreation opportunities, and to provide for commercial uses of natural resources in a way that creates a sustainable quality of life.'* Therefore, MN DNR is looking to continue with its forest management certification efforts.” Source: Minnesota Department of Natural Resources

Lands included in the SFI Certification = 4,979,253 acres comprised of:

- Forestry Administered  
4,078,843 acres
- Wildlife Administered  
787,387 acres
- Fisheries Administered Lands in  
Lake County 8,750 acres
- Wildlife Administered LUP  
(Land Utilization Project)  
81,673 acres
- Trails Administered Lands  
22,600 acres

## **Overview of Audit Findings**

Minnesota DNR's SFI Program was found to be in overall conformance with the SFIS Standard, and was recommended for continuing certification pending completion of corrective action plans for 2 Minor Non-conformances that are described below.

### **SFI Minor Non-conformances**

There were two (2) new Minor Non-conformances:

SFI Indicator 3.1.1 requires a "Program to implement state or provincial best management practices during all phases of management activities."

In two places in a completed harvest in the Daughters of the American Revolution State Forest more than minor volumes of logging slash and/or wood chips were placed in wetlands but not removed. The greatest volume was associated with a landing (loading area) apparently initially placed adjacent to a wetland but which expanded into the wetland. In other places the material was associated with skid trails crossing wetland areas.

SFI Indicator 4.1.4 requires the "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."

Policies for the retention of stand-level wildlife habitat elements were not followed in all cases.

Minnesota DNR has developed plans to address these new issues. Progress in implementing the remaining open corrective action plans will be reviewed in subsequent surveillance audits.

### **SFI Opportunities for Improvement**

Three (3) opportunities for improvement were also identified:

SFI Indicator 1.1.1 requires, in part "Forest management planning..." and SFI Indicator 14.1.1 requires "Access to relevant laws and regulations in appropriate locations. There is an opportunity to provide clear written guidance regarding how policies and practices are to be modified, if at all, on trust lands.

SFI Indicator 2.1.6 requires "Planting programs that consider potential ecological impacts of a different species or species mix from that which was harvested." There is an Opportunity for Improvement in the use of ecological information and landscape-scale plans when making site-level silvicultural decisions affecting cover type changes.

SFI Indicator 20.1.3 requires "Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2010-2014 Standard." The 2014 MN Legislative Audit of Forestry Program contains several recommendations that closely track with recent and past findings of internal audits and third-party certification audits. There is an

opportunity to coordinate management review of and response to these findings, with an emphasis on findings which have persisted.

These findings do not indicate a current deficiency, but served to alert the organization to areas that could be strengthened or which could merit future attention.

### **Exceeds the Requirements**

SFI Indicator 4.1.1 requires a “Program to promote the conservation of native biological diversity, including species, wildlife habitats and ecological community types.” The use of the NPC ECS to classify sites and improve management decisions is an exceptional practice.

SFI Performance Measure 5.4 states that “Program Participants shall support and promote recreational opportunities for the public.” While Indicator 5.4.1 requires the organization to “Provide recreational opportunities for the public, where consistent with forest management objectives.” Minnesota DNR promotes recreational use of the forests and regularly modifies timber management to better accommodate such use. As such the SFI Standard is exceeded.

### **2013 SFI Minor Non-conformances Reviewed During the 2014 Audit**

Three minor non-conformance were issued during the 2013 re-certification audit; all three were reviewed during the 2014 audit, with conformance found for all three.

1) Minor NC 2013: MNDNR was not adequately documenting the assessed impacts of management activities. “Joint site visit” consultations under the department's interdisciplinary coordination framework are not consistently being recorded in timber sales records, resulting in confusion about whether assessments actually occurred after employees with personal knowledge transfer and or retire to other positions. SFI Indicator 6.1.2 requires “Appropriate mapping, cataloging and management of identified special sites.”

This finding has been closed based in part on the automation of the process for recording consultations and decisions resulting from these consultations, initially by using a new tool (a simplified gateway) designated Separate Stand Exam Layer aka SSEL which will then link to the Silviculture and Roads Module (SRM) which is used to develop the appraisal, ensuring that all interdisciplinary comments and joint site visits are incorporated into sale documents and contracts.

