# Sustainable Forestry Initiative® Forest Management Audit Report

## Indiana Department of Natural Resources, Division of Forestry Certificate #SCS-SFI/FM-00099N

SFI 2022 Standards and Rules®, Forest Management Surveillance Transfer Audit

Client Address	Indiana Department of Natural Resources, Division of Forestry, 402 W.
	Washington, Room W-296, Indianapolis, IN 46204, USA
Client Contact	Brenda Huter, Stewardship Coordinator; Jack Seifert, State Forester
Client Website	https://www.in.gov/dnr/forestry/

#### SCS Contact:

#### **Maggie Schwartz**

Managing Director, Forestry Natural Resources Division

mschwartz@scsglobalservices.com



#### **TABLE OF CONTENTS**

SE	ECTION A – PUBLIC SUMMARY	3
FC	DREWORD	3
	ORGANIZATION OF THE REPORT	
1.	GENERAL INFORMATION	4
	1.1 Name, Contact, and Certificate Information	4
2.	SUMMARY DESCRIPTION OF THE MANAGEMENT UNIT(S)	5
3.	AUDIT PROCESS	6
	3.1 Applicable Standards and Audit Objectives	6
	3.2 AUDIT TEAM	
	3.3 TOTAL TIME SPENT ON AUDIT	
	3.4 SUMMARY OF AUDIT ITINERARY AND SITE VISITS	
	3.5 EVALUATION OF MANAGEMENT SYSTEMS	
	3.6. Changes to Management System	8
	3.7 CONFIRMATION OF MEETING AUDIT OBJECTIVES	9
4.	RESULTS OF AUDIT	9
	4.1 GRADING OF POSSIBLE FINDINGS.	
	4.2 Table of Audit Results and History of Findings for Certificate Period	9
	4.3 GENERAL DESCRIPTION OF EVIDENCE OF CONFORMITY	
	4.4 Existing Corrective Action Requests, OFIs, and Exceeds	12
	4.5 NEW CORRECTIVE ACTION REQUESTS, OFIS, AND EXCEEDS	
5.	CERTIFICATION DECISION	18

## **Public Summary Report**

## SFI® Forest Management Standard

#### **SECTION A – PUBLIC SUMMARY**

#### **Foreword**

#### **Organization of the Report**

This report of the results of your audit assessment is divided into two sections. Section A provides the public summary and background information that is required by the Sustainable Forestry Initiative® Section A is made available to the public and is intended to provide an overview of the audit process, the management programs and policies applied to the forest, and the results of the audit. Section A will be posted on the SFI website and Section B contains more detailed results and information for required SFI record-keeping or for use by the Certified Organization.

#### **Principles of SFI Forest Management**

The SFI 2022 Standards and Rules® for Forest Management promotes sustainable forestry and includes measures to protect water quality, biodiversity, wildlife habitat, species at risk and Forests with Exceptional Conservation Value.

The 13 SFI Principles for Forest Management are:

- 1. **Sustainable Forestry:** To practice sustainable forestry to meet the needs of the present while promoting 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, climate change mitigation, 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 species 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, to meet the needs of both human communities and ecological systems.
- 4. **Protection of Biological Diversity:** To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, ecologically important species and

- native forest cover 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 important, geologically or culturally important in a manner that takes into account their unique qualities.
- 7. **Responsible Fiber Sourcing in North America:** To use and promote among other forest landowners' sustainable forestry that is 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 Forest Management 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.

#### 1. General Information

#### 1.1 Name, Contact, and Certificate Information

Organization Name	Indiana Department of Natural Resources, Division of Forestry	
Certification	Brenda Huter, Stewardship Coordinator	
Representative	Jack Seifert, State Forester	
Phone Number (317) 232-0142		
	Indiana Department of Natural Resources	
Address	Division of Forestry	
Address	402 W. Washington, Room W-296	
	Indianapolis, IN 46204, USA	
Audit Dates 16-18 Oct 2023		
	☐ Single	
SFI Certificate Type	☑ Multi-site. This Audit covered the requirements of the central organization and a subset	
3ri certificate Type	of sites. These sites were selected based on proximity and length of time since previous	
	audits. See Summary of Audit Itinerary for details of sampling.	

