

**SCS FOREST MANAGEMENT CERTIFICATION SERVICES  
DRAFT CORRECTIVE ACTION REQUEST (CAR) / OBSERVATION (OBS) MD DNR  
Forest Service 2011 Expansion Audit (5/5/11)**

V1-2

<b>Certificate holder/applicant</b>	<b>Maryland Forest Service</b>
CAR/OBS identified by (SCS representative)	Dave Wager, Mike Ferrucci, Ann Marie Kittredge
Date of Issuance	05/26/11
Audit Year/Type (select from pull down menu)	Surveillance Audit Expansion (2 <sup>nd</sup> annual audit)

DRAFT

TO BE COMPLETED BY SCS REPRESENTATIVE	<b>CAR/OBS Number (e.g. 1, 2, ...)</b>	<b>2011.1</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 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 FM STD; Indicator 1.5.b
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence)		
<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. In other words, additional actions to curtail unauthorized activity are necessary to demonstrate conformance with this FSC requirement.</p> <p>Evidence:</p> <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 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.</li> </ul>		
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation)		
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.		
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>CAR 2011.2</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 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 FM STD; 4.5.b.; FSC-STD-20-001 V3-0, 22
	<b>NON-CONFORMITY</b> <i>(or Background/ Justification in the case of Observations)</i> <i>(Describe and provide objective evidence)</i> 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 <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>		
	Evidence: <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> <i>(or Observation)</i> 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 <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>			
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;"><b>2011.3</b></span>	
	<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 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 FM STD; 5.3.b
<b>NON-CONFORMITY</b> <i>(or Background/ Justification in the case of Observations)</i> <i>(Describe and provide objective evidence)</i> Audit team observed occurrences where harvest practices were not effectively managed to minimize soil compaction, rutting, and erosion. 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>(or Observation)</i> DNR must implement measures to ensure that harvest practices are effectively managed to minimize soil compaction, rutting and erosion.		
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;"><b>2011.4</b></span>	
	<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 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 FM STD; 6.5.d
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence)		
<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>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> (or Observation)		

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)

*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>2011.5</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 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 FM STD; 5.6.d;
	<b>NON-CONFORMITY</b> <i>(or Background/ Justification in the case of Observations)</i> <i>(Describe and provide objective evidence)</i> 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. Evidence: <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>(or Observation)</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.	
<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>2011.6</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 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>		6.1.b
	<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence) 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.  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. We observed two instances where Heritage staff claimed that a completed harvest was not how they had understood it was going to be done based on the ID review. We also learned of instances where forestry was unclear on what non-timber resources Heritage wanted to manage for. The very brief silvicultural description and the lack of documentation about potential impacts contributed to these misunderstandings. Evidence: -Interviews with DNR staff -Review of work plans 2009-2011 Savage River State Forest - Interview with Forest Advisory Committee members		
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation) 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.			
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>2011.7</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 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>		6.1.d
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence) 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. Evidence: <ul style="list-style-type: none"> <li>- Chapter 5 of the SFMP has not yet undergone a public review process</li> </ul>			
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation) 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.			
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>2011.8</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 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>		6.3.f
<b>NON-CONFORMITY</b>			
<p>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:</p> <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> <p>Evidence:</p> <p>-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.</p>			
<b>REQUESTED CORRECTIVE ACTION (or Observation)</b>			
<p>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:</p> <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> <p>Trees selected for <b>retention</b> are generally representative of the dominant species found on the site.</p>			
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>2011.9</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 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>		6.3.h
	<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence)		
	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> <p>Evidence:</p> <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> (or Observation)			
DNR must assess the risk of, prioritize, and, as warranted, develop and implement 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>			

<i>Press Enter twice below table to leave a space, then copy and paste table below for each CAR/OBS</i>

<b>TO BE COMPLETED BY SCS REPRESENTATIVE</b>	<b>CAR/OBS Number</b> (e.g. 1, 2, ...)	<b>CAR 2011.10</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)	East and West
	<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>	6.4.a
	<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence) 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).  Evidence: - 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> (or Observation) 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> .	
<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>CAR 2011.11</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 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>	7.1.b
	<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) <i>(Describe and provide objective evidence)</i> <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>	
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation) <p>DNR must ensure that management plans</p> <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</li> </ul>		

Indicator 6.5.e).

- Describe and justify the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.
- Describe invasive species conditions, applicable management objectives, and how they will be controlled.

