

FSC Forest Management Pre-Assessment Report

for:

Ohio State Forests System

Managed by Ohio DNR-Division of Forestry

Auditors:
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Date of Field Audit: January 13-14, 2010

Date of Report:

By:

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1. ORGANIZATION BACKGROUND INFORMATION

1.1. Name and Contact Information

Organization Name:	Ohio Department of Natural Resources (ODNR)-Division of Forestry		
Contact for certification:	Chad Sanders - Land Management Adminis	strator	
		Tel:	614-265-6701
Address:	ODNR-Division of Forestry 2045 Morse Road, Bldg H-1	Fax:	614-447-9231
	Columbus, Ohio 43229-6693	Email:	Chad.Sanders@dnr.state. oh.us
		Website:	http://www.dnr.state.oh.us /DivisionofForestryHomep age/tabid/4803/Default.as px

1.2. Scope: Area under Evaluation

PROPOSED SCOPE OF FOREST MANAGEMENT CERTIFICATE		
Type of FM certificate: Single FMU		
Total number of FMUs 1 FMU, divided into 20 "state f		rest" units, totaling more
	than 185,000 acres	_
State Forest Units		Area
Mohican		4,525 acres
Maumee		3,200 acres
Fernwood		3,029 acres
Harrison		1,321 acres
Beaver Creek		1,122 acres
Yellow Creek		756 acres
Sunfish Creek		700 acres
Hocking		9903 acres
Blue Rock		4,579 acres
Perry		4,619 acres
Shade River		2,814 acres
Zaleski		28,255acres
Gifford		320 acres
Tar Hollow		16,320 acres
Scioto Trail		9,390 acres
Richland Furnace		2,503 acres
Pike State Forest		11,960 acres
Brush Creek		13,514 acres
Shawnee		64,146acres
Dean		2,794 acres
Total Area		185,770 acres

Product categories to be included in the scope:		
Types of product: Standing trees, delivered		
logs, and logs concentrated at log		
merchandizing yards		
Other:		

Areas to be excluded from the scope of the certification evaluation

The scope of this Forest Stewardship Council (FSC) pre-assessment included all lands under management of the Ohio Department of Natural Resources-Division of Forestry. These lands collectively constitute the Ohio State Forest System. No lands managed by the Division of Forestry were excluded. The scope of this pre-assessment excluded forest lands managed by other divisions with the Department of Natural Resources, lands with different management mandates than those that apply to the State Forests.

1.3. Forest Management Organization

The Ohio Department of Natural Resources-Division of Forestry manages 20 state forests covering more than 185,000 acres in 21counties, mostly in the Ohio's unglaciated south eastern region. The State Forests of Ohio are organized into 2 districts (north and south) with 11administrative field offices located throughout the state.

Functional activities within the Division are divided into four major program areas: land management, fire, law/recreation, infrastructure/facilities. At present, the ODOF workforce exceeds 70 individuals involved in state forest management.

For this pre-assessment, potential/possible conformity was evaluated against the FSC Draft US National Standard.

1.4. Overview of the Forest and Management System

1.4.1 Location and Size

Location of forests under evaluation	Throughout the State of Ohio
Latitude and longitude:	
Forest zone (select FSC classification)	Temperate hardwoods
Management tenure: (FSC)	Publicly owned
Number of FMO employees:	70+
Number of forest workers working in operation	50
under evaluation.	

Forest Use		
Land Use	Area (acres)	
Production Forest		
Natural forest	160,000	
Plantation		
Conservation/protected Areas	13,000	
Special Management Areas	12,000	
Water	100	

Non-Forest areas	200
Total Area:	185,300

2. PRE-ASSESSMENT PROCESS

2.1. Introduction

Ohio DNR-Division of Forestry retained Scientific Certification Systems (SCS)¹ to conduct a pre-assessment in preparation for seeking Forest Stewardship Council (FSC) certification for the Ohio State Forests located throughout the state but with the largest concentration in Southeastern Ohio. The Division's forest management operations are carried out over an area of more than 185,000 acres in 20 management units contained within 21 Ohio Counties. Selection timber harvesting occurs in approximately 2,500 acres per year, with timber sales averaging 8 million board feet from 25 different sales per year. Prescribed fire activities take place on approximately 1,500 acres each year and regeneration harvesting is practiced on approximately 400 acres per year. The pre-assessment was conducted against the FSC Draft National Standard on the expectation that this standard will be fully accredited (endorsed) by the time that ODNR were to engage in a full certification evaluation.

The goals of a FSC pre-assessment are threefold. First, it is intended to provide Ohio DNR-Division of Forestry with a clear understanding of the requirements for FSC certification. Second, SCS will be able to develop a clear view of Ohio DNR-Division of Forestry's management systems and practices, including information needed to design the main assessment. Third, the pre-assessment is intended to identify areas where Ohio DNR-Division of Forestry's management currently does not appear to be in conformity with the FSC Draft National Standard.

Section 3 of this report provides a summary of the possible major gaps identified during the course of the pre-assessment and a summary of other issues that will need to be examined in detail in a full certification evaluation, in the event that Ohio DNR-Division of Forestry elects to undergo a full evaluation. In addition to the possible gaps and likely non-conformances identified here, there may be additional issues and non-conformances that were not identified during the pre-assessment. SCS has made a significant effort to conduct a thorough pre-assessment, but it is Ohio DNR-Division of Forestry's responsibility to review the standard and certification requirements closely to ensure that they are as prepared as possible to demonstrate conformance with the standard at the time of the main assessment.

2.2. Pre-assessment team and qualifications

Dr. Robert J. Hrubes, Ph.D. – Lead Auditor, Scientific Certification Systems. Dr. Hrubes is a California registered professional forester (#2228) and forest economist with over 30 years of professional experience in both public and public forest management issues. He is the principal architect of the SCS Forest Conservation Program, accredited by the

¹ This FSC pre-assessment was part of a dual FSC/SFI pre-assessment and readiness review. As has been the case with many other dual certification projects on state forestlands, SCS collaborated with NSF-ISR which is a SFI-accredited certification body. SCS subcontracted through NSF-ISR for the conduct of the FSC pre-assessment, as ODNR wished to handle both evaluations through a single contract. In the event that ODNR were to seek and achieve FSC certification, a certification contract would have to be executed directly with SCS.

Forest Stewardship Council since 1995. He is presently Senior Vice-President of Scientific Certification Systems. Dr. Hrubes has served as lead auditor for a large number of SCS Forest Conservation Program certification evaluations of North American public forests, industrial forest ownerships and non-industrial forests, as well as operations in Scandinavia, Chile, Brazil, Papua New Guinea, Japan, Malaysia, Australia and New Zealand. Dr. Hrubes holds graduate degrees in forest economics, econometrics and resource systems management from the University of California-Berkeley and the University of Michigan. His professional forestry degree (B.S.F. with double major in Outdoor Recreation) was awarded from Iowa State University.

Mike Ferrucci, Master of Forestry – Auditor

Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 25 years. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies. Mr. Ferrucci has participated in forest management assessments in 27 states, and has conducted joint FSC-SFI Certification Assessments on over 14 million acres of forestland in the United States. For this project, Mr. Ferrucci functioned as an employee of NSF.

2.3. Pre-Assessment Itinerary

<u>Day 1 Schedule (Group discussions at ODOF Central Office, Columbus)</u>

8-8:45 Introductions and Overview of Audit Protocol

8:45-11 Overview of Ohio State Forest System and management
 11- 1 Inventory & Monitoring, Mgt. Planning (FSC Principles 7 & 8)

• Noon Working Lunch

1-2 FSC Principles 1, 2, 3, 4
 2-3 FSC Principles 5, 6, and 9

• 3-4 SFI Requirements

4-4:30 Audit Planning Considerations4:30 Adjourn; determine dinner location

5:30-7 Dinner with ODNR State Forester and Land Mgt. Administrator

Day 2 Schedule (Field reconnaissance in southern State Forests)

•	7 am	Depart from hotel (Columbus)
•	8 am-11 am	State Tar Hollow State Forest
•	11-12	Travel to second State Forest
•	12-1	Lunch at Scioto Trail State Forest during overview
•	1-3:30	Field sites, Scioto Trail State Forest
•	3:30	Wrap up and transit to Columbus airport
•	5:00	Arrive airport

Sites Visited on Day 2:

Tar Hollow State Forest

Site 1: Coey Hollow Grouse Management Area – completed sanitation/pre-salvage

harvest, merchandizing sale

Site 2: Interview Jason and Tom Perkins, Loggers

Site 3: Interview local firewood cutters

Site 4: Brush Ridge Fire Tower and interpretive signs

Site 5: Prescribed fire program, landscape scale

Site 6: Dullan Hollow - completed shelterwood harvest

Site 7: Boy Scout Camp – group camping area; access road through creek

Scioto Trail State Forest

Site 8: Perkins Wood Products – starting logging clearcut portion in area with heavy mortality

Site 9: Perkins Wood Products – starting logging selection portion

Site 10: Merchandizing Log Yard

Site 11: Scioto Trail State Forest Headquarters and Pesticide Storage Area

Site 12: Old nursery site, completed pre-salvage in 2007

ODNR Personnel Interviewed During the Pre-Assessment

David Lytle, Chief State Forester, ODOF Nate Kirk, State Forests Administrator, ODOF Chad Sanders - Land Management Administrator, ODOF Bob Boyles, Southern District Forest Manager, ODOF Gregg Maxfield, Northern District Forest Manager, ODOF Andy Sabula, Forest Industries Forester, ODOF Mike Bowden, Fire Program Coordinator, ODOF Greg Guess, Southern District Land Management Coordinator, ODOF Greg Smith, Information and Education, ODOF Tom Shuman, Zaleski State Forest, ODOF Dick Lusk, Law Enforcement/Recreation, ODOF Bill Stanley, The Nature Conservancy Jennifer Windus, Wildlife Program Administrator, Ohio Division of Wildlife Dan Yaussy, US Forest Service, Northern Research Station Brian Kelly, Forest Manager, ODOF Dan Balsar, Forest Health Program, ODOF

2.4. Certification Standard Employed in this Pre-Assessment

The pre-assessment was conducted against the FSC-US National Forest Management Standard Draft 8.1 submitted by FSC-US November 23, 2009 to FSC-IC for approval. (It is expected that this national standard will be formally accredited by FSC-IC by the second quarter of 2010.)

2.5. Stakeholder Notification and Consultation Process

The purpose of the stakeholder consultation strategy for this pre-assessment was twofold:

- 1) To ensure that the public was aware of, and informed about, the preassessment process and its objectives; and
- 2) To assist the field pre-assessment team in identifying potential issues of concern.

This process was not just stakeholder notification, but wherever possible, used to obtain detailed and meaningful stakeholder interaction. The process of stakeholder interaction did not stop after the pre-assessment visit. SCS welcomed, at any time, comments on Ohio DNR-Division of Forestry operations and such comments often provide a basis for specific aspects related to a potential future assessment of Ohio DNR-Division of Forestry.

