

## SCS FOREST MANAGEMENT CERTIFICATION SERVICES CORRECTIVE ACTION REQUEST (CAR) / OBSERVATION (OBS)

<b>Certificate holder/applicant</b>	<b>Maryland Forest Service</b>
CAR/OBS identified by (SCS representative)	Dave Wager, Mike Ferrucci, Anne Marie Kittredge
Date identified	05/26/11
Audit Type (where applicable)	2011 Surveillance Audit (2 <sup>nd</sup> annual audit)

*Copy and complete table for each nonconformity / opportunity for improvement detected*

		<b>CAR/OBS Number:</b>	<b>1.</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>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input checked="" type="checkbox"/>	— 3 months from date report finalized		
<input type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to (re)certification		
<input type="checkbox"/>	Other deadline (specify):		
<input type="checkbox"/>	N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: Indicator 1.5.b	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>			
<p>Audit team observed that when illegal or unauthorized activities occur, the forest owner or manager has not implemented actions to curtail such activities and correct the situation <b>to the extent possible</b>. While the Forest Service has undertaken some actions (e.g., posting signage, direction to Natural Resource Police to enforce trail regulations) to curtail unauthorized Off Road Vehicle (ORV) activity and associated resource damage, the audit team finds that such actions have not corrected the situation nor do they represent a set of actions that meet the “to the extent possible” requirement of this indicator. Additional actions to curtail unauthorized activity are necessary to demonstrate conformance with this FSC requirement.</p>			
<b>OTHER APPLICABLE STANDARD REFERENCES:</b>			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>			
<ul style="list-style-type: none"> <li>- Creation of illegal renegade trails on Green Ridge State Forest and Savage River State Forest that result in significant resource damage including increased sedimentation to important native brook trout habitat on Poplar Lick stream.</li> <li>- Poplar Lick: HCVF. Closed ORV trail with unmitigated crossing of last intact quality native brook trout stream. Description of tagging studies to monitor management, turbidity below crossings, 80% of this tributary is state-owned. No forest management is planned in this watershed</li> <li>- East Valley ORV Road at Mertens Avenue: severe erosion with sedimentation into stream, rutting of minor wetlands, soil disturbance off road in wetlands, blocked culvert which has resulted in recent movement of</li> </ul>			

<p>surface into the stream. Green Ridge State Forest ORV trail at campsite: Signed trail closure. Excessive rutting and drainage issues on signed ORV trail. Renegade trails present even though signed for no ORVs.</p>	
<p><b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i></p> <p>DNR must implement actions designed to curtail unauthorized activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.</p>	
<p><b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b></p> <p><i>(Response to Observations is optional)</i> <span style="float: right;"><i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/></span></p>	
<p><b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>See attachment: <b>SF_ForestRoadsManagementPlan_v1-4.doc</b></p> <p>See URLs:</p> <p>DNR Closes Three Off-Road Vehicle Trails: Agency Creates ORV Stakeholder Work Group  <a href="http://dnr.maryland.gov/dnrnews/pressrelease2011/050611b.asp">http://dnr.maryland.gov/dnrnews/pressrelease2011/050611b.asp</a></p> <p>DNR Announces Results Of Off-Road Vehicle Trail Studies  <a href="http://www.dnr.maryland.gov/dnrnews/pressrelease2011/032211.asp">http://www.dnr.maryland.gov/dnrnews/pressrelease2011/032211.asp</a></p> <p>DNR Announces Interim Results Of Recent Off-Road Vehicle Trails Meeting  <a href="http://www.dnr.maryland.gov/dnrnews/pressrelease2011/033011.asp">http://www.dnr.maryland.gov/dnrnews/pressrelease2011/033011.asp</a></p>	
<p>Company Representative Name and Title (no signature necessary)</p> <p>Jack Perdue</p>	<p>Date</p> <p>September 2011</p>

<b>SCS to complete this section upon review of submitted evidence</b>	
<p><b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b>  <i>(Describe conclusion in detail)</i></p> <p>Maryland DNR Forest Service (MFS) permanently closed the problematic and unsustainable ORV trails in Western Maryland and the Eastern Shore following the April 2011 audit. Evidence in the form of URLs and a revised Forest Roads Management Plan provide evidence of this corrective action.</p> <p><input checked="" type="checkbox"/> <b>CLOSED</b>  <input type="checkbox"/> <b>UPGRADED</b> (see CAR/OBS form for subsequent audit)  <input type="checkbox"/> <b>OTHER DECISION</b> (refer to description above)</p>	
<p>SCS Representative Name and Title (CAR/OBS reviewer)                      Brendan Grady, SCS</p>	<p>Date of Acceptance of Corrective Action                      September 2011</p>
<p><i>Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS</i></p>	

		<b>CAR/OBS Number:</b>	<b>2.</b>
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input checked="" type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>			
<b>Site CAR/OBS issued to</b> (where more than one site)		West and East Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/>	— 3 months from date report finalized		
<input checked="" type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to (re)certification		
<input type="checkbox"/>	Other deadline (specify):		
<input type="checkbox"/>	N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: 4.5.b	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>			
<p>The DNR has not provided a known and accessible means for interested stakeholders to voice grievances and have them resolved. DNR Forestry does not have a procedure for its staff to follow when attempting to resolve grievances. ISO (FSC-STD-20-001 V3, 22) requires a formal means for stakeholders to voice grievances and have them resolved. Such a procedure shall ensure that the certificate holders</p> <ul style="list-style-type: none"> <li>• keep a record of all complaints made known to them relating to compliance with FSC requirements (see also indicator 8.2.d.4);</li> <li>• make these records available to SCS upon request;</li> <li>• take appropriate action with respect to such complaints and any deficiencies found in forest management that affect compliance with the requirements for certification; and</li> <li>• document the actions taken.</li> </ul>			
OTHER APPLICABLE STANDARD REFERENCES: FSC-STD-20-001 V3-0, 22			
<b>EVIDENCE OF NONCONFORMITY:</b> (N/A for Observations)			
<ul style="list-style-type: none"> <li>- Review of DNR Website</li> <li>- Interviews with forest managers and staff</li> </ul>			
<b>REQUESTED CORRECTIVE ACTION:</b> (N/A for Observations)			
<p>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</p> <ul style="list-style-type: none"> <li>• Keep a record of all complaints made known to them relating to compliance with FSC requirements (see also indicator 8.2.d.4);</li> <li>• Make these records available to SCS upon request;</li> <li>• Take appropriate action with respect to such complaints and any deficiencies found in forest management that affect compliance with the requirements for certification; and</li> <li>• Document the actions taken.</li> </ul> <p>Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.</p>			

<p><b>Client to complete this section of the form electronically and return by email with evidence attached</b>  <i>(Response to Observations is optional)</i> <span style="float: right;">No response necessary - <b>CLOSED</b> by auditor: <input type="checkbox"/></span></p>	
<p><b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b>                  A State Forest Management Grievance Policy has been created and implemented that addresses these issues.                  See attachment: <b>MD_SFM_Grievance_Policy_v1-o.doc</b></p>	
<p>Company Representative Name and Title (no signature necessary)                  Jack Perdue</p>	<p>Date                  September 2011</p>
<p><b>SCS to complete this section upon review of submitted evidence</b></p>	
<p><b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b>  <i>(Describe conclusion in detail)</i>                  This State Forest Management Grievance Policy has been created and implemented and addresses each of the requirements of this section of the Standard. MD_SFM_Grievance_Policy_v1-0.doc has been submitted to SCS as evidence in association with this report.</p> <p><input checked="" type="checkbox"/> <b>CLOSED</b>  <input type="checkbox"/> <b>UPGRADED</b> (see CAR/OBS form for subsequent audit)  <input type="checkbox"/> <b>OTHER DECISION</b> (refer to description above)</p>	
<p>SCS Representative Name and Title (CAR/OBS reviewer)                  Anne Marie Kittredge, Lead Auditor</p>	<p>Date of Acceptance of Corrective Action                  May 21, 2012</p>
<p><i>Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS</i></p>	

