

First Consultation Report on Supplementary FSC certification requirements for National Forests - Draft 1.0

This document provides information based on the first consultation of the supplementary FSC certification requirements for National Forests. The consultation period ran from February 23 to April 22, 2016. It includes:

- An analysis of the number and range of stakeholders who participated in the process
- A summary of the key issues raised in the comments
- A compilation of all comments received and how the working group considered and addressed them.

1. Number and range of stakeholders who participated in the process

Nine stakeholders submitted written comments as part of the first public consultation.

- Four stakeholders represented economic interests
- Three stakeholders represented social interests
- Two stakeholders represented environmental interests
- One stakeholder was a Certification Body

See Appendix 1 for a full list of stakeholders who submitted comments.

Additionally, comments provided during the webinar and through personal communications with individual stakeholders were considered. The US Forest Service also reviewed the documents and provided comments on whether or how the proposed requirements could be applied.

2. Summary of key issues raised and how they were addressed

General and over-arching -

- Eliminate redundancies - there is no need to add a requirement if it is already adequately addressed in the existing Standard.
- Do not develop any new requirements - the existing standard is rigorous, comprehensive and applicable to the full range of management issues and considerations found on National Forests.
- FSC cannot mandate management objectives to the Forest Service. US citizens and policy-makers are responsible for deciding Forest Service objectives, and not the FSC.
- Do not allow certification until resource extraction is used exclusively as a byproduct of restoration.
- The Standard does not prevent existing requirements that go beyond FSC requirement from being eliminated, and it may also have the effect of discouraging the Forest Service from going beyond what is required by FSC. The FSC Standard does not do enough to ensure public values are conserved and restored. Certification will be used by the Forest Service as a shield against judicial oversight.

Principles 1: Commitment to FSC and Legality Compliance -

- The existing Forest Service legal framework is inadequate and National Forests should be managing for fully functioning ecosystems.
- The dispute process is already covered in the Standard and also detailed in federal law. Anything else will interfere with existing legal processes.
- Ecological and social elements should not be the only focus of the supplementary requirements. The Forest Service also needs to be economically responsible and foster positive relationships with organizations that have an economic focus - jobs and revenue for local, rural communities, etc.
- Additional requirements related to managing for illegal and unauthorized activities are not needed and place unique burden on the Forest Service.
- The 'long-term commitment' to FSC should be from the Chief of the Forest Service specifically.

Principle 2: Tenure and Use Rights and Responsibilities -

- There is no need for requirements related to 'resolving disputes of substantial magnitude' - the US legal system already has procedures in place. Further, the proposed requirement is hard to understand and interpret.

Principle 3: Indigenous Peoples Rights -

- Additional requirements related to tribal consultation (for example, the way in which tribal consultation works, and the training for National Forest staff) are redundant with existing requirements. Eliminate redundancies and streamline whatever is still needed.

Principle 4: Community Relations and Worker Rights -

- The definition of 'workers' should be limited to direct employees of the Forest Service and should not extend to employees or subcontractors of agreement holders.
- Local employment opportunities are already covered in the existing Standard; non-local workers should also be given opportunities, especially if they are equally qualified.
- Specifying that consultation include 'any' interested stakeholder is unrealistic and overly burdensome. The existing indicators sufficiently cover stakeholder consultation requirements.

Principle 5: Benefits From the Forest -

- FSC requirements and objectives are interfering with or contradicting federally mandated objectives. FSC cannot mandate or legislate management objectives that should be set forth by Congress.
- Management objectives and goals should not solely focus on ecological and social objectives. Management oriented towards meeting economic objectives is not inherently inconsistent with responsible forestry. There needs to be a balance and a reflection of the multiple use and public values mandate of the Forest Service.
- Requirements and language about how FSC certification does not mandate timber harvest is unnecessary and biased and contradicts Congressional direction for National Forests.
- Requirements for tracking carbon stock must be rigorous.
- Requirements to track carbon stocks are not necessary.
- Support the addition to implement innovative mechanisms for financing core management activities, such as stewardship.
- Support the addition of requirements to diversify local economy (restoration, recreation, ecosystem services, etc.).

Principle 6: Environmental Impact -

- Requirements related to landscape-level conservation and restoration analysis/implementation are either already covered in the Standard or are unrealistic and overly burdensome. Unclear what is meant by this type of analysis or the size/scale of 'landscape'.
- Even-age harvest should be discouraged and the Forest Service should mimic natural processes.
- Additional requirements related to old growth protection are not needed, since they are already covered in the existing Standard.
- RSA requirements should follow what is allowed on all other FSC certified lands - if it is already adequately protected on other lands then it doesn't need to be designated on the FMU. This changes the entire concept of RSAs, and it also creates an incentive for other certified landowners to not establish RSA networks on their own lands because it will be covered on USFS lands.
- FSC certification should require aggressive efforts towards reducing road densities and road/stream crossings.
- Resource extraction should be limited to that which provides net benefits to the general public.
- The Forest Service uses commercial logging to pay for restoration. When restoration is compromised in order to pay for it, that work should be funded without resource extraction.

Principles 7 and 8: Management Planning and Monitoring -

- Eliminate redundancies related to management plan summaries, umbrella documents and making documents public.
- Great that monitoring will include effectiveness of restoration methods.
- Great additions to socio-economic monitoring.

Principle 9: High Conservation Values -

- HCVs should be defined to include all unroaded areas greater than 1,000 acres.
- The designation of HCV areas should be based on an HCV assessment. The condition of being "roadless" although unique may not correlate with the HCV2 definition.
- Treatment in old growth stands should be limited to non-commercial methods that provide net benefits to the full suite of values associated with old growth stands.
- Support public comment on the HCV assessment methodology.
- Support coordination with adjacent landowners on HCVs.

Principle 10: Plantation Management -

- Requirements related to restoration are already covered in the existing Standard and not necessary to repeat.

Auditing procedures -

- It is not necessary to restate any of the requirements that already exist in the accreditation standard,
- It is unclear why there are additional requirements related to the audit team, public notice, etc. These are not necessary
- The pre-assessment findings should not be made public.
- It is not necessary to require ASI visits.

3. Compilation of all comments received and working group responses

Section	Comment	Recommended change	Sector	FSC US Observations
General comments				
General	<p>We have been involved with FSC forest certification standards development since the beginnings of FSC in the Lake States. And we have held forest management/chain of custody certificates since 2004 (currently three certificates with about 6.5 million acres of public and private lands). Since the establishment of the national forest reserves, Congress has continued to define the purposes of the national forests. The National Forest Management Act and planning rule has resulted in a rigorous and thorough forest planning process. We have also found the current FSC US standard to be very rigorous, comprehensive and applicable to the full range of scale and intensity of forest management in the United States. In our opinion necessary additions to the FSC US standard are minimal.</p> <p>FSC US should also consider the applicability to the full range of federal lands including USFS national forests in Alaska and BLM lands. The federal planning structure and underlying laws are the same (Alaska) or similar (BLM). The FSC US standards are applicable across the range and intensity of forest management found across federal agencies.</p>	Minimize the addition of supplementary requirements specific to US national forests because the current standard addresses the full range of scale and intensity of forest management and protection.	SOC	<p>The aim is to limit the number of additional requirements to those which are necessary, and the WG has gone through this draft to eliminate redundancies, integrate supplementary requirements into existing indicators where possible, and focus on elements where National Forests because of their size and mandate are unique and merit additional requirements.</p> <p>Following the consensus-based FSC US Federal Lands Policy, this process does need to happen.</p> <p>And following the policy as well as the scope of the standard itself, this project must be specific to National Forests, and Alaska is outside the scope.</p>
General	We are concerned that certification of public land will discourage continuous progress toward conservation goals. Once minimum FSC standards are met, the Forest Service will not be encouraged to do better.	Do not adopt FSC certification of Forest Service lands at least until resource extraction is viewed by the agency exclusively as a by-product of restoration	ENV	There are multiple requirements in the standard that strengthen conservation goals
General	We are concerned that the new standard does not prevent the FS from eliminating current conservation requirements that may go beyond the minimum FSC requirements. The FS has twice tried to eliminate the "survey and manage" requirements of the Northwest Forest Plan, which are intended to keep wildlife off of the ESA list, before they	Do not adopt FSC certification of Forest Service lands at least until resource extraction is viewed by the agency exclusively as a by-product of restoration	ENV	The USFS must continue to follow all existing requirements, and through certification these will be third-party verified.

	become threatened or endangered. We are concerned that the FS In Region 6 will eliminate the 21" diameter limit of the Eastside Screens and shrink riparian reserves (based on redefining the role of riparian reserves to eliminate their expected contribution to conservation of terrestrial (not just aquatic) species.			
General	We are concerned that policy makers in Congress and the administration will be discouraged from adopting requirements to do better.	Do not adopt FSC certification of Forest Service lands at least until Congress adopts laws and budgets reflecting the need for ecological restoration as the dominant mandate for public lands and resource extraction is viewed exclusively as a by-product of restoration	ENV	Certification could better enable Congress to adopt laws and budgets that reflect the need for ecological restoration.
General	We are concerned that FSC certification will be used by the Forest Service as a shield against judicial oversight. Lawyers make their case by telling stories. Once a forest is FSC certified, DOJ attorneys will build a misleading narrative that FSC certification indicates "all is well" in the forest, so they should not be held accountable.		ENV	Similar to other public lands, certification of USFS lands does not change judicial oversight or accountability.
General	For the past 11 years, over 1.64 million acres of the Wisconsin County Forests System have been certified to the FSC US Forest Stewardship Standard. Thorough reviews conducted by trained third party auditors over that time period has illustrated the exceptional management being conducted by county forest administrators and staff working in cooperation with Wisconsin Department of Natural Resources liaisons on these properties. We feel strongly that any forests, including Federal forests, should be managed and evaluated on the same standards, or not at all. While we acknowledge differences do exist between management scenarios of Federal, State and County forests, these differences in goals and objectives are more properly illustrated in approved management plans for each entity rather than in differing certification standards. FSC standards require approved management plans for all forests that identify long-term property objectives and the means of achieving them. The National Forest Management Act requires extensive planning and public involvement resulting in plans that differ in some aspects to those of other entities but all these plans and the implementation of such must be evaluated under the same standards. Doing the contrary and providing a revised standard for only Federal forests, would only dilute the value of certification to the remainder of FSC certified forests.	No supplementary requirements to certification standards for Federal forests are necessary.	ECON	The consensus decision to require supplementary requirements for USFS lands has already been made and described in the Federal Lands Policy. The commentator's recommendation is outside the scope of this revision.
General	The overview statement that accompanied the request for comments stated that the reason FSC has not permitted	All forests in North America should be evaluated under the same certification	ECON	The consensus decision to require supplementary

