

Second Consultation Report on Draft 2.0 Supplementary FSC certification requirements for National Forests August 2016

This document provides information based on the second consultation of the supplementary FSC certification requirements for National Forests. The consultation period ran from 3 June to 10 July, 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 and how the working group considered and addressed them in the next, 'forest testing' draft
- A compilation of all comments received and FSC US responses

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

Eleven sets of comments were received as part of the second consultation:

- Three stakeholder comments represented economic interests
- Three stakeholder comments represented social interests
- Three stakeholder comments represented environmental interests [note: one set of comments was submitted by a group of 12 organizations]
- Two stakeholders were Certification Bodies

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

Additionally, comments provided during a conference call with a group of environmental stakeholders, and through personal communications with individual stakeholders were considered. The US Forest Service also reviewed the documents and provided comments on whether on how the proposed requirements could be applied.

2. Summary of key issues raised and how they were addressed in the development of the 'forest testing' draft

General –

- There is no need for additional requirements – National Forests should be audited to the same requirements as expected of state lands (if not private lands).
- The standard as a whole is completely flawed and the bar needs to be higher throughout the standard, and also more prescriptive
- National Forests should not be certified because they will use it to roll-back existing federal requirements, will not follow existing federal requirements, and will use it to greenwash

Working group recommendation: These concerns point to issues that are beyond the scope of this revision process. FSC US is following

the FSC US Board mandate, as referenced in the FSC US Federal Lands Policy, to develop requirements that adapt the national standard to the context of National Forests.

Principles 1: Commitment to FSC and Legality Compliance -

- Existing appeals/lawsuits (USFS 1.1.1) are important indications that management is not compliant with laws and regulations, and auditors need to examine them
- In addition to having processes in place designed to resolve disputes, there needs to be demonstration that objections etc are being resolved such that genuine legal compliance is achieved
- Don't allow USFS to use categorical exclusions
- Require that the current provisions of NFMA, NWFP, NEPA etc are followed even if they are rolled back OR insert prescriptions that are currently in all these regulations into the standard itself.
- Additional requirements regarding unauthorized activities are not necessary, as they are sufficiently covered in the standard.

Working group recommendation: The next draft should emphasize the points raised above regarding the need to review existing appeals, lawsuits and disputes for possible indication of non-compliance, and also that disputes are being resolved according to the existing legal channels. The standard cannot, however, change the congressional mandate of the Forest Service or their ability to use categorical exclusions or to change the process for congressional revision of federal law. The standard sets the benchmark, it does not mandate Forest Service policy. Given existing issues and concerns with illegal and unauthorized activities on National Forests, it is felt that supplementary language is needed to improve National Forest performance on this issue.

Principle 4: Community Relations and Worker Rights -

- Eliminate redundancies
- The Forest Service should inspect that workers/contractors are being paid properly and that health/safety is being followed
- Requirements related to employees cannot realistically be expanded to include all workers given the relationship that the Forest Service has with contractors, subcontractors, etc.

Working group recommendation: Redundancies will be eliminated in the next draft, including supplementary language to include contractors when the existing indicator already included them (for example, Indicator 4.2.b). The supplementary requirement for a public participation strategy is needed given the public mandate of the Forest Service and it is not sufficiently covered in the existing indicator. A focus of the forest testing exercise will be to better understand the role that the Forest Service can have with respect to non-employee workers. The intent is that all health/safety, rights and wage-related issues provided to employees are also extended to workers.

Principle 5: Benefits From the Forest -

- Management must be focused on (science based) ecological conservation and restoration and that active management (timber harvest) is limited to compatible activities (science based restoration projects). Except for legitimate restoration, no logging in regional where old growth or other HCV forests have declined below historic levels.
- Generally, conditions resembling pre-European settlement are an acceptable framework for gauging the efficacy of restoration projects.
- Forest services such as watersheds and fisheries should be the overarching objective of forest management, which is even recognized in NFMA and 2012 NFMA rules

- Requirements for carbon are an excessive burden for USFS and go beyond requirements of the criterion
- Standard fails to adequately address carbon/climate issues
- Concern that USFS is not meeting timber targets. Add that “timber harvest levels should be evaluated for their impact to local communities and businesses especially where the National Forest controls the availability of timber.”
- The intent statement in C5.6 unnecessarily and unfairly singles out the Forest Service.

Working group recommendation: The standard cannot change the mandate of the Forest Service, which allows for active timber harvest, nor can it require that a certain level of timber harvest be reached (there are many reasons why timber levels fluctuate). It does, however, put many safeguards in place to ensure that such management meets its multiple use mandate, including social, ecological and ecosystem service objectives, as highly elaborated in both Principle 5 and Principle 6. Additional requirements related to watershed analysis and management will be included in the next draft, as well as carbon and climate change-related issues.

Principle 6: Environmental Impact -

- Fire requirements need to be revised to: take into account ecologically important and inevitable natural disturbance process for all forest types; require to manage for natural fire regimes, restore forests’ natural resilience to fire, work with local authorities; require that post fire logging is not appropriate for certification.
- Requirements related to successional stages are not adequate: Bring back DoD/DoE indicators; management actions should be implemented to maintain, restore or enhance the extent, quality and viability of all successional stages at risk; successional stages need to be managed to their natural levels of abundance, including as needed for RTE species, water quality, climate, other public values.
- Landscape level requirements are confusing; need to re-work.
- RTE species need to be managed for their recovery across their natural range, including for RTE that are not found on the management unit but that need that habitat to recover.
- Recovery plans need to be sufficient for actual species recovery.
- For old growth: All old growth trees and stands should be identified and protected (not just 1 and 2) and also all late successional stands. There should be no minimum acreage for old growth. Bring back DoD/DoE indicators; No new roads constructed, strict diameter limits and canopy closure requirements, one entry permitted; Require that national forests are managed to maintain existing and restore historical extent for old growth and late successional ecosystems.
- For even age management: limit to restoration and rehabilitation
- For protection of water bodies, add performance-based requirements with explicit buffer widths for RMZ and other prescriptions; Add that management effectively maintains/restores aquatic ecosystems and riparian habitat on forest
- Look at Aquatic Conservation Strategy of PNW region
- Require that grazing be addressed, with its effects on alterations of natural fire regimes, facilitation of invasive species, harm to native species, degradation of water resources
- Get rid of redundancies
- RSA requirements should be the same for National Forests as for private, state forests.

Working group recommendation: Many of these concerns are already addressed in either the standard or the supplementary requirements. Fire-related issues were revised, as well as grazing and road system requirements. The landscape requirements have been reworked for improved structure and readability, and (as stated above), more emphasis has been given to watersheds. The requirement related to old

growth being identified (mapped), as per DoD/DoE indicator was added back to this draft. Language related to even-age management was revised to focus on having ecological rationale, though any further restrictions were considered to be overly limited, particularly given the other ecological safeguards in place.

Principle 9: High Conservation Values -

- All roadless areas, including inventoried and uninventoried, should be automatically considered HCV. [This is done with IFLs, so why can't it be done with roadless areas?]
- The intent statement for IFLs is insufficient and needs a definition.

Working group recommendation: It is important to uphold the intent of the HCV concept within the FSC system which is that HCV analysis must be done in order to determine the HCV values and then manage them accordingly. The supplementary requirements places heightened emphasis on roadless areas. Any reference to IFLs should be removed from the draft because they are not yet in the current FSC US FM standard, and will therefore be integrated into the supplementary requirements (as necessary) once the overall FM standards revision is complete.

3. Compilation of all comments received and FSC US responses

The below table provides the comments received, verbatim, by stakeholders, and how they were addressed in developing the ‘forest testing’ draft. FSC US also engaged three subject matter experts (forestry, ecology, socio-economics) to provide a peer review of the supplementary requirements with the aim of verifying whether stakeholder concerns were addressed in the standard, and also to provide input for the forest testing exercise.

Section	Comment	Recommended change	Sector	FSC US Response
General Comments				
General	While we note that most of our previous comments were considered “outside the scope” of this revision we need to reiterate our concern that any forests, including Federal forests, should be managed and evaluated under the same standards, or not at all. While there are differences in management schemes and legal requirements that exist between entities the vast majority of these should be evaluated under the existing standards that cover all sister forests in a similar region. Doing the contrary and providing	Few supplementary requirements to certification standards for Federal forests are necessary	ECON	We appreciate your perspective, and again, we are following the FSC Board approved Federal Lands Policy which requires additional requirements (where necessary) for FSC certification of National Forests. [See observations from first round of consultation for more details]

	<p>supplementary standards for one entity is unfair to all parties, including the Federal forests who in some cases have to jump higher hurdles to meet the requirements for certification.</p>			
General	<p>We do note that several USFS Supplements to Indicators have been removed in this second draft. We support this trend and as mentioned previously feel strongly that for the most part there should be few if any Supplements needed. Criterion or indicators that apply to laws or regulations specific to Federal Forests that are applicable to FSC standards would be the exception.</p>	<p>Few supplementary requirements to certification standards for Federal forests are necessary</p>	ECON	Thank you
General	<p>The Department appreciates the opportunity to comment and after reviewing the 2nd draft of the proposed FSC US FM standard for the US Forest Service we've noted these changes:</p> <ul style="list-style-type: none"> • 6 proposed indicators plus 8 supplements, guidance or intent statements to existing indicators were deleted from the first draft; redundancies were deleted. • The remaining additions include 11 new indicators and 63 supplements, guidance or intent statements to existing indicators. In many cases language of these additional requirements was modified for clarity and intent. <p>The majority of edits made to the first draft are positive improvements, redundancies deleted, language clarifications, focus on areas of the</p>		ECON	Thank you

	<p>standards unique to National Forests, etc.</p> <p>Among the many other positive changes:</p> <ol style="list-style-type: none"> 1. FSC certification for National Forests recognizes social, environmental <u>and economic</u> [emphasis added] values and benefits. 2. Definition of ‘worker’ is clarified. 3. C1.1 recognition of the ‘supremacy clause’ in federal law. 4. Indicator 1.1.1 clarifies the impact of objections, appeals, and lawsuits on certification conformance (the mere existence does not constitute non-conformance). 5. Principle 5 recognition of diverse benefits including “a diversity of products, ecosystem services, and social benefits for the national public interest.” 6. Indicator 5.4 USFS collaborates with local communities to assess opportunities for economic diversification. 			
General	I am of the opinion that US National Forests should not have a separate standard and should be audited to the US National FSC Standard the same as all other US forests.		ECON	We appreciate your perspective, and again, we are following the FSC Board approved Federal Lands Policy which requires additional requirements (where necessary) for FSC certification of National Forests. [See observations from first round of consultation for more details]

Entire Document	As with first draft we generally believe the attributes of the USFS can be handled with standard already in place. Scale, risk, intensity, and public ownership are already built into the standard. Nonetheless, we will still provide comments where appropriate. The second draft is a marked improvement from the first draft. The reformatting of the USFS guidance and intent statements have made the standard much easier to read. It is obvious that FSC took stakeholder comments in consideration and should be commended for their efforts.	Entire Document	SOC	Thank you
General	We support the general proposition that FSC certification should be applicable to federal lands in the US. FSC's standards cover all the relevant issues, and they have been seen to work all around the world, for all sorts of land ownerships. So we do believe that in principle there should be appropriate rules of applicability to federal lands in the US.		ENV	Thank you
General	We believe that the public trust character of the federal lands requires that there be a higher bar applied to some aspects of the FSC system, but not a wholly different standard.		ENV	Agreed, which is why we are developing these additional requirements.
General	The undersigned organizations are writing to express our concern with the Forest Stewardship Council's plans for certifying the USDA Forest Service's management of our public		ENV	Thank you for sharing your perspective. Specific points raised will be further addressed where they come up below. In addition, it should be recognized that