## 2. Summary Description of the Management Unit(s)

Description of Ownership	The multi-site certificate covers state forests with overall management through the central office located in Indianapolis, IN. The Division of Forestry (DoF) is a unit of the Department of Natural Resources (DNR), a state agency within the executive branch of the Indiana state government. DoF divides the State Forests (Properties) into management units as given in Description of Sites below. Properties are divided into compartments and tracts for purposes of management planning, operations, monitoring, and recordkeeping.  https://www.in.gov/dnr/forestry/properties/			
Total Forest Area (Acres)	160,251			
		Il sites/FMUs under scope	of the certificate. Full listings, not Audit Matrix) and on DNR websit	
	Number	Managing Office	State Forest	Sampled
	1	Clark State Forest	Clark State Forest	
	2	Ferdinand State Forest	Ferdinand State Forest Pike State Forest	
	3	Greene-Sullivan State Forest	Greene-Sullivan State Forest	
	4	Harrison-Crawford State Forest	Harrison-Crawford State Forest	
Description of Sites under Scope	5	Jackson-Washington State Forest	Jackson-Washington State Forest	Х
	6	Martin State Forest	Martin State Forest	Х
	7	Morgan-Monroe State Forest	Morgan-Monroe State Forest, Ravinia State Forest	
	8	Owen-Putnam State Forest	Owen-Putnam State Forest	
	9	Salamonie River State Forest	Frances Slocum State Forest, Salamonie River State Forest	Х
	10	Selmier State Forest	Selmier State Forest	Х
	11	Yellowwood State Forest	Yellowwood State Forest, Mountain Tea State Forest	
			scope of certificate, including acres	5.
Management Unit Mars	·	cription of group structure n.gov/dnr/forestry/propert		
Management Unit Maps				that encompass
Forest Types and Key Ecological Features	There are at least 9 major cover types across the state properties of Indiana that encompass around 50 species of trees. However, the primary cover may be classified into the following types: Dry Oak-Hickory, Mesic Oak-Hickory, Bottomland Oak-Hickory, Beech-Maple, Pine/Conifer (generally planted), Upland Mixed Hardwoods, and Mixed Bottomland Hardwoods.  State-wide, DNR state forests are guided by a Forest Action Plan (FAP) and 2015-2022 Strategic Plan. The most recent FAP is 2020, found <a href="here">here</a> . Information about the 2015-2022 Strategic Plan and the draft 2023-2027 Strategic plan, currently receiving public comments, are located <a href="here">here</a> . All state forest and forest recreation area properties are organized into <a href="compartments">compartments and tracts</a> . The forest recreation areas are part of the state forest land			
Forest Management Planning				

	base. Compartments are the largest land administration unit below the state forest property level. Compartments are generally 500 to 1,500 acres of relatively contiguous holdings. Generally, compartments are not used for specific site planning and recordkeeping, but may be used for broader activity planning. For example, compartments are generally the basis for landscape analyses of wildlife habitat assessments, particularly for wider-ranging or more widely distributed species. <i>Tracts</i> are the primary land administration unit for management activity planning, monitoring and recordkeeping. Tracts are subdivisions of compartments. Typically tracts will contain 30 to 120 acres of contiguous holdings. Geographic isolation, distinct community types, identifiable boundaries, or other factors may be the basis for tract separations. Most inventories, activities, planning, and recordkeeping will be based on tracts.
Sustainable Harvest Level Assessment	DoF current harvest target is 10 MMBF. Currently, actual harvest levels are well below this target. Current growth is based on a continuous forest inventory (CFI) system with over 4,000 plots. One fifth of the plots on the state forest land base is measured each year. Growth based on a rolling 5-year average CFI data. Based on 2017-2021 CFI, net growth was 12.8 million BdFt and gross growth 22.1 million BdFt.
Monitoring Program Description	DOF has developed monitoring protocols that are systematically implemented and replicable. Monitoring protocols are documented to ensure consistency between state forests. Results are published on the DNR website. System-wide inventories follow procedures as described in the Resource Inventory section of the <a href="Procedures Manual">Procedures Manual</a> and as guided by <a href="State Regulations">State Regulations</a> . Additionally, DOF is directed by many different planning documents, and each has different monitoring strategies. Of primary interest under SFI is the state forestry BMP monitoring which is done for all timber sales. Additional monitoring includes: Stump audits, Forest Health Protection monitors insect and disease levels annually; Division of Fish and Wildlife has monitoring routines from annual surveys to more periodic surveys, depending on species of interest; Division of Forestry monitoring program includes typical weekly inspections of active timber sales, annual 2nd-party monitoring of BMPs, 20-year monitoring of the inventory, and 5-year statewide permanent plot inventory analysis through FIA; Other inventories/monitoring on DOF properties includes Nature Preserves (FORI), fish population monitoring, and cultural/archaeological resource inventory.

### 3. Audit Process

## **3.1** Applicable Standards and Audit Objectives

Certificate Code	SCS-SFI/FM-00099N		
	☐ Stage 1, Preliminary Review Audit	☐ Stage 2, Certification Audit	
	☐ Re-Certification	☐ COVID-19 Additional Surveillance	
Audit Type	$\square$ 1 <sup>st</sup> , $\boxtimes$ 2 <sup>nd</sup> , $\square$ 3 <sup>rd</sup> or $\square$ 4 <sup>th</sup> Surveillance		
	☐ Transfer	☐ Expansion of Scope	
	☐ Other (describe):		
	□ SFI: 2022 Forest Management. Objectives 1-17: 3, 5, 6, 11, 13, 14, 15		
	☐ SFI: Rules for Use of SFI On-Product Labels and Off-Product Marks		
Applicable Standards	⊠ SFI: Audits of Multi-Sites		
Applicable Standards	☐ ATFS: Forest Management, 2021. Standards 1-8		
	☐ ATFS: AFF 2021 Standards for Independently Managed Groups. Sections 1-4		
	☐ ATFS: ATFS 2021 Logo Use Guidelines		