	<p>certification of National Forests to date was that stakeholders recognized that the FSC-US forest management standard <i>“was not designed to capture all of the unique aspects of National Forests”</i>. The same could be said about each individual forested tract across the country. Each of the individual county forest members of the Wisconsin County Forests Association has unique aspects that differ from its sister counties and provide challenges when developing and implementing management plans. Despite these differences, each forest can still be evaluated under the existing standards fairly and accurately. Considering the Federal forests across the United States, we strongly believe that the majority of the proposed supplementary requirements are unnecessary and do little to somehow separate them from the “rest of the pack”.</p>	standards including the Federal forests		<p>requirements for USFS lands has already been made and described in the Federal Lands Policy. The commentator’s recommendation is outside the scope of this revision.</p>
General	<p>In general, we believe there should be no specific indicators for the United States Forest Service (USFS) or other federal lands. Any requirements for any specific public lands should be required for all public lands. The special circumstances of the USFS lands (cross boundary ownership, size, landscape level impact, multiple use requirements, stakeholder interest) can already be handled with the current standard. The scale, risk, and intensity of forest management activities is already built into the standard.</p> <p>If requirements are needed for USFS they should be addressed to all federal lands and not just the USFS. SOC understands the potential complexity of requirements for all federal lands. Starting with the USFS is not necessarily the easiest but is the most applicable for the FSC standard. The accompanying documentation should stress that USFS has requested the indicator development process begin and other federal agencies can do the same. FSC could also stress that developing full indicators for all federal lands will be the long-term goal (if that is an actual goal). Although not the intent, it appears the USFS is being singled out by FSC-US.</p> <p>There are also several instances where the indicators give explicit management objectives to the USFS (e.g. Principle 5 Guidance, C5.1 USFS Intent, C5.5 Intent). The intent of FSC should not be to give or drive management objectives to the USFS. The citizens and policy makers of the United States decide the objectives of the USFS. The standard should determine the boundaries for what constitutes a well-managed forest and not require specific member’s management objectives even if that member is the USFS. Although the SOC disagrees with the overall intent of the indicators, we will provide comments to allow the best</p>		SOC	<p>See above regarding the scope of the project.</p> <p>The backgrounder document that was included in this consultation describes how and why these indicators are being developed. Outside this project, FSC US is in discussions and open to other federal agencies coming forward as ‘willing landowner’</p> <p>It is not the intent of FSC US to dictate management objectives. FSC establishes management requirements for FSC certification. It’s clear that FSC can’t dictate what happens on national forests. It is the charge of FSC US to establish conditions for FSC certification and these supplementary requirements (and the</p>

	outcome for well-managed forests on USFS property.			existing ones in the standard) regarding management goals are not outside of those boundaries. The WG has made revisions to the draft to better reflect this intent.
Multiple places in the standard				
Multiple	The formatting is also not consistent with the typical FSC standard document. All intent and guidance statements should be inside boxes or tables. Individuals unfamiliar with the certification standard will confuse guidance and intent statements with indicators.	Guidance for Indicator 1.6.a, 1.6.b, 2.3.1, C4.1, 4.1.3, 6.3.1, 6.4.b, and 9.3.c should be formatted in boxes so they are not confused for indicators. Intent Notes C5.5, C5.6, and 6.1.2 should be formatted in boxes so they are not confused for indicators.	SOC	OK – the next draft will be reformatted to eliminate any confusion over what is an indicator, guidance, intent, etc.
Multiple	Supplemental material should state that several indicators are taken from the International Generic Indicators. While the SOC disagrees with several of these IGIs almost all of them will soon be required for all membership types including private lands.	USFS Indicator 1.5.1, 1.5.2, 2.3.b, 2.3.1, Guidance C4.1, Supplement to Indicator 4.1.a, Supplement to Indicator 4.1.b, 5.5.1, 5.5.2, Supplement to Indicator 7.1.j, USFS Supplement to Indicator 8.2.d.3,	SOC	OK – the next draft will include references to the IGIs. FYI, these are not necessarily required for all membership types and the standards revision process will address their uptake.
Background				
Scope	National Forests with significant “non-forested” acres should be able to “excise” those areas from their certificate in order to manage costs, etc. similar to the process followed by other large public landowners.	Add a note to clarify this point	ENV	Excision is a separate issue than the scope of the ‘FMU’ and is covered under a separate policy that is not part of the scope of this process. The WG proposes to keep this section as-is, with the minimum area of certification at the forest level.
Applicability	“must be considered” is vague and is not clear that these are required elements	Change “must be considered” to “shall be” or “are required”	CB	OK – the next draft will include this revision
Applicability	A commitment from the forest service Chief at a national level to pursue certification is sufficient. We don’t require separate commitments from the various levels of state forest managers.	In order for a National Forest to undergo an audit in pursuit of certification, there must be a commitment by the Forest Service (e.g. the Chief of the FOREST SERVICE) to adhere to the FSC Principles and Criteria. Further, the	ECON	OK – the next draft will include this revision. Requiring multiple levels of the USFS to sign a commitment form would add unnecessary burden

		Forest Service agrees to pursue certification through a qualified certification body that will follow the FOREST SERVICE-adapted protocols for conformity assessments.		without additional benefit or rigor.
Scope and Applicability	We support the intent of limiting scope of certification to only the FMU and also limiting the scope of calculations of sustained yield to only the areas that will be actively managed forests. Without these allowances US forestland would be unable to seek certification because of costs and complexity.	Keep clear wording on intent directly in standard and auditing requirements.	ECON	Thank you!
Definitions				
Def	This definition duplicates the existing definition of <i>forest workers (workers)</i> in the current US Standard.	Delete the reference to an additional <i>Workers</i> definition in its entirety. Retain the clarification that the <i>forest workers (workers)</i> definition does not include permittees under Terminology (Appendix H)	ECON	OK – the next draft will include this revision. Redundancies to the existing definition will be deleted, and additional clarity on who is not considered a worker will be added (ex: personal use permittees).
Def	In a U.S. context, ENV believes the “workers” definitions and subsequent requirements end with direct employees. Clarification is needed to confirm that this does not extend to the employees or subcontractors of agreement holders (e.g., Stewardship Agreements, etc.).	Add “employees of agreement holders” after “permittees” in the note.	ENV	The definition of workers is intended to extend beyond direct employees. Particularly with a heavy reliance on contractors, subcontractors, and other third-party entities performing management activities on the National Forest, it is important that the standard covers their actions and extends health, safety and other requirements to them. See comment above regarding revisions to the definition of workers.
Def	There is already a definition of workers in the standard. It is not clear how this is different. Does this replace the other one? There has been confusing with the current definition and whether it includes folks that are not technically	Clarify this definition and explain how it is different than the current definition. Consider making this guidance in areas of the standard that talk about workers	CB	OK – the next draft will include this revision. See comments above for further observations.

	contractors (timber purchasers). This definition does not provide clarity on this issue too.	rather than including a new definition.		
Principle 1				
General	We are concerned that the existing legal framework is inadequate. We should be managing for fully functional ecosystems. The Endangered Species Act and NFMA fail to do enough to keep species off of the list of threatened & endangered species. There is no legal mandate to store carbon on National Forest in order to limit the effects of global climate change and ocean acidification. The existing legal framework fails to protect ecosystems after they have experienced natural disturbance such as fire, wind, and insects. The existing legal framework tolerates high road densities and high levels of vegetation disturbance that are inconsistent with conservation of public values such as clean water and resilient stream ecosystems. The FSC certification standards do not do enough to ensure that public values are conserved and restored.		Env	The standard and supplementary requirements aim to address all these issues, and in a topical context and not a legal one.
Ind 1.1.a guidance	Written like an Intent statement. Also, should include the name of the document or website in case link is changed	Change to Intent or change wording to say "This document needs to be considered" if going to keep as Guidance. Add name of website or document the link goes to.	CB	It seems more appropriate as guidance and not intent and the next draft will keep this as-is. The next draft will include the name and more context on what the link goes to.
Ind 1.1.a guidance	We support the notion that the existence of lawsuits or other disputes does not constitute non-conformance to the FSC standard.	Combine the two guidance statements into one reference.	ECON	Both guidance notes refer to different elements; however, the second one regarding disputes is more applicable to USFS Indicator 1.1.1 and will be moved to there.
Ind 1.1.a guidance	This is about disputes specifically and doesn't seem directly related to 1.1.a. but more directly to the new Indicator 1.1.1	Move this guidance to 1.1.1	CB	OK – the next draft will include this revision
USFS Ind1.1.1	Not necessary: This is an indicator that is already addressed in indicator 1.1.a. All applicable laws already require disputes and legal challenges to be identified. The dispute process are also already detailed in federal laws. This also is referenced in the guidance of C2.3 since the dispute process is required to be in the management plan.	Delete or modify into guidance statement	SOC	USFS Ind 1.1.1 provides more detail than what is expressed in Indicator 1.1.a and is important to verify (even if covered by law, which is the case for many requirements). Edits have been

