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 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 Administrator		
Address:	ODNR-Division of Forestry 2045 Morse Road, Bldg H-1 Columbus, Ohio 43229-6693	**Tel:**	614-265-6701
		Fax:	614-447-9231
		Email:	Chad.Sanders@dnr.state.oh.us
		Website:	http://www.dnr.state.oh.us/DivisionofForestryHomepage/tabid/4803/Default.aspx

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 forest” 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 un-glaciated 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 under evaluation.	50

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

Day 1 Schedule (Group discussions at ODOF Central Office, Columbus)

- 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 Considerations
- 4:30 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 pre-assessment 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.

Principle/Subject Area	Possible Gaps /Non-Conformities
P1: FSC Commitment and Legal Compliance	• ODOF could improve its procedures for maintaining public transparency 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
P2: Tenure & Use Rights & Responsibilities	No potential non-conformities were identified relative to this Principle during the pre-assessment
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 management system • ODOF does not, in a culturally appropriate manner, consult with pertinent 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 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 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 consideration to the bulleted items Indicator 5.6.a as it designs *and documents* an allowable harvest planning process
P6: Environmental Impact	• Assessments of environmental impacts need to be strengthened; the 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 eco-regions 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 • Biomass retention guidelines need to be developed for biomass and whole tree harvesting operations
P7: Management	• The State Forest Plans are still under development

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 High Conservation Value Forest	A start has been made with the establishment of the zoning of the State Forests that includes a HCVF zone. But there remain substantial gaps relative to: • 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 (CoC) Requirements	DNR will need to develop and document forest "stump to gate" chain of 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/NC	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 all national and local laws and administrative requirements.	**C**	Public transparency (availability of planning and management documents through means other than FOIA requests) may need to be improved
1.1.a. ***Forest*** management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and ***administrative requirements*** (e.g., regulations). Violations, outstanding complaints or investigations are provided to the ***Certifying Body*** (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 ***forest owner*** or ***manager*** 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 prescribed fees, royalties, taxes and other charges shall be paid.	**C**	No evidence of possible non-conformities emerged during the pre-assessment
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.	**C**	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,

with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.		asking the DNR to generate a written statement or policy, endorsed by the State Forester, that any such conflicts will be brought to the attention of SCS.
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	**C**	A full evaluation is likely to confirm adequate overall conformity with this Criterion However, illegal ATV use is an issue that will be investigated further during a full evaluation
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the ***Forest Management Unit*** (FMU).	+	The Division has a law enforcement branch which, in itself, is a preventative measure to minimize illegal activities. The Division and Department also employ public education mechanisms to reduce illegal or unauthorized activities It is our sense that illegal activities are not widespread, with the exception of the illegal ATV use (see next Indicator)
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	+/-	Actions are implemented to control illegal ATV use but illegal use is characterized as "widespread but not out of control." We consider this to be a contradictory statement and a possible indication of a non-conformity or, at a minimum, an OFI (opportunity for improvement)
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	**C/NC**	This is also a primarily forward looking Criterion. So it is unlikely that a major non-conformity would be detected in a full evaluation. However, minor non-conformities are more likely.
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	-	Likely minor non-conformity unless the ODOF issues a publicly available written statement of commitment to manage the State Forests in compliance with the FSC certification standards
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	+	All of the lands managed by the Division of Forestry are intended to be included in the scope of the certification evaluation. Even if the lands managed by the other DNR divisions were considered part of the "forest estate," our strong sense is that the management of these other lands would not constitute any non-conformity with FSC-POL-20-002
1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	+	Conformity with this Indicator would be more readily assured if the DNR issued a policy that it will notify SCS of any changes in the land area under certification.
P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	**C**	Conformity with the core of this Criterion appears to be beyond any doubt
2.1.a. The forest owner or manager provides clear evidence of ***long-term*** rights to use and manage the FMU for the purposes described in the management	+	

