



## Controlled Wood FSC US National Risk Assessment: Guidance for Mitigation Options

*NOTE1: The following includes general descriptions of each Central Theme and the basic requirements associated with them. Each mitigation option within these Central Themes is customized for the individual specified risk topic and may have additional specificities or requirements. Please see the FSC US Controlled Wood Regional Meeting Reports for the complete mitigation options, including all details and required components.*

*NOTE2: The following guidance for implementation of mitigation options includes examples of mitigation activities that would be considered acceptable and/or not acceptable for the indicated level of required mitigation. These are examples only and are not comprehensive lists of acceptable and non-acceptable mitigation activities.*

*NOTE3: CH=Certificate Holder*

### CENTRAL THEME: Education & Outreach

- **GENERAL MITIGATION OPTION (CATEGORY 3):** Using materials as specified in individual mitigation options, communicate to audiences (also as specified) the conservation values of the HCV, threats from incompatible forest management (as described in the FSC US National Risk Assessment), and opportunities for conservation through management that enhances the HCV and reduces or eliminates these threats. The desired outcome of these communications is engaging landowners, foresters, and loggers in conservation of the HCV within the specified risk area and the Organization’s supply area.

*INTENT:* The intent of this mitigation option is to implement education and outreach-related actions that will result in changes to on-the-ground forest management activities that improve maintenance or enhancement of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

- **GENERAL MITIGATION OPTION (CATEGORY 4):** Using materials as specified in individual mitigation options, communicate to audiences (also as specified) the social benefits of keeping forests as forests, and the value-enhancing alternatives to conversion and opportunities for the maintenance of forests (e.g., tax-relief programs, succession planning). The desired outcome of these communications is engaging landowners within the specified risk area and the Organization’s supply area in the maintenance of forests.

*INTENT:* The intent of this mitigation option is to implement education and outreach-related actions that will result in maintenance of forests, and thereby mitigate the risk of sourcing materials from sites in the specified risk area where the forest is being converted to non-forest use.

<b>Examples of Acceptable Mitigation</b>
<i>Low Level:</i> Share educational materials, as indicated, with suppliers and request that the supplier provide evidence that the materials have been used in a way that will likely achieve the intent statement.
<i>Low Level:</i> Coordinate with a local conservation organization (as described in the mitigation option) that has experience with the specified risk issue in question to offer periodic outreach workshops, using materials as indicated in the mitigation option text, that will likely achieve the intent statement and then actively engage loggers,



brokers and/or consulting foresters associated within the CH's supply chains to attend the workshops.

Provide assistance to an organization with ongoing landowner outreach (e.g., State DNRs, non-profits, Public University Extension programs) consistent with the intent statement that allows that organization to incorporate outreach components specific to the specified risk issues in the supply area, or if these issues are already addressed, that allows that organization to expand or improve their program in a way that would likely drive more on the ground change.

> *Low Level:* Facilitate connections between the organization with ongoing landowner outreach and targeted landowners, or a similar kind of assistance with relationship-building that will likely improve achievement of the desired outreach objectives and of the intent statement.

> *Medium/High Level:* Increase the capacity of the organization with ongoing landowner outreach in a way that will allow it to reach more landowners, or improve outcomes with each landowner (i.e., increase agency, ability, specific training, time, etc. as needed to address the risk topic).

> *Medium/High Level:* Provide resources that will allow the organization with ongoing landowner outreach consistent with the intent statement to increase capacity.

In a region where a training program for loggers, brokers and/or consulting foresters already exists, provide assistance to the program that allows it to expand or improve in a way that would likely drive more on the ground change and achieve the intent statement. The following are potential examples of these contributions:

> *Low Level:* Actively engage loggers with whom the CH works to attend the training, and then verify that they attended.

> *Medium/High Level:* Invest in the development or implementation of the training to help it create greater impact on the ground.

> *Medium/High Level:* In addition to getting loggers to training and verifying that they went, work with specific loggers in targeted areas where there is a greater opportunity for creating change on the ground to help them in their engagement with landowners.

[NOTE: These examples are only valid if the training program includes content that is specific to the specified risk topic(s), as indicated in the individual mitigation option(s).]

In a region where loggers, brokers or consulting foresters, as relevant, are supplying multiple CH that have similar mitigation obligations, develop and implement a regional training program (or add a new component to an existing program) for these types of suppliers (i.e., those who can potentially influence activities on the ground) that is specific to the specified risk topics in the region and consistent with the intent statement. This example is specific to there being a single CH that is capable of coordinating development/implementation of the training, but with all CH contributing in some way. The following are potential examples of these contributions:

> *Low Level:* Actively engage loggers with whom the CH works to attend the training, and then verify that they attended.