				provided for clarity and in order to not interfere with existing legal processes.
USFS Ind 1.1.1	Last sentence. It is unclear if the “information on the processes” is referring to the general dispute process or related to specific disputes.	Add “existing” before disputes	CB	OK – the next draft will include this revision
Ind 1.2.a guidance	This USFS specific guidance does not add meaning to the existing US standards guidance. The examples named are not inclusive and are subject to change. The existing US standards guidance is sufficient.	Delete the USFS Guidance for Indicator 1.2.a	ECON	The guidance provides helpful examples to both the USFS and the auditor on how to evaluate conformance.
Ind 1.5.b	It is not appropriate to focus solely on the ecological and social elements, thus leaving out the economic sector. It is just as important that the Forest Service foster positive relationships and communication with those organizations who may have a stronger economic focus ... as those are often the organizations who are ultimately responsible for implementing work on the National Forests. Active forest management, along with non- traditional forest products from National Forests, provides vital jobs and revenue for local, rural communities and this is as real and important of a benefit as the essential social and ecological benefits that National Forests also provide.	Add a reference to organizations that promote economically-responsible management from both a resource and vibrant rural community standpoint.	Env	OK – the next draft will include this revision
Ind 1.5.b guidance	These are examples and should be considered Intent, not guidance	Change to Intent	CB	These are not examples of intent but rather of guidance on how to demonstrate conformance. The next draft will keep this as-is
Ind 1.5.b guidance	This USFS specific guidance does not add meaning to the existing US standards guidance. The examples given are not unique to the Forest Service and the existing US standards guidance is sufficient.	Delete the USFS Guidance for Indicator 1.5.b	ECON	It is specific to USFS in the sense that they have their own law enforcement capacity, and the other elements are also helpful. The next draft will keep this as-is; further, an applicability note will be added to Indicator 1.5.a to clarify that National Forests are expected to play a law enforcement role (differing from the existing applicability

				note)
USFS Ind 1.5.1 and 1.5.2	These are very similar and should be combined into 1.	Forest Service has developed and implemented a procedure to assess illegal and unauthorized activities, including documentation and reporting, on the FMU and demonstrates awareness of these activities and its impacts on the FMU.	CB	OK – the next draft will include this revision, and additional rewording so that the indicator is performance-based
USFS Ind 1.5.2	Why is this unique burden placed upon the USFS as compared to other public forests? We suggest that Indicator 1.5.1 is sufficient.	Delete USFS Indicator 1.5.2	ECON	It seems appropriate to add this requirement given the federal ownership and also the significant problems that exist related to illegal and unauthorized activities – issues that FSC certification should address. The next draft will keep these requirements yet integrate into USFS Indicator 1.5.1
Ind 1.6.a guidance	Not necessary: This specific guidance is not provided for large industrial ownerships, for example CEOs of timber companies are not specifically required to sign the long-term commitment, specific personnel and positions should not be identified within the standard	Delete	SOC	OK – the next draft will include this revision and require that the commitment comes specifically from the Chief of the USFS.
Ind 1.6.a guidance	See eligibility comment above. A commitment from the forest service Chief (or higher e.g. Undersecretary of Agriculture) is sufficient and this statement doesn't need to be repeated throughout the standard.	Delete the USFS Guidance for Indicator 1.6.a.	ECON	See comment above
Ind 1.6.b guidance	Support		SOC	Thank you! However, the guidance was incorrectly placed in the first draft (see below), though the requirement is still found in the introductory section.
Ind 1.6.b guidance	The statement of the minimum unit for certification was made previously, so this is duplicative. It can confuse the intent of Indicator 1.6.b, that being where some non-forest uses that are part of the certified FMU may be excluded from the certificate with justification. An example is a ski area lease that is being managed for a non-forest use.	Delete the USFS Guidance for Indicator 1.6.b.	ECON	This indicator speaks to the certification (or lack therefor) of multiple FMUs, and not of how areas within one FMU are certified (or excised). The proposed guidance

				was therefore not well-placed and eliminated in this draft. Excision is a separate issue that is covered in a separate policy and outside the scope of this process.
Principle 2				
P2 guidance (also C2.3)	Since by definition all parts of the US standard apply to all FSC certified FMUs, then this simple guidance statement does not add meaning as this is not unique to USFS national forests.	Delete USFS Guidance: See also Criterion 2.3	ECON	Reference unclear.
P2 guidance	Existing indicators adequately address this. Both parties should be encouraged to resolve disputes and work towards mutual resolution / benefit. This could provide a “disincentive” for disputants to want to work towards resolution.	Rely on existing indicators or find a better balance that allows for operations to occur under certain conditions (e.g., emergency response, public safety, etc.)	ENV	Reference unclear.
USFS Ind 2.3.1	The substance of this USFS indicator is sufficiently addressed by the existing US Standard 2.3.a and 2.3.b. The existing standard recognizes that the legal system is the framework for resolving ‘substantial’ disputes. A court or other administrative order will cause an operation to cease to protect a disputant’s interests.	Delete USFS Indicator 2.3.1.	ECON	OK – indicator and corresponding guidance will be deleted in next draft. In the US context, there exists legal resources and there are legal procedures for addressing this issue. Operations cease as a result of a court order and creating a certification requirement would not allow for this more appropriate, legal process to be followed. Further, this requirement could be misused and/or misunderstood, with too much room for interpretation.
USFS Ind 2.3.1 guidance	This definition of substantial dispute could have a detrimental effect if a party to a dispute worked to elevate their dispute to meet the definition of ‘substantial’ by causing physical violence, destruction of property, or acts of intimidation against forest workers and stakeholders, etc.	Delete USFS Guidance for USFS Indicator 2.3.1.	ECON	See above
USFS Ind 2.3.1 guidance	There is a lot of room for interpretation on this. More guidance or resources would be helpful to ensure consistent implementation	Add more guidance to make it more auditable	CB	See above
Principle 3				

General	In the current standard, there is confusion on the definition of Indigenous peoples and how to audit this. For example, does this only mean recognized tribes (federal or state) or all?	Add guidance for this related to USFS to ensure consistent application of standard.	CB	The current definition in the standard seems pretty clear this refers to recognized tribes. The next draft will keep the definition as-this comment will be considered as part of the larger FSC US standards revision process.
Criterion 3.2 Guidance	References guidance in Criterion 2.3. But there is no Criterion 2.3 Guidance. Even if there was, the language should be repeated here.	Add missing guidance.	CB	Guidance note was a typo and has been deleted.
Ind 3.2.a guidance	First two statements are redundant with rest of criterion and indicators. Last sentence is relevant and we support.	Delete entire sentence except: Pertinent staff members are trained on tribal consultation methods and the importance of building relationships.	SOC	OK – redundant elements of the guidance have been deleted, and the remainder has been moved as a supplement to the existing indicator 3.2.a in order to build off those existing requirements.
Ind 3.2.a guidance	We question whether this is unique to the USFS. The existing guidance states that “Consultation entails active, culturally-appropriate outreach to tribes or designated tribal representatives.” The additional requirement for staff training is covered under P4 that staff are qualified and trained for their role.	Delete USFS Guidance for Indicator 3.2.a because the USFS circumstance is not unique compared to other public lands and the existing indicators and guidance are sufficient.	ECON	See above
Ind 3.2.a guidance	Too much vagueness and room for different interpretations with the “should” in the Indicator.	Change should to shall	CB	OK – revision will be made in next draft
USFS Ind 3.2.1	Support, should be requirement of all public forests		SOC	Thanks! Requirement will be maintained, though integrated as a supplement to existing indicator 3.2.a since it builds off those requirements.
USFS Ind 3.2.1	Not clear what “demonstrated interest” means and what tribes this applies to (only ones that have resources on the FMU, presumably)	Add Intent statement like the one for 3.2.b.	CB	See above
USFS Ind 3.2.1	The existing indicators for C3.2 sufficiently cover federal lands. The need for relationship and consultation is not unique to federal lands.	Delete USFS Indicator 3.2.1 because it is sufficiently addressed by existing standards.	ECON	The existing indicators do not require procedures. This needs to be maintained, though

				integrated as a supplement to the existing indicator 3.2.a rather than as a new, unique indicator.
Principle 4				
general	Similar comment as that above related to “Addendum H – Definition of “Workers.” Clarification that these requirements do not extend to the employees or subcontractors of agreement holders would be helpful and appropriate from a legal context. Seems a bit redundant also with existing indicators.	Clarifying the interpretation of “Workers” as the definition applies to Forest Service activities/lands will probably address this concern. See above comment/suggestion.	ENV	The intent is that these do apply to all workers because intent is performance/impacts on-the-ground and not just performance from USFS employees.
C4.1 guidance	See comment about forest workers. Need clarification on who is covered.	Add guidance	CB	The revision provided in the definitions section will (hopefully) address this issue. In any case, guidance was deleted because it was inaccurately placed under C4.1
C4.1 guidance	This statement duplicates language that exists or is proposed for C4.2. Since this statement is primarily about health and safety it is misplaced (it belongs with C4.2) and is addressed under C4.2.	Delete USFS Guidance for C4.1	ECON	OK – next draft includes this revision.
C4.1 guidance; Ind 4.1.a and 4.1.b	Unclear what “to the extent that they are covered under legal contracts” means. And how it impacts evaluation of these Indicators. It is not clear who is covered by this and the importance of the ‘legal contact’	Move this language to an Intent statement and provide additional clarification; maybe this clarification be used to re-define “workers”	CB	Definition and revisions made in 4.1.a and 4.1.b in order to clarify these points.
Ind 4.1.a,	This statement restates the definition of <i>forest worker</i> and can be simplified because restating the definition is not necessary.	This requirement extends to all forest workers to the extent they are covered under the Forest Service legal contract.	ECON	OK – next draft aims to provide a clearer definition of worker and of the requirements
Ind 4.1.b	This statement restates the definition of forest worker and can be simplified because restating the definition is not necessary.	This requirement extends to all forest workers to the extent they are covered under the Forest Service legal contract.	ECON	OK – See above
USFS Ind 4.1.1	4.1.1: Redundant with the intent of existing indicator 4.1.e (“provides work opportunities to qualified local applicants ...”). Providing opportunities for local workers to bid on contracts, etc. is very important, so long as those local workers meet appropriate qualifications. Non-local workers should still be given opportunities as well, especially if they are equally qualified, etc.	Either delete or tweak the language to read: “Opportunities exist for qualified local workers to bid on contracts ...”	ENV	This is not redundant though it does overlap and builds off existing indicator 4.1.e. The next draft deletes USFS Indicator 4.1.1 as a new, unique requirement and instead has it supplement existing