	☐ N/A, this is not a multi-standard nor a multi-CB audit.			
		□ Joint	□ Integrated	
	A combined audit is	A joint audit is when	An integrated audit is when a client has	
Multiple Standards	when a client is	two or more auditing	integrated the application of requirements of	
manapre standards	being audited	organizations	two or more	
	against the	cooperate to audit a	management systems standards into a single	
	requirements of two	single client.	management system and is being audited	
	or more		against more than one standard.	
SFI Substitute or Modified	✓ None □ Ves Sub	stitute or Modified Indica	ators used and justification:	
Indicators	□ None, □ res, sub.	stitute of Wiodiffed Malet	ators used and justification.	
	This certification includes land management operations on approximately 160,251 acres of			
	Indiana State Forests and related sustainable forestry activities including SFI Objectives 1-17.			
	The scope of the certificate includes all forest management activities associated with the Organization's sustainable forest management system with defined forest lands located in Indiana and including the harvest, transport, and sale or trade of forest products, and other forest management system activities for the Audit Objectives. The Organization has			
Certificate Scope/				
Statement				
	sufficient control over	any contracting or outso	ourcing of forest management planning and	
	activities to ensure conformance to applicable certification requirements.			
	Properties sampled: Ja	ackson-Washington, Mar	tin, Selmier, Salamonie River and Frances	
Description of Sampling	Slocum State Forests.	DoF staff provided lists of	of all management activities from which	
Approach	auditors selected active and inactive sites (see Audit Plan for descriptions). Selections were designed to maintain objectivity and efficiency.			
<b>Deviations from the Audit</b>	Were there any signifi	cant deviations from the	Audit Plan?	
Plan	☑ No ☐ Yes. If yes, provide a description and explanation.			

#### 3.2 Audit Team

Auditor name:	Daniel Simonds	Auditor role:	Lead Auditor	
Qualifications:	ıltant, trained at th	ne UMaine College of Forestry		
	(BS 1982), and a Maine-licensed Professional Forester (Maine #884) with 40 years of practical			
	experience in the forest products industry. A qua	alified lead auditor	for FSC, SFI, & PEFC Forest	
	Management and Chain of Custody systems, he h	as 20 years of full-	-time experience in third party	
	certification systems.	1		
Auditor name:	Evan Poirson	Auditor role:	Team Auditor	
Qualifications:	Evan is the Senior Program Associate for the Fore			
	the program since 2015. He has been a Lead FSC	Forest Manageme	nt auditor since 2018, and a Lead	
	FSC COC auditor since 2020. He has conducted Fo	_	=	
	audits in Argentina, Costa Rica, Dominican Republic, Ghana, Honduras, Mexico, Panama, Paraguay,			
	Spain, South Korea, and in several regions of the		G.	
	include managing the administrative and quality-related aspects of forest management operations			
	at SCS headquarters in California. He holds degrees in Biology (conservation emphasis) from			
	Occidental College (B.A., 2009) and Environmental Management from Duke University (M.E.M.,			
	2014). In 2010-12, he served as an environmenta	l volunteer of the	United States Peace Corps in the	
	Dominican Republic.			
Auditor name:	Stirling Griffin	Auditor role:	Technical Expert	
Qualifications:	Sterling is a California Registered Professional Forester living in Corvallis, Oregon. He is a graduate of Purdue University with a degree in Forest Management. His career began with the U.S. Forest Service where he participated in long-term ecosystem productivity research in the Pacific Northwest. He later founded a consulting firm serving private landowners managing timber, water,			
	recreation, fire protection, and biodiversity. In 20	•		
	program and later founded one of the largest U.S. developers of forest carbon credits. He is			

	passionate about sustainability, personal health and fitness, and enjoys exploring wild places
	around the world.

#### 3.3 Total Time Spent on Audit

A.	Number of days spent on-site for the Audit	3
В.	Number of auditors participating in on-site audit	2
C.	Number of days spent by any technical experts (in addition to amount in line A)	3
D.	Additional days spent on preparation, stakeholder consultation, and follow-up	3
E.	Total number of person days used in audit	11

#### 3.4 Summary of Audit Itinerary and Site Visits

Location(s) sampled	Jackson-Washington, Martin, Selmier, Salamonie River, and Frances Slocum State Forests
Number of field sites	11
Summary of Cover Types	Central or mixed upland hardwoods, with occasional included wetland and riparian types.
visited	Edge communities (between forest & agricultural clearings) are common.
Summary Description /Number of Silviculture Activities inspected	Intermediate and improvement cuttings are the dominant management activity observed, followed by invasive vegetation control. Specific details of site visits are noted below in Site Notes. Auditors selected field visits from a summary of recent activity provided before the audit. Adaptive changes to the audit plan were included in the field.
Summary Description /Number of Harvest Areas inspected	Ten timber sales visited during the audit. See Site Notes for detailed observations.
Summary Description of Road infrastructure inspections	Road systems were examined throughout the course of the audit with road maintenance, culverts and other drainage structures. Recreational trails, campgrounds, and kiosks were also observed throughout the audit. See Site Notes for detailed observations.