		<b>CAR/OBS Number:</b>	<b>3.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 5.3.b	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  Audit team observed occurrences where harvest practices were not effectively managed to minimize soil compaction, rutting, and erosion.			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>  The following sites had compaction and rutting that were not minimized: <ul style="list-style-type: none"> <li>- Savage River State Forest- Amish Road Thinning: Rutting in seep area</li> <li>- Green Ridge State Forest- Oldtown Orleans Road Harvest: Active 35-acre variable retention regeneration harvest. Retention trees painted. Skid road excessively rutted; spur road contained rutting in one location. Unusually high recent rainfall.</li> </ul>			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i> DNR must implement measures to ensure that harvest practices are effectively managed to minimize soil compaction, rutting and erosion. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			
<b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b> <i>(Response to Observations is optional)</i> <span style="float: right;"><i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/></span>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> A Rutting Policy and Roads Maintenance Policy have been drafted and have been put into implementation. See attachments: <b>Rutting Guidelines FINAL DRAFT 12-07-11.doc</b>			
Company Representative Name and Title (no signature necessary) Jack Perdue		Date December 2011	
<b><i>SCS to complete this section upon review of submitted evidence</i></b>			
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i> A rutting policy ( <i>Rutting Guidelines For Forest Operations on Maryland State Forests</i> ) has been drafted and implemented. Observations at each of the 2012 audit sites (GR-03-11; GR-04-12; GR-05-10 and GR-03-12; WR18; W45; WR6; WR12; WR14; WR18; W45; S14) & confirm that implementation of this policy is complete.			

<input checked="" type="checkbox"/> CLOSED	
<input type="checkbox"/> UPGRADED (see CAR/OBS form for subsequent audit)	
<input type="checkbox"/> OTHER DECISION (refer to description above)	
SCS Representative Name and Title (CAR/OBS reviewer) Anne Marie Kittredge, Lead Auditor	Date of Acceptance of Corrective Action May 21, 2012
<i>Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS</i>	

		<b>CAR/OBS Number:</b>	<b>4.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/>	— 3 months from date report finalized		
<input checked="" type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to (re)certification		
<input type="checkbox"/>	Other deadline (specify):		
<input type="checkbox"/>	N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: 6.5.d	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>			
<p>The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is not 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>** Given that it is physically and economically unrealistic to redesign and fully reconstruct a legacy road system, the focus of this corrective action is on maintenance and limited reconstruction where possible.</p>			
OTHER APPLICABLE STANDARD REFERENCES: Guidance for Indicator 2.2.a			
<b>EVIDENCE OF NONCONFORMITY:</b> (N/A for Observations)			
<p>The following sites had significant road/trail construction and or maintenance problems:</p> <ul style="list-style-type: none"> <li>- Potomac Garret State Forest: Burkholder Road ATV Trail: issues with drainage provisions, not graded regularly in many years, although some sections have had work done to stabilize; running dips have been worn down, some erosion of surface</li> <li>- Savage River State Forest: Poplar Lick: HCVF. Closed ORV trail with unmitigated crossing of last intact quality native brook trout stream.</li> <li>- Green Ridge State: Oldtown Orleans Road ORV trail at campsite. Excessive rutting and drainage issues on signed ORV trail.</li> </ul> <p>Given that it is physically and economically unrealistic to redesign and fully reconstruct a legacy road system, the focus of this corrective action is on maintenance and limited reconstruction where possible.</p>			
<b>REQUESTED CORRECTIVE ACTION:</b> (N/A for Observations)			



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) Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.

**Client to complete this section of the form electronically and return by email with evidence attached**

*(Response to Observations is optional)*

No response necessary - **CLOSED** by auditor:

**DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:**

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**

Company Representative Name and Title (no signature necessary)

Jack Perdue

Date

December 2011

**SCS to complete this section upon review of submitted evidence**

**SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION**

*(Describe conclusion in detail)*

The Roads Maintenance Policy has been drafted, adopted and implemented. Observations at each of the 2012 audit sites include for example closed ORV trails (Poplar Lick) and the Gleason Hill Road inventory/redesign/construction project confirms the implementation of the policy. A bill was introduced in the current session of the Maryland Legislature that will add over \$1 million into State Forest roads maintenance. Notes from interviews during opening meeting: Permit applications for stream crossing design and improvements are in process. DNR closed ORV trails. DNR is currently evaluating where to site future ORV trails. Road inventory 50% complete. Anticipated completion fall 2012.

**CLOSED**

**UPGRADED** (see CAR/OBS form for subsequent audit)

**OTHER DECISION** (refer to description above)

SCS Representative Name and Title (CAR/OBS reviewer)

Anne Marie Kittredge, Lead Auditor

Date of Acceptance of Corrective Action

May 21, 2012

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*

		<b>CAR/OBS Number:</b>	<b>5.</b>
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input checked="" type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 5.6.d	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  DNR has not utilized available information, and new information that can be reasonably gathered, to set harvesting levels for NTFP's (e.g., ginseng) that will not result in a depletion of its growing stocks or other adverse effects to the forest ecosystem. The DNR does not monitor harvest levels or ginseng stocks in the forest. OTHER APPLICABLE STANDARD REFERENCES:			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i> <ul style="list-style-type: none"> <li>- Interviews with DNR staff and stakeholders</li> <li>- Review of DNR planning documents</li> </ul>			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i> 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. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			

<b>Client to complete this section of the form electronically and return by email with evidence attached</b> (Response to Observations is optional) <span style="float: right;">No response necessary - <b>CLOSED</b> by auditor: <input type="checkbox"/></span>	
<p><b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Also, the western Maryland State Forests are conducting a five-year forest inventory which includes the presence of ginseng on the inventory plots.</p>	
Company Representative Name and Title (no signature necessary) Jack Perdue	Date April 12, 2012

**SCS to complete this section upon review of submitted evidence**

**SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION**

*(Describe conclusion in detail)*

A final decision on the status of this CAR will be made at a later date following review by DNR and analysis of the historical ginseng harvest levels.

One change was instituted during this audit cycle. In order for harvesters to collect on a State Forest, each collector must check-in at the State Forest. This information will give MD DNR a better handle on how much collecting occurs on State Forests. MD DNR intends to continue to monitor permit numbers. During this past 2011 harvest season MD DNR issued the following permits: Green Ridge = 3 permits; Savage River = 28 permits; Potomac-Garrett = 8 permits.

MD DNR will discuss with other groups and will soon set a harvest level.

Due to the natural history and distribution of P. quinquefolius, inventory plots may not adequately document presence or absence.

CAR upgraded to Major CAR 2012.2

- CLOSED
- UPGRADED (see CAR/OBS form for subsequent audit)
- OTHER DECISION

SCS Representative Name and Title (CAR/OBS reviewer)  
Anne Marie Kittredge, Lead Auditor

Date of Acceptance of Corrective Action  
May 21, 2012

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*

		<b>CAR/OBS Number:</b>	<b>6.</b>
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input checked="" type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/> — 3 months from date report finalized <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 6.1.b	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  Prior to commencing site-disturbing activities, DNR does not 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. OTHER APPLICABLE STANDARD REFERENCES:			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i> -Interviews with DNR staff -Review of work plans 2009-2011 Savage River State Forest - Interview with Forest Advisory Committee members - Potential impacts are assessed through the ID team process; however, the Annual Work Plan only provides a very brief summary of the proposed silviculture and no assessment of impacts. As a result the ID Team, Forest Advisory Committee, and public are all limited in their ability to assess the concerns and mitigation efforts of the proposed action. - The audit team observed 2 instances where Heritage staff reported that the details of completed harvests did not match their understanding of the projects based on the ID review. - The audit team also learned of other instances where the forestry staff did not fully understand which non-timber resources Heritage wanted to manage for. - Brief silvicultural description combined with the lack of documentation related to potential outcomes and impacts contributed to these misunderstandings.			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i>  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. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			

