



SmartWood

Practical conservation through certified forestry

Forest Management
Test Evaluation Report

Allegheny National Forest
in
Pennsylvania, USA

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Evaluation Team:

Chris Nowak, Lead Auditor and
Forester

Stephen Grado, Socio-Economist

Dave deCalesta, Ecologist

Don Taylor, Forester, Co-Leader

Operation Contact: Lois DeMarco,

Address: Allegheny National Forest,

P.O. Box 847,

Warren, Pennsylvania 16365

Test Evaluation

Performed by:

SmartWood US Region

101 East Fifth Street, Suite 208

Northfield, MN 55057

Tel: 507.663.1115

Fax: 507.663.7771

Contact person: Dave Bubser

dbubser@ra.org

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ACRONYMS

AAC	Annual Allowable Cut
ADR	Alternative Dispute Resolution
ANF	Allegheny National Forest
ARPA	Archaeological Resource Protection Act
ASQ	Allowable Sale Quantity
ATV	All-terrain vehicle
BMPs	Best Management Practices
CARs	Corrective Action Requests
CITES	Convention on Trade in Endangered Species
CoC	Chain-of-Custody
DMAP	Deer Management Assistance Program
DCNR	Department of Conservation and Natural Resources
DOD	Department of Defense
DOE	Department of Energy
DEIS	Draft Environmental Impact Statement
EA	Environmental Assessment
EIS	Environmental Impact Statement
ELT	Ecological Land Types
EOEA	Equal Opportunity Employment Act
FCPA	Forest Cutting Practices Act
FMO	Forest Management Organization
FMU	Forest Management Unit
FOIA	Freedom of Information Act
FSC	Forest Stewardship Council
FSH	Forest Service Handbook
FSM	Forest Service Manual
GIS	Geographic Information System
HCVF	High Conservation Value Forest
ILO	International Labour Organization
IPM	Integrated Pest Management
IRPG	Incident Response Pocket Guides
JHA	Job Hazard Analysis
LHR	Lumber Heritage Region
LRMP	Land and Resource Management Plan
MA	Management Area
MSDS	Material Safety Data Sheets
MUTCD	Manual on Uniform Traffic Control Devices
NC	Non-conformance
NEPA	National Environmental Policy Act
NFMA	National Forest Management Act
NTFP	Non-timber Forest Products
NVUM	National Visitor Use Monitoring study
OGM	Oil and Gas Management
OSHA	Occupational Safety and Health Administration
OWCP	Office of Workers Compensation
P&C	Principles and Criteria of the FSC
PGC	Pennsylvania Game Commission
PIC	Pinchot Institute for Conservation
PLRMP	Proposed Land and Resource Management Plan
PNDI	Pennsylvania Natural Diversity Index

PPE	personal protective equipment
PwC	PricewaterhouseCoopers
ROPS	Regional Operation Program
RT&E	Rare, threatened, and endangered
SFI	Sustainable Forestry Initiative
SHPO	State Historic Preservation Officer
SMZs	Streamside Management Zones
SNI	Seneca Nation of Indians
SW	SmartWood
USDA	United States Department of Agriculture

Standard Conversions

1 acre = 0.405 hectares
 1 foot = 0.3048 Meters
 1 mile = 1.60934 Kilometers

1 mbf = 5.1 m³
 1 cord = 2.55 m³
 1 Gallon (US) = 3.78541 Liters

INTRODUCTION

The Allegheny National Forest (ANF), in northwestern Pennsylvania, USA, is participating in a test evaluation of the applicability of third party forest certification on United States Department of Agriculture (USDA) Forest Service lands. This independent study was initiated by the Pinchot Institute for Conservation (PIC). The study will provide a test evaluation of current management on the national forests of the United States with respect to the Forest Stewardship Council (FSC) standards and the SmartWood (SW) forest management evaluation processes. The project will include case studies on six forests within the National Forest System. The ANF is one of the first two forests to be studied, with the other being the Lakeview Forest Sustainability Unit on the Fremont-Winema National Forest in Oregon.

This case study began with a test pre-evaluation of the ANF. This test pre-evaluation was carried out by the SmartWood Program of the Rainforest Alliance to determine if the ANF management meets the requirements of the SmartWood program and the FSC certification standards. In addition to the test evaluation by SmartWood, PricewaterhouseCoopers (PwC) is conducting a parallel test evaluation of the ANF using the Sustainable Forestry Initiative (SFI) standards and auditing system. These two test evaluations have been completed concurrently with a single, merged audit team.

This report presents the findings of an independent test evaluation conducted by a team of specialists representing the SmartWood Program of the Rainforest Alliance. The purpose of the test evaluation was to assess the ecological, economic and social sustainability of the Allegheny National Forest (ANF) forest management using standards defined by the Forest Stewardship Council (FSC). Specifically, this test evaluation has been conducted using FSC Regional Standards, FSC-U.S. Department of Defense (DOD)/Department of Energy (DOE) Standards and Additional Considerations developed by SmartWood specifically for the ANF test evaluation.

This report contains four main sections of information and findings and several appendixes. The entire report plus Appendixes I and II will become public information about the forest management operation that may be distributed by SmartWood to interested parties. The remainder of the appendixes are confidential, to be reviewed only by authorized SmartWood staff and reviewers bound by confidentiality agreements.

The purpose of the SmartWood Program is to recognize conscientious land stewardship through independent evaluation of forestry practices.

Findings contained in this report are the results of an independent evaluation of the management of a National Forest, which has been commissioned by the PIC. The findings are not determinations of conformance with FSC requirements as would be reported for a landowner qualified to seek certification. The USDA Forest Service and any other party may not: (a) use the names, logos, seals, certification marks or trademarks, or evaluation systems or procedures, of the contracting firm(s) or the FSC certification program for any purpose whatsoever, including, without limitation, the marketing, sale or promotion of any forest products; or (b), make any claim of conformity or near conformity with FSC requirements or any portion thereof, or any other operation, until and unless a certificate is awarded by an FSC accredited firm subject to a qualified FSC certification assessment.

FSC certification is explicitly outside the scope of this project.

1. SCOPE OF THE TEST EVALUATION

1.1. Scope of the test evaluation

The following text was modified from ANF “Land and Resource Management Plan” (Alternative D – Final Environmental Impact Statement), Eastern Region, USDA-Forest Service, dated March 1986 (see “Forest Description”, p. 1-2).

The ANF is Pennsylvania’s only National Forest comprising over 200,000 hectares of land in northwestern Pennsylvania. The Forest area is generally contiguous with 85,000 hectares of private and public lands interspersed within the nearly 285,000 hectare proclamation boundary.

The Forest was established in September 1923, with ownership of surface rights being of principal concern. Title to the oil, gas, and mineral rights was viewed with secondary concern and acquired on only a small percentage of tracts during the early decades of Forest acquisition.

The ANF lies within Elk, Forest, McKean, and Warren Counties. The Forest is adjacent to several large metropolitan areas including Erie to the west, Buffalo to the northwest, Pittsburgh to the south, and the Youngstown-Akron-Cleveland area to the west. It is from these areas that the ANF attracts most of its recreational clientele and other forest users. Several Pennsylvania Department of Conservation and Natural Resources (DCNR) State Forests and Pennsylvania Game Commission (PGC) State Game Lands are adjacent to or near the ANF, and two PGC Game Lands and one DCNR State Park are within the ANF. Additionally a significant acreage of large industrial, forest investment, and watershed authority forestlands lie within the ANF.

The Forest is situated in the rugged plateau country of northwestern Pennsylvania. The topography is characterized by flat to rolling plateaus frequently dissected by stream valleys. These valleys are sometimes steep. The land is timbered and helps support local industries with fine hardwood timber such as black cherry, maple, ash, and oak. Tens of millions of board-feet of timber are annually harvested. Watersheds provide high-quality water supplies for local communities and habitat for white-tailed deer, squirrels, rabbits, turkeys, grouse, non-game species, and predators such as black bear, coyote, bobcat and fox. At least 49 different mammals, 140 different birds, and 35 different reptiles and amphibians are common to the ANF. Water is a plentiful resource with several reservoirs and over 500 miles of streams available. These provide for a variety of fishing and hunting experiences. Opportunities for forest-based recreation are both numerous and diverse. Many kilometers of trails exist for the hiker, cross-country skier, all-terrain vehicle (ATV) user, and snowmobiler. Developed recreation facilities include beaches, boat launches, campgrounds, overlooks, and picnicking areas. Many of these facilities are located around the 3,000-hectare Allegheny Reservoir on the upper Allegheny River.

See more detailed information about the FMO and areas addressed by the evaluation in Appendix I and II.

1.2. Exclusion of areas from the scope of evaluation

All of the Allegheny National Forest was included in the test evaluation with no areas excluded from the scope of evaluation.

2. TEST EVALUATION PROCESS

2.1. Evaluation Standards Used

The test evaluation was carried out using an integrated standard developed specifically for this project. This integrated standard is comprised of: 1) the applicable FSC regional standard; 2) the FSC-U.S. Indicators for U.S. Department of Defense (DOD) and Department of Energy (DOE) forests; and, 3) a set of “Additional Considerations” that were developed by SmartWood as a distinct element of this test evaluation. The FSC Regional Forest stewardship standard was merged with the FSC-US DOD/DOE standard and the 19 “Additional Considerations” to form a single standard. This merged standard was used by the SmartWood/PwC test evaluation team and is provided in Appendix III of this report.

The applicable FSC regional standard is the Final Appalachia (USA) Regional Forest Stewardship Standard (Version 4.2., dated December 6, 2005). These indicators are used to evaluate all forest management operations attempting to achieve FSC Forest Management certification in the Appalachia Region of the US. These Standards may be accessed at: www.fscus.org. Indicators that are associated with the FSC Appalachia Region standards are listed throughout the report in outline fashion without a prefix (e.g. 1.3.a, 6.3.a.4, etc.).

The FSC-U.S. Indicators for U.S. Department of Defense (DOD) and Department of Energy (DOE) forests (draft, dated February 25, 2003) used in the test evaluation are currently the only FSC certification standards approved for federal lands in the United States. The FSC-U.S. DOD/DOE Indicators are used in this test evaluation to supplement the FSC Regional Standards. **The DOD/DOE indicators are located beneath the corresponding FSC Criteria with the letters “DOD/DOE” and are highlighted in blue text (e.g. 6.3.b. DOD/DOE 1).** The DOD/DOE Indicators were developed in conjunction with the FSC-U.S. Policy on Federal Lands, which was adopted by the FSC U.S. Board of Directors on February 25th, 2003. In the U.S., federally-owned forestlands must first meet the threshold standards of the FSC-U.S. Federal Lands Policy before certification can proceed. At this time, U.S. National Forests have not met the FSC-U.S. Federal Lands Policy and standards specific to the USDA National Forest System have not yet been developed by the FSC. The DOD/DOE indicators are included in this test evaluation at the request of The Pinchot Institute for Conservation and the U.S. Forest Service.

Also, a total of 17 “Additional Considerations” have been developed by SmartWood from special concerns that were expressed by targeted stakeholders through a survey distributed in October 2005 and again in March 2006. Stakeholders were asked to provide input on the applicability and adequacy of the FSC standards to address any considerations that were unique to the National Forest System. These special concerns relate to the perceived limitations of the FSC standards (as presented above) for evaluating ANF forest management operations. Special Considerations developed by Scientific Certification Systems in a parallel process for the Lakeview Federal Land Stewardship Unit of the Winema-Fremont National Forests in Oregon were also included in SmartWood’s evaluation of ANF Special Concerns. SmartWood compiled all input received as described above and evaluated these special concerns to determine whether they should be used as “Additional Considerations” for the ANF. Draft “Additional Considerations” were then subjected to an internal review by SmartWood staff and the SW/PwC auditors. The resulting “Additional Considerations” were incorporated into the test evaluation of the ANF. SW/PwC evaluated ANF’s performance against these “Additional Considerations” in a manner identical to that for all other indicators included in the test evaluation with the exception that Corrective Action Requests (CARs) were not to be issued for “Additional Considerations.” **Additional Considerations are located beneath the corresponding Criterion in the FSC Standard in green text.** The Additional Considerations are numbered with a prefix of “AC” such that they identify the corresponding Criterion. (e.g., AC 1.1.2 is the second Additional Consideration associated with FSC Criterion 1.1).

2.2. Test Evaluation Team and Qualifications

Christopher A. Nowak, PhD (SmartWood Lead Auditor, Forester) – Forester/Silviculturist, Associate Professor. Education: PhD 1993, MS 1986, and BS 1985 in Forest Resources Management from SUNY College of Environmental Science and Forestry-Syracuse; AAS 1979 in Forest Technology from SUNY College of Environmental Science and Forestry-Wanakena. Experience: Associate Professor of Forestry at SUNY College of Environmental Science and Forestry (8½ years, current); 5½ years as a Research Forester at U.S. Forest Service's Forestry Sciences Laboratory, Irvine, PA; 6 years as a Research Scientist with Research Foundation of SUNY, Syracuse, NY. FSC auditing experience since 1997: peer reviewer, auditor, team member, or team leader for 31 FSC Forest Management assessments across the eastern hardwood region. SmartWood Forest Certification Assessment Team Leader Training Workshop 2001. SmartWood US Auditor Procedure Training, SW Audit Procedures 2005.

Stephen C. Grado, PhD, CF/CFA (Socio-economist) – SAF Certified Forester/Certified Forest Auditor and Fellow, Professor, Mississippi State University Department of Forestry . Education: PhD in Forest Resources 1992, MS in Forest Resources and Operations Research 1984, BS in Forest Science 1979, The Pennsylvania State University, State College, PA; BA Political Science, Villanova University, Philadelphia, PA. Experience: Dr. Grado has served as social assessor on 13 SmartWood pre-assessments and assessments, three U.S. Department of Agriculture Forest Service Test Evaluations, and as an auditor for innumerable chain-of-custody audits/assessments, and has also served as a peer reviewer of FSC certification reports. Served as a member of a forest project monitoring team auditing under SFI standards.

David S. deCalesta, PhD (Ecologist) – Certified Wildlife Biologist. Education: PhD 1973, MS 1971 in Wildlife Ecology from Colorado State University, AB Psychology from Dartmouth College 1964, U.S. Army Officer Candidate School 1966. Experience: 13 years as research wildlife biologist, USDA Forest Service Northeastern Research Station, 16 years assistant/associate professor of Wildlife Ecology and Forest Science, North Carolina State University and Oregon State University, and 6 years as a wildlife consultant and FSC auditor. Served on 15 assessment teams, was team leader on three. Performed eight audits and peer reviewed 2 FSC assessments. SmartWood Forest Certification Assessment Team Leader Training Workshop 2001. Currently Professor of Forestry (adjunct) at SUNY-ESF and consultant, Wildlife Analysis.

Donald R. Taylor, CF (PricewaterhouseCoopers Lead Auditor) – SAF Certified Forester, Senior consultant and lead auditor for PwC, based out of Greenville, South Carolina. M.S. in forestry and MBA. Thirty years of field experience; has led numerous SFI audits for PwC for clients such as American Tree Farm System, Georgia Pacific, Boise, Forest Investment Associates, John Hancock Timber Resource Group, Plum Creek Timber Company, Willamette Industries, Westvaco, and the Stimson Lumber Company. Certified ISO 14001 EMS lead auditor. Prior to this work he worked for two major forest products companies as an operations manager, forester and vice president.

2.3. Report peer reviewers

Steve W. Selin, PhD: Social Scientist. Education: PhD in Recreation and Park Management. Experience: Professor and Program Coordinator of Recreation, Parks and Tourism, West Virginia University Division of Forestry. Current areas of study include recreation and tourism partnerships; citizen participation in natural resource planning; multi-party collaboration; conflict management; and, sustainable tourism development.

Mark Ducey, PhD: Forester. Education: Ph.D. in Forestry, M.S. Forest Hydrology. Experience: Assistant Professor of Forest Biometrics and Management. Expertise is in quantitative silviculture and forest management, natural resources inventory, and biometrics.

Anonymous Social Scientist: Identity requested to be withheld.

2.4. Test Evaluation schedule

Date	General Location* (main sites)	Main activities
October 30- November 1, 2005	ANF Supervisor's Office	Pre-test evaluation
January-May 2006	E-mail, phone	Test evaluation planning; field site selection
January-June 2006	E-mail, phone	Development of Additional Considerations
May, throughout	Mailing/e-mail/web	Public briefing notice posted on the SmartWood website and distributed to several hundred local, regional and national stakeholders.
April 27, 2006	ANF Forest Supervisor's Office, Bradford Ranger District Office, Marienville Ranger District Office	Informational sessions by SW / PwC team, for ANF staff
June-August 2006	Mailing	Stakeholder mail survey
June 11, 2006	Warren, PA—hotel	Test evaluation team meeting
June 12, 2006 (early morning)	ANF Supervisor's Office	Introductory meeting, review of FSC Principles and Criteria, final planning for field visits
June 12, 2006 (late morning-evening)	ANF field sites	Site visits/field evaluations
June 13, 2006	ANF field sites	Site visits/field evaluations
June 14, 2006	ANF proper	Site visits/field evaluations
June 15, 2006	ANF field sites; ANF Supervisor's Office	Site visits/field evaluations / office visits
June 15, 2006	Warren Public Library	Public meeting/stakeholder consultation
June 16, 2006 (morning-early afternoon)	Warren, PA—hotel	Test evaluation team meeting
June 16, 2006 (late afternoon)	ANF Supervisor's Office	Debriefing
June-August 2006	E-mail, mail, phone	Stakeholder consultation
Total number of person-days used for the test evaluation: 54 days * Detail on sites visited provided in Appendix VI.		

2.5. Evaluation strategy

The test evaluation began with the pre-test evaluation, as detailed in a report entitled "Pre-Evaluation Report for: Allegheny National Forest," dated April 21, 2006.

On April 27, 2006, the lead assessors from SW and PwC (Nowak and Taylor) and the SmartWood U.S. Coordinator (Dave Bubser) conducted a series of informational sessions for ANF staff members. Sessions focused on describing the project and reviewing processes and procedures for the test evaluation. These sessions were not originally planned as part of the project, but were determined to be needed during the pre-test evaluation. Conduct of the sessions expedited the full Test Evaluation by: 1) developing a consistent base of understanding of the project among ANF staff (n=83 ANF staff attended the sessions); and 2) allowing the evaluation team to essentially, immediately begin field evaluations of ANF performance of forest management at the start of the full test evaluation week.

Between January and May, 2006, the SW/PwC team periodically worked with the ANF to select a subset of project areas to visit during the test evaluation. All project areas on the ANF over the last 10 years were listed by district (Bradford vs. Marienville). Each project area had an accounting of acres of activity by type of silvicultural intervention. It was decided that a full day would be spent on each district. Since project areas are generally large (1,000s of acres) with activity in many different stands, it was decided that only one or two project areas could be visited in each morning or afternoon. Two large, activity-diverse project areas were chosen in each district, one with recent management activity (last 5 years), and the other with past activity (6-10 years ago). Areas with activities from more than 10 years ago were not chosen so as to focus on performance of the current management system. Site sampling in a project area focused on evaluating environmental areas of risk (e.g., timber harvesting near water resources; skid trails, landings, forest roads, residual stand vegetation, active areas of timber harvest—from tree felling to skidding to processing at the landing) and diversity of operations. Upon arriving at a project area, the SW/PwC team would develop an on-site schedule to visit as many risk situations and different operations as possible. A fixed amount of time was allotted for the team to work across the area. Each team member was often accompanied by one or more ANF staff and one or more observers. Observers were present from the USDA Forest Service's national and regional offices, the Chequamegon-Nicolet National Forest, the USDA Northeastern Research Station, and the PIC.