> *Medium/High Level:* Make additional investments in the development or implementation of the training to help it create greater impact on the ground.

> *Medium/High Level:* In addition to getting loggers to training and verifying that they went, work with specific loggers in targeted areas where there is a greater opportunity for creating change on the ground to help them in their engagement with landowners.

Alternatively, if there is not a single entity capable of development/implementation, acceptable mitigation would be working with other CH to help make the kind of training in the example directly above possible. Examples of contributions in this scenario:

> *Low Level:* Actively engage loggers with whom they work to attend the training, and then verify that they attended.

> *Medium/High Level:* Invest in the development and implementation of the training.

> *Medium/High Level:* In addition to getting loggers to training and verifying that they went, work with specific loggers in targeted areas where there is a greater opportunity for creating change on the ground to help them in their engagement with landowners.

**Examples of Mitigation that is Not Acceptable at Any Level**

Complete reliance on mitigation implemented by another CH, without any additional effort by the organization to impact the potential mitigation of risk.

[NOTE: This example is not intended to reflect a situation where a CH is purchasing materials that have an existing FSC Controlled Wood claim.]

Support of, or reliance on, a training program that does not include content that is specific to the specified risk topic(s) or that is not consistent with the intent statement.

Reliance on email communications alone, with or without attachments, to suppliers or other audiences as the only mitigation implemented to address a particular risk issue (i.e., not part of a broader program or outreach effort).

[NOTE: Consultation with outreach and engagement experts indicates that it is almost impossible to change behavior via email alone.]

**CENTRAL THEME: Procurement Policy**

- GENERAL MITIGATION OPTION (CATEGORY 3, For organizations that purchase directly from the source forest): Develop/adapt a procurement policy that reflects the communications themes specified in individual mitigation options and clearly states the requirement that the landowner/forester/logger at the source forest will not supply materials from forests where the HCV is threatened as a result of the forest management activities that produced the forest materials. This will require providing a description of the HCV, potential threats to the HCV from forest management activities (as described in the FSC US National Risk Assessment), and the kinds of activities that would maintain or enhance the HCV in the specified risk area.

*INTENT:* The intent of this mitigation option is to implement a procurement policy that will either result in avoidance of materials from sites where the HCV is threatened by forest management activities, or result in changes to on-the-ground forest management activities that mitigate the risk



of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

- **GENERAL MITIGATION OPTION (CATEGORY 4, For organizations that purchase directly from the source forest):** Develop/adapt a procurement policy that reflects the communications themes specified in individual mitigation options and clearly states the requirement that the landowner/forester/logger at the source forest will not supply materials from forests that are being converted to a non-forest use.

*INTENT:* The intent of this mitigation option is to implement a procurement policy that will either result in avoidance of materials from sites where forest was converted to a non-forest use, or result in maintenance of forests, and thereby mitigate the risk of sourcing materials from sites in the specified risk area where the forest is being converted to non-forest use.

Examples of Acceptable Mitigation	Examples of Mitigation that is <u>Not</u> Acceptable at Any Level
Implement as indicated in the above Mitigation Option – the same for all levels of mitigation required. No additional guidance deemed necessary.	

## CENTRAL THEME: Research & Mapping

- **GENERAL MITIGATION OPTION (CATEGORY 3, Suggested for ‘High’ mitigation level):** Both of the following components must be implemented:

1. Engage with and/or provide monetary or in-kind resources to an entity or alliance that is: a) working to augment current maps of existing examples of the HCV within the specified risk area (as specified in individual mitigation options); or b) currently conducting, or has the capacity to initiate, research on the HCV pertinent to the specified risk area (also as specified); and
2. Use the results of the mapping or research to improve implementation of another mitigation option or demonstrate that the results of the mapping or research are being used in some other way to improve maintenance or enhancement of the HCV.

*INTENT:* The intent of this mitigation option is to implement mapping or other research-related actions and then use the outputs to increase the effectiveness of another implemented mitigation option that, in turn, will result in changes to on-the-ground forest management activities that improve restoration or maintenance of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

- **GENERAL MITIGATION OPTION (CATEGORY 4, Suggested for ‘High’ mitigation level):** Both of the following components must be implemented:

1. Engage with and/or provide monetary or in-kind resources to an entity or alliance that is working to improve predictions of future urban growth through modeling and mapping within the specified risk area, using remote sensing or other techniques that do not require landowner declarations regarding their ownerships; and
2. Use the results of the mapping work to improve implementation of another mitigation option or demonstrate that the results of the research are being used in some other way to maintain forests.