<b>Client to complete this section of the form electronically and return by email with evidence attached</b> (Response to Observations is optional) <span style="float: right;">No response necessary - <b>CLOSED</b> by auditor: <input type="checkbox"/></span>	
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> 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.	
Company Representative Name and Title (no signature necessary) Jack Perdue	Date April 12, 2012
<b>SCS to complete this section upon review of submitted evidence</b>	
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> (Describe conclusion in detail)	
Review of the current State Forest annual work plan confirms that this plan addresses the (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.  In addition, review of the most recently revised Timber Operations Order confirms that this document also includes these same required elements.  Document review, interviews and observations at each of the 2012 audit sites (GR-03-11; GR-04-12; GR-05-10 and GR-03-12; WR18; W45; WR6; WR12; WR14; WR18; W45; S14) confirm that implementation of the Timber Operations Order and the current State Forest Annual Work Plan is complete.	
<input checked="" type="checkbox"/> <b>CLOSED</b> <input type="checkbox"/> <b>UPGRADED</b> (see CAR/OBS form for subsequent audit) <input type="checkbox"/> <b>OTHER DECISION</b> (refer to description above)	
SCS Representative Name and Title (CAR/OBS reviewer) Anne Marie Kittredge, Lead Auditor	Date of Acceptance of Corrective Action May 21, 2012
Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS	

		<b>CAR/OBS Number:</b>	<b>7.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 6.1.d	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b> <p>On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available. However, Chapter 5 of the SFMP has not yet undergone a public review process.</p> <p>OTHER APPLICABLE STANDARD REFERENCES:</p>			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i> <p>Interviews with DNR staff.</p>			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i> <p>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. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.</p>			
<p><b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b>  <i>(Response to Observations is optional)</i> <span style="float: right;"><i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/></span></p>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> <p>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. <b>See URL:</b> <a href="http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp">http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp</a></p>			
Company Representative Name and Title (no signature necessary) Jack Perdue		Date April 12, 2012	
<p><b><i>SCS to complete this section upon review of submitted evidence</i></b></p>			
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i> <p>Each State Forest Management Plan and the recent Annual Work Plan was posted for review and comment on the agency website. Document and link review confirms that each forest management plan was made available as required by the Standard.</p> <input checked="" type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED (see CAR/OBS form for subsequent audit) <input type="checkbox"/> OTHER DECISION (refer to description above)			
SCS Representative Name and Title (CAR/OBS reviewer) Anne Marie Kittredge, Lead Auditor		Date of Acceptance of Corrective Action May 21, 2012	

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*



		<b>CAR/OBS Number:</b>	<b>8.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/>	— 3 months from date report finalized		
<input checked="" type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to (re)certification		
<input type="checkbox"/>	Other deadline (specify):		
<input type="checkbox"/>	N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: 6.3.f	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  Audit team observed instances of timber harvest management that did not maintain, enhance, or restore habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. Including: <ul style="list-style-type: none"> <li>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</li> <li>b) vertical and horizontal complexity.</li> </ul>			
<small>OTHER APPLICABLE STANDARD REFERENCES:</small>			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i> Savage River State Forest: Bowman Hill Regeneration Harvest: Variable retention regeneration resulted in clearcut with no retention. Retention in feathered edge and outside of harvest boundary; Fairview Road Regeneration Coarse woody debris mostly absent due to high levels of utilization; Jenkins Hill Salvage.			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i> 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: <ul style="list-style-type: none"> <li>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</li> <li>b) vertical and horizontal complexity.</li> </ul> Trees selected for <b>retention</b> are generally representative of the dominant species found on the site. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			

<b>Client to complete this section of the form electronically and return by email with evidence attached</b> (Response to Observations is optional) <span style="float: right;">No response necessary - <b>CLOSED</b> by auditor: <input type="checkbox"/></span>	
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> The <u>Forest Stand Retention For Forest Operations on Maryland State Forests</u> 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: <b>FC_RetentionPolicy_ver4.doc &amp; MD_ForestHarvest_Review_Checklist_v1-5_field.doc</b>	
Company Representative Name and Title (no signature necessary) Jack Perdue	Date April 12, 2012
<b>SCS to complete this section upon review of submitted evidence</b>	
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> (Describe conclusion in detail)  Observations at each of the 2012 audit sites (GR-03-11; GR-04-12; GR-05-10 and GR-03-12; WR18; W45; WR6; WR12; WR14; WR18; W45; S14) and staff interviews confirm that implementation of the <i>Forest Stand Retention For Forest Operations on Maryland State Forests</i> and an Internal Silvicultural Audit system have been implemented. Both were reviewed as evidence of this corrective action in association with this report.  Retention potential was discussed during staff interviews and specifically evaluated by the auditor team and considered to be an improvement over past practices at the 2012 audit sites listed above.  <input checked="" type="checkbox"/> <b>CLOSED</b> <input type="checkbox"/> <b>UPGRADED</b> (see CAR/OBS form for subsequent audit) <input type="checkbox"/> <b>OTHER DECISION</b> (refer to description above)	
SCS Representative Name and Title (CAR/OBS reviewer) Anne Marie Kittredge, Lead Auditor	Date of Acceptance of Corrective Action May 21, 2012
<i>Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS</i>	

		<b>CAR/OBS Number:</b>	<b>9.</b>
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input checked="" type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 6.3.h	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  DNR has not assessed the risk of, prioritized, and, as warranted, developed and implemented a strategy to prevent or control <b>invasive species</b> , including: <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> <li>2. Implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</li> <li>3. Eradication or control of established invasive populations when feasible: and,</li> <li>4. Monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</li> </ol>			
OTHER APPLICABLE STANDARD REFERENCES:			
<b>EVIDENCE OF NONCONFORMITY:</b> (N/A for Observations) <ul style="list-style-type: none"> <li>- Although a systematic forest-wide inventory of invasive species has begun through the SILVAH inventory process, DNR does not yet have an invasive species program that determines the extent and prioritizes the degree of threat.</li> <li>- Actions such as pressure washing equipment, removing invasives before final harvest are not being routinely practiced.</li> <li>- Monitoring of the effectiveness of control measures is informal and not well documented.</li> <li>- Management plan does not adequately cover invasive - Savage River State Forest SFMP 3/28/2011</li> </ul>			
<b>REQUESTED CORRECTIVE ACTION:</b> (N/A for Observations) <p>DNR must assess the risk of, prioritize, and, as warranted, develop and implement 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> <li>2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</li> <li>3. eradication or control of established invasive populations when feasible: and,</li> <li>4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</li> </ol> <p>Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.</p>			

<b>Client to complete this section of the form electronically and return by email with evidence attached</b> <i>(Response to Observations is optional)</i> <span style="float: right;"><i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/></span>	
DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:	
Company Representative Name and Title (no signature necessary)	Date

**SCS to complete this section upon review of submitted evidence**

**SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION**

*(Describe conclusion in detail)*

MD DNR recently implemented a state-wide Early Detection & Rapid Response Plan which includes the following excerpt: "This plan is designed to provide timely identification and effective treatment of small (<1/4 Acre) outbreaks of invasive species on State Lands. The intent is to take a proactive approach for the protection of native community types in the forest". MD DNR is in the middle of its 5-year forest inventory project and the presence of invasive plants is 1 of the features included in the forest inventory (SILVAH Oak); invasive plants are also noted and monitored during routine project planning and post-harvest reports. In addition special invasive treatment projects are documented in Annual Work Plans. In addition, the 2011 MD legislature authorized the establishment of an Invasive Plant Advisory committee that develops and ranks invasive plants. Finally, MD DNR developed 2 research projects in cooperation with the MD Wildlife and Heritage Service. The first project included GRSF and determined how often common invasive species occurred, describes regional patterns and concluded that levels of invasion are not as severe as documented levels in other parts of the state. The second project focuses on the presence of invasive plants in ESAs and has selected a section of CSF as a study site.

