The following document summarizes the input received during and immediately following the 2018 Controlled Wood Regional Meetings and provides rationale for the resulting mitigation options for the Central Appalachian Critical Biodiversity Area (CBA), along with definition of any identified gaps in the final set of options.

**Please note that any of the proposed mitigation options may be done individually or in collaboration with other certificate holders, or other entities that have similar desired outcomes. Collaboration is encouraged to scale up potential mitigation impact, and FSC US will seek to assist with that collaboration when feasible.**

**CENTRAL THEME: Education & Outreach**

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| --- | --- |
| Original Proposed Option(#4) Improve logger education to increase the implementation of forestry BMPs | Topline Input* Across the board support for this mitigation approach
* Doesn’t have to be direct outreach, could be support of others who do it
* Not just loggers, should also include forest managers and landowners, particularly small ones
* Continue existing logger education, and need to build on it to improve
* Not just steep slopes, also preventing siltation and other practices needed to conserve aquatic biodiversity
* Some questions regarding sufficiency of this as a mitigation option
* Not a ‘one-off’ option, must be ongoing
* Include information on appropriate equipment/techniques to use in areas important for aquatic biodiversity conservation
 |

*Consultation Insights: This was, by far, the most supported option from all perspectives. Some input expressed concern that as originally written, it would not be sufficient as a mitigation action. Comments suggested that there is a need to be specific and focus the revised option on practices that will conserve aquatic biodiversity, including but not limited to practices for steep slopes and for reducing siltation. Input consistently noted that audiences should include not just loggers, but also forest managers and landowners, particularly smaller family forest owners, and that collaborative approaches and partnerships may be particularly effective on this front. Specifically regarding logger education, comments suggested that there is a need to recognize that the mitigation implemented should be about continuing the education and improving existing programs. Several comments also noted that the focus should be not just on increasing implementation of BMPs, but also improving implementation of practices for the conservation of aquatic biodiversity.*

**Proposed Revised Mitigation Option**

**The following is offered as an option that could be scaled for any impact level:**

**Using materials (as described below), and with a desired outcome of increasing and improving Best Management Practice (BMP) implementation that focuses on aquatic biodiversity conservation within the specified risk area and the Organization’s supply area, communicate to audiences (as described below) the values of aquatic biodiversity, threats from poorly implemented forest management, and management practices that will reduce or eliminate these threats, including but not limited to practices for management activities on steep slopes, and practices that will prevent siltation.**

* **Materials: Developed by, or developed in cooperation with, organizations/individuals with expertise in aquatic biodiversity conservation, or FSC US, and delivered in a manner that will be the most effective in achieving the desired outcome of increasing and improving BMP implementation that focuses on aquatic biodiversity conservation, while reflecting the specific context and characteristics of the Organization.**
* **Audiences: Audiences will reflect the specific context and characteristics of the Organization, but communications should be directed toward those audiences where the communications will be most effective in helping to achieve the desired outcome of increasing and improving BMP implementation that focuses on aquatic biodiversity conservation within the specified risk area and the Organization’s supply area in conservation of aquatic biodiversity. Depending upon the Organization’s location in the supply chain, communications may be directly with loggers, land managers or landowners responsible for the management activities implemented, or through intermediaries such as community members, forest managers, suppliers, forestry associations, landowner associations, or in collaboration with organizations/individuals already working with the same desired outcome.**

**CENTRAL THEME: Research & Mapping**

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| Original Proposed Options(#3) Use of Blue Ridge Forever conservation value viewer to identify areas of greater risk, and establish a mitigation bank in those areas with ‘forest conservation credits’(#6) Support research into the effectiveness of forestry BMPs related to steep slope logging techniques; followed by efforts to adapt the BMPs if/as indicated by the results | Topline Input* Mixed responses to options as written, but support for research generally
* Should not be specifically focused on one source of information
* Develop criteria and assess landscape scale high priority sites, not necessarily with the Blue Ridge Forever tool; could use keystone species or other proxies
* Good to get new/better information about risk, but there must be an action associated with it
* Assess effectiveness of BMPs for conserving aquatic biodiversity, not limited to steep slope techniques
* BMPs already shown to be effective for water quality
 |