*INTENT:* The intent of this mitigation option is to implement research-related actions and then use the research outputs to increase the effectiveness of another implemented mitigation option that, in turn, will result in maintenance of forests, and thereby mitigate the risk of sourcing materials from sites in the specified risk area where the forest is being converted to non-forest use.



<b>Examples of Acceptable Mitigation</b>
<i>Low Level:</i> As an in-kind resource, facilitate access to lands targeted for mapping or research.
<i>Low Level:</i> Help an entity or alliance (as described in the mitigation option) gain access to spatial data that will enhance their mapping or research efforts.
<i>Medium/High Level:</i> Provide a grant to support scientific research that enhances relevant mapping or research efforts.
<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
Mapping or research that doesn't do any of the following: <ul style="list-style-type: none"> <li>• Contribute to knowledge about locations of HCVs in question or where forest conversion will most likely occur (i.e., where to target mitigation efforts)</li> <li>• Contribute to understanding of the HCV and/or how it should be defined (i.e., to assist in determining how to mitigate the risk)</li> <li>• Contribute to increased knowledge about how forest management can positively or negatively affect the HCV (i.e., how to mitigate the risk)</li> </ul>
Mapping or research that simply aggregates previously available information and doesn't contribute new information or analysis.

## CENTRAL THEME: Conservation Initiatives

- **GENERAL MITIGATION OPTION (CATEGORY 3):** Engage with and/or provide monetary or in-kind resources to conservation organizations or similar entities (as specified in individual mitigation options) that are supporting or promoting programs or projects to develop new or augment existing programs within the specified risk area and the Organization's supply area that will: a) result in increased and improved implementation of forest management practices for conservation of the HCV; and/or b) result in increased access to incentive programs for landowners who conserve the HCV.

*INTENT:* The intent of this mitigation option is to implement actions through conservation programs/projects that will result in changes to on-the-ground forest management activities that improve maintenance, enhancement or restoration of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

- **GENERAL MITIGATION OPTION (CATEGORY 4):** Engage with and/or provide monetary or in-kind resources to conservation partnerships, organizations or similar entities (as specified in individual mitigation options) that are supporting or promoting programs/projects to develop new or augment existing programs within the specified risk area and the Organization's supply area that will result in the maintenance of forests. These programs/projects may include incentives, such as working forest easements and other conservation easements.

*INTENT:* The intent of this mitigation option is to implement actions through conservation programs/projects that will result in maintenance of forests, and thereby mitigate the risk of sourcing materials from sites in the specified risk area where the forest is being converted to non-forest use.



<b>Examples of Acceptable Mitigation</b>
<p>Provide assistance to a conservation organization (as described in the mitigation option) that allows it to expand or improve its program(s) in a way that would likely drive increased on-the-ground change.</p> <p>&gt; <i>Low Level:</i> Facilitating connections between the conservation organization and targeted landowners, or a similar kind of assistance with relationship-building that will likely improve achievement of the desired conservation objectives and of the intent statement.</p> <p>&gt; <i>Low Level:</i> Facilitate access by the conservation organization to important resources, such as entry to targeted lands, opportunities for input into local policy development, pertinent data or research, etc.</p> <p>&gt; <i>Medium/High Level:</i> Increase the conservation organization’s capacity to implement conservation actions (i.e., increase agency, ability, specific training, time, etc. as needed to address the risk topic)</p>
<p><i>Conversion-specific:</i> In a region where community groups exist that have the interest and capacity to acquire and maintain forest for the ecosystem services provided to the community, work to raise landowner awareness of the opportunity to sell their lands to these organizations instead of selling to individuals/groups that would convert the forest. The following are potential examples of these contributions:</p> <p>&gt; <i>Low Level:</i> Facilitate connections between the community group and targeted landowners, or a similar kind of assistance with relationship-building that will likely improve achievement of the desired conservation objectives and of the intent statement.</p>
<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
<p>Support of an organization that is not active within your supply area or within the pertinent specified risk area.</p>
<p>Support of an organization that is not directly addressing the specified risk topic in question.</p>
<p>Support of an ‘off-set’ program/project that is working to directly compensate for HCVs that have been knowingly damaged or destroyed.</p>

## **CENTRAL THEME: Conservation Planning**

- **GENERAL MITIGATION OPTION (CATEGORY 3):** Engage in planning processes (as specified in individual mitigation options), and, when possible, the implementation of those plans, that include, or could potentially include, goals, objectives and/or actions that will likely have an impact on the HCV within the specified risk area and the Organization’s supply area. The desired outcome of this engagement is to increase and improve forest management practices that conserve the HCV.