MD DNR is working with their Natural Heritage Program to develop exotic/invasive plant species Best Management Practices guidelines. In addition, research discussions with harvest operators regarding the effective and efficient use of power washing equipment before harvest machinery enters a State Forest harvest area has been initiated and has not met with resistance. The details of this practice are still being developed. MD DNR is reviewing 2 management practice programs that were developed elsewhere (NY TNC & WI) with consideration of adapting the practices to the MD DNR system.

For example, a recent April 2011 treatment and projected October 2012 follow-up of Garlic Mustard Control Project - Wallman/Laurel Run, Potomac Garrett State Forest included ground spraying in designated areas within 6 compartments, follow-up monitoring and re-treatment. In another 2012 example on the SRSF, MD DNR staff demonstrated its ability to implement an early detection and rapid response in an impressive efforts to treat and prevent the spread of the newly discovered yellow archangel (*Lamium galeobdolon*). This example confirms a high level of coordination among field id teams, a proactive approach to invasive plant species control and an exceptional ability to quickly treat the area.

The MD DNR Natural Heritage Program is responsible for most of the monitoring of control measures and the State Forests represent the major locations for their suppression projects. MD DNR is currently reviewing a management practice program that was developed by NY TNC and is considering adapting the practice to the MD DNR system. Once the protocol for MD DNR is completed, it will include the required element of monitoring. In addition, MD DNR is in the middle of its 5-year forest inventory project and the presence of invasive plants is 1 of the features included in the forest inventory (SILVAH Oak); invasive plants are also noted and monitored during routine project planning and post-harvest reports. And finally, for example, a recent April 2011 treatment and projected October 2012 follow-up of Garlic Mustard Control Project - Wallman/Laurel Run, Potomac Garrett State Forest included ground spraying in designated areas within 6 compartments, follow-up monitoring and re-treatment.

- CLOSED
- UPGRADED (see CAR/OBS form for subsequent audit)
- OTHER DECISION (refer to description above)

SCS Representative Name and Title (CAR/OBS reviewer) Anne Marie Kittredge, Lead Auditor	Date of Acceptance of Corrective Action May 21, 2012
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*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*

		<b>CAR/OBS Number: 10.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation		
<b>Site CAR/OBS issued to</b> (where more than one site)		East and West Regions
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: 6.4.a
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  DNR has documented the ecosystems that would naturally exist on the FMU; however, DNR has not assessed the adequacy of the representation of ecosystems and protection in the <b>landscape</b> (see Criterion 7.1). OTHER APPLICABLE STANDARD REFERENCES:		
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>  Review of RSA Map and discussion with forestry staff. One RSA of each forest type was established on each state forest, but this was done without first assessing whether and what gaps of RSA there are on the landscape.		
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i>  DNR must document the ecosystems that would naturally exist on the FMU, and assess the adequacy of their representation and protection in the <b>landscape</b> . Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.		
<b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b> <i>(Response to Observations is optional)</i> <span style="float: right;"><i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/></span>		
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> The <u>Methodology for Locating Representative Sample Areas (RSA) for Naturally Occurring Ecosystems within the Region of Maryland State Forests</u> 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. See attachment: <b>RSA_Analysis_Methodology_v1-o.doc</b>		
Company Representative Name and Title (no signature necessary) Jack Perdue		Date April 12, 2012
<b><i>SCS to complete this section upon review of submitted evidence</i></b>		
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i>  As confirmed through review of “ <i>Methodology for Locating Representative Sample Areas (RSA) for Naturally Occurring Ecosystems within the Region of Maryland State Forests</i> ”, the methodology has been developed in cooperation with the MD DNR Natural Heritage Program. This GAP analysis is based on the spatial analysis of the surrounding regions and determines regional ecosystems and necessary RSA designations on the FMU or other nearby protected lands that may represent those ecosystems.  Final ecosystem data is complete as confirmed through interviews and data review. MD DNR met with Natural Heritage and identified the presence/absence/adequacy of types in surrounding landscape as well as within State		

Forests.

- CLOSED
- UPGRADED (see CAR/OBS form for subsequent audit)
- OTHER DECISION (refer to description above)

SCS Representative Name and Title (CAR/OBS reviewer)

Anne Marie Kittredge, Lead Auditor

Date of Acceptance of Corrective Action

May 21, 2012

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*

		<b>CAR/OBS Number:</b>	<b>11.</b>
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input checked="" type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/>	— 3 months from date report finalized		
<input checked="" type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to (re)certification		
<input type="checkbox"/>	Other deadline (specify):		
<input type="checkbox"/>	N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: 7.1.b	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>			
<p>The SFMP's for Potomac Garret, Savage River and Green Ridge State Forests are not in conformance with the following requirements for management plans:</p> <ul style="list-style-type: none"> <li>- The management plan describes the natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</li> <li>- 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).</li> <li>- If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.</li> <li>- Management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</li> <li>- Management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.</li> <li>- Description of invasive species conditions, applicable management objectives, and how they will be controlled.</li> </ul> <p>Additionally- The SFMP's for Potomac/Garret, Savage River, and Green Ridge State Forests could improve upon the treatment of historical ecological conditions.</p>			
OTHER APPLICABLE STANDARD REFERENCES:			
EVIDENCE OF NONCONFORMITY: <i>(N/A for Observations)</i>			
Review of the SFMP's for Potomac Garret, Savage River and Green Ridge State Forests			
REQUESTED CORRECTIVE ACTION: <i>(N/A for Observations)</i>			
DNR must ensure that management plans			
<ul style="list-style-type: none"> <li>- Describe the natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</li> <li>- 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).</li> <li>- Describe biological control agents being used, applications, and how the management system conforms with Criterion 6.8.</li> <li>- Describe the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</li> <li>- Describe and justify the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.</li> <li>- Describe invasive species conditions, applicable management objectives, and how they will be controlled.</li> </ul>			



Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.

**Client to complete this section of the form electronically and return by email with evidence attached**

*(Response to Observations is optional)*

No response necessary - **CLOSED by auditor:**

**DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:**

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)

Company Representative Name and Title (no signature necessary)

Jack Perdue

Date

April 12, 2012

**SCS to complete this section upon review of submitted evidence**

**SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION**

*(Describe conclusion in detail)*

The forest management plans for this western region include each of the required elements as confirmed through document review.

**CLOSED**

**UPGRADED** (see CAR/OBS form for subsequent audit)

**OTHER DECISION** (refer to description above)

SCS Representative Name and Title (CAR/OBS reviewer)

Anne Marie Kittredge, Lead Auditor

Date of Acceptance of Corrective Action

May 21, 2012

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*

		<b>CAR/OBS Number:</b>	<b>12.</b>
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input checked="" type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/>	— 3 months from date report finalized		
<input checked="" type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to (re)certification		
<input type="checkbox"/>	Other deadline (specify):		
<input type="checkbox"/>	N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: 8.2.d.1	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  In some instances monitoring has not been 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. OTHER APPLICABLE STANDARD REFERENCES:			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>  <ul style="list-style-type: none"> <li>- Amish Road Thinning: 72-year old mixed oak stand. Thinning from below. Retained oak overstory. Conservative removal based on an old work plan. No stump spots. Some Hemlock removed. Ruts in seep area.</li> <li>- Bowman Hill Regeneration Harvest- no stump marking.</li> <li>- Oldtown Orleans Road Harvest: 65-acre 95-year old oak/hard pine stand. Active 35-acre variable retention regeneration harvest. Retention trees painted. Skid road excessively rutted; spur road contained rutting in one location.</li> </ul>			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i> 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. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			
<b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b> <i>(Response to Observations is optional)</i>			
No response necessary - <b>CLOSED by auditor:</b> <input type="checkbox"/>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> 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: <b>MD_ForestHarvest_Review_Checklist_v1-5_field.doc &amp; MD_ISA_2012_EXAMPLES.pdf</b>			
Company Representative Name and Title (no signature necessary) Jack Perdue		Date April 12, 2012	

**SCS to complete this section upon review of submitted evidence**

**SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION**

*(Describe conclusion in detail)*

The Internal Silvicultural Audits (ISA) procedure was recently established and implemented to address the environmental impact of silvicultural operations on State Forests; this ISA process is completed by the ID Team during the normal annual work plan reviews. The 2012 ISA review was implemented by a team that included the Regional Forester, Forest Manager & staff, Forest Resource Planning Program Manager.