#### 3.5 Evaluation of Management Systems

SCS deploys teams with expertise in forestry and other relevant fields to assess the certified organization's conformance to SFI standards and policies. Audit methods include reviewing documents and records, interviewing personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing relevant stakeholder input. When there is more than one team member, each member may review parts of the standards based on their background and expertise. Applicable aspects of the Management System under evaluation, such as Management System Review and other relevant Objectives, Performance Measures, and Indicators will also inform the audit team. On the final day of an evaluation, team members convene to deliberate the findings of the audit jointly. This involves an analysis of all relevant field observations, interviews, reviewed documents and records, and relevant stakeholder input. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

#### 3.6 Changes to Management System

☑ There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the SFI standards, rules, and policies.

$\ensuremath{\mathbb{I}}$ Significant changes that affect the management system occurred since the last audit d	escribed as
follows (describe):	

#### 3.7 Confirmation of Meeting Audit Objectives

- 1. Determination of the conformity of the client's management system, or parts of it, with audit criteria (Selected Objectives, Performance Measures, and/or Indicators).
- 2. Determination of the ability of the management system to ensure the client meets applicable statutory, regulatory and contractual requirements.
- 3. Determination of the effectiveness of the management system to ensure the client can reasonably expect to achieve specified objectives.
- 4. As applicable, identification of areas for potential improvement of the management system.

The objectives for this audit included:

Audit Objectives were met	Yes ⊠ No ☐ If no, provide an explanation:
A Doculto of Audit	

#### 4. Results of Audit

#### 4.1 Grading of Possible Findings

Once a consensus is reached by the audit team, determinations of grading are made as to the level of findings. Grading of findings may occur as follows:

- Major CARs: Major Corrective Action Requests (CARs) occur when one or more of the SFI 2022 Standard(s) performance measures or indicators has not been addressed or has not been implemented to the extent that a systematic failure of a Certified Organization's SFI system to meet an SFI objective, performance measure or indicator occurs.
- *Minor CARs:* An isolated lapse in SFI 2022 Standard(s) implementation which does not indicate a systematic failure to consistently meet an SFI objective, performance measure or indicator.
- Opportunities for Improvement: Opportunities for Improvement (OFIs) are identified by audit team members where the client is in conformance, but there is a risk to conformance in the future.
   Nonconformance with the standard requirements cannot be recorded as OFIs.
- Exceeds: Practices that exceed the basic requirements of the SFI 2022 Standards and Rules for Forest Management or Fiber Sourcing.

#### 4.2 Table of Audit Results and History of Findings for Certificate Period

This table lists Findings to the Performance Measure and/or Indicator level for each year of the certificate period and is updated annually.

SFI Objective	Cert/Re-cert Evaluation (2021)	1 <sup>st</sup> Annual Evaluation (2022)	2 <sup>nd</sup> Annual Evaluation (2023)	3 <sup>rd</sup> Annual Evaluation (2024)	4 <sup>th</sup> Annual Evaluation (2025)
No findings					
1		Minor 1.1.2			
2	OFI 2.1.1				
3					

4	Minor 4.1.5		
5			
6			
7			
8			
9			
10			
11			
12			
13	Minor 13.1.3		
14	Minor 14.3.2	Minor 14.1.1 (closed)	
15			
16			
17			
COC			
Trademark			
Group			
Other			

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

This section summarizes the general evidence found to verify conformity that is detailed in Appendix 5.

SFI Objective	Summary of Evidence
Objective 1. Forest Management Planning. To ensure	A comprehensive, fully documented, and highly
forest management plans include long-term	transparent set of management plans is reviewed.
sustainable harvest levels and measures to avoid	The system includes inventory, strategic, and
forest conversion or afforestation of ecologically	operational planning documents which can be
important areas.	reviewed online and commented on by the public.
	An active tree planting program is also noted.
	finding 2022.1 closed.
Objective 2. Forest Health and Productivity. To	Not evaluated in 2023.
ensure long-term forest productivity and conservation	
of forest resources through prompt reforestation,	
afforestation, deploying integrated pest management	
strategies, minimized chemical use, soil conservation,	
and protecting forests from damaging agents.	
<b>Objective 3.</b> Protection and Maintenance of Water	Field review included verification of mapped
Resources. To protect the water quality and water	streams, rivers, wetlands, and associated riparian
quantity of rivers, streams, lakes, wetlands, and other	features. Adaptation of land management
water bodies.	activities to these features is also confirmed.
	Implementation of BMP guidance is observed.
<b>Objective 4.</b> Conservation of Biological Diversity	Not evaluated in 2023.
To maintain or advance the conservation of biological	
diversity at the stand- and landscape- level and across	
a diversity of forest and vegetation cover types and	
successional stages including the conservation of	