*INTENT:* The intent of this mitigation option is to implement planning-related actions that will result in changes to on-the-ground forest management activities that improve maintenance, enhancement or restoration of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

- **GENERAL MITIGATION OPTION (CATEGORY 4, Applicable for all mitigation levels):** Engage in on-going regional landscape-level planning processes (land use and/or sustainable forestry) to support viable policies or regulations that are intended to promote maintenance of forests within the specified risk area and the Organization’s supply area.

*INTENT:* The intent of this mitigation option is to implement planning-related actions that will result in maintenance of forests, and thereby mitigate the risk of sourcing materials from sites in the specified risk area where the forest is being converted to non-forest use.

<b>Examples of Acceptable Mitigation</b>
<i>Low Level:</i> Provide comments during public scoping and/or consultation processes, encouraging and providing rationale for the incorporation of goals, objectives and/or actions consistent with the specifics of the mitigation option, and, if possible, participate in the plan implementation at a level similar to that suggested for the ‘Conservation Initiatives’ Central Theme.
<i>Medium Level:</i> Actively participate on a working group or planning committee during development of a plan, and, if possible, participate in the plan implementation at a level similar to that suggested for the ‘Conservation Initiatives’ Central Theme.
<i>Medium Level:</i> Provide financial or other support that makes it possible for a pertinent expert to actively participate on a working group or planning committee during development of a plan, and, if possible, participate in the plan implementation at a level similar to that suggested for the ‘Conservation Initiatives’ Central Theme.
<i>High Level:</i> Collaboration/coordination with other organizations to amplify existing efforts for forest-friendly land use planning in areas where planning structures already exist, but are uncoordinated.
<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
Support of planning or plans that don’t include your current supply area or intended future supply area, nor the specified risk area.
Support of planning or plans that don’t directly address the specified risk topic in question.
Support of planning or plans that will not be effective due to conflict with a higher-level planning process that has stronger regulatory or policy requirements or has precedent over the more local effort.

- **GENERAL MITIGATION OPTION (CATEGORY 4, Suggested for ‘High’ mitigation level):** If regional landscape level planning processes are not currently occurring, collaborate and develop an engagement strategy with 1) federal, state and/or local resource policy makers and planners, and 2) organizations/individuals advocating for policies or regulations aimed at maintaining



forests, with a goal to establish a regional landscape level planning process (land use and/or sustainable forestry) to support the development of viable policies or regulations that are intended to achieve maintenance of forests within the specified risk area and the Organization’s supply area.

*INTENT:* The intent of this mitigation option is to implement planning-related actions that will result in maintenance of forests, and thereby mitigate the risk of sourcing materials from sites in the specified risk area where the forest is being converted to non-forest use.

Examples of Acceptable Mitigation	Examples of Mitigation that is <u>Not</u> Acceptable at Any Level
Implement as indicated in the above Mitigation Option. No additional guidance deemed necessary.	

## CENTRAL THEME: Implement Management Activities

- GENERAL MITIGATION OPTION (CATEGORY 3):** Engage with and/or provide monetary or in-kind resources to conservation organizations or similar entities (as specified in individual mitigation options) that are facilitating active, on the ground implementation of management activities (also as specified) to restore, maintain or enhance the HCV, with a goal of long-term conservation of the HCV within the specified risk area and the Organization’s supply area.

*INTENT:* The intent of this mitigation option is to implement on-the-ground forest management activities that improve maintenance or enhancement of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

Examples of Acceptable Mitigation
Provide assistance to an organization (as described in the mitigation option) that allows it to expand or improve its management activities in a way that would likely drive increased on-the-ground change.
> <i>Low Level:</i> Facilitating connections between the organization implementing management activities and targeted landowners, or a similar kind of assistance with relationship-building that will likely improve achievement of the desired conservation objectives and of the intent statement
> <i>Medium/High Level:</i> Increase the capacity of the organization implementing management activities (i.e., increase agency, ability, specific training, time, etc. as needed to address the risk topic) consistent with the intent statement.
<i>Low Level:</i> Facilitate access by an organization (as described in the mitigation option) to important resources, such as entry to targeted lands, needed equipment, or pertinent data or research, etc.
<i>Low Level:</i> Coordinate with an organization (as described in the mitigation option) on development of work days whereby staff from the certificate holder organization provide labor resources to the conservation organization for activities consistent with the intent statement.