The procedure and ISA checklists for 2012 sites were reviewed by the auditors in relation to the following sites: GR-03-11; GR-04-12; GR-05-10 and GR-03-12.

- CLOSED
- UPGRADED (see CAR/OBS form for subsequent audit)
- OTHER DECISION (refer to description above)

SCS Representative Name and Title (CAR/OBS reviewer)  
Anne Marie Kittredge, Lead Auditor

Date of Acceptance of Corrective Action  
May 21, 2012

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*

		<b>CAR/OBS Number:</b>	<b>13.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 8.2.d.2	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  DNR does not have a monitoring program in place to assess the condition and environmental impacts of the forest-road system. Although roads and skid trails are monitored during timber sales, there is no periodic monitoring of the environmental impacts of the network of roads and skid trails on the state forests. OTHER APPLICABLE STANDARD REFERENCES:			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>  Interviews with DNR staff and review of the SFMP's for Potomac Garret, Savage River and Green Ridge State Forests .			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i>  DNR must implement a monitoring program to assess the condition and environmental impacts of the forest-road system. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			
<b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b> <i>(Response to Observations is optional)</i>			
<i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> 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: <b>SF_ForestRoadsManagementPlan_v1-4.doc</b>			
Company Representative Name and Title (no signature necessary) Jack Perdue		Date April 12, 2012	

**SCS to complete this section upon review of submitted evidence**

**SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION**

*(Describe conclusion in detail)*

A Forest Roads Management For Forest Operations on Maryland State Forests has been developed, adopted and implemented. This policy creates 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 allows the development of a priority plan for road maintenance and feature replacement that is incorporated into annual work plans for each state forest.

A bill was introduced in the current session of the Maryland Legislature that may put over \$1 million into State Forest roads maintenance projects; some of which has already been granted to MD DNR. The road inventory portion of this process has been initiated as confirmed during the site visit to Gleason Hill Road, SRSF. MD DNR also instituted an internal monitoring system to examine the environmental and management impacts of silvicultural activities. This monitoring system has recently been expanded to include a post-harvest review by the ID team as described elsewhere in this report.

- CLOSED
- UPGRADED (see CAR/OBS form for subsequent audit)
- OTHER DECISION (refer to description above) Continue until next surveillance audit.

SCS Representative Name and Title (CAR/OBS reviewer)

Anne Marie Kittredge, Lead Auditor

Date of Acceptance of Corrective Action

May 21, 2012

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*

		<b>CAR/OBS Number:</b>	<b>14.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/> — 3 months from date report finalized <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 9.2.b	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  A transparent and accessible public review of proposed HCV attributes and HCVF areas and management has not been carried out. Information from public review has not been integrated into HCVF descriptions, delineations and management. <b>OTHER APPLICABLE STANDARD REFERENCES:</b>			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>  Interviews with DNR staff indicate that as of May 1, 2011- HCVF designations, which are part of the SFMP, have not undergone a public review.			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i>  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. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			
<b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b> <i>(Response to Observations is optional)</i>			
<i>No response necessary - <b>CLOSED by auditor:</b></i> <input type="checkbox"/>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> 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. <b>See URL:</b> <a href="http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp">http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp</a>			
<b>Company Representative Name and Title</b> (no signature necessary) Jack Perdue		<b>Date</b> April 12, 2012	

<b>SCS to complete this section upon review of submitted evidence</b>	
<p><b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b>  <i>(Describe conclusion in detail)</i></p> <p>The forest management plans (including HCVFs) for this western region are complete and accessible to the public as confirmed through review of the documents and link:  <a href="http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp">http://www.dnr.state.md.us/forests/sfmp_wmd/index.asp</a>.</p> <p><input checked="" type="checkbox"/> CLOSED  <input type="checkbox"/> UPGRADED (see CAR/OBS form for subsequent audit)  <input type="checkbox"/> OTHER DECISION (refer to description above)</p>	
<p>SCS Representative Name and Title (CAR/OBS reviewer)                      Anne Marie Kittredge, Lead Auditor</p>	<p>Date of Acceptance of Corrective Action                      May 21, 2012</p>
<p><i>Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS</i></p>	

		<b>CAR/OBS Number:</b>	<b>15.</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>Site CAR/OBS issued to</b> (where more than one site)		West and East Regions	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/> — 3 months from date report finalized <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input checked="" type="checkbox"/> Other deadline (specify): <input type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 8.3.a	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  MD DNR lacks 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. <b>OTHER APPLICABLE STANDARD REFERENCES:</b>			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>  MD DNR maintains a COC system for the Eastern lands, however, load tickets must be traceable to a proper invoice (e.g., timber sale contract) that includes an FSC Claim ("FSC 100%") and the correct COC number.			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i>  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. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			
<b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b> <i>(Response to Observations is optional)</i> <span style="float: right;"><i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/></span>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> Maryland DNR Forest Service established a chain of custody policy through the <b>Chain-of-Custody Documented Control System</b> . See attachment: <b>MD-DNR_FSC_CoC_Procedures_v3.doc</b>			
Company Representative Name and Title (no signature necessary) Jack Perdue		Date September 2011	
<b><i>SCS to complete this section upon review of submitted evidence</i></b>			
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i> Maryland DNR Forest Service established and implemented Chain-of-Custody Documented Control System (MD-DNR_FSC_CoC_Procedures_v3.doc). The policy has been submitted to SCS in association with this report.			
<input checked="" type="checkbox"/> <b>CLOSED</b> <input type="checkbox"/> <b>UPGRADED</b> (see CAR/OBS form for subsequent audit) <input type="checkbox"/> <b>OTHER DECISION</b> (refer to description above)			
SCS Representative Name and Title (CAR/OBS reviewer) Brendan Grady, SCS		Date of Acceptance of Corrective Action September 2011	
<i>Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS</i>			



		<b>CAR/OBS Number:</b>	<b>16.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/>	— 3 months from date report finalized		
<input type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to (re)certification		
<input type="checkbox"/>	Other deadline (specify):		
<input checked="" type="checkbox"/>	N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: 4.4a	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>			
<p>DNR does not adequately document social impact assessments and monitoring, and ensure that the following topics are covered:</p> <ul style="list-style-type: none"> <li>• Archeological sites and sites of cultural, historical and community significance (on and off the FMU);</li> <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>			
<b>OTHER APPLICABLE STANDARD REFERENCES:</b>			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>			
<p>Through the ID Team and Forest Advisory Committee processes the DNR has an effective protocol in place for monitoring and incorporating social impact assessment into management decisions. However based on DNR staff and ID team interviews, the process is not well documented and could be improved with more formal metrics of socio-economic impacts of management such as the number of jobs created as a result of timber harvests, or economic value of recreation opportunities.</p>			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i>			
<p>DNR should more adequately document social impact assessments and monitoring, and ensure that all relative topics are covered. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.</p>			

**Client to complete this section of the form electronically and return by email with evidence attached**  
 (Response to Observations is optional) No response necessary - **CLOSED** by auditor:

**DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:**

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**

Company Representative Name and Title (no signature necessary)  
 Jack Perdue

Date  
 April 12, 2012

**SCS to complete this section upon review of submitted evidence**

**SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION**

*(Describe conclusion in detail)*

The Annual Work Plan and ID Team processes are strong examples of planning efforts that allow for consideration of social impacts. Evidence of conformance includes:

- Forest Management Plans include descriptions of archeological sites and sites of cultural, historical and community significance.
- Forest Management Plans include descriptions of public resources, including air, water and food (hunting, fishing and collecting); the potential social impacts of hunting fishing and collecting were specifically considered and described during interviews.
- Forest Management Plans include a description of aesthetics. Planning for harvests includes consideration of aesthetics; field foresters are responsible and are supported by ID Teams. The use of the variable retention harvest prescription is 1 example of aesthetic considerations especially during the process of deciding on locations of clumped retention. Aesthetic considerations were specifically considered, described and incorporated for example on GRSF (GR-03-11 & GR-03-12). Confirmed through document review that the Policy & Procedure Manual includes for example the following section on visual quality: "In laying out forest harvest and thinning operations, particular care will be given to the need for visual quality protection. This will include location and operations of landings, decks, roads, and other areas of concentrated activity. Visual buffers will be maintained along areas where required." The field forester applies visual buffers as needed and the buffer is illustrated on the harvest plan maps. The 'Forestry Aesthetics Guide: Image and Opportunity' is the reference publication used by CSF & PSF staff.
- MD DNR's PR\_Procedures\_MFS and CAC\_purpose-statement.doc include community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health. In addition,

a 2009 multi-stakeholder partnership including the MD DNR engaged the public through the use of 5 listening sessions located across the state and culminating with the Forestry Summit. Key issues, strategies and recommendations for addressing these issues were developed. A key issue (Maintaining Viable Forests and a Viable Forest Industry in Maryland) included a strategy to inventory and manage State-owned forests as sustainable working forests.