In addition to two full days evaluating select project areas, two other days were spent working on forest areas that were representative of key environmental issues determined during the pre-test evaluation, namely oil and gas development, deer impact on forest health, oak regeneration, and areas with High Conservation Value Forest attributes such as old-growth. At the end of each set of field site visits, and at least once each morning and afternoon, the SW/PwC team would summarize the site visits and present preliminary findings to the ANF as related to perceived strengths and weaknesses in performance. The SW/PwC team worked in the field together for the first three days of the evaluation, but split up on the fourth day. A subset of team members continued to work in the field on project or special management areas, while others spent time at the Supervisor's Office working directly with staff to learn about worker relations and various other elements of the management system. A total of over 30 stands (operational areas with unique prescriptions) were evaluated during the nearly four days of field work.

Review of the Land and Resource Management Plan

The ANF is bound to pertinent federal legislation on planning and has demonstrated a full capacity to develop plans (see pre-test evaluation report entitled "Test Forest Management Evaluation, Pre-Evaluation Report for: Allegheny National Forest," dated April 21, 2006). The ANF has been operating under the 1986 Land and Resource Management Plan (LRMP), with amendments. In May 2006, a "Proposed Land and Resource Management Plan" (PLRMP) was released for public comment, along with the accompanying "Draft Environmental Impact Statement" (DEIS). A 90-day comment period on both the PLRMP and DEIS occurred from May through August 2006. The Final Environmental Impact Statement and revised LRMP, a public workshop on the final Environmental Impact Statement (EIS), and the record of decision are expected in 2007.

The 1986 LRMP was assessed in detail for the pre-test evaluation. It was determined during the pre-test evaluation that many elements of planning are detailed at a tactical level in individual projects (e.g., see Martin Run Project Draft Environmental Impact Statement, dated November 2004; size of this project area is over 8,000 hectares, or 20,000 acres). Planning was then judged for consideration to be a combination of both the strategic (1986 plan) and tactical (individual project area) documents. In association with the pre-test evaluation, the collective plan (strategic and tactical) was judged to be technically sound and extraordinarily detailed. Only a few minor gaps were observed in planning based on the dated plan. In the full test evaluation (reported herein), the 1986 LRMP was re-evaluated with higher intensity than during the pre-test evaluation. Also, since it is expected that forest management will be guided by a new Plan in 2007, the currently PLRMP (dated May 2006) was also evaluated, including the accompanying DEIS (dated May 2006). Some shortfalls in 1986 planning have already been addressed in the PLRMP, but until the proposed Plan is accepted (including which of four management alternatives—Alternative A essentially

being a direct extension of the 1986 LRMP), the ANF is to be held strictly accountable to the Plan currently in operation—the 1986 Plan.

List of management aspects reviewed by test evaluation team:

Type of site	Sites visited	Type of site	Sites visited
Shelterwood (seed/removal cuts)	11	Skid trails	9+
Thinning	5	Stand inclusions (ecological)	3
Salvage thinning	5	Boundary lines	2
Salvage two-age	2	Borrow pits	2
Two-age (1 st cut)	3	Hiking trails	3
Prescribed burn	2	Forest roads (old/new)	9+
Fence—deer enclosure	3	Oil and gas well heads/pads	4
Enrichment planting—pine	1	Riparian buffer zone	4
Site preparation—herbicides	2	Wildlife opening	2
Lop/scatter slash	2	Forest road/stream crossing	1
Landings	9	ATV trail (designated)	1

2.6. Stakeholder consultation process

Stakeholder consultation was used to supplement information relative to ANF's performance, It was also used as an effective means to identify difficult or controversial forest stewardship issues and gain an understanding of how stakeholders believe issues should be resolved. Stakeholder consultation occurred prior to, during, and after the on-site visit.

SmartWood distributed a public briefing paper to several hundred individuals and organizations prior to the test evaluation explaining the process and soliciting comment. This notice was also posted on the SmartWood Web site (www.smartwood.org). A public notice was also posted on the SmartWood Web site. The ANF distributed the public notice to their employees. Stakeholders receiving this notice included 238 individuals and organizations representing a broad spectrum of local, regional and national interests (government, tribal, environmental and conservation groups, industry, academia and other interested parties).

The survey questionnaire was not developed using scientific methodology. The objective of surveying stakeholders was to enhance the auditing process. Survey results were used as supplemental information, to identify potential issues that may not have otherwise been discovered, or to reinforce observations made by the auditors through other avenues of evidence gathering. The SmartWood auditors did not base any conclusions on conformance solely on results from the survey questionnaire, nor from stakeholder input gathered through other methods. Stakeholder consultation measures were effective in aiding the auditors to make credible judgments on conformance to the standards used in the test evaluation.

Relative to the test evaluation, ANF provided SmartWood with two digital stakeholder lists (names and addresses, names and e-mail addresses). The team supplemented both lists, which eventually contained 120 and 127 entries, respectively. In addition, the ANF developed an employee stakeholder list (n=155). SmartWood recognizes that stakeholder lists provided by entities undergoing evaluations are likely to be biased in some manner. Consequently, stakeholder lists provided by the operation being audited are considered a starting point, and are enhanced by SmartWood.

A stakeholder survey was developed and reviewed, pre-distribution, by the ANF, SW, and PwC. The survey, along with a cover letter and public notice, was distributed by mail and e-mail to stakeholders after

ANF's public engagement process, as part of their Forest Plan revision, was completed. Both stakeholder lists were surveyed in their entirety. The ANF requested that they distribute the public notice, cover letter, and survey to their own employees. For ANF employees, because the entire population was surveyed, the questionnaire functioned essentially as a census survey. For the remaining stakeholders, comprehensive stakeholder lists were provided by ANF and supplemented by SmartWood. The survey yielded a 15.7% return rate, at least in part because there was no second mailing or follow-up contacts made to encourage a response from the mail survey recipients. Even with a relatively low response rate, having received input from well over 100 stakeholders beyond those contacted during the test evaluation by telephone or in person significantly enhanced the auditing process.

During the test evaluation, the team also conducted meetings and individual interviews with ANF employees; contractors; peer organizations and businesses; local citizens and community representatives; conservation organizations; neighboring landowners; and other interested or relevant parties to ensure the test evaluation addressed stakeholder concerns and interests in the FMO's operations. Individual stakeholders were contacted, either in person, over the telephone, or by e-mail. In addition, several mail survey respondents (n=7) requested to be, and were, contacted by the team.

The consultation process was enhanced by a public stakeholder meeting which took place during the team's visit, on Thursday evening, June 15th, 2006, from 6:30-8:30 pm at the Public Library's Slater Room in Warren, Pennsylvania. A public notice of the meeting was distributed by the social assessor to stakeholders with a cover letter and survey. The meeting was also advertised in the local newspapers and on radio. Stakeholder surveys and a sign-in sheet were posted at the meeting entrance. The meeting, attended by 19 individuals, started with introductions and a presentation of the rationale for the project by the ANF and an overview of the evaluation process by SW and PwC. A question and answer and/or comment session ensued, moderated by the social assessor from the SmartWood team. Afterward, the ANF staff left the premises and another question and answer and/or comment session took place. Stakeholder input was summarized by the team and incorporated into the evaluation report.

Additionally, prior to the test evaluation, SmartWood developed an "Additional Concerns" survey designed to solicit input from targeted stakeholders regarding the applicability, and any perceived limitations unique to the USDA Forest Service and ANF operating environment, relative to the FSC standards being used. This survey was distributed in late October to approximately 75 individuals or organizations known or expected to have significant knowledge and interest in the ANF's management and/or national forests in general. Comments from this effort were incorporated into this report.

Stakeholder Type (NGO, government bodies, local inhabitant, contractor etc.)^a	Stakeholders informed (#)	Stakeholders consulted or providing input (#)^b
ANF Employees	155	35
Academics	9	14
Government bodies, individuals	77	30
NGOs	125	5
Students	21	2
Forest Industry ^c	22	19
Recreationists	2	36
Volunteers	2	2
Other ^d	6	45
	419	188

^aThe right column is not equal in number to the left column due to multiple entries in the survey and the addition of interviews to the right column totals.

^bThe survey was confidential. Respondents identified themselves by general, multiple listed categories as designated in the survey.

^cIncludes four loggers interviewed in the field.

^dIncludes USDA Forest Service and other observers, forest landowners, private citizens, and those not identifying themselves.

3. TEST EVALUATION FINDINGS AND OBSERVATIONS

3.1. Stakeholder comments received

Stakeholder consultation activities were organized to give participants the opportunity to provide comments according to general categories of interest based upon the test evaluation criteria. The table below summarizes issues identified by the test evaluation team with a brief discussion of each based upon specific interview and/or public meeting comments.

FSC Principle	Stakeholder comment	SmartWood response
P1: FSC Commitment and Legal Compliance	1. Most stakeholders felt the USDA Forest Service should pursue independent, third party evaluation of forest management practices using established standards.	1. In general, ANF employees and other unidentified stakeholder comments (78.9%) supported the evaluation process.
P2: Tenure & Use Rights & Responsibilities	1. Recreational opportunities on the ANF are diverse enough to appeal to a large number of visitors. Almost 83% of survey respondents were satisfied with this activity. 2. No evidence was found, either from ANF or through stakeholder engagement (i.e., stakeholder meeting, on-site interviews, mail or e-mail surveys), that disputes of substantial magnitude involving a significant number of interests exist or that there were any long-term issues related to tenure and use rights.	1. The ANF meets the FSC standards with respect to providing both customary recreational opportunities and facilitating customary forest uses (e.g., hunting, camping). 2. Claims of significant disputes with the ANF (e.g., Land Surveyor) related to tenure or use rights were found to be non-existent as expressed by the ANF and through stakeholder consultations.
P3 – Indigenous Peoples’ Rights	1. Stakeholders felt that ANF adequately address historical and cultural issues (i.e., related to site detection, protection, interpretation, public access) as 77.4% of respondents were satisfied with these management activities.	1. The team conducted interviews with archaeologists and visited historical and cultural sites and felt the ANF is meeting or exceeding the FSC standards with respect to tribal rights and protection of historical tribal sites and resources. Personal contacts also verified this assessment.
P4: Community Relations & Workers’ Rights	1. Lower grade level employees were not consulted prior to the federal move to a more centralized business plan for operations. Several current and former employees have expressed a dissatisfaction and demoralization with this process as well as with the introduction of “Enterprise Teams” where activities involved with these	1. Employee views were further substantiated by having 50% of survey respondents feeling that human resource issues related to employment need improvement. This is an issue that needs to be taken seriously by the ANF and USDA Forest Service. 2. The ANF spends a good deal of time interacting with the public. In terms of

	<p>groups were viewed as time consuming and inefficient. There also exists an apprehension revolving around future outsourcing for services. It was understood that moves toward a centralized business plan were going to be reevaluated after implementation but several employees saw an “after the fact” approach as counter productive.</p> <ol style="list-style-type: none"> 2. Community needs are being neglected due to preferences given to environmentalists and desires of tourists. 3. Public relations and communications were viewed favorably by stakeholders as 72.9% felt satisfied with this activity. 	<p>some of the disagreements, total resolution to the satisfaction of all parties is an unreasonable expectation. With the resources available to the ANF staff, the team feels they are doing an admirable job in terms of meeting FSC standards.</p> <ol style="list-style-type: none"> 3. As a public entity the ANF has a mandate to accommodate all individuals and groups who claim to have a stake in the well being of the forest.
<p>P5: Benefits from the Forest</p>	<ol style="list-style-type: none"> 1. The forest is not being managed for sustainability; in a large sense because the ANF is not harvesting enough wood. 2. Many stakeholders feel the forest is not receiving adequate funding for their myriad of activities and the added public pressure attached to everything they undertake. 	<ol style="list-style-type: none"> 1. Since the ANF is harvesting timber at levels far below ASQ, it was determined that they are in conformance with the performance standards (Criteria and Indicators) relating to harvest levels (rate of harvest) which require that harvest levels not exceed net growth. However, the issue of forest regulation (lack of age class balance) and the associated unpredictable flow of timber products was addressed via an Observation (OBS 3/06) associated with this Principle. 2. Field performance of forest management activities was generally observed to be high, indicating that current funding levels are adequate to sustain the forest. As the new forest management plan has an ambitious amount of added activities, especially in monitoring, the stakeholder concern may be more applicable to the near future. Currently, key concerns in terms of funding are associated with timber sale planning, preparation and administration and associated silvicultural activities to develop a regulated forest via balancing of age classes and timber harvesting to meet annual allowable cut, or ASQ. While

		<p>the ANF has a sound plan for achieving forest regulation, the current unbalanced state of the Forest, coupled with a recent history of problems in conducting timber harvest aimed at regeneration to create new age classes of forest, could lead to problems in achieving sustained, even-flow yield of timber products in the long-term. These concerns are addressed in OBS 3/06.</p>
<p>P6: Environmental Impact</p>	<ol style="list-style-type: none"> 1. Several comments were made about the negative impacts that oil and gas management is having on the ability of the ANF staff to manage the forest; however, some comment providers felt Oil and Gas Management (OGM) was being suppressed by special interest groups. 2. Several groups recommended providing more wilderness areas on the ANF. 3. White-tailed deer are still having an effect on forest regeneration and species composition. 	<ol style="list-style-type: none"> 1. Within the context of ANF's forest management, OGM was assessed in detail during the test evaluation, with some concern over its potential for environmental impact, particularly on water quality, but also on recreation and wildlife. At present, OGM is not having an overriding influence on forest management, and is currently considered to be in balance with other forest uses. However, this area of forest use may lead to future imbalance of forest and natural resource use caused by extensive and intensive oil and gas development. Continued development of wells, including roads to access these wells, could have an impact on social and ecological attributes of the ANF. Oil and gas are recognized forest resources on National Forests across the United States, and as such, they may need to be integrated into forest management considerations with other forest uses. SmartWood found no indication that OGM development is suppressed by special interest groups. 2. The ANF currently has 36,262 acres and 139 linear miles in lands either formally classified as Wilderness (Hickory Creek – 8,663 acres, Allegheny River Islands Wilderness – 368 acres) or in other lands that provide a wilderness experience (remote, large, devoid of timber management, difficult access with few access roads, old-growth or scenic values: Tionesta National Scenic Area – 2,018 acres; Tionesta Research Natural Area – 2,113 acres; Allegheny

		<p>National Wild and Scenic River – 87 miles; Clarion National Wild and Scenic River – 52 miles; Allegheny National Recreation Area – 23,100 acres). One group has called for 8 additional areas totaling over 54,000 acres to be designated as Wilderness. In their most recent Forest Plan revision (2007), ANF recommended two additional areas totaling approximately 13,000 acres for designation as Wilderness Study Areas. Formal designation of Wilderness requires an act of Congress. The USDA Forest Service, and thus the ANF staff, is limited to evaluation and recommendation. Ultimately, decisions regarding Wilderness are in the hands of the public and their elected representatives in Congress.</p> <p>3. An aggressive, comprehensive partnering of the ANF with the PGC and Kinzua Quality Deer Cooperative has resulted in increased harvest of antlerless deer and reduced impact on forest vegetation. However, because of the lag effect (vegetation response to reduced deer density and impact is 3-5 years, as documented in KQDC reports) abundance of regeneration is still low, even though intensity of impact is at the zero to light levels). Because of the continuing emphasis by the ANF on deer reduction and management, future deer impact should continue to be low, and vegetation response will be greater, once the lag effect is overcome. However, this program is ineffective in old-growth, wilderness, and other areas where hunters do not have through-access, will hunt only on the periphery of such areas and have relatively little impact on deer density or impact.</p>
P7: Management Plan	No comments received.	No response needed.
P8: Monitoring & Assessment	1. Not enough time is invested by ANF in monitoring results of (conservation) projects.	1. ANF biologists adequately monitor conservation projects, such as wildlife planting sites, as evidenced by a report "Wildlife Planting Sites, Bradford Ranger District" given as

		evidence. In this report, conservation sites are mapped, individual plantings (by species) located and condition of plantings noted and additional comments recorded for additional improvements.
P9: Maintenance of High Conservation Value Forest	1. There was a great deal of interest and a number of suggestions in regard to HCVF areas on the ANF. Over 67% of respondents felt that some ANF areas should be considered as HCVF sites.	1. While the ANF has protected many areas with HCV's, there may be other areas that could be protected via designation as HCVF. A new process for HCVF designation may need to be developed by ANF that would be based, in part, on stakeholder input (see CAR 9/06).
P10 - Plantations	No comments received.	No response needed.

3.2. Main strengths and weaknesses

Principle	Strengths	Weaknesses
P1: FSC Commitment and Legal Compliance	Laws and regulations are fully codified in USDA Forest Service Manuals (FSMs) and Forest Service Handbooks (FSHs), together known as the "Forest Service Directives Systems."	The ANF has not demonstrated a long-term commitment via writing to adhere to the FSC Principles and Criteria. (CAR 1/06).
P2: Tenure & Use Rights & Responsibilities	Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, lease agreements) were found to be clear and readily accessible. Boundary line supervision, under the auspices of the ANF's Land Surveyor, was clearly explained and procedures documented. During field audits there was considerable ground-truthing of forest boundaries and they were found to be exceptional.	No weaknesses were found for this Principle.
P3 – Indigenous Peoples' Rights	Archeological work done to identify, protect, and interpret sites and artifacts related to Indigenous Peoples is commendable. Partnerships with agencies, universities, and the Seneca Nation of Indians (SNI) are very proactive.	No weaknesses were found for this Principle.
P4: Community Relations & Workers' Rights	Communities and their citizenry residing within, or adjacent to, the ANF have unique opportunities for employment, training, and advancement.	Logging contractors do not consistently fulfill safe guards built into the Timber Sale Contracts. (CAR 2/06)

	<p>Services provided by the forest such as public education and outreach, recreational opportunities, economic benefits, and ecosystem-related outputs are exceptional.</p> <p>Measures taken to ensure the safety and the well-being of employees are exemplary as would be expected for a federal entity.</p>	
P5: Benefits from the Forest	<p>Balanced provision of forest products and non-commodity forest values is a purpose of the USDA Forest Service National Forest Systems. Relative to other managed forests, the ANF has developed a system of providing that balance in a model manner.</p>	<p>The ANF has not formally addressed the assessment, management, harvesting and monitoring of NTFPs. (CAR 3/06)</p>
P6: Environmental Impact	<p>Assessment of current conditions, ecological functions, and special habitats is comprehensive and aggressive.</p> <p>Comprehensive and exemplary safeguards, including conservation zones, are established for rare, threatened, or endangered (RT&E) species.</p> <p>The ANF has a comprehensive, aggressive, and proactive program regarding ATV and snowmobile use of trails that protects soil and water resources.</p> <p>Connectivity of conservation zones is ensured by a unique landscape corridor connecting such zones.</p> <p>Enhancement of standing and down coarse woody debris is comprehensive, pervasive, and aggressive.</p> <p>Comprehensive and forceful management of an overabundant deer herd has resulted in a recovery in diversity in the understory of many areas of the ANF.</p> <p>Inventory and management have resulted in enhancement, and preservation of a great diversity of habitats for native species.</p>	<p>Definition and management of inner and outer stream-side management zones (SMZs) do not correspond to definitions and management practices in the FSC Appalachia Region Standard. (CAR 4/06)</p> <p>ANF currently permits the use of at least one chemical (Imazapyr) currently designated as “highly hazardous” in the FSC Pesticide Policy: Guidance on Implementation (FSC GUI 30 001). (CAR 5/06)</p> <p>Contractors do not regularly participate in local recycling and reuse programs regarding materials used on the ANF. (CAR 6/06)</p>

	<p>Aggressive inventory and management have provided unusually comprehensive representativeness of ecologically viable areas, especially old-growth.</p> <p>Approximately 25% of the Allegheny National Forest is managed to allow natural disturbances to occur and progress to a natural state of species composition and structure.</p> <p>State BMPs are scrupulously adhered to.</p> <p>Construction and maintenance of haul roads is of highest quality.</p> <p>Access to temporary and permanent roads is tightly controlled, while remaining flexible to permit access sufficient to help hunters reduce deer density.</p> <p>Identification of Management Areas has relegated areas with primary emphasis on timber production to relatively flat areas, reducing potential for soil and water erosion.</p>	
P7: Management Plan	Depth and detail of analysis for plan develop is extraordinary for forest management, and the associated forest management plan is a model of completeness, particularly the connection between vision, goals, objectives, standards and guidelines, monitoring, and public input.	While training is important in the USDA Forest Service and the ANF, the ANF may be using logging contractors who are not trained or certified in the state Certified Logger. Program (CAR 7/06)
P8: Monitoring & Assessment	Monitoring for some, but not all of FSC monitoring requirements (see CAR 9/06 and CAR 10/06), is intense and frequent and well summarized to both inform ANF's publics and guide improvement in forest management.	<p>Some monitoring elements required by Appalachia Standards are not met. (CAR 8/06)</p> <p>Little monitoring or record keeping exist for non-timber forest products (NTFP). (CAR 3/06)</p>
P9: Maintenance of High Conservation Value Forest	Identification and mapping of attributes that qualify as HCVF is comprehensive.	<p>ANF managers do not have a written protocol for assessing presence of HCVF attributes on abutting forestlands and do not pursue coordination of conservation efforts with owners and managers of abutting forestlands for all HCFV attributes. (CAR 9/06)</p> <p>ANF managers do not have a protocol or policy for monitoring the effectiveness of</p>

		measures to protect, maintain, and enhance identified HCVF attributes. (CAR 10/06)
P10 - Plantations	Not applicable	Not applicable
Chain of custody		The ANF does not have a formal chain-of-custody (CAR 11/06).

