



Working Discussion Document **Potential Criteria for Evaluating Draft Mitigation Options**

(Updated Post-Portland Meeting)

The following potential working criteria and mitigation concepts were offered by FSC in the August 2018 Portland meeting as a possible basis of discussion for stakeholder consultation and outreach. The intention was to expand and refine our collective thinking, not to limit it. Input on mitigation criteria will serve as a basis for further regional consultations. Input on mitigation options will be used as a basis for ongoing decision-making about preferred mitigation options.

GREEN highlight is used to indicate input received during plenary sessions in Portland.

YELLOW highlight is used to indicate input that seemed to resonate particularly well.

CH: Certificate Holder

POTENTIAL MITIGATION CRITERIA

(No priority intended by numbers, just for reference)

1. For each mitigation option, at least one of the following applies:
 - a. Results in decreased negative impact(s) and/or increased positive impacts from forest management activities within the specified risk area
 - b. Improves knowledge about places where the conservation value is being threatened within the specified risk area so that those places can be avoided or mitigated
 - c. Supports an ongoing initiative/program that is already producing positive outcomes within the specified risk area
 - d. Supports implementation of actions within the specified risk area identified through multi-stakeholder planning processes (e.g., State Wildlife Action Plans, regional conservation plans, Federal recovery plans)
2. For each mitigation option, all of the following apply:
 - a. Proven or a reasonable expectation of effectiveness in maintaining or enhancing the conservation value within the specified risk area
 - b. Passes through topline filters of efficacy, clarity, efficiency, practicality, measurability and auditability
 - c. Doesn't require companies to make extensive investments to infrastructure (relative to size of the operation; some investment should be expected)
3. For the set of mitigation options, all of the following apply:
 - a. Provides a workable option for all enterprises, specifically including small enterprises
 - b. Doesn't require certificate holders to have knowledge of specific sites from which their forest materials originate, in situations where the procurement processes and/or antitrust concerns make this information inaccessible.
 - c. Differentiates requirements between companies that buy directly from the forest, and those that don't

***** Among these criteria, please kindly mark up doc in terms of: what resonates (+) / needs clarification (-) and / or strengthening? (Δ)**

Resonates (+)

- #s 2b, 3b, 3c resonate
- Entire thing – huge improvement

Needs Clarification (-)

- 2c – Can we use a different word than ‘infrastructure’ such as ‘human and financial resources’ or ‘infrastructure/resources’ ?
- 2c – Need clarification on the implication of this phrase
 - Is this above and beyond current? Even more required? That causes heartburn
 - Some investment or action is needed, want additionality, but not dictating what
 - Need to recognize that investment is a combined thing; to be successful, it needs to includes CH and stakeholders looking for common solutions
 - This is integrated problem solving – and as a result there is an expectation that additional ‘investment’ is required across chambers in order to come up with long term integrated solutions
 - Part of what will drive the ‘validity’ of mitigation actions is engagement from all three chamber perspectives
- 1c & 1d – What does the word ‘supports’ mean?
- 1b – Is this really a mitigation option on its own? Should it be this AND something else? Different opinions on this one – some believe that this is adequate on its own as a mitigation option, because stakeholders are uniquely qualified to inform public agency, personal and consumers about these values and how management impacts or protects them.
- 3b – This may represent much of the reason that many environmental organizations do not want to be part of this process; this lack of knowledge may damage confidence in FSC claims

Needs Strengthening (Δ)

- 1b – After the word “where,” add “and how”
- 2a – Need clarification on HOW an ‘expectation of effectiveness’ is documented
- 3a – “Yes” to workable options, but why call out small enterprises and not large ones who also have their own unique issues; perhaps it’s more important to call out where in supply chain the company exists than its actual size?
- 1c – “Supports an ongoing initiative/program that is already producing VERIFIABLE positive outcomes....”
- 1 – Add an additional bullet under #1? “Provide the best available knowledge to those who are best able to take action”
- 1c – Not just ‘ongoing’ but also new/innovative
- 1b – Not ‘can be’ but ‘will be’ or ‘are’
- 1d – Not ‘multi-stakeholder’ but ‘diverse-stakeholder’

Forest Conversion - key dynamics to consider:

- ❖ Overall in the US, the rates of forest loss are very low – with forest losses being balanced by forest gains at national and regional scales. However, at finer scales, forest conversion is occurring, primarily driven by urban development.
- ❖ Mitigation options to address forest must help to achieve one of the following outcomes (drawn from the USFS Open Space Conservation Strategy):
 - A. Convene partners to identify and protect priority forest areas
 - B. Promote national policies and markets to help private landowners conserve forests
 - C. Provide resources and tools to help communities expand and connect forests
 - D. Participate in community growth planning to reduce ecological impacts and wildfire risks

POTENTIAL Mitigation actions suggested to date through focus group and public consultation regarding Forest Conversion:

- Educate landowners about tax relief programs, succession planning, etc. to encourage keeping forests as forests. [Outcome C?]
- Support regional efforts to educate landowners as to the value-enhancing alternatives of maintaining forestland over conversion. [Outcome C?]
- Grow healthy and competitive markets that motivate landowners to manage their forests in ways that benefit the environment and maintain forestland (e.g., support economic development, sawmill expansion, pulpwood expansion) [Outcome B]
- Actively participate in regional planning processes (land use and/or sustainable forestry) to support policies aimed at limiting conversion. [Outcomes A&D]
- Support organizations which address conversion but who do not permanently lock up forests in conservation easements. [Outcome A]
- Community forest model: Communities would benefit from pro-bono work related to harvest planning, or purchase commitments for wood when restoration or commercial harvests occur (as opposed to conversion). [Outcome B]
- Participation in pooled advocacy programs promoting wood and fiber markets, such as the USDA check-offs, as a way to establish rewards for owning forests (instead of converting them) [Outcome B]

Forest Conversion Top-Line Input

Resonates (+)

- Landowner education and support regional programs – first 2 bullets
- Participation in regional planning processes
- FSC, members, CHs need to promote markets
- Financial incentives – keeping forests as forests

Needs Clarification (-)

- Who is going to do the outreach education? Need clarity on this.
- What does 'address' mean? Halt? Stop?

- What does 'support' mean? Is it financial? Providing staff and resources? Providing education content? And what is the level of support that different CHs need to provide? How is this auditable?

Needs Strengthening (Δ)

- Interest, but also confusion, in the community forest model – what is it?
- Land Trusts & conservation easements – these may not be supported by all participants, but they should be seriously considered as an option due to strong support from the environmental perspective
- Community Forests – more can be done beyond pro-bono assistance
- Pooled efforts, not just individuals, need to be emphasized; it would be more effective to pool our efforts through coordination by FSC US(?) or other organizations that are already doing this work and could use support – pooled energy, resources, time, etc.
- Who decides and how do we decide which is the right organization?
- Collaboration across environmental organizations and CHs, cross-chamber engagement – this is important to success

Old Growth – key dynamics to consider:

- ❖ Old growth forests are important in maintaining biodiversity, values for society, and ecological services such as carbon sequestration and soil quality.
- ❖ There is no single, widely accepted definition, but this assessment uses the definitions of Type 1 and Type 2 Old Growth in the FSC US Forest Management Standard.
- ❖ Old growth forest is generally considered to be rare, but how rare depends on the part of the country being considered – generally, they are much less common in the eastern U.S., but those that exist are generally on public land and in some kind of protective designation, or inaccessible for forest management.
- ❖ Timber harvest (including post-wildfire harvest) continues to threaten Old Growth areas in the Pacific Coast and Rocky Mountain regions. The Northwest Forest Plan has significantly reduced harvests within Old Growth on Federally-managed plans, but recent reviews indicate it still occurs. Status assessments for species that are dependent upon late successional forests suggests that habitat losses continue on private lands.

POTENTIAL Mitigation actions suggested to date in conversations with technical experts regarding Old Growth and through public consultation:

- Support development and implementation of regulatory policy that requires landowners to declare and map any old growth on their lands.
- Educate landowners and land managers that late successional forest is important whether it has burned or not.
- Work to expand the mapping efforts completed by the USFS PNW Research Station for the Northwest Forest Plan.
- Promote conservation planning for endangered species that are late-successional dependent (Intent: if habitat is being managed for the species, then it likely will not be lost to/degraded by forest management)
- Produce / distribute educational communication to suppliers / landowners which includes information on identification of old growth forests, management of existing old growth

forests, and proper management of young forests with a goal of developing more old growth forests.

- Active participation in federal resource planning processes to encourage protection of existing identified primary forest.
- Annual staff training to increase knowledge about identification, ecological function, and silvicultural techniques to maintain/develop late-successional functions and structural complexity.