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

- Community economic opportunities are addressed in a variety of ways including the use of timber harvest contracts that vary in size and scale; and the use of NTFP collection permits that are most often issued to local residents.
- Others who may be affected by management activities are incorporated into the process in the following ways: Maryland Historical Trust is a member of the Interdisciplinary Team that reviews each Annual Work Plan & project. Records of Annual Work Plan comments for each State Forest are solicited and considered.

The first draft of each management plan or Annual Work Plan is reviewed including field visits by DNR's internal interdisciplinary team members and each revision is reviewed by the Citizen's Advisory Committee. The revised plan is posted on the web for a 30-day review period and a public announcement is distributed to each major news outlet in the state, Patch.com and other relevant blog sites.

Other proposed activities including for example ROW issues with neighboring landowners, ad hoc salvage harvests, road realignments, acid mine mitigation, easement requests, adventure sporting events, insect studies and building razing are submitted to MD DNR for review and approval by DNR staff and the Maryland Historical Trust (if the proposal includes historic or archaeological topics).

A 2009 multi-stakeholder partnership including the MD DNR surveyed forestry leaders and other interested individuals and groups during 5 listening sessions state-wide and culminated with the Forestry Summit. Four key issues were identified. Strategies and recommendations for addressing these issues were developed.

MD DNR's protocol for monitoring and incorporating social impact assessment into management decisions is effective and is based on review by the ID Team and Forest Advisory Committee.

CLOSED

UPGRADED (see CAR/OBS form for subsequent audit)

OTHER DECISION (refer to description above) Continue until next annual audit.

SCS Representative Name and Title (CAR/OBS reviewer)	Date of Acceptance of Corrective Action
Anne Marie Kittredge, Lead Auditor	May 21, 2012

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*

		<b>CAR/OBS Number:</b>	<b>17.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input checked="" type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 4.4.d	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  DNR has not taken 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; OTHER APPLICABLE STANDARD REFERENCES:			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i> At least one stakeholder expressed a desire to have more advanced notice for public input opportunities. Since the State is not planning public meetings for the current SFMP revision it is of increased importance to ensure that the general public are well apprised of the management plan revision process and have ample time to review.			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i> 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. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			
<b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b> <i>(Response to Observations is optional)</i>			
<i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> 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.			
Company Representative Name and Title (no signature necessary) Jack Perdue		Date April 12, 2012	

<b>SCS to complete this section upon review of submitted evidence</b>	
<p><b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b>  <i>(Describe conclusion in detail)</i></p> <p>1) The Citizens Advisory Committee (CAC) for each of the State Forests receives and reviews each State Forest annual work plan and Sustainable Forest Management Plan (the 1st layer in the public notification).</p> <p>2) Each plan has been posted on the DNR website</p> <p>3) An associated 30-day review and comment period was announced to every major news outlet in Maryland including Patch.com and several blogs.</p> <p>4) Personal announcements were made directly to each CAC member by the Forest Manager.</p> <p>Each of these steps was confirmed through review of documents and announcements and interviews with CAC members and DNR staff.</p> <p><input checked="" type="checkbox"/> CLOSED</p> <p><input type="checkbox"/> UPGRADED (see CAR/OBS form for subsequent audit)</p> <p><input type="checkbox"/> OTHER DECISION (refer to description above)</p>	
<p>SCS Representative Name and Title (CAR/OBS reviewer)</p> <p>Anne Marie Kittredge, Lead Auditor</p>	<p>Date of Acceptance of Corrective Action</p> <p>May 21, 2012</p>
<p><i>Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS</i></p>	

		<b>CAR/OBS Number:</b>	<b>18.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input checked="" type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD:	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  The forest owner or manager and employees and contractors have not taken additional steps to ensure that they have the equipment and training necessary to respond to hazardous spills. OTHER APPLICABLE STANDARD REFERENCES:			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>  Timber sale contracts do not cover requirements for hazardous spill containment and clean up.			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i>  The forest owner or manager and employees and contractors should take additional steps to ensure that they have the equipment and training necessary to respond to hazardous spills. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			
<b><i>Client to complete this section of the form electronically and return by email with evidence attached</i></b> <i>(Response to Observations is optional)</i> <span style="float: right;"><i>No response necessary - CLOSED by auditor:</i> <input type="checkbox"/></span>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> 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.			
Company Representative Name and Title (no signature necessary) Jack Perdue		Date May 3, 2012	
<b><i>SCS to complete this section upon review of submitted evidence</i></b>			
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i>  Timber sale contracts have been revised to include this information as confirmed through the review of MD DNR's timber sale contract template. <input checked="" type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED (see CAR/OBS form for subsequent audit) <input type="checkbox"/> OTHER DECISION (refer to description above)			
SCS Representative Name and Title (CAR/OBS reviewer) Anne Marie Kittredge, Lead Auditor		Date of Acceptance of Corrective Action May 21, 2012	
<i>Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS</i>			

		<b>CAR/OBS Number:</b>	<b>19.</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b> <input type="checkbox"/> — 3 months from date report finalized <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to (re)certification <input type="checkbox"/> Other deadline (specify): <input checked="" type="checkbox"/> N/A — response is optional			
<b>Standard and Requirement Reference</b>		FSC US FM STD: 7.3.a	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b> <p>The FSC standard introduces some new topics and/or nuanced approaches such as methods for retaining stand level habitat elements. There is an opportunity to better train DNR staff and contractors on areas of the FSC standard where conformance gaps have been found and/or DNR has noted opportunities in their own ongoing assessment of conformance to the FSCS US Standard.</p> <p>OTHER APPLICABLE STANDARD REFERENCES:</p>			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i> <p>DNR staff interviews</p>			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i> <p>DNR should take additional steps to ensure that workers are qualified to properly implement the management plan, particularly the management plan revisions that are necessary for full conformance to the FSC US Standard. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.</p>			
<p><b>Client to complete this section of the form electronically and return by email with evidence attached</b>  <i>(Response to Observations is optional)</i> <span style="float: right;">No response necessary - <b>CLOSED</b> by auditor: <input type="checkbox"/></span></p>			
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> <p>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.</p> <p>Also since the 2011 audit, 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 of which the contractor should be aware.</p>			
Company Representative Name and Title (no signature necessary) Jack Perdue		Date April 12, 2012	

**SCS to complete this section upon review of submitted evidence**

**SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION**

*(Describe conclusion in detail)*

As confirmed through document review and MD DNR employee interviews, MD Forest Service state forest managers and other staff have met twice and focused 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 list of non-conformances.