3.3. Identified non-conformances and corrective actions

A non-conformance is a discrepancy or gap identified during the test evaluation between some aspect of the FMO's management system and one or more of the requirements of the forest stewardship standard. Depending on the severity of the non-conformance the test evaluation team differentiates between major and minor non conformances.

- **Major non-conformance** results where there is a fundamental failure to achieve the objective of the relevant FSC criterion. A number of minor non-conformance against one requirement may be considered to have a cumulative effect, and therefore be considered a major non-conformance.
- **Minor non-conformance** is a temporary, unusual or non-systematic non-conformance, for which the effects are limited.

Major non-conformances must be corrected **before** a favorable finding of overall conformance can be issued. Minor non-conformances do not prohibit issuing an overall finding of satisfactory conformance, however, they do represent shortcomings that must be addressed in order to achieve full conformance with the standard.

With the exception of the Additional Considerations, Each non-conformance is addressed by the test evaluation team by issuing a corrective action request (CAR). **Timelines for completion of CARs are not provided as the ANF will not be pursuing FSC certification as a part of this test evaluation.**

CAR #: 1/06	Reference Standard #: 1.6.a
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	The ANF has not provided written statements of commitment to the FSC Principles and Criteria.
Corrective Action Request: The ANF shall develop a written statement of commitment to the FSC Principles and Criteria. (Criteria 1.6.a).	
Deadline for completion of corrective action: Not applicable.	

CAR #: 2/06	Reference Standard #: 4.2.b
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	While the ANF itself operates consistently with laws and regulations regarding the safety of forest operations, timber harvest operators were observed to be in non-compliance in the Forest.
Corrective Action Request: The ANF shall require contractors to meet or exceed federal and state standards for health and safety, including those strictures outlined in the Timber Sale Contracts for logging contractors.	
Deadline for completion of corrective action: Not applicable.	

CAR #: 3/06	Reference Standard #: 5.2.d, 7.1.b.1, 8.2.a.2, 8.2.b.2
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	The ANF has not formally addressed the assessment, management, harvesting and monitoring of NTFPs.
Corrective Action Request: ANF shall develop and implement a plan to manage and monitor abundance, regeneration, and habitat conditions of NTFPs including the maintenance of records for the yield of harvested NTFPs.	
Deadline for completion of corrective action: Not applicable.	

CAR #: 4/06	Reference Standard #: 6.5.p, 6.5.r, 6.5.s, 6.5.t, 6.5.u
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	While the ANF has developed guidelines for protecting riparian zones during forest management operations, some strictures do not exactly match the Appalachia standard.
Corrective Action Request: In both written policy and practice, the ANF shall amend its management strategies within and near riparian areas as follows: <ul style="list-style-type: none"> ▪ buffer zones for perennial and intermittent streams shall match those found in Table 6.5.t of the Final Appalachia (USA) Regional Forest Stewardship Standard Version 4.2 ▪ management activities conducted in proximity to riparian zones shall observe streamside management zones (SMZs) in conformance with Table 6.5.t.; ▪ clarify whether harvests are allowed in the inner SMZs of non-high-quality and high-quality water courses and assure that such clarification conforms with 6.5.r.; and ▪ stipulate that harvests within the outer SMZ are limited to single-tree and group selection while maintaining at least 50% of the overstory. 	
Deadline for completion of corrective action: Not applicable.	
CAR #: 5/06	Reference Standard #: 6.6.h
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	ANF currently permits the use of at least one chemical (Imazapyr) currently designated as "highly hazardous" in the FSC Pesticide Policy: Guidance on Implementation (FSC GUI 30 001).
Corrective Action Request: ANF must develop and implement safeguards to ensure chemicals prohibited by the FSC Chemical Use Policy and amendments either are not applied, or are temporarily permitted through a formal derogation issued by the FSC for the use of specific prohibited chemicals.	
Deadline for completion of corrective action: Not applicable.	
CAR #: 6/06	Reference Standard #: 6.7.d
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Maintenance personnel for the ANF recycle materials where possible and dispose materials in a manner that avoids contamination, but no such requirement is placed upon contractors.
Corrective Action Request: The ANF must require that contractors participate in local recycling and reuse programs that dispose of materials to avoid contamination.	
Deadline for completion of corrective action: Not applicable.	
CAR #: 7/06	Reference Standard #: 7.3.a
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	While forest workers are determined to be knowledgeable and skilled and well supervised, leading to proper implementation of the management plan, it regularly occurs that logging and silvicultural contractors are not certified or trained by certified local, state, or national programs.
Corrective Action Request: The ANF shall develop and implement a policy to require logging contractors to be certified or trained by local, state, or national programs.	
Deadline for completion of corrective action: Not applicable.	
CAR #: 8/06	Reference Standard #: 8.1.a, 8.1.b, 8.2.d.3
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Monitoring has been developed over time with progressively more intense and frequent monitoring endeavors. Past efforts in monitoring as guided by the 1986 Plan were lacking, but proposed, new efforts in the current PLRMP are generally well set to allow the ANF to be consistent with FSC standards.
Corrective Action Request: The ANF must enlarge the scope of its monitoring plan to include monitoring proposed in the 2006 PLRMP, and additionally it must evaluate: <ul style="list-style-type: none"> ▪ the degree to which the management plan vision has been achieved ▪ deviations from the management plan ▪ unexpected effects of management activities or disturbances ▪ social effects of management activities, including creation and maintenance of local jobs as well as 	

<p>other impacts to local communities attributable to ANF forest management decisions. Further, all monitoring, including intensity and rationale for such monitoring, must be described in the monitoring plan.</p> <p>Deadline for completion of corrective action: Not applicable.</p>

CAR #: 9/06	Reference Standard #: 9.3.c
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	ANF managers do not identify HCVF attributes that may occur on abutting forestlands, nor do they attempt to coordinate conservation efforts with owners and managers of HCVFs that may occur on abutting forestlands
Corrective Action Request: The ANF shall develop and implement a written protocol for assessing presence of HCVF attributes on abutting forestlands. Additionally, ANF managers shall pursue and document coordination of conservation efforts with owners and managers of HCVFs on abutting forestlands, if any are discovered during the assessment process.	
Deadline for completion of corrective action: Not applicable.	

CAR #: 10/06	Reference Standard #: 9.4
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	There is no annual monitoring to assess effectiveness of measures employed to maintain and enhance applicable conservation attributes in High Conservation Value Forests (HCVFs).
Corrective Action Request: ANF shall develop and implement a protocol and policy for monitoring the effectiveness of measures to protect, maintain, and enhance identified HCVFs.	
Deadline for completion of corrective action: Not applicable.	

CAR #: 11/06	Reference Standard #: CoC 5, CoC 9
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	The ANF does not have a formal CoC. While key elements associated with control of forest products to and at the forest gate and associated accounting of products sales are well developed, the ANF would need to develop new CoC procedures.
Corrective Action Request: ANF shall develop, document and apply procedures for chain-of-custody. This system should include: <ul style="list-style-type: none"> • a system to include FMO FSC certificate code and certified description of products on sales and shipping documentation (CoC 5) • a system to ensure that all use of the FSC/SW trademarks, as well as related public information, are submitted to SmartWood for review and approval (CoC 9) 	
Deadline for completion of corrective action: Not applicable.	

3.4. Follow-up actions required to meet the standard used in the test evaluation

Certification is not a potential outcome of this test evaluation. No major non-conformances were identified, so no actions were needed, nor taken, by the candidate operation to address these areas during or after the test evaluation process.

3.5. Observations

Observations are non-binding measures identified by the test evaluation team that address a very minor inconsistency or the early stages of a performance gap which does not of itself constitute a non-conformance, but which may lead to a future non-conformance if not addressed.

Observation	Standard Reference
OBS 1/06: ANF could make compliances with international agreements, as ratified by the U.S. Senate (e.g., CITES, Convention of Biological Diversity), more explicit in forest management planning and operation.	1.3.a

OBS 2/06: The USDA Forest Service and the ANF could look to their employees for inputs and comments on the ongoing centralization of services and the drive toward more efficient operations before implementing such actions.	4.1.a
OBS 3/06: Since a large set of forest values and services, including important contributions to economies of local communities, can be significantly influenced by timber harvest, the ANF could continue to strive to meet ASQ and better regulate the forest in terms of the balance of age classes.	5.4.a
OBS 4/06: ANF could implement one of the landscape corridor proposals in the 2006 PLRMP as a landscape-level conservation and restoration analysis, particularly in association with late-successional forest ecosystems.	6.2. DOD/DOE 2
OBS 5/06: Oversight in how late-successional forest areas (Management Area 6.1) are managed, conserved, and monitored could be strengthened to ensure that these areas are managed according to prescription, perhaps by utilizing technology transfer and monitoring programs that promote their application.	6.4.a
OBS 6/06: The ANF should continue to work on developing a working list of owners of subsurface rights, particularly as related to oil and gas development.	7.1.b.3
OBS 7/06: A description and justification of harvesting techniques and equipment should be developed as a broadly applicable planning document.	7.1.i
OBS 8/06: With Plan revision nearly at an end, the ANF should reconstitute the annual monitoring reports that it shares with the public on the results of monitoring the implementation of the ANF's PLRMP.	8.5.a
OBS 9/06: To facilitate information-sharing and conformance to FSC standards, the ANF staff should develop a comprehensive process for identifying, categorizing, and defining protection for HCVF attributes identified on the ANF in an inclusive appendix to the PLRMP which should include maps and loci of HCVFs.	9.1.a
OBS 10/06: Lack of a formal process for identifying, categorizing, and defining protection for HCVF attributes (see Observation 6/06) hinders development and implementation of protection policies and protocols for HCVF attributes, should they be needed. ANF managers should review identified HCVF attributes and determine whether protection policies other than preventing construction of forest roads in some areas with HCVF attributes is needed, and if so, protective policies should be enumerated and included in the PLRMP, including the public summary.	9.3.d

3.6. Summary Conclusion

Based on a thorough field review, analysis, and compilation of findings by this SmartWood test evaluation team, the ANF has demonstrated that their described system of management is being implemented consistently over the entire forest area covered by the scope of the test evaluation. As no Major Non-Conformances were identified, SmartWood concludes that the ANF's management system, if implemented as described, is in overall conformance with the FSC Appalachian Region standards, DOD/DOE Indicators and Additional Considerations used for this test evaluation. Areas of weakness that would need to be addressed are both systemic (inherent only to the FSC system) and programmatic. The systemic weaknesses relate to: formal commitment to FSC; chain of custody; use of trained or certified loggers; riparian zone widths; assessment, management, and monitoring of NTFPs; identification and monitoring of HCVFs; and recycling. Programmatic weaknesses include chemical use; some shortfalls in monitoring and logger safety, with the latter associated with a concern that may evolve into a major weakness.

4. RELEVANT BACKGROUND INFORMATION

4.1. Ownership and land tenure description

In 1911, the United States Congress passed the Weeks Act which permitted the federal government to acquire lands in the eastern U.S. for the establishment of National Forests. In 1923, the ANF was established within the USDA Forest Service. All lands incorporated into the forest were originally privately held. Current acreage is 513,325, which is 95% forested with a second-growth, maturing hardwood forest. The ANF is mandated by law to provide a multitude of ecosystem services to society. These include watershed protection, plant and animal habitats, cultural history, recreation, wood products, and research and demonstration. The local communities depend, in part, on the forestry-based activity associated with the ANF (e.g., on average, approximately 2,000 acres harvested per year since 1987). The provision of these forest ecosystem services also allow for a large number of customary use rights on the land base. These include hunting and angling, hiking, cross-country skiing, ATV and snowmobile use, as well as a number of non-consumptive activities such as wildlife watching, wilderness exploration, picnicking, swimming, and camping. The 2005 National Visitor Use Monitoring (NVUM) study on the ANF indicated that there were over 1.2 million visitor days directed toward these activities. Approximately 93% of the subsurface mineral rights are owned by private enterprise. In general, the ANF works with about 30 companies, who lease mineral rights from primary owners, to ensure natural ecosystem sustainability. However, there are individuals who own and operate oil and gas wells. There are over 7,000 well sites, along with roads, pipelines, and electric lines occupying 50,000 acres.

4.2. Legislative and government regulatory context

As a unit of the USDA Forest Service, the ANF is required to abide by an extensive array of legislative and regulatory mandates covering all activities and operations ranging from planning processes, infrastructure development, forest management, employee relations, and law enforcement. Laws related to planning that are particularly important include the Multiple-Use Sustained Yield Act of 1960 and National Forest Management Act (NFMA) of 1976. The planning process was further enhanced with the passage of the National Environmental Policy Act (NEPA) of 1969. This Act brought environmental analysis and public participation into planning of federal activities. The NEPA process makes information available to the public both before decisions are made and prior to taking action. To illustrate this, in recreation management a NEPA report must be written whenever there is an earth disturbance related to recreation development (e.g., ATV trail development) or in relation to a social issue (e.g., vista clearing on a hiking trail). To be in compliance with NEPA and other relevant regulations EISs have to be written. In the Forest Plan, EISs document the effects of implementing various forest management options.

Other major pieces of legislation include the NFMA regulations (1982 version), Endangered Species Act of 1973 as amended in 1978, National Historic Preservation Act of 1966 as amended through 1992, Archaeological Resource Protection Act (ARPA) of 1979, and Clean Water Act of 1972 as amended through 2002. New NFMA regulations established analytical and procedural requirements for developing, revising, and amending Forest Plans. Each forest management objective in the Plan deals with legislation that is more specific to the discipline. For example, in recreation management the Land and Water Conservation Fund Act of 1965, as amended through 1996 and the National Trails System Act of 1968, are particularly relevant. The Knutson-Vandenberg Act of 1930 (16 U.S.C. 576b) as amended, authorizes the use of timber sales receipts to reforest harvested areas and protect future productivity. USDA regulations also guide issues related to employee responsibilities and conduct [(7 CFR 0.735-11(b) (14)] and safety issues [Occupational Safety and Health Administration (OSHA)].

The USDA Forest Service Directives System is the primary basis for management and control of all internal ANF programs and serves as the primary source of administrative direction for employees. It sets forth legal authorities, management objectives, policies, responsibilities, delegations, standards, procedures, and other instructions. The FSM contains legal authorities, goals, objectives, policies,

responsibilities, instructions, and necessary guidance when planning and executing assigned programs and activities. The FSHs are directives providing instructions and guidance on how to proceed with a specialized phase of a program or activity.

In many cases Pennsylvania state law also applies to ANF forest activities. For instance, all ATV operators must purchase and carry a vehicle registration certificate and have liability insurance. These requirements are required by the Pennsylvania Department of Conservation and Natural Resources. Hunting and fishing licenses are required on the ANF and must be purchased from the Pennsylvania Game Commission.

4.3. Environmental Context

The ANF is within the unglaciated portion of the Allegheny Plateau. Soils are thin and old and relatively acidic and unfertile. Prior to European settlement, the forest was dominated by eastern hemlock, sugar maple, and American beech. Repeated waves of logging, beginning in the 1800s, resulted in a change of species dominance, with relatively shade-intolerant species such as black cherry, black and yellow birch, and red maple becoming common in a predominantly even-aged forest. The ANF lies within a largely forested landscape of maturing second growth northern hardwood/Allegheny hardwood forest type. The ANF contains the largest block of true old growth east of the Mississippi, from the Great Smoky Mountains in Georgia to the Adirondacks in New York (~4,000 acre Tionesta Scenic and Research Natural Areas). The Allegheny Reservoir and Allegheny River run along and through the western border of the ANF; the Clarion River runs along its southern boundary, and numerous other creeks run through it. The ANF contains two Pennsylvania Game Commission Game Lands (208 and 209), a state park (Chapman), two wilderness areas (Hickory Creek and Allegheny Islands), two National Recreation Areas (northern and southern portions of the Allegheny River/Reservoir) and abuts or includes two wild and scenic rivers (Allegheny and Clarion). Because of the size, complexity, and connectivity of the forest within and adjacent to the ANF, the area provides a wide diversity of forested, wetland, and riparian habitats for a similarly wide diversity of plant and animal communities. There are 26 federally-sensitive species (1 reptile, 1 bird, 2 mammals, 10 invertebrates, 5 plants and 7 fish); two threatened (bald eagle, small whorled pogonia) and three endangered (Indiana bat, northern riffleshell and club shell mussels) species within the ANF. Additionally, there are one reptile, one bird, two mammal, 10 invertebrate, five plant, and seven fish species on the Regional Forester's Sensitive Species List.

Within the last 20 years, the northwestern region of Pennsylvania has experienced a major decline in sugar maple (due to a combination of persistent drought, multiple defoliations by the elm spanworm, forest tent caterpillar, and other lepidopteron pests, and relative soil infertility related to nutrients essential to sugar maple health), and scattered mortality of American beech (due to the scale insect/nectria fungus combination that kills overstory trees). Coupled with these mortality factors there has been recent large and small-scale blowdown of trees. These three factors produced a situation where recent forest management operations have emphasized salvaging dead, dying, and/or wind-thrown trees. However, the anticipated bonanza of advance regeneration of seedlings stimulated by opening of the overstory canopy has been thwarted by browsing by the overabundant white-tailed deer herd. The regional white-tailed deer herd has exerted enormous influence since 1920 over biodiversity by greatly truncating plant species diversity and vertical structure (virtual elimination of shrub and herbaceous layers with concomitant reduction in species richness and abundance and near elimination of advance regeneration of tree species preferred as forage), songbird species richness and abundance, and deer herd health.