2) Minor NC 2013: There had been ineffective implementation of BMP's on timber permit B011967 to protect rivers, streams, lakes and other water bodies. SFI Indicator 3.2.3 requires “Implementation of plans to manage or protect rivers, streams, lakes, and other water bodies.”

This finding has been closed, based on information provided by MNDNR including photos of current conditions taken September 2014, a written narrative, and then a presentation from Dick Rossman. Key on-site activities have included reworking the culvert, seeding portions of the temporary road. Preventive actions have includes a new training module, initially delivered early October, 2014, with a focus on erosion control on active roads.

3) Minor NC 2013: There had been ineffective documentation of harvest plans. SFI Indicator 1.1.5 requires “Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans.”

This finding has been closed, based on MDNR’s response showing implementation of preventive actions, which involved training and covering the correct processes for re-appraisals.



### **General Description of Evidence of Conformity**

NSF’s audit team used a variety of evidence to determine conformance. A general description of this evidence is provided below, organized by SFI Objective.

**Objective 1. Forest Management Planning** - To broaden the implementation of sustainable forestry by ensuring long-term forest productivity and yield based on the use of the best scientific information available.

**Summary of Evidence** –The evidence of conformance for this indicator included:

- Subsection Forest Resource Management Plans (SFRMPs)
- Minnesota Forest Resources Council (MFRC) Site-Level Forest Management Guidelines
- Interdisciplinary Forest Management Coordination Framework
- ECS Native Plant Community Keys and linked Silvicultural Interpretations
- Minnesota Strategic Conservation Agenda
- MFRC Landscape Program which developed recommended desired outcomes, goals, and strategies for six Sections in Minnesota, and
- Inventory data and growth models.
- Selected management plans for wildlife management areas
- Silvicultural Prescription Worksheets and Timber Appraisal Reports for selected harvests

**Objective 2. Forest Productivity** - To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, soil conservation, afforestation and other measures.

**Summary of Evidence** – Field observations and associated records were used to confirm practices. Minnesota DNR has programs for reforestation, for protection against insects, diseases and wildfire, and for careful management of activities which could potentially impact soil and long-term productivity. Key field records including Silvicultural Prescription Worksheets, Timber Appraisal Reports, Permit Activity Reports, and other data from various database systems.

**Objective 3. Protection and Maintenance of Water Resources** - To protect water quality in streams, lakes and other water bodies.

**Summary of Evidence** – Field observations of a range of sites were the key evidence. Auditors visited portions of selected field sites that were close to water resources. MFRC Site-Level Forest Management Guidelines (BMPs) are also an important part of the program to protect water resources. Selected Permit Activity Reports were reviewed, and Timber Sale Administration Foresters were interviewed.

**Objective 4. Conservation of Biological Diversity including Forests with Exceptional**

**Conservation Value** To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote habitat diversity and the conservation of forest plants and animals, including aquatic species.

**Summary of Evidence** – Field observations, written plans and policies, use of college-trained field biologists, availability of specialists, and regular staff involvement in conferences and workshops that cover scientific advances were the evidence used to assess the requirements involved biodiversity conservation. The Interdisciplinary Forest Management Coordination Framework ensures that biodiversity issues are considered in forest management planning. Minnesota also has developed a comprehensive system of Representative Sample Areas (RSAs) and High Conservation Value Forests (HCVFs) which are protected and managed to provide for sensitive species and communities.

**Objective 5. Management of Visual Quality and Recreational Benefits** - To manage the visual impact of forest operations and provide recreational opportunities for the public.

**Summary of Evidence** – Field observations of completed operations and the implementation of policies for visual quality, including road zoning, were assessed during the evaluation. Maps of recreation sites, combined with field visits, helped confirm a strong recreation program.

**Objective 6. Protection of Special Sites** - To manage lands that are ecologically, geologically, or culturally important in a manner that takes into account their unique qualities.

**Summary of Evidence** – Field observations of completed operations, records of special sites, training records, and written protection plans were all assessed during the evaluation. The Minnesota Biological Survey (MBS) which is conducted county-by-county to search for rare plants, animals, and communities continues to be the core of the program. Minnesota also has developed an initial set of Representative Sample Areas (RSAs) and comprehensive pool of candidate High Conservation Value Forests (HCVFs) which are managed to protect and provide for sensitive species and communities. Some of these sites were visited to compare protections with maps and written information.