A training session was designed and presented (February 2012) to the Western Maryland Master Logger program attendees and included relevant updates to the forest certification and policies (e.g. rutting, retention, chain-of-custody, roads maintenance). The training record indicates that 15 DNR employees participated in this training. Interviews with staff and operators and review of post-harvest conditions at the following sites (GR-03-11; GR-04-12; GR-05-10 and GR-03-12; WR18; W45; WR6; WR12; WR14; WR18; W45; S14) confirm that training was effective as indicated by the improved understanding of details of the FSC US standard including areas previously identified as gaps in conformance (including for example soil protections, structural retention for habitat protection and enhancement, invasive plant species identification and monitoring)

The Internal Silvicultural Audit process was developed and implemented since the previous audit program which resulted in the on-site visit and evaluation of 9 harvest sites state-wide.

As confirmed through DNR staff interviews, each of the state forests implemented a formal documented pre-harvest meeting with each harvest contractor allowing the forestry staff an additional opportunity to communicate the details of each harvest operation to each contractor.

- CLOSED
- UPGRADED (see CAR/OBS form for subsequent audit)
- OTHER DECISION (refer to description above)

SCS Representative Name and Title (CAR/OBS reviewer)  
Anne Marie Kittredge, Lead Auditor

Date of Acceptance of Corrective Action  
May 21, 2012

*Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS*



		<b>CAR/OBS Number:</b>	<b>20.</b>
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input checked="" type="checkbox"/> <b>Observation</b>			
<b>Site CAR/OBS issued to</b> (where more than one site)		West Region	
<b>Deadline for Corrective Action by Company</b>			
<input type="checkbox"/>	— 3 months from date report finalized		
<input type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to (re)certification		
<input type="checkbox"/>	Other deadline (specify):		
<input checked="" type="checkbox"/>	N/A — response is optional		
<b>Standard and Requirement Reference</b>		FSC US FM STD: 6.2.d	
<b>DESCRIPTION OF NONCONFORMITY OR OBSERVATION:</b>  DNR has not set harvesting levels, conservation zones and/or protection areas for NTFPs that will avoid a depletion of growing stock or result in other adverse effects to the forest ecosystem.  Ginseng is an S3 species and CITES listed species that is being actively harvested. Conservation zones or protected areas have not been established on MD State Forests.  OTHER APPLICABLE STANDARD REFERENCES:			
<b>EVIDENCE OF NONCONFORMITY:</b> <i>(N/A for Observations)</i>  <ul style="list-style-type: none"> <li>- Interviews with DNR staff and stakeholders</li> <li>- Review of DNR planning documents.</li> </ul>			
<b>REQUESTED CORRECTIVE ACTION:</b> <i>(N/A for Observations)</i>  DNR should set harvesting levels, conservation zones and/or protection areas for NTFPs that will avoid a depletion of growing stock or result in other adverse effects to the forest ecosystem. Evidence of corrective action and compliance with applicable requirements must be submitted by the deadline stated above.			

<b>Client to complete this section of the form electronically and return by email with evidence attached</b> (Response to Observations is optional) <span style="float: right;">No response necessary - <b>CLOSED</b> by auditor: <input type="checkbox"/></span>	
<b>DESCRIBE THE ACTION(S) TAKEN TO ADDRESS THE ROOT CAUSE OF THIS NONCONFORMITY:</b> 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.	
Company Representative Name and Title (no signature necessary) Jack Perdue	Date April 12, 2012
<b>SCS to complete this section upon review of submitted evidence</b>	
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> (Describe conclusion in detail)	
Observation upgraded and incorporated into 2012 CARs.	
<input type="checkbox"/> CLOSED <input checked="" type="checkbox"/> <b>UPGRADED</b> (see CAR/OBS form for subsequent audit) <input type="checkbox"/> <b>OTHER DECISION</b> (Status = open; Status to be reviewed during the 2012 audit program)	
SCS Representative Name and Title (CAR/OBS reviewer) Anne Marie Kittredge, Lead Auditor	Date of Acceptance of Corrective Action May 21, 2012
Press Enter once below table to leave a space, then copy and paste table below for each CAR/OBS	

<b>Certificate holder/applicant</b>	<b>State of Maryland Department of Natural Resources Forest Service</b>
CAR/OBS identified by (SCS representative)	Anne Marie Kittredge
Date of Issuance	May 21, 2012
Audit Year/Type (select from pull down menu)	3rd annual audit

TO BE COMPLETED BY SCS REPRESENTATIVE	<b>CAR/OBS Number</b> (e.g. 1, 2, ...)		<b>1</b>
	<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input checked="" type="checkbox"/> <b>Observation</b>		
	<b>FMU CAR/OBS issued to</b> (when more than one FMU)	Savage River State Forest	
	<b>Deadline for Corrective Action by FME</b>		
	<input type="checkbox"/> 3 months from above Date of Issuance <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> Other deadline (specify): n/a Observation only		
	<b>Standard and Requirement Reference</b>	FSC-US Forest Management Standard, Section 5.6.c	
<b>NON-CONFORMITY</b> <i>(or Background/ Justification in the case of Observations)</i> <i>(Describe and provide objective evidence)</i> Stands that have been depleted or rendered to be below productive potential due to natural events are not returned to desired composition at the earliest practicable time as justified in management objectives.  As a result of the high mortality and low residual live basal area, these salvaged stands are currently stocked at levels that are below productive potential due to natural events. There is an opportunity to improve MD DNRs salvage process for example by considering practices that combine some of the heavily damaged salvage operations (removal of dead and dying material) with a regeneration harvest (removal of some of the live red maple and black gum) for example as observed in SR-09-09 and SR-02-10 while considering DNR's retention guidelines in an attempt to more quickly move the damaged stands toward a more desirable species composition.  Evidence: SR-09-09 and SR-02-10. These stands were salvaged before these acres were certified.			
<b>REQUESTED CORRECTIVE ACTION</b> <i>(or Observation)</i> MD DNR should consider practices that combine some of the heavily damaged salvage operations (removal of dead and dying material) with a regeneration harvest (removal of some of the live red maple and black gum) while considering DNR's retention guidelines in an attempt to more quickly move the damaged stands toward a more desirable species composition and to improve MD DNR's compliance with this section of the Standard.			

<b>TO BE COMPLETED BY FME</b>	<b>IMPLEMENTED CORRECTIVE ACTION</b> <i>(Response to Observations is optional)</i> Describe action taken by the FME to address the root cause of the non-conformity	
	<b>EVIDENCE OF CONFORMANCE SUBMITTED WITH THIS FORM</b> <i>(please list)</i>	
	FME Representative Name and Title	Date
<b>TO BE COMPLETED BY SCS REPRESENTATIVE</b>	<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i>	
	<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED TO MAJOR <input type="checkbox"/> OTHER DECISION <i>(refer to description above)</i>	
	SCS Representative Name and Title (CAR/OBS reviewer)	Date of Acceptance of Corrective Action
Press Enter twice below table to leave a space, then copy and paste table below for each CAR/OBS		

TO BE COMPLETED BY SCS REPRESENTATIVE	<b>CAR/OBS Number</b> (e.g. 1, 2, ...) <span style="float: right;">2</span>	
	<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>Site CAR/OBS issued to</b> (where more than one site)	State Office – relates to state forests in the western region
	<b>Deadline for Corrective Action by FME</b>	
	<input checked="" type="checkbox"/> 3 months from above Date of Issuance <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> Other deadline (specify):	
	<b>Standard and Requirement Reference</b>	FSC-US Forest Management Standard, Section 5.6.d
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence)		
<p><b>Minor CAR 2011.5 has been upgraded to Major CAR 2012.2</b></p> <p>The forest owner or manager has not utilized available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p> <p>Evidence: Based on interviews with DNR staff, harvest levels have not yet been set.</p>		
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation)		
The forest owner or manager must utilize available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.		