Prior to the field component of the pre-assessment, a public notification document was developed by SCS and broadly distributed by e-mail during the week of December 20, 2009. The e-mail notices alerted stakeholders to the pending pre-assessment. SCS distributed the notification to individuals and organizations in the Ohio area. Ohio DNR-Division of Forestry also provided a stakeholder list to SCS, and the notification was sent to these individuals and organizations on December 20, 2009. The Ohio DNR-Division of Forestry list, combined with an expanded list received by the pre-assessment team on January 20th, also provided a basis for the team to select people for interviews (in person, by telephone, or through e-mail). Additional stakeholders were also identified during the on-site pre-assessment. In the event that a full evaluation is conducted, these and other stakeholders will be contacted by the full evaluation audit team.

In response to the public notice announcing the pre-assessment, a relatively small but active number of stakeholders did respond in the form of emails and phone calls. The SCS Director of FM Certification, Dave Wager, took the lead in interacting with these stakeholders and providing the audit team with detailed summaries of input that was received.

3. PRE-ASSESSMENT RESULTS

This Section provides the SCS audit team's findings. These findings are presented as a summary of possible gaps/deficiencies relative to the FSC Principles and Criteria as further elaborated by Indicators, the three hierarchically constituting the FSC US National Forest Management Standard, Draft 8.1.

Pre-assessments, by their very nature, are not definitive determinations of the degree of conformance to the certification standard. This is all the more true for a Phase I confidential pre-assessment (not applicable to this project as the pre-assessment entailed public notice and stakeholder consultation). Only a full certification evaluation, conducted under the auspices of the FSC and according to FSC protocols, will generate definitive determinations of conformance. Results of this pre-assessment constitute findings as to the likelihood that the candidate forest management operation would be found in conformance to FSC US National Forest Management Standard Draft 8.1 should a full assessment be conducted.

In instances where possible non-conformances or "gaps" are identified and discussed in this report, Ohio DNR-Division of Forestry may pursue a combination of the following courses of action, between now and the time of a full evaluation:

- In the event that Ohio DNR-Division of Forestry believes that an identified gap
 does not, in fact, exist despite the findings of the pre-assessment team, they may
 compile additional information and evidence to submit to the full evaluation team,
 on or before the full evaluation. The intent would be to demonstrate how Ohio
 DNR-Division of Forestry feels it is conforming to a particular Criterion or
 Indicator.
- Formulate and implement as far as possible, corrective actions aimed at closing the identified gaps prior to the full evaluation.

3.1. Gap Analysis

Based upon the information gathered, and preliminary judgments formed from document reviews, personal interviews and field inspections, it is the SCS audit team's overall finding that ODNR has made very solid progress since October 2007 (the date when the Governor directed the ODNR to seek forest management certification) in aligning the State Forest management systems with the FSC certification requirements. While there are likely still gaps that need to be address (prior to or subsequent to a full evaluation), it is our sense that achievement of FSC-endorsed forest management certification is certainly well within the realm of attainment. That is, it is our sense that it would not be obviously premature to engage in a full certification evaluation during the second half of 2010. We hasten to restate that this general sense of readiness is by no means an indication that attainment of certification is assured. The more that the Division of Forestry continues to pursue the new initiatives that have been initiated since October 2007 prior to a full evaluation, the less likely that major non-conformities will be found during a full evaluation.

Areas of Possible Non-Conformance: Overall, the audit team found many aspects of the ODRN forest management program to be commendable. However, the team found that there are, at present, some key aspects of ODNR's forest management program that would likely be found to be in insufficient conformity to the applicable FSC forest stewardship standard should a full evaluation be conducted. Most of the non-conformities are likely to be classified as "minor" which means that their closure is not required as a precondition to the award of certification. In such cases, the Department will be given anywhere from a few months to a full year to complete the necessary actions that will close the non-conformities.

In the absence of further preparatory actions being taken by the Department of Forestry, it is likely however that some non-conformities will be classed as "major" and, as such, their closure will be required prior to award of certification.

The following table details the principal areas where the pre-assessment auditors have identified possible gaps in conformance (both major and minor) relative to the FSC US National Forest Management Standard Draft 8.1.

More detail and discussion is provided in Section 3.2, below.

with respect to planning and operations documents DNR needs to: a) determine what international treaties and conventions may apply to the management of the State Forests, if any, and b) conduct a self assessment to determine if there are any possible non-conformitivity as easy as "widespread but not out of control." Widespread illegal activity constitutes a non-conformity with Criterion 1.5 A publicly available written statement of commitment to manage the State Forests in compliance with the FSC certification standards has not yet been issued No potential non-conformities were identified relative to this Principle during the pre-assessment P2: Tenure & Use Rights Responsibilities P3 – Indigenous Peoples' Rights Conscious consideration of possible indigenous resources and tenure rights does not appear to be part of the Division of Forestry's managem system ODOF does not have in place adequate procedures for monitoring social impacts of its State Forest management operations ODOF does not have in place adequate procedures and policies for truic consultative interaction with its stakeholders The dispute between the Division and one Ohio county regarding the balance of stumpage and merchandising sales in their county is an issu pertinent to this Criterion and underscores the need for dispute resolution mechanisms Available evidence suggests that the Division cannot presently demonstrate conformity with the requirement that there are "known and accessible means for stakeholders to voice grievances and have them resolved" P5: Benefits from the Forest AAC calculation procedures are not in place. ODOF should give	Commitment and	
Rights & Responsibilities P3 - Indigenous Peoples' Rights • Conscious consideration of possible indigenous resources and tenure rights does not appear to be part of the Division of Forestry's managem system • ODOF does not, in a culturally appropriate manner, consult with pertine indigenous peoples • ODOF does not have in place adequate procedures for monitoring social impacts of its State Forest management operations • ODOF does not have in place adequate procedures and policies for true consultative interaction with its stakeholders • The dispute between the Division and one Ohio county regarding the balance of stumpage and merchandising sales in their county is an issurpertinent to this Criterion and underscores the need for dispute resolution mechanisms • Available evidence suggests that the Division cannot presently demonstrate conformity with the requirement that there are "known and accessible means for stakeholders to voice grievances and have them resolved" P5: Benefits from the Forest • ODOF needs to better demonstrate knowledge of the effects of State Forest management operations on local economies • AAC calculation procedures are not in place. ODOF should give		 with respect to planning and operations documents DNR needs to: a) determine what international treaties and conventions may apply to the management of the State Forests, if any, and b) conduct a self assessment to determine if there are any possible non-conformities Illegal ATV use on the State Forests is characterized by ODOF managers as "widespread but not out of control." Widespread illegal activity constitutes a non-conformity with Criterion 1.5 A publicly available written statement of commitment to manage the State Forests in compliance with the FSC certification standards has not yet been issued
rights does not appear to be part of the Division of Forestry's managem system ODOF does not, in a culturally appropriate manner, consult with pertine indigenous peoples P4: Community Relations & Workers' Rights ODOF does not have in place adequate procedures for monitoring social impacts of its State Forest management operations ODOF does not have in place adequate procedures and policies for truit consultative interaction with its stakeholders The dispute between the Division and one Ohio county regarding the balance of stumpage and merchandising sales in their county is an issurpertinent to this Criterion and underscores the need for dispute resolution mechanisms Available evidence suggests that the Division cannot presently demonstrate conformity with the requirement that there are "known and accessible means for stakeholders to voice grievances and have them resolved" P5: Benefits from the Forest ODOF needs to better demonstrate knowledge of the effects of State Forest management operations on local economies AAC calculation procedures are not in place. ODOF should give	Rights & Responsibilities	the pre-assessment (ities
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the Forest Forest management operations on local economies AAC calculation procedures are not in place. ODOF should give	Relations &	 impacts of its State Forest management operations ODOF does not have in place adequate procedures and policies for truly consultative interaction with its stakeholders The dispute between the Division and one Ohio county regarding the balance of stumpage and merchandising sales in their county is an issue pertinent to this Criterion and underscores the need for dispute resolution mechanisms Available evidence suggests that the Division cannot presently demonstrate conformity with the requirement that there are "known and accessible means for stakeholders to voice grievances and have them
documents an allowable harvest planning process	he Forest	ODOF needs to better demonstrate knowledge of the effects of State Forest management operations on local economies AAC calculation procedures are not in place. ODOF should give consideration to the bulleted items Indicator 5.6.a as it designs and documents an allowable harvest planning process
 and generally provide technical support to the management of the State Forests needs to be better articulated and documented A gap assessment of the current system of reference areas within the eregions in which the State Forests are located needs to be completed post the approach described in Criterion 6.4 Written guidelines to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources may need to be fortified In-stand structural retention guidelines for even-aged harvest units need be brought in line with the Standard 		 means and methods by which Division of Wildlife biologists are consulted and generally provide technical support to the management of the State Forests needs to be better articulated and documented A gap assessment of the current system of reference areas within the ecoregions in which the State Forests are located needs to be completed per the approach described in Criterion 6.4 Written guidelines to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources may need to be fortified In-stand structural retention guidelines for even-aged harvest units need to be brought in line with the Standard

Plan	 Stakeholder consultation and overall transparency of the planning process is not at a level required by the Standard The "integration process" is not adequately documented and transparent to the public Not all of the subject areas enumerated in Criterion 7.1 are adequately addressed in the compendium of management planning activities and documents. Policies and procedures for regularly updating management plans have yet to be promulgated
P8: Monitoring & Assessment	 There are numerous activities undertaken on the State Forests that are responsive to this Principle. However, the monitoring of socio-economic impacts of State Forest management activities does not presently comply with FSC requirements Chain of Custody procedures need to be developed and documented The feedback link between monitoring and plan revisions needs to be articulated and documented
P9: Maintenance of	A start has been made with the establishment of the zoning of the State
High Conservation Value Forest	Forests that includes a HCVF zone. But there remain substantial gaps relative to:
value i orest	Stakeholder and expert consultation on HCVF definition, presence within the State Forests, management prescriptions and monitoring of efficacy
	 Developing management prescriptions intended to maintain and/or restore identified high conservation values
	 Developing and implementing HCVF monitoring procedures Incorporating HCVF into management plans
	Considering conditions on neighboring properties
P10 – Plantations	This Principle is not applicable to the management of the Ohio State Forest System as ODOF practices meet the FSC's definition of "natural forest management"
Chain of custody	DNR will need to develop and document forest "stump to gate" chain of
(CoC) Requirements	custody procedures that include the log merchandizing yard(s).
Group Certification Requirements	Not applicable.

3.2. FSC-US Forest Management Standard Draft 8.1 Conformance Table, Version 9.0, 5/9/05*

Annotation Guide:

"C"	likely to be found in conformance with the Criterion or Sub-
	Criterion
"NC"	likely to be found in non-conformance with the Criterion or Sub-
	Criterion
"C/NC"	at the margin of conformance with the Criterion or Sub-Criterion
"NA"	not applicable

^{*}Pre-assessments are conducted at the Criterion level. Please see http://www.fscus.org/documents/ for a full copy of the Pacific Coast standard and its associated regional indicators.