	<p>National Forests as being environmentally responsible, including as reflected in the FSC's draft standards. Collectively, our organizations represent over 3 million U.S. members and activists and decades of experience in monitoring the Forest Service's approaches to managing our National Forests, and in working for improved management and conservation of these forests. While there are a few positive aspects of note, we mostly find the draft standard for National Forests to be deeply flawed and highly inadequate. The standards are overly vague, insufficiently outcome and performance oriented, and fail to sufficiently address important topics and objectives for these important public lands. The FSC federal lands policy requires standards that acknowledge that these forests need to provide disproportionately large conservation and ecosystem benefits, given their public status and role in regional forest landscapes – including landscapes otherwise dominated by non-federal lands that are generally focused on timber production. Yet the standard's requirements are often not commensurate with our National Forests' needed role in landscape level conservation and ecosystem function nor do they sufficiently protect and restore to historical extent old growth ecosystems, roadless areas, carbon stores, and other crucial public trust resources,</p>		<p>FSC certification, including standards, policies, auditing procedures, etc) have been in existence for 20+ years and have a proven track record of environmental and social credibility. Moreover, the intent of this initiative is not to create an entirely new standard that deviates from the global and consensus-based Principles & Criteria, nor is it to serve as the ultimate and all-encompassing tool to move forest management on National Forests to a level which meets the needs of the stakeholders included in the letter. FSC US cannot change the congressional mandate of the Forest Service. We are working within and must honor a framework and decision-space for these additional requirements.</p>
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	<p>ensure full and genuine compliance with applicable laws or re-orient the Forest Service's overall management towards conservation and restoration. The draft standard is not even as protective of some important values as the prior draft and the FSC's existing standards for federal public lands, specifically FSC standards for forests on DOD and DOE lands. These inadequacies are all the more troubling given the serious problems and threats that remain in many National Forests, and that will not be sufficiently corrected by the standard.</p> <p>The signatories to this letter share a common concern about the negative impact of applying FSC certification to USFS lands. Some of us see no appropriate role for commercial logging on USFS lands. Others view a certification program designed primarily for commercial logging as only perpetuating the imbalance that such logging priorities already hold in USFS management</p> <p>Some of us see a great need for restoration but question whether commercial logging is the appropriate tool for restoration of our public forests. All oppose certification of public lands that does not materially increase protection of their unique value to the public.</p> <p>There is also a serious threat of certification being used as the pretext for short-circuiting vital public participation requirements, notably under the National Environmental</p>			
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	<p>Policy Act (NEPA), which is already under concerted attack. Without an explicit requirement that eligibility for certification hinge on full compliance with the normal, baseline requirements of NEPA and other such procedural protections, irrespective of the availability of congressionally-enacted waivers, further erosion of the public's information about environmental effects and alternatives, and its ability to participate fully and meaningfully in decision-making on affected National Forests, is likely to be restricted.</p> <p>We hope the FSC will take these concerns seriously, and reconsider not only the draft standard, but also its overall approach to certification of the public's cherished National Forests.</p>			
General	<p>Certification of National Forests by the FSC (and other certification schemes) remains inherently problematic. We are concerned that neither the FSC nor its National Forest Standard are likely to be well suited to address problems such as:</p> <ul style="list-style-type: none"> * The risk of future pressure to use external "sustainability" certifications from third parties to justify weakening important procedural and substantive policy requirements for the management of our National Forests. Certification of National Forests by the FSC is also likely to trigger National Forest certification by other schemes like the Sustainable Forestry Initiative, 		ENV	<p>First bullet: There is no evidence to support this assertion. It also points to an issue that is beyond the scope of the FSC standard (or this initiative), as it has more to do with whether stakeholders feel that USFS should be certified than about what the standard should include.</p> <p>Second bullet: FSC has other policies and procedures in place to address greenwashing concern, including the FSC Policy for Association and requirements around trademark use and communications. This comment also has more to do with whether stakeholders feel that USFS should be certified than about what the standard should include. Further, the Federal Lands Policy</p>

	<p>whose standards are much weaker and can be met even more easily by the Forest Service, which will further increase the risk of public policies being weakened or simply not being strengthened as needed, as decision-makers point to the existence of external certifications.</p> <p>* The strong likelihood that “green” certification of one National Forest will serve to “greenwash” unacceptable activities in other National Forests that are not certified. This too is not a hypothetical. Currently, we are seeing serious problems with continued logging of old growth and pristine forests in the Tongass National Forest including the draft revised Tongass Land Management Plan that proposes to continue to log old growth for at least 16 more years, rollbacks of the Northwest Forest Plan, “salvage” logging of sensitive resources in the Klamath, Stanislaus and many other National Forests, and threats to forest ecosystems, roadless areas, biodiversity, and other public values in other National Forests.</p> <p>• The future loss of important regulatory and management plan requirements that underpin recent improvements to some National Forests’ management, <i>and upon which the FSC’s approach to certification of National Forests is likely implicitly predicated</i>—yet which are under threat from various</p>		<p>suggests that certification should take place forest-by-forest, which has also been a direction previously recommended by ENV members.</p> <p>Third bullet: Criterion 1.1 specifically incorporates the resource protection requirements of the existing legal framework and a certification assessment/audits would further include a list of all the requirements.</p> <p>The FSC standard cannot require that laws, policies, regulations, etc. cannot be changed, particularly if they are in line with USFS and congressional due process.</p>
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	<p>quarters. The National Forest Management Act and its provisions for the identification and protection of biodiversity and other values, for example, is being threatened and weakened, as are many of the very ecologically important provisions of the Northwest Forest Plan. The draft FSC standard's failure to fully incorporate and exceed the specific resource protection requirements of the existing legal framework and more conservation oriented management plans for National Forests means that if these existing laws, regulations, and plans are weakened, then the FSC will be certifying National Forest management that is significantly worse than currently occurs. We trust that this is not the FSC's intention, but it is an inevitable risk.</p>			
<p>General</p>	<p>The Draft Standard is flawed and inadequate: Examples of topics and objectives that are essential to the sound management and restoration of our National Forests, and that are not adequately addressed in the draft standard include:</p> <ul style="list-style-type: none"> * Achieving more ecologically oriented management than is currently required of National Forests. * Recognizing that ecological conservation and restoration, guided by the best available science and the precautionary principle, must be the primary management objective for National Forests. 		<p>ENV</p>	<p>Responses will be provided as they are further detailed in comments below.</p>

	<ul style="list-style-type: none"> * Protection and restoration of old growth and late successional forests. * Protection and recovery of endangered and threatened species. * Biodiversity protection and restoration. * Protection of roadless areas and intact forest landscapes. * Aquatic resource protection and restoration. * Carbon sequestration and climate change mitigation. * Limiting logging to science-based restoration projects. * Use of outcome and performance oriented standards and explicit, objective, and ecologically robust management prescriptions. * Ensuring genuine compliance with existing regulations, public participation requirements, and management plans, and providing safeguards against their weakening. 			
General	We also wish to incorporate by reference the comments of Oregon Wild on the 1st draft standard, April 21, 2016. Most of their concerns and recommendations on the 1st draft standard have not been sufficiently		ENV	These were again considered in developing the next draft.

	addressed in the 2nd draft.			
General	<p>We also wish to acknowledge there are some positive and valuable aspects to the draft standard, such as:</p> <ul style="list-style-type: none"> · Definition of the “forest management unit” as being at least at the scale of a National Forest, i.e., recognition that forest units smaller than National Forests should not be certified. · The supplementary auditing procedures that provide more robust auditing requirements for certification assessments. 		ENV	Glad there are two points that you like.
General	<p>The standard as a whole: It is our understanding that the FSC Standard for National Forests is expected to also incorporate and address the requirements of the revised FSC international standards (the FSC Principles & Criteria), including as they are expressed in the FSC International Generic Indicators. This does not appear to have happened at various important junctures. For example, the draft standard does not appear to reflect the revised P&C’s expectation that identification and protection of Representative Sample Areas (e.g. rare ecosystems) be proportionate both to the scale of the forest management unit and to the extent to which ecosystems are protected in the broader landscape. The draft standard also does not provide more specific management thresholds and performance outcomes as called for</p>		ENV	<p>This revision so far has considered the IGIs. Further alignment will take place as the FM standard is aligned to the revised P&C with the IGIs.</p> <p>Per the example, the draft did include language on RSAs that were based on IGIs.</p>

	in the instruction notes of the FSC International Generic Indicators.			
Multiple Places in the Standard				
Entire document	All word that are defined in the glossary should be in bold and italicized for consistency with the FSC-US standard.	Idem	CB	Yes, this will be done prior to finalizing the supplementary requirements.
Stakeholder consultation	The standard as a whole fails to require that stakeholder consultation be conducted nationally, not just locally. The draft standard includes such an expectation in the context of Principle 4 (guidance for indicator 4.4.d), but not in the context of other equally and arguably even more important contexts, e.g., Principle 7, Principle 9, etc. Indicator 9.1.1 is silent on this question, for example.		ENV	The intent is that stakeholder consultation be conducted nationally. The national nature of the stakeholders is addressed in Guidance for Indicators 4.4.d and 7.1.r, and indirectly in Guidance for P5. It will be added to P9 guidance in the next draft.
<i>Stakeholder consultation</i>	Need to have stakeholder consultation conducted nationally not just locally	Stakeholder engagement is a key aspect of public lands management; therefore any certification related actions on public lands need to follow applicable public participation laws, regulations and policies for process and substantive input, as well as FSC' s engagement guidance.	ENV	See above
Principle 1				
General (and also Principle 5)	“The Forest Service recognizes the importance of National Forest System mineral resources to the well-being of the Nation, and encourages bona-fide mineral exploration and development. But, it also recognizes its responsibility to protect the surface resources of the lands under its care. Thus, the	FSC should be aware of the vulnerability of the USFS to political maneuvering (See: Mining on Federal Lands, 04/03/2002 by Marc Humphries, Congressional Research Service).	SOC	Thanks for this. Mining and below-ground permit issues were considered in developing Draft 2 and it was concluded that an additional requirement was not necessary. This will be considered again as part of the forest testing.

