Indiana Department of Natural Resources – Division of Forestry
2021 SFI Forest Management Public Summary Audit Report

Introduction

Indiana Department of Natural Resources Division of Forestry (DOF) has demonstrated conformance to SFI® 2015-2019 Standard and Rules, Section 2 – Forest Management Standard in accordance with the NSF certification process.

Forest Management on Indiana State Forests

Source: https://www.in.gov/dnr/forestry/9656.htm

The Indiana Department of Natural Resources Division of Forestry has managed state forest lands for more than 100 years, during which time once abused and abandoned land has been restored to nearly 160,000 acres of lush and healthy forests seen in Indiana today.

Indiana law dictates that DNR Forestry "protect and conserve timber, water resources, wildlife and topsoil in forests owned and operated by the division of forestry" and use "good husbandry" to remove timber that has substantial commercial value "in a manner that benefits the growth of saplings."

There are those who object to this public policy and repeatedly demand DNR Forestry stop doing its job. In contrast, a Purdue University public opinion survey of Indiana residents found that 95 percent of Hoosiers approve of removing trees to protect woodlands from disease and fire.

DNR Forestry – staffed by professional foresters and other scientists with a combined 500-plus years of field experience – is evaluated annually by the Forest Stewardship Council® and the Sustainable Forestry Initiative® program. For 10 consecutive years, these two independent audits have certified DNR Forestry meets nationally and internationally recognized standards for sustainable forestry management.

The audit was performed by NSF October 11-14, 2021 by a team headed by Keri Yankus, Lead Auditor. Audit team members fulfill the qualification criteria for conducting audits contained in SFI 2015-2019 Standards and Rules, Section 9 - Procedures and Auditor Qualifications and Accreditation.

The objective of the audit was to assess conformance of the firm's SFI Program to the requirements of the SFI 2015-2019 Standard and Rules, Section 2 – Forest Management and Multi site requirements.

The scope of the audit included forest management operations. Forest practices that were the focus of field inspections included those that have been under active management over the planning period of the past 3 years. In addition, practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example), SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were also within the scope of the audit.

The SFI Standard was used without modifying any requirements.

Audit Process

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable requirements. The plan provided for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of conformance. NSF also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF protocols. NSF selected and interviewed stakeholders such as contract loggers, landowners, and other interested parties, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented. NSF used a formal planning process to confirm the scope of the audit, review the SFI Indicators and evidence to be used to assess conformance, verify that INDNR was prepared to proceed to Re- Certification Audit, and to prepare a detailed audit plan. NSF then conducted the Re-Certification Audit of conformance to the SFI, Section 2. A report was prepared, and final approval was done by an independent Certification Board member assigned by NSF. Follow-up or Surveillance Audits are required by SFI, Section 9. The first Surveillance Audit is scheduled for week of November 28 thru Dec. 2, 2022.

The multi-site certificate covers 19 state forests including the central office located in Indianapolis IN. The 2021 audit included office reviews in the following state forests Clark State Forest, Harrison-Crawford State Forest, Ferdinand-Pike State Forest,

and the central office located in Indianapolis, IN. Field visits were conducted in 3 out of a total of 19 State Forests due to Covid 19 travel restrictions. This sample size was determined using the guidelines set forth in IAF-MD1. The State Forests were selected based on a date rotation of total 15 State Forests, 2 State Recreation Areas. Approximately half of the field sites visited were randomly sampled. Within the 3 state forests NSF's lead auditor selected field sites for inspection based upon the risk of environmental

impact, likelihood of occurrence, special features, and other criteria outlined in NSF's protocols and procedures. 3 field offices, 1 central office, and 22 field sites were covered. Out of the 22 field sites 1 active timber harvest (hardwood thinning), 2 over story removals, 3 recently closed sales with wildlife considerations, 2 with herbicide applications with invasive species, 1 natural regeneration, 1 planting site, 3 recreation sites, 2 inactive harvest, and 3 cultural resources sites were visited. There were also several roads, several smaller road-trail/stream crossings with cross drains and BMPs being applied. The Strategic Plan for INDNR associated inventory and growth data as well as harvest-related planning documents are used to ensure that plans include long term harvest level and consistent with the growth and yield model generated.