<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
Support of an organization that is not active within your supply area or within the pertinent specified risk area.
Support of an organization that is not directly addressing the specified risk topic in question or that is not consistent with the intent statement.
Requiring staff to volunteer their own time (i.e., weekends, vacation, holidays) for labor

## CENTRAL THEME: Staff Training

- GENERAL MITIGATION OPTION (CATEGORY 3, For organizations that purchase directly from the source forest):** Ensure staff and contract foresters receive training or the equivalent, with periodic refreshers that include (as specified in individual mitigation options) any new information on the HCV, identification, ecological function, management techniques, and provision of public values. The training or equivalent shall be: a) customized for the HCV as it occurs within the Organization’s supply area; b) developed by or developed in cooperation with organizations/individuals with expertise in conservation of the HCV or developed in collaboration with FSC US; and c) result in staff having knowledge on these subjects to the extent that they are able to communicate the same content to the landowners and land managers with whom they are working.

*INTENT:* The intent of this mitigation option is to train staff and contract foresters so that they are able to implement education and outreach-related actions that will result in changes to on-the-ground forest management activities that improve restoration or maintenance of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

<b>Examples of Acceptable Mitigation</b>
Implement as indicated in the above Mitigation Option. No additional guidance deemed necessary.
<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
Implementation of a training program that does not include material that is specific to the specified risk topic(s).
Reliance on email communications alone (i.e., not part of a broader outreach effort), with or without attachments, to staff and/or contract foresters.
Training staff and/or contract foresters without any follow-up to ensure they are using the knowledge gained in their training in communications with landowners and land managers.



## CENTRAL THEME: Landowner Incentives

- GENERAL MITIGATION OPTION (CATEGORY 3):** Engage with and/or provide monetary or in-kind resources to: 1) conservation organizations or similar entities (as specified in individual mitigation options) that are supporting or promoting programs or projects to develop new or augment existing incentive programs for landowners who restore, maintain or enhance existing examples of the HCV within the specified risk area and the Organization’s supply area; or 2) organizations (also as specified) that work to connect landowners with incentives provided by other entities within the same area.

*INTENT:* The intent of this mitigation option is to implement actions to increase incentives for landowners that will result in changes to on-the-ground forest management activities that improve restoration or maintenance of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

<b>Examples of Acceptable Mitigation</b>
<p>Provide assistance to an organization (as described in the mitigation option) that allows it to expand or improve its program(s) in a way that would likely drive increased on-the-ground change.</p> <p>&gt; <i>Low Level:</i> Facilitating connections between the organization that is working on incentives and targeted landowners, or a similar kind of assistance with relationship-building that will likely improve achievement of the desired conservation objectives and of the intent statement.</p> <p>&gt; <i>Low Level:</i> Facilitate access by the organization that is working on incentives to important resources, such as entry to targeted lands, opportunities for input into local policy development, pertinent data or research, etc.</p> <p>&gt; <i>Medium/High Level:</i> Increase the capacity of the organization that is working on incentives to implement their programs (i.e., increase agency, ability, specific training, time, etc. as needed to address the risk topic) consistent with the intent statement.</p>
<p><i>Medium/High Level:</i> In collaboration with an organization (as described in the mitigation option) that is willing to serve as a broker, develop an online clearing-house application that helps to match organizations/entities that would like to provide incentives with landowners that are interested in conserving their lands consistent with the intent statement.</p>
<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
<p>Support of an incentive program that is not active within your supply area or within the pertinent specified risk area.</p>
<p>Support of incentives for lands that do not currently have, nor have the potential for, occurrences of the HCV in question.</p>

- GENERAL MITIGATION OPTION (CATEGORY 3, For organizations with direct landowner contact):** Provide an incentive(s) to landowners for conserving existing examples of the HCV; or facilitate landowners’ access to incentives provided by other entities that will conserve the existing examples of the HCV.



*INTENT:* The intent of this mitigation option is to implement actions to increase incentives for landowners that will result in changes to on-the-ground forest management activities that improve restoration or maintenance of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.

<b>Examples of Acceptable Mitigation</b>
Implement as indicated in the above Mitigation Option. No additional guidance deemed necessary.
<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
Provision of incentives to landowners that are not within your supply area or within the pertinent specified risk area.
Provision of incentives for lands that do not currently have, nor have the potential for, occurrences of the HCV in question.
Provision of incentives to landowners without any follow-up to ensure they are conserving the HCV in question.

