



Forest Management Certification Review

Pasadena, MD

December 12, 2012

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

AGENDA

1. FSC CARS

• 2 Major CARs

- Ginseng Minor CAR was elevated to a Major nonconformance. State Forester Koehn will recommend to DNR leadership closed ginseng harvest from state forests but recommends that Natural Heritage Service should proceed with monitoring and five years.
- We also received a FSC CAR for use of hazardous pesticides. The forest manager was instructed to cease use of this chemical and remove it from the facility. As a result of this action, this nonconformance was immediately closed.

• 2012.2 REQUESTED CORRECTIVE ACTION

- Ginseng - 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.
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• 2012.4 REQUESTED CORRECTIVE ACTION

- Highly Hazardous Pesticides - MD DNR applied Weedestroyer 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.

Minor CARs

See **Summary of Corrective Action Requests (page 3)**

2. SFI CARS

- Two of three Minor Non-conformances from the 2011 SFI Audit were closed
- See **Summary of Corrective Action Requests**

3. SFI and FSC standards review

- Attachment D - Special Conditions (Spill Kits & clean up)
- Attachment C - Sed & Erosion Control form revised

- HCVF summary (tracking activities within HCVF)
- Spill Kit SOP
- Timber Operation Order update
- Audit reporting docs to State Forest Managers
- Annual Work Plans summaries
- Exotic Invasive Plant policy
- State Forest acreage changes 2012
- State Forest acquisitions update
- Rutting Policy revised
- SFI Annual Report 2012
- WMD Roads/Trails work

4. Other discussions

- FSC had sent out a request for comments on FSC ADVICE 20-007-17 Evaluation of Nurseries in the Management Unit. Our unit read through many other responses to this request and did submit our own.

In summary, from that letter, stated "The Nursery Advice, as it is proposed, will undermine our reforestation efforts in Maryland and severely damage our ability to produce a cost effective seedling that is desired in the marketplace. While the Nursery Advice intent states the desirability of applying FSC Principles and Criteria to the entire supply chain, we feel strongly that it is simply wrong to apply FSC P&C that have been developed for Forest Management to what is essentially an agricultural / horticultural operation. Forest nurseries are not forests. As such, it should be apparent that the Nursery Advice's effort to extend the causal link to nurseries is groundless. At present, FSC certification means simply that the raw materials in a product originated from well-managed forests. Applying Criterion 6.6 to "inputs", such as seedlings from forest nurseries, is as much outside the intent of FSC Principle 6 as would be applying it to "outputs", such as paper production or other forest products manufacturing processes.

- State forest trails and road maintenance work has been submitted to DNR Engineering and Construction. These proposals have been vetted through the review process and have been detailed descriptions of the work to be done. Engineering and construction has reserved \$300,000 of Critical Maintenance money each year until this work is completed.
- New off-road vehicle trail proposals had been vetted through our review process and has resulted in two potential locations. One is on Savage River State Forest. These are being proposed to replace the trail there were closed in 2011 on more sustainable terrain.

Maryland DNR Forest Service
 Forest Certification 2012
 Summary of Corrective Action Requests
 Updated: 2012-12-11

FSC 2012.1 REQUESTED CORRECTIVE ACTION :: Observation

Ref: 5.6.c

Salvage & Restocking - 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.

Issue	Progress	Next Step	Expected Completion	Status
Salvage & Restocking	•	•		

FMU Response:

FSC 2012.2 REQUESTED CORRECTIVE ACTION :: MAJOR (open)

Ref: 5.6.d

Ginseng - 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.

Evidence: Based on interviews with DNR staff, harvest levels have not yet been set.

Issue	Progress	Next Step	Expected Completion	Status
Ginseng	• Received MD DNR	• Ginseng State Forest	01/26/13	Major CAR was

	W&H report on ginseng status	harvest moratorium or establish harvest levels		granted a 3-month extension to Jan 26, 2013.
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FMU Response: We have received a report from the MD DNR Wildlife & Heritage Service which states,
 "Upgrade state rank to S2S3 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."

FSC 2012.3 REQUESTED CORRECTIVE ACTION :: MINOR (open)

Ref: 6.2.b

Ginseng - 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.

Issue	Progress	Next Step	Expected Completion	Status
Ginseng	Received MD DNR W&H report on ginseng status	<ul style="list-style-type: none">Ginseng State Forest harvest moratorium or establish harvest levels	01/26/13	This issue will be decided along with 2012.2

FMU Response: We have received a report from the MD DNR Wildlife & Heritage Service which states,

“Upgrade state rank to S2S3 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.”

FSC 2012.4 REQUESTED CORRECTIVE ACTION :: MAJOR (closed)

Ref: 6.6.a

Highly Hazardous Pesticides - 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.

Issue	Progress	Next Step	Expected Completion	Status
Hazardous Pesticides	<ul style="list-style-type: none">Directive was issued to cease use of this particular pesticide and remove it from the premises of the forest management unit.	<ul style="list-style-type: none">Ensure Highly Hazardous Pesticides list is knownReview annual pesticide use in certification reports.	3/30/13 (annual reports)	CAR closed

FMU Response:

Appropriate documents can be found at:

M:\Common\StateForests\Docs\Certification\Pesticides

<http://pesticides.fsc.org/documents/fsc-pesticides-policy-implementation-guidance>

Sustainable Forestry Initiative

MINOR NON-CONFORMANCES

Indicator 2.3.6 requires '*Criteria that address harvesting and site preparation to protect soil productivity.*' The western forests do not have criteria defining acceptable levels of rutting during harvests."

The finding was raised to a 2012 Major Non-conformance: Maryland DNR Forest Service has developed criteria defining acceptable levels of rutting during harvests, but these measures do not assure protection of soil productivity caused by rutting that is independent of erosion, a documented issue with forest soils.

Maryland DNR Forest Service **will develop and implement a revised policy** to address the Major Non-conformance. Progress in implementing this policy will be reviewed in subsequent surveillance audits.

Issue	Progress	Next Step	Expected Completion	Status
Rutting	<ul style="list-style-type: none">Rutting policy finalized	<ul style="list-style-type: none">Finalize Rutting policy	1/31/2013	Drafts done

FMU Response:

See Roads Maintenance (revised) document.

Opportunities for Improvement

In 2011 fourteen opportunities for improvement were also identified, and most of these were resolved. Four opportunities for improvement were identified in the 2012 audit:

- There is an opportunity to improve in the western region by providing descriptions of annual harvest trends in relation to the sustainable forest management plan in a publicly available manner, and to include the PSF in the eastern region's Silvicultural Summary. (Indicator 1.1.2 requires "Documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document past and future activities.")
- There is an opportunity to improve implementation of the management plans in the western region regarding forest health and the treatment of overstocked stands. (Indicator 2.4.2 requires "Management to promote

healthy and productive forest conditions to minimize susceptibility to damaging agents.”)

- There is an opportunity to improve the implementation of the full range of issues that are normally covered by BMPs, particularly those related to road maintenance. (Indicator 3.1.1 requires “Program to implement state or provincial best management practices during all phases of management activities.”)
- There is an opportunity to improve the system for assessing training needs and the documentation of training for contractors charged with forest management duties. (Indicator 16.1.4 requires “Contractor education and training sufficient to their roles and responsibilities.”)