				indicator 4.1.e
USFS Ind 4.1.1	Not necessary: Repeats 5.2.c	Delete	SOC	See above
USFS Ind 4.1.2	Not necessary: Repeats the criterion (C4.1), indicators cannot be repetition of the criterion and must be measurable and auditable	Delete	SOC	See above
USFS Ind 4.1.2	"given" the opportunity is passive. Is this something they are required to do or something they should do, if available. Need stronger language.	Change to "provided"	CB	OK – and see above
USFS Ind 4.1.3	Not necessary: Could be moved to criterion 7.3 as a supplemental indicator or guidance statement	Add to guidance of Indicator or intent of 7.3.a	SOC	The unique element of the indicator, training, has been kept, as the rest is included in Indicator 4.1.e. This is now USFS Indicator 4.1.1
USFS Ind 4.1.3	Why is this role unique to the USFS? The substance of this requirement is addressed by existing Indicators 4.1.f and 4.1.g	Delete Indicator 4.1.3 because it is sufficiently addressed by existing standards.	ECON	See above. The Forest Service plays an important role in providing opportunities to the local workforce as well as helping to train those workers.
USFS Ind 4.1.3 guidance	Seems out of place. Does this guidance refer to training provided by Universities? Does the indicator reference the USFS should work with Universities to determine the best available science or coordinate research projects?	Further clarification needed	SOC	See above. Language has been clarified
USFS Ind 4.1.3 Guidance	Seems like this in clarification/intent rather than guidance	Change to intent	CB	The guidance has been incorporated into the indicator language
USFS Ind 4.2.1	Not necessary: Indicator 1.1.a already would require the USFS to follow all relevant laws including the MSPA	Delete, consider adding to the guidance for Indicator 1.1.a	SOC	It seems that it is necessary to meet the intent of C4.2. Recommend to keep
USFS Ind 4.2.1	This statement seems misplaced since it addresses monitoring and legal compliance for migrant workers, but is placed under a section regarding 'qualified service providers' and safe implementation.	Not sure where this should go. It seems that it is legal compliance, but doesn't fit well under P1; perhaps it should be added to the guidance under 8.1.a.	ECON	This does not fall under 'qualified service providers...' as that is a separate indicator and this is a newly proposed indicator.
Ind 4.4.d guidance	Already addressed in Indicator 4.4.b, 4.4.c, and 4.4.d. Certainly public review and input is important and required. ENV believes that what is sufficient for other certified public lands, including large state-administered lands, is also sufficient for Forest Service lands. That is, the focus should be on providing <i>"public notification sufficient to allow</i>	Remove/Delete Guidance language. Not realistic / appropriate / auditable.	ENV	Since these are national forests (with national stakeholders), it seems appropriate and important to clarify, as guidance, that

	<p><i>interested stakeholders the chance ... for public review and/or comment...</i>” is appropriate and sufficient. (Ind. 4.4.d.2)</p> <p>Adding the requirement and placing the onus on the National Forest to know what entities are interested and consult ANY interested stakeholder in any geographic area relative to the FMU is unrealistic, overly burdensome, and will likely slow down management to the point that treatments will not be timely or effective in responding to forest health and restoration needs.</p> <p>This is unrealistic and will likely be impossible to implement and audit. Is it the responsibility of “interested stakeholders” to clearly express their interest to the Forest Service in some formal fashion? If not, how can the Forest Service be expected to have knowledge of all entities that may be interested, especially those who are not located in proximity to the FMU? Furthermore, how would an auditor have knowledge from which to evaluate conformance?</p>			<p>stakeholders are not limited to the local area.</p> <p>Revisions made to eliminate points of concern and confusion without changing intent or objective.</p>
Ind 4.4.d guidance	Regarding the statement of “any entity that is known to have an interest”. It is not clear how an auditor is to evaluate the “known” portion of this language.	Additional guidance is needed	CB	See above
USFS Ind 4.4.1	Support, should be required for all public forests, example of indicator potentially singling out USFS from other public agencies		SOC	Thanks!
	<p>We are concerned that the existing legal framework is inadequate. We should be managing for fully functional ecosystems. The Endangered Species Act and NFMA fail to do enough to keep species off of the list of threatened & endangered species. There is no legal mandate to store carbon on National Forest in order to limit the effects of global climate change and ocean acidification. The existing legal framework fails to protect ecosystems after they have experienced natural disturbance such as fire, wind, and insects. The existing legal framework tolerates high road densities and high levels of vegetation disturbance that are inconsistent with conservation of public values such as clean water and resilient stream ecosystems. The FSC certification standards do not do enough to ensure that public values are conserved and restored.</p>	Require site-specific NEPA analysis.	ENV	<p>Reference not clear.</p> <p>The purpose of certification is to go beyond the existing legal framework and to address the points raised by the commentator, as is the aim of this draft.</p>
USFS Ind 4.4.2	Support, should be required for all public forests, example of indicator potentially singling out USFS from other public agencies		SOC	Thanks and anything else is beyond the scope of this project.
Principle 5				
General	Verbiage used throughout the proposed supplementary requirements works hard to prove that management on	Any supplementary requirements that alter management objectives and goals	ECON	It is unclear how the requirements in the

	National Forests must be significantly different than management on any other forests in North America. Rather than allowing individual forests to go through individual planning processes to determine what is most suitable and desirable in their areas, these requirements may actually hinder local planning processes to take place in order for Federal forests to meet FSC Standard. We contend the management of Wisconsin County Forests does focus on ecological and social objectives that includes the yield of forest products and are done “not simply to generate timber revenues” and our past certification audit results have clearly shown that.	of Federal forests to focus on ecological and social objectives are not needed.		standard may hinder local planning processes. Revisions made in the next draft to better reflect the mandate of the USFS and also that FSC certification does not prescribe what the mandate should be.
General	ENV believes that responsible management, especially on public lands, must take into account ecological and social objectives at a landscape and sometimes site-specific scale. However, ENV disagrees with statements suggesting that management which is oriented towards meeting economic objectives is inherently inconsistent with responsible forestry. Principle 5 is about recognizing and supporting the economic factors and considerations that forest landowners deal with in the real world. On other certified properties, Principle 5 helps provide a balance and validates that economic factors are real and often valid objectives that must be considered when making management decisions. A balance between economic, social, and ecological objectives must be incorporated into the supplemental Forest Service requirements, especially throughout Principle 5 (Benefits from the Forest).	Rethink the additional language so as to ensure there is an adequate balance between economic, social, and ecological objectives / considerations, consistent with the interpretation for other public lands.	ENV	OK – revisions made that better reflect the multiple use and public values mandate of the USFS
General	We are concerned that FSC certification normalizes resource extraction that is not in the public interest. Logging, grazing, and mining are always part of the mix of values, even though the negative social costs of resource extraction almost always vastly outweigh any direct economic benefits. For instance, the social cost of GHG emissions from logging are many times greater than the value of timber sales. FSC certification will give an impression that “balance” has been reached, when in reality, the costs of resource extraction are greater than the benefits, and even though the benefits of conserving public values remain vastly under-appreciated in the FS planning process.	Resource extraction should be limited to that which provides net benefits to the general public.	ENV	Resource extraction is not a requirement of FSC certification (in some parts of the world, there are national parks/protected areas that are FSC certified). Guidance language clearly states that management is for the national public interest.
General	We are concerned that leaving “residues” after logging is not enough to ensure provision of public values. Commercial logging does not mimic natural processes because it removes the largest and most ecologically valuable woody material.	Require retention of natural levels of snags and large dead wood. Require retention of adequate green trees to ensure recruitment of natural levels of large snags over time (both the short-	ENV	These were considered in Criterion 6.3 and Criterion 6.5 and it is believed to be effectively addressed.

		term and long-term).		
General	We are concerned that the FS uses commercial logging to pay for restoration. Our public forests were severely degraded by past mismanagement and great wealth was extracted from these forests. The FS now has an obligation to restore the public values that were degraded (e.g., clean water, watershed integrity, habitat, and carbon storage) and should not be sacrificing those same public values (e.g., clean water, watershed integrity, habitat, and carbon storage) in order to pay for restoration. Logging and roads are the cause of a lot of our current problems. Even well-intentioned logging and roads have adverse impacts that are unavoidable. They should not be favoured as restoration tools.	Where restoration outcomes would be compromised by resource extraction (e.g., building roads and/or removing commercial sized trees that would otherwise contribute to habitat values, including dead trees), the FS should be required to fund that work without resource extraction.	ENV	This was considered in Principle 5 and Criterion 6.3 and Criterion 6.5 and it is believed to be effectively addressed.
P5 Guidance	The purpose of National Forests is set forth by Congress in the National Forest Management Act and subsequent and related laws. It is inappropriate for a forest certification standard to create an overall lens of achieving ecological and social objectives as this is the purpose of NFMA and the forest planning process. The Forest Service must consider all three objectives as stated in NFMA. It also conflicts with the FSC as a principled organization that holds the balance of ecological, economic and social objectives in high regard, so much so, that it forms the three chamber balanced system of governance. The balanced consideration of ecological, economic and social factors is also an underpinning of most definitions of sustainable forestry.	For National Forests, the Forest Service manages for a diversity of products, ecosystem services, and social benefits for the broader public interest. Management objectives and goals, including the yield of conventional forest products, represent the consideration of ecological, economic and social objectives.	ECON	The suggested text is sound and consistent with the FSC US Federal Lands Policy. Recommend to revise P-level guidance with aim of ameliorating this concern while keeping it aligned with Fedlands Policy (consideration of the avoidance of “primacy of timber” element.)
P5 Guidance	Provides management objectives for the USFS, no other group member including other public members are given specific management directives from the FSC standard	Delete	SOC	The intent was not to provide management objectives but rather to state which management objectives are consistent with FSC goals and requirements for certification. Revisions were made to more clearly articulate this.
C5.1 intent	The fundamental orientation of National Forests is set forth in the NFMA and related laws. However some National Forests may have a unique opportunity to address large-scale ecological and social objectives. The National Forests, in the west in particular, have enormous impact on local economies as well.	National Forest management has a unique opportunity to meet large-scale ecological, economic and social objectives.	ECON	See above
C5.1 Intent	Provides management objectives for the USFS, no other	Delete	SOC	See above