Regional studies have shown that as the Pennsylvania deer herd expanded during the 1920-1990 period, understory plant species dynamics changed dramatically, with virtual elimination of some woody species and proliferation and virtual domination of the understory by other plants such as New York and hay-scented ferns, native grasses, American beech, and striped maple (plants resistant to deer browsing). Virtually all forest understories within the region are comprised of ferns, grasses, and/or striped maple and beech that interfere with regeneration of desirable woody species by out-competing them for resources. Fencing to prevent deer browsing and herbicide application to reduce interference by herbaceous and woody species place economic burdens on landowners attempting to successfully regenerate stands after

harvests. However, recent changes in harvest regulations (i.e., concurrent buck and doe seasons, additional opportunities to harvest antlerless deer with Deer Management Assistance Program (DMAP) licenses), plus an aggressive program for educating and motivating hunters to harvest antlerless deer (Kinzua Quality Deer Cooperative) in the northeastern portion of the ANF have resulted in a significant reduction in deer density and a resurgence of tree, shrub, and herbaceous regeneration.

4.4. Socioeconomic Context

The ANF is located on the Allegheny Plateau in northwest Pennsylvania within the counties of Elk, Forest, McKean, and Warren. While many small towns are located in proximity to the ANF, the setting is primarily rural. The ANF is in close proximity to a large portion of the eastern U.S. population. The ANF fulfills many social, ecological, and environmental functions and is important to the fabric of the surrounding communities and the state of Pennsylvania. Visitors from other states and countries also take advantage of all the ANF has to offer. Ecosystem services provided such as watershed protection, plant and animal habitats, cultural history, recreation, wood products, and research and demonstration provide a rich milieu for those who benefit from the forest.

The ANF staff manages the forest under legislative mandates while constrained by a public that has different and often conflicting demands on the forest. These publics include the forest products industry, environmentalists, recreationists, and the oil and gas industry, to name a few. The ANF also has an ongoing dialogue with the SNI and solicits their input for forest planning and management. The intensity of the public debate arising from these often conflicting demands on the ANF and most other national forests can rise to a level of acrimony not typically seen on other forest ownerships. Filing of lawsuits is not an uncommon strategy used by individuals or groups determined to impress their interpretation of the legislative mandates guiding national forests, most commonly as a means of challenging proposed timber harvesting operations.

The ANF is mandated by law to provide a multitude of ecosystem services to society, which includes watershed protection, plant and animal habitats, cultural history, recreation, wood products, and research and demonstration. The percent of National Forest land in a county is also important both socially and economically. Historically, millions of board feet of timber have been harvested annually, providing jobs for loggers and those involved in making wood products and furniture. For many rural communities, forest industries are important to the economy and cultural heritage. Revenues from timber sales and other revenue-generating activities are important to the four counties with ANF land within their boundaries, each of which is entitled to payments based on annual national forest receipts. Twenty-five Percent Fund of 1908, Payments in Lieu of Taxes (PILT), or Secure Rural Schools and Community Self-Determination Act of 2000 (SRSCS) payments to each county are directly related to the amount of National Forest land contained within the county. The Secure Rural Schools and Community Self-Determination Act of 2000 gave the counties the ability to continue receiving annual payments from national forests is an amount equal to the average of the three highest Twenty-Five Percent Act payments from 1986 to 1999. The ANF received its largest average wood harvest receipts in the years 1996-1998. Payment to each of the four counties during fiscal year 2005 were estimated to range between \$1.4 million and \$1.8 million. However, since 1996 timber harvests have been drastically reduced. While government subsidies have, in part, supplanted timber-based tax revenues for counties and school districts, these subsidies are due to terminate in 2007, thus making for an uncertain economic future.

In general, the ANF works with about 30 companies that lease mineral rights from primary owners, so as to ensure natural ecosystem sustainability. Individuals also operate oil and gas wells. There are over 7,000 well sites, along with roads, pipelines, and electric lines occupying 50,000 acres. Activities on these sources of disturbance and fragmentation bring into question the ability of the ANF to manage certain areas of the forest in a sustainable fashion. Timber and mineral extraction, and associated activities, are primary cause of concern for environmentalists and recreationists most who view the ANF as a reserve for flora and fauna, and a key component in preserving regional water quality.

Another key issue for recreationists is the quantity and quality of the deer herd. Deer hunting is a traditional activity in the region. The ANF is trying to balance controlling deer density to protect the forest and provide for its regeneration with hunter demands for an abundant deer herd.

Total annual estimated log production:	2,588 m3 (five year average 2001 – 2006)
Total annual estimated production of NTFP: (list all NTFP by product type)	Unknown
Club moss	Lycopodium spp.
Leeks	Allium spp.

Forest Use	
Land Use	Area (ha)
Production Forest	179,180
Natural forest	179,180
Plantation	0
Conservation/Protected Areas	3,036
Special Management Areas	13,357
Water	3,359
Non-Forest areas	9,107
Total Area:	208,038

FOREST AREA CLASSIFICATION

Total area evaluated	208,038 ha
Total forest area evaluated	208,038 ha
Forest area that is:	
Privately managed	0 ha
State managed	0 ha
Community managed	0 ha
Area of production forests (areas where timber may be harvested)	179,180 ha
Area without any harvesting or management activities (strict reserves)	16,393 ha
Area without timber harvesting and managed only for production of non-timber forest products or services	0 ha
Area classified as plantations ¹	0 ha

Area or share of the total production forest area regenerated naturally	100% ha
Area or share of the total production forest area regenerated by planting or seeding	0 ha
Area or share of the total production forest are regenerated by other or mixed methods (describe)	0 ha

Conservation values present in the forest (High Conservation Value Forests or HCVF) and respective areas		
HCVF Attributes	Description: Location on FMU	Area (ha)
A forest contains globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism,	Tionesta Scenic and Research Natural Area & Hearts Content	1721 ha. (4253 ac.)

¹ According to FSC definition “plantations” in this context should be understood as forest areas lacking most of the principal characteristics and key elements of native ecosystems as defined by FSC-approved national and regional standards of forest stewardship, which result from the human activities of either planting, sowing or intensive silvicultural treatments.

endangered species, refugia)	Scenic Area	
A forest contains globally, regionally or nationally significant: 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		
They are in, or contain rare, threatened or endangered ecosystems		
They provide basic services of nature in critical or unique situations (e.g. watershed protection, erosion control);	Hickory Creek Wilderness Allegheny National Recreation Area	12,854 ha. (31,763 ac.)
They are 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).	Allegheny National Wild and Scenic River & Clarion National Wild and Scenic River	224 km (139 miles)

APPENDIX II: Public summary of the management plan

<p>Main objectives of the forest management are: The ANF forest plan sets management objectives for each planning cycle. Objectives vary by management area and are described on the first page of each management area description. For example Management Area (MA) 3 produces the vast majority of timber harvested and has a primary objective to provide a sustained yield of high quality Allegheny hardwood and oak sawtimber through even-aged management. Secondary objectives on MA 3 are to provide a variety of age or size class habitat, to emphasize deer and turkey in all forest types, and squirrel in the oak type and to provide a roaded natural setting for developed and dispersed recreation. For further detail on the SNF Management Areas and corresponding management objectives, refer to the AND forest plan.</p>	
<p>Forest composition: The ANF current forest type distribution is as follows: 33% upland hardwood; 28% Allegheny hardwood; 17% oak; 16% northern hardwood; 16% northern hardwood; 2% hemlock; 2% conifer (spruce, red pine, white pine); 2% other; <1% aspen.</p>	
<p>Description of Silvicultural system(s) used: Primary silvicultural systems used are even-aged management, with most acres treated using shelterwood methods. Some two- age management occurs, as well as minor amounts of clearcutting. Some uneven-aged management occurs, primarily group selection</p>	
<p>Silvicultural system</p>	<p>% of forest under this management</p>
Even aged management	91 %
Clearcutting (clearcut size range <40 ac)	1 %
Shelterwood (<40 ac)	90 %
Uneven aged management	6 %
Individual tree selection	0 %
Group selection (group harvested of less than 1 ha in size)	6 %
Other types of management (explain)Passive	<1 %
<p>Harvest methods and equipment used: Rubber tired skidders, feller bunchers, tractors.</p>	
<p>Estimate of maximum sustainable yield for main commercial species: 481,950 cubic meters (94.5 MMBF) annually as per the 1986 Forest Plan estimate.</p>	
<p>Explanation of the assumptions (e.g. silvicultural) upon which estimates are based and reference to the source of data (e.g. inventory data, permanent sample plots, yield tables) upon which estimates are based upon: The Forest Plan data set was used for projections made in the Forest Plan. Individual projects rely on updated inventory data taken within project areas. Data analysis, for development of silvicultural prescriptions, is done using SILVAH program developed by NE Forest Experiment Station.</p>	
<p>Forest management organizational structure and management responsibilities from senior management to operational level (how is management organized, who controls and takes decisions etc.) The Forest Supervisor or District Ranger make decisions on projects that implement the forest plan. Interdisciplinary teams develop project proposals and conduct environmental analysis. Program area personnel implement projects that meet long term objectives of the Forest Plan. Program area specialists conduct monitoring to determine if implementation occurred as planned and if results are within acceptable limits</p>	
<p>Structure of forest management units (division of forest area into manageable units etc.): The ANF is divided into Management Areas that have varying long term goals and objectives, with different long term desired future conditions to be achieved in each. See 1986 Forest Plan - http://www.fs.fed.us/r9/forests/alleggheny/projects/forest_plan/</p>	
<p>Monitoring procedures (including yield of all forest products harvested, growth rates, regeneration, and forest condition, composition/changes in flora and fauna, environmental and social impacts of forest management, costs, productivity and efficiency of forest management): The Forest Plan contains monitoring requirement – see 1986 Forest Plan, Appendix B - http://www.fs.fed.us/r9/forests/alleggheny/projects/forest_plan/</p>	

Environmental protection measures, e.g. buffer zones for streams, riparian areas, etc., protection measures for Rare Threatened and Endangered Species and habitat: The Forest Plan contains forest-wide and management area specific standards and guidelines to be applied as part of management actions. These measures are designed to protect environmental concerns. See the following website for more details - http://www.fs.fed.us/r9/forests/alleggheny/projects/forest_plan/

APPENDIX III: Test evaluation standard conformance checklist (confidential)

Based on the team’s evaluation, a determination of conformance is assigned to each indicator. Conformance with indicators is determined by the entire test evaluation team through a consensus process. Where non-conformance with the standard is documented by the team, corrective action requests (CAR) are outlined. The following definitions apply, and are the basis for this test evaluation:

Precondition	Requirements that FMO must meet <u>before</u> certification by SmartWood could take place.
Minor CAR	Requirements that FMO must meet, within a defined time period (usually within one year), during a period of certification,
Observation	Non-binding measures identified by the test evaluation team that address a very minor inconsistency or the early stages of a performance gap which does not of itself constitute a non-conformance, but which may lead to a future non-conformance if not addressed.

The evaluation team’s determination of conformance and relevant findings are presented for each indicator presented below. Where applicable, CARs or observations are referenced under the indicator and detailed in the note section of the applicable criterion.

PRINCIPLE 1. <u>COMPLIANCE WITH LAWS AND FSC PRINCIPLES</u> - 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.	
<u>Criteria and Indicators</u>	<u>Findings</u>
Forest management shall respect all national and local laws and administrative requirements	
Criterion Level Remarks: Conformance. ANF management activities are fully conducted in manner consistent with national and local laws and administrative requirements, as explicitly codified in the FSMs and FSHs.	
1.1.a. Forest (see Glossary) management plans and operations comply with federal, state, county, municipal, and tribal laws, case law, and regulations.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF recently (May 2006) finished preparing a DEIS for the draft management plan revision in compliance with NEPA and other relevant laws and regulations. This DEIS documents the effects of implementing various ANF management options. The DEIS is the basis for determining what changes will be made to the PLRMP (p. vii, DEIS). The PLRMP was co-developed with the DEIS in compliance with the NFMA and other relevant laws and regulations, such as the Endangered Species Acts, Clean Water Act, National Historic Preservation Act, and the Archaeological Resources Protection Act (p. xii, DEIS).</p> <p>Laws and regulations are fully codified in USDA FSMs and FSHs, together known as the “Forest Service Directives Systems.” Nearly all management activities and control of internal programs on National Forest system lands are controlled by these USDA Forest Service Directives. The FSM contains legal authorities, goals, objectives, policies, responsibilities, instructions, and the necessary guidance to plan and execute assigned programs and activities (undated, unpublished ANF document entitled “Appendix D – Relevant Statutes, Regulations, Policies and Agreements”). Examples from the FSM include: laws, regulations and orders related to timber management, watershed and air</p>

	<p>management, and forest pest management. FSHs are directives that provide instructions and guidance on how to proceed with a specialized phrase of a program or activity. Handbooks are either a part of the manual or they incorporate external directives (undated, unpublished ANF document entitled “Appendix D – Relevant Statutes, Regulations, Policies and Agreements”), for example, the “Soil and Water Conservation Handbook.”</p> <p>It is the mandate and intent of the ANF to comply with laws at all governmental levels. Operations on the ANF were observed to be in full compliance with law and regulations.</p>
<p>1.1.b. Forestry operations meet or exceed both state forest practice regulations and Best Management Practices for forestry, whether voluntary or regulatory, and other protective measures for water quality that exist within the state(s) or other appropriate jurisdiction(s) in which the operations occur.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Forestry operations were observed to meet or exceed state and federal forest practice regulations and Best Management Practices (BMPs) for forestry (see findings associated with Criterion 6.5, exception for a minor CAR associated with inner SMZ management distances).</p> <p>Some stakeholders expressed concern with stream crossings and federal oversight of this state-controlled activity (stream crossings require a state permit). Of specific concern to stakeholders was that the ANF was not meeting all state requirements. Stream crossings were not extensively evaluated during the field evaluations, as very few were associated with the visited project areas. A discussion on this with the ANF indicated that stream crossings were rare, as most timber harvests occurred on top of the Allegheny Plateau where streams are few and easily avoided in terms of harvest operations. Additionally, a long discussion was held with the ANF on the issue of state permits for stream crossings and road building, with considerable discussion on the need on the part of the USDA Forest Service for obtaining such permits. The ANF (D. Salm, pers. comm.) indicated there is an exemption that applies to silvicultural related activity. The ANF is also pursuing a formal agreement with the state for certain kinds of permits.</p>
<p>1.1.c. Forest owners or managers share public information, provide open records, and conduct public participation as required by law.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF, as a federal entity, shares public information and follows regulations relating to the public input process (see findings associated with Criteria 4.4 and 7.4).</p>
<p>1.1. DOD/DOE 1. Disputes and legal challenges over land management and agency actions, including administrative and judicial appeals filed by stakeholders outside the agency, are identified. Information on the processes for resolving disputes is readily available to interested stakeholders.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF has had lawsuits and appeals over the last 10 years that are identifiable and an accessible part of the public record. Information on the processes for resolving such disputes is readily available via the Code of Forest Regulations (36 CFR 215).</p>

<p>AC 1.1.1. By policy and action, managers of National Forests shall demonstrate compliance with applicable federal laws and administrative requirements (e.g. NEPA, ESA, Clean Water Act, NFMA, MUSYA, The Wilderness Act, Wild and Scenic Rivers Act, Organic Act, CFR, Title 7, applicable sections of the US Code, the Forest Service Manual, and Forest Service Handbooks).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>As noted in the findings associated with Criterion 1.1.a, operations on the ANF were observed to be in full compliance with law and regulations. These assessed laws and regulations include those explicitly listed in this Additional Consideration: NEPA, ESA, Clean Water Act, NFMA, MUSYA, The Wilderness Act, Wild and Scenic Rivers Act, Organic Act, CFR, Title 7, applicable sections of the US Code, the Forest Service Manual, and Forest Service Handbooks).</p>
<p>AC 1.1.2. Managers of National Forests shall comply with state, county, local and municipal laws except where federal law preempts state, county and local laws. When federal laws preempt compliance with those of other jurisdictions, corresponding statutes or regulations shall be specifically referenced and described.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>As noted in the findings associated with Criterion 1.1.a, operations on the ANF were observed to be in full compliance with law and regulations. Stakeholder concern on State BMPs, particularly stream crossing, was found to not be an issue (see findings associated with Criterion 1.1.b). No instances were determined where federal laws preempt compliance with those of other jurisdictions.</p>
<p>NOTES: None</p>	
<p>1.2 All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid</p>	
<p>Criterion Level Remarks: Conformance. The ANF has regularly paid all applicable payments in lieu of taxes as per Public Law 60-136 and 106-393.</p>	
<p>1.2.a. Taxes on forestland, timber, and other fees related to forest management are paid in a timely manner and in accordance with federal, state, county, municipal, and tribal laws.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The federal government does not pay taxes on forest land, timber, and other fees related to forest management. Instead, since 1908 local communities have directly benefited from the presence of a National Forest in their county by a payment of receipts via Public Law 60-136, the "Twenty-Five Percent Fund." Twenty-five percent (per centum) of all monies received during any fiscal year from each national forest are paid to affected counties at the end of each year. In October 2000, the U.S. Congress signed Public Law 106-393 titled the "Secure Rural School and Community Self-Determination Act of 2000." The Act addresses the decline in revenue from timber harvests in recent years received on federal land, and stabilizes payments to counties that help support roads and schools, among other outcomes. In 2005, the ANF counties chose the full payment option of Public Law 106-393.</p> <p>The ANF provided documentation of this recent payment to counties, including a letter dated January 10, 2006, indicating Title I and III payments made to Elk, Forest, McKean, and Warren counties for 2005, totaling \$6,427,344.22.</p>
<p>NOTES: None</p>	
<p>1.3. In signatory countries, the provisions of all the binding international agreements such as CITES, ILO conventions, ITTA, and Convention on Biological Diversity, shall be respected.</p>	
<p>Criterion Level Remarks: Conformance.</p>	

<p>1.3.a. Forest owners or managers comply with treaties ratified by the U.S. Senate, which includes treaties with American Indian tribes.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Based on field and document reviews, the ANF is in compliance with all legal international agreements and treaties.</p> <p>The ANF was described as interacting appropriately and continually with American Indian tribes (e.g., the SNI) (see findings associated with Principle 3).</p> <p>ANF employees, while cognizant of the problems associated with harvesting rare and endangered species (e.g., ginseng), were not aware of CITES (OBS 1/06). Harvesting of RT&E species was reported by ANF staff as not occurring on the Forest.</p>
<p>1.3.b Forest owners or managers comply with ILO Labor Conventions impacting forest operations and practices and the ILO Code of Practice on Safety and Health in Forestry Work.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The Fair Labor Standards Act is considered a suitable substitute in the U.S. for ILO Conventions. ANF was found to comply with the Fair Labor Standards Act.</p>
<p>NOTES: OBS 1/06. ANF could make compliances with international agreements, as ratified by the U.S. Senate (e.g., CITES, Convention of Biological Diversity), more explicit in forest management planning and operation. (Indicator 1.3.a.)</p>	
<p>1.4. 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 the involved or affected parties.</p> <p><i>Applicability note to Criterion 1.4: When the certifier (i.e., the FSC-accredited certification body) and the forest owner or manager determines that compliance with laws and the FSC Principles cannot be simultaneously achieved, the matter is referred to FSC.</i></p>	
<p>Criterion Level Remarks: Conformance.</p>	
	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF and the USDA Forest Service and National Forest Systems in general were found to not be in conflict, in terms of law and regulations, with the FSC Principles and Criteria.</p>
<p>NOTES: None</p>	
<p>1.5 Forest management areas should be protected from illegal harvesting, settlement, and other unauthorized activities.</p>	
<p>Criterion Level Remarks: Conformance. Forest management areas were well protected from unauthorized use.</p>	
<p>1.5.a. Forest owners or managers implement measures to prevent illegal and unauthorized activities in the forest.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>No illegal and other unauthorized activities were observed on the Forest during the field portion of the test evaluation. Many procedures and practices were reviewed and observed that were the basis of these observations. Boundary maintenance was exceptional. Gating was well planned and put into practice to balance open use of the Forest, yet protect natural resources as needed. Law enforcement program activities apparently were adequate to aid in protection of forest resources. ATV use—commonly a degrading, unauthorized activity across the eastern U.S.—was</p>

	<p>controlled with focused riding on designated trails. Only a few stakeholders commented on ATV use. One stakeholder commented: “ ... be more ATV friendly”, which can be interpreted to mean that ATV activity is restricted on the ANF. No comments from staff or stakeholders were received on any observed negative effects of ATV use on the ANF, as confirmed in the field during the test evaluation, a testament to the enforced use of designated trails.</p> <p>While illegal timber harvesting has periodically occurred, it has been minimized by clear marking of sale boundaries and cut trees, and aggressive legal action against illegal harvesters.</p>
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NOTES: None

1.6 Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.