plan.		
2.1.b. The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.	+/-	Evidence that DNR has cataloged all such established rights would help in establishing conformity to this Indicator during a full evaluation
2.1.c. Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.	+	It is our understanding that DNR does in fact mark boundaries, as required in this Indicator
C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or 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.*	**C**	No evidence to suggest that DNR, as a duly established state agency with public trust management responsibilities, is operating in a manner that conflicts with or ignores customary tenure or use rights
2.2.a. The forest owner or manager allows the exercise of ***tenure*** and ***use rights*** allowable by law or regulation.	+	Conformity is highly likely to be confirmed in a full evaluation
2.2.b. In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.	+	Regardless established tenure or use rights, DNR engages in public dialogue about its management policies and practices. However, and as addressed elsewhere in this Standard, DNR may need to enhance its approach to consultation as distinct from public transparency and information sharing. As a public agency, 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 employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	C	Available administrative appeals and the availability of the Ohio state court system probably constitute adequate conformity. It is our sense that there are no active disputes over tenure claims and use rights. If there are, they need to be made known to the full evaluation team.
2.3.a. If ***disputes*** arise regarding tenure claims or use rights then the forest owner 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.	+	DNR appears to have a long standing commitment to open dialogue
2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.	+	Conformity would be enhanced if a register of such disputes over tenure or use rights were maintained
P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control	**NA**	

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

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.		
P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	**C**	The Division appears to be operating at a high level of conformity to this Criterion
4.1.a. Employee compensation and hiring practices meet or exceed the prevailing ***local*** norms within the forestry industry.	+	Anecdotal evidence gathered during the pre-assessment suggests adequate conformity with this Indicator, especially when the overall compensation package (salary plus benefits) is considered
4.1.b. Forest work is offered in ways that create high quality job opportunities for employees.	+	Same as above
4.1.c. Forest workers are provided with fair wages.	+	Same as above
4.1.d. Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.	+	Assured by state and federal law and Departmental policy
4.1.e. The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.	+	Most DNR employees are Ohio natives; most service and product vendors with which DNR does business are Ohio based
4.1.f. Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.	+	While our exposure to the Division's and the Department's public education programs was very limited during the pre-assessment, our sense is that there are no issues here with regard to possible non-conformities, but additional evidence should be made available to the full evaluation team that will enable a finding of conformity
4.1.g. The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.	+	The Division's urban forestry program is responsive to this Indicator There are also Departmental-level activities that likely contribute to the establishment of adequate conformity.
C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	**C**	Available evidence suggest adequate overall conformity with this Criterion such that a Major CAR is an unlikely outcome of a full evaluation
4.2.a. The forest owner or manager shall meet or exceed all applicable laws and/or regulations covering health and safety of employees (see Criterion 1.1).	+	Available evidence suggests conformity
4.2.b. The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	+	The pre-assessment field tour revealed nothing to suggest issues with regard to this Indicator But what safety requirements apply to contractors? This will be 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.	?	Insufficient evidence gathered during the pre-assessment to support a preliminary judgment; this will be examined during a full evaluation
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**	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 evaluation, findings of major non-conformities are likely
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.	-	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 they may express concern.	-	Public notices look to be pretty good though some stakeholders feel otherwise (e.g., advance notice of prescribed fires) Likely non-conformity
4.4.d. For ***public forests,*** 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 public.	-	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
C4.5. Appropriate mechanisms shall be 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 peoples. Measures shall be taken to avoid such loss or damage.	**C/NC**	While there are some high profile controversies associated with a 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. 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 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 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	+/-	It is our impression that Division managers and other personnel maintain open dialogue. 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. Possible minor non-conformity

records of the dispute resolution process.		
4.5.c. Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.	+	The existence and availability of the state court system looks to be sufficient demonstration of conformity with this Indicator Are there Divisional level mechanisms by which compensation, if warranted, can be determined and issued?
P5 Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
C5.1. Forest management should strive 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.	**C**	It is our sense that adequate overall conformity to this Criterion is likely to be confirmed in a full evaluation.
5.1.a. The forest owner or manager is financially able to implement core management activities, including all those required to meet this Standard, and investment and reinvestment in forest management.	+/-	Years of budget and concomitant staff reductions obviously clash 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.	**C**	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.	**C**	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.	**C**	
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 *on the State Forests* 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 outdoor recreation
C5.6. The rate of harvest of forest products shall not exceed levels that can be permanently sustained.	**C/NC**	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
P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.		
C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments	**C/NC**	It is likely that a full evaluation will reveal a need for ODOF to fortify its environmental impact assessment approaches. However, we consider it likely that it will be a minor rather than a major non-conformity as there are impact methods in place, albeit of a form and substance that probably does not adequately comply with this Criterion