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>2011.12</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
	<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>	8.2.d.1
	<b>NON-CONFORMITY</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.  Evidence: <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 (or Observation)</b>  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.	
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>2011.13</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 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>		8.2.d.2
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence) 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.			
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation) DNR must implement a monitoring program to assess the condition and environmental impacts of the forest-road system.			
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>2011.14</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)		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>		9.2.b
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence) 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. Evidence: <ul style="list-style-type: none"> <li>- As of May 1, 2011- HCVF designations, which are part of the SFMP, have not undergone a public review.</li> </ul>			
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation) 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.			
<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>2011.15</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)		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): Western Lands- Prior to the sale of certified wood; East Region 3 months.		
	<b>Standard and Requirement Reference</b>		8.3.a
	<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) <i>(Describe and provide objective evidence)</i> 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. Note: 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 Pure") and the correct COC number.		
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation) 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.			
<i>Press Enter twice below table to leave a space, then copy and paste table below for each CAR/OBS</i>			



<b>TO BE COMPLETED BY SCS REPRESENTATIVE</b>	<b>CAR/OBS Number</b> (e.g. 1, 2, ...)	<b>OBS 2011.1</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>Site CAR/OBS issued to</b> (where more than one site)	West 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 type="checkbox"/> Other deadline (specify): _____	
	<b>Standard and Requirement Reference</b>	4.4.a.
<p><b>Background/Justification</b></p> <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, 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>		
<p><b>OBSERVATION</b></p> <p>DNR should better 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>		
<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>OBS 2011.2</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 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 type="checkbox"/> Other deadline (specify): _____		
	<b>Standard and Requirement Reference</b>		4.4.d
<b>BACKGROUND/JUSTIFICATION</b>			
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 (or Observation)</b>			
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;			
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>OBS 2011.3</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
	<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 type="checkbox"/> Other deadline (specify): _____		
	<b>Standard and Requirement Reference</b>		
<b>NON-CONFORMITY</b> (or Background/ Justification in the case of Observations) (Describe and provide objective evidence) 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: Timber sale contracts do not cover requirements for hazardous spill containment and clean up.			
<b>REQUESTED CORRECTIVE ACTION</b> (or Observation) DNR, and employees and contractors, should take additional steps to ensure that they have the equipment and training necessary to respond to hazardous spills.			
<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>Obs 2011.4</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 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 type="checkbox"/> Other deadline (specify): _____		
	<b>Standard and Requirement Reference</b>		7.3.a
<b>BACKGROUND/JUSTIFICATION</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 FSC standard.</p>			
<b>OBSERVATION</b>			
<p>DNR should take additional steps to ensure workers are qualified to properly implement the management plan, particularly the management plan revisions necessary for full FSC conformance.</p>			
<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 (e.g. 1, 2, ...)</b>		<b>Obs 2011.5</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 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 type="checkbox"/> Other deadline (specify): _____		
	<b>Standard and Requirement Reference</b>		FSC US FM STD; 6.2.d.
<b>NON-CONFORMITY</b> <i>(or Background/ Justification in the case of Observations)</i> <i>(Describe and provide objective evidence)</i> Ginseng is an S3 species that is being actively harvested and no conservation zones or protected areas have been established on MD State Forests. Evidence: <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>(or Observation)</i> DNR should set harvesting levels, conservation zones, and or protection areas (Indicator 6.2.d) for NTFPs that will avoid a depletion of their growing stocks or other adverse effects to the forest ecosystem.			
<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>CAR 2010.1</b>
	<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation		
	<b>FMU CAR/OBS issued to</b> (when more than one FMU)	East	
	<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>		
<b>REQUESTED CORRECTIVE ACTION</b> <i>(or Observation)</i>			
<p><b>CAR 2010.1</b> The Forest Service must investigate and report on the circumstances surrounding the failure to notify the Heritage Program of controlled burn activities, assess whether such failure was due to a systematic break-down in communication, and develop - as warranted - procedures for ensuring full compliance with ESA management protocols.</p>			
<b>IMPLEMENTED CORRECTIVE ACTION</b> <i>(Response to Observations is optional)</i>			
<p>Describe action taken by the FME to address the root cause of the non-conformity</p> <p>A 4-step policy was created to address this non-conformance. This communication issue has been addressed by the request and the receiving of a procedure list from the Natural Heritage Restoration Ecologist. Also, the MD DNR Forest Service has revised the Operation Order for Prescribed Fire (Operation Order 2010-204). The section Ecologically Significant Areas (ESA) states:</p> <p>“Prescribed Burns conducted for ESA management on state lands require a written objective provided by the WHS State Restoration Ecologist. The State Restoration Ecologist then must review and approve the Prescribed Burn Plan before submission to the Fire Manager.”</p>			

<b>TO BE COMPLETED BY FME</b>	EVIDENCE OF CONFORMANCE SUBMITTED WITH THIS FORM <i>(please list)</i>	
	-Operation Order for Prescribed Fire (Operation Order 2010-204)	
<b>TO BE COMPLETED BY FME</b>	FME Representative Name and Title	
	Jack Purdue	
<b>SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION</b>	Based on review of the Operation Order for Prescribed Fire, an interview with Heritage Ecologist (Wesley Knapp), and interview with several DNR foresters.	
	Date May 04, 2011	
<b>TO BE COMPLETED BY SCS REPRESENTATIVE</b>	<input checked="" type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED TO MAJOR <input type="checkbox"/> OTHER DECISION (refer to description above)	
	SCS Representative Name and Title (CAR/OBS reviewer)	
<b>TO BE COMPLETED BY SCS REPRESENTATIVE</b>	SCS Representative Name and Title (CAR/OBS reviewer)	Date of Acceptance of Corrective Action