	group member including other public members are given specific management directives from the FSC standard			
Ind 5.1.a	Supplement to Indicator 5.1.a: Ideally this would be realistic and appropriate, however it may not be possible in every case in any given year. Perhaps look at trends in funding vs. each specific annual allocation?	Focus on trends and budget decisions that are within the control of a Forest Supervisor on a National Forest.	ENV	The intent of the supplementary indicator is kept as-is; however, redundancies with the existing indicator were deleted.
Ind 5.1.a	Not necessary: First part of statement is covered in Principle 7 when developing management plan objectives. The second portion related to securing funding is generally out of the USFS' control. Original Indicator 5.1.a is sufficient to ensure USFS can implement their stated management objectives.	Delete	SOC	The purpose of this supplementary indicator is, in part, to recognize budget needs and considerations. See above
Ind 5.1.a	This should be documented. Examples should be moved to Intent or guidance and not part of the Indicator since they will be hard to audit...unless it was a full list. Would be best to know what parts of standard is important for USFS so a cross reference to other Indicators or Criterion would be good.	Add "and documents" after "defines"; move examples to intent and add cross reference to other parts of the standard	CB	OK – the next draft will include the addition of 'documents'; however, the examples seem to work fine in the indicator rather than as an intent statement.
Ind 5.1.b guidance	Guidance to Indicator 5.1.b: Very appropriate to recognize that budget constraints and fluctuations in the appropriations process are valid short-term financial factors. ENV supports this added text. Is it truly the intent, however, to suggest that market fluctuations can not be factored into management decisions? This is unrealistic and frankly counter-productive to the goal of restoration and conservation. Granted, market fluctuations should not be the only consideration, but market fluctuations will impact management decisions and the funds available to support various activities / programs.	Delete "rather than markets" text. Add "also" into text so it reads: <i>"Budget constraints and other fluctuations in the appropriations process, rather than markets, may also be considered short-term financial factors."</i>	ENV	OK – revision made to next draft
Ind 5.1.b guidance	Support		SOC	Thanks!
C5.1.a & b	We support the additional language that holds the Forest Service accountable to funding management implementation at appropriate levels.	Support the additional indicators and guidance	ECON	Thanks!
USFS Ind 5.1.1	Very appropriate and an excellent addition given the scope/scale of the Stewardship Contracting Authorities and other unique partnership efforts/tools.	Keep as is	ENV	Thanks!
USFS Ind 5.1.1	What if innovative mechanisms aren't needed...does this need to be required. Maybe this is better as guidance.	Move to guidance	CB	Seems more appropriate as an indicator, so will be kept as-is in next draft

C5.2 Intent	Not necessary, covered in C5.4 guidance statements that already address all public forest		SOC	Given the existing overlap with C5.2 and C5.4, it should also be stated in C5.2 since the current 5.2 has a 'should' statement and not a 'shall' statement
C5.2 Intent	Doesn't read like an Intent statement. If this is required, which sounds like it is, it should be a new Indicator...we don't audit Criteria.	Make new Indicator	CB	It is meant to clarify that the "should" is a "shall". It was revised to be an applicability note.
Ind 5.2.c guidance	Very appropriate and an excellent addition given the scope/scale of the Stewardship Contracting Authorities, the potential offered by Good Neighbor Authority, CFLR, and other unique partnership efforts/tools.	Keep as is	ENV	Thanks!
C5.4 Applicability	Not necessary, repeats requirements for all public forests in guidance for indicator 5.4.b	Delete	SOC	OK – next draft deletes the applicability because it is already covered in the indicators and is an awkward sentence and does not fit under C5.4 anyway.
C5.4 Applicability	Applicability note needs to be included in each area that it applies. There is no applicability note in 5.4.b.	Add this Applicability Note to all relevant areas	CB	See above
Ind 5.4.a	Support		SOC	Thanks!
Ind 5.4.a,	The substance of this supplemental language should be linked to the implementation of sustainable forestry.	The Forest Service, in collaboration with local communities and other experts, conducts an assessment of opportunities to contribute to the diversification of the local economy through the implementation of sustainable forestry, including but not limited to,....	ECON	This would limit the scope of implementation, which goes beyond forestry. The next draft maintains this requirement, though with minor edits to be more performance-based.
Ind 5.4.a	We strongly support "The Forest Service, in collaboration with local communities and other experts, conducts an assessment of opportunities to contribute to the diversification of the local economy, including but not limited to, restoration, recreation, ecosystem services and other new markets."	Keep this.	ENV	Thanks!
Ind 5.4.b	Support		SOC	Thanks!
Ind 5.4.b	Is this related to a federal mandate? How is this applied on other public land?	Delete USFS Supplement to Indicator 5.4.b because it is sufficiently addressed	ECON	This indicator requires the implementation

		by the existing standards.		element that builds off the previous indicator and is important to maintain. Slight revisions made so that focus is on performance and not on mandate.
Ind 5.4.b	Rather than include a partial list and vague language here, clarify this is implementation of Indicator 5.4.a. Applicability note is missing.	Change language to: "Forest Service implements opportunities identified Indicator 5.4.a). Add the Applicability Note	CB	OK – revisions made to the next draft.
C5.5 Intent	Provides management objectives for the USFS, no other group member including other public members are given specific management directives from the FSC standard	Delete	SOC	OK – intent note was deleted because it is already covered more effectively in the indicators and without framing it as FSC defining USFS objectives.
C5.5 Intent	It is inappropriate to state that the provision of 'these forest services' is recognized as <i>the [emphasis added]</i> overarching objective of forest management since this is a narrow statement related to watershed and fisheries resources. Is there a statute that is being referenced?	The provision of these forest services is recognized as an important objective of forest management on the National Forest. Or delete this statement.	ECON	See above
C5.5 Intent	See comments above re: Principle 5 & associated indicators, etc. The existing Criterion and interpretation is adequate for other public lands as well as Forest Service lands. Requiring that in every case operations have this overarching objective is not necessary so long as operations "recognize, maintain, and where appropriate enhance" such values (current language).	Delete – not realistic or appropriate Provides no balance or room for economic or social objectives.	ENV	See above.
C5.5. Intent	Since focus is on auditing of Indicators, the Intent would be better at the Indicator level	Move to Indicator 5.5.a	CB	See above
USFS Ind 5.5.1	"Best available" as determined by who and using what criteria? Will cost factors and ease-of-use factors be acceptable considerations during the decision process?	Clarify that "best available" can be evaluated, in part, based on cost and practical factors.	ENV	<i>Best Available Information</i> is defined in the standard. It includes practical factors. That aside, the indicator has been revised to focus on desired outcome rather than on process.
USFS Ind 5.5.1	The requirement for tracking carbon stocks must be more rigorous. Forest conservation is a critically important climate strategy. FSC must not certify forests that are part of the	First, during project level decision-making, the FS must accurately inform the public and the decision-maker about	ENV	Revisions made to both USFS Indicators 5.5.1 and 5.5.2 were made in

	<p>climate problem. It is not enough to manage our National Forest for an increase in carbon storage over time. Our National Forest must be managed to take full advantage of their carbon storage potential. Maintaining carbon storage (and avoiding carbon emissions) in the near-term is critical.</p>	<p>the effects of projects on carbon storage, carbon emissions, and the social cost of carbon emissions.</p> <p>Second, the FS must accurately account for the climate consequences or the time lag between logging-related carbon emissions and later forest regrowth. There are real climate consequences from the carbon debt caused by logging. The FS must recognize the climate effects of near-term emissions are not justified by forest regrowth in the distant future. Climate impacts caused by near-term emissions are real and cannot be discounted. The global economy will likely be decarbonized over time, so the benefits of future forest regrowth must be discounted.</p> <p>Third, the FS must accurately disclose the nature of the climate crisis as one of cumulative effects from actions that are globally distributed. All emissions are part of the problem. None can be considered inconsequential. The FS must not minimize the significance of carbon emissions caused by logging.</p> <p>Fourth, the FS must compare the carbon and climate consequences of logging by comparing the action and no action alternatives over time, not by comparing effects before and after forest regrowth. The FS must compare the climate effects of forest management to the forests maximum potential for carbon storage (given natural fire regimes). The FS must not make any claims that forest growth across the landscape justifies carbon emissions from commercial logging for economic reasons.</p> <p>Fifth, the FS must not dismiss the significance of logging related carbon emissions by relying on “substitution” effects. Consideration of the benefits of wood products in comparison to alternative products, must use realistic</p>		<p>consideration of these comments.</p>
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		estimates of the substitution effect (not rely on theoretical maximum), and must account for alternatives that are better than wood, not just those that are worse than wood. Sarah L. Shafer, Mark E. Harmon, Ronald P. Neilson, Rupert Seidl, Brad St. Clair, Andrew Yost 2011. Oregon Climate Assessment Report (OCAR) http://occri.net/ocar Chapter 5. The Potential Effects of Climate Change on Oregon's Vegetation. http://occri.net/wp-content/uploads/2011/04/chapter5ocar.pdf		
USFS Ind 5.5.2	Who defines "historic levels" and using what data? Consideration must also be given to economic considerations when looking to restore carbon stocks to historic levels.	Needs additional clarification and thought for what is practical and attainable.	ENV	Revisions made based on these comments
USFS Ind 5.5.1 & 5.5.2	Are these necessary? Do they add value to the process given the amount of investment and resources needed? Are they needed to demonstrate sustainable forest management? I did not see any stakeholder comments about this in the draft documents.	Remove	CB	See above
C5.6 Intent	This statement is the prime example of the USFS being singled out. It goes without saying that FSC certification does not mandate timber management. This statement seems to be specifically in place to satisfy concerns that the USFS is going to use FSC certification as a 'cover' to increase timber harvesting. These concerns may or may not be justified but it is unnecessary for the FSC standard.	Delete	SOC	Revisions were made to better express intent, which is to make it clear that certification does not mandate the harvest of forest products. Economic objectives was also added
C5.6 Intent	Language can be clarified	Change to: "Forest management is a tool to achieve larger scale environmental and social objectives/services on the National Forest not to simply generate..."	CB	See above
C5.6 Intent	Entire intent statement is unnecessary and biased. First part (" <i>Certification does not mandate commercial timber harvest.</i> ") is completely biased and unhelpful in that it contradicts Congressional direction for National Forests. Furthermore, Indicator language should focus on what is required, not what isn't. Technically, certification does not "mandate" anything because that is beyond the role/authority of a voluntary certification standard. Depending on circumstances and site/stand conditions, generating revenue from commercial timber management for the intended purpose of funding the broader ecological and	Delete	ENV	See above