forest plants and animals, aquatic species, threatened	
and endangered species, Forests with Exceptional	
Conservation Value, old-growth forests and	
ecologically important sites.	
Objective 5. Management of Visual Quality and	Not Evaluated 2023.
Recreational Benefits. To manage the visual impact of	
forest operations and provide recreational	
opportunities for the public.	
Objective 6. Protection of Special Sites. To manage	Indiana DoF has a well-defined, robust process and
lands that are geologically or culturally important in a	system to identify and protect special sites and
manner that takes into account their unique qualities.	species within their land management practices.
manner that takes into account their unique quanties.	Implementation of site review and mitigation
	activities was confirmed during field visits.
<b>Objective 7.</b> Efficient Use of Fiber Resources. To	Utilization standards conform to regional norms.
minimize waste and ensure the efficient use of fiber	Appropriate implementation is confirmed by field
resources.	observations.
Objective 8. Recognize and Respect Indigenous	
	Appropriate policy, outreach and communication,
Peoples' Rights. To recognize and respect Indigenous	and sensitive site mitigation is confirmed.
Peoples" rights and traditional knowledge.	Appropriate policy accessment and mitigation
Objective 9: Climate Smart Forestry	Appropriate policy, assessment, and mitigation
To ensure forest management activities address	plans for Climate adaptation is confirmed.
climate change adaptation and mitigation measures.	Programs are well documented and transparent.
<b>Objective 10.</b> Fire Resilience and Awareness	Not evaluated in 2023.
To limit susceptibility of forests to undesirable	
impacts of wildfire and to raise community awareness	
of fire benefits, risks, and minimization measures.	
Objective 11. Legal and Regulatory Compliance	Organization maintains access to relevant
To comply with all applicable laws and regulations	regulations and laws for personnel and contractors.
including, international, federal, provincial, state, and	Regulatory postings were observed within office
local.	and posted in public viewing areas of State Forest
	Offices. Review of contracts for harvesting, site
	preparation, chemical application and reforestation
	confirmed "compliance to all regulations" language
	was listed. Appropriate respect for legal
	compliance is observed during field review.
Objective 12. Forestry Research, Science and	Financial and in-kind support for appropriate,
Technology. To invest in research, science, and	regionally significant research is confirmed.
technology, upon which sustainable forest	
management decisions are based.	
Objective 13. Training and Education. To improve the	Organization maintains training records and annual
implementation of sustainable forestry through	review for forestry staff. Personnel are
appropriate training and education programs.	professional foresters, maintain membership within
The shires are are an area constant brokening	various forestry associations, and those with
	relevant responsibilities held valid chemical
	applicator licenses. Contractors were verified to
	have valid qualified logger training records.
	nave vanu quanneu logger tranning records.

Objective 14. Community Involvement and	Public Summary Audit Reports observed on SFI, Inc.
Landowner Outreach. To broaden the practice of	website. Review of Annual Progress Report
sustainable forestry through public outreach,	confirms record keeping is adequate and that
education, and involvement, and to support the	reports are submitted within designated time
efforts of SFI Implementation Committees.	requirements.
·	See finding 2023.1.
Objective 15. Public Land Management	Not evaluated 2023.
Responsibilities. To participate and implement	
sustainable forest management on public lands.	
<b>Objective 16.</b> Communications and Public Reporting	Required reporting and survey response is verified.
To increase transparency and to annually report	
progress on conformance with the SFI Forest	
Management Standard.	
Objective 17. Management Review and Continual	A comprehensive and transparent Audit &
Improvement: To promote continual improvement in	Management Review process is confirmed.
the practice of sustainable forestry by conducting a	
management review and monitoring performance.	

## **4.4 Existing Corrective Action Requests, OFIs, and Exceeds**

Finding Number: SFI	Minor 2022.1		
Finding and	☐ Major: Pre-condition to certification		
Deadline	☐ Major: 3 months from Closing Meeting		
	☑ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing		
	☐ OFI: no deadline		
	☐ Exceeds: no deadline		
	☐ Other deadline (specify):		
SFI Indicator:	1.1.2 Actions undertaken on the FMU should be consistent with the management plan		
	and be consistent towards achieving the stated goals and prescribed objectives of the		
	plan.		
⋈ Non-Conformity	☐ Background/ Justification in the case of OFI or Exceeds		
Intense stakeholder	interest at Yellowwood and Morgan-Monroe state forests in recent years has led to the		
suspension of active	harvesting operations at those forests since approximately 2018. This has created a gap		
between the desired	conditions and management objectives as stated in those forests' management plans		
and the forests' present conditions. Rates and methods of timber harvest are used to lead to achieving			
desired conditions and improve or maintain health and quality across the certified forest areas. Stands that			
have not been actively managed shall be returned to desired composition at the earliest practicable time as			
justified in management objectives. Certified Organizations are expected to ensure that forest management			
plans are implemented and activities are completed in a timely manner. The management plans at			
Yellowwood and Mo	Yellowwood and Morgan-Monroe specifically must be updated to reflect the short- and long-term		
management objectives at these forests are in sync with actual management activities carried out on the			
ground.			
<b>Action Plan and</b>	The Division was limited in its fiscal ability to hire forester replacements as well as the		
Root Cause	lack of a new marketing plan, both Morgan-Monroe and Yellowwood State Forests fell		
Analysis (to be	behind on the implementation of plans already approved.		
prepared by	The Division will begin the process of reanalyzing those management plans that have		
Organization)	exceeded the newly implemented 5-year completion timeline and update them where		