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2021 Overview of Audit Findings

Indiana Division of Forestry's SFI Program was found to be in conformance with the standard there were no major non-conformances, 1 minor non-conformances, and 4 opportunities for improvement.

Minor nonconformance(s)

Objective 1 Performance Measure 1.1.1 Forest Management planning at a level appropriate to the size and scale of the operation.

This process is not fully effective for Forest Management planning

Evidence: IDNR's high-level, strategic statewide management plan, the IDNR Strategic Direction, is updated at five-year intervals. The most recent version is out of date, considering its stated validity period of 2015-2019. Currently there is no documented evidence of an amendment. DNR personnel attest that a replacement version is in draft, but the date by which the new version will be released is unknown.

Opportunity for Improvement(s)

Objective 2: Performance Measure 2.1.1. Planting program. Although the process appears to be conforming, the organization is in early stages of seedling planting process under the Million Tree Initiative Year 2 of a 5-year initiative. There is an opportunity to improve tracking system of recently planted seedlings to ensure regeneration and prompt reforestation occurs.

Objective 13: Performance Measure 13.1.1. Public Land Management. Although the process appears to be conforming, there is an opportunity to improve public land planning transparency how stakeholder comments are being documented, considered, and processed.

Objective 14: Performance Measure 14.2.2. Record Keeping for all categories of the information for the SFI annual report. Although it appears to be conforming, there is an opportunity to consider improved record keeping ensuring all categories of information needed for the SFI annual process report reflects all activities within the program.

Objective 15: Performance Measure 15.1.1. Internal Audits. Although it appears to be conforming, there is an opportunity to improve the internal audit processes to cover all aspects of the SFI standard.

NSF also identified the following area where forestry practices and operations of Indiana Division of Forestry's SFI Program exceed the basic requirements of the standard:

Exceeds the Requirements

Objective 6 Protection of Special Sites

To manage lands that are geologically or *culturally important* in a manner that takes into account their unique qualities.

This is an exceptional program and exceeds the requirements for mapping, cataloging and management of identified special sites of archeological and cultural significance by the INDNR staff archaeologist.

General Description of Evidence of Conformity

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

Objective 1   Forest Management Planning

To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion.

Summary of Evidence: The Indiana State Forest Strategic Plan 2015-2019, Indiana DNR State Forest Properties Report of Continuous Forest Inventory (CFI), state forest resource management guides, and the associated inventory data and growth models were the key evidence of conformance.

Objective 2   Forest Health and Productivity

To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, afforestation, minimized chemical use, soil conservation, and protecting forests from damaging agents**.**

Summary of Evidence: Field observations and associated records were used to confirm practices. DOF has programs to ensure reforestation, for protection against damaging agents and wildfire, and for careful management of activities which could potentially impact soil and long-term productivity.

Objective 3   Protection and Maintenance of Water Resources

To protect the water quality of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices.

Summary of Evidence: A program of adherence to and extensive monitoring of State BMPs coupled with field observations of a range of sites were the key evidence. Auditors visited the portions of field sites that were close to water resources

Objective 4   Conservation of Biological Diversity

To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote a diversity of types of habitat and successional stages, and the conservation of forest plants and animals, including aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.

Summary of Evidence: Use of the Natural Heritage Database, State Forest Procedure Manual, a comprehensive Environmental Assessment, the Nature Preserve program, State Wildlife Action Plan, State Forest Strategic Plan, field observations, policies for the conservation of the Federally listed bats, and employment of an experienced wildlife biologist were the evidence used to assess the requirements involved in biodiversity conservation.

Objective 5   Management of Visual Quality and Recreational Benefits

To manage the visual impact of forest operations and provide recreational opportunities for the public.

Summary of Evidence: Indiana Division of Forestry provides excellent recreational opportunities for the public including walking, biking, and horse trails, camping and access to lakes and ponds. Records and field sites were reviewed to assess methods and results in visual management.