*Consultation Insights: Responses indicate that there is a perception that the risk is not consistent throughout the specified risk area as currently defined, and that the mitigation options would be most effective if implemented in areas where the risk is greater. There were a lot of comments that noted that the effectiveness of BMPs has already been established, and this is true for the purpose for which they were originally developed – to comply with the Clean Water Act, but this does not necessarily mean that they are effective for protecting biodiversity. There was one suggestion that some research on this question has already been done in Vermont, and should be used as a starting point. Both original options are identified as being too narrow, that the Blue Ridge Forever tool is not the only source of information that could be used for mapping, and that research into effectiveness of BMPs should not be limited to steep slope techniques. Neither of these forms of research on their own effectively mitigates the risk of sourcing from places where the forest management activities are threatening aquatic biodiversity, and therefore there must be another action linked with the research option.*

**Proposed Revised Mitigation Option**

**The following is offered as a two-part option for ‘High Impact’ organizations:**

1. **Engage with and/or provide monetary or in-kind resources to an entity or alliance that is currently conducting, or has the capacity to initiate, research on effectiveness of Best Management Practices (BMPs) for conserving aquatic biodiversity, or identifying landscapes within the specified risk area and the Organization’s supply area that include forests where there is higher level of the identified risk; and**
2. **If research on effectiveness of BMPs, advocate for changes to state BMPs that reflect the results of the research, or if mapping of higher risk areas, use the results of the research to improve implementation of another mitigation option.**

**CENTRAL THEME: Conservation Initiatives**

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| Original Proposed Options(#1) Contribute to a local land trust(#2) Establishment of a fund that will help to defray the cost of conservation easements that include increased width buffers and harvest/ management plan review prior to forest harvest (could be set up to target specific landowners as desired by the company) | Topline Input* Concern around easements, and generally reducing the land base of working forests
* Focus on monetary donations and funds is not practical or feasible
* Build on existing initiatives that are conserving aquatic biodiversity
* Not just buffer widths
* Mitigation should focus on places where there is highest risk
* There need to be strings attached to any donations
* Consider focusing resource support through FSC, or creating coalitions with other organizations to foster action on biodiversity
 |

*Consultation Insights:* There was mixed support for these two options, but much of it was direct to the lack of specificity in the first option and the overly specific action (establish a fund) in the second. However, a lot of written comments suggested different methods for supporting organizations and activities that are effectively conserving aquatic biodiversity (including economic incentives and other conservation initiatives). And while limited, there was also some support for working forest easements that include specific requirements for practices that will protect aquatic biodiversity. Many suggestions focused on the need to try and work collaboratively to increase the impact of implemented mitigation.

**Proposed Revised Mitigation Option**

**The following is offered as an option that could be scaled for any impact level:**

**Engage with and/or provide monetary or in-kind resources to conservation organizations or similar entities that are supporting or promoting programs or projects to develop new or augment existing programs that will: 1) result in increased and improved implementation of Best Management Practices (BMPs) with a focus on aquatic biodiversity conservation; or 2) result in increased access to incentive programs for landowner who restore, maintain or enhance forests within the specified risk area and the Organization’s supply area in a way that will conserve aquatic conservation, with a particular focus on forests within areas of the specified risk area identified as having higher risk. These entities may include: non-governmental organizations that have active programs/projects to conserve aquatic biodiversity or the forests important for doing so; and/or federal, state and/or local governmental organizations.**