	needed. Once they are updated, plans will be reposted for public comment. This			
	process would take up to 12 months to complete. After review of comments received			
	and any possible modifications, finalized plans will be implemented in 2024.			
SCS Review of	☐ Rejected ( <i>explain</i> ):			
Action Plan	SCS representative: <b>Beth Jacqmain</b> Date: <b>1/20/23</b>			
Evidence and	On 17 October 2023, the SCS audit team spoke with DNR Deputy Director, Land			
Actions	Management Team. Smith discussed progress to bring management activities at			
Implemented by	Yellowwood and Morgan-Monroe into agreement with IDOF's stated objectives of six			
Organization	MM-YW RMGs that are pending publication for public comment. Prior to this step, and			
	in the near future, the Land Management Team will launch a communications strategy			
	/ outreach plan that aims to address the primary stakeholder concerns regarding the			
	resumption of active harvesting at these state forests. The audit team has reviewed			
	the outreach plan (a 24-slide PowerPoint entitled "Forestry Outreach Plan 2023 V5")			
	and confirmed rough timelines associated with both its launch and the publication of			
	the RMGs.			
	To address one stated stakeholder concern regarding private profit from harvesting of			
	these public forests, IDOF plans to conduct its own logging operations at these state			
	forests. Auditors discussed IDOF's active identification and provision of funding for this			
	purpose. This arrangement will also allow IDOF to have more direct control over using			
	harvests as an opportunity for public education.			
SCS Review of	The 2023 audit team considers these actions to be sufficient to close this finding. The			
Implemented	2024 audit team will verify that the plan was enacted as planned and that sufficient			
Actions	progress has been made to bring operations at Yellowwood and Morgan-Monroe in			
	line with IDOF's stated objectives for these forests.			
Status of Finding:	⊠ Closed			
	☐ Upgraded to Major			
	$\square$ Other decision (refer to description above)			
Finding At the CELAST to 2000 0				
Finding Number: SF				
Finding and	☐ Major: Pre-condition to certification			
Deadline	☐ Major: 3 months from Closing Meeting			
	☐ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing			
	☐ OFI: no deadline			
	☐ Exceeds: no deadline			
	☐ Other deadline (specify):			
SFI Indicator:	4.1.5. Program to address conservation of ecologically important species and natural			
	communities.			
_	☐ Background/ Justification in the case of OFI or Exceeds			
	Iders to submit proposals for HCVFs, as reviewed via an online letter (published 1 June ps://www.in.gov/dnr/forestry/files/fo-HighConservationValueForests.pdf. After			
· -	a 30-day, online public comment period is initiated.			
	currently conforming to its statement that the entire designation process will "generally			
last up to 6 months." For example, the proposal for HCV designation of the Back Country Area at Morgan-				
Monroe State Forest (https://www.in.gov/dnr/forestry/files/fo-MMSF-BCA.pdf) was submitted for public				
	comment on 1 September 2021, but no determination of whether the proposed area is forest of exceptional			
-	fied Organizations shall conserve biological diversity and this is met, in part by			

recognizing areas of	exceptional value (HCV). DoF has a proced	ure for considering proposed HCVs in a timely	
manner, which they	must follow, particular when timelines are	established within the certified organization's	
own procedures.			
Action Plan and	The Division was again limited by fiscal issues to hire new and support current staff to		
<b>Root Cause</b>	review HCVF's proposals. Individuals peti	tioning HCVF's status were notified both in	
Analysis (to be	emails and directly that the Division was	working on a solution to get appropriate staff	
prepared by	on board to address the HCVF requests.		
Organization)	Staff has been hired and the necessary re	equirements to address the petitions are	
	proceeding. It is expected that both petit	tions will be addressed by the end of 2023.	
SCS Review of	⊠ Accepted	☐ Rejected ( <i>explain</i> ):	
<b>Action Plan</b>	SCS representative: Beth Jacqmain	Date: 1/20/23	
Evidence and	The 2023 audit team revised the HCV nor	mination process as amended by	
Actions	Ecologist/Botanist (hired directly prior to	the 2022 audit and now the sole IDOF	
Implemented by	employee with direct oversight over the I	HCV nomination process). The nomination	
Organization	process was amended in spring 2023. Imp	portant Changes to process include:	
	1.) Stakeholders/proposers must be clear	and specific about the attributes, species, or	
	areas that they are nominating for HCV d	esignation (e.g., they may not suggest that	
	entire forests be set aside as HCV).		
	2.) IDOF review time has been amended to	to be <b>12 months</b> , rather than 6 months. This	
	allows IDOF personnel to consider greater seasonal attributes of proposed HCV areas.		
	The 2022 and the same residenced the decourse of the days of New York		
	The 2023 audit team reviewed the document "Indiana Dept. of Natural Resources- Division of Forestry State Forest Certification High Conservation Value Forests"		
	(https://www.in.gov/dnr/forestry/files/fo-HighConservationValueForests.pdf), which		
	was published in early 2023 on IDOF website and includes instructions for the		
	nomination process and designation decision.		
	Homination process and designation deci	31011.	
	Since the 2022 audit, HCV proposals have been made for Morgan-Monroe, Owen-		
	Putnam (Jordan Creek), and Cucumber Magnolia ( <i>Magnolia acuminata</i> ) occurrences at		
	Clark SF. The final of these has not been completed, while the first two have been		
	decided upon by DOF but are awaiting final approval by the DNR director.		
SCS Review of		at the above evidence is sufficient to close	
Implemented	this finding.		
Actions			
Status of Finding:	⊠ Closed		
	☐ Upgraded to Major		
	$\square$ Other decision (refer to description abo	ove)	
Finding Number: SFI	Minor 2022.3		
Finding and	☐ Major: Pre-condition to certification		
Deadline	☐ Major: 3 months from Closing Meeting		
		evaluation) or 12 months from closing	
	☐ OFI: no deadline	,	
	Exceeds: no deadline		
	Other deadline (specify):		