	<p>Forest Service is faced with a double task: to make minerals from National Forest lands available to the national economy and, at the same time, to minimize the adverse impacts of mining activities on other resources.”</p> <p>www.fs.fed.us/geology/1975</p> <p>The impacts of mining (and to a lesser extent grazing) on FS lands is a source of frequent conflicts with the environmental community. Mining leases are potentially possible even in pre designated Wilderness areas. FSC certification would strengthen arguments against mining, but would not preclude mineral leasing.</p>			
<p>Indicator 1.1.1 (and elsewhere related to following existing laws, etc)</p>	<p>Indicator 1.1.1 (Guidance): The guidance states that “pre-decisional objections, administrative appeals and lawsuits do not alone constitute nonconformance” with the requirement for National Forest management to follow all applicable laws. This is a seriously flawed approach, given that such objections, appeals, and lawsuits can be important indications that management is not compliant with relevant laws and regulations. Rather than include guidance that takes no account of objections, appeals, and lawsuits, the standard should treat them as indications of likely non-conformance, and require certification auditors to examine the concerns raised in those objections, etc., to determine if there is in fact non-compliance.</p> <p>Indicator 1.1.1: The draft indicator’s</p>		<p>ENV</p>	<p>Guidance: It is not practical/feasible to have the auditors evaluate these objections/appeals, as they go through a separate judicial process. Supplementary indicatory 1.1.1 and its guidance does address the stakeholder comment, and it raises the bar on the existing requirements of the standard.</p> <p>The FSC standard cannot prohibit the use of congressionally mandated tools and provisions such as CEs. Negative implications could be caught by actual performance nonconformities in the rest of the standard.</p> <p>Regarding existing laws and regulations: Criterion 1.1 and Indicator 1.1.1 clearly state that legal compliance will be achieved.</p> <p>Legal compliance alone is not sufficient for conformance with the entire standard. All of the remaining Principles must still be</p>

	<p>requirement for demonstrating that processes are in place that are designed to resolve disputes and legal challenges is quite insufficient, since those processes may not be designed or actually successful in achieving genuine legal compliance per se. Instead, The Forest Service should be required to demonstrate that any valid concerns with legal compliance that are raised in pre-decisional objections or other processes are in fact being fully resolved such that genuine legal compliance will be achieved.</p> <p>The standard as a whole, including the indicators for Principle 1, does nothing to prohibit the Forest Service’s use of highly inappropriate exemptions from normally applicable legal requirements, including “categorical exemptions” from the National Environmental Policy Act. The standard should explicitly prohibit the use of inappropriate exemptions including emergency determinations and other expedited administrative procedures. Incidental Take Statements that serve as exemptions from the Endangered Species Act’s normal requirements for protection of threatened and endangered species and their habitats should also be closely scrutinized in this context. The standard as a whole also generally fails to require that environmental values be managed at levels required in existing laws, regulations, and some plans for</p>		<p>conformed with in order to be certified, even if a certified entity is not legally required to manage in such a way.</p> <p>Legal compliance and Endangered Species and habitat are addressed in Indicator 1.1a, C6.1, C6.2, Indicator 6.3.a.2 and Indicator 6.3.a.3</p> <p>FSC certification is an outcome-based approach.</p>
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	<p>National Forests (setting aside Principle 1's requirement for compliance with applicable laws). This shortfall highlights the standard's weakness and insufficiency, and risks the FSC's credibility with stakeholders and the public who are familiar with existing legal and planning requirements for these forests. Even more importantly, the standard's failure to incorporate and exceed the specific requirements of the existing legal framework and more conservation oriented management plans for National Forests means that if existing laws, regulations, and management plans for National Forests are weakened – as some are seriously threatened with – then the FSC will be certifying National Forest management that is significantly worse than currently occurs. We trust that this is not the FSC's intention, and that the FSC understands how this would seriously tarnish its reputation. To safeguard against this very real risk, the standard should include safeguards against the weakening of conservation-oriented provisions in existing laws, regulations, and forest plans. The obvious approach would be to include much more detailed and objective and science based management prescriptions for National Forests in the standard that mirror the existing conservation requirements of the National Forest Management Act (NFMA), other priority laws and regulations, and</p>			
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	more conservation oriented forest plans like the Northwest Forest Plan (NWFP). An alternate approach might be to simply require that the current provisions of NFMA and the NWFP, for example, must be followed even if they are rolled-back.			
Indicator 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 – thank you for catching this!
Indicator 1.2.a	In Indicator 1.2.a (Guidance) , the standard appears to lock-in 25% payments to states, regardless of whether this continues to be a statutory or regulatory requirement. Such a “lock-in” would be inappropriate for a certification standard – and highly imbalanced with the standard’s approach to the future of other important current legal and regulatory requirements.		ENV	This is meant as an example and FSC certification could not ‘lock in’ these payments if congress decides to eliminate them. In any case, these examples have been removed due to this concern.
USFS Applicability for Indicator 1.5.a	Support		SOC	Thank you
Indicator 1.5.1	This Indicator is vague and hard to audit. Specifically, what does “affirmative action” mean? How would an auditor determine conformance? That phrase causes unnecessary vagueness...remove it.	“National Forest identifies the location of illegal and unauthorized activities and demonstrates awareness of these activities and its impacts on the National Forest.”	CB	Thanks for pointing this out. We will look at alternative language in the forest testing to ensure auditability and clarity.
USFS Guidance for Indicator 1.6.a	Statement or demonstration of support should be required as prescribed in Indicator 1.6.a but a specific individual should not be named in the standard for the USFS or any potential FSC certificate holder. We’re not sure the reason or	Delete	SOC	This level of specificity was provided because, for the USFS, it is not clear who the ‘forest owner or manager’ is. It’s important that there is no ambiguity as to whether it is expected that the Forest Supervisor, of the Regional Forester, of the Chief, or the Secretary of Agriculture is

	interest in having a specific name or title attached to the FSC commitment.			required to provide this statement of support. There is general consensus that it should be the Chief and therefore this is provided for clear interpretation in the standard. It's not clear from the comment what the concern about this is.
Principle 2				
USFS 2.3.b	Supplement unnecessary. Documentation requirement already covered under existing indicator.	Delete	ECON	Given the dispute system for the Forest Service and the nature of disputes/objections/appeals, it is felt that existing indicator 2.3.b does not sufficiently describe the type of documentation that needs to be maintained.
Principle 3				
General	Indian reservations in the West often share boundaries with National Forests. How forests are managed by the FS can impact reservation forests and waters as a result clearcuts and fires. Severe budget constraints limit the capacity of the FS to oversee concessionaire practices. FSC certification could potentially require better management practices. For a somewhat severe critique, see Alison Berry, Two Forests Under the Big Sky: Tribal Versus Federal Management, PERC Policy Series, No. 45, 2009.	The Confederated Salish – Kootenai Tribes of the Flathead Reservation in NW Montana are practicing uneven-aged management of their forests. This practice could be an ecologically and economically sound model for FSC certified management across the country. See Becker & Corse, The Flathead Indian Reservation: Resetting the Clock with Uneven-Aged Management, JOF Vol. 95, No. 11, 1 Nov. 1997, pp. 29 - 32 and Handley & Dickinson, The Case for Uneven-Aged Management of Southern Pine by Small Forest Owners, National Woodlands, Winter 2016, pp. 11 – 13.	SOC	Thank you for bringing this up and these references. The issue expressed in this comment should be covered under existing and supplementary requirements in P3 and P6 related to collaboration with tribes and with landscape conservation (including off-FMU considerations).
USFS Supplement to Indicator 3.2.a	I think you meant 'or' and not 'ore'.	...developed or revised...	CB	Good catch – thank you!
Indicator 3.2.a	During auditing, there could be some confusion regarding how this	Add "If American Indian groups have legal rights or	CB	It seems that since this is a supplement to Indicator 3.2.a (which has text that makes

	supplement to Indicator 3.2.a is interpreted. Specifically, if it is determined in evaluation of the regular 3.2.a that there are no American Indian groups with rights or agreements, do supplemental requirements still apply? Should be NO when the Criterion language is reviewed.	other binding agreements to the National Forest...” to the very beginning of the Indicator.		it clear it is a requirement where applicable) that we don't need another disclaimer here. This will be further considered during the forest testing.
USFS Supplement to Indicator 3.2.a	Support		SOC	Thank you
Principle 4				
General	Need to include documented benefits to local communities	There need to be clear and documented benefits to local communities regarding forest management.	ENV	We believe this is sufficiently covered in existing and proposed additional requirements under P4 (and P5). Anything specific?
Indicator 4.1.c (existing)	US law requires that at least the prevailing wages be paid on service contracts in excess of \$2,500 on federal lands. Text should be revised as indicated in the “proposed change” column.	Forest workers are paid the highest of wages set according to a collective bargaining agreement, service contract wage determinations or the prevailing wage for similar work in the local area. Employer surveys may not be used in determining prevailing wages.	SOC	OK – a supplement to the indicator will be considered for the forest testing, and using the provided recommended language.
Indicator 4.1.c (existing)	An additional supplement is needed.	The U.S. Forest Service either conducts regular inspections itself to assure that wages are paid in full and on time, or collaborates with the U.S. Department of Labor in conducting such inspections regularly.	SOC	OK – a supplement to the indicator will be considered for the forest testing, and using the provided recommended language.
USFS Supplement to Indicator 4.1.e	Repeats Indicator 5.2.a that is already in place for all public forests	Delete	SOC	Agreed that it is almost identical but it provides a bit more specificity around contracts and forest-based work, which was a strong request made by social organizations working with federal lands

				communities.
USFS 4.1.e	Supplement unnecessary, almost identical to existing indicator.	Delete	ECON	See above
USFS 4.1.1	Delete this supplement. Existing indicator already requires participation in local economic development and makes the first sentence redundant. The second sentence of the supplement appears to change role of USFS to job training agency rather than a resource management agency.	Delete	ECON	This indicator is not redundant because it concentrates on forest worker training, and specifically for forest-based and high-skill work. However, it is duly noted that the first sentence does not belong in the standard since it is not the National Forest that would provide the opportunity, it's just the National Forest that would also participate in it. It has been revised to focus more on what it is the National Forest specifically should do and that is within their mandate.
USFS Indicator 4.2.1	Monitoring could be confused with implying actions under C8.2. Would 'enforced' be too strong of a term? Otherwise, guidance on how this indicator is intended to reinforce other parts of the standard should be included in guidance.	USFS Guidance for USFS Indicator 4.2.1: When and where USFS staff, such as contract administrators, detect noncompliance, corrective actions or legal options should be pursued. Violations must be reported to the CB as described in indicator 1.1.a.	CB	OK – the language will be revised accordingly.
Guidance for 4.2	Consistency and clarity could be improved here by editing language so it matches Indicators 4.1.a and 4.1.b regarding forest workers "covered under a National Forest legal contract or agreement"	Edit ...”to the extent that they are covered under legal contracts” to “...covered under a National Forest legal contract or agreement”	CB	OK – will revise accordingly.
Indicator 4.2.a	An additional supplement is needed	The U.S. Forest Service either conducts regular inspections itself to assure that contractors and subcontractors are complying with all applicable labor laws, or collaborates with the U.S. Department of Labor in conducting such inspections regularly.	SOC	OK – this will be included in the supplement to 4.2.a
USFS 4.4.1	Clearly redundant, indicator already clarifies public participation process	Delete	ECON	It does seem redundant with Indicator 4.4.d for public lands, and will be re-

	requirements. This supplement adds nothing new.			considered in the forest testing. The addition of ‘early and ongoing engagement’ is the supplementary piece.
USFS Indicator 4.4.2	The certifier’s report may contain the names and contact details of stakeholders in the confidential section, thus making it difficult for NFs to publish the entire report unless CBs modify their report templates and/or record-keeping systems.	Guidance to CBs in the supplementary audit procedures should be provided to protect the confidentiality of stakeholders and USFS staff.	CB	OK – it does say that “personal identifiable information may be withheld” but we will make sure this is clear in the auditing procedures.
Indicator 4.4.2	This isn’t consistent with the USFS Auditing procedures where only a public summary is required and is contradictory in saying that they rules do not require full report.	Edit so these are consistent. Full support of the full report being available so the recommendation would be to edit the Auditing procedures.	CB	OK – will do
Principle 5				
General	Recognizing that conservation and ecological restoration must be the primary management objective for certifying National Forests. The standard as a whole fails to require that management of National Forests be focused on ecological conservation and restoration, and that active management be limited to compatible activities, in light of public expectations for these forests, and in light of the role that National Forests need to play within a broader, regional and national-level forest landscape in which most non-federal forests occur. Most non-federal forests are managed primarily for timber production and have resulted in negative cumulative impacts to wildlife and lack important habitats, species, carbon stores and climate resilience, protected areas, wilderness values, and other priority		ENV	The standard and additional requirements do recognize the conservation (and social) objectives of the Forest Service, though it also needs to be understood that these are not the “primary” management objectives. Focus on restoration, ecological conservation, wilderness values, social attributes, habitats, species, climate adaptation, and carbon stores are addressed in P5 Guidance; C5.1 Intent; C5.5 Intent; Indicator 5.5.1; C5.6 Intent; P6 Intent; Indicator 6.1.a Supplement; Indicator 6.1.1; C6.3 Intent. Indicator 6.3.1; Indicator 6.3.2. Indicator 6.4.b Supplement Indicator and Guidance. Other impacts mentioned in comment are addressed throughout the existing FSC-US standard in primarily C6.1 and C6.3.