	social objectives/services either, within that same stand or elsewhere on the National Forest, is a valid and important management consideration/rationale. Generating “retained receipts” to fund future restoration treatments and “service work” on the National Forest is one of the purposes and benefits of Stewardship Contracting in fact, particularly the use of Integrated Resource Timber Contracts.			
C5.6 Intent	While forest certification may not mandate commercial timber harvest, a National Forest plan may include commercial harvest and as such certification should assess the implementation of the forest plan. The intent of certification to assure the ongoing ecological basis of long-term forest operations is already well stated in the existing standards e.g. the current Intent statement under 5.6.a., current Indicator 6.1.c.	Delete this statement.	ECON	See above
Ind 5.6.a	Concern: If FSC supports this requirement it should be for all public forests and not just the USFS	Delete or modify for all public forests	SOC	Other forests are beyond the scope of this revision and it seems important to include for USFS. FSC US will consider other public forests in the broader, upcoming standard revision process.
Ind 5.6.a	This is unnecessary as this issue is already addressed in the current Indicator 5.6.a where it says: “areas reserved from harvest or subject to harvest restrictions to meet other management goals”.	Remove this. Leave the Intent regarding this issue.	CB	OK – revised so that the supplementary indicator is not redundant with existing indicator.
Ind 5.6.a intent	This is restatement of the USFS Supplement to the Indicator 5.6.a and the current Intent Statement under 5.6.a.	Delete this statement.	ECON	See above
Ind 5.6.a intent	Would this require a more formal “designation” than what is in existing Forest plans? USFS already designates Wilderness Areas etc. and outlines “management areas” in Forest plans. If this is sufficient, then this is OK. If this would require more formal designation, ENV has concerns that the designation process will result in additional management delays, disputes, costs, and ultimately less acreage available for active forest management. At a time when early-successional and young forest habitat has decreased, commercial and non-commercial forest management is the best tool for maintaining/restoring habitat for many wildlife species, including the wild turkey.	Delete. Existing indicators are sufficient and consistent with processes used on other public lands for determining credible sustained yield calculations.	ENV	This does not require more formal designations but rather that harvest calculations are based on the land base designated for harvest. In any case, this is already an existing requirement under Indicator 5.6.a, so the redundancy has been deleted.
Principle 6				
Ind 6.1.a	See previous comment about carbon	Remove	CB	See previous comment

USFS Ind 6.1.1	This is unrealistic and would be quite time-consuming, costly, and subjective. Existing indicators, coupled with NEPA and other existing policies/laws, are sufficient. At a minimum, delete the requirement to assess the cumulative effects on neighboring affected lands.	Delete	ENV	Given the size and mandate of the USFS, it seems important to include requirements related to landscape level conservation and restoration. These indicators do need to be streamlined, however, and revisions were made that integrate 6.1.1 and 6.1.2 into one indicator, plus other revisions. Additional input and technical expertise will be sought during the next consultation to determine whether/how to address these issues
USFS Ind 6.1.1	In general, it is best to include additional requirements that are related to existing Indicators in the current Indicators. Therefore, it is best to put the first part of this (before the “and incorporates”) in Indicator 6.1.b and the part after “and incorporates” into Indicator 6.1.c.	Move this into existing Indicators 6.1.b and 6.1.c.	CB	See above. The comment was considered, though it seemed more appropriate to keep these separate.
USFS Ind 6.1.1	Concern: This should be a guidance statement for Indicator 6.1.d	Move to guidance box of 6.1.d for USFS Intent	SOC	6.1.d is about public consultation and not about the elements of 6.1.1 See above
USFS Ind 6.1.2 and Intent	Components of this are addressed in existing indicators. Other components are unrealistic and would be quite time-consuming, costly, and subjective. How would the potential conservation value of lands comprising the FMU <i>AND</i> surrounding lands within the ecoregion be determined?	Delete	ENV	See above
USFS Indic 6.1.2	Concern: This should be modified as a guidance statement for Indicator 6.4.a	Move to guidance for 6.4.a. Suggested language “USFS Intent: Landscape level analysis includes a restoration analysis.”	SOC	6.1.2 goes beyond 6.4 as not all conservation and restoration is captured in 6.4 (RSAs) See above
USFS Ind 6.1.2	It isn’t clear why this is needed and how it is related to or different from Criterion 6.4.	Add additional guidance.	CB	Conservation and restoration may be very

				broad considerations (e.g. restoring expansive degraded forest conditions) and not aligned with the RSA concept. See above
USFS Ind 6.1.2 Intent	Concern: Intent Statement with existing indicator 6.4.a	Move entire statement to guidance for 6.4.a	SOC	See above
USFS Ind 6.1.3	Concern: This indicator is addressed by other indicators already in the standard. Protected areas, old-growth forests, RTEs, and rare plant communities are already protected under the Representative Sample Areas and High Conservation Value Forests indicators and criteria.	Delete	SOC	See above
USFS Ind 6.1.3	It is not realistic or appropriate to expect that National Forests compensate for an “inadequate” network of protected areas, old-growth, etc. across the broader landscape. The focus should be on what is appropriate in the context of the FMU, not the entire landscape. This may put more pressure on adjacent lands The Forest Service can play a role in providing scientific information/research and encouraging the conservation and management of such values on the broader landscape (already reflected in other indicators).	Delete	ENV	The FSC US FM standard has explicitly recognized the value of public lands in carrying the majority of responsibility for these values.
USFS Ind 6.1.3	See comment above on 6.1.2	Add additional guidance	CB	Unclear what additional guidance is needed.
USFS Ind 6.1.3	This language begs the ‘viability question’; if a landscape is primarily in late-successional or old growth (or other successional stage), then is it viable long-term? The long-term viability of a landscape should take into account all successional stages.	USFS Indicator 6.1.3 When the landscape-level conservation and restoration analysis required in USFS Indicator 6.1.2 indicates that existing protected areas, late-successional and old-growth forests, or other successional stages, and habitat for RTE species or plant community types...	ECON	Unclear what recommended text is.
USFS Ind 6.2.1	Support		SOC	Thanks!
USFS Ind 6.2.1	In general, it is best to include additional requirements that are related to existing Indicators in the current Indicators. Therefore, it is best to put this in 6.2.a.	Move to 6.2.a	CB	OK – indicator will be revised to be a supplement to existing indicator 6.2.a
USFS Ind 6.2.1	This new indicator is partially addressed by current indicator 6.2.a and Guidance for 6.2.a.	Change this to a USFS Supplement to Indicator 6.2.a	ECON	See above
C6.3	We are concerned about even-aged harvest which removes most of the above ground biomass. This does not mimic	Discourage even-aged harvest. Let nature decide where and when stand	ENV	Even aged systems are addressed in Indicator

	natural processes which may in fact kill a lot of trees, but do not remove the majority of the biomass.	replacing disturbance will create new forests. Require the FS to mimic natural processes and retain the majority of the above ground biomass when conducting timber harvest.		6.3.g and also the USFS supplementary requirements, with proposal to require ecologically justified and appropriate systems.
C6.3 Landscape-scale indicators Intent	Concern: Provides management direction to the USFS, not appropriate in a certification standard	Delete	SOC	Intent is not to provide management direction. Revisions made to clarify this.
Landscape-level	We are concerned that “landscape-level conservation” will lead to “splitting the baby.” Landscape-level conservation is often misused to justify resource degradation in one area based on an assumption that other areas will be conserved. But plans change and those “other areas” are often not conserved.	Don’t sacrifice public values by relying on off-site conservation. DO consider the degraded state of non-FS lands and increase conservation requirements to mitigate for degraded conditions on non-FS lands.	ENV	FSC US approach has been to have both site-specific and landscape level requirements for 6.3. See previous comments
Landscape-level	We support the intent of allowing some landscape level indicators to look at the entire area including areas not within active management or FSC certification. The proposed forest manager should be allowed to highlight the management occurring outside the scope of their FSC certified area in response to stakeholder comments.	None	ECON	Thanks!
Ind 6.3.b	Concern: Since USFS is generally the largest landowner in an area their size and scale make the feasibility of the original indicator extremely relevant. New indicator simply repeats the indicator.	Delete or convert to Guidance statement that for the USFS that indicator is expected for large public ownerships.	SOC	OK – revision made so that this is the intent of existing indicator 6.3.b, and redundancies were eliminated.
Ind 6.3.b	This is the exact same language as Indicator 6.3.b	Remove	CB	See above
Ind 6.3.g	Support, should be required for all public forests		SOC	Thanks! The remainder of public forests will be addressed in the standard revision process.
Ind 6.3.g	Additional language would be helpful to make this more auditable.	Add, “as defined in Indicator X.X” after ecological objectives.	CB	It doesn’t seem that this level of guidance is necessary, and there is not one indicator to tie this to.
Ind 6.3.g	Ecologically justified is used twice when once will suffice. Suggest modified language.	USFS Supplement to Indicator 6.3.g When even-aged silviculture systems are employed, such uses contribute to the attainment of ecological objectives. The use of and size and distribution of even-age harvests within the FMU and	ECON	OK – revised to eliminate redundancies

