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Issue Overview: FSC US Regions & Regional Requirements

*To Support Public Consultation of the Forest Stewardship Council U.S.
National Forest Stewardship Standard (NFSS)*

October 5, 2020

Introduction

The Forest Stewardship Council U.S. (FSC US) developed this issue overview to support stakeholders who are interested in participating in the public consultation on Draft 1 of the revised FSC National Forest Stewardship Standard for the conterminous United States.

As the world's most trusted forest certification system, the existing FSC US Forest Management Standard offers a solid foundation for the current revision process. The issue overview is intended to facilitate actionable, informed input as FSC works to further refine Draft 2 of the revised Standard.

Ultimately the revision process is about identifying the appropriate balance between an existing "best-in-class" standard that is practical and achievable, with targeted refinements to streamline the Standard where possible, and incorporate changes that bring it into alignment with FSC Principles and Criteria Version 5, as approved by FSC's membership.

Summary

Since 2010, the FSC US Forest Management Standard has maintained remnants of the preceding FSC US regional standards in two annexes focused on even-aged silviculture and streamside/riparian management zones. One of the priorities for the current standard revision process was to eliminate these annexes, thereby increasing transparency regarding expectations for organizations seeking FSC certification in FSC US regions with specific requirements.

Extensive discussions at multiple stages in the revision process concluded that any substantive change to the regional requirements must be driven by an in-depth review of the scientific literature regarding the impact of harvest openings, retention of live vegetation, and width of and activities within streamside/riparian management zones, including how these vary by ecological contexts. Completion of this kind of comprehensive assessment will be a priority for FSC US in advance of the next cycle of Standard review and revision (in preparation for Version 3 of the standard), to confirm the need for, and adjust as appropriate, the regional requirements.

Therefore, Draft 1 of the revised Standard Version 2 retains regional requirements, although they have been embedded within the main body of the standard. Elements that duplicate other parts of the standard have been removed and the regional requirements have been streamlined to the extent possible. The technical advisors and the Standard Development Group also worked to increase the feasibility for certified organizations to develop rationale for exceptions to the regional supplementary requirements, when ecologically justified and supported by experts. And while primarily focused on encouraging longer rotation lengths, a new indicator provides additional flexibility in opening sizes.

The existing boundaries of FSC US Regions are based on a mix of ecological and geopolitical divisions, but generally represent the broad ecological regions of the US. While the boundaries are proposed to change little from the existing boundaries, the Standard Development Group is requesting input on some considerations (see below). The one change incorporated into Draft 1 of the standard is in the Appalachian region, where the northern boundary has been adjusted to align with an ecological boundary (per Cleland et al. 2007), instead of the northern state boundary of Pennsylvania. The planned future comprehensive assessment of regional requirements could result in more substantive changes, but this would not occur until the next revision cycle.

Find it in the Standard

- Indicator 6.6.3 includes a regional supplementary requirement for the Southwest Region.
- Regional supplementary requirements for even-aged management are associated with Indicator 6.6.5 for the Appalachian, Ozark-Ouachita, Pacific Coast, Mississippi Alluvial Valley Rocky Mountain, Southwest Regions. Additionally, there is supplementary regional guidance for the Southeast Region.
- Regional supplementary requirements for Riparian Management Zones are associated with Indicator 6.7.5 for the Appalachian, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain and Pacific Coast Regions.
- Indicators 6.6.6 and 6.7.6 allow for departures from regional requirements when ecologically justified.
- While primarily focused on encouraging longer rotations, Indicator 6.8.3 provides additional flexibility for exceeding opening size limits in the regional requirements.
- Indicator 10.1.2 includes regional supplementary requirements for the Southwest and Ozark-Ouachita Regions.
- Annex B includes a map of the FSC US Regions.

Rationale

The timeframe and resources for the revision process did not support a full scientific review of the current regional requirements. However, the relocation and revisions to the regional requirements increase transparency, clarity and consistency, while streamlining these supplementary indicators. Additionally, further revisions increased flexibility for Certificate Holders to deviate from the regional requirements when the best-available information supports a different approach or when improved or equivalent environmental outcomes can be proven. While this approach does not completely eliminate the regional requirements as some participants would have preferred, the Standard Development Group believes that it represents a positive change.

A small number of more substantive changes to regional requirements were made, predominantly to provide flexibility for the broad range of contexts and restoration needs within a particular region.

Substantive regional boundary changes will generally need to be aligned with any changes that may be proposed to the regional requirements in the future, and as such, are not proposed at this time.

Impacts of the revision

Indicators from regional annexes were transferred into the main body of the Standard. The changes to these indicators were primarily limited to streamlining, reducing duplication, and

increasing consistency, while edits to other indicators increase the feasibility of justifying exceptions to the regional requirements.

The revised regional supplementary requirements for even-aged silviculture in the Appalachian Region remove the normative prohibition on harvest openings greater than 10 acres without retention. This is replaced by guidance suggesting that the average size of harvest openings without retention not exceed 10 acres in a given year and that no single opening without retention exceed 25 acres.

The revised guidance for even-aged silviculture in the Southeast Region no longer references any specific opening sizes for natural forests and semi-natural forests.

Certified organizations with forests north of the revised northern boundary of the Appalachian Region, and south of the former boundary along the Pennsylvania state border (i.e., now in the Northeastern Region), will no longer have any regional requirements and will only need to follow the requirements in the base indicators.

Key questions for public consultation

- Have the regional requirements been appropriately addressed in the Draft 1 revised standard?
- Will the changes result in indicators that are feasible for certified organizations?

As noted above, the current FSC US Forest Management Standard (Version 1) includes regionally specific requirements that focus on unique forest types found across nine regions including the Pacific Coast Region and Rocky Mountain Region. The Standard Development Group understands the need for requirements that support the unique needs of diverse forest types. The Standard Development Group is interested in better understanding situations where requirements designed for the Pacific Coast Region may be too restrictive for dry forest ecosystems.

- Would your organization or others you know of be interested in getting or supporting FSC certification within dry forest zones if the standard were more tailored to these forest ecosystems?
- Do you see a need to adapt the standards for the Pacific Northwest dry zone? If so, how would you suggest the standard change to be more tailored to dry forest zone ecology?

The Ozark-Ouachita Region was originally established to identify an area that was perceived to be ecologically and topographically different from surrounding areas. However, some input suggests that the two subregions included within the region (the northern Ozark subregion and the southern Ouachita subregion) are ecologically and topographically different from each other and may be more similar to other regions than to each other. Which of the following options is the best approach for the Ozark-Ouachita Region?

- a. Remain as it is with two subregions that have different requirements
- b. Merge the two subregions
- c. Merge the Ouachita subregion with the Southeast Region but maintain the Ozark subregion as a separate FSC US Region
- d. Merge the northern portion with the Appalachian Region and the southern portion with the Southeast Region (following [Cleland et al. 2007](#)).
- e. Merge the northern portion with the Great Lakes Region and the southern portion with the Southeast Region (following [Bailey 1994](#)).

How to provide input

Individuals who are interested in participating in first phase of the public consultation on Draft 1 of the revised FSC US National Forest Stewardship Standard are encouraged to [visit the web pages dedicated to the consultation](#). Within these web pages, participants will find the draft revised standard, plus additional resource materials, learn about opportunities to participate in webinars, and how to submit comments on the draft.

Any comments that a participant wishes to be formally recognized must be submitted via the FSC Consultations Platform by Friday, December 18, 2020.