Applicability note to Criterion 1.6: This criterion is guided by FSC Policy and Guidelines: Partial Certification for Large Ownerships (BM19.24), May 2000.

Criterion Level Remarks: Minor non-conformance. The ANF has not committed to the FSC Principles and Criteria.

<p>1.6.a. Forest owners or managers provide written statements of commitment to the FSC Principles and Criteria. The commitment is stated in the management plan [see 7.1], a document prepared for the certification process, or another official document.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF has not provided written statements of commitment to the FSC Principles and Criteria (CAR 1/06).</p>
<p>1.6.b. Forest owners or managers notify certifiers of changes in ownership and/or management planning.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Given the federal strictures on land management of a National Forest, it is fully expected that the ANF would notify SW of any changes in ownership and/or management planning. Such information is made available in common to all citizens of the United States.</p>

NOTES: **CAR 1/06:** The ANF shall develop a written statement of commitment to the FSC Principles and Criteria. (Indicator 1.6.a)

PRINCIPLE 2. TENURE AND USE RIGHTS AND RESPONSIBILITIES - Long-term tenure and use rights to the land and forest resources shall be clearly defined documented and legally established.

<u>Criteria and Indicators</u>	<u>Findings</u>
<p>2.1 Clear evidence of long-term forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p>	
<p>Criterion Level Remarks: Conformance. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, lease agreements) were demonstrated to the team and were found to be clear and readily accessible. Boundary line supervision comes under the auspices of the ANF’s Land Surveyor and was clearly explained and procedures documented. During the field audits there was considerable ground-truthing of forest boundaries and they were found to be exceptional.</p>	
<p>2.1.a. Forest owners or managers make available information on legal and customary rights of use associated with the forest. These rights include both those held by the party seeking certification and those held by other parties.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF is mandated by law to provide a multitude of ecosystem services to society which includes watershed protection, plant and animal habitats, cultural history,</p>

	<p>recreation, wood products, and research and demonstration. These services allow for a large number of customary use rights on the land base such as timber harvesting and recreation. Recreational activities include hunting and angling, hiking, cross-country skiing, ATV and snowmobile use, as well as a number of non-consumptive activities such as wildlife watching, wilderness exploration, picnicking, swimming, and camping.</p> <p>Approximately 93% of the subsurface mineral rights on the ANF are owned by outside parties. Information and documentation was made available to the evaluation team on the development of subsurface resources (i.e., OGM) and the role of the ANF and privately held resource ownerships. The example provided concerned development of oil and gas wells by the Seneca Nation Corporation and various development lots in McKean County. A key document, for each lot, is the "Erosion & Sedimentation Control Plan; Oil and Gas Well Development." Plans are reviewed by the ANF prior to development of a well site. A draft document titled "Allegheny National Forest Oil, Gas and Management, 2006 Action Plan for Improved Efficiency and Effectiveness" proposed by the OGM Task Force was provided to the team. The document concerns how the ANF can better manage the forest in conjunction with OGM activities.</p> <p>Information on legal and customary use rights is readily available to the general public. ANF provided auditors with various documents to confirm this. For example, information related to recreational use on the ANF can be found in the National Visitor Use Monitoring Results report completed by the USDA Forest.</p>
<p>2.1.b. Land boundaries are clearly identified on the ground by forest owners or managers prior to commencement of site-disturbing activities (e.g., burning, harvesting, regeneration and intermediate treatments, chemical applications, road building).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All lands, prior to establishment of the ANF, were privately held. The Land Program Manager presented to the evaluation team evidence of clear title to ANF lands. A randomly requested deed and an abstract folder were reviewed on-site. In cases where there was no abstract, title insurance is acquired by the ANF.</p> <p>Boundary line supervision comes under the auspices of the ANF's Land Surveyor. This individual oversees two types of service contracts. The first is the Boundary Line Maintenance Service Contract where boundary lines are maintained in cases where disturbances, such as blowdown have created boundary line gaps. This work is supervised by a licensed surveyor. The second, is the Boundary Retracement Survey Contract where resurveying occurs whenever any type of forest activity is to occur (e.g., a timber sale). Again, this work is supervised by a licensed surveyor. During the field</p>

	visits there was considerable ground truthing of forest boundaries by the team. All boundaries were clearly and appropriately marked.
NOTES: None	
2.2 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.	
Criterion Level Remarks: Conformance. As a unit of the USDA Forest Service, the ANF is required to abide by an extensive array of legislative and regulatory mandates covering all activities and operations ranging from planning processes, infrastructure development, forest management, employee relations, and law enforcement.	
2.2.a. Forest owners or managers allow well-established customary and lawful uses of the forest to the extent that they are consistent with the conservation of forest resources and the objectives stated in the management plan.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF does allow a multitude of forest uses that are both customary and lawful (e.g., hunting, fishing, camping, ATV use in designated areas). While the ANF is mandated by law to manage for multiple uses, there are also a number of legislative mandates ensuring that established uses of the forest take place to the extent that they are consistent with the conservation of forest resources and objectives stated in the Forest Plan. For example, the planning process is enhanced by the National Environmental Policy Act of 1969. This Act brought environmental analysis and public participation into planning of federal activities. The NEPA process makes information available to the public both before decisions are made and prior to taking action. To illustrate this, in recreation management, a NEPA report must be written whenever there is an earth disturbance related to recreation development (e.g., ATV trail development) or in relation to a social issue (e.g., vista clearing on a hiking trail). EISs have to be written in order to be in compliance with NEPA and other relevant regulations. In the Forest Plan, EISs document the effects of implementing various forest management options.</p>
2.2.b. On ownerships where customary rights of use and traditional and cultural areas/sites exist, forest owners or managers consult (with a view to obtaining free and informed consent) with concerned groups in the planning and implementation of forest management activities.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Consultations, beyond that required by law with concerned groups, are regularly held. As a specific example, ANF works with the SNI and also uses them as a point of contact with other tribes. Resources that would be customarily used by the Nation (e.g., for gathering) are acknowledged and access to those resources is permitted by the ANF. ANF staff and the SNI met during the team's visit to discuss Forest Plan revision. A second meeting is scheduled. ANF has agreed to have the SNI orchestrate the meeting and open it up to all tribal entities related to the SNI.</p> <p>The ANF also consults with the U.S. Fish and Wildlife Agency on issues related to wildlife, especially in terms of RT&E species (e.g., Indiana bat roosts) relative to forest management activities. Examples were provided in the PLRMP</p>

NOTES: None	
2.3 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.	
Criterion Level Remarks: Conformance. Relative to the size, extent, complexities, and responsibilities of the ANF and the USDA Forest Service, the number of lawsuits revealed and described to the evaluation team were not viewed as out of character. There are few disputes over tenure claims and use rights. Those that exist are usually dealt with in a non-confrontational manner.	
2.3.a. Forest owners or managers maintain relations with community stakeholders to identify disputes in their early stages. If disputes arise, a forest owner or manager initially attempts to resolve them through direct discussions, negotiations, and/or mediation. If these good-faith efforts fail, federal, state, local, and/or tribal laws are employed to resolve disputes over tenure and use rights.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF regularly communicates with various special interest groups to promote and enhance use rights. For example, staff continually meet with the SNI to discuss issues related the forest planning and management. Others include recreational and historical groups. (e.g., federal and state agencies, Allegheny Valley Trails Association, Warren County Historical Society).</p> <p>When other issues develop (e.g., adjacent landowner boundary line disputes) the staff attempts to resolve the matter through negotiated settlement. However, if the situation remains unresolved the staff eventually will direct their efforts to the Office of the General Counsel, who will provide legal opinions and services related to the problem.</p> <p>In some instances good faith efforts may necessitate the need for law enforcement. The USDA Forest Service is authorized by federal law to enter into contractual agreements with local and state law enforcement agencies to allow for reimbursement for dedicated law enforcement activities conducted on National Forest lands. The ANF currently has contracts with the Warren and Forest County Sheriff's Offices.</p>
2.3.b. Forest owners or managers provide information regarding unresolved and ongoing disputes over tenure and the rights of use to the certifying body.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The Land Program Manager revealed that there has been one claim related to the ANF on disputed landownership in the last three years. In this case, the Land Surveyor verified the issue in dispute which dealt with a small parcel of land and the situation was corrected immediately. In addition to resurveying parcels of land, ANF's abstract files also are of great use in these disputes. In most cases, the USDA Forest Service has been found to be correct in their opinions held prior to resolution. For the ANF, there are no recent court cases.</p> <p>Other disputes have the potential to arise in regard to road use and payment of use of the certain roads and other access issues. The Land Programs Manager stated these are usually resolved in a non confrontational manner and have not turned into major</p>

	<p>issues.</p> <p>Several anonymous stakeholders expressed dissatisfaction with the presence of oil and gas wells on the ANF in the mail survey; however, none of these were revealed to be of a legal nature, or to represent disputes over tenure or use rights.</p>
2.3.c. The forest owner or manager is not involved in outstanding disputes of substantial magnitude involving a significant number of interests in relation to tenure claims and use rights.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The Ecosystem Management Staff Officer and the Land Program Manager both stated that there were not a large number of significant disputes related to tenure claim and use rights. Stakeholder consultations did not uncover any claims from outside parties involving substantial disputes in relation to tenure claims and use rights..</p>
NOTES: None	

PRINCIPLE 3. <i>INDIGENOUS PEOPLE'S RIGHTS</i> - The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.	
<i>Applicability Note to Principle 3: The terms "tribes", "tribal" or "American Indian groups" in indicators under Principle 3 include all indigenous people in the US, groups or individuals, who may be organized in recognized or unrecognized tribes, bands, nations, native corporations, or other native groups.</i>	
<u>Criteria and Indicators</u>	<u>Findings</u>
3.1 Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	
Criterion Level Remarks: Not applicable. There are no lands owned by indigenous peoples on the ANF, nor are there any forest management activities undertaken on their lands.	
3.1.a. Forest-management planning on tribal lands includes a process for input by tribal members in accordance with their laws and customs.	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>There are no lands owned by indigenous peoples on the ANF, nor are there any forest management activities undertaken on their lands. .</p>
3.1.b. Forest management on tribal lands takes place only after securing the informed consent of tribes or individuals (such as allottees (see Glossary)) whose forest is being considered for management.	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>There are no lands owned by indigenous peoples on the ANF, nor are there any forest management activities undertaken on their lands.</p>
NOTES: None	
3.2 Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	
Criterion Level Remarks: Conformance. Although no tenure rights exist on the ANF, the staff takes extraordinary measures to ensure that indigenous peoples resources, both on and off the forest, are not threatened or diminished. This is due, in part, to ANF outreach and cooperation with the SNI and other heritage resource-related partners.	
3.2.a. Forest owners or managers identify and contact American Indian groups who have current legal or customary rights to use the management area, and invite their participation in jointly planning forestry operations that affect their resources.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>A separate process exists for indigenous people (e.g., SNI) to provide input to the ANF on a wide variety of issues. ANF has a designated tribal liaison, titled the Heritage Resource Program Manager/Forest Archaeologist/Tribal Liaison, who serves as a major facilitator of this process. ANF incorporates tribal input</p>

	<p>in their management planning, particularly in regard to sites relating to indigenous peoples that exist on the forest. Meetings have occurred in the past and continue today that seek to solicit SNI inputs.</p> <p>ANF works with the SNI and also uses them as a point of contact with other tribes. Resources that would be customarily used by the Nation (e.g., for gathering NTFPs) are acknowledged and access to those resources is permitted by the ANF. ANF staff and the SNI met during the team's visit to discuss Forest Plan revision. A second meeting is scheduled. ANF has agreed to have the SNI orchestrate the meeting and open it up to all tribal entities related to the SNI. By agreeing to this, the ANF staff felt there will be more participation than if the meeting was held as an "ANF meeting" solely.</p>
<p>3.2.b. On lands adjacent to tribal lands or falling within watersheds that affect tribal lands, steps are taken to ensure that forest management does not adversely affect tribal resources.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Significant off-site heritage resources are protected, in part, through efforts of the ANF and its various partners. Often, ANF will work with private landowners to protect archaeological sites. Representative sites have been found along many wild and scenic rivers. Indian God Rock is one such site located on the Allegheny River about 8 miles south of Franklin, Venango County, Pennsylvania. The Rock is archaeologically significant, bearing some of the few authentic Native American petroglyphs possibly dating back as far as 1200 A.D. The ANF worked with the Venango Museum of Art, Science and Industry, located in Oil City, Pennsylvania and the Allegheny Valley Trails Association, an all volunteer, non-profit organization founded in 1990 that helps provide interpretation to the public. When the site was being vandalized it was felt that an official presence was necessary to provide enhanced interpretation and protection of the Rock. One activity involved building a deck on a nearby overlook to act as a psychological barrier to combat vandalism.</p> <p>There have been efforts to cooperate on mutually beneficial activities. With the U.S. Army Corps, the ANF, in cooperation with the SNI, has visited the Allegheny Reservoir and surrounding SNI lands up into New York. This exercise provided the ANF with valued information, observations, and expertise on how to take site protection measures on the ANF on areas related to indigenous peoples. It also provided ANF staff with additional information that can further interpret what is known about past activities of regional indigenous peoples.</p> <p>The ANF Liaison stated that there were no effects on tribal resources from forest management off property and this was ensured through the cooperative</p>

	arrangements and communications with the SNI and other partners.
AC 3.2.1. Solicitation of tribal collaboration is tailored to incorporate cultural sensitivity and awareness and to honor nation-to-nation relationships.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>As previously stated, ANF staff and the SNI met during the team's visit to discuss forest plan revision. A second meeting is scheduled. ANF has agreed to have the SNI orchestrate the meeting and open it up to all tribal concerns of the SNI. By agreeing to this, the ANF staff felt there will be more participation than if the meeting was held as an "ANF meeting" solely. This action was viewed by the ANF and SNI as a culturally sensitive collaboration.</p>
AC 3.2.2. Consultation techniques used for soliciting tribal input are adapted as necessary to achieve effective communication and collaboration.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The document titled "Programmatic Agreement Among The U.S.D.A. Forest Service, Allegheny National Forest, The Pennsylvania State Historic Preservation Officer and The Advisory Council on Historic Preservation Regarding The Process for Compliance with Section 106 of The National Historic Preservation Act for Undertakings on the Allegheny National Forest of the Eastern Region of the U.S.D. A. Forest Service" includes the types of consultation techniques that can be used for soliciting tribal input aimed at achieving effective communication and collaboration. Page 9 of the Programmatic Agreement (PA) outlines procedures for both formal (e.g., following standards and guidelines for reporting and database entry) and informal (e.g., using electronic media) consultation, coordination, and information exchange between the ANF, the State Historic Preservation Officer (SHPO), the Council, and Native American tribes. From the standpoint of the ANF, these techniques have been effective. While no tribal representatives were directly consulted several were sent mail surveys. No information was collected to contradict the ANF claims.</p>
NOTES: None	
3.3 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.	
Criterion Level Remarks: Conformance. The ANF, and specifically its archaeologists, oversee identification, protection, and interpretation of sites of special cultural, ecological, economic, or religious significance to indigenous peoples and other groups both within, and where feasible, outside its boundaries. This is done under legislative mandates and guidelines and in cooperation with Native American tribes, agencies, organizations, and other public and private entities. Confidentiality, when appropriate and necessary, is a high priority for the ANF.	
3.3.a. Forest owners or managers invite tribal representatives to identify sites of current or traditional significance within the property proposed for certification.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF, in compliance with its management's legislative mandates, has historically incorporated tribal consultations into their management plans and in their designation of historic sites of significance. As this participation is mandated in the PLRMP, ANF is proactive in soliciting participation from tribal representatives.</p>

<p>3.3.b. Forest owners or managers develop measures to protect or enhance areas of special significance. Forest owners or managers invite tribal representatives to help develop these measures.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF goals are to protect, preserve, and enhance interpretation of important sites and areas of special significance. ANF forest management planning incorporates a strategy to perform these activities. Within ANF Project Areas the staff decipher what can be learned in terms of past activity. ANF has five archaeologists who oversee the identification, protection, and interpretation of sites of special cultural, ecological, economic, or religious significance to indigenous peoples and other groups. Sites are identified through internal processes and in cooperation with the SNI, and by working with state agencies such as The Pennsylvania State Historic Preservation Commission. For consultation on a project, the ANF staff will travel to the SNI office to discuss issues and vice-versa. This process stresses looking at forest management from a more holistic view. Page 8 of the National Historic Preservation Act states that the ANF shall follow the Secretary of Interior's Standards for Preservation Planning.</p> <p>The condition and integrity of a site might qualify it for the National Register of Historical Places which is the Nation's official list of cultural resources worthy of preservation. Placing a site under this classification is an ANF staff goal.</p> <p>Other partnerships, beyond the above mentioned, also are used to enhance protection and enhancement activities. Established relationships exist with Mercyhurst College, Erie, Pennsylvania; University of Pittsburgh at Bradford, Pennsylvania; and Clarion University, Clarion, Pennsylvania to name a few.</p> <p>The ANF is also a part of various other efforts that have contributed to supporting the protection or enhancement of areas of special significance. One such initiative, The Lumber Heritage Region (LHR) was based on a Native American historical context. This "Region," was designated in 2001 as one of Pennsylvania's 12 Heritage Areas. The LHR is a local grassroots project with the purpose of highlighting and interpreting the rich cultural, historic, natural, and recreational resources of Pennsylvania's forests.</p>
<p>3.3.c. Confidentiality of disclosures is maintained in keeping with applicable laws and the requirements of tribal representatives.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF is mandated by law to maintain confidentiality as they are excluded from the strictures of the Freedom of Information Act (FOIA). Legislation which ensures confidentiality consists of the ARPA of 1979 and the National Historic Preservation Act of 1966 as amended through 1992. In addition, the National Historic</p>