REQUIREMENT	c	COMMENT/CAR
P1 Forest management shall respect all applicable laws of the country in which they occur, and international		
treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
C1.1 Forest management shall respect	C	Public transparency (availability of planning and management
all national and local laws and		documents through means other than FOIA requests) may need
administrative requirements.		to be improved
1.1.a. <i>Forest</i> management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and <i>administrative requirements</i> (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <i>Certifying Body</i> (CB) during the annual audit.	+	Operations appear to be undertaken with good knowledge an in sound conformity with legal/regulatory requirements; however, a few stakeholders believe otherwise—if these stakeholder convictions are not addressed and hopefully ameliorated by the DNR, it is likely that assertions of DNR's improprieties will be redirected to FSC in hopes of gaining traction
1.1.b. To facilitate legal compliance, the <i>forest owner</i> or <i>manager</i> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	+	On the basis of very limited exposure to DNR staff, our impression is that their working knowledge of applicable legal and regulatory requirements is solid
1.1.c. Forest management plans and operations meet or exceed all applicable laws and administrative requirements with respect to sharing public information, opening records to the public, and following procedures for public participation.	+/-	Our impression is that ODOF could improve its procedures for maintaining public transparency with respect to planning and operations documents
C1.2. All applicable and legally	C	No evidence of possible non-conformities emerged during the
prescribed fees, royalties, taxes and		pre-assessment
other charges shall be paid. 1.2.a. The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.	+	
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C/NC	We consider it unlikely that ODOF's operations are in violation with any applicable international agreements and conventions. On the other hand, it is our sense that DNR does not know what international treaties and conventions may be applicable, if any.
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements	+/-	It is likely that Minor CAR would be issued in full evaluation, asking ODOF to: a) determine what international treaties and conventions may apply to the management of the State Forests, if any, and b) conduct a self assessment to determine if there are any possible non-conformities
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.	С	This criterion is primarily forward looking (applies after award of certification)
1.4.a. Situations in which compliance	+/-	A Minor CAR is likely to be issued during a full evaluation,

th laws or regulations conflicts with impliance with FSC Principles, Criteria Indicators are documented and referred the CB.	ļ	asking the DNR to generate a written statement or policy,
Indicators are documented and referred		
	l	endorsed by the State Forester, that any such conflicts will be
the CB.	ł	brought to the attention of SCS.
		
1.5. Forest management areas should	C	A full evaluation is likely to confirm adequate overall conformity
protected from illegal harvesting,	ł	with this Criterion
ttlement and other unauthorized	ł	
tivities.		However, illegal ATV use is an issue that will be investigated
		further during a full evaluation
5.a. The forest owner or manager	+	The Division has a law enforcement branch which, in itself, is a
pports or implements measures	ł	preventative measure to minimize illegal activities. The Division
tended to prevent illegal and	ł	and Department also employ public education mechanisms to
authorized activities on the <i>Forest</i>	ł	reduce illegal or unauthorized activities
anagement Unit (FMU).	ł	
		It is our sense that illegal activities are not widespread, with the exception of the illegal ATV use (see next Indicator)
5.b. If illegal or unauthorized activities	+/-	Actions are implemented to control illegal ATV use but illegal
cur, the forest owner or manager	·	use is characterized as "widespread but not out of control." We
aplements actions designed to curtail	1	consider this to be a contradictory statement and a possible
ch activities and correct the situation to		indication of a non-conformity or, at a minimum, an OFI
e extent possible for meeting all land	1	(opportunity for improvement)
anagement objectives with	1	C.F. C.
onsideration of available resources.		
1.6. Forest managers shall	C/NC	This is also a primarily forward looking Criterion. So it is
emonstrate a long-term commitment		unlikely that a major non-conformity would be detected in a full
adhere to the FSC Principles and	1	evaluation. However, minor non-conformities are more likely.
riteria.	ł	evaluation. However, inflior floir-comorfifties are more fixery.
6.a. The forest owner or manager	_	Likely minor non-conformity unless the ODOF issues a publicly
	-	
emonstrates a long-term commitment to the FSC Principles and Criteria	ł	available written statement of commitment to manage the State Forests in compliance with the FSC certification standards
	ł	Potests in compitance with the PSC certification standards
d FSC and FSC-US policies, including	ł	
e FSC-US Land Sales Policy, and has a	ł	
ablicly available statement of	ł	
ommitment to manage the FMU in	ł	
onformance with FSC standards and	ł	
olicies. 6.b. If the certificate holder does not		All Call I I II al Dilli CE al la la
	+	All of the lands managed by the Division of Forestry are intended
rtify their entire holdings, then they	ł	to be included in the scope of the certification evaluation.
ocument, in brief, the reasons for	ł	E 'Cd 1 1 11 d d DMD I' '
eking partial certification referencing	ł	Even if the lands managed by the other DNR divisions were
SC-POL-20-002 (or subsequent policy		considered part of the "forest estate," our strong sense is that the
visions), the location of other managed		management of these other lands would not constitute any non-
rest units, the natural resources found	1	conformity with FSC-POL-20-002
	1	
	1	
	<u> </u>	
	+	
	1	the land area under certification.
	1	
	e land a	and forest resources shall be clearly defined, documented and
gally established.	C	Conformity with the core of this Criterion appears to be beyond
gally established. 2.1. Clear evidence of long-term		any doubt
2.1. Clear evidence of long-term		• •
2.1. Clear evidence of long-term rest use rights to the land (e.g., land	1	
2.1. Clear evidence of long-term rest use rights to the land (e.g., land le, customary rights, or lease		
2.1. Clear evidence of long-term rest use rights to the land (e.g., land le, customary rights, or lease greements) shall be demonstrated.	+	
2.1. Clear evidence of long-term rest use rights to the land (e.g., land le, customary rights, or lease greements) shall be demonstrated. 1.a. The forest owner or manager	+	
2.1. Clear evidence of long-term rest use rights to the land (e.g., land le, customary rights, or lease greements) shall be demonstrated.	+	
the holdings being excluded from rtification, and the management tivities planned for the holdings being cluded from certification. 6.c. The forest owner or manager of tifies the Certifying Body of gnificant changes in ownership and/or gnificant changes in management anning within 90 days of such change. 2 Long-term tenure and use rights to the	e land a	Conformity with this Indicator would be more readily assured the DNR issued a policy that it will notify SCS of any change the land area under certification. Ind forest resources shall be clearly defined, documented and Conformity with the core of this Criterion appears to be beyond.

mlon.	1	
plan. 2.1.b. The forest owner or manager	+/-	Evidence that DNR has cataloged all such established rights would
identifies and documents legally	+/-	help in establishing conformity to this Indicator during a full
established use and access rights		evaluation
		Evaluation
associated with the FMU that are held by		
other parties.		To the Product DND 1 of Control of the Product DND 1 of Contro
2.1.c. Boundaries of land ownership and	+	It is our understanding that DNR does in fact mark boundaries, as
use rights are clearly identified on the		required in this Indicator
ground and on maps prior to commencing		
management activities in the vicinity of		
the boundaries.		
C2.2. Local communities with legal or	C	No evidence to suggest that DNR, as a duly established state
customary tenure or use rights shall		agency with public trust management responsibilities, is operating
maintain control, to the extent		in a manner that conflicts with or ignores customary tenure or use
necessary to protect their rights or		rights
resources, over forest operations unless		
they delegate control with free and		
informed consent to other agencies.		
Applicability Note: For the planning and		
management of publicly owned forests,		
the local community is defined as all		
residents and property owners of the		
relevant jurisdiction.		
2.2.a. The forest owner or manager	+	Conformity is highly likely to be confirmed in a full evaluation
allows the exercise of <i>tenure</i> and <i>use</i>	'	Conformity is highly fixely to be commind in a full evaluation
rights allowable by law or regulation.		
2.2.b. In FMUs where tenure or use	+	Regardless established tenure or use rights, DNR engages in
	+	
rights held by others exist, the forest		public dialogue about its management policies and practices.
owner or manager consults with groups		However, and as addressed elsewhere in this Standard, DNR may
that hold such rights so that management		need to enhance its approach to consultation as distinct from
activities do not significantly impact the		public transparency and information sharing. As a public agency,
uses or benefits of such rights.		consultation requires structured opportunities for stakeholders to
		offer input and have the sense that DNR is actively listening to
		and duly considering such input.
C2.3. Appropriate mechanisms shall be	С	Available administrative appeals and the availability of the Ohio
employed to resolve disputes over		state court system probably constitute adequate conformity.
tenure claims and use rights. The		
circumstances and status of any		It is our sense that there are no active disputes over tenure claims
outstanding disputes will be explicitly		and use rights. If there are, they need to be made known to the full
considered in the certification		evaluation team.
evaluation. Disputes of substantial		
magnitude involving a significant		
number of interests will normally		
disqualify an operation from being		
certified.		
2.3.a. If <i>disputes</i> arise regarding tenure	+	DNR appears to have a long standing commitment to open
claims or use rights then the forest owner		dialogue
or manager initially attempts to resolve		
them through open communication,		
negotiation, and/or mediation. If these		
good-faith efforts fail, then federal, state,		
and/or local laws are employed to resolve		
such disputes.		
2.3.b. The forest owner or manager	1	Conformity would be enhanced if a register of such disputes over
	+	
	1	tenure or use rights were maintained
documents any significant disputes over		
tenure and use rights.	<u> </u>	
tenure and use rights. P3 The legal and customary rights of ind		s peoples to own, use and manage their lands, territories, and
tenure and use rights. P3 The legal and customary rights of indresources shall be recognized and respec	ted.	s peoples to own, use and manage their lands, territories, and
tenure and use rights. P3 The legal and customary rights of indresources shall be recognized and respect C3.1. Indigenous peoples shall control		s peoples to own, use and manage their lands, territories, and
tenure and use rights. P3 The legal and customary rights of indresources shall be recognized and respec	ted.	s peoples to own, use and manage their lands, territories, and