TO BE

**IMPLEMENTED CORRECTIVE ACTION** (*Response to Observations is optional*)

Describe action taken by the FME to address the root cause of the non-conformity

Text response from FMU copied from email:

*I have read the two papers by Marla McIntosh and as you have pointed out, they do not attempt to document ginseng populations. There is a reference to NatureServe on the topic but it only states what has been said so many times already. During today's conversation with the MD State Botanist, he agrees, there simply is no good population data for our state.*

*Below is a reference to a conference held in 2003 on recommendations for a ginseng conservation policy (short of closing the harvest season).*

*There are three recommendations: 1) move back the harvest season, 2) deny harvesting of plants less than 5-years old, and 3) require planting of seeds near the source of the harvested plants.*

*The MD Dept of Ag permit and policy requires all three (see below).*

<http://www.mda.state.md.us/pdf/sang-col.pdf>

*An earlier communication from the MDA agent states that while some more analysis can be done (and is) it seems that the harvest levels over the past 30 years has been stable. Natural Heritage Program is working on this analysis, expected in June. Also, that some pressures from illegal early harvesting may be eliminated since Pennsylvania's ginseng season now coincides with that of WV and MD.*

*Today, I had a long conversation with the State Botanist on this issue. He agreed that without good scientific population data it is very unlikely that DNR would support a harvest limit or the concept to eliminate harvest in conservation zones. He couldn't even get the harvest moratorium past his unit director on Wildlife Management Areas. Even WV, would it suppose to have some of the best inventory data out there, the data is scant at best.*

*We have agreed to continue the process and the dialog (which would not have happened to degree it has without the CAR), but not sure where to take this from here.*

Implemented actions as of 10/16/12:

One change instituted during this audit cycle. In order for harvesters to collect on a State Forest, each collector must check-in at the State Forest. This information will give MD DNR a better handle on how much collecting occurs on State Forests. MD DNR intends to continue to monitor permit numbers. During this past 2011 harvest season MD DNR issued the following permits: Green Ridge = 3 permits; Savage River = 28 permits; Potomac-Garrett = 8 permits.

Additionally, work has continued through a study and subsequent paper by the MD Natural Heritage program, lead by Chris Frye, State Botanist, MD DNR Wildlife and Heritage Service. The paper outlined a two-pronged approach. The first part was a review of 30-years of ginseng licenses and harvest reports provided by the MD Department of Agriculture (responsible for licensing and reporting ginseng harvest). The second part of the paper reported on a systematic survey for ginseng in Maryland over four weeks from May 24-June 21, 2012. The Action Summary of the paper stated for ginseng (*panax quinquefolius*): Upgrade state rank to S2-S3 commensurate with reduced viability of populations and increased threats from harvest and deer browse. Recommend closure of state wildlife management areas and state forests to American ginseng harvest.

A final decision on the status of this CAR will be made at a later date following review by DNR



	EVIDENCE OF CONFORMANCE SUBMITTED WITH THIS FORM <i>(please list)</i> Ginseng Harvest memo to SCS	
	FME Representative Name and Title Jack Perdue	Date 10/16/12
TO BE COMPLETED BY SCS REPRESENTATIVE	<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i> MD DNR has put extensive work and research into addressing the issues underlying this Major CAR. MD DNR is reaching the final stage of the process, which will entail a full review by DNR and a final decision on how to best manage the harvest. Given that the current ginseng harvest season is ongoing and a full DNR review of the issue cannot be completed until after the harvest season, closure of this CAR has been extended for one three month period. The final date by which evidence to ensure closure is due is January 26 <sup>th</sup> , 2013.	
	<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED TO MAJOR <input checked="" type="checkbox"/> OTHER DECISION <i>(refer to description above)</i>	
	SCS Representative Name and Title (CAR/OBS reviewer) Liz Forward	Date of Acceptance of Corrective Action 10/17/12
<i>Press Enter twice below table to leave a space, then copy and paste table below for each CAR/OBS</i>		

TO BE COMPLETED BY SCS REPRESENTATIVE	<b>CAR/OBS Number</b> (e.g. 1, 2, ...)		<b>3</b>
	<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input checked="" type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>		
	<b>Site CAR/OBS issued to</b> (where more than one site)		State Office – relates to state forests in the western region
	<b>Deadline for Corrective Action by FME</b>		
	<input type="checkbox"/> 3 months from above Date of Issuance <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> Other deadline (specify):		
	<b>Standard and Requirement Reference</b>		FSC-US Forest Management Standard, Section 6.2.b
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence) When RTE species are present or assumed to be present, modifications in management have not always been made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats.  Evidence: Modifications in management have not been presented in order to maintain, restore or enhance the maintenance or protection of one S3 and CITES-listed species, American ginseng. In the case of other RTE species, adequate protection measures have been established.			
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation) When RTE species are present or assumed to be present, modifications in management must be made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation measures must be based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.			

<b>TO BE COMPLETED BY FME</b>	<b>IMPLEMENTED CORRECTIVE ACTION</b> <i>(Response to Observations is optional)</i> Describe action taken by the FME to address the root cause of the non-conformity	
	<b>EVIDENCE OF CONFORMANCE SUBMITTED WITH THIS FORM</b> <i>(please list)</i>	
	FME Representative Name and Title	Date
<b>TO BE COMPLETED BY SCS REPRESENTATIVE</b>	<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i>	
	<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED TO MAJOR <input type="checkbox"/> OTHER DECISION <i>(refer to description above)</i>	
	SCS Representative Name and Title (CAR/OBS reviewer)	Date of Acceptance of Corrective Action
Press Enter twice below table to leave a space, then copy and paste table below for each CAR/OBS		

TO BE COMPLETED BY SCS REPRESENTATIVE	<b>CAR/OBS Number</b> (e.g. 1, 2, ...)		<b>4</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>Site CAR/OBS issued to</b> (where more than one site)		State Office – relates to state forests in the western region
	<b>Deadline for Corrective Action by FME</b>		
<input type="checkbox"/>	3 months from above Date of Issuance		
<input type="checkbox"/>	Next audit (surveillance or re-evaluation)		
<input type="checkbox"/>	Pre-condition to certification		
<input checked="" type="checkbox"/>	Other deadline (specify): (1) Immediate - Cease use of 2,4-d. (2) File derogation for use of FSC and receive approval before any future use of 2,4-d on certified land.		
<b>Standard and Requirement Reference</b>		FSC-US Forest Management Standard, Section 6.6a	
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence)			
Products on the FSC list of Highly Hazardous Pesticides have been used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).			
MD DNR applied Weeddestroyer AM-40 Amine Salt, the active ingredient of which is 2-4-d, to control weeds around campsites and an overlook. 2-4-d is on the FSC list of Highly Hazardous Pesticides and as such its use is prohibited. This certificate holder does not hold a derogation for the use of this chemical.			
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation)			
Submit to SCS evidence that MD DNR has ceased the use of 2,4-D.			

<b>TO BE COMPLETED BY FME</b>	<b>IMPLEMENTED CORRECTIVE ACTION</b> <i>(Response to Observations is optional)</i> Describe action taken by the FME to address the root cause of the non-conformity  The FME representative contacted the forest manager and sent the FSC policy to all the state forest managers to provide insight to what has happened. Also directed the state forest manager to immediately cease use of the chemical in question and to remove it from their premises. He has stated that he understands that use is to cease immediately and will remove the chemical from the premises within the week. He was under the assumption that their use of this chemical was exempted and was assured that this was not the case and this was a misunderstanding.	
	<b>EVIDENCE OF CONFORMANCE SUBMITTED WITH THIS FORM</b> <i>(please list)</i>  	
	FME Representative Name and Title	Date
<b>TO BE COMPLETED BY SCS REPRESENTATIVE</b>	<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b> <i>(Describe conclusion in detail)</i> Based on this email communication from MD DNR that includes adequate evidence that this manager has ceased use of 2,4-d, the auditor has closed this CAR.  MD DNR will research other chemicals to use for these control situations. MD DNR does not intend to file for a derogation at this time.  <input checked="" type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED TO MAJOR <input type="checkbox"/> OTHER DECISION <i>(refer to description above)</i>	
	SCS Representative Name and Title <i>(CAR/OBS reviewer)</i> Anne Marie Kittredge, Lead Auditor	Date of Acceptance of Corrective Action June 4, 2012
Press Enter twice below table to leave a space, then copy and paste table below for each CAR/OBS		