Old-Growth Forest Top-Line Input

Resonates (+)

- Education and outreach – with the need to tailor to where the CH is in the supply chain
- Mapping, but only if combined with education and outreach
- Participate in conservation planning for species or resource planning with the federal government, states, or other entities
- Fundamental gap in understanding of old growth – we need to understand what needs management and what needs to be left alone; different types of forest need different management approaches

Needs Clarification (-)

- Mapping - what's the anticipated impact from a requirement for landowners to map old growth?
- Mapping - Could lead us down a slippery slope – concern about showing where it is located; could this have unintended consequences and encourage harvests instead of protecting it?
- Staff training – who? How? What?
- What is the direct impact of education – is this really an effective mitigation action? Needs more clarification on what the information would be
- Don't want FSC to become a regulatory organization
- Need to clarify definitions and qualifiers (Old Growth vs Late Successional vs Primary Forest; 'supports')

Needs Strengthening (Δ)

- Focus on conservation of old-growth, not just protection (particularly through federal planning activities)
- Outreach and education and focus on landowner engagement
- Recognize old growth that needs management vs old growth that doesn't need management; one size does not fit all – mitigation needs to be flexible and adaptable to recognize the different types of forests
- How do we put in place a protocol that prevents the harvest of older trees? Age limit? Would it be possible or have an impact on conserving old growth?
- Concern about landowners that see these trees as an investment, which we could be taking away
- Need a protocol? A practical and auditable way to prevent old growth from entering FSC supply chains
- Old growth trees vs old growth stands – National Risk Assessment is about the stand scale
- Active engagement in planning on timber harvest projects and auditing the engagement – with the goal to inform the landowners

- Frequent fires are resulting in forest conversion, with resulting climate change impacts
- Proposed actions: Ensuring that decision makers (public) have accurate and most up to date information, both at a high level conceptual scale and site specific scale to ensure they make the best decision possible; advocate for active engagement of these decision makers in the planning and environmental analysis, and that the planning and environmental analysis are based on the best scientific information and will create functional Type 1 and Type 2 old growth forests in the future
- Dr Franklin: If the old growth area was not historically subject to frequent fire, you can draw a line around it and walk away. In dry forest, the focus should be on retention of old trees – not just keep them, but enhance their survival through management of fuel within the stand, in order to restore (in dry forests) the stand’s resistance to fire. This would be achieved by excluding logs of 150+ years age from use by CH.
 - Is there a difference in desired response due to intensity of fire? (low/mod vs high intensity?) This gets into the question of salvage. Dr. Franklin’s response: This again needs to be differentiated by moist vs dry – there is no credible argument against not salvaging burned OG on in moist areas. However, on dry sites, while you need to leave structure behind (similar to what would leave following a ‘green tree’ harvest), removing excessive fuels that are extraneous to the above is not going to have a negative impact and may be considered ‘natural.’
 - By definition, Type 1 is a non-renewable resource – it is not possible to ‘create’ Type 1 (and therefore it should and does have special protections). Therefore, salvage in a Type 1 forest would negate its High Conservation Value (HCV) status. FSC response: agreement
 - If the goal is to remove build-up of small trees, and active management is required for this, does that negate the Type 1 status? Could argue that fire suppression has negated ALL Type 1 OG in the US.

~ TOP-LINE INPUT FOR REMAINING ISSUES WAS PROVIDED VIA POST-IT ~

Central California Critical Biodiversity Area – key dynamics to consider:

- ❖ The California Floristic Province is recognized as a globally significant center of biodiversity. This CBA includes two general ecological regions that both support high levels of biodiversity – the higher elevation Sierra Nevada mountains and the lower elevation California coastal region. The focus of the mitigation effort is the Sierra Nevada, as threats from forest management are unlikely in non-forested areas.
- ❖ The Sierra Nevada hosts a wide variety of biodiversity including hundreds of vertebrates, rare species, and endemic plants. Biodiversity in the forested areas of this part of the California Floristic Province is dependent on a diversity of stand types and ages, including tree species diversity, forest openings, and standing and downed woody structure. The embedded Montane Meadows are particularly important, as the most biologically diverse ecosystem in the Sierra Nevada.
- ❖ The predominant threat from forest management activities is due to forest simplification – simplification of both the diversity of tree species and the structure of the forests. Additionally, road construction for forest management can impair Montane meadows.