		structural retention within those harvest areas is ecologically justified.		
Ind 6.3.i	Support		SOC	Thanks!
Ind 6.3.i	This is not auditable. Move to Intent.	Move to Intent.	CB	OK – revised to make this an applicability note
USFS Ind 6.3.1	In general, it is best to include additional requirements that are related to existing Indicators in the current Indicators. Therefore, it is best to put this in 6.3.a.3	Move to 6.3.a.3	CB	OK – revised to make this a supplementary requirement to 6.3.a.3 and eliminate redundancies, and also to be more practical on what can be identified
USFS Ind 6.3.1	This language mixes concepts related to late successional stages, addressed in current Indicator 6.3.a.1 and old growth, addressed in current Indicator 6.3.a.3. The old growth language is a restatement of existing Indicator 6.3.a.3 and is not unique to National Forests.	Two suggested changes: 1. Move the language related to identifying late successional stages (stands) to USFS Supplemental Guidance for Indicator 6.3.a.1.; 2. Delete USFS Indicator 6.3.1 as it duplicates existing Indicator 6.3.a.3	ECON	See above
USFS Ind 6.3.1 and guidance	Why the requirement to identify all late-successional stands? Other similar indicators are limited to old-growth stands. Focusing on only one successional stage is one-sided and biases. There are many organizations and scientific studies that point to concerns with the trend of decreasing early-successional habitats and young-forest stands across the landscape. It is impractical and not ecologically justified to require that all old-growth (much less late-successional) stands of all sizes be identified. Existing definitions of old-growth should be maintained and applied to Forest Service lands. Although the Guidance language says that the Type I and Type II old growth definitions remain applicable, the second sentence of the indicator negates that by creating essentially another protection designation with management limitations to stands of all sizes.	Delete the entire indicator & guidance. Already addressed in existing indicators.	ENV	See above
USFS Ind 6.3.1 guidance	Same as Indicator 6.3.1	Move to 6.3.a.3	CB	See above
USFS Ind 6.3.1 guidance	This guidance is a restatement of the existing Indicator 6.3.a.3 and guidance. It doesn't add anything unique to the National Forests.	Delete this Guidance for USFS Indicator 6.3.1	ECON	See above
USFS Ind 6.3.a and guidance	Concern: These repeat existing indicator 6.3.a.e	Delete	SOC	See above
USFS Ind 6.3.2	This new Indicator is closely related to existing Indicator 6.3.a.2	Suggest changing this to a USFS Supplement to Indicator 6.3.a.2	ECON	The requirements are different, as the

				proposed 6.3.2 deals with refugia and not ecologically rare communities. Some revision made to make it more practical to implement
USFS Ind 6.3.2	No definition of “ecological refugia” or “relict areas” was found. Creates additional management restrictions that are not flexible or dynamic to adjust to changing landscapes. Existing indicators adequately address this in a less prescriptive & restrictive way.	Delete	ENV	Refugia is in the glossary. Revised to allow for more flexibility in management.
USFS Ind 6.3.2	Concern: Definitions for ecological refugia and relict areas are not provided in glossary, difficult to determine applicability unless definitions are provided		SOC	See above
Ind 6.4.b	Overly burdensome, inappropriate, and inconsistent. The same approach and interpretation that applies to all other lands should be applied here. The RSA assessment and designation process on other lands allows the land manager to take into account what is already adequately protected across their lands and the broader landscape, what ecosystems are commonly occurring across the landscape without any formal protections, etc. This creates a dynamic that encourages and “all-lands” approach and cross ownership collaboration/cooperation. Changing the interpretation of RSAs is inappropriate, unjustified, and frankly diminishes the credibility of the entire concept. Furthermore, requiring the Forest Service to establish such an extensive network of RSAs will change the assessment results of other certified land managers, thus negating the need for RSAs on other certified lands and weakening the need for landowner coordination. It seems very inconsistent to require the Forest Service to take into account what is or isn’t happening across the landscape in some situations and not in others, especially when it contradicts how a core concept has been interpreted.	Delete	ENV	Seems appropriate in a USFS context (size and mandate) to require this, and indicators left as-is
Ind 6.4.b	Concern: Statement should be in guidance or intent statement. Also, should apply to all federal public lands.		SOC	Unclear why this would be guidance or intent when it is a supplementary requirement. Scope of this project is

				for USFS only.
Ind 6.5.b guidance	Understand the intent, but rethink the specific wording. Layering multiple components on top of each other may not make scientific sense and may actually be contradictory.	Reword or delete	ENV	OK – deleted in next draft as USFS has to follow federal laws
Ind 6.5.c guidance	Biomass harvesting and protection of soil resources may be addressed through state level biomass harvesting guidelines e.g. Wisconsin Biomass Harvesting Guidelines. <u>Suggest adding additional guidance related to biomass harvesting.</u> However FSC does not (or should not) be in the business of establishing operational guidelines or regulations and this reference should be deleted. County or local regulations could result in a patchwork of regulations that is unworkable. <u>Suggest leaving federal or state only.</u>	USFS Guidance: Where federal or state, county, local or FSC's guidelines/regulations differ, the most protective measure for protecting the affected resource is applied.	ECON	Guidance refers to 6.5.b.
C6.5	More attention needs to be given to reducing road density. Roads are a novel feature of modern watersheds that do not really have a natural analog. The FS has a bias toward active management of vegetation (and fire) and they like to keep roads even then they have clear adverse hydrological and ecological impacts.	FSC certification should require a more aggressive effort toward reducing the density of roads and road/stream crossings to optimal levels.	ENV	This was addressed when discussing Indicator 6.5.d and it appears to address concern.
	We are concerned about the lack of attention to livestock grazing.	Where FSC certification is sought for lands that are both logged and grazed, the certification process should prevent adverse effects of livestock grazing on soil, biological crusts, water, wetlands, native plant communities, recreation, and natural fire regimes.	ENV	Existing indicators seem to address this concern
Ind 6.5.d	Who determines the “needs” and what would “exceed the needs” re: access and roads? Reword.	Delete “does not exceed”	ENV	USFS would determine. Unclear why ‘does not exceed’ should be deleted,
Ind 6.5.d	Support, should be required of all federal lands		SOC	Thanks!
Ind 6.5.e.1	Concern: This supplement should be in Principle 8 related to monitoring	Move to Indicators 8.2.d.a and 8.2.d.2 and modify to “USFS Supplement to Indicator 8.2.d.1: Water quality monitoring is expected as a component of the site-disturbing activity assessment.” & “USFS Supplement to Indicator 8.2.d.2: Water quality monitoring is expected as a component of the forest-road assessment.	SOC	While this references monitoring, it also has other implementation aspects that belong here and it might be confusing to break up this indicator and move it to multiple places. For now, it is as-is, though might be moved in the next draft.
Ind 6.5.e.1	Monitoring is not a C6.5 activity. Move to C8.2.	Move to C8.2.	CB	See above
Ind 6.5.f	Concern: Indicator does not note if relevant to temporary or permanent crossings. Should be required for all forests types	Modify to “New crossings (culverts or bridges) installed longer than one year	SOC	OK – revised to make it clear that this refers to

		are sized at a minimum anticipated peak 100 year flows. Existing permanent culverts and other crossings are assessed for their capacity and prioritized for upgrading if they do not meet 100-year peak flow needs.”		permanent crossings.
Principle 7				
Ind 7.1.e	Support, should be required for all federal public lands and consideration given to all public lands		SOC	Great! This will be considered as part of the larger standards revision process.
Ind 7.1.e	The second part of this is about monitoring, not management planning. The “and to assess the effectiveness” should be in C8.2 and not here in C7.1	Delete from here. Add to C8.2 if not already there.	CB	OK – good catch
Ind 7.1.l	Concern: Repeats Supplement to Indicator 6.3.g regarding even-aged management	Delete	SOC	This is related to 6.3.g but asks for a description and rationale so therefore also belongs here.
Ind 7.1.l	I think there is an error. Should reference C6.3, not C5.6.	Edit to correct Criterion.	CB	OK – This is also a 5.6.a issue but correct to also reference 6.3
Ind 7.1.q	This is a restatement of the existing language in the guidance for 7.1.q “For public lands, plans should be made available to the public prior to commencement of significant operations. The land manager should address public comments as part of the process of revising the plans.”	Delete USFS Supplement to Indicator 7.1.q because it duplicates existing guidance.	ECON	OK – deleted because it is redundant with existing 7.1.q guidance for public lands
Ind 7.1.q	Concern: Repeats statement in guidance statement	Delete	SOC	See above
Ind 7.1.q	This is about a process and not content of management plans so should not be C7.1, should be in C7.4	Move to C7.4.	CB	OK – see also above
USFS Ind 7.1.1	Support		SOC	Deleted because it is already a requirement, through the definition of management plan
Ind 7.2.a guidance	Some of the guidance is not specific to USFS and should be removed. Scope of this supplement is USFS only.	Delete everything that is not directly related to USFS (all but last sentence)	CB	Apologies for this confusion – correct that it should not go beyond USFS; however, it was recognized as a problem with the full standard that should have been revised a long time ago. In any case, this will be revised to focus specifically on USFS and will be considered

				for other ownerships as part of the standards revision process.
Principle 8				
General	Reviewed and no changes suggested.		ECON	Great!
Ind 8.2.d.3	Very appropriate addition and recognition of “socio-economic” monitoring aspects that are important to stakeholders. National Forest provide critical public access and recreational opportunities for the public, as well as employment opportunities. This must be recognized and considered.	No change – keep	ENV	Great!
USFS Ind 8.2.1	Support		SOC	Great!
USFS Ind 8.2.1	See comment at Indicator 7.1.e.	Remove reference to 7.1.e from here and delete 7.1.e	CB	OK – revision made
Principle 9				
General	We are concerned that High Conservation Value Forests are not defined to include all lands deserving of protection. There is a growing body of evidence that unroaded areas >1,000 acres are ecologically significant, rare, and need to be conserved.	Conserve all unroaded areas >1,000 acres.	ENV	This needs to be done through the HCV assessment process, which includes public consultation. There is also consultation on the management prescriptions.
General	We are concerned that old growth forests are not adequately protected. The loophole allowing logging “if needed to maintain the values associated with the stand” is much too broad and discretionary. The FS has a huge bias in favour of active management. The FS fails to trust natural processes that help develop and maintain heterogeneous conditions in mature & old-growth forests. The FS views insects, mistletoe, and fire as problems, when they are just natural processes. The cure (logging) is too often worse than the “disease.” The phrase “the values associated with the stand” is too vague. The FS will pick one value that they can arguably enhance through logging and ignore the fact that they are degrading many other values that are equally or more important to the structure, function, and process of old growth forests.	Limit treatment to non-commercial methods that “provide net benefits to the full suite of values associated with old growth stand.”	ENV	See above.
P9 Intent	Concerned with setting an expectation that non-designated roadless areas may merit classification as HCV2. This specific reference is not necessary – requiring the Forest Service to define HCVs applicable to their lands and go thru a credible and holistic HCVF assessment will be sufficient. Management within HCVFs must be compatible with maintaining or enhancing the identified conservation value. It	Tweak language – remove reference to non-designated roadless areas. Delete second paragraph stating that HCV2s are generally off limit to management ... that is more accurately spelled out in other resources related to HCVFs.	ENV	OK – revised in order to better focus on the purpose of this Principle, which is to do the HCV assessment in order to determine HCVs. It is also recognized that