	1	
with free and informed consent to		
other agencies.	-	
3.1.a. Tribal forest management planning		
and implementation are carried out by		
authorized tribal representatives in		
accordance with tribal laws and customs		
and relevant federal laws.		
3.1.b. The manager of a tribal forest		
secures, in writing, informed consent		
regarding forest management activities		
from the tribe or individual forest owner		
prior to commencement of those		
activities.		
C3.2. Forest management shall not	C/NC	Possible major non-conformity in the absence of a consultation
threaten or diminish, either directly or		mechanism and the offer of cooperation.
indirectly, the resources or tenure		
rights of indigenous peoples.		On the other hand, are there indigenous "resources and tenure
		rights" that exist on the Ohio State Forests that are being
		threatened. This could possibly downgrade the non-conformity
		to minor.
3.2.a. During management planning, the	-	No evidence has been provided that DNR attempts, in a
forest owner or manager consults with		culturally manner, to consult with pertinent indigenous peoples
American Indian groups that have legal		
rights or other binding agreements to the		
FMU to avoid harming their resources or		
rights.		
3.2.b. Demonstrable actions are taken so	_	Conscious consideration of possible indigenous resources and
that forest management does not	_	tenure rights does not appear to be part of the Division of
adversely affect tribal resources. When		Forestry's management system
		Forestry's management system
applicable, the management plan shall		
incorporate evidence of, and measures		
for, protecting tribal resources.	C/NC	D 11 ' C ' ' 1 1 C L '
C3.3. Sites of special cultural,	C/NC	Possible major non-conformity in the absence of a consultation
ecological, economic or religious		mechanism and the offer of cooperation.
significance to indigenous peoples shall		
be clearly identified in cooperation		On the other hand, are there indigenous sites of cultural,
with such peoples, and recognized and		ecological, economic or religious significance that exist on the
protected by forest managers.		Ohio State Forests that are being threatened. This could possibly
		downgrade the non-conformity to minor.
3.3.a. The forest owner or manager	-	No evidence has been provided that ODOF attempts, in a
invites consultation with tribal		culturally appropriate manner, to consult with pertinent
representatives in identifying sites of		indigenous peoples
current or traditional cultural,		
archeological, economic or		
religious significance.		
3.3.b. In consultation with tribal	_	See prior comment
representatives, the forest owner or		
manager develops measures to protect or		
enhance areas of special significance (see		
also Criterion 9.1).		
C3.4. Indigenous peoples shall be	NA	
compensated for the application of		
their traditional knowledge regarding		
the use of forest species or		
management systems in forest		
	1	
operations. This compensation shall be		
operations. This compensation shall be formally agreed upon with their free and informed consent before forest		
operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.		
operations. This compensation shall be formally agreed upon with their free and informed consent before forest		

in forest management is being used.		
When traditional knowledge is used,		
written protocols are jointly developed		
prior to such use and signed by local		
tribes or tribal members to protect and		
fairly compensate them for such use.		
3.4.b. The forest owner or manager		
respects the confidentiality of tribal		
traditional knowledge and assists in the		
protection of such knowledge.		
		or enhance the long-term social and economic well-being of
forest workers and local communities.	пашап	or emiance the long-term social and economic wen-being of
C4.1. The communities within, or	С	The Division appears to be operating at a high level of
	C	
adjacent to, the forest management		conformity to this Criterion
area should be given opportunities for		
employment, training, and other		
services.		
4.1.a. Employee compensation and	+	Anecdotal evidence gathered during the pre-assessment suggests
hiring practices meet or exceed the		adequate conformity with this Indicator, especially when the
prevailing <i>local</i> norms within the forestry		overall compensation package (salary plus benefits) is considered
industry.		
_		
4.1.b. Forest work is offered in ways that	+	Same as above
create high quality job opportunities for		
employees.		
1 3	+	Same as above
4.1.c. Forest workers are provided with		Same as above
fair wages.		
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4.1.d. Hiring practices and conditions of	+	Assured by state and federal law and Departmental policy
employment are non-discriminatory and		
follow applicable federal, state and local		
regulations.		
4.1.e. The forest owner or manager	+	Most DNR employees are Ohio natives; most service and product
provides work opportunities to qualified		vendors with which DNR does business are Ohio based
local applicants and seeks opportunities		
for purchasing local goods and services		
of equal price and quality.		
4.1.f. Commensurate with the size and	+	While our exposure to the Division's and the Department's
scale of operation, the forest owner or		public education programs was very limited during the pre-
manager provides and/or supports		assessment, our sense is that there are no issues here with regard
learning opportunities to improve public		to possible non-conformities, but additional evidence should be
understanding of forests and forest		made available to the full evaluation team that will enable a
management.		finding of conformity
4.1.g. The forest owner or manager	+	The Division's urban forestry program is responsive to this
participates in local economic		Indicator
development and/or civic activities, based		
on scale of operation and where such		There are also Departmental-level activities that likely contribute
opportunities are available.		to the establishment of adequate conformity.
C4.2. Forest management should meet	С	Available evidence suggest adequate overall conformity with this
or exceed all applicable laws and/or	_	Criterion such that a Major CAR is an unlikely outcome of a full
regulations covering health and safety		evaluation
of employees and their families.		
4.2.a. The forest owner or manager shall	+	Available evidence suggests conformity
meet or exceed all applicable laws and/or	'	11 and 10 criticine suggests comorning
regulations covering health and safety of		
employees (see Criterion 1.1).		
4.2.b. The forest owner or manager and	+	The pre-assessment field tour revealed nothing to suggest issues
their employees and contractors		with regard to this Indicator
demonstrate a safe work environment.		
Contracts or other written agreements		But what safety requirements apply to contractors? This will be
include safety requirements.		investigated as part of the full evaluation.
* *		

4.2.c. The forest owner or manager hires well-qualified service providers to safely implement the management plan. C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).	? C	Insufficient evidence gathered during the pre-assessment to support a preliminary judgment; this will be examined during a full evaluation Most of the DNR workforce is unionized
4.3.a. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.	+	Federal and state law as well as union contracts assure this
4.3.b. The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.	+/-	Likely conformity with regard to DNR employees. But what about contractors? This will be investigated during a full evaluation.
C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.	NC	Available evidence suggests that ODNR does not have in place adequate procedures for monitoring social impacts of its state forest management operations Available evidence suggests that DNR does not have in place adequate procedures and policies for truly consultative interaction with its stakeholders, the citizens of Ohio. Consultation involves more than what we understand to be undertaken during annual open houses In the absence of policy and procedural changes prior to a full
4.4.a. The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: • Archeological sites and sites of cultural, historical and community significance (on and off the FMU; • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. A summary is available to the CB.	-	evaluation, findings of major non-conformities are likely See comments above A summary of social impacts needs to be made available to SCS; even better, such a summary should (as opposed to shall) be made publicly available
4.4.b. The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.	-	The means by which the Division seeks and considers public input needs to be enhanced in order to demonstrate conformity with this Indicator Likely non-conformity

4.4.c. People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that	-	Public notices look to be pretty good though some stakeholders feel otherwise (e.g., advance notice of prescribed fires) Likely non-conformity
they may express concern.		Likely non-comormity
4.4.d. For <i>public forests</i> , consultation shall include the following components: 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the		More is needed. Public participation involves more than sending out notices and presenting information at open houses More formal/structured public participation mechanisms are needed in order to demonstrate conformity with this Indicator Management decisions need to more demonstrably reflect the incorporation of results of public consultation Likely non-conformity
public. C4.5. Appropriate mechanisms shall be	C/NC	While there are some high profile controversies associated with a
employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local		relatively small number of stakeholders, it is our sense that DNR fundamentally endeavors to avoid loss or damage to legal customary rights, property, resources and livelihoods of local peoples.
peoples. Measures shall be taken to avoid such loss or damage.		A dispute between the Division and an Ohio county regarding the balance between stumpage and merchandising sales in their county is an issue pertinent to this Criterion and underscores the need for dispute resolution mechanisms. The absence of a mutually acceptable resolution detracts from the Division's conformity to this Criterion.
		Possible minor non-conformity with regard to the lack of a Divisional-level informal dispute resolution mechanism. Merely pointing to the availability of civil litigation is not adequate conformity to this Criterion.
4.5.a. The forest owner or manager does not engage in negligent activities that cause damage to other people.	+/-	The Notice of Violation with regard to prescribed fire needs to be thoroughly examined as part of the full evaluation
4.5.b. The forest owner or manager provides a known and accessible means for interested stakeholders to voice	+/-	It is our impression that Division managers and other personnel maintain open dialogue.
grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute		But this Indicator requires "known and accessible means for stakeholders to voice grievances and have them resolved." The available evidence suggests that the Division cannot presently demonstrate conformity with this requirement.
resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains		Possible minor non-conformity

records of the dispute resolution process.	1	
to ensure economic viability and a wide r C5.1. Forest management should strive		It is our sense that adequate overall conformity to this Criterion is
toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest. 5.1.a. The forest owner or manager is	+/-	likely to be confirmed in a full evaluation. Years of budget and concomitant staff reductions obviously clash
financially able to implement core management activities, including all those required to meet this Standard, and investment and reinvestment in forest management.		with this Indicator. Despite the cuts, the total budget and number of employees exceeds those associated with privately owned forest estates of similar size
5.1.b. Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	+	Timber harvest levels are clearly not driven by short-term financial factors. Harvest levels do not exceed planned levels
C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	С	On the basis of the information gathered during the pre- assessment we conclude that adequate overall conformity to this Criterion is likely to be confirmed in a full evaluation.
5.2.a. Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.	+	All logging contractors bidding on State Forest timber sales are Ohio based and generally located within the same or neighboring counties were the state forests are located Most logs from the state forests are processed by Ohio mills
5.2.b. The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.	+	The log merchandizing initiative is very responsive to this Indicator
5.2.c. On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.	+	Most all sales are awarded to small logging contractors
C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	С	As we were not able to examine active timber harvests during the pre-assessment, our ability to identify possible gaps relative to this Criterion was very limited. However, it is our sense from an examination of post harvest stands that the Division is well positioned to demonstrate conformity to this Criterion in a full evaluation.
5.3.a. Management practices are employed to minimize the loss and/or waste of harvested forest products.	+	
5.3.b. Harvest practices are managed to protect residual trees and other forest resources, including:	+	More formal soil compaction and rutting guidelines would enhance conformity to this Indicator

 soil compaction, rutting and erosion are minimized; residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; damage to NTFPs is minimized during management activities; and techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible. 		
C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	С	
5.4.a. The forest owner or manager demonstrates knowledge of their operation's effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services, and strives to diversify the economic use of the forest accordingly.	+/-	
C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	C/NC	Adequate overall conformity to this Criterion would be strengthened by expanding the range public trust resources that are explicitly considered in the course of managing the State Forests
5.5.a. In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.	+/-	ODOF's efforts to demonstrate conformity to this Indicator would benefit for more structured programs or measures being taken <i>on the State Forests</i> that are explicitly tied to public trust values such as fisheries, maintenance of high quality water on forest areas within municipal watersheds, and carbon sequestration. The extent of recreational opportunities on the State Forests looks to be appropriate for the size of the estate and the fact that the Department manages other properties exclusively for public
C5.6. The rate of harvest of forest products shall not exceed levels that can be permanently sustained.	C/NC	outdoor recreation Harvest levels are clearly sustainable (roughly one-third of periodic increment) but the Division has not undertaken an allowable harvest planning/calculation process; likely minor non-conformity
5.6.a. In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan. The sustained yield harvest level calculation for each planning unit is based on:	-	AAC calculation procedures are not in place. ODOF should give consideration to the bulleted items in this Indicator as it designs and documents an allowable harvest planning process Likely minor non-conformity, rather than a major non-conformity because actual harvest levels are demonstrably well below maximum sustainable potentials

documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; mortality and decay and other factors that affect net growth; areas reserved from harvest or subject to harvest restrictions to meet other management goals; silvicultural practices that will be employed on the FMU; management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.		
5.6.b. Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	+	No problems, here; harvest levels are at roughly one-third of periodic increment
5.6.c. Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	+	Our limited examination of forest stands during the pre- assessment leads us to conclude that ODOF is likely able to demonstrate conformity to this Indicator during a full evaluation
5.6.d. For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	NA?	It is our understanding that ODOF does not manage for the commercial production of non-timber forest products. Non-commercial activities such as firewood gathering is allowed under a permit system
		diversity and its associated values, water resources, soils, and d, by so doing, maintain the ecological functions and the
integrity of the forest.		
C6.1. Assessments of environmental	C/NC	It is likely that a full evaluation will reveal a need for ODOF to
impacts shall be completed		fortify its environmental impact assessment approaches.
appropriate to the scale, intensity of		However, we consider it likely that it will be a minor rather than
forest management and the uniqueness		a major non-conformity as there are impact methods in place,
of the affected resources and		albeit of a form and substance that probably does not adequately
adequately integrated into		comply with this Criterion
management systems. Assessments		

shall include landscape level		
considerations as well as the impacts of		
on-site processing facilities. Environmental impacts shall be		
assessed prior to commencement of		
site-disturbing operations.		
6.1.a. Using the results of <i>credible</i>	+/-	The means and methods by which Division of Wildlife biologists
scientific analysis, best available		are consulted and generally provide technical support to the
information (including relevant		management of the State Forests needs to be better articulated
databases), and local knowledge and		and documented
experience, an assessment of conditions		
on the FMU is completed and includes:		
Forest community types and		
development, size class and/or		
successional stages, and associated		
natural disturbance regimes;		
2) Rare, Threatened and Endangered		
(RTE) species and rare ecological		
communities (including plant		
communities); 3) Other habitats and species of		
management concern;		
Water resources and associated		
riparian habitats and hydrologic		
functions;		
5) Soil resources; and		
6) <i>Historic conditions</i> on the FMU		
related to forest community types and		
development, size class and/or successional stages, and a broad		
comparison of historic and current		
conditions.		
(11 B)	. /	
6.1.b. Prior to commencing site- disturbing activities, the forest owner or	+/-	The compartment review process does constitute a form of pre- disturbance impact assessment; however, it is marginally
manager assesses and documents the		adequate relative to the depth and scope of the impact assessment
potential short and long-term impacts of		expected in this
planned management activities on		1
elements 1-5 listed in Criterion 6.1.a.		
The		
The assessment must incorporate the best		
available information, drawing from scientific literature and experts. The		
impact assessment will at minimum		
include identifying resources that may be		
impacted by management (e.g., streams,		
habitats of management concern, soil		
nutrients). Additional detail (i.e.,		
detailed description or quantification of		
impacts) will vary depending on the		
uniqueness of the resource, potential risks, and steps that will be taken to avoid		
and minimize risks.		
6.1.c. Using the findings of the impact	+/-	Conformity will be improved if the link between impact
assessment (Indicator 6.1.b),		assessments and management prescriptions is clarified and
management approaches and field		fortified
prescriptions are developed and		
implemented that: 1) avoid or minimize negative short-term and long-term		
impacts; and, 2) maintain and/or enhance		
impacts, and, 2) maintain and/of chilance	<u> </u>	

the long-term ecological viability of the		
forest.		
6.1.d. On public lands, assessments developed in Indicator 6.1.a and	-	At present, it does not appear that ODOF's management systems adequately comply with this Indicator.
management approaches developed in		adequatery compry with this indicator.
Indicator 6.1.c are made available to the		A minor non conformity is a likely outcome of a full evaluation
public in draft form for review and		A minor non-conformity is a likely outcome of a full evaluation.
comment prior to finalization. Final		
assessments are also made available.	-	A 211 11 4 11 4 4 4 4 4 4 4 4 4 4 4 4 4 4
C 6.2. Safeguards shall exist which	C	Available evidence gathered during the pre-assessment does not
protect rare, threatened and		suggest that ODOF is failing to provide basic coverage of listed
endangered species and their habitats		species management. This will be investigated in more depth
(e.g., nesting and feeding areas).		during a full evaluation
Conservation zones and protection		
areas shall be established, appropriate		
to the scale and intensity of forest		
management and the uniqueness of the		
affected resources. Inappropriate		
hunting, fishing, trapping, and		
collecting shall be controlled.		
6.2.a. If there is a likely presence of RTE	+	
species as identified in Indicator 6.1.a		
then either a field survey to verify the		
species' presence or absence is conducted		
prior to site-disturbing management		
activities, or management occurs with the		
assumption that potential RTE species		
are present.		
and presents		
Surveys shall be conducted by biologists		
with the appropriate expertise in the		
species of interest and with appropriate		
qualifications to conduct the surveys.		
If a species is determined to be present,		
its location should be reported to the		
manager of the appropriate database.		
manager of the appropriate database.		
6.2.b. When RTE species are present or	+	Departmental personnel appear to be appropriately cognizant of
assumed to be present, modifications in	,	RTE management issues including which species are likely
management are made in order to		present on the State Forests
maintain, restore or enhance the extent,		present on the state 1 orests
quality and viability of the species and		
their habitats.		
and incitation		
Conservation zones and/or protected		
areas are established for RTE species,		
including those S3 species that are		
considered rare, where they are necessary		
to maintain or improve the short and		
long-term viability of the species.		
Conservation measures shall be based on		
relevant science, guidelines and/or		
consultation with relevant, independent		
experts as necessary to achieve the		
conservation goal of the Indicator.		
6.2.c. For medium and large public	?/+	The Indiana Bat management strategy is evidence of conformity
forests (e.g. state forests), forest	:/-	to this Indicator. Are all other endangered species found on the
management plans and operations are		State Forests receiving comparable management attention?
designed to meet species' recovery goals,		State 1 orests receiving comparative management attention?
as well as landscape level biodiversity		
as well as failuscape level blourversity		

conservation goals.		
6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	+	No issues came to the attention of the pre-assessment lead auditor
6.2.e. If a state and/or Federally listed as threatened, endangered, of special concern, or sensitive species is determined to be present, its location is reported to the manager of the species' database.	+	Compliance looks to be solid
C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	С	It is our sense that ODOF will be able to demonstrate adequate overall conformity to this Criterion during a full certification evaluation.
C6.3.a. Landscape-scale indicators		
6.3.a.1.The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	+	ODOF, in collaboration with partner entities such as the Division of Wildlife, the USDA Forest Service and The Nature Conservancy, is actively trying to create more early successional habitat The Wilderness Area in Shawnee State Forest as well as the HCVF zone as well as the other Class I zone categories will, over time, develop late successional structure
6.3.a.2. When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <i>conservation zones</i> and/or <i>protected areas</i> shall be established where warranted.	+/-	The Natural Areas sub-zone within the Class I zone appears to be responsive to this Indicator. More formalized procedures for identifying rare communities and establishing conservation zones and protected areas help to better demonstrate conformity.
6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all <i>Type 1</i> and <i>Type 2 old growth</i> . Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.	+	No evidence of potential non-conformity to this Indicator was revealed during the pre-assessment
Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other		

timber management activities, except as		
needed to maintain the ecological values		
associated with the stand, including old		
growth attributes (e.g., remove exotic		
species, conduct controlled burning, and		
thinning from below in dry forest types		
when and where restoration is		
appropriate).		
Type 2 Old Growth is protected from		
harvesting to the extent necessary to		
maintain the area, structures, and		
functions of the stand. Timber harvest in		
Type 2 old growth must maintain old		
growth structures, functions, and		
components including individual trees		
that function as refugia (see Indicator		
6.3.g).		
On public lands, old growth is protected		
from harvesting, as well as from other		
timber management activities, except if		
needed to maintain the values associated		
with the stand (e.g., remove exotic		
species, conduct controlled burning, and thinning from below in forest types when		
and where restoration is appropriate).		
and where restoration is appropriate).		
On American Indian lands, timber		
harvest may be permitted in Type 1 and		
Type 2 old growth in recognition of their		
sovereignty and unique ownership.		
Timber harvest is permitted in situations		
where:		
1. Old growth forests comprise a		
significant portion of the tribal		
ownership.		
2. A history of forest stewardship		
by the tribe exists.		
3. High Conservation Value		
Forest attributes are		
maintained.		
4. Old-growth structures are maintained.		
5. Conservation zones		
representative of old growth		
stands are established.		
6. Landscape level considerations		
are addressed.		
7. Rare species are protected.		
6.3.b. To the extent feasible within the	+	This will be examined in more detail during a full evaluation, but
size of the ownership, particularly on		the preliminary sense is that ODOF management is consistent
larger ownerships (generally tens of		with this Indicator
thousands or more acres), management		
maintains, enhances, or restores habitat		
conditions suitable for well-distributed		
populations of animal species that are		
characteristic of forest ecosystems within		
the landscape. 6.3.c. Biological legacies of the forest	1./	More formal and robust in-stand retention policies would be
0.5.c. Diological legacies of the forest	+/-	More formal and robust in-stand retention policies would be

community are retained at the forest and		helpful
stand levels, consistent with the objectives of the management plan, including but not limited to: large live and declining trees, coarse dead wood, logs, snags, den trees, and soil organic matter.		
Stand-scale Indicators 6.3.d. Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.	+	The only issue that arose during the pre-assessment that potentially detracts from conformity to this Indicator is the strongly held opinion of a limited number of stakeholders that ODOF ought not to be managing for oak habitat using prescribed fire, or any other tool, as that community type was very rare in this region, pre-European disturbance. ODOF and DOW's counterarguments need to be made available to the full evaluation team
6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. <i>Native species</i> suited to the site are normally selected for regeneration.	+	
6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, <i>snags</i> , and well-distributed coarse down and dead woody material. <i>Legacy trees</i> where present are not harvested; and b) vertical and horizontal complexity. Trees selected for <i>retention</i> are generally representative of the dominant species found on the site.	+	During a full evaluation, ODOF should be prepared to justify that the even-aged management harvest units "could be expected from naturally occurring processes." More robust in-stand retention policies and practices would help to better demonstrate conformity to this Indicator. Possible minor CAR or OFI.
6.3.g.1. In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region. In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a	+	See prior comments; possible minor CAR or OFI The new retention policies that afford no in-stand structural retention in openings up to 10 acres do not comply with the intent of this Indicator

lower level is necessary for the purposes		
of restoration or rehabilitation. See		
Appendix C for additional regional		
requirements and guidance.		
6.3.g.2. Under very limited situations, the	+/-	We are not aware of evidence to support conformity to this
landowner or manager has the option to	.,	Indicator
develop a qualified plan to allow minor		indicator
departure from the opening size limits		
described in Indicator 6.3.g.1. A		
qualified plan:		
Is developed by qualified		
experts in ecological and/or		
related fields (wildlife		
biology, hydrology,		
landscape ecology,		
forestry/silviculture).		
2. Is based on the totality of the		
best available information		
including peer-reviewed		
science regarding natural		
disturbance regimes for the		
FMU.		
3. Is spatially and temporally		
explicit and includes maps of		
proposed openings or areas.		
4. Demonstrates that the		
variations will result in equal		
or greater benefit to wildlife,		
water quality, and other		
values compared to the		
normal opening size limits,		
including for sensitive and		
rare species.		
5. Is reviewed by independent		
experts in wildlife biology,		
hydrology, and landscape		
ecology, to confirm the		
preceding findings.		
F88		
6.3.h. The forest owner or manager	+	ODOF in collaboration with other Divisions is actively taking
assesses the risk of, prioritizes, and, as		measures to control the spread of invasive exotics
warranted, develops and implements a		*
strategy to prevent or control <i>invasive</i>		The use of chemical herbicides in the context of controlling
species, including:		invasive exotics is fundamentally more compatible with FSC
1. a method to determine the		"values" than is chemical use as a standardized silvicultural tool
extent of invasive species and		
the degree of threat to native		
species and ecosystems;		
2. implementation of		
management practices that		
minimize the risk of invasive		
establishment, growth, and		
spread;		
3. eradication or control of		
established invasive		
populations when feasible:		
and,		
4. monitoring of control		
measures and management		
practices to assess their		
effectiveness in preventing or		
controlling invasive species.		