POTENTIAL Mitigation actions suggested to date in conversations with technical experts regarding the Sierra Nevada region and through public consultation:

- Work with landowners and land managers to increase awareness of the environmental value of Montane meadows, and the importance of maintaining them (particularly riparian areas within them).
- Work with landowners and land managers to establish, implement and monitor best management practices for snag, large tree, and hardwood retention.
- Work to revise the Forest Practice Rules to include explicit minimums for snag and large tree retention within planned harvest units.
- Participate in and support collaborative working groups and planning within the region that promote forest management that maintains and enhances the biodiversity of the region.
- Influence suppliers that are land managers to implement best management practices that maintain or enhance the biodiversity of mixed conifer stands.
- Conduct training for foresters to cover topics such as management of mixed conifer stands to avoid loss of diversity, montane meadow management, invasive species, and other threats.
- Produce / distribute educational communications to suppliers / landowners which includes information on management of mixed conifer stands to avoid loss of diversity, montane meadow management, invasive species, and other threats.

Klamath-Siskiyou Critical Biodiversity Area – key dynamics to consider:

- ❖ The biodiversity in the Klamath-Siskiyou ecoregion is driven by geologic, topographic, and climatic complexity and history. The region was not covered by glaciers during recent ice ages, and provided a refuge for many species that did not survive elsewhere. Additionally, the diversity in the geophysical landscapes has resulted in many unique combinations of characteristics in different places that promote a diversity of forest and other ecosystem types, and unique species for those unique places. The forest-based biodiversity in the Klamath-Siskiyou is largely sustained in diverse mixed evergreen stands that are adapted to fire.
- ❖ Reported threats to forest ecosystems from forest management activities include structural changes due to conversion to forest stands that have a single dominant species (as opposed to the high diversity of tree species that would most likely occur naturally, and supports the concentration of biodiversity in this area), incompatible harvest practices that degrade habitats and loss of the full representation of forest successional stages at all elevations.

POTENTIAL Mitigation actions suggested to date in communications with technical experts regarding the Klamath-Siskiyou region and through public consultation:

- Support and/or collaborate with the University of California Cooperative Extension to provide educational information to landowners, foresters and loggers; ensure that these kinds of individuals understand that the supply chain desires for sustainable forest materials.
- Collaborate with organizations like the California Licensed Foresters Association, Forest Stewards Guild, California Licensed Timber Operators and local chambers of the Society

of American Foresters on service delivery and information dissemination to share information about best practices that will help to maintain or enhance the biodiversity of the region.

- Work with local land conservancies to support establishment of working lands easements.
- Support the efforts of The Watershed Research and Training Center, University of California Cooperative Extension and others to build prescribed fire in the region through the Northern California Prescribed Fire Council, or other forums.
- Improve/promote/support/develop/encourage educational outreach materials to increase knowledge about the high-diversity fine scale habitats found in the Klamath-Siskiyou CBA.

Lesser Slender Salamander - key dynamics to consider:

- ❖ The Lesser Slender Salamander's distribution is restricted to the southern Santa Lucia Range of north-central San Luis Obispo County, CA, generally above 400m. The species is considered to have been common historically, but are now more difficult to find. No specific cause for this decline has been identified. The species was only fairly recently identified as being separate from other similar salamander species (via DNA analysis) in 2001.
- ❖ This species appears to be associated with forests of mixed oak, tanbark oak, sycamore and laurel, and may have an affinity for poison oak. They are typically found in areas either with higher elevation or that are more mesic than other sites near their location. Frequently, these are in mesic canyons, where the individuals are found on shaded slopes in deep leaf litter. They are always found in areas that also include black-bellied slender salamanders, but only occur in a small portion of this other species' range.
- ❖ Little is known about this salamander and specific threats to the species have not yet been documented. The species depends on forest habitat; canopy shading, moisture level and down woody debris appear to be important habitat elements, which can all be affected by forest management and potentially cause negative impacts.

POTENTIAL Mitigation actions suggested by conversations with technical experts for the Lesser Slender Salamander:

- Invest in research to improve knowledge of species distribution, abundance, trends, other population characteristics, threats and best management practices.
- Map the species range/distribution and land ownership (with clear indication of public vs private fee ownership and known existing conservation easements) and use to promote needed conservation actions.