	ecological and social attributes. Unless considerably strengthened, these proposed standards will not substantially conserve and re-develop those qualities.			
USFS Guidance for Principle 5	What about local public interest and market conditions? Local market conditions determine how much diversity of product offerings can be reasonably available. Not every forest has the same capacity for diversity of products and ecosystem services.	Consistent with local market and ecological conditions, the National Forest manages for a diversity of products, ecosystem services, and social benefits for the national public interest.	CB	It is not clear if this is necessary, and it will be considered during the forest testing.
USFS Guidance for Principle 5	Although this guidance is markedly better than the previous draft, it still is not relevant to just the USFS. This requirement is already addressed in other portions of Principle 5 and Principle 6.	Delete	SOC	While the point raised is true, emphasis is provided in the guidance because of stakeholder concerns.
USFS Intent Criterion 5.1	Timber harvest and financial responsibility should not be primary focus of forest management on public lands	Include recognition that timber harvest and financial profitability are not the primary purpose of forest management for the US public lands, as would be the case for private ownerships.	ENV	It seems that the suggested language in the draft sufficiently covers this concern.
USFS 5.1.a	Supplement unnecessary, covered under existing indicator.	Delete	ECON	The existing indicator does not ask for defining, documenting and prioritizing, which was felt to be important particularly given the budget constraints and backlog of activities faced by the Forest Service.
USFS Guidance for Indicator 5.1.b	This language is highly inappropriate. In the context of Indicator 5.1.b and its existing guidance, this means that timber harvest may be increased, road maintenance decreased, or other inappropriate actions taken in response to predictably fluctuating		ENV	The standard needs to be responsive to the fact that USFS has appropriated funds and is not funded by its own timber harvest on its own forest – by tying this to appropriations, clarification is provided that forest level cash-flow issues are not tied to increases in timber harvest. Additional qualifier was added to the

	budgets and allocations.			guidance to address the concern raised.
USFS Supplement to the Indicator 5.4.a	Support		SOC	Thank you
USFS Supplement to the Indicator 5.4.b	Support		SOC	Thank you
Indicator 5.4.a & 5.4.b	Like the edits. 5.4.b references an applicability note that doesn't exist.	Correct reference to applicability note.	CB	OK – and thanks for pointing out error. Will fix!
Criterion 5.5 intent note from Draft 1	The 2nd draft standard as a whole is even weaker than the 1st draft standard, having deleted the intent note for Criteria 5.5 that recognized “forest services such as watersheds and fisheries” as an “overarching objective of forest management.” While that language was not sufficient to properly address the conservation-oriented role that National Forests must play in the broader forest landscape in the U.S., its removal suggests the FSC does not seriously intend to address that role. Both the National Forest Management Act and the 2012 NFMA rules recognize watershed and aquatic protection.		ENV	NFMA and other rules do recognize watersheds and aquatic protection (and other conservation objectives), but these are not the overarching or primary objectives, so that is why the intent note was revised. An intent statement was added the next draft stating that this is a core responsibility of the National Forest, including taking a landscape approach and working across ownerships and in collaboration with other agencies. Watershed and aquatic protection are also addressed in Supplement to Indicator 6.5.e.1 and various other Indicators in the existing FSC-US standard (primarily C6.3 and C6.5). This issue will be further considered during the forest testing, and we are looking into NFMA and the 2012 planning rule for compatible language.
USFS Indicator 5.5.1	Harvest and fire are not the only ways for carbon to be ‘removed’. Insect outbreaks or wind events, for example, may result in the net flux of carbon from the forest ecosystem to	USFS Indicator 5.5.1 The National Forest quantifies and tracks carbon stocks, carbon removal (through harvest, fire and other significant	CB	OK – will make additions.

	the atmosphere.	disturbances) and sequestration over time, and documents the rationale for methodologies employed.		
USFS 5.5.1	Adhering to this supplement would be an excessive burden that individual National Forest units would have to face to address this proposed indicator that goes well beyond the requirements of this criterion.	Delete	ECON	Carbon issues generally fit within this Criterion and will be further emphasized as the standard transitions to the new P&C and IGIs, so there is reason to include this here. Through consultation with USFS, it appears that this would not cause excessive burden to National Forests and is/can be included in new forest plans.
USFS 5.5.1 (and carbon more generally)	The standard as a whole fails to sufficiently require that National Forests be managed to maintain and enhance existing carbon stocks, to minimize logging and other activities that diminish forest carbon and result in significant greenhouse gas emissions, and to maintain and enhance the forests' natural resilience to climate change and its effects. Indeed, these topics are largely unaddressed in the standard, much less addressed via indicators that provide clear, outcome-oriented performance metrics. This is despite the overriding importance of reducing the risk of more catastrophic climate change by protecting and enhancing existing forest carbon sinks, and the fact that National Forests are among our best opportunities to do this within the US, in part because they are meant to be managed for public trust resource values. This also despite (as we understand it) an expectation that the standard will address the requirements of the revised FSC		ENV	Requirements related to carbon/climate change have been strengthened in the next draft to respond to these comments. They are addressed in Indicators 5.5.1, 6.1.a and 6.3.i. These will be a focus of the forest testing.

	<p>international standard (Principles & Criteria) and the generic international indicators written to help implement the revised P&C, both of which clearly define the environmental values that must be protected under Principle 6 as including “ecosystem functions (including carbon sequestration and storage),” and which define High Conservation Values that must be protected under Principle 9 as including ecosystem services, which in turn are defined to include “regulating services such as regulation of ... climate....”</p> <p>As discussed above, the standard does not even protect—let alone expand upon—all existing old growth and late successional forest stands and trees, despite them being irreplaceable carbon stores in any relevant timeframe, and despite them representing the forest condition that will likely be most resilient to unavoidable climate changes already in motion, including due to their naturally greater fire resistance and their provision of cooler microclimates than many younger forests.</p> <p>The draft standard is not even as robust as the prior draft, having deleted language at indicator 5.5 requiring that “where carbons [sic] stocks are degraded compared to historic levels, the Forest Service undertakes actions to restore and enhance carbon stocks....”</p>			
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	<p>Indicator 5.5.1 needs to explicitly require that all forest carbon stocks and management effects are accounted for when doing carbon accounting, that the fate of removed wood and its carbon stores is accurately forecast, that all greenhouse gases (GHGs) are accounted for, and that future sequestration is not used to hide near and mid-term emissions and carbon stock losses. Forest carbon accounting practices currently in use in different contexts often fail to account for important carbon pools (e.g., soil carbon), ignore potentially significant management effects (e.g., emissions from the logging and manufacture of wood products, equipment operations and application of nitrogen fertilizers), and typically overestimate the long-term storage of carbon associated with harvested fiber and wood as well overestimating reduced emissions from fires as a result of thinning. Given the urgency of the climate change situation, future sequestration forecasts should not be used to hide near and mid-term GHG emissions and losses of carbon stocks.</p>			
<p>Indicator 5.5.2 (and 6.1.1)</p>	<p>Indicators 5.5.2 and 6.1.1 need to be fundamentally reworked or deleted. Fire is an ecologically important and inevitable natural disturbance process for all forest types, and the Forest Service’s well intentioned policy, now widely understood as misguided, of</p>		<p>ENV</p>	<p>Fire and disturbance requirements will be revised in the next draft, after further expert consultation and forest testing.</p> <p>Fire is addressed in Indicators 5.5.2, 6.1.a, 6.3.i.: “...manage for natural fire regimes, ... work with local authorities to discourage residential and commercial</p>

	<p>attempting to suppress most fires should not be replicated in this standard. Instead, the Forest Service should be required to manage for natural fire regimes, restore forests' natural resilience to fire, work with local authorities to discourage residential and commercial development in forest types that are fire prone and in other high risk locations, and focus any prevention and suppression efforts on buffers immediately adjacent to existing development. It should be noted that large-scale logging and thinning treatments result in forest carbon losses that are most often greater than emissions from fires, particularly when taking into account the probability of a fire occurring where treatments has occurred. Further, the characterization of "catastrophic fire" is very subjective and does not provide best science guidance that recognizes the ecologically beneficial and necessary role of wildlands fire, including fire classified as intense. [See footnoted citations in comment letter]</p>			<p>development in forest types that are fire prone and in other high risk locations, and focus any prevention and suppression efforts on buffers immediately adjacent to existing development..." are specifically addressed in the Standard.</p> <p>"Uncharacteristic fire (based on a departure from Natural Range of Variability) has also been substituted for "catastrophic".</p>
Indicator 5.5.2	<p>The standard as a whole also fails to address and prohibit the Forest Service's often excessive and ecologically damaging use of post fire salvage logging. Instead, Indicator 5.5.2 suggests an endorsement of activities to restrict "catastrophic" fire. Post fire logging is generally and appropriately regarded as a "tax" on an ecosystem. Complex early seral habitat following</p>		ENV	<p>Fire is addressed in Indicators 5.5.1, 6.1.a, 6.1.1, 6.3.i, and. 6.5.h,</p> <p>The standard cannot prohibit post-fire logging; however, multiple indicators do place safeguards on harvest, including salvage.</p>

	fires, highly bio-diverse and essential for forest succession is also lost when logged post fire. New indicator language should be added that clearly states that post fire logging is not appropriate for certification. [See also footnoted citations in comment letter]			
Indicators 5.5.1 and 5.5.2	Need to add language about climate change in relation to carbon stocks.	Require National Forests to maintain and enhance existing carbon stocks to help mitigate climate change.	ENV	As noted above, requirements related to carbon were revised, and will be further considered during the forest testing. Indicators 5.5.1, 6.1.a, and 6.3.i includes such requirements.
Indicators 5.5.1 and 5.5.2	Edit the language to reinforce modern understandings of fire policy	Ensure that the Forest Service will not manage lands to suppress all fires. In a more rigorous, but not separate, standard for federal lands, the Forest Service should be required to manage for natural fire regimes and forest ecosystems that are resilient to fires and other threats, which should minimize the risk of catastrophic fires and related carbon emissions.	ENV	See above
C5.6 intent	A concern has been expressed that National Forests might be certified without holding them accountable for lower harvest levels than targeted by the forest plan. There is also concern that certification under this language may have a chilling effect on harvesting and the benefits to local communities, especially for communities and businesses where the National Forest controls the availability of timber locally.	We suggest alternative language: Certification mandates that the harvest of forest products occurs within the context of the forest plan and is a tool for achieving larger scale environmental, economic, and social objectives/services on the National Forest. Timber harvest levels should be evaluated for their impact to local communities and businesses especially where	ECON	Agree that the harvest of forest products should occur within the context of the forest plan, including fulfilment of the stated objectives of the plan. This seems to be adequately covered already in the draft, and will be reviewed during the forest. The concern expressed is understandable, though there are many reasons why timber targets are not met and the standard cannot mandate them to be met.