 $13.1.3.\,Staff\,education\,and\,training\,sufficient\,is\,to\,their\,roles\,and\,responsibilities.$ 

SFI Indicator:

<b>⋈</b> Non-Conformity	☐ Background/ Justification in the case of	of OFI or Exceeds	
Foresters, property managers, and other DoF positions that have roles and/or responsibilities that include			
stakeholder engagements have not received training for related skills such as dispute management, conflict			
resolution, or other types of training that strengthen such activities.			
Interviews with staff	indicated that those who received such tra	iining, in one case over 20 years ago, found it	
helpful when tasked	with receiving stakeholder input and engag	ging with stakeholders.	
Action Plan and	Our evolving culture/society has division	of forestry staff engaging more and more with	
<b>Root Cause</b>	stakeholders. The State of Indiana use to	offer various trainings, which included	
Analysis (to be	conflict resolution. Overtime how and wh	nat type of training the state offered changed	
prepared by	evolving to what it is today. Standard tra	ning such as workplace harassment,	
Organization)	workplace ethics, and cyber security are s	taple training for all staff. The division of	
	forestry requires continuing education cre	edits, like The Society of American Foresters	
	CF requirements, both from internal and	external sources (e.g., meeting, trainings,	
	seminars, workshops, etc.).		
		olving culture/society and is seeking training	
	·	nflict resolution. A training that will better	
		ed challenges of public land management.	
	The current plan is for a training to occur	in 2023.	
SCS Review of	□ Accepted     □	$\square$ Rejected ( <i>explain</i> ):	
Action Plan	SCS representative: <b>Beth Jacqmain</b>	Date: <b>1/20/23</b>	
Evidence and	·	ng (28 February – 2 March 2023), all resource	
Actions	foresters were required to attend a 45-m		
Implemented by	resolution. Furthermore, IDOF plans to in	· · · ·	
Organization		team reviewed DOF's Continuing Education	
	Excel spreadsheet, which shows comprehensive list of meetings, conferences, and		
	trainings attended by all DOF employees.		
SCS Review of	•	ments of this Indicator have been adequately	
Implemented	met by DOF, and that this finding may be	closed.	
Actions			
Status of Finding:	⊠ Closed		
	☐ Upgraded to Major		
	$\square$ Other decision (refer to description abo	ove)	
Finding Number: SFI			
Finding and	☐ Major: Pre-condition to certification		
Deadline	☐ Major: 3 months from Closing Meeting		
		valuation) or 12 months from closing	
	☐ OFI: no deadline		
	☐ Exceeds: no deadline		
	☐ Other deadline (specify):		
SFI Indicator:	14.3.2. Process to receive and respond to	public inquiries. See also SFI Definitions,	
	"management responsibilities on public la	ands: Accountability for developing plans and	
	translating public agencies' missions, goal	s, and objectives	
	to an organized set of actions."		
<b>⋈</b> Non-Conformity	☐ Background/ Justification in the case of	of OFI or Exceeds	
During a stakeholder meeting at the 2022 audit, several stakeholders expressed that IDOF's procedures for			
soliciting stakeholder input are difficult to understand and identify online. Some stakeholders claimed that it			

was difficult to understand and find the link between the timber sale number and the corresponding Resource Management Guides. Certified Organizations shall establish, at the state, or other appropriate levels, procedures to address concerns raised by stakeholders, the public or other Certified Organizations regarding management that appears inconsistent with the SFI standards principles and objectives. As noted during previous audits, Indiana Division of Forestry has a number of avenues to receive stakeholder feedback; these mechanisms include open houses, website portal submissions, and direct emails to IDOF staff. The IDOF website includes a page detailing how to submit comments, and on separate pages includes information on archived comments received at past open houses and a compendium of archived public comment summaries at the state forest level. However, in the face of continued stakeholder complaints that have persisted for many years, IDOF is unable to demonstrate that it relies on appropriate dispute resolution procedures to resolve grievances in a timely manner. Particularly in public land management, the certified organization must provide known and accessible means for interested stakeholders to voice grievances and have them resolved; IDOF must develop and follow appropriate dispute or conflict resolution, or reasonable alternative resolution procedures. At a minimum, IDOF must maintain open communications, respond to stakeholder grievances in a timely manner, and demonstrate ongoing good faith efforts to resolve them. See https://forests.org/inconsistentpractices/ for an example of time-bound responses, and see also https://forests.org/wp-content/uploads/2022 SFI StandardsandRules section12.pdf.