	Preservation Act also provides standards and guidelines on confidentiality.
NOTES: None	
3.4 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 is formally agreed upon with their free and informed consent before forest operations commence.	
Criterion Level Remarks: Conformance. While cooperation exists between the ANF and the SNI, there are no instances where exchange of knowledge or intellectual property has translated directly into a commercial endeavor. Thus, while knowledge and information is shared and held in the strictest confidence by both parties, there is no need to develop agreements related to commercialization.	
3.4.a. Forest owners or managers respect the confidentiality of tribal knowledge and assist in the protection of tribal intellectual property rights.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The ANF's Heritage Resource Program Manager/Forest Archaeologist/Tribal Liaison conveys to the SNI and other groups, the ANF's respect for confidentiality of tribal knowledge and their willingness to assist in protecting tribal intellectual property rights. The Liaison continually reinforces this to the four other employees working in this area. The Liaison stresses the need to have a high standard of ethics as they go about protecting, preserving, and interpreting the past.
3.4.b. Where indigenous intellectual property and forest products are commercially exploited, a written agreement with individuals and/or tribes is reached prior to commercialization.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> There were no cases where indigenous intellectual property and forest products have been commercially exploited. Hence, no written agreements are needed.
3.4.c. Individuals and/or tribes are fairly compensated when commercialization of intellectual property or forest products takes place.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> There have been no past cases or reasons for providing compensation to indigenous peoples (i.e., the SNI).
3.4.d. When traditional, ecological knowledge is requested for use in forest management, protocols are jointly developed with local tribes to protect the intellectual property rights of those tribes.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Traditional knowledge that is shared is strictly confidential and understood by both sides. In addition, the ANF has a legislative mandate to protect such knowledge.
NOTES: None	

PRINCIPLE 4. <u>COMMUNITY RELATIONS AND WORKERS' RIGHTS</u> - Forest management operations shall maintain or enhance the long-term social and economic well being of forest workers and local communities.	
<u>Criteria and Indicators</u>	<u>Findings</u>
4.1 The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	
Criterion Level Remarks: Conformance. Communities and their citizenry residing within, or adjacent to, the ANF have unique opportunities for employment, training, and advancement. Beyond services related to economic opportunities, the local area also benefits in a multitude of ways from social and environmental services provided by the ANF.	
4.1.a. Forest work is packaged and offered in ways that create quality work opportunities for employees, contractors, and their workers.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The Lead Contracting Officer Northeastern Acquisition Team, in conjunction with the Forest Supervisor, oversees contracting responsibilities on the ANF. The

	<p>Officer believes that contractor relations are positive and that contractors view the ANF as an employer of choice. This is validated by long-term re-bidding by contractors on the ANF, some of whom have had up to 25-year relationships.</p> <p>The extremely diverse activities engaged in by the USDA Forest Service and ANF leads to quality and challenging work opportunities for the staff. All opportunities for employee advancement are made available to all USDA Forest Service employees through its competitive procedures for advertising all vacancy announcements. Another process for doing this comes under the Merit Promotion Procedures. Those eligible include status (i.e., career or career-conditional) employees and persons meeting special hiring authorities. The Merit Promotion Plan can be found in the Forest Service Handbook FSH 6109.12, Chapter 20 - Internal Placement. The other outlet detailing employee advancement is the DEMO Authority. The DEMO Handbook can be found in the Forest Service Handbook 6109.16, Demonstration Project Handbook. On occasion there also are temporary details provided on positions for career or skill enhancement made available.</p> <p>Both USDA Forest Service and contractors are encouraged to participate and provide input into decision-making processes. Contractors, who are more locally involved, have access to their Technical Representative on the ANF to provide feedback. However, these actions are performed within the constraints of procedures and regulations under which the USDA Forest Service must act. ANF employees at lower grade levels in the organizational hierarchy are given few opportunities to provide inputs. These employees were not consulted prior to the federal move to a more centralized business plan for operations. Several current and former employees have expressed a dissatisfaction and demoralization with this process as well as with the introduction of "Enterprise Teams" where activities involved with these groups were viewed as time consuming and inefficient. There also exists an apprehension revolving around future outsourcing for services. It was understood that moves toward a centralized business plan were going to be reevaluated after implementation but several employees saw an "after the fact" approach as counter productive (OBS 2/06).</p>
<p>4.1.b. Conditions of employment (e.g., remuneration, benefits, safety equipment, training, and workman's compensation) are as good for non-local workers as they are for local workers doing the same job.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>For all federal employees, the same pay scale, job description, benefits, and other related items apply throughout the United States. Thus an employee's</p>

	<p>status as local or non-local is immaterial.</p> <p>All full- or part-time USDA Forest Service employees with employment exceeding 90 days are eligible to earn sick and annual leave. The amount is determined by the leave category they are in, but it is a minimum of four hours per bi-weekly pay period which is pro-rated for part-time employees. The federal government Federal Friendly Family Leave Act is available to employees with certain restrictions. Information on this Act can be found at: http://www.opm.gov/oqa/leave/index.asp.</p> <p>Permanent employees are eligible to participate in a three-tiered retirement package which is composed of The Federal Employment Retirement System/Thrift Savings Plan/Social Security. They may sign up for Federal Employees Health Benefits and Life Insurance. Information on these programs is found at: http://fswb.wo.fs.fed.us/hrm/benefits/. The Safety Plan for the ANF outlines an employee wellness program available to all permanent employees.</p>
<p>4.1.c. Forest owners or managers utilize qualified local foresters, loggers, and contractors.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Operating under the Equal Opportunity Employment Act (EOEA) the USDA Forest Service provides an even playing field for local candidates vying for positions. While preferences cannot be made based on U.S. residence, many local and state residents are employed. The contractor pool also comes primarily from the local population. The ANF, with almost 200 full- and part-time employees and the multitude of activities they engage in, provides a positive economic infusion to the local and state economy by stimulating employment and enhancing income and the tax base for the local population.</p> <p>The ANF employs a diverse group of resource professionals including foresters, wildlife biologists, hydrologists, soils scientists, recreation specialists, engineers, archaeologists, and landscape architects. To qualify for these kinds of positions, individuals must meet the standards required by the USDA Forest Service Office of Personnel Management for a particular position and grade. Occasionally, the USDA Forest Service will contract with resource professionals and, in these instances, the contractor would need to show how they meet the qualifications needed for a specific task. Most of the contracting on the ANF generally falls under tasks related to inventory work, reforestation, transportation, and wildlife habitat activities.</p> <p>As required by regulation (36 CFR223.101), the ANF conducts a determination of responsibility for timber sale purchasers. The intent of the determination is to ensure</p>

	<p>the USDA Forest Service is doing business with a reputable firm capable of completing the contract and to reduce the risk of defaulted contracts. This review includes looking at the financial health of the business operation, the operator's record of performance and business integrity, the environmental standard the operator works within, and the operator's record of timely payments. The ANF's Timber Sale Contracting Officer, in concert with a qualified accountant, makes this determination based upon information submitted by the purchaser and contacts made with references that are provided by the contractor.</p> <p>Service contracts are used for a wide array of tasks such as inventory, reforestation, transportation, and wildlife habitat. When a contract is advertised, specifications for a particular type of work, means in which the work is to be completed, and safety standards to be followed are included. A potential contractor must be able to demonstrate that they can work within contract specifications. If a particular kind of certification is a contract requirement, they would need to be able to show their qualifications.</p>
<p>4.1.d. Forest managers and their contractors give preference to qualified local workers.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>To the extent feasible, and as allowed by law, workers from local communities are employed on ANF projects. Local workers are certainly not discriminated against based on their local status. Employee interviews with both those who were originally from the area and those that moved to the area around the ANF confirmed that there has been no discrimination. When filling employee vacancies, preference cannot be given to local candidates because the ANF is a part of a federal agency where preferences are not permitted based on residency. Vacancy announcements are generally given wide distribution to generate an adequate list of qualified candidates. Contracts are advertised and made available to any and all interested parties, regardless of whether they are within the local area or not. For contracts less than \$25,000, the ANF will try to do business with the local service area. When the contract amount exceeds \$25,000 there is a full and open contract advertisement to all interested parties.</p>
<p>4.1.e. Forest owners or managers procure goods and services locally.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Unless there is a national contract, the ANF staff communicated to the team that they try to purchase goods and services from local small businesses. Again, when the purchase amount exceeds \$25,000 there is a full and open contract available to all interested parties.</p>
<p>4.1.f. Forest owners or managers participate in local economic development and civic activities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>State and Private Forestry (the third branch of the</p>

	<p>USDA Forest Service) does a great deal of work related to local economic development through a variety of ways. They work with local landowners in various management issues, provide opportunities for technology transfer, and sponsor grant programs. For example, the ANF is currently working with the Kane Area School District to apply for a Biomass Energy Utilization System grant to convert their administrative facility from one that generates heat from natural gas to one that utilizes wood chips.</p> <p>The ANF has a staff member who works directly with USDA Rural Development and is a member of many local boards/committees (e.g., Lumber Heritage Region Committee, Tionesta Hunting and Fishing Museum, local tourism and vacation promotion boards). Other staff are members of state and county committees, the Pennsylvania Environmental Management Advisory Council, and the Governor's Task Force for Pennsylvania Wilds, a tourism promotion effort (http://www.visitpa.com/visitpa/wilds.do). Staff members also attend Pennsylvania Hardwood Development Council meetings.</p> <p>ANF employees frequently participate in local community events (e.g., parades, festivals). They enhance these events by bringing along USDA Forest Service-based characters Smokey the Bear and Woodsy Owl. ANF employees visit local schools and make environmental presentations. Presentations are also made to other local organizations which include many hunting and sportsmen's clubs.</p> <p>On the forest, the ANF reaches out to the community in a number of ways. For example, they allow special use permits for local fund raisers as appropriate. In one case, Marienville, Pennsylvania has been able to sponsor a Tour d' Forest ATV event for the past 10 years.</p> <p>Tax revenues generated from timber harvests have been in decline from 1996 levels. The reduced tax dollars have impacted USDA Forest Service generated revenues from timber sales for school districts, township roads, and county activities. Federal subsidies emanating from the Secure Rural Schools Act, used to offset reduced sale revenues, are due to be discontinued by 2007. This situation has created a great deal of anxiety and uncertainty in local affected communities. In addition, forest industry also has been negatively affected by the reduced cut.</p>
<p>4.1.g. Forest owners or managers contribute to public education about forestry practices in conjunction with schools, community colleges, and/or other providers of training and education.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF employees routinely participate in activities with local schools and colleges. Presentations on all aspects</p>

	<p>of forest management have been made to each with two and three made in April and early June 2006, respectively. Presentations are made to groups and organizations when requested. The ANF also has a number of partnerships with several universities for long-term projects. Over the years, opportunities have been provided for interns to work on a variety of projects.</p> <p>The USDA Forest Service Northeastern Research Station does a considerable amount of research and technology transfer for the ANF and is a major contributor to increasing the ANF's professional understanding of forest management practices. Research findings are published in refereed journals or in station publications that are made available to the ANF staff and the public. The local research unit has been recognized as being a leader in the technology transfer arena. Forest land within the ANF also is often used in research projects undertaken by the Station.</p> <p>The ANF is offered as training and/or an educational resource for the public and presentations, in cooperation with ANF staff, are made about responsible forestry in local schools.</p>
<p>4.1.h. Employee compensation and hiring practices meet or exceed the prevailing local norms for work that requires an equivalent education, skills, and experience.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The USDA Forest Service pay schedule, which is uniform throughout the organization (including the ANF), is based on Office of Personnel Management job classifications. Salaries are competitive with those offered in private industry for the same job positions.</p>
<p>4.1.i. Forest owners or managers and their contractors comply with the letter and intent of applicable state and federal laws and regulations (see also 1.1.a)</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF, as a part of the USDA Forest Service is required to comply with, and follow, many laws and regulations. Laws and regulations are a part of every aspect of the ANF's forest management operations, activities, and human resource relationships.</p> <p>Employees are not discriminated against because of gender, race, religion, age, and disability with respect to hiring, dismissal, remuneration, and other conditions of employment.</p> <p>There are two primary areas of contractual agreements, timber sale and service contracts. Contracts are established with the intent of complying with all applicable state and federal laws. The on-site visit confirmed that they are complying with the law.</p>
<p>4.1.j. Forest owners or managers provide and/or support opportunities for workers to improve their skills through training.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All permanent employees have an individual development plan that includes short- and long-term</p>

	<p>career goals, and identifies appropriate training needed to reach these goals. This plan is reviewed annually by the Administrative Coordinator.</p> <p>Training needs are discussed with new hires and twice a year with the appropriate supervisor. Employees normally have an opportunity for some kind of training every year. Regions 8 and 9 (ANF) have taken the approach of sponsoring a two week 'university' for all regionally applicable training. Employees from all forests attend these sessions in a central location allowing for an opportunity to periodically engage in the exchange of ideas and allowing for meaningful contacts with peers on other forests.</p> <p>On-line training is available and encouraged using the Ag-Learn System which also keeps track of training and future commitments.</p>
<p>AC 4.1.1. A comprehensive listing of all applicable laws, regulations and administrative requirements and their applicability to USFS forest management shall be maintained with listed documents made accessible to all employees.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All Forest Plan laws are web-based and accessible to all employees. All new employees are given an orientation booklet which contains all applicable laws. At all annual reviews employees are asked if they still have the booklet in their possession and if they are knowledgeable about applicable laws, regulations, and administrative requirements.</p>
<p>AC 4.1.2. Migrant worker conditions (including transit to and from work sites) are monitored by both contractors and Forest Service personnel for compliance with USFS policies and contract specifications, applicable labor laws and other associated regulations.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Migrant worker issues are covered by including H2B clauses in timber and service contracts. These clauses cover items related to wages, living conditions, transportation, safety, and sanitation. Also, the Conservation Office Representative meets and reviews work duties with contractors before work begins to go over expectations for proper footwear, safety, supplies, and housing for migrant workers. ANF employees stated that they follow-up with contractors to ensure these expectations are being met.</p>
<p>NOTES: OBS 2/06: The USDA Forest Service and the ANF could look to their employees for inputs and comments on the ongoing centralization of services and the drive toward more efficient operations before implementing such actions. (Indicator 4.1.a)</p>	
<p>4.2 Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	
<p>Criterion Level Remarks: Minor non-conformance. Measures taken to ensure the safety and the well-being of employees are exemplary. However, field audits uncovered logging contractors who were not fulfilling the safe guards built into the Timber Sale Contracts.</p>	
<p>4.2.a. Forest owners or managers and their contractors develop and implement safety programs and procedures that include: (1) well-maintained and safe machinery and equipment (2) use of safety equipment appropriate to each task (3) documentation and posting of safety procedures in</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>OSHA requirements ensure that legislative mandates are in place to ensure that all applicable laws and/or regulations covering health and safety of employees are followed. The Occupational Safety and Health Act of</p>

<p>the workplace</p> <p>(4) educational efforts (such as logger training and education programs)</p> <p>(5) contracts with safety requirements</p> <p>(6) safety records, training reports, and certificates</p>	<p>1970, Executive Order 12196 and 29 CFR (Code of Federal Register) 1960 are the major laws and regulations requiring the USDA Forest Service to furnish its employees with places and conditions of employment that are free from work-related safety and health concerns. The Human Resources Specialist reviews documentation of activities such as the educational efforts related to safety. The Forest Supervisor's Office contains a number of booklets and pamphlets related to employee safety and well-being (e.g., The USDA Handbook on Workplace Violence Prevention and Response).</p> <p>Requirements for well maintained and safe machinery and equipment are addressed in 29 CFR 1910 and 1920 basis and addressed in the Health & Safety Code Handbook. Monthly preventive maintenance checks are made on all vehicles (i.e., trucks, cars, boats, snowmobiles, machinery, trailers, aircraft, ATVs). Scheduled inspection of agency aircraft are made by certified examiners, as well as all contracted aircraft and pilots, who are issued approval cards. Safety inspections and health surveys of all USDA Forest Service controlled workplaces are conducted annually. There is a Standing Forest Safety Committee that addresses interactive safety issues of all nature and types, including machinery, equipment, and personnel safety issues as well as making public risk assessments. A required Individual Health Screening is performed by qualified health professionals for persons taking the Work Capacity Test used to determine firefighting qualifications. Last, wellness screenings are periodically made available to employees and immediate family members.</p> <p>The use of safety measures and equipment by USDA Forest Service employees are appropriate for each task. A Job Hazard Analysis (JHA) for all types of work activities associated with forest management such as chainsaw work, tree marking, Timber Sale Contract administration, firefighting, and recreational work identifies risks and dangers and specific measures to mitigate hazards. JHAs also indicate the required PPE (personal protective equipment) required for each specific forest management work task. Forest Service Handbook FSH 6709.11 - Health & Safety Code Handbook discusses specific operations, equipment, machinery, and safe practices for proper operations and associated PPEs.</p> <p>Documentation and posting of safety procedures were evident in the Supervisor's Office. Individual JHAs are collectively compiled in 3-ring binders and posted in a conspicuous location so as to be available to all employees at all ANF offices. Tailgate safety sessions</p>
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	<p>involving a review and briefing of JHAs with individuals and/or crews are documented in writing and filed at District or Forest Supervisor's Office. Material Safety Data Sheets (MSDS) are filed and posted in a conspicuous location, usually together with JHAs. All employees are issued a personal copy of the Health & Safety Code Handbook.</p> <p>Educational efforts (e.g., safety training, educational programs) are undertaken at scheduled monthly safety meetings at the District and Forest Supervisor's Offices by using expert guest speakers, audio-visual presentations, discussions, and interactive involvement of employees. Mandatory annual refresher training for fireline qualified employees is undertaken before dispatch to a fire assignment. Incident Response Pocket Guides (IRPGs) are issued to each fireline qualified employee as well as daily overhead and crew safety briefings. Designated Safety and Health Representatives at Forest, Regional, and National levels receive currency training and provide leadership at their respective organizational level and provide feedback and monitoring mechanisms on safety issues.</p> <p>Service Contracts include safety requirements. For example, contracts for marking and cruising will include a requirement to review an appropriate Job Hazard Analysis for that work. ANF provides hand-held radios to contractors for routine safety contacts, to crews or individuals performing service contracts (e.g., check cruising) or crew marking, and snowmobile trail grooming. Timber Sale Contracts require the purchaser to facilitate the USDA Forest Service's safe and practical inspection of operations, and to meet state and federal requirements (BT6.33 - Safety), in 2400-6T Timber Sale Contracts. ANF also requires purchasers to sign operations adjacent to USDA Forest Service controlled roads and trails open to public travel with devices meeting requirements from the Manual on Uniform Traffic Control Devices (MUTCD).</p> <p>The standing Forest Safety Committee includes the Forest Safety Representative, and prepares an Annual Safety Plan, sets the agenda of safety meetings, issues safety warnings to all employees, maintains safety records and training reports, and issues certificates and awards annually for safe work performance. Annual safety reports are issued regarding motor vehicle accidents, lost time accidents, and payments through the Office of Workers Compensation (OWCP). Each written fireline shift plan incorporates a safety message and briefing.</p>
<p>4.2.b. Forest owners or managers require contractors to meet or exceed federal and state standards for health and safety.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF has provided its Sale Administrators with training</p>