		the National Forest controls the availability of timber locally.		
USFS Intent Statement for C5.6	How can stocking, regeneration and growth be sustained without harvest or other disturbances, including natural events? Does the statement that “Certification does not mandate harvest of forest products” conflict with indicator 1.4.a since part of USFS’ public mandate is forest products?	USFS Intent Statement for C5.6 Certification may not mandate harvest of forest products. Forest management is a tool for achieving larger scale environmental, economic, and social objectives/services on the National Forest.	CB	It seems that the issue here is that the intent statement is meant to be generic (certification, in general, does not mandate harvest of forest products). The commenter looks at the intent statement as specific to this situation. If that is the case, then this confusion is rightfully pointed out. The next draft will either reflect the proposed language or in other ways clarify that this is a general statement.
USFS Intent Statement for C5.6	Although this intent is markedly better than the previous draft, it still is not relevant to just the USFS. This requirement is already addressed in other portions of Principle 5 and Principle 6 for all FSC certificate holders. We believe this is inherent in the FSC certification system and making it a specific intent statement for the USFS unfairly singles out the organization. We feel this way even if the statement may or may not be justified.	Delete	SOC	As noted in response above, agreed that this is a general statement that applies to all certification and that it should not single out USFS; however, as discussed previously, this was added as a response to stakeholder concerns.
USFS Intent Statement for C5.6	The intent statement does not sufficiently require that National Forest management be focused on ecological conservation and restoration, nor as an intent statement is it clear that it will be enforceable (or “normative”). Saying that certification does not mandate timber harvest is not the same thing as providing an objective standard that clearly delineates where, how, and when timber harvest is appropriate, or that all active management shall be focused on		ENV	Intent statements are normative. Planning management activities (where, when, how) is addressed by Indicators 6.1.b, 6.1.1, 6.1.c, 6.3.g.2, 7.1.c. and 7.1.e Supplement. The standard cannot further prescribe where, how and when timber harvest is appropriate beyond the safeguards and requirements that are already provided. The mandate of the USFS also cannot be changed.

	ecological conservation and restoration of ecosystem function, including biodiversity protection and restoration, including watershed protection.			
Logging, general	<p>The standard should also incorporate other long-standing recommendations from conservation biologists and FSC members, including the recommendations of “Applying Conservation Biology And Ecosystem Management To U.S. Federal Lands And Forest Certification,” by Dominick A. DellaSala, Reed F. Noss, David Perry.. Among other things, this valuable article states:</p> <ul style="list-style-type: none"> • “With the exception of legitimate restoration, we strongly recommend no logging (certified or otherwise) in regions where [late successional/old growth] or other high conservation value (HCV) forests have declined below historical levels.” • “Generally, conditions resembling pre-European settlement are an acceptable framework for gauging the efficacy of restoration approaches.” <p>See also footnoted citations in comment letter]</p>		ENV	<p>See other comments related to timber harvest, successional stages, old growth, etc.</p> <p>Text has been added to indicators related to desired future conditions and resilience regarding restoration approaches.</p> <p>Late successional/old growth and HCVPs are addressed in various places of the Standard especially P9 and C6.3. Restoration is addressed in multiple Indicators. Evaluation of historic conditions are addressed in existing Indicators 6.1.a and 7.1.c</p>
USFS Supplement to Indicator 5.6.a	Support – should be required for all public forests		SOC	Thanks – this will also be considered as FSC US revises its overall standard.
Principle 6				
General (Conservation)	Higher standard of compliance for conservation management on public	For all of the other conservation measures [i.e.,	ENV	OK – this is believed to be adequately covered in the draft.

	lands	not RTEs that were commented on separately in the FSC standard], compliance should be examined closely to make sure that public land management is held to the highest standard of care.		
General (Ecological wellbeing)	Need to establish be specific benchmarks or performance-based measures regarding ecological wellbeing	There should be specific benchmarks or performance-based measures regarding ecological wellbeing of our public forests, such as indicator species like fish and wildlife habitat to ensure forests are managed to maintain viable well distributed populations of native species across planning area.	ENV	This is covered in P6 assessments and P8 monitoring.
General (and grazing)	Achieving more ecologically oriented management than is currently required of National Forests. Between the topics that are not addressed, the topics with insufficient conservation expectations, and the topics that are only addressed via overly subjective and open-ended requirements, the proposed National Forest standard as a whole (hereinafter, “standard”) will not result in significant improvement in the management of our National Forests or correction of serious outstanding concerns with National Forest management. The roadless area provisions, for example, are not even as protective as the Roadless Rule currently applicable to National Forests. To truly meet the FSC’s stated goal for		ENV	Regarding roadless area provisions, the standard does meet the Roadless Rule because it would be covered under C1.1. It does bolster these protections by considering roadless areas as HCVs that, if identified as an HCV, need to be protected according to HCV provisions. Grazing is addressed in 6.1 and 6.5.h, and stronger and more detailed requirements are being proposed in the next draft, including that other, non-riparian impacts and issues are also addressed. It is believed that off-road vehicle use/recreation/unauthorized activities are already strong enough (Indicator 1.5.b, USFS Indicator 1.5.1, Indicator 6.5.g, and elsewhere). Mining and energy development is

	<p>National Forest standards, they should meet the current Roadless Rule as well as bolster the current Rule's protections.</p> <p>The standard as a whole also does not address and correct serious ecological and resource problems that exist in many National Forests with other intensive and/or high impact uses that degrade forest-related resources and values, uses such as livestock grazing, mining, energy development projects, and off-road vehicle usage.</p> <p>For example, the standards do not include an indicator for livestock grazing, despite the fact that it has widely and adversely impacted forest health and fire regimes on National Forests (see footnoted citation in comment letter). An indicator should be developed to address the alterations of natural fire regimes, facilitation of invasive species, harm to native species, and degradation of aquatic resources resulting from grazing. Specifically, grazing reduces native herbaceous vegetation and soil productivity, and it contributes to missed fire cycles and increased forest density in certain forest systems. Significant cumulative effects result where timber or fuel management and livestock grazing combine to disturb soils and spread exotic plants, as occurred at Mount Trumbell in northern Arizona, where cheatgrass dominates sites managed for</p>		<p>addressed in Indicator 6.10.f, but only as it relates to conversion from forest to non-forest land use. Please suggest specific language, or the specific issue of concern, that merits a supplementary requirement.</p>
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	restoration (see footnoted citation in comment letter). Cheatgrass is especially competitive in the Southwest and Rocky Mountain regions owing to its ability to suppress water uptake and productivity of competing native species, its ability to quickly establish a root system on recently burned sites, and its high tolerance of livestock grazing (see footnoted citations in comment letter)			
USFS Supplement to Indicator 6.1.a	'Disturbance' should be plural.	USFS Supplement to Indicator 6.1.a The assessment includes vulnerability to catastrophic fire or other major disturbances resulting in large scale carbon emissions (see also USFS 5.5.1).	CB	OK – Thanks for pointing this out.
Indicator 6.1	“A landscape level analysis...is completed by the Forest...” Could this be an analysis already completed by others, e.g. The Nature Conservancy or state resource agency? If a credible analysis exists then adopting it could lessen the burden of certification on the FMU. The cost of certification requirements is a legitimate concern for the FMU and could be a barrier to National Forest certification.		ECON	Yes, it seems that the analysis could be completed by another credible entity. Text will be modified to allow for that.
Indicator 6.1.1 and 6.1.2 (landscape conservation)	The Principle 6 indicators relating to landscape conservation appear to be even weaker than those provided in the 1st draft of the standard.		ENV	The intent was to make them clearer, not weaker. It is not clear why they are considered to be weaker.
Indicator 6.1.1	Too complicated.	Break into 2 Indicators: 6.1.1: National Forest conducts	CB	This was considered in developing the draft and it was determined that the

		<p>a landscape-level assessment of the extent and condition of successional stages of concern (including old growth, early successional habitat, habitat for RTE species or plant communities, etc.).</p> <p>[this is mostly addressed in 6.1.a and the best approach might be just add whatever is missing from there...suggest just adding landscape-level analysis for USFS.]</p> <p>6.1.2: National Forest conducts an impact assessment to determine direct and cumulative effects of USFS management actions (including no active management) to the successional stages identified in 6.1.1 on the National Forest and neighboring affected lands.</p> <p>[this is mostly addressed in 6.1.b and the best approach might be just add whatever is missing from there...landscape-level analysis for USFS; no management analysis, etc.]</p>		<p>landscape indicators did not easily integrate into the existing 6.1.a and 6.1.b. Further analysis and consideration will be given to this issue in the next draft to make the indicators less complicated.</p>
USFS Indicator 6.1.1	<p>Referring to the FME, FMO, forest owner, forest manager or organization as 'Forest' has no precedent in the FSC system. 'National Forest' is a defined term in this standard and should be used. The rest of the indicators should be reviewed to ensure consistency in terminology.</p> <p>Definitions for old growth under USFS and FSC-US should be compared for any conflicts. Where secondary growth is at an advanced enough stage to be ecologically</p>	<p>USFS Indicator 6.1.1 A landscape-level analysis of the extent and condition of successional stages of concern (including old growth, late successional, early successional habitat, habitat for RTE species or plant communities, etc.) is completed by the National Forest, to determine the direct and cumulative effects of USFS management actions</p>	CB	<p>OK – will make sure that 'National Forest' is consistently used. This text will be considered in the next draft.</p>

	similar in function and structure with FSC-US old growth, this should be called 'late seral' or 'late successional.'	(including no active management) to such successional stages within the FMU and on neighboring affected lands.		
USFS Indicator 6.1.1	While this indicator references the topic of successional stages, old growth, and habitats for rare, threatened, or endangered (RTE) species, it fails to provide any objective, performance-oriented metrics or guidance for the types of successional stages that should be prioritized by National Forest management. Thus any particular approach taken by the Forest Service can be deemed to be in compliance, provided the Forest Service is simply explicit about what it is doing. Late successional habitat should also be assessed.		ENV	<p>This indicator and the subsequent one was revised to clarify that these are landscape-level issues and for all successional stages (including late successional), etc.</p> <p>Other, non-landscape-level requirements related to successional stages, etc. are covered elsewhere. Successional stages are addressed in Indicators USFS Indicator 6.1.1, Indicator 6.3.a.1, Indicator 7.1.b, Indicator 10.2.a, and Indicator 10.2.e.</p> <p>The Standard addresses non-landscape-level requirements related to successional stages as well.</p>
USFS Indicator 6.1.1 and 6.1.2	These indicators seem to address areas that are already covered by other portions of the standard. Successional stages are covered in Indicator 6.3.a.1. But we may not be understanding the specific requirements for the USFS that these indicators are addressing that is different than any other public ownership or indicators covered in other parts of the standard.		SOC	These indicators concentrate on landscape level analysis and management whereas other indicators are more narrow in focus. This will be clarified in the next draft.
USFS Indicator 6.1.2	Drop this indicator as it is already covered under C 6 3	Delete	ECON	See above
USFS Indicator 6.1.2	Too complicated	<p>Same above for 6.1.1. Could make this one 6.1.3. Or roll into 6.1.c as Supplement.</p> <p>6.1.3: Based on assessments in 6.1.1 and 6.1.2, management actions shall be implemented to maintain,</p>	CB	See above