	is fairly common for HCVFs to be actively managed in ways that are compatible with the HCVs (with the exception of old-growth stands and a few other types of HCVFs). The Forest Service requirements go one step further by saying that management can only occur when it is needed to maintain or enhance. This is inconsistent with existing language.			inventoried roadless areas will likely fall in to multiple HCV categories and not always HCV2.
P9 Intent	To ensure consistency, add this Intent to Appendix F.	Add to Appendix F.	CB	For simplicity, recommend to retain at P9 intent.
P9 Intent	The designation of HCV areas should be based on an analysis of conditions against the existing HCV definitions (i.e. HCV 1-6). The condition of being “roadless” although unique may not correlate with the HCV2 definition, “HCV forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.” The assessment of the amount or designation of road-less or wilderness or any other forest use designation is the purview of the laws that govern USFS planning and management. The definition of HCV should not be changed for USFS certification. This thinking applies to the notion of protecting ‘Intact Forest Landscapes’ as well. USFS should consider whether a 3 rd party designation of an Intact Forest Landscape is a value to be protected through the forest planning process, but it should be evaluated along with other values. The definition of HCV should not be changed for USFS certification alone.	Delete this intent statement in its entirety or change to: It is expected that roadless areas (i.e. designated, non-designated or candidate areas) undergo the HCV assessment to determine whether they merit classification as HCV2.	ECON	See previous comment regarding honoring the HCV assessment process. Revisions made accordingly.
USFS Ind 9.1.1	Support, should be required for all public forests	USFS Indicator 9.1.1	SOC	Great! Project scope limited currently to USFS.
Ind 9.3.c guidance	Support, should be required for all public forests		SOC	Great! Project scope limited currently to USFS.
Principle 10				
General	Reviewed and no changes suggested.		ECON	Great!
P10 guidance	This is probably impractical and will increase harvesting pressures on other lands, some of which may not be managed holistically for social and ecological considerations and are almost certainly not going to be FSC-certified (given the lack of FSC-certified lands in the SE U.S.). The larger impact on landscape conservation may be quite negative if all	Delete or tweak to read: “The Forest Service is required to restore all forest stands that would be classified as Plantations in the FSC sense to natural forest conditions as early as possible where practical and where	ENV	Perhaps this is a misunderstanding of the use of the term Plantations in FSC standards?

	<p>plantations on Forest Service lands must be restored to natural conditions.</p> <p>The focus should be on incorporating other objectives into the management of plantations to make plantation management as compatible and supportive of other values as possible, such as wildlife habitat, water resources, recreation and aesthetics, etc.. Existing Indicators are sufficient in this regard.</p> <p>Existing language in the standard even states that “plantations ... should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.” This is appropriate and realistic as is.</p>	doing so will advance landscape- level goals and economic, ecological, and social objectives.		
P10 guidance	Edits to ensure consistent application. Reference should be made to the definition of plantation in the glossary.	Change to: “...classified as Plantations (see Glossary for definition) to natural forest conditions...”	CB	OK – though since this is not a new requirement, it is being deleted in order to eliminate redundancies
P10 guidance	Not necessary: Repeats indicator 10.5.g		SOC	OK – revised accordingly
	We are concerned that accelerated restoration of plantations will encourage overly aggressive thinning that grows big trees faster while sacrificing recruitment of large snags and down wood, which are equally important features of natural forests.	Recognize the trade-offs associated with thinning plantations and require the FS to harmonize restoration of all the structures, functions, and processes associated with natural forests. “Harmonize, don’t maximize.”	ENV	Comment was considered and believed to be appropriately addressed in the standard.

Comments received on Audit procedures

Section	Comment	Recommended change	Name	FSC US Observations
General				
General	Document should only list additional requirements. Several requirements are already mandatory under the established auditing/evaluation standard. It is unnecessary to list these requirements just because the USFS is involved.		SOC	OK – revised accordingly
General	Requirements are lessened when language indicates things are being considered	Remove the “being considered” references	CB	OK – revised accordingly
Overview	Need stronger language that these are required to be following.	First Sentence: change “would” to “shall”.	CB	OK – revised accordingly
1. CB Submission				

Section	Comment	Recommended change	Name	FSC US Observations
1	Support		SOC	Thanks!
1	Isn't it a given that CB's must follow USFS specific standards and auditing protocol? What is the evidence that a CB is 'USFS qualified'?	Since this is guidance for CBs the language might say, "CBs that perform audits or issue certificates for USFS National Forests must follow all supplementary standards and interpretations and supplemental auditing guidance and protocols."	ECON	Yes, that was the intent. Will suggest alternate language to make this clearer.
2. Audit Team				
2	Concern: Already required	Delete	SOC	OK – existing requirements have been eliminated and more specific ones added, such as the specific number of auditors and their composition.
2	Overall the qualifications of auditors or an audit team should mirror other large public forests. We do not believe that USFS forest management is so unique as to require special knowledge of USFS policies, protocols, planning or management. While potentially helpful, a requirement such as this may unnecessarily limit the pool of qualified auditors.		ECON	See above
3. Public Notice				
3	Support		SOC	Thanks!
3	Need more guidance on the purpose of the public notice, which may be slightly different for USFS	Suggest add some detail in a bullet including "request from stakeholders sites to visit"	CB	The purpose seems clear and is stated, though it has been clarified in this next draft
3	Add to this section to clarify formal public notice is required for all audit types	"early in the audit process and for all audit types—pre-assessment, full evaluation and annual audits"	CB	OK – though the draft has been restructured so that this clearer without the suggested language.
4. Pre-assessment				
4	Concern: Pre-assessment findings and summary should not be made public. These assessments are informal and usually are a helpful service to the certification applicants and should not be used to publically demonstrate conformance to the standard. These are irrelevant to getting a final	Delete public pre-assessment report requirement Consider adding statements the observers that they could be restricted from confidential sites as agreed by USFS, FSC, and Certification Body	SOC	This is only asking for a summary of the findings, which is most likely a requirement anyway for USFS lands since they are public.

Section	Comment	Recommended change	Name	FSC US Observations
	certification decision. If FSC and members decide it is necessary for full transparency then all public forests should have this requirement. Support: In-person meeting, potential observers to the field visits			Requirements related to observers has been removed since it is duplicative with existing requirements.
4	Regarding stakeholder consultation in the certification process, we recommend that the existing standards (e.g. 45 day review or comment period) be applied. The existing standards have been used successfully for other large public ownerships (e.g. Wisconsin DNR Lands totalling 1.5 million acres and located across the state). Existing standards should be used until they are shown to be ineffective, rather than adding the time and cost under the assumption of 'USFS uniqueness'		ECON	It seems worthwhile as well as practical to increase the notice. It should not have any additional burden to USFS and will be responsive to the desire for transparency and stakeholder engagement.
4	Survey instrument comment in vague	Add "provided by FSC US" or if you expect CB to develop, include more information about what is required or purpose	CB	OK – revised to provide more clarification
5. Full evaluation				
5	Concern: Stakeholder consultation and assessments are discussed already in pre-assessment, site visits by auditors to areas of concern by stakeholders is a normal part of the FSC process for all forest ownership types and does not need to be repeated, ASI invitation should not be at the discretion of the USFS or FSC, ASI is an independent accreditation body that decides which audits to shadow Certification Body auditors, ASI attendance or even an invitation should be an ASI requirement to the Certification Body and not an FSC requirement	Delete	SOC	Requirements that already exist in the accreditation standard have been deleted. ASI audits have been deleted, also because they can happen anyway and are not necessary to call out or assume that they will be needed.
5	Don't see the value or purpose to having ASI participate in this process; if the process is followed and the documents are public as required, there is already enough transparency	Delete this bullet point	CB	See above. Revision made
5	Last bullet point adds not value as these are already required in system...all types of sites need to be visited in order to evaluate conformance so if this is the approach, all of these types should be listed. Areas identified by stakeholder is also already part of the process.	Remove reference to the site visits to restoration sites. Move reference to sites identified by stakeholders to public notice section (see comment above)	CB	OK – revised accordingly
5	We question whether there is any value added by inviting or requiring participation by ASI		ECON	OK. ASI requirement deleted for reasons

Section	Comment	Recommended change	Name	FSC US Observations
	outside of the normal requirement under existing systems.			stated above.
6. Audit report				
6	Concern: Peer review is already required for public and large forests, peer review comments should not be made public because reviewers need to be able to speak and comment freely and independently, final report is already made public	Delete	SOC	Comments would not be attributed to the peer reviewer
6	It is not clear (at first) that this is related to the full evaluation.	Reorganize so there are 2 sections under full evaluation: "Process" with all the stuff currently under full evaluation and "report" with all the "audit" report stuff	CB	OK – revised for clarity
6	Not clear when it says draft findings and final report are made public if this is the full report or a summary	Add "full" to draft findings and final report to match Indicator 4.4.2	CB	OK – revised for clarity
7. Annual visits				
7	Concern: See comments for Audit Report	Delete	SOC	OK – revised so that it is clear that peer review is not expected during the annual audit
7	First sentence is vague. "generally followed". It needs to be specific what is required. 2 peer reviews seem unnecessary for annual audits	Language should say "annual audits follow the same requirements" if that is the intent or say "except for..." and list the ones that are not required. If peer reviews are deemed important to transparency and credibility than 1 is enough.	CB	OK – revised for clarity
7	Second sentence regarding USFS recommendation to share actions on addressing NCRs should not be included here on this document which is a document for instructions to CBs, not recommendations to USFS.	Remove from this document. If this is important to credibility, add as guidance to Indicator 4.4.2.	CB	Not clear why this should not be included here.
8. ASI witness				
8	Concern: See comments from Pre-assessment	Delete	SOC	OK - deleted
8	See comment above about ASI.	Remove.	CB	OK - deleted

Appendix 1: Stakeholders who submitted comments

Comments submitted by:

1. Federal Forest Resource Coalition
2. Wisconsin County Forest Association
3. National Wild Turkey Federation
4. Center for Forest and Wood Certification
5. Oregon Wild
6. Rainforest Alliance
7. International Paper
8. Wisconsin DNR
9. Tony Cheng, Professor, Colorado State
10. Chris Maser