	<p>materials and discussion sessions, to insure they are aware of the respective OSHA logging standards relative to general safety, safe chain saw operation, safe machine operation, and safe vehicle operation, and to report and document unsafe deviations from those standards, and inform the purchaser representative, as well as the USDA Forest Service Representative when violations are observed. Continued violations could result in breach of contract and suspension of operations until those violations are resolved, and a plan is put in place by the purchaser to mitigate repeat offenses.</p> <p>Contract fireline equipment is inspected for readiness, acceptable operating condition, and required safety features under the Regional Operation Program (ROPS), before being dispatched. Contractors are not hired when equipment is found to be unsafe or unsuited.</p> <p>Since the ANF is a part of a federal agency, contractors are required to meet or exceed federal and state standards for health and safety. Standard provision BT6.33 - Safety, of the Timber Sale Contract calls for the purchaser to meet state and federal requirements (i.e., OSHA Logging Standards). The provision further states that the "Purchaser has all responsibility for compliance with safety requirements for Purchaser's employees." However, field audits uncovered logging contractors who were not following the safeguards built into the Timber Sale Contracts (CAR 2/06).</p>
<p>NOTES: CAR 2/06: The ANF shall require contractors to meet or exceed federal and state standards for health and safety, including those strictures outlined in the Timber Sale Contracts for logging contractors. (Indicator 4.2.b.)</p>	
<p>4.3 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).</p>	
<p><i>Applicability Note to Criterion 4.3: Compliance with this criterion can be accomplished with guidance from FSC Certification and ILO Conventions: FSC Policy Paper and Guidelines. May 20, 2002.</i></p>	
<p>Criterion Level Remarks: Conformance. There are no restrictions imposed on workers in regard to organizing and voluntarily negotiating with the USDA Forest Service. In addition, the employee environment is enhanced by a number of programs and activities which protect workers and create an appropriate work environment.</p>	
<p>4.3.a. Forest owners or managers and their contractors develop effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The USDA Forest Service has a wide range of programs designed to increase employee awareness of cultural differences that focus on the idea of integrating and valuing differences among employees. The ANF has Special Emphasis Program Managers who identify opportunities to learn more about cultural differences and help employees become integrated into the USDA Forest Service workforce. The Allegheny National Forest/Northeastern Research Station Civil Rights Committee's Charter and Bylaws deals with many issues related to employee well being. The Committee</p>

	<p>was established to advise the Forest Supervisor and Leadership Team on Service-wide implementation of the USDA's civil rights policy and ANF's Civil Rights Program.</p> <p>The USDA Forest Service's Alternative Dispute Resolution (ADR) Program also provides an avenue to resolve any number of problems from salary issues to interpersonal communication concerns to name a few.</p>
<p>4.3.b. Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>There are no restrictions imposed on this activity. ANF staff expressed that they are free to associate with each other for the express purpose of advocating their common interests. Workers can unionize if they so desire.</p>
<p>NOTES: None</p>	
<p>4.4 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.</p> <p><i>Applicability Note to Criterion 4.4: People and groups directly affected by management operations may include: employees and contractors of the landowner, neighbors, fishers and hunters, recreationalists, users of local water, and processors of forest products.</i></p>	
<p>Criterion Level Remarks: Conformance. As a unit of the USDA Forest Service, the ANF is mandated to solicit and evaluate consultations and public input in the development and implementation the Forest Plan. NEPA requirements ensure that social impacts will be considered before management operations take place.</p>	
<p>4.4.a. Forest owners or managers contribute to designing and achieving goals for the use and protection of forest resources, as articulated in local and regional plans.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF personnel manage the forest for a multitude of uses. Legislation dictates the fundamental basis on how the forest is managed with ANF activities directed toward achieving its stated goals and guided by the 1986 Forest Plan. Forest Plans are amended over time until the next plan is completed. Management spends a considerable amount of time on Forest Plan development and has an extensive public outreach effort, as mandated by law, in this process. The primary way of considering the impacts of plans and how they will contribute goal achievement is by completing an EIS.</p>
<p>4.4.b. Forest owners or managers of large forests (see glossary) provide opportunities for people and groups affected by management operations to provide input into management planning.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Public inputs were solicited through presentations, mail, e-mail, and though the broadcast and print media throughout the entire planning process. Information and evidence provided on the public input process, while mandated by law, is still extensive and exemplary. Documented evidence was provided to the evaluation team that illustrated this effort. For example, during May and June 2006 eight presentations were made to the general public on the Forest Plan revision.</p>
<p>4.4.c. People and groups affected by management operations, such as logging adjacent to property boundaries are apprised of proposed forestry activities</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Consultations are made with individuals (e.g.,</p>

<p>(e.g., logging, burning, spraying, and traffic) and associated environmental and aesthetic effects in order to solicit their comments or concerns.</p>	<p>recreationists) and groups (e.g., adjacent landowners) directly affected by management during meetings and presentations. Notification of adjacent landowners on future forest operations is made in a number of ways (e.g., notification, postings). Public meetings and other methods (See Criterion 4.4.b) are used to solicit public inputs related to forest plans or management activities and are also used to describe impacts of any actions being considered.</p>
<p>4.4.d. Significant concerns identified in 4.4.c. are addressed in management policies and plans.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Significant concerns related to proposed forest activities and associated environmental and aesthetic effects are addressed in EISs, which are mandated by law to incorporate public input. These issues are then incorporated into the Forest Plan. This was evidenced in the PLRMP.</p>
<p>4.4.e. Significant archeological sites and sites of cultural, historical, or community significance, as identified through consultation with state archeological offices, tribes, universities, and local experts, are designated as special management zones or otherwise protected.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF has designated a number of sites of cultural and historical significance. The team visited a Heritage Site (Camp N.F. 13, 1935-1946) that was, over time, a Civilian Conservation Corps camp, a German prisoner of war camp, and Youth Conservation Corps camp site. An archeological site was observed during the test evaluation and was designated as a special management zone. Sites are identified through discovery during forest operations, but primarily by working the Pennsylvania State Historic Commission, the SNI, the Warren County Historical Society, and other organizations and individuals.</p>
<p>4.4. DOD/DOE 1. Forest managers carry out open, transparent, public consultative processes for the resolution of rights and claims (see Criterion 2.3), assessment of social impacts (see Criterion 4.4), assessment of environmental impacts (see Criterion 6.1), development and review of the management plan (see Criterion 7.1), and identification and delineation of High Conservation Value Forests (see Principle 9). Forest managers address (incorporate or provide a rationale for not incorporating) input from all interested members of the public, locally and nationally, including lay and expert stakeholders.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF is engaged in carrying out open, transparent, public consultative processes for the resolution of rights and claims (see Criterion 2.3), assessment of social impacts (see Criterion 4.4), the assessment of environmental impacts (see Criterion 6.1), the development and review of the Forest Plan (see Criterion 7.1) and in gathering public inputs for the identification and delineation of HCV attributes (see Criterion 9.1).</p>
<p>4.4. DOD/DOE 2. In addition to the public summary, full certification reports are readily accessible to interested stakeholders. Locations of sensitive resource sites and classified information may be withheld.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The Pinchot Institute for Conservation have indicated that all reports generated through this test evaluation will be made public. The USDA Forest Service is also subject to the Freedom of Information Act.</p>
<p>4.4. DOD/DOE 3. Forest management and planning operations include measures to mitigate negative effects to local communities, the forest, and water quality that might accrue from the use and disposal of hazardous materials, munitions, and other military or</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Use and disposal of hazardous materials, munitions, and other military activities do not occur in proximity to the ANF. Therefore, there is no reason to account for</p>

<p>industrial activities.</p>	<p>this in forest management and planning.</p> <p>However, OGM activities do present issues requiring measures to mitigate their negative effects to local communities, the forest, and water quality. Measures have been developed through public inputs and expert opinions in this area, and will be delineated in the Forest Plan. However, an additional effort is underway and will be implemented upon completion of the draft document titled "Allegheny National Forest Oil, Gas and Management, 2006 Action Plan for Improved Efficiency and Effectiveness" proposed by the OGM Task Force which was provided to the SmartWood evaluation team. The document delineates how the ANF can better manage the forest in conjunction with OGM activities.</p>
<p>NOTES: None</p>	
<p>4.5 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 livelihood of local peoples. Measures shall be undertaken to avoid such loss or damage.</p>	
<p>Criterion Level Remarks: Conformance. From both a legislative and regulatory standpoint, the ANF is required to take the necessary steps in their planning for, and management of, the forest to ensure that losses and damages do not occur which would impact local peoples.</p>	
<p>4.5.a. Before forest owners or managers initiate legal action, they utilize open communication and negotiation to address grievances and mitigate damage resulting from forest management activities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>There are many informal (e.g., personal contact) and formal (e.g., letters) processes available for resolution of conflicts. In all cases, the intent is to resolve conflict at the lowest possible level through informal processes using open communication and negotiation rather than those which might lead to legal action. If the problem can't be resolved at this level, the ANF employee consults with their superior, who will direct them to the Office of the General Counsel. FSM 6170 provides detailed information in this area.</p>
<p>4.5.b. Forest owners or managers and their contractors maintain liability insurance or post bonds that are adequate to cover potential liabilities</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>For contracts over \$100,000, the USDA Forest Service requires specific kinds of insurance to adequately cover potential liabilities. Contracts less than \$100,000 or those procured under simplified act procedures require contractors to follow state law which includes certain types of insurance (e.g., workman's compensation) that also covers potential liabilities. Construction contracts over \$25,000 include a payment guarantee to sub-contractors and laborers.</p>
<p>4.5.c. Forest owners or managers institute measures to avoid loss or damage to the legal or customary rights, property, resources, or livelihood of local people.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF has a number of legislative mandates to ensure that losses or damages do not occur. Most important is the NEPA process which makes information available to the public both before decisions are made and prior to taking action in the forest. To illustrate this, in recreation management a NEPA report must be written whenever there is an earth disturbance related to</p>

	recreation development (e.g., ATV trail development) or in relation to a social issue (e.g., vista clearing on a hiking trail). To be in compliance with NEPA and other relevant regulations EISs have to be written. In the Forest Plan, EISs document the effects of implementing various forest management options. Contracts and associated specifications, which are consistently used by ANF for services rendered by external entities, are effective measures for avoiding loss or damage to property, rights, resources and livelihoods.
NOTES: None	

PRINCIPLE 5. <u>BENEFITS FROM THE FOREST</u> - 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.	
<u>Criteria and Indicators</u>	<u>Findings</u>
5.1 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. <i>Applicability Note to Principle 5: Non-timber forest products are managed and produced according to Guidelines for Non-timber Forest Product Management in Appalachia (see Appendix A).</i>	
Criterion Level Remarks: Conformance. Economic viability is broadly considered and supported by the ANF, focusing on local community elements (e.g., employment, income, payments via the "Twenty-Five Percent Fund Act") rather than organizational viability. Economics are well balanced with social needs and ecological considerations. Investments are appropriate to maintain the ecological productivity of the Forest.	
5.1.a. Forest owners or managers have the resources to support long-term (e.g., decades rather than quarter-years or years) forest management, e.g., planning, inventory, resource protection, post-harvest management activities, etc.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The USDA Forest Service, as a century-old organization, has demonstrated organizational viability. Revenues and other funding have been sufficient to cover forest management costs, e.g., management planning (1986 plan, ongoing development of new plan); road building and maintenance; silvicultural treatments; long-term forest health; growth and yield monitoring; and conservation investments. A wide variety of documents indicated full activities in each of these investment areas.
5.1.b. Responses (e.g., increases in harvests or debt load) to short-term financial factors- (e.g., as fluctuations in the market, requirements for cash flow, need for sawmill equipment and log supplies) are limited to levels that enable fulfillment of the management plan.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Timber harvesting is not altered in response to short-term financial factors. All harvesting is conducted to fulfill the forest management plan objectives.
5.1.c. Investment and reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> As noted in findings associated with Criterion 5.1.a, investment and reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity. The ANF has an extraordinarily broad array of management objectives, which, by performance, were generally all well met. The issue of forest health has been overbearing over the last few decades with problems

	associated with sugar maple decline and beech bark disease, yet the ANF has responded to these problems with meaningful efforts in research and management.
5.1.d. Conditions for each timber sale are clearly established. Forest owners or managers use a legal timber sale contract and a map of the timber sale area.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Timber Sale Contracts were well developed, executed, and controlled. The USDA Forest Service has a "Timber Sale Contract" template that was observed in full use by the ANF. The contract clearly establishes the condition for each timber sale. Additionally, a "Pre-Work Conference" is held by the ANF with the timber purchaser to discuss, in the field, various items and issues related to the work.
NOTES: None	
5.2 Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	
Criterion Level Remarks: Minor non-conformance. Diverse forest products are produced on the ANF which are sold to the highest bidder, as per federal law. Most sales are made to local vendors, so local economies are positively affected by forest management activities.	
5.2.a. Preference is given to local, financially competitive facilities for value-added processing and manufacturing.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> USDA Forest Service timber and recreation concessions are sold to the highest bidder, as per federal law. By nature of the forestry and forest products sector, the majority of processing and manufacturing opportunities are awarded to local and regional organizations.
5.2.b. Markets are explored and used when available for common but less-used species (e.g., hemlock, mountain laurel, sourwood, rhododendron, black gum, dogwood), grades of lumber (e.g., pulp), or an expanded diversity of forest products.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The ANF does not explore markets, per se, but offers a wide variety of forest products (common but less used species such as hemlock, low grade material including pulp) for sale via a bid process.
5.2.c. Technical and financial specifications are developed for the sale of forest products to local processors when it is consistent with the objectives of the management plan and federal and state laws.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The ANF sells stumpage to the highest bidder. As stated above, due to the nature of the forest products industry, sales of forest products are generally awarded to local businesses.
5.2.d. When non-timber products are harvested, the management and use of those products are incorporated into the management strategy (See Appendix A).	Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Harvest of NTFPs is not seen as a regular or important part of activities undertaken on the ANF, with only infrequent, sporadic harvesting of leeks and club moss/ground pine (wreaths). However slight, harvest and use of NTFPs does occur and is not incorporated into the management strategy (see CAR 3/06).
NOTES: CAR 3/06: ANF shall develop and implement a plan to manage and monitor abundance, regeneration, and habitat conditions of NTFPs including the maintenance of records for the yield of harvested NTFPs. (Indicators 5.2.d, 7.1.b.1, 8.2.a.2, 8.2.b.2)	
5.3 Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	

Criterion Level Remarks: Conformance. The ANF demonstrated high performance in tree harvesting and utilization, including the application of consistent, high quality harvesting practices that have resulted in low levels of damage to other forest resources.	
5.3.a. Felling, skidding/yarding, bucking, sorting, and handling are carried out in a way that maximizes log scale and grade.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Timber is sold on a flat rate bid by species and product on a lump sum basis. Utilization, then, becomes the responsibility of the purchaser.</p> <p>Felling, skidding/yarding, bucking, sorting, and handling were all observed to be carried out in a way that maximizes log scale and grade. A wide variety of jobs were examined for felling, skidding, and landing procedures and effects. Tree stumps were cut low to the ground. Merchantable trees were processed into tree and log lengths and effectively felled and skidded to a landing. Landings were generally clean; although some had residual stem sections from processing of logs to optimize scale and grade. These sections are made available to the public as firewood. On one active logging job, sawlogs were observed to be sorted according to grade. Most timber is bucked for grade and sorted as such.</p> <p>The USDA Forest Service clearly describes utilization standards - based on the timber sale contract - in documents ranging from guided discussion in the pre-work conference between the purchaser and the ANF, to specifics in a table on "Utilization Standards" presented in the "Forest-Wide Design Criteria", under the PLRMP section "Forest Products/Special Forest Products" (p. III-19 through III-20).</p>
5.3.b. Harvest is implemented in a way that protects the integrity of the residual stand. Provisions ensuring that residual damage does not exceed regional averages based on slope percent, size and pre-existing conditions of timber, species and time of year are included in operational contracts.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Harvested stands were observed to have little to no residual damage from felling and skidding, indicating effective felling technique (e.g., directional felling) and sound skid trail layout and skidder use (log and tree length stem sections). Provisions regarding residual damage are well described in operational (prescription, Timber Sale Contract), tactical, and strategic PLRMP and DEIS documents (see findings associated with Criterion 5.3.a).</p>
5.3.c. Woody debris is retained on site to provide biological capital for the cycling of nutrients and the maintenance of habitat (see indicator 6.3.c.). Woody debris in excess of this amount is sold when markets exist, and is distributed throughout the forest when they do not.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Timber harvest operations were observed to provide a balance of high commodity utilization balanced with retention of woody debris for natural processes related to nutrient cycling and wildlife habitat (also see findings associated with Criterion 6.3.c).</p>
NOTES: None	
5.4 Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	
Criterion Level Remarks: Conformance. Forest management on the ANF is a federal endeavor, with forest	

<p>management and use activities guided by a wide variety of laws and regulations that has led to strengthened and diversified local economies. The ANF does not depend on a single forest product, with efforts made to balance timber production with recreation, while maintaining high quality water, and air and soil resources and maintaining or enhancing healthy forest and related natural ecosystems.</p>	
<p>5.4.a. Management diversifies forest uses and products, while maintaining forest composition, structures, and functions.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF is bound by pertinent federal legislation to balance a diversity of forest uses and products, including recreation, hunting, and fishing (see findings associated with Criterion 2.1.a). All of these forest uses and products were observed in production and use on the ANF. Additionally, monitoring reports and stakeholder feedback support the notion of satisfactory production and use, and that forest composition, structures, and functions (healthy ecosystems) were viably produced by management of the ANF.</p> <p>Sustained yield of timber from the Forest is based on setting harvest levels at or below the ecological capacity of the forest (AAC or ASQ; see findings associated with Criterion 5.6) and regulation of the forest, or more specifically, the balancing of age classes. While the ANF has a sound plan for achieving forest regulation (see findings associated with Criterion 5.6), the current unbalanced state of the Forest, coupled with a recent history of problems in conducting timber harvest aimed at regeneration to create new age classes of forest, could lead to problems in achieving sustained, even-flow yield of timber products in the long-term (OBS 3/06). The ANF has worked diligently in the past and has accomplished much of the program given current funding levels. The ANF continues to work actively with the Region to generate additional funds for the timber program, as related to forest regulation.</p>
<p>5.4.b. Forest owners or managers reinvest in the local economy and the community through active civic engagement and ongoing capital investment.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF does reinvest in the local economy and the community through active civic engagement and ongoing capital investment. Civic engagement was described in findings associated with Criterion 4.1.f. Ongoing capital investments feature a well maintained forest road system (1,270 miles); trails (hiking—201 miles, cross-country skiing—53 miles, interpretative—18 miles, all-terrain—106 miles, snowmobile—366 miles), and campgrounds (16 with over 600 sites), and also include various office buildings and related facilities.</p> <p>A key investment by the ANF to the local economy is the annual payments made in lieu of taxes (“Secure Rural Schools and Community Self-Determination Act of 2000”, see findings associated with Criterion 1.2.a).</p>
<p>NOTES: OBS 3/06: Since a large set of forest values and services, including important contributions to economies of local communities, can be significantly influenced by timber harvest, the ANF could continue to strive to meet ASQ and better regulate the forest in terms of the balance of age classes. (Indicator 5.4.a)</p>	

5.5 Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.

Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required.

Criterion Level Remarks: Conformance. Forest management operations include a recognition, maintenance and enhancement of forest service and resources, such as watershed and fisheries.