		restore or enhance the extent, quality and viability of any successional stage that at risk.		
USFS Indicator 6.1.2	As noted below, indicator 6.1.2 also does not provide a sufficient approach to addressing National Forests' necessary role in landscape level ecosystem conservation and restoration, though it does begin to address the topic.		ENV	See above
USFS Indicator 6.1.2	This indicator fails to provide an ecologically sufficient threshold and management goal for old growth and late successional ecosystems, and instead only requires protection or restoration where these or any other successional stage is "so inadequately represented as to threaten its long term viability." In other words, old growth and late successional ecosystems may be managed at the brink of extinction, and need not be managed for their natural levels of abundance, including as is needed for RTE species and their recovery, water quality, carbon sequestration, climate change mitigation, and other public values. Moreover, this indicator only requires that "neighboring affected lands" (per Indicator 6.1.1) need be "considered," when looking at the broader landscape context – despite how this can overlook what is happening in the broader forest landscape, including on private industry forestlands where old growth and late successional forests providing important habitats for RTE		ENV	<p>This indicator has been revised (and moved) in the next draft, as per above, to focus on all landscape-level issues (and not just old growth and successional stages), and it does also include all successional stages.</p> <p>Other concerns raised in the comment are already addressed in other parts of the standard, for example Indicator 6.3.a.1, 6.2.b and 6.2.c focuses on maintaining/restoring/protecting/enhancing RTE to levels needed to maintain their viability.</p> <p>Successional stages are addressed in USFS Indicator 6.1.1, Indicator 6.3.a.1, Indicator 7.1.b, Indicator 10.2.a, and Indicator 10.2.e. Other issues in the comment are addressed in Indicator 6.3.a.1, Indicator 6.2.b, and Indicator 6.2.c.</p>

	species are now almost entirely absent, and have even been logged pursuant to Endangered Species Act exemptions with the understanding that National Forests would provide compensating habitats.			
USFS Supplement to the Indicator 6.2.a	Support		SOC	Thank you
Indicator 6.2.c (and need for more RTE protection in the USFS requirements)	<p>The standard as a whole is insufficient for the recovery of rare, threatened, and endangered species. Nowhere does the standard fully require that National Forests be managed for the recovery of RTE species across their natural ranges, including by providing additional habitat quality, quantity and connectivity beyond what is currently found in the forest management unit, including for RTE species that are not currently found in the management unit, but that may need habitat there for their recovery. An appropriate indicator for management would be to ensure that fish and wildlife habitat are managed to maintain viable, well distributed and interconnected populations of existing native species across the planning area.</p> <p>Indicator 6.2.c of the existing national standard begins to address this topic, but provides no independent measure of what constitutes recovery, which is important given that National Forests and other federal public lands already legally must address the</p>		ENV	<p>This is addressed in C6.2 as well as various Indicators in C6.1, C6.3, C6.4 and C6.5 especially Indicators 6.1.1, 6.3.b, 6.3.c, 6.3.2. 6.4.b., and 6.5.e</p> <p>RTE requirements are an increase from what USFS currently does, and supplementary requirements further augment this. Existing Indicator 6.2.c also talks specifically about meeting all these goals. This would be audited by the CB to verify compliance</p>

	<p>topic of species recovery, but in practice often do so with plans that are insufficient for species' actual recovery. The Forest Service also is known to hamper species' recovery by eliminating threatened and endangered species' habitat and populations, including via Endangered Species Act exemptions known as incidental take statements. For example, the agency is currently implementing post- fire salvage logging on thousands of acres of critical habitat for threatened northern spotted owl in the Klamath National Forest, which will harm or kill up to 100 or more individual birds and set back recovery of the species. Under FSC's standards, this would be certifiable forestry even though it is unacceptable for owl recovery.</p>			
C6.2 (RTE)	<p>Need to strengthen language around rare and endangered species</p>	<p>Full protection of threatened and rare/endangered species on the landscape, including surrounding lands not in the FMU, should be required in accordance with Endangered Species Act and related legislation and regulations. National Forests should be managed specifically for the recovery of rare, threatened, and endangered species.</p>	ENV	See above
USFS Intent Statement for C6.3	<p>Also begins to address this topic, by saying that National Forests are to "make significant contributions to landscape-scale conservation goals and opportunities." However, it is</p>		ENV	<p>Intent statements are mandatory. This is not up to USFS discretion because the intent is audited by the CB.</p> <p>The outcomes and levels of performance</p>

	unclear if this statement imposes any mandatory (or “normative”) requirements on the Forest Service. It is clear that the statement provides no specific benchmarks or other performance-based measures for the certification of National Forests, with actual outcomes and levels of performance being entirely at the Forest Service’s discretion. The indicators for criterion 6.3 may also not be suited to address the overall management direction of National Forests; while they address topics that are crucial in this context (e.g., successional stages, old growth, and riparian management zones (RMZs)), a host of other management consideration also need to be addressed in this context.			are not up to FS discretion because conformity with this intent is audited by the certification body. Other considerations are addressed elsewhere in the standard.
USFS Guidance to Indicator 6.3.a.3	Indicator 6.3.a.3 is not exclusively a public lands indicator as stated in the guidance. Stating that ‘control and removal’ are ‘carried out’ is redundant; eliminating ‘carried out’ ensures the same meaning and intent. Since the indicator states that these are examples, use of ‘may’ should occur in the sentence on examples. A decision should be made on whether or not terms such as ‘early successional’ and ‘late successional’ will be hyphenated or not.	USFS Guidance to Indicator 6.3.a.3 Requirements related to old growth, including the public lands section in Indicator 6.3.a.3, refer to both Type 1 and Type 2 old growth. Examples of activities required to maintain the values of old growth may include, but are not limited to: <ul style="list-style-type: none">• Prevention, control and removal of exotic species• Prescribed fire• Habitats of late-successional and Rare species may be created or enhanced	CB	OK – good clarifications and suggested revisions will be considered in the next draft.
USFS Guidance to Indicator 6.3.a.3	Support		SOC	Thank you
USFS Guidance to Indicator 6.3.b	Support		SOC	Thank you
USFS Guidance on	The standard’s language here is		ENV	It seems that the concerns raised are

6.3.a.3	<p>highly insufficient and problematic. All old growth trees and stands should be identified and protected, as should all late successional stands (i.e. future old growth), not just those old growth stands that meet the “type 1” and “type 2” thresholds that were developed by the FSC for private forest management. In other words, there should be no minimum acreage size for old growth stands, regardless of whether they are categorized as type 1 or type 2, or otherwise. Equally important, all forest stands should be surveyed for old growth and late successional components, and if identified, logging or thinning would not be appropriate for certification. There may be exceptions (e.g. some drier stands of old growth where fire has been excluded, where genuinely small diameter thinning from below could be appropriate). Under those circumstances, no new roads should be constructed, strict diameter limits and canopy closure requirements defined, and one entry permitted. Protection of old growth and late successional stands should also be the conservation priority, rather than the active management examples provided in the guidance. The protections for old growth should also be mandatory indicators, not optional guidance.</p>			<p>addressed throughout the Standard. The USFS Supplement to Indicator 6.3.a.3 addresses all area sizes for old growth.</p> <p>The DoD/DoE indicator about all old growth being identified (mapped) was added into the next draft, with alignment to ‘old growth’ terminology and classifications (type 1 and 2) in the standard.</p>
USFS Indicator 6.3.1 from first draft (old growth)	The Standard as a whole fails to make the consistent protection and restoration of historical extent of old growth and late successional forests	Indicators for old growth: A more appropriate goal and Indicator would be to require that National Forests are	ENV	<p>See above.</p> <p>DoD/DoE indicator related to identifying these stands will be added in the next</p>

	<p>a priority for National Forests. The standard is even less protective and restorative of old growth than the prior draft, having removed the indicator from the prior draft (indicator 6.3.1) requiring that: “late-successional and old-growth stands of all sizes are identified. Forest management is conducted only to maintain or enhance their late-successional and old-growth composition, structures, and functions.” As a result, the standard is not even as protective of current and future old growth as is the existing FSC standard for Department of Defense and Department of Energy forestlands.</p>	<p>managed to maintain existing and restore historical extent for old growth and late successional ecosystems, given how these ecosystems have been extirpated across nearly all forest landscapes outside of federal forests and given that RTE species associated with forests are frequently associated with old growth and late successional forests. Further, mature forests are also more effective at storing and sequestering carbon, at providing microclimates that mitigate against climate (see citation footnote in comment letter) change, being resilient to fire and other natural disturbances, protecting water quality, and providing other important public values.</p>		<p>draft.</p>
<p>Indicator 6.3.g.1 and 2</p>	<p>The standard as a whole fails to limit logging to science-based ecological restoration projects, fails to provide meaningful definitions and parameters for restoration and other restoration treatments, and fails to meaningfully rule out clearcutting, post-fire salvage, and other practices largely determined to be harmful to ecosystem function by conservation science and rejected by the public. Clear guidance and parameters for the types of management practices and projects that will be considered as “restoration” are essential, given</p>		<p>ENV</p>	<p>An overall (primary) focus on ecological conservation/restoration goes beyond the mandate of the FS and FSC/certification cannot change their mandate. The standard addresses ecological conservation and restoration in multiple places, with many safeguards in place while still allowing for active management. FSC is not the tool for prohibiting active management of national forests.</p> <p>Regarding “restoration”, this again is a benefit of certification, where logging and restoration will be audited by the certification body.</p>

	<p>that the Forest Service uses the term very broadly including to repackage and justify logging projects that do not reliably advance restoration and/or are harmful to sensitive ecological values.</p> <p>Indicators 6.3.g.1 and 6.3.g.2: “When even-aged silviculture systems are employed, such systems contribute to the attainment of ecological objectives. The use of and size and distribution of even-age harvests within the FMU [forest management unit] and structural retention within those harvest areas are ecologically justified.” Given that it is merely a process requirement, provides no definition of “ecological objectives,” and establishes no required management outcomes or management parameters, this language will do nothing to restrict the use of clearcutting or other unnecessary, ecologically damaging, and publicly unacceptable practices in National Forests.”</p>			<p>This additional FS requirement already raises the bar on how even-age management is practiced. Verification that this is “ecologically justified” will be audited by the CB. Any more is overly narrowing the scope and overly prescriptive.</p> <p>Elsewhere in the standard, safeguards are in place to make sure that timber harvest/even-age management is not ecologically damaging; however, there may be instances (i.e., existing plantations), where even-age management is not damaging and meets all other FSC requirements.</p> <p>A better understanding of FS application of even-age management will be a focus of the forest testing.</p>
<p>Indicators 6.3.g.1 and 6.3.g.2 (and elsewhere needing more prescription)</p>	<p>The standard as a whole does not provide a sufficiently objective, outcome and performance oriented approach to providing certification standards for National Forests. Too often, it merely asks the Forest Service to undertake an analysis or process, and leaves the objectives for that process, and the resulting management prescriptions, largely to the Forest Service’s discretion.</p> <p>For example, indicators 6.3.g.1 and 6.3.g.2 state that “when even-aged silviculture systems are employed,</p>		<p>ENV</p>	<p>See above</p>