6.3.i. In applicable situations, the forest	+	
owner or manager identifies and applies site-specific fuels management practices,		
based on: (1) natural fire regimes, (2) risk		
of wildfire, (3) potential economic losses,		
(4) public safety, and (5) applicable laws		
and regulations.		
*C6.4. Representative samples of	NC	ODOF has not yet undertaken the landscape-level gap analysis of
existing ecosystems within the		ecological reference areas, as required in this Criterion. In the
landscape shall be protected in their		absence of completing or at least substantially initiating the
natural state and recorded on maps,		analytical steps required in this Criterion by the time of a full
appropriate to the scale and intensity		evaluation, it is likely that a major CAR would be issued.
of operations and the uniqueness of the		
affected resources.		
6.4.a. The forest owner or manager	-	The required GAP analysis needs to be undertaken
documents the ecosystems that would		
naturally exist on the FMU, and assesses		Any other DNR-managed lands, outside of the State Forest
the adequacy of their representation and		System, that qualify as ecological reference areas can be counted
protection in the <i>landscape</i> (see Criterion		in the GAP analysis
7.1). The assessment for medium and		
large forests include some or all of the		The Natural Area zone designation is responsive to this Criterion;
following: a) GAP analyses; b)		the basis for enrolling areas into that zone needs to be along the
collaboration with state natural heritage		lines of what is required in this Criterion
programs and other public agencies; c)		
regional, landscape, and watershed		
planning efforts; d) collaboration with universities and/or local conservation		
groups.		
For an area that is not located on the		
FMU to qualify as a Representative		
Sample Area (RSA), it should be under		
permanent protection in its natural state.		
6.4.b. Where existing areas within the	-	The ODOF estate meets the FSC definition of a "large FMU" so
landscape, but external to the FMU, are		pay attention to this Indicator
not of adequate protection, size, and		
configuration to serve as representative		
samples of existing ecosystems, forest		
owners or managers, whose properties		
are conducive to the establishment of		
such areas, designate ecologically viable		
RSAs to serve these purposes.		
Large FMUs are generally expected to		
establish RSAs of purpose 2 and 3 within		
the FMU.		
6.4.c. Management activities within	+	ODOF's description, found in Chapter 2 of its Manual, of
RSAs are limited to low impact activities		allowed/planned uses within Zone 1 lands looks to be compatible
compatible with the protected RSA		with this Indicator
objectives, except under the following		
circumstances:		
a) harvesting activities only where		
they are necessary to restore		
or create conditions to meet		
the objectives of the protected		
RSA, or to mitigate conditions		
that interfere with achieving		
the RSA objectives; or		
b) road-building only where it is	l	

documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated. 6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.	-	This is a matter of establishing a policy that does not yet exist
6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	+/-	This Indicator applies. The Wilderness Area in Shawnee State Forest is compatible with the expectation
C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	C/NC	
6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	+/-	ODOF's has written guidelines but it is likely that a full evaluation team will conclude that these guidelines constitute inadequate conformity to this Criterion. One or more minor non-conformities are possible.
6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	+	There are Ohio BMPs. By policy, ODOF endeavors to comply with the voluntary BMPs as if they were mandatory. Or sense is that there is good compliance with the BMPs but of course this will be examined in more detail during a full evaluation.
6.5.c. Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is	+	Available evidence suggests that a full evaluation would reveal adequate conformity to this Indicator
minimized. • Soil erosion is not accelerated.		

 Burning is only done when consistent with natural disturbance regimes. Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. Low impact equipment and technologies is used where appropriate. 		
6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes: • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated.	+/-	The current state of the Ohio State Forest road system may be marginal relative to this Indicator
6.5.e.1.In consultation with appropriate expertise, the forest owner or manager implements written <i>Streamside Management Zone</i> (SMZ) <i>buffer</i> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water	+/-	The road in the creek accessing the Boy Scout camping site (visited during the pre-assessment) is in conflict with this Indicator—possible Minor CAR or OFI

C6.6. Management systems shall	C	Chemical use is relatively limited on the State Forests.
vegetation, and the banks of the stream channel from erosion.		
composition and viability of the riparian		
and water quality, the species		
controlled to protect in-stream habitats	т	140 grazing anothents on the State Polests so a non-issue
habitats. 6.5.h. Grazing by domesticated animals is	+	Likely CAR or OFI No grazing allotments on the State Forests so a non-issue
soils, water, plants, wildlife and wildlife		recreational vehicle roadways is an issue
managed to avoid negative impacts to		Management of the network of established motorized
6.5.g. Recreation use on the FMU is	+/-	Illegal ATV use is an issue
hydrological conditions when operations are finished.		
crossings are restored to original		
movement of aquatic species. Temporary		
<i>habitat</i> . Crossings do not impede the		
hydrology, and fragmentation of <i>aquatic</i>		
crossings are located and constructed to minimize impacts on water quality,		camp area—possible CAR or OFI
avoided when possible. Unavoidable		intersections; a notable exception is the road to the Boy Scout
6.5.f. Stream and wetland crossings are	+/-	Generally, ODOF endeavors to minimize road/watercourse
closely related field.		
independent expert in aquatic ecology or		
requirements, based on the input of an		
alternative configuration. The CB must verify that the variations meet these		
habitats and species addressed in the		
including a description of the riparian		
written set of supporting information		
forest owner or manager develops a		
species, based on site-specific conditions and the best available information. The		
segments, water quality, and aquatic		
regional requirements for those stream		
environmental protection than FSC-US		
and provides equivalent or greater		
that the alternative configuration maintains the overall extent of the buffers		
forest owner or manager demonstrates		
limited circumstances, provided the		
other water bodies are permitted in		
specific stream segments, wetlands and		
minimum SMZ widths and layout for		
6.5.e.2. Minor variations from the stated		
requirements in Appendix E.		
within those SMZs. These are outlined as		
limitations on the activities that can occur		
minimum SMZ widths and explicit		
Coast regions, there are requirements for		
Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific		
In the Appalachia, Ozark-Ouachita,		
buffers.		
measures that are acceptable within those		
sensitive areas. The guidelines include vegetative buffer widths and protection		
shorelines, and other hydrologically		
pools, seeps and springs, lake and pond		
and stream corridors, wetlands, vernal		

promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks. 6.6.a. No products on the FSC list of Prohibited Pesticides are used (see FSC-GUI-30-001 v2).	+	Prior to a full evaluation, ODOF must provide SCS will a comprehensive list of all pesticides used on the State Forests, include the trade name and chemical constituents The recent increase in chemical use has been part of a ecological restoration initiative; this context of use is much more acceptable on FSC-certified forests Overall, it is our expectation that adequate conformity to this Criterion can be confirmed during a full evaluation We were told during the pre-assessment that no "prohibited" chemicals are in use; these needs to be confirmed by ODOF providing a complete list of all chemicals in use
6.6.b. All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.	+	Chemical use is limited and used in the framework of IPM
6.6.c. Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager shall evaluate the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.	+/-	Better documentation of the process by which chemicals and application methods are determined would be helpful in confirming conformity to this Indicator

		,
6.6.d. Whenever chemicals are used, a	?	Are written prescriptions prepared? If not, this would be a minor
written prescription is prepared that		non-conformity.
describes the site-specific hazards and		
environmental risks, and the precautions		
that workers will employ to avoid or		
minimize those hazards and risks, and		
includes a map of the treatment area.		
Chemicals are applied only by workers		
who have received proper training in		
application methods and safety. They are		
made aware of the risks, wear proper		
safety equipment, and are trained to		
minimize environmental impacts on non-		
target species and sites.		
	0	
6.6.e. If chemicals are used, the effects	?	What, if any, post-application monitoring is undertaken?
are monitored and the results are used for		
adaptive management. Records are kept		
of pest occurrences, control measures,		
and incidences of worker exposure to		
chemicals. C6.7. Chemicals, containers, liquid and	C/NC	ODOF's general expectations regarding contractor performance
solid non-organic wastes including fuel	CITIC	are compatible with this Criterion. However, more explicit
and oil shall be disposed of in an		contact requirements would help to demonstrate conformity.
environmentally appropriate manner		Without changes being made prior to a full evaluation, a minor
at off-site locations.		non-conformity is likely.
6.7.a. The forest owner or manager, and	+/-	Spill kits are not required in contractor vehicles which is
employees and contractors, have the	''	incompatible with this Indicator
equipment and training necessary to		moonputoto with this indicator
respond to hazardous spills		
6.7.b. In the event of a hazardous	+/-	Spill kits are not required in contractor vehicles which is
material spill, the forest owner or	''	incompatible with this Indicator
manager immediately contains the		*
material and engages qualified personnel		Is there a contract term that obligates a contractor to immediately
to perform the appropriate removal and		respond in the event of a spill?
remediation, as required by applicable		<u> </u>
law and regulations.		
6.7.c. Hazardous materials and fuels are	+/-	What are ODOF's policies with regard to storage of fluids for
stored in leak-proof containers in		their own fleet of vehicles and equipment?
designated storage areas, that are outside		• •
of riparian management zones and away		
from other ecological sensitive features,		
until they are used or transported to an		
approved off-site location for disposal.		
There is no evidence of persistent fluid		
leaks from equipment or of recent		
groundwater or surface water		
contamination.		
C6.8. Use of biological control agents	С	No GMO's are in use on the State Forests
shall be documented, minimized,		
monitored, and strictly controlled in		Biological control agent use is limited to R&D no operational
accordance with national laws and		use
internationally accepted scientific		
protocols. Use of genetically modified		
organisms shall be prohibited.		
6.8.a. Use of biological control agents	+	No operational deployment
are used only as part of a pest		
management strategy for the control of		Lots of screening before their use
invasive plants, <i>pathogens</i> , insects, or		
other animals when other pest control		IPM is employed on the State Forests
methods are ineffective, or are expected		
to be ineffective. Such use is contingent	<u> </u>	