#### Action Plan and Root Cause Analysis (to be prepared by Organization)

Currently, all timber sales entered on Forestry Exchange display the compartment and tract(s) in which that timber sale is occurring. The public can then use that information to locate and view the related resource management guides in Archived Management Guides and HCVF on the division's webpage.

To improve this connection the division of forestry will engage MIS/programming staff in 2023 to discuss options for directly linking timber sales to the associated resource management guides. This will require build and test time as well as budgeting to make the modifications to Forestry Exchange. The target for completion will be by the end of 2023. The division of forestry has a process for public input regarding public land management on the

<u>comment/submitting-a-public-comment/</u>. The following statement is listed on the webpage: <u>A summary of comments</u> received and how those comments were addressed will be posted before management plans are implemented. If you feel your comment is not given proper consideration, submit your comment to the <u>State Forester</u>. Management actions related to your comment will be delayed until the State Forester issues a decision.

division's webpage https://www.in.gov/dnr/forestry/state-forest-management/public-

This same guidance appears in the procedure manual available to the public on the division's webpage <a href="https://www.in.gov/dnr/forestry/state-forest-management/procedures-and-regulations/">https://www.in.gov/dnr/forestry/state-forest-management/procedures-and-regulations/</a> in Appendix I J-1: Opportunity for Public Input.

All comments received through the division's comment portal are addressed in a timely manner. All comments submitted through the portal receive an acknowledgment statement/notice and further acknowledge by a separate email from the assistant state forester acknowledging receipt. Each comment is logged and retained as a PDF. Some comments may be addressed in the initial response while others in a more formal process (i.e., comment summary) such as with RMG, program guides, and HCVF proposals.

## SCS Review of Action Plan

□ Accepted
 □ Rejected (explain):

 SCS representative: Beth Jacqmain
 Note: Key to approval is adding the ability, through MIS, to search for timber sales from the known tract location which would make it easier for citizen-owners of Indiana State Forests to search for sales in areas or tracts of

	specific interest.	
Evidence and	The Indiana State Forest Procedure Manu	ıal (revised October 2023), Appendix I J-1:
Actions	"Opportunities for Public Input" contains	information on the 30-day comment period
Implemented by	for draft RMGs and recourse for stakehol	ders who feel their comment has not been
Organization	properly considered (referral to the state forester, at which stage management actions will be delayed until the state forester issues a decision). Stakeholder comments regarding RMGs are "generally responded to within 30 days" (there is no strict time requirement written within the procedures; it is simply noted that comments will be published on the IDOF Public Comments page at the end of the comment period). This appendix serves as IDOF's stated procedure for dispute resolution procedures and resolving grievances regarding proposed management activities.	
SCS Review of	In light of these facts and the evidence pr	esented to close findings 2022.01 and
Implemented	2022.03, the audit team judges that IDOF	has made good-faith efforts to improve and
Actions	clarify its dispute protocols, and that this	finding may be closed.
Status of Finding:	⊠ Closed	
	☐ Upgraded to Major	
	$\square$ Other decision (refer to description above)	

## **4.5 New Corrective Action Requests, OFIs, and Exceeds**

Finding Number:			
Finding and	☐ Major: Pre-condition to certification		
Deadline	☐ Major: 3 months from Closing Meeting		
	☐ OFI: no deadline		
	☐ Exceeds: no deadline		
	☐ Other deadline (specify):		
SFI Indicator:	SFI 2022 Section 2: 14.1.1 and SFI 2022 S	ection 7, Part 6	
<b>⋈</b> Non-Conformity	$\square$ Background/ Justification in the case	of OFI or Exceeds	
The organization doe	es not provide support for efforts of SFI Imp	plementation Committees.	
Action Plan and	Request clarification from SFI staff regarding SIC participation. Determine whether		
Root Cause	indicator 14.1.1 and guidance in SFI 2022 Section 7, Part 6 applies to Indiana DoF.		
Analysis (to be			
prepared by			
Organization)			
SCS Review of	□ Accepted	☐ Rejected ( <i>explain</i> ):	
Action Plan	SCS representative: Daniel Simonds	Date: 18 October 2023	
Evidence and	Review & verification of prior audit trails	which indicated this indicator as 'not	
Actions	applicable' due to the lack of an organize	d SIC in Indiana (NSF recertification reports	
Implemented by	2021, 2016). Request for clarification from SFI staff.		
Organization			
SCS Review of	Upon request, SFI Inc. staff provided ema	il guidance to the Lead Auditor confirming, in	
Implemented	effect, that this indicator is not applicable in Indiana: "email trail (Mouw) – no SIC (15-		
Actions	23 Oct 2023)"		
Status of Finding:	⊠ Closed		
	☐ Upgraded to Major		
	$\square$ Other decision (refer to description abo	ove)	

## 5. Certification Decision

The certificate holder has demonstrated continued overall conformance to the	
applicable Sustainable Forestry Initiative standards. The SCS annual audit team	Yes ⊠ No □
recommends that the certificate be sustained, subject to subsequent annual	
audits and the Certified Organization's response to any open CARs.	
Comments: None	