**Objective 7. Efficient Use of Forest Resources** - To promote the efficient use of forest resources.

**Summary of Evidence** – Field observations of completed operations, contract clauses, and discussions with supervising field foresters and with loggers provided the key evidence. Foresters monitor utilization during all harvests and consider the new biomass harvesting guidelines. Selected Permit Activity Reports were reviewed, and Timber Sale Administration Foresters were interviewed. The Division of Forestry has a Utilization and Marketing Program.

**Objective 14. Legal and Regulatory Compliance** -

Compliance with applicable federal, provincial, state and local laws and regulations.

**Summary of Evidence** – Field reviews of ongoing and completed operations were the most critical evidence. Regulatory compliance has been very strong.

**Objective 15. Forestry Research, Science, and Technology** - To support forestry research, science, and technology, upon which sustainable forest management decisions are based.

**Not reviewed during the 2014 SFI Audit.**

**Objective 16. Training and Education** -To improve the implementation of sustainable forestry practices through appropriate training and education programs.

**Summary of Evidence** – Training records of selected personnel, records associated with harvest sites audited, and logger interviews were the key evidence for this objective. Minnesota DNR provides support for the Minnesota Logger Education Program. Commitment to the SFI Standard was stated by Minnesota DNR Commissioner.

**Objective 17. Community Involvement in the Practice of Sustainable Forestry** -

To broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment to sustainable forestry, and publicly report progress.

**Summary of Evidence** – This objective was only partially reviewed during the 2014 SFI Audit. Interviews with staff and stakeholders and review of selected documents were sufficient to assess the requirements selected for review during this audit.

**Objective 18: Public Land Management Responsibilities** -

To support and implement sustainable forest management on public lands.

**Summary of Evidence** – Interviews and review of documents and correspondence were used to confirm the requirements.

**Objective 19. Communications and Public Reporting** - To broaden the practice of sustainable forestry by documenting progress and opportunities for improvement.

**Summary of Evidence** – Reports filed with SFI Inc. and the SFI Inc. website provided the key evidence.

**Objective 20. Management Review and Continual Improvement** - To promote continual improvement in the practice of sustainable forestry, and to monitor, measure, and report performance in achieving the commitment to sustainable forestry.

**Summary of Evidence** – Records of program reviews and internal audits, agendas and notes from management review meetings, and interviews with personnel from all involved levels in the organization were assessed. The department’s Forest Certification Implementation Team provides the critical role in program management and review.



## **Relevance of Forestry Certification**

Third-party certification provides assurance that forests are being managed under the principles of sustainable forestry, which are described in the Sustainable Forestry Initiative Standard as:

### **1. Sustainable Forestry**

To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitats, recreation, and aesthetics.

### **2. Forest Productivity and Health**

To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from

economically or environmentally undesirable levels of wildfire, pests, diseases, invasive exotic plants and animals and other damaging agents and thus maintain and improve long-term forest health and productivity.

### **3. Protection of Water Resources**

To protect water bodies and riparian zones, and to conform with best management practices to protect water quality.

### **4. Protection of Biological Diversity**

To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, and ecological or natural community types.

### **5. Aesthetics and Recreation**

To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.

### **6. Protection of Special Sites**

To manage forests and lands of special significance (ecologically, geologically or culturally important) in a manner that protects their integrity and takes into account their unique qualities.

### **7. Responsible Fiber Sourcing Practices in North America**

To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally and socially responsible.

### **8. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing**

To avoid wood fiber from illegally logged forests when procuring fiber outside of North America, and to avoid sourcing fiber from countries without effective social laws.

### **9. Legal Compliance**

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

### **10. Research**

To support advances in sustainable forest management through forestry research, science and technology.

### **11. Training and Education**

To improve the practice of sustainable forestry through training and education programs.

### **12. Public Involvement**

To broaden the practice of sustainable forestry on public lands through community involvement.

### **13. Transparency**

To broaden the understanding of forest certification to the SFI 2010-2014 Standard by documenting certification audits and making the findings publicly available.

### **14. Continual Improvement**

To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.

*Source: Sustainable Forestry Initiative® (SFI) Standard, 2010-2014 Edition*

**For Additional Information Contact:**

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