	
+	
1	
1	No GMO's A written policy that GMO's will not be dealers 1
+	No GMO's. A written policy that GMO's will not be deployed on the State Forests would enhance conformity to this Indicator
C	Conformity to this Criterion is likely to be confirmed during a
	full evaluation
1	
1	
+	We were informed that ODOF does not use exotic species
'	and of the document of the species
1	
1	
1	
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1	
<u> </u>	
NA	
1	
1	
	Comment of the state of the sta
C	Conversion for forest to non-forest land uses appears to be
1	extremely limited on the State Forests
1	As with most State Found ODOF: 111 1
1	As with most State Forest systems, ODOF is likely in very solid
	conformity with this Criterion
1	
1	
	No net increase in what ODOF terms "plantations"
+	To het mereuse in what opor terms prantations
1	
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	+ C +

conservation benefits across the		
forest management unit.		
All three circumstances are required to be		
met in order for forest conversion to		
occur.		
6.10.b. Justification for land-use and	+/-	Very little loss of forest cover but, as there is not yet a long-term
stand-type conversions is fully described	- -/-	management plan, compliance with this Indicator is marginal
in the long-term management plan, and		management plan, comphance with this indicator is marginar
meets the biodiversity conservation		
requirements of Criterion 6.3 (see also		
Criterion 7.1.1)		
6.10.c. Areas converted to <i>non-forest use</i>	?	How much mineral and gas development is taking place within
for facilities associated with subsurface		the State Forests? This will need to be investigated as part a full
mineral and gas rights transferred by		evaluation
prior owners, or other conversion outside		
the control of the certificate holder, are		
identified on maps. The forest owner or		
manager consults with the CB to		
determine if removal of these areas from		
the scope of the certificate is warranted.		
To the extent allowed by these		
transferred rights, the forest owner or		
manager exercises control over the		
location of surface disturbances in a		
manner that minimizes adverse		
environmental and social impacts.		
If the certificate holder at one point held		
these rights, and then sold them, then subsequent conversion of forest to non-		
forest use would be subject to Indicator		
6.10.a		
P7 A management plan appropriate to	the scale	e and intensity of the operations shall be written,
implemented, and kept up to date. The lo		objectives of management, and the means of achieving them,
shall be clearly stated. C7.1. The management plan and	NC	A "management plan" in the FSC context can be and is
supporting documents shall provide:	NC	commonly not a single bound document but, rather, a
a) Management objectives. b)		compendium of planning documents and supporting
description of the forest resources to be		technical/topical documents that collectively provide the
managed, environmental limitations,		
		direction and guidance for the management of the subject FMU
land use and ownership status, socio-		direction and guidance for the management of the subject FMU.
land use and ownership status, socio- economic conditions, and a profile of		direction and guidance for the management of the subject FMU.
		direction and guidance for the management of the subject FMU. ODOF has made some solid progress in fortifying the
economic conditions, and a profile of		ODOF has made some solid progress in fortifying the management planning system on the State Forests. There is a
economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on		ODOF has made some solid progress in fortifying the management planning system on the State Forests. There is a recently completed Strategic Plan and Forest-level management
economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on the ecology of the forest in question		ODOF has made some solid progress in fortifying the management planning system on the State Forests. There is a recently completed Strategic Plan and Forest-level management plans are in development. These provide necessary augmentation
economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through		ODOF has made some solid progress in fortifying the management planning system on the State Forests. There is a recently completed Strategic Plan and Forest-level management plans are in development. These provide necessary augmentation to the compartment review process that constitutes small-scale
economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for		ODOF has made some solid progress in fortifying the management planning system on the State Forests. There is a recently completed Strategic Plan and Forest-level management plans are in development. These provide necessary augmentation to the compartment review process that constitutes small-scale operational/tactical planning. As well there is an integration
economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species		ODOF has made some solid progress in fortifying the management planning system on the State Forests. There is a recently completed Strategic Plan and Forest-level management plans are in development. These provide necessary augmentation to the compartment review process that constitutes small-scale
economic conditions, and a profile of adjacent lands. c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring		ODOF has made some solid progress in fortifying the management planning system on the State Forests. There is a recently completed Strategic Plan and Forest-level management plans are in development. These provide necessary augmentation to the compartment review process that constitutes small-scale operational/tactical planning. As well there is an integration initiative underway.
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harvesting techniques and equipment to be used.		
7.1.a. The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by other	+	Are use or tenure rights held by others addressed somewhere?
7.1.b. The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).	+	
7.1.c.The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.	+	Is the concept of "desired future condition" incorporated into any of the planning processes?
7.1.d. The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.	+	
7.1.e. The management plan includes a description of the following resources and outlines activities to conserve and/or protect: • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9); • Other special management areas.	+	Our sense is that these topics are addressed, in one type of plan or another, but ODOF should do a gap assessment to make sure
7.1.f. If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).	?	Addressed anywhere, such as in a document that could be considered as an adjunct to the statewide strategic plan?
7.1.g. The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).	?	Same as prior comment.

7.1.1.16 -1	1 0	
7.1.h. If chemicals are used, the plan describes what is being used,	?	
applications, and how the management		
system conforms with Criterion 6.6.		
7.1.i. If biological controls are used, the	NA	It is our understanding that biological control agents are not in
management plan describes what is being		use. If they are, then they need to be addressed in a planning
used, applications, and how the		document.
management system conforms with		
Criterion 6.8.		
7.1.j. The management plan incorporates	-	This is a subject area that requires greater attention as part of the
the results of the evaluation of social		process of fortifying the planning system for the State Forests.
impacts, including:		Likely minor non-conformity.
 traditional cultural resources 		
and rights of use (see Criterion		
2.1);		
 potential conflicts with 		
customary uses and use rights		
(see Criteria 2.2, 2.3, 3.2);		
 management of ceremonial, 		
archeological, and historic sites		
(see Criteria 3.3 and 4.5);		
 management of aesthetic values 		
(see Indicator 4.4.a);		
 public access to and use of the 		
forest, and other recreation		
issues;		
 local and regional 		
socioeconomic conditions and		
economic opportunities,		
including creation and/or		
maintenance of quality jobs		
(see Indicators 4.1.b and 4.4.a),		
local purchasing opportunities		
(see Indicator 4.1.e), and		
participation in local		
development opportunities (see		
Indicator 4.1.g).		Could be fortified
7.1.k. The management plan describes the general purpose, condition and	+	Could be fortified
maintenance needs of the transportation		
network (see Indicator 6.5.e).		
7.1.l. The management plan describes the	?	Is there a written presentation that links silvicultural prescriptions
silvicultural and other management	'	with sustaining ecosystem health?
systems used and how they will sustain,		sastanning coosystem neural.
over the long term, forest ecosystems		
present on the FMU.		
7.1.m. The management plan describes	_	As discussed in C5.6, the treatment of annual or periodic
how species selection and harvest rate		allowable harvest is presently not adequate.
calculations were developed to meet the		
requirements of Criterion 5.6.		
7.1.n. The management plan includes a	?	Do the draft forest management plans explicitly include a section
description of monitoring procedures		on forest monitoring and other types of monitoring such as plan
necessary to address the requirements of		implementation monitoring and effectiveness monitoring?
Criterion 8.2.	L	
7.1.o. The management plan includes	+	
maps describing the resource base, the		
characteristics of general management		
zones, special management areas, and		
protected areas at a level of detail to		
achieve management objectives and		
protect sensitive sites.		

7.1.p. The management plan describes	-	Our sense is that this topic is not presently addressed.
and justifies the types and sizes of		
harvesting machinery and techniques		
employed on the FMU to minimize or		
limit impacts to the resource.	<u> </u>	
7.1.q. Plans for harvesting and other	+	The descriptions of environmental safeguards could be beefed
significant site-disturbing management		up.
activities required to carry out the		
management plan are prepared prior to		
implementation. Plans clearly describe		
the activity, the relationship to objectives,		
outcomes, any necessary environmental		
safeguards, health and safety measures,		
and include maps of adequate detail.		
7.1.r. The management plan describes the	?	Our impression is that, aside from documenting it, there needs to
stakeholder consultation process.		be enhanced effort at engaging in stakeholder consultation as part
		of the planning process, at all scales.
C7.2. The management plan shall be	C/NC	There needs to be evidence available to a full evaluation team
periodically revised to incorporate the		that ODOF has established a protocol for plan updates that
results of monitoring or new scientific		conforms to this Criterion. On the other hand, the plans are new
and technical information, as well as to		(still in development) and, thus, not in need of updates. Minor
respond to changing environmental,		rather than major non-conformity, accordingly.
social and economic circumstances.		and anger non comorning, accordingly.
7.2.a. The management plan shall be	+/-	See above.
	/-	See above.
reviewed on an ongoing basis and updated whenever necessary, at a		
minimum of every 10 years, to		
incorporate the results of monitoring or		
new scientific and technical information,		
as well as to respond to changing		
environmental, social and economic		
circumstances.		
C7.3. Forest workers shall receive	NC?	
adequate training and supervision to		
ensure proper implementation of the		
management plans.		
7.3.a. Workers are qualified to properly	?	Has ODOF developed procedures for training staff and
implement the management plan; All		contractors on their respective roles in implementing the State
forest workers are provided with		Forest plans?
sufficient guidance and supervision to		Totest plans:
adequately implement their respective		
components of the plan.		
C# 4 XXX II	L ~	W7
C7.4. While respecting the	C	We assume that a public summary requirement, which is the
confidentiality of information, forest		subject of this Criterion, is rendered moot by the fact that all
managers shall make publicly available		documents associated with the management of the State Forests
a summary of the primary elements of		are publicly available. But plans need to be readily available
the management plan, including those		rather than just, for instance, obtainable through "FOIA"
listed in Criterion 7.1.	1	requests.
7.4.a. While respecting landowner	+	See above
	+	See above
confidentiality, the management plan or a	+	See above
management plan summary that outlines	+	See above
	+	See above
management plan summary that outlines the elements of the plan described in	+	See above
management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public	+	See above
management plan summary that outlines the elements of the plan described in	+	See above
management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	+	
management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee. 7.4.b. Managers of public forests make	+	Have draft plans been made publicly available. Our sense is that
management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	+	