## CENTRAL THEME: Direct Influence

- GENERAL MITIGATION OPTIONS (CATEGORY 3, For organizations that purchase directly from the source forest):
  - A. Engage with a conservation organization or similar entities, or collaborate with FSC US, to identify landscapes of particular concern related to the risk of receiving non-certified supplies from areas where the HCV is threatened by forest management activities, and then communicate this information to suppliers, along with: 1) recommended Best Management Practices that will conserve the HCV; 2) contact information for organizations that may be interested in working with the landowner on conserving the HCV in question; and 3) a requirement that the landowner/forester/logger at the source forest either will not provide materials from the landscapes identified, or will document that the forest management practices implemented in the source forest did not threaten the HCV.
  - B. Document acceptable implementation of Best Management Practices that conserve the HCV for harvests that produce non-certified materials that will be controlled by the Organization.
  - C. Include Best Management Practices that will conserve the HCV in harvest plans and/or in contracts made with loggers for harvests that produce non-certified materials that will be controlled by the Organization and require in those harvest plans and/or contracts that the Best Management Practices are implemented.

*INTENT:* The intent of this mitigation option is to implement supplier-engagement actions that will result in changes to on-the-ground forest management activities that improve maintenance or enhancement of the HCV, and thereby mitigate the risk of sourcing materials from sites where the HCV in the specified risk area is threatened by forest management activities.



<b>Examples of Acceptable Mitigation</b>
Implement as indicated in the above Mitigation Option. No additional guidance deemed necessary.
<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
Engagement with landowners or harvests that are not within your supply area or within the pertinent specified risk area.
Engagement with landowners or harvests for lands that do not currently have, nor have the potential for, occurrences of the HCV in question.
Engagement with landowners or harvests without any follow-up to ensure that appropriate management is being implemented.

### CENTRAL THEME: BMP Monitoring

- GENERAL MITIGATION OPTIONS (CATEGORY 3, Central Appalachian CBA only, Suggested for ‘High’ mitigation level): The Organization, either individually or in collaboration with other Organizations, or through an intermediary entity, establishes and implements a program or process that results in voluntary submission of harvest and BMP implementation data from loggers/landowners within the specified risk area and the Organization’s supply area to the State agency responsible for this data collection in a way that is usable by the agency to supplement its established monitoring system. An emphasis should be placed on those BMPs that address practices for steep slopes and prevention of siltation. This program or process would require independent auditing or sufficient auditing by the state to confirm accuracy of voluntary data regarding BMP implementation.

*INTENT:* The intent of this mitigation option is to implement monitoring-related actions that will result in the State being able to demonstrate a very high level of compliance with BMPs, with an emphasis on those most likely to help conserve aquatic biodiversity, throughout the specified risk area, and, thereby, allow the Organization to demonstrate a low risk of sourcing materials from sites where the aquatic biodiversity in the specified risk area is threatened by forest management activities.

<b>Examples of Acceptable Mitigation</b>	<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
Implement as indicated in the above Mitigation Option. No additional guidance deemed necessary.	

### CENTRAL THEME: Cape Fear Arch Conservation Collaboration

- GENERAL MITIGATION OPTIONS (CATEGORY 3, Cape Fear Arch CBA only): Attend Cape Fear Arch Conservation Collaboration meetings and develop and implement an action plan (either alone or cooperatively with other Collaborative participants) that will improve the maintenance or enhancement of Cape Fear Arch biodiversity within the specified risk area and the Organization’s supply area.



*INTENT:* The intent of this mitigation option is to implement actions that will result in changes to on-the-ground forest management activities that improve maintenance or enhancement of Cape Fear Arch biodiversity, and thereby mitigate the risk of sourcing materials from sites where the concentration of biodiversity in the specified risk area is threatened by forest management activities.

<b>Examples of Acceptable Mitigation</b>
Implement as indicated in the above Mitigation Option. No additional guidance deemed necessary.
<b>Examples of Mitigation that is <u>Not</u> Acceptable at Any Level</b>
Development and implementation of an action plan that does not have any impact within your supply area or the Cape Fear Arch CBA.
Development and implementation of an action plan that is opposed by the Cape Fear Arch Conservation Collaboration.
Development and implementation of an action plan that does not address any of the challenges or opportunities identified during the Cape Fear Arch Conservation Collaboration meetings.