Objective 6   Protection of Special Sites

To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.

Summary of Evidence: Field observations of completed operations, records of special sites, interviews with staff archeologist, and visits to special sites were all evidence for protection of special sites.

Objective 7   Efficient Use of Fiber Resources

To minimize waste and ensure the efficient use of fiber resources.

Summary of Evidence: Field observations of completed operations, contract clauses, and discussions with supervising field foresters as well as the Forest Products Specialist provided the key evidence.

Objective 8   Recognize and Respect Indigenous Peoples' Rights

To recognize and respect Indigenous Peoples' rights and traditional knowledge.

Summary of Evidence: Policies and systems for receiving and responding to requests were used to determine conformance.

Objective 9   Legal and Regulatory Compliance

To comply with applicable federal, provincial, state and local laws and regulations.

Summary of Evidence: Field reviews of ongoing and completed operations and systems used to ensure conformance were the evidence.

Objective 10   Forestry Research, Science and Technology

To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.

Summary of Evidence: DOF supports a variety of forestry research initiatives, including the Hardwood Ecosystem Experiment -- a collaborative research project that currently includes partnering organizations and agencies including researchers from six regional universities.

Objective 11   Training and Education

To improve the implementation of sustainable forestry practices through appropriate training and education programs.

Summary of Evidence: Training records of selected personnel, and records associated with harvest sites audited were the key evidence for this objective.

Objective 12   Community Involvement and Landowner Outreach

To broaden the practice of sustainable forestry through public outreach, education, and involvement, and to support the efforts of SFI Implementation Committees.

Summary of Evidence: Indiana Division of Forestry has web site which provides the opportunity for review of resource management guides, timber sales, and also includes an on-line comment form. This together with a variety of trainings, public outreach events, and outreach to neighboring landowners comprised the evidence.

Objective 13   Public Land Management Responsibilities

To participate and implement sustainable forest management on public lands.

Summary of Evidence: Indiana Division of Forestry seeks input into management decisions including the comment period for resource management guides, the currently applicable strategic plan, and the draft Indiana Bat Habitat Conservation Plan for State Forests. Each state forest has a variety of opportunities for interactions with the public as identified in objective 12.

Objective 14   Communications and Public Reporting

To increase transparency and to annually report progress on conformance with the SFI Forest Management Standard.

Summary of Evidence: Reports filed with SFI Inc. Review of the SFI Inc. website provided the key evidence.

Objective 15   Management Review and Continual Improvement

To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.

Summary of Evidence: Records of program reviews, agenda, and notes from management review meetings, and interviews with personnel from all involved levels in the organization were assessed.

Relevance of Forestry Certification

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

1.   Sustainable Forestry

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

2.   *Forest Productivity and* Health

To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain *long-term* forest and soil *productivity*. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, *invasive exotic plants and animals* and other damaging agents and thus maintain and improve *long-term forest health* and *productivity*.

3.   *Protection* of Water Resources

To protect water bodies and *riparian areas* and to conform with forestry *best management practices* to protect water quality.

4.   *Protection* of *Biological* Diversity

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

5.   Aesthetics and Recreation

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

6.   *Protection* of *Special Sites*

To manage lands that are ecologically, geologically or *culturally important* in a manner that takes into account their unique qualities.

7.   Responsible *Fiber Sourcing* Practices in North America

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

8.   Legal Compliance

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

9.   Research

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

10.   Training and Education

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

11.   Community Involvement and Social Responsibility

To broaden the practice of *sustainable forestry* on all lands through community involvement, socially responsible practices, and through recognition and respect of *Indigenous Peoples'* rights and *traditional forest-related knowledge*.

12.   Transparency

To broaden the understanding of forest certification to the *Fiber Sourcing* Standard by documenting certification audits and making the findings publicly available.

13.   Continual Improvement

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

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

Applies only to the SFI 2015-2019 Fiber Sourcing Standard

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

Source: *Sustainable Forestry Initiative® (SFI) Standard, 2015–2019 Edition*

For Additional Information Contact

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