accessible for public review and		
comment prior to their implementation.		It is laudable that ODOF is moving expeditiously to develop
Managers address public comments and		these new types of plans but there remains a need to provide
modify the plans to ensure compliance		opportunities for public review and comment during the process.
with this Standard.		
with this Standard.		Does ODOF need to fortify that aspect (transparency and
D035 '4 ' 1 111 1 4 1	• ,	consultation) of their planning processes?
		to the scale and intensity of forest management to assess the
	oducts,	chain of custody, management activities and their social and
environmental impacts.		
Applicability Note: On small and medium s	rized for	ests (see Glossary), an informal, qualitative assessment may be
		quired on large forests and/or intensively managed forests.
C8.1. The frequency and intensity of	C	Overall, it is our sense that ODOF engages in a wide array of
monitoring should be determined by		monitoring activities that collectively constitute good overall
the scale and intensity of forest		conformity to this Criterion. However, there are possibly some
management operations, as well as, the		
		subject matter gaps that could trigger minor non-conformities during a full evaluation.
relative complexity and fragility of the		during a run evaluation.
affected environment. Monitoring		
procedures should be consistent and		
replicable over time to allow		
comparison of results and assessment		
of change.	. /	
8.1.a. Consistent with the scale and	+/-	In terms of clearly demonstrating conformity, it would be helpful
intensity of management, the forest		if there was a unified presentation of monitoring activities on the
owner or manager develops and		State Forests that is part of each Forest plan or the strategic plan
consistently implements a regular,		or as a stand-alone document that can be referenced in these
comprehensive, and replicable written		plans.
monitoring protocol.		
8.2. Forest management should include	C	It is our sense that ODOF will be able to demonstrate adequate
the research and data collection		conformity to this Criterion such that issuance of Major CARs is
needed to monitor, at a minimum, the		unlikely. Minor CARs may be likely, particularly with respect to
following indicators: a) yield of all		social impact monitoring
forest products harvested, b) growth		
rates, regeneration, and condition of		
the forest, c) composition and observed		
changes in the flora and fauna, d)		
environmental and social impacts of		
harvesting and other operations, and e)		
cost, productivity, and efficiency of		
forest management.		
8.2.a. Yield of all forest products		
harvested.		
8.2.a.1. For all commercially harvested	+	
products, an inventory system is		
maintained. The inventory system		
includes at a minimum: a) species, b)		
volumes, c) stocking, d) regeneration,		
and e) stand and forest composition and		
structure; and f) timber quality.		
8.2.a.2. Significant, unanticipated	+	
removal or loss or increased vulnerability		
of forest resources is monitored and		
recorded. Recorded information shall		
include date and location of occurrence,		
description of disturbance, extent and		
severity of loss, and may be both		
quantitative and qualitative		
8.2.b The forest owner or manager	+	Only non-commercial non-timber forest product utilization is
maintains records of harvested timber and		allowed, and at low levels.
NTFPs (volume and product and/or		
grade). Records must adequately ensure		
		•

are met.		
8.2.c. The forest owner or manager	+/-	Have procedures been developed for monitoring conditions in
periodically obtains data needed to		high conservation value forest areas? Same for protected areas,
monitor presence on the FMU of:		set-asides and buffer zones.
1) Rare, threatened and		3445
endangered species and/or their habitats;		Monitoring of invasive species abundance looks solid.
Common and rare plant		
communities and/or habitat; 3) Location, presence and		
abundance of invasive species;		
 Condition of protected areas, set-asides and buffer zones; 		
5) High Conservation Value Forests (see Criterion 9.4).		
8.2.d. Environmental and social impacts of harvesting and other		
operations		
8.2.d.1. Monitoring is conducted to ensure that site specific plans and	+/-	Conformity would be enhanced if there was a more formal treatment of these monitoring activities, including documentation
operations are properly implemented,		and presentation of monitoring results.
environmental impacts of site disturbing		
operations are minimized, and that		
harvest prescriptions and guidelines are		
effective.		
8.2.d.2. A monitoring program is in	+/-	Could be more formalized; perhaps needs to be more formalized
place to assess the condition and		(possible minor CAR)
environmental impacts of the forest-road		
system.		
8.2.d.3. The landowner or manager	-	This is presently a gap that needs to be addressed in order to
monitors relevant socio-economic issues		avoid a non-conformity, probably minor but possibly major.
(see Indicator 4.4.a), including the social		
impacts of harvesting, participation in		
local economic opportunities (see		
Indicator 4.1.g), the creation and/or		
maintenance of quality job opportunities		
(see Indicator 4.1.b), and local		
purchasing opportunities (see Indicator		
4.1.e).		
8.2.d.4. Stakeholder responses to	+/-	A unified description of how stakeholder responses our received,
management activities are monitored and		acted upon and how the general process of stakeholder input is
recorded as necessary.		monitored would help to avoid a non-conformity during a full
<u> </u>		evaluation
8.2.d.5. Where sites of cultural	-	As discussed in P3, this is presently a non-conformity
significance exist, the opportunity to		
jointly monitor sites of cultural		
significance is offered to tribal		
representatives (see Principle 3).		
8.2.e. The forest owner or manager	+	
monitors the costs and revenues of		
management in order to assess		
productivity and efficiency.	NC	A "etumn to gata" chain of quetody system, as simple as it may
C8.3. Documentation shall be provided by the forest manager to enable	NC	A "stump to gate" chain of custody system, as simple as it may be, still needs to be developed and documented. The biggest
monitoring and certifying		point of risk that requires control is the log sale yards.
organizations to trace each forest		
product from its aniain a process		
product from its origin, a process known as the "chain of custody."		

	ı	
8.3.a. When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	-	See above
	NICO	T- 41
C8.4. The results of monitoring shall	NC?	Is there an adaptive feedback loop expressly incorporated into the
be incorporated into the		strategic plan and the Forest plans?
implementation and revision of the		
management plan.		
8.4.a. The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	?/-	Has ODOF developed a plan implementation and a plan effectiveness monitoring protocol/approach? It is needed in order to demonstrate adequate conformity to this Indicator.
8.4.b. Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.	?/-	See prior comment
C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	NC	There does not appear to be adequate conformity to this Criterion at the moment. Possible major non-conformity.
8.5.a. While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	-	At present, it is our judgment that ODOF does not comply with this Indicator. We are not aware of a compiled, comprehensive presentation of periodic monitoring results, or a condensed summary thereof.

P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

High Conservation Value Forests are those that possess one or more of the following attributes:

- a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance
- b) Forest areas that are in or contain rare, threatened or endangered ecosystems

- Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)
- d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

Examples of forest areas that may have high conservation value attributes include, but are not limited to:

Central Hardwoods:

- Old growth (see Glossary) (a)
- Old forests/mixed age stands that include trees >160 years old (a)
- Municipal watersheds –headwaters, reservoirs (c)
- Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)
- Intact forest blocks in an agriculturally dominated landscape (refugia) (a)
- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens (c)
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern (b)

Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.

In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.

Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.

Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.

Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.

C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	C/NC	
9.1.a. The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU,	+/-	A HCVF zone has been developed but the protocols by which the tracts in that zone were identified is not adequately documented

in a manner consistent with the		
assessment process, definitions, data		
sources, and other guidance described in		
Appendix F.		
Given the relative rarity of old growth		
forests in the contiguous United States,		
these areas are normally designated as		
HCVF, and all old growth must be		
managed in conformance with Indicator		
6.3.a.3 and requirements for legacy trees		
in Indicator 6.3.g.		
9.1.b. In developing the assessment, the	_	It is our sense that there has been inadequate stakeholder and
forest owner or manager consults with		specialist consultation, to date, in the development and
qualified specialists, independent experts,		population of the HCVF zone layer.
and local community members who may		population of the rie vi Zone layer.
have knowledge of areas that meet the		
definition of HCVs.		
9.1.c. A summary of the assessment	?/-	Do the Forest plans include a section on HCVF's?
results and management strategies (see	1/-	Do the Polest plans meduce a section on TCVF 8?
Criterion 9.3) is included in the		
management plan summary that is made		
available to the public.	NIC	The wending of this indicates is confusion in 1.1.
C9.2. The consultative portion of the	NC	The wording of this indicator is confusing as it should not be
certification process must place		referring to the "certification process," as is made obvious in the
emphasis on the identified		Indicators for this Criterion.
conservation attributes, and options		I.: (1.000F)
for the maintenance thereof.		It is our sense that ODOF cannot presently demonstrate adequate
0.2 - The female and		conformity to this Criterion—possible major non-conformity
9.2.a. The forest owner or manager holds	-	It is not apparent what stakeholder consultation, if any, has been
I		Landantalan as most af ODOE's HOVE initiation to date
consultations with stakeholders and		undertaken as part of ODOF's HCVF initiative, to date.
experts to confirm that proposed HCVF		undertaken as part of ODOF's HCVF initiative, to date.
experts to confirm that proposed HCVF locations and their attributes have been		undertaken as part of ODOF's HCVF initiative, to date.
experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate		undertaken as part of ODOF's HCVF initiative, to date.
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operational plans describe the measures		attributes as well as a process for identifying areas that possess
necessary to ensure the maintenance		the defined attributes. But there is no discussion or guidance on
and/or enhancement of all high		what sort of management actions/measures are consistent with
conservation values present in all		maintaining or enhancing the defined conservation attributes.
identified HCVF areas, including the		
precautions required to avoid risks or		Likely major non-conformity if nothing is developed prior to a
impacts to such values (see Principle 7).		full evaluation
These measures are implemented.		
9.3.b. All management activities in	_	See prior comment
HCVFs must maintain or enhance the		•
high conservation values and the extent		
of the HCVF.		
9.3.c. If HCVF attributes cross ownership	_	ODOF personnel have acknowledged during the pre-assessment
boundaries and where maintenance of the		that there is little consideration of forest conditions and
HCV attributes would be improved by		landowners actions on neighboring properties. This limited
coordinated management, then the forest		frame of reference runs counter to this Indicator.
owner or manager attempts to coordinate		
conservation efforts with adjacent		Possible major non-conformity.
landowners.		,
C9.4. Annual monitoring shall be	C/NC	Presently, we do not believe that ODOF has a monitoring
conducted to assess the effectiveness of		component directly focused on HCVF management. But we see
the measures employed to maintain or		it as a relatively easy gap to address, prior to a full evaluation.
enhance the applicable conservation		y and y and y and y
attributes.		
9.4.a. The forest owner or manager	_	A system needs to be designed and documented.
monitors, or participates in a program to		g
annually monitor, the status of the		
specific HCV attributes, including the		
effectiveness of the measures employed		
for their maintenance or enhancement.		
The monitoring program is designed and		
implemented consistent with the		
requirements of Principle 8.		
9.4.b. When monitoring results indicate	-	See prior comment
increasing risk to a specific HCV		
attribute, the forest owner/manager re-		
evaluates the measures taken to maintain		
or enhance that attribute, and adjusts the		
management measures in an effort to		
reverse the trend.		

P10 Plantations shall be planned and managed in accordance with Principles and Criteria 1 9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.

The FSC-US Plantations Working Group is currently reviewing P10; a draft will be made available for review shortly.

Regardless of the state of P10 in the development of a U.S. national standard, we conclude that the ODOF's forest management/silvicultural regimes clearly do not meet the FSC's international definition of "plantation forest management." Accordingly, the entirety of Principle 10 is not applicable to the evaluation of the Ohio State Forest system.

ODOF manages legacy stands of conifer trees (mostly white pine and red pine) that were planted beginning in the 1930's in the CCC era. There are several thousand acres of these stands and they are mostly, at this juncture, aesthetic features on the landscape. ODOF has a policy to address these stands as they mature and are replaced by predominately natural hardwood regeneration.

APPENDIX I: Attendance list (confidential)

List of ODNR Staff and Others Consulted during the Pre-Assessment

See the list in Section 2.3 of this report.

List of State and Federal Government Representatives Consulted

See the list in Section 2.3 of this report.

List of Community Members Consulted

Community members that made contact with SCS were not asked if their names could be included in the pre-assessment report. Accordingly, we are not including those names, here.

List of Conservation Group Representatives Consulted

See the list in Section 2.3 of this report.

List of Others Consulted

No other individuals were consulted.