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 ***credible scientific analysis, best available information*** (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes: 1) 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; 4) Water resources and associated riparian habitats and hydrologic functions; 5) ***Soil resources***; and 6) ***Historic conditions*** 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.	+/-	The 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
6.1.b. Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a. 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.	+/-	The compartment review process does constitute a form of pre-disturbance impact assessment ; however, it is marginally adequate relative to the depth and scope of the impact assessment expected in this
6.1.c. Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance	+/-	Conformity will be improved if the link between impact assessments and management prescriptions is clarified and fortified

the long-term ecological viability of the forest.		
6.1.d. On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.	-	At present, it does not appear that ODOF's management systems adequately comply with this Indicator. A minor non-conformity is a likely outcome of a full evaluation.
C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). 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.	**C**	Available evidence gathered during the pre-assessment does not suggest that ODOF is failing to provide basic coverage of listed species management. This will be investigated in more depth during a full evaluation
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. 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.	+	
6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. ***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.	+	Departmental personnel appear to be appropriately cognizant of RTE management issues including which species are likely present on the State Forests
6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity	?/+	The Indiana Bat management strategy is evidence of conformity to this Indicator. Are all other endangered species found on the State Forests receiving comparable management attention?

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.	**C**	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 ***successional*** 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 ***rare ecological community*** 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, ***conservation zones*** and/or ***protected areas*** 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 ***Type 1*** and ***Type 2 old growth***. 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. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other	+	No evidence of potential non-conformity to this Indicator was revealed during the pre-assessment

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). 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 size of the ownership, particularly on larger ownerships (generally tens of 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.	+	This will be examined in more detail during a full evaluation, but the preliminary sense is that ODOF management is consistent with this Indicator
6.3.c. Biological legacies of the forest	+/-	More formal and robust in-stand retention policies would be

community are retained at the forest and 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.		helpful
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. ***Native species*** 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, ***snags***, and well-distributed coarse down and dead woody material. ***Legacy trees*** where present are not harvested; and b) vertical and horizontal complexity. Trees selected for ***retention*** 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 landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan: 1. 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.	+/-	We are not aware of evidence to support conformity to this Indicator
6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control ***invasive species***, including: 1. a method to determine the 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.	+	ODOF in collaboration with other Divisions is actively taking measures to control the spread of invasive exotics The use of chemical herbicides in the context of controlling invasive exotics is fundamentally more compatible with FSC "values" than is chemical use as a standardized silvicultural tool

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 existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.**	**NC**	ODOF has not yet undertaken the landscape-level gap analysis of ecological reference areas, as required in this Criterion. In the absence of completing or at least substantially initiating the analytical steps required in this Criterion by the time of a full evaluation, it is likely that a major CAR would be issued.
6.4.a. The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the ***landscape*** (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) ***GAP analyses***; b) collaboration with state natural heritage 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. .	-	The required GAP analysis needs to be undertaken Any other DNR-managed lands, outside of the State Forest System, that qualify as ecological reference areas can be counted in the GAP analysis The Natural Area zone designation is responsive to this Criterion; the basis for enrolling areas into that zone needs to be along the lines of what is required in this Criterion
6.4.b. Where existing areas within the landscape, but external to the FMU, are 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.	-	The ODOF estate meets the FSC definition of a "large FMU" so pay attention to this Indicator
6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA 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	+	ODOF's description, found in Chapter 2 of its Manual, of allowed/planned uses within Zone 1 lands looks to be compatible with this Indicator

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 minimized. • Soil erosion is not accelerated.	+	Available evidence suggests that a full evaluation would reveal adequate conformity to this Indicator

• 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; • 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 ***Streamside Management Zone*** (SMZ) ***buffer*** 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