	<p>such systems contribute to the attainment of ecological objectives. The use of and size and distribution of even-age harvests within the FMU and structural retention within those harvest areas are ecologically justified.” This language essentially allows the Forest Service to conduct as much clear cutting (even-aged logging) as it wishes, regardless of actual circumstances, as long as the managers can provide some rationale to the FSC’s auditors. The language regarding “ecological objectives” will be of little assistance here, given that <i>any</i> ecological objectives will count under the standard, no matter how weak or inconsistent with the recovery of natural forests they might be. Similarly, any explanation that references ecological factors is likely to qualify clearcuts as “ecologically justified.” The standard does not even provide any specific limitations on clearcutting or requirements for retention within harvest units for National Forests – even though the existing FSC forest management standard provides parameters and guidance for opening sizes and retention for private timberlands and other non- federal forestlands.</p>			
<p>USFS Indicator 6.3.1</p>	<p>The glossary refers to ‘refugia’ rather than ‘ecological refugia,’ which given the definition provided is redundant. Why are refugia referred to in plural and singular forms? It is confusing.</p>	<p>USFS Indicator 6.3.1 Areas within the FMU that actively function as refugia (see Glossary), are identified and continue to be managed as such. Forest management is limited to actions needed to</p>	<p>CB</p>	<p>OK – seems like an appropriate edit.</p>

		support the composition, structures, and functions of a particular refugium.		
USFS Indicator 6.3.1	Ecological refugia are already covered in the Representative Sample Areas analysis under Criterion 6.4 and HCVF type 1.	Delete	SOC	Will reconsider this in the next draft.
Indicator 6.3.b	<p>The standard as a whole does not give sufficient priority to the protection and restoration of biodiversity beyond RTE species per se.</p> <p>Indicator 6.3.b and its intent statement begin to address this important topic. However, the indicator fails to require that <i>all</i> native species be maintained in well distributed populations in National Forests; instead, the Forest Service could meet the indicator by providing well distributed populations of whatever species it chooses to focus on, which could be the species least in need. Restoration of habitat is also entirely optional under this indicator. Moreover, it is not clear if the intent statement is enough to make indicator 6.3.b mandatory (“normative”) for National Forests.</p> <p>Indicator 6.3.b and the standard as a whole are not even as protective and restorative of biodiversity as is the existing FSC standard for Department of Defense and Department of Energy forests, which states that when “existing protected areas within the landscape are not adequate in number, size, or configuration to assure the long-term</p>		ENV	<p>The standard includes multiple indicators and requirements, specifically in P6 and P9 address this, including not only RTE species and communities, but native plants and animals (that latter of which includes invertebrates) in general, including common species. RSAs and HCVF specifically serve general biodiversity protection.</p> <p>Although it doesn’t say ‘all’, this also doesn’t imply that the FS ‘picks and chooses’. Again, the CB verifies conformity to the requirements and to the intent.</p> <p>The intent statement is normative.</p> <p>The DoD/DoE indicators were not include because they are already in the standard.</p>

	viability of the existing elements of native biological diversity (including but not limited to Rare species and plant community types, ecological refugia, and relict areas (see Glossary)), the forest manager designates protected areas to enhance their viability.” The FSC should require that National Forests be managed at least as well for conservation purposes as has been established for certification of DOD and DOE lands.			
USFS Supplement to Indicator 6.4.b	We suggest that the strongest RSA system is an integrated or coordinated effort among the FSC FM certificate holders in a region to analyze, identify and protect a system of RSA’s to the extent possible based on the Scale, Intensity and Risk of the FMU. The intent to hold the National Forest to a higher standard by requiring RSA analysis and establishment irrespective of whether such RSAs already exist may have the opposite effect by creating a disincentive for other certificate holders to create RSAs, if the National Forest has established a ‘complete’ RSA system.	We suggest that “The National Forest is expected to take a leadership role in an integrated or collaborative approach of designating RSAs including the establishment of RSAs to reflect the opportunities present on the National Forest FMU. The National Forest should in particular assess existing RSA designations for gaps and designate RSA’s that fill those gaps.	ECON	While this supplement may create the unintended incentive for non USFS lands to not protect RSAs, it is believed that this is happening in many cases anyway and it will be addressed in the revision of the national standard. The IGLs look at on-FMU RSA protection irrespective of what’s going on outside the FMU. Additional language will be considered for the next draft regarding the leadership role of the USFS in collaborating with other landowners.
Indicator 6.4.b (and elsewhere needing more prescription)	Even some of the standard’s better and more valuable provisions suffer from being too open to interpretation. Indicator 6.4.b (Guidance), for example states that “as National Forests play a critical role in		ENV	The supplementary requirements already significantly raise the bar on what is expected of USFS. Further, existing requirements in 6.4 seem to adequately address these concerns. As with all indicators in the standard, the

	protecting existing ecosystems, it is therefore required that the National Forest maintains and/or expands an ecologically viable, resilient, well-distributed, and where possible, interconnected protected area system for all native ecosystem types found on the FMU.” This is a very important provision. However, the standard should go further in providing some external measure of viability, resilience, and “well-distribution,” instead of largely leaving it to interpretation by National Forest managers.			CB verifies compliance.
USFS Supplement to Indicator 6.5.d	This indicator is long and confusing. Use of bullet points would help. Crossings may not be limited to culverts and bridges. “Meets but does not exceed access needs” would appear to be redundant with “where needed, construction of new road segments.” The indicator is clear that all elements of it should be implemented where needed.	USFS Supplement to Indicator 6.5.d As part of its transportation system planning, the National Forest periodically conducts a road inventory and crossing (e.g., culverts, bridges) assessment and has a strategy for effectively maintaining a road system that meets but does not exceed access needs, through measures such as the following: <ul style="list-style-type: none"> • Upgrades; • Abandonment, decommissioning or otherwise closing; and, • Construction of new road segments. 	CB	OK – seems appropriate to revise according to suggested language.
USFS Supplement to Indicator 6.5.d	This supplement should be in Principle 8 related to monitoring. Several other monitoring indicators are separated from their indicators and placed in Principle 8 such as monitoring of effectiveness of management plans, yields from harvested timber and NTFP, HCVFs, road systems, and socio-economic requirements.	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	SOC	This will be considered in the next draft, though 6.5.d goes beyond just monitoring.

		assessment.		
USFS Supplement to Indicator 6.5.e.1	Indicator 8.4.b already would capture the second sentence of this supplemental indicator (“Where monitoring indicates protection measures are not achieving their goals, they are adjusted as necessary to protect water quality.”).	If the intent is to make this requirement more explicit for National Forests, then incorporate the second sentence of this indicator into a supplement for 8.4.b. Otherwise, 8.4.b would already cover this in an ideal world.	CB	Agreed that this is about monitoring, but it also includes the action of adjusting buffers and protection measures to protect water quality, which is why it is here. The next draft will also cross-reference to 8.4 or 8.2
Indicator 6.5.e.1	Monitoring is not a C6.5 activity. Move to C8.2.	Move to 8.2.d.1. Could include a cross reference in 8.2 to 6.5.e.1	CB	See above
Indicator 6.5.e.1 and related indicators and appendices about water /riparian protection	With only a few limited exceptions, the standard as a whole fails to provide any substantive requirements for the protection and restoration of water bodies, water quality, and aquatic species beyond those found in the existing FSC National Standard (including in Appendix E), despite those existing requirements having been developed with (and often substantially limited by) an understanding of what is economically feasible for private forest managers, despite at least some National Forests currently having recognized the need for much more protective aquatic resources strategies, and despite some federal lands’ more protective aquatic resource strategies currently threatened with severe weakening. The exceptions to this pattern, i.e., indicators 6.5.e.1 and 6.5.f , regarding monitoring and culvert flow sizes, are valuable and should be maintained. Indicator 6.5.e.1 and Appendix E of the FSC National Standard		ENV	In addition to the regular FSC-US Standard, aquatic resources are addressed in various supplemental requirements including Indicators 6.5.e.1, 6.5.f, and 6.5.h. Emphasis on watershed analysis and prioritization has been made in the next draft.

	<p>needs to be augmented to include performance-based requirements that include explicit buffer widths for RMZs and other objective management prescriptions for water bodies, water quality, and aquatic species that are more suited to conservation-oriented federal public forests, and that are as least as protective as the existing regulatory and management plan provisions applying to National Forests. The draft supplement for indicator 6.5.e.1 does not even begin to address this need, though it is otherwise good. More specifically, certification standards should ensure that timber harvest and other management will maintain and restore aquatic ecosystems and riparian habitat on National Forests. An ecosystem approach is warranted to stop degradation (e.g. cessation of road construction in key watersheds and road removal) of aquatic ecosystems and to maintain riparian habitats that are currently in good condition, and to aid recovery of at-risk species. It is both prudent and necessary given the perilous condition of most native fishes and many reptiles, amphibians, mammals and insects, particularly in the Pacific Coast, Rocky Mountain and Southwest regions. Moreover, it is consistent with direction in the 2012 NMFA Planning Rule to “maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area.” 36</p>			
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	<p>C.F.R. § 219.8(a)(1) (ecosystem integrity); <i>Id.</i> § 219.9(a)(1) (same). The Forest Service currently applies a relatively successful approach to management of aquatic ecosystems in the Pacific Northwest Region. In 1994, the agency adopted the Aquatic Conservation Strategy (“ACS”) as part of the Northwest Forest Plan. The ACS:</p> <ul style="list-style-type: none"> • Requires watershed analysis at the scale of large drainage basins to assess road density, vegetation cover, and ecological processes that contribute to high-quality and functional riparian habitats for species associated with aquatic ecosystems. • Designates key watersheds in large drainage basins that offer the highest quality habitat, which tend to be free of dams or host large areas without roads, where recovery of at-risk species has the greatest likelihood of success. In key watersheds, increased road density is prohibited, and timber harvest is informed by watershed analysis. • Establishes riparian reserves on lands that are generally parallel to streams, in close proximity to wetlands, or geologically unstable. • Requires that management in riparian reserves meet or not prevent attainment of nine discrete objectives related to 			
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	<p>physical, chemical, and biological aspects of aquatic ecosystems, as informed by watershed analysis.</p> <ul style="list-style-type: none"> • Encourages active restoration activities in riparian reserves, include road density reduction and removal of roads where they cross streams or unstable terrain. <p>Prohibits use of mitigation measures or planned restoration activities as a substitute for preventing degradation of existing high-quality riparian habitat. Monitoring reports produced by the Forest Service and cooperating agencies consistently demonstrate that implementation of the ACS has proven successful at (1) arresting aquatic ecosystem degradation on national forest lands, (2) maintaining high-quality riparian habitat where it currently exists, and (3) promoting recovery of federally-listed fish populations. Draft FSC certification standards will result in lesser and inadequate aquatic conservation outcomes than the ACS has produced in the Pacific Coast Region. In fact, they offer less conservation value for some riparian habitats than currently apply to private forestlands. For example, rules under the Oregon Forest Practices Act demand riparian setbacks of 30-to-100 feet for perennial streams. Those rules contribute to endangerment of at-risk fish populations, but they exceed the FSC standard for “Category B”</p>			
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	streams in the Pacific Coast Region. [See also footnotes and citations in comment letter]			
USFS Supplement to Indicator 6.5.f	Support		SOC	Thank you
Principle 7				
Indicator 7.1.e	Management plan should include a description of these activities so edit to be consistent with the full 7.1.e	Add “a description of” before activities	CB	OK – can add
USFS Supplement to Indicator 7.1.e	Support - Should be required for all federal public lands and consideration given to all public lands		SOC	Thank you – will consider as part of the larger standards revision for public lands.
USFS Supplement to Indicator 7.1.l	The adjective form of ‘silvilculture’ is ‘silvicultural.’	USFS Supplement to Indicator 7.1.l The management plan describes the rationale for site-specific selection of silvicultural system(s) used, including structural retention measures when even-age management is employed (see also Indicator 5.6.a and Indicator 6.3.9).	CB	OK – thanks for catching this
USFS Guidance Indicator 7.2.a	Support		SOC	Thank you
USFS Guidance to Indicator 7.3.a	Subject verb agreement. International norms for standards specify that use of such terms as ‘adequate’ be avoided.	USFS Guidance to Indicator 7.3.a Given the substantial reliance on forest contractors and subcontractors to implement management activities on National Forests, it is important that effective oversight is provided, and that the National Forest’s procedures for evaluating and monitoring forest worker training/supervision are verified during the certification process.	CB	OK – can make this change.
Principle 9				