**CENTRAL THEME: BMP Enforcement/Monitoring**

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| Original Proposed Option(#5) Influence state policy to introduce more severe consequences for lack of BMP implementation, in states with lower implementation rates | Topline Input* There are already consequences for those who adversely affect water quality
* Better to support increased funding of state agencies so they can increase their enforcement and/or monitoring activities
* Focus on increasing monitoring instead of enforcement
* States already have a valid system of notification of BMP implementation and outcomes
* Time consuming with limited effectiveness
 |

*Consultation Insights: Input indicates minimal support for the action as written, with numerous recommended edits that suggest a preference for actions that represent ‘carrots’ over ‘sticks.’ While there was a willingness indicated to consider advocacy for increasing state funding for monitoring in particular, some comments questioned the effectiveness of this approach. There were, however, a number of suggestions for how Organizations could assist with increasing reporting of Best Management Practice (BMP) implementation outside of a state agency’s own efforts, and one of these is provided as a revised option below.*

**Proposed Revised Mitigation Option**

**The following is offered as an option for ‘high impact’ organizations:**

**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 system. This program or process would require independent auditing or sufficient auditing by the state to confirm accuracy of voluntary data regarding BMP implementation and allow the State to demonstrate a very high level of compliance with BMPs, particularly those that address practices for steep slopes and prevention of siltation, throughout the specified risk area and the Organization’s supply area and, therefore, demonstrate a low risk of the Organization receiving supplies from areas where the aquatic biodiversity was threatened by forest management activities.**

**CENTRAL THEME: Harvest Equipment**

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| Original Proposed Options(#7) Invest in harvesting equipment that is more appropriate for harvesting on steep slopes (e.g. aerial cable yarding)(#8) Create a fund that provides capital assistance for contractors to purchase more advanced technology | Topline Input* Not supported
* Anything that is focused on money is generally negative
* Unaffordable and impractical
* Increasing access to equipment that will facilitate creek crossings not a bad idea, but this is not the way
* Could be an ethical issue – could be seen as bribery by international companies
 |

*Consultation Insights: There was some recognition that improving access to bridge mats and portable bridges for loggers would be positive, but overall feedback was consistently negative on both of these options, from all perspectives. Therefore, neither option is included in the revised set of mitigation options.*

**CENTRAL THEME: Direct Influence**

*Consultation Insights: Throughout the discussions at the Regional Meeting and in written comments, there were a number of suggestions for mitigation options that aligned with the Shared Criteria, if implemented by Organizations near the beginning of the supply chain. Organizations who are close to the forest are in a unique situation that may allow for greater influence on the forest management activities that occur at the supply sites of their materials. The following represent these suggestions.*

**Proposed Mitigation Options**

**The following are offered as options for Organizations that purchase directly from the source forest, or with suppliers that do so:**

1. **Engage with a conservation organization or similar entities, or FSC US, to identify landscapes of particular concern related to the risk of receiving non-certified supplies from areas where aquatic biodiversity are threatened by forest management activities, and then communicate this information to suppliers, along with: 1) recommended Best Management Practices that will conserve aquatic biodiversity; and 2) contact information for organizations that may be interested in working with the landowner on conserving the forest in question in a manner that will continue to conserve the aquatic biodiversity.**
2. **Document acceptable implementation of Best Management Practices that conserve aquatic biodiversity for harvests that produce non-certified materials that will be controlled by the Organization.**
3. **Include Best Management Practices that will conserve aquatic biodiversity in harvest plans and/or in contracts made with loggers for harvests that produce non-certified materials that will be controlled by the Organization.**

**GAPS IN THE SET OF MITIGATON OPTIONS**

FSC US Staff evaluation of this set of mitigation options, through the lens of the shared criteria, did not identify any significant gaps, with the possible exception of the requirement for 'auditability.' We will be looking to your comments for suggestions on how to address this potential gap, as well as for identification of any other gaps and suggestions for their resolution. Additionally, we will be meeting with Certification Bodies during the consultation and expect that they will also provide input on improvements in auditability.