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

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.		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
6.6.a. No products on the FSC list of Prohibited Pesticides are used (see FSC-GUI-30-001 v2).	+	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 written prescription is prepared that 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.	?	Are written prescriptions prepared? If not, this would be a minor non-conformity.
6.6.e. If chemicals are used, the effects 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.	?	What, if any, post-application monitoring is undertaken?
C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	**C/NC**	ODOF's general expectations regarding contractor performance are compatible with this Criterion. However, more explicit contact requirements would help to demonstrate conformity. Without changes being made prior to a full evaluation, a minor non-conformity is likely.
6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	+/-	Spill kits are not required in contractor vehicles which is incompatible with this Indicator
6.7.b. In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	+/-	Spill kits are not required in contractor vehicles which is incompatible with this Indicator Is there a contract term that obligates a contractor to immediately respond in the event of a spill?
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in 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.	+/-	What are ODOF's policies with regard to storage of fluids for their own fleet of vehicles and equipment?
C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	**C**	No GMO's are in use on the State Forests Biological control agent use is limited to R&D; no operational use
6.8.a. Use of ***biological control agents*** are used only as part of a pest management strategy for the control of invasive plants, ***pathogens***, insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent	+	No operational deployment Lots of screening before their use IPM is employed on the State Forests

upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.		
6.8.b. If biological control agents are used, they are applied by trained workers using proper equipment. Their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.	+	
6.8.c. Genetically Modified Organisms (GMOs) are not used for any purpose.	+	No GMO's. A written policy that GMO's will not be deployed on the State Forests would enhance conformity to this Indicator
C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	**C**	Conformity to this Criterion is likely to be confirmed during a full evaluation
6.9.a. The use of ***exotic species*** is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	+	We were informed that ODOF does not use exotic species
6.9.b. The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species.	NA	
C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.	**C**	Conversion for forest to non-forest land uses appears to be extremely limited on the State Forests As with most State Forest systems, ODOF is likely in very solid conformity with this Criterion
6.10.a. Forest ***conversion*** to ***plantations*** or non-forest land uses shall not occur, except in circumstances where conversion: a) entails a very limited portion of the forest management unit; and b) does not occur on high conservation value forest areas; and c) will enable clear, substantial, additional, secure, long term	+	No net increase in what ODOF terms "plantations"

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 stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)	+/-	Very little loss of forest cover but, as there is not yet a long-term management plan, compliance with this Indicator is marginal
6.10.c. Areas converted to ***non-forest use*** for facilities associated with subsurface mineral and gas rights transferred by 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	?	How much mineral and gas development is taking place within the State Forests? This will need to be investigated as part a full evaluation
P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.		
C7.1. The management plan and supporting documents shall provide: a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-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 of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species. h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of	**NC**	A "management plan" in the FSC context can be and is commonly not a single bound document but, rather, a compendium of planning documents and supporting technical/topical documents that collectively provide the direction and guidance for the management of the subject FMU. 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. But, at present, the status of the State Forest planning system probably does not constitute adequate conformity to this Criterion. Were nothing else accomplished prior to a full evaluation, it is possible that a major non-conformity/Major CAR would be issued. But if further progress is made in developing and finalizing the Forest-level plans prior to a full evaluation and if this further development included additional stakeholder consultation and if there was expansion of the plan contents to address all of the subject areas enumerated in this Criterion, then it is our sense that a minor non-conformity/Minor CAR may result, instead.

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.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 management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.	NA	It is our understanding that biological control agents are not in use. If they are, then they need to be addressed in a planning document.
7.1.j. The management plan incorporates the results of the evaluation of social impacts, including: • 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).	-	This is a subject area that requires greater attention as part of the process of fortifying the planning system for the State Forests. Likely minor non-conformity.
7.1.k. The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).	+	Could be fortified
7.1.l. The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.	?	Is there a written presentation that links silvicultural prescriptions with sustaining ecosystem health?
7.1.m. The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.	-	As discussed in C5.6, the treatment of annual or periodic allowable harvest is presently not adequate.
7.1.n. The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	?	Do the draft forest management plans explicitly include a section on forest monitoring and other types of monitoring such as plan implementation monitoring and effectiveness monitoring?
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 and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.	-	Our sense is that this topic is not presently addressed.
7.1.q. Plans for harvesting and other significant site-disturbing management 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.	+	The descriptions of environmental safeguards could be beefed up.
7.1.r. The management plan describes the stakeholder consultation process.	?	Our impression is that, aside from documenting it, there needs to be enhanced effort at engaging in stakeholder consultation as part of the planning process, at all scales.
C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	**C/NC**	There needs to be evidence available to a full evaluation team that ODOF has established a protocol for plan updates that conforms to this Criterion. On the other hand, the plans are new (still in development) and, thus, not in need of updates. Minor rather than major non-conformity, accordingly.
7.2.a. The management plan shall be 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.	+/-	See above.
C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	**NC?**	
7.3.a. Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	?	Has ODOF developed procedures for training staff and contractors on their respective roles in implementing the State Forest plans?
C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	**C**	We assume that a public summary requirement, which is the subject of this Criterion, is rendered moot by the fact that all documents associated with the management of the State Forests are publicly available. But plans need to be readily available rather than just, for instance, obtainable through "FOIA" requests.
7.4.a. While respecting landowner confidentiality, the management plan or a 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.	+	See above
7.4.b. Managers of public forests make draft management plans, revisions and supporting documentation easily	-	Have draft plans been made publicly available. Our sense is that ODOF may have some issues with respect to making draft plans available for review and public comment.

accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.		It is laudable that ODOF is moving expeditiously to develop these new types of plans but there remains a need to provide opportunities for public review and comment during the process. Does ODOF need to fortify that aspect (transparency and consultation) of their planning processes?
P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts. *Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.*		
C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	**C**	Overall, it is our sense that ODOF engages in a wide array of monitoring activities that collectively constitute good overall conformity to this Criterion. However, there are possibly some subject matter gaps that could trigger minor non-conformities during a full evaluation.
8.1.a. Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.	+/-	In terms of clearly demonstrating conformity, it would be helpful if there was a unified presentation of monitoring activities on the State Forests that is part of each Forest plan or the strategic plan or as a stand-alone document that can be referenced in these plans.
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all 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.	**C**	It is our sense that ODOF will be able to demonstrate adequate conformity to this Criterion such that issuance of Major CARs is unlikely. Minor CARs may be likely, particularly with respect to social impact monitoring
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 maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6	+	Only non-commercial non-timber forest product utilization is allowed, and at low levels.

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

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
C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.	**NC?**	Is there an adaptive feedback loop expressly incorporated into the strategic plan and the Forest plans?
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**		

c) 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 forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.	-	It is our sense that there has been inadequate stakeholder and specialist consultation, to date, in the development and population of the HCVF zone layer.
9.1.c. A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	?/-	Do the Forest plans include a section on HCVF's?
C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	**NC**	The wording of this indicator is confusing as it should not be referring to the "certification process," as is made obvious in the Indicators for this Criterion. It is our sense that ODOF cannot presently demonstrate adequate conformity to this Criterion—possible major non-conformity
9.2.a. The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.	-	It is not apparent what stakeholder consultation, if any, has been undertaken as part of ODOF's HCVF initiative, to date.
9.2.b. On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	-	This Indicator only serves to further highlight the need for a consultative component of the Division's HCVF initiative. Chapter 2 of the Manual briefly describes how stakeholder consultation will take place: Areas recommended to be zoned as Class 1 are disseminated to our stakeholders, and the public at-large for review. During this review, stakeholders may also propose new areas as well as propose the management options for the Class 1 zone. (Clarification: a process is already in place by code to update and review the Shawnee wilderness plan – Zone Class 1C – and therefore meets the intent of this assessment process.) This is good, but has it actually been implemented? Our understanding is that it hasn't, yet.
C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	**NC**	
9.3.a. The management plan and relevant	-	Manual Chapter 2 addresses HCVF and provides some defining

operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.		attributes as well as a process for identifying areas that possess the defined attributes. But there is no discussion or guidance on what sort of management actions/measures are consistent with maintaining or enhancing the defined conservation attributes. Likely major non-conformity if nothing is developed prior to a full evaluation
9.3.b. All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	-	See prior comment
9.3.c. If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	-	ODOF personnel have acknowledged during the pre-assessment that there is little consideration of forest conditions and landowners actions on neighboring properties. This limited frame of reference runs counter to this Indicator. Possible major non-conformity.
C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	**C/NC**	Presently, we do not believe that ODOF has a monitoring component directly focused on HCVF management. But we see it as a relatively easy gap to address, prior to a full evaluation.
9.4.a. The forest owner or manager monitors, or participates in a program to 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.	-	A system needs to be designed and documented.
9.4.b. When monitoring results indicate 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.	-	See prior comment

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.