<p>P9 Intent</p>	<p>The standard as a whole fails to adequately recognize and protect roadless areas.</p> <p>The intent statement for Principle 9 merely requires, in effect, that the Forest Service consider all inventoried roadless areas for designation as high conservation value (HCV). As a result, there is no assurance that these roadless areas will actually be designated and protected as HCV. The intent statement's approach also fails to recognize uninventoried (e.g. unroaded) roadless areas, despite their recognition in the 1st draft of the standard. Moreover, the intent statement is weaker than the existing FSC management standard and its guidance, which calls for consideration as HCV of all roadless areas down to 500 acres (whether inventoried or not). (Forest Service inventoried roadless areas, by contrast, often only cover areas of 5,000 acres or larger). (The drafter's comment in the 2nd draft, to the effect that classification of roadless areas as HCV must be secondary to an HCV assessment by the forest managers, is not necessarily correct. In cases where an FSC standard defines a resource as HCV, then the question for assessment is not whether that resource is an HCV, but merely whether those resources exist within the management unit, and whether their condition warrants specific approaches to protection and/or enhancement.)</p>		<p>ENV</p>	<p>It does not make sense to automatically classify roadless areas as HCV (roadless areas in the east are not the same as in the west, for example), though the standard does require that HCV assessments be done on all roadless areas. Following a robust, stakeholder-inclusive HCV approach, roadless areas that should be classified and managed as HCVs will occur.</p> <p>Stronger language has been added to the next draft to make it clear that it is expected that roadless areas (inventoried and non-inventoried) are HCV and that an assessment needs to be done.</p> <p>The intent cannot be weaker than the existing FSC standard and guidance, since all existing standard requirements and guidance apply to FS lands, plus additional intent, etc.</p>
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	<p>Instead, the indicators and intent statements for Principle 9 should clearly mandate that all roadless areas in National Forests be identified and protected as HCV, rather than merely being considered for protection. This should include both inventoried and uninventoried (e.g. unroaded) roadless areas >1,000 acres. Roadless areas down to 500 acres should probably also be considered for protection as HCV, per the existing US standard and its guidance, particularly in eastern forests.</p>			
<p>USFS Intent for Principle 9</p>	<p>The Principle 9 intent statement for intact forest landscapes is also insufficient. The standard should also recognize and protect intact forest landscapes that are less than the 50,000 ha (124,000 acre) threshold used by FSC International, given that intact forest landscapes are relatively fragmented and rare in the US. It is our understanding that this is the approach currently recommended by the draft FSC international indicators for intact forest landscapes. Equally important, intact forest landscapes should be explicitly protected from logging, development, and other activities that would compromise their intactness, not just road construction (both permanent and temporary), as recognized by the draft FSC international indicators for intact forest landscapes. These requirements should probably also be incorporated into the standard as</p>		<p>ENV</p>	<p>The FS requirements take the same approach to IFLs as required by FSC IC.</p> <p>Actually, for this next draft, we have removed all reference to IFLs since it is not currently in the FSC US FM standard. Clarifications/revisions on the IFL approach will be taken up during the IGI/standard transfer process, and as they are incorporated into the FSC US FM standard, we will then revisit to see if anything supplementary is needed for USFS.</p>

	mandatory indicators, not just as intent statements that are likely to be overlooked and that may not be sufficiently mandatory (or “normative”). Importantly, there is an international movement toward recognizing the importance of primary and intact forest landscapes (IFLs) in the UN’s Sustainability Goals, Aichi Biodiversity Targets, and other international fora. FSC-International is well aware of resolutions that have been proposed to protect IFLs and primary forests presented to its General Assembly.			
USFS Intent for Principle 9	‘Intact Forest Landscape’ is not defined in the FSC-US standard or this supplement.	Provide the definition of ‘Intact Forest Landscape’ in this supplement.	CB	See above
USFS Indicator 9.1.1	Support – Should be required for all public lands		SOC	Thank you – will be considered as part of larger standards revision for public lands
USFS Guidance Indicator 9.3.c	Repeats indicator. Isn’t everything important?	Delete	SOC	Yes, but helps to emphasize heightened role of USFS in doing this.
Principle 10				
Principle 10	USFS has areas that would likely meet the definition of ‘plantation’ in Western Nebraska.	Default to Southwest or Rocky Mountain regional guidance may be acceptable in this special case.	CB	It is not clear why this needs to be stated since regional guidance needs to be followed anyway, and with the understanding that Indicator 10.5.g (public lands requirement to restore) is also applicable.

Section Ib: Comments on the supplementary requirements to the CB auditing procedures

General	Different terms used “national forest” and “US Forest Service” and “Forest Service”...can be confusing	Take approach used in Supplementary requirements and start with a scope statement: “USDA Forest Service (USFS: National Forest)” and then consistently use these terms	CB	OK – will revise accordingly
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General	Lots of good additions; reorganization and clarification compared to first draft	NONE	CB	Thank you
Public notice	It is not clear in this section which types of audits need a public notice. It is mostly clarified in future sections (except pre-assessment does not include public notice bullet) but would be best to list the types of audits that need a public notice right in this section	Add a bullet point that says “public notice is required for all audit types—pre-assessment, full evaluation and annual audits”	CB	OK – will revise accordingly
Public notice	Last bullet point specifically says “developing the field itinerary for the pre-assessment”. This should be applicable to all audit types (full evaluation and audits too). First bullet point: technically the accreditation standard requires public notices to be at least 6 weeks before field work (not 45 days)	Remove “for the pre-assessment”	CB	OK – will revise accordingly
2, second bullet point	It is entirely feasible that an auditor could have experience social impacts assessment and be effective without having first conducted ‘social auditing’ as long as a lead auditor participates on the team.	For the full assessment, the audit team consists of a minimum of four people, and one each with the following disciplines: forestry, social auditing or impacts assessment, biology/ecology, and public lands expertise. The pre-assessment and annual surveillance audit may consist of fewer team members if deemed to be sufficient to meet the requirements of the accreditation standard.	CB	OK – will revise accordingly
Pre-assessment	Last sentence of the NOTE says “it is proposed that...” which introduces unnecessary vagueness	Delete “it is proposed”	CB	OK – will revise accordingly
Pre-assessment	Not clear that a public notice is required	Add bullet point—make it the second one—that says “Public notice is provided at a minimum of 60 days in advance (in line with the requirements of #3 above”	CB	OK – will revise accordingly
Pre-assessment	Survey instrument comment in vague	Add “provided by FSC US” or if you expect CB to develop, include more	CB	OK – will revise accordingly

		information about what is required or purpose		
Pre-assessment	Third bullet point on public summary needs to be clarified. Where is says “made available by Forest Service” it isn’t clear who it needs to be made available to	Edit to “made publicly available by Forest Service”	CB	OK – will revise accordingly
Full Evaluation	Not clear that a public notice is required	Add bullet point—make it the first one—that says “Public notice is provided at a minimum of 60 days in advance (in line with the requirements of #3 above”	CB	OK – will revise accordingly
Full Evaluation	There are some concerns about including the peer review comments in the public summary. The reviewer would need to be told their comments would be public and therefore they may not be as open with their feedback. In addition, most of the comments provided reference confidential sections of the report, which the public would not have access to. Therefore, there are concerns about this negatively impacting the quality of the reviews while at the same time not providing transparent and relevant information to the public.	Remove this requirement	CB	It is not clear why the review cannot be made public without attributing the comments to a peer reviewer and with removal of confidential and sensitive information
Full Evaluation	Last bullet point on public summary needs to be clarified. Where is says “made available by Forest Service” it isn’t clear who it needs to be made available to	Edit to “made publicly available by Forest Service”	CB	OK – will revise accordingly
4, 5 and 6, Supplementary requirements for National Forests, final bullet points	Refer to comment for USFS Indicator 4.4.2 above. Requests for confidentiality by stakeholders and USFS staff should still be honoured by the CB and USFS.	Add statement on confidentiality, sensitive and/or proprietary information that can be kept out of the report or included in confidential appendices or supplementary documents.	CB	OK – will revise accordingly
Annual audit	First bullet. Language is clear and good. This should be used in pre-assessment and full evaluation section	Copy to pre-assessment and full evaluation sections	CB	OK – will revise accordingly
Annual audit	third bullet point on public summary	Edit to “made publicly available by	CB	OK – will revise accordingly

	needs to be clarified. Where is says "made available by Forest Service" it isn't clear who it needs to be made available to	Forest Service"		
Annual audit	Third bullet includes "such as on the National Forest's web site". If this is the approach that is desired, be consistent and include this in the pre-assessment and full evaluation sections on public summaries	Add reference to National Forest's web site to public summary information to pre-assessment and full evaluation	CB	OK – will revise accordingly

Annex 1: Stakeholders who submitted comments

1. Kyle Meister
2. University of Kentucky Center for Forest and Wood Certification
3. Rainforest Alliance
4. JD Irving
5. WI DNR
6. Northwest Forest Worker Center
7. Josh Dickinson
8. Comments from an environmental consultant
9. Wisconsin County Forests Association
10. National Wildlife Federation
11. ENGO group of comments: BARK, Dogwood Alliance, Center for Biological Diversity, Geos Institute, Greenpeace, KS Wild, Natural Resource Defense Council, Oregon Wild, Rainforest Action Network, Sierra Club, Western Environmental Law Center, WildEarth Guardians