	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Documented evidence of the ANF's management efforts to maintain and enhance forest ecosystem services and resources such as watersheds and fisheries indicated that there were no gaps associated with this Criterion. Also, the ANF is bound by law to care for these services and resources, and appeared to have the staff and resources dedicated to those tasks.</p> <p>One issue discussed at length was oil and gas well development and management. Over 90% of subsurface oil and gas resources are privately owned. Over the past decade, the rate of new well drilling has increased significantly. While the 1986 Land and Resource Management Plan included strategies for working with subsurface rights owners, this area of forest use may lead to future imbalance of forest and natural resource use caused by extensive and intensive oil and gas development.</p>
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NOTES: None

5.6 The rate of harvest of forest products shall not exceed levels that can be permanently sustained.

Criterion Level Remarks: Conformance. The rate of forest product harvest has been below AAC.

<p>5.6.a. The sustainability of harvest levels is based on documented data on growth and regeneration, site index models, and classification of soils, appropriate to the scale and intensity of the operation.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Harvest levels have been based on documented data on growth and regeneration. Soil-site information is not of sufficient quality to use in calculation of harvest levels.</p> <p>The ANF has harvested timber at a rate far less than the AAC defined as "annual allowable sale quantity" (ASQ) by the ANF plan. ASQ was calculated using standard USDA Forest Service protocols for inventory and analysis. In 1995, the ANF adjusted their 10-year harvest targets as a result of a harvest capability report that evaluated 13 factors affecting the ANF's ability to achieve the ASQ. As a result, the estimated maximum targeted harvest level was significantly reduced to adjust for effects of white-tailed deer on regeneration, beech bark disease, and other forest health problems and situations. The actual ASQ, calculated for the entire planning horizon, was not changed or formally amended in the 1986 Forest Plan. The modification was a tactical adjustment to reflect a revised estimate for annual harvest levels specific to a 10-year period. Even with this modification, annual cut of timber has remained far below the reduced targeted harvest levels.</p>
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<p>5.6.b. After an age-class distribution (see Glossary) commensurate with long-term sustainability is achieved (See Appendix D), records of growth and harvest show that growth rates meet or exceed harvest rates over a period of no more than 10 years. Forest owners or managers ensure that, after harvest the size-class distribution is maintained.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>A self-defined problem does exist on the ANF with regard to an unbalanced age-class distribution across the Forest. From the DEIS (p. 1-8):</p> <ul style="list-style-type: none"> - almost all of the ANF is currently even-aged second growth - with regard to age class distribution, the ANF is presently comprised primarily of stands of intermediate ages - the majority of the ANF is older than 80 years (60%), (with) more than half (57%) of the ANF falling within a 30-year class (81-110 age class) - 8% of the ANF is in the youngest age class (0-20 years old) <p>The ANF does have a plan to balance age classes that includes working through a number of natural and anthropic factors, including overbrowsing by deer that limits opportunities for regeneration harvests, and natural disturbances that have necessitated salvage operations rather than regeneration.</p>
<p>5.6.c. Exceptions to the constraint that growth rates meet or exceed harvest rates within a 10-year period may be granted to forest owners or managers whose periodic re-entry cycle is longer than 10 years. In such cases, allowable harvest is determined by examining the volume of re-growth and harvest since the previous harvest and the owner or manager's commitment to allow an equivalent amount of re-growth before additional harvests.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Harvest rates have not exceeded growth rates, and there is no indication that they will in the foreseeable future. The ANF is fully committed to maintaining harvest levels that do not exceed net growth.</p>
<p>5.6.d. Species selection meets the economic goals and objectives of the forest owner or manager, while maintaining or improving the ecological composition, structures, and functions of the forest.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF strives to maintain diverse species forest composition. No one species is preferentially harvested, nor is only a single species promoted in regeneration. Ecological composition, structure, and function are being diversified with forest management practices, which will promote the overall health and resiliency of the ANF.</p>
<p>NOTES: None</p>	

PRINCIPLE 6. ENVIRONMENTAL IMPACT- 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.

Applicability Note to Principle 6: Owners or managers of small forests that practice low-intensity forestry may meet this requirement with brief, informal assessments. More extensive and detailed assessments (e.g., professionally prepared assessments) are expected by owners and managers of large forests and/or those who practice more intensive forestry (see Glossary) management.

<u>Criteria and Indicators</u>	<u>Findings</u>
<p>6.1 Assessment 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 shall include landscape level considerations as well as the impacts</p>	

of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.

Criterion Level Remarks: Minor non-conformance. **Non-conformances were associated only with Additional Considerations and therefore did not result in CARs.** The ANF conducts comprehensive assessments of current and historic physical and biological forest resources at stand and landscape levels for evaluation of environmental impacts accruing from proposed management activities. These assessments are conducted prior to commencement of site- and landscape-disturbing activities and used to direct the location, extent, and execution of such activities.

<p>6.1.a. Using available scientific information and local expertise, an assessment of current conditions is completed that includes: (1) ecological processes, such as disturbance regimes; (2) vulnerable, imperiled, and critically imperiled plant community types (G1-G3, N1-N3, and S1-S3, according to NatureServe and natural heritage databases); (3) common plants, animals, and their habitats; (4) imperiled (e.g., butternut), threatened, and endangered species and their habitats (according to state and federal statutory listings); as well as G1-G3, N1-N3, and S1-S3 species and their habitats (according to NatureServe and natural heritage databases); (5) water resources; and (6) soil resources. (see also subcriteria 7.1.a. and 7.1.b.)</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Whenever a management activity (Project) is contemplated, a rigorous process, mandated by the 1976 NFMA and the 1969 NEPA, is launched requiring production and publication of an EIS, or Environmental Assessment (EA) which evaluate potential and actual social and environmental impacts of planned forest management activities. In this manner, as different projects with proposed management activities come up for mandatory review, those portions of the forest subject to active timber management receive a comprehensive assessment of current conditions.</p> <p>Areas not liable for active management, such as the old-growth forest within the Tionesta Scenic and Research Natural Areas, are described in detail (including elements required by this criterion) as collateral information. This process includes an assessment of current and historical physical and biological resources. The “Draft Environmental Impact Statement for Martin Run” was evaluated as an example of the adequacy of assessment of current conditions. The third chapter, “Affected Environment and Environmental Consequences” was an exemplary example of a thorough, competent, comprehensive, and professional evaluation of current and historical conditions and was based on comprehensive review of existing literature and local expertise. Included in the assessment were: description of soil and water resources, cumulative effects on watersheds, and water quality, plant communities and plant associations as affected by ecological processes and human activities, historical disturbance regimes, natural disturbance factors, introduced and natural insects and diseases, biological diversity including genetic, and identification of federally-listed RT&E species and regionally-sensitive species.</p>
<p>6.1.b. Using available scientific information and local expertise, the current ecological conditions are compared to the historical conditions within a landscape context by using the baseline factors identified in 6.1.a.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Within the EIS or EA mandated prior to execution of management activities, current ecological conditions are compared to historical (i.e., natural and human-induced) conditions within a landscape context: such comparisons include factors identified in Criterion 6.1.a. as well as others.</p>
<p>6.1.c. Prior to the commencement of management</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

<p>activities, potential short-term environmental impacts and their cumulative effects (see Glossary) are evaluated.</p>	<p>Within the EIS or EA mandated prior to execution of management activities, potential short- and long-term environmental impacts and cumulative effects are evaluated comprehensively.</p>
<p>6.1.d. Using assessments derived from the above information, options are developed and implemented to maintain and/or restore the long-term ecological functions of the forest (see also 7.1.c).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Within the EIS or EA mandated prior to execution of management activities, various management options (alternatives) are posed. Each option is evaluated comprehensively for impacts on long-term ecological functions of the forest (categorized by soil, water, botanical, and wildlife resources) and for each action that would maintain/restore long-term ecological functions: the option chosen is executed in a manner that protects long-term ecological functions.</p> <p>Assessments by the ANF, as expressed in the documentation described above, include evaluation of regeneration, carbon cycling (sequestration) in the form of coarse woody debris, soil compaction, filtration, and fertility, hydrology, sedimentation and stream flow mechanics, maintenance of continuous overstory canopy, maintenance of biodiversity, stand succession and distribution of successional stages, and vertical and horizontal diversity of vegetation. In sum, these assessments form a comprehensive assessment of, and form the basis for, maintenance and implementation of long-term forest ecological functions.</p> <p>ANF uses information developed through environmental assessments to designate MAs with the expressed purpose of matching objectives and activities to specific geographic areas based on ecological characteristics and sensitivities. The ANF has selected sites for MA 3 (timber management) on relatively flat lands, avoiding steep, dissected lands (which are in MA categories that de-emphasize or prohibit timber harvest) with attendant potential problems regarding water quality and fishery problems (spawning in headwaters, amphibian habitat).</p>
<p>6.1.e. Monitoring the establishment of invasive species is conducted throughout the forest with special emphasis on disturbed areas and areas where exotic species are known to exist.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Areas where invasive species are known to occur, or are likely sites of spread (e.g., roadsides, rights-of-way) are monitored annually by crews with special training in identification to monitor occurrence and spread of invasive plant species. Invasive fauna (e.g., brown-headed cowbird, European starling) monitoring is conducted only irregularly as part of research.</p>
<p>AC 6.1.1. Managers of National Forests use available science and information to prepare a written description of the historic range of variability of forest conditions and disturbance regimes.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Within EIS or EA mandated prior to execution of management activities, managers of the ANF use available science (literature) and consultation with</p>

<p><i>For example:</i></p> <ul style="list-style-type: none"> ▪ <i>Description of the intensity, distribution, frequency, size, resulting landscape patterns, and residual stand structures of the major disturbance regimes.</i> ▪ <i>Description of the historic range of variability of estimated composition of forest cover types, typical age class distribution, and estimated stand structures.</i> 	<p>experts to provide a written description of historic forest conditions and disturbance regimes. There is virtually no information on pre-European settlement forest conditions for the ANF. Managers describe conditions on the Tionesta Scenic and Research Natural Areas as typical of old-growth, which may be interpreted as description of historic conditions. It would be impossible, however, to determine range and variability of such conditions.</p>
<p>AC 6.1.2. The description of the historic range of variability of forest conditions is made available for public review and comment prior to its use in management decisions.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>As required by law, the ANF provides its description of the historic range of variability (such as it can) available for public review and comment prior to its use in management decisions.</p>
<p>AC 6.1.3. Current forest conditions are compared at the landscape scale with the historic range of variability of forest conditions. Measures of current forest condition include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Area, composition (e.g., species and age class distribution) and spatial representation of ecological types including old growth and late seral forests; ▪ Composition and distribution of habitat-related structural elements (e.g. snags, den trees, mast trees, coarse woody debris, thermal and hiding cover). 	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Within EIS or EA mandated prior to execution of management activities, managers of the ANF use available science (literature) and consultation with experts to compare current forest conditions with historic forest conditions, including spatial representation of successional stages such as old-growth and late seral forest.</p> <p>Such comparisons do not include historic or current landscape position or arrangement of forest conditions. Descriptions provided in above-mentioned statements include composition and distribution of structural elements such as snags, den trees, mast trees, coarse woody debris, (and comparisons between managed second growth stands and old-growth stands) but do not compare them with "historic" stands as such records are not available. Thermal and hiding cover are not described nor compared.</p>
<p>AC 6.1.4. The effects of management activities on neighboring lands are included in the scope of environmental impact assessments on National Forests.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Effects of management activities on neighboring lands are included in the scope of findings of EAs on National Forests. Neighboring landowners are invited to participate in projects. The ANF considers the effects of treatments in the cumulative effects section of EA's and EIS's.</p>
<p>NOTES: None</p>	
<p>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</p>	
<p>Criterion Level Remarks: Conformance. The ANF provides comprehensive and exemplary safeguards for protection of RT&E species and their habitats and establishes conservation zones for their protection when such zones are deemed essential. Evaluation for potential or actual impacts on these species by proposed management activities is comprehensive and exhaustive. Inappropriate hunting, fishing, trapping, and collecting are controlled where necessary.</p>	
<p>6.2.a. If state or federal listings and species databases</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

<p>indicate the likely presence of a rare, threatened and endangered species or plant community type, either a survey is conducted prior to management activities being carried out (to verify the species' presence or absence) or the forest owner or manager manages as though the species were present. If an applicable species and plant community type is determined to be present, its location is reported to the manager of the applicable database.</p>	<p>Prior to commencement of management activities, an evaluation is made to determine whether RT&E or sensitive plant or animal species (or plant community type(s) are present, potentially present, or likely to be impacted by the proposed activities. This evaluation includes querying local and regional data-bases (Pennsylvania Natural Diversity Index, a natural heritage database), searches by USDA Forest Service staff, and assessments by local and regional experts for presence or potential presence of such species or communities. If the species or communities are thought to be present, potentially present, or if suit is brought to require such evaluation, USDA Forest Service employees complete a Biological Assessment of risks to such species or communities. These assessments are prepared by, or under the direction of, a federal agency to determine whether a proposed action is likely to: (1) adversely affect listed species or designated critical habitat; (2) jeopardize the continued existence of species proposed for listing; or (3) adversely modify proposed critical habitat. The assessment is, in turn, reviewed by the U.S. Fish and Wildlife Service, which files a Biological Opinion regarding impacts of planned management action. Additionally, the ANF conducts a Biological Evaluation which is a description of habitat for plant and animal species on the Regional Foresters' Sensitive Species List that includes analysis of potential impacts associated with planned management activities. Location(s) of actual or potential occurrences of RT&E or sensitive species or communities, or Regional Foresters' Sensitive Species, are maintained by the ANF as well as being reported to the Pennsylvania Natural Diversity Index.</p>
<p>6.2.b. When a rare, threatened or endangered species or plant community type is present or assumed to be present, the necessary modifications are made in both the management plan and its implementation. Management activities are compatible with the maintenance, improvement, or restoration (see Glossary) of the species and its habitat.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If a RT&E species or plant community type, or Regional Forester's Sensitive Species is present or assumed present as determined by the Biological Assessment and/or Biological Evaluation, the Assessment is reviewed by the U.S. Fish and Wildlife Service, which files a Biological Opinion regarding impacts of planned management action. Biological Assessments may also be requested by non-interested third parties regarding potential impacts of proposed management activities upon RT&E or sensitive species, or plant community types. Biological Opinions may include requirements for mitigation or alteration of management activities and are binding, pending resolution of (any) appeals by the USDA Forest Service or other parties. The ANF then conducts management activities compatible with protection, maintenance, improvement, or restoration of species and their habitats.</p>
<p>6.2.c. Conservation zones are created and/or</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

<p>maintained for existing rare, threatened or endangered species and plant community types to enhance the viability of populations and their habitats, including their connectivity within the landscape.</p>	<p>Stand and landscape level evaluations are made of potential effects on habitats of existing RT&E species and plant communities and Regional Forester's Sensitive Species. If protection zones (i.e., conservation zones) are deemed necessary to protect habitats for these species, size and location of such zones are identified and protected. Connectivity within the landscape of such zones is evaluated and protection is afforded at this level if deemed necessary.</p>
<p>6.2.d. When rare, threatened or endangered species or plant community types are present or assumed to be present, control of hunting, fishing, trapping and collecting is adequate to protect species and/or plant communities.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>None of currently identified RT&E or sensitive species or plant communities, or Regional Forester's Sensitive Species is hunted, fished, or trapped. Collecting of such species (e.g., timber rattlesnake) is acceptable only if covered by permits issued by regulating agencies (Pennsylvania Fish and Boat Commission in the case of the timber rattlesnake).</p>
<p>6.2. DOD/DOE 1. Forest areas that are slated for resource extraction or development are surveyed for Rare species and Rare plant community types (see Glossary) where survey protocols exist. Surveys are kept up to date.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Federal mandates require that National Forests file EISs for areas slated for resource extraction. These impact statements contain information on RT&E species. Prior to management activities, the ANF sends teams of biologists to survey sites for habitats known to be important for RT&E species. Additionally, managers query the Pennsylvania Natural Diversity Index for known occurrences of these species.</p>
<p>6.2. DOD/DOE 2. A landscape-level conservation and restoration analysis is completed.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF did perform analyses for landscape-level conservation analyses, e.g., in the setting of management areas in association with the 1986 Plan. Additionally, the ANF has focused on landscape-level restoration of late-successional forest elements via a large-scale landscape corridor in three of the four alternatives in the 2006 PLRMP (OBS 4/06).</p>
<p>6.2. DOD/DOE 3. Where the regional protected areas system, late-successional and old-growth forests, and/or habitat for recovering Rare species or plant community types are inadequately represented to ensure their long-term viability across the landscape, management for these attributes is given a priority.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Managers for the ANF have determined that late-successional and old-growth forests and habitat for RT&E species are well-represented and take proactive steps to afford long-term viability across the landscape, prioritizing management for these species and habitats.</p>
<p>AC 6.2.1. A comprehensive list of the species of interest and species of concern (e.g., species with notable conservation need) is maintained for each National Forest. Managers demonstrate through policies and actions that said species are duly considered in the course of forest management.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Lists of federally-listed RT&E species, Pennsylvania species of interest and special concern, and Regional Forester's Sensitive Species are identified and maintained. Habitats for such species are identified and protected, and policies embraced to protect these species and their habitats.</p>

NOTES: **OBS 4/06:** ANF could implement one of the landscape corridor proposals in the 2006 PLRMP as a

landscape-level conservation and restoration analysis, particularly in association with late-successional forest ecosystems. (Indicator 6.2. DOD/DOE 2.)

6.3 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.**

APPLICABILITY TO OLD GROWTH:

Due to the scarcity of old-growth forests in the conterminous states, they are normally designated as High Conservation Value Forests (see Principle 9).

Certified old-growth forests not designated as High Conservation Value Forest are managed to maintain or recruit: (1) the existing abundance of old-growth trees, and (2) the landscape and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes. Limited timber harvest is permissible provided these characteristics are retained or enhanced.

Applicability Note to Criterion 6.3: Old-growth forests or stands (see glossary) do not include areas that have developed the following characteristics through management for the production of timber products: a complex canopy structure, large amounts of coarse woody debris, and an open understory with late seral plant species present. While a few old-growth forests are present in the region, the majority of old-growth areas are stands less than 500 acres. Due to the size and the divergence of forest characteristics within the Appalachia Region, it is not possible to provide a singular definition of old-growth stands or forests.

Characteristics of old-growth forests and stands typically include a complex canopy structure, large amounts of coarse woody debris, and an open understory with late seral plant species present. Additional characteristics have been identified by Martin (1992).

Criterion Level Remarks: Conformance. Management activities proposed and implemented by the ANF are conducted in a manner which ensures forest regeneration and succession representative of natural cycles and perpetuates diversity of plant and animal species and stand structure, excepting that maximum allowable size of openings created by timber harvest is one or more orders of magnitude less than that created by natural disturbance. Forest management, including use of silvicultural techniques to preserve and enhance diversity of tree, shrub, and herbaceous species, reservation of special habitats, special habitat components, preservation of existing old-growth and management to produce additional old-growth characteristics maintain and enhance genetic, species and ecosystem diversity. Management includes development and continuity of all successional stages, attempts to mitigate truncation of species richness and vertical structure caused by white-tailed deer browsing, and distribution of coarse woody debris (standing and down) to enhance natural fertility and carbon cycling. Management policy precludes creation of large (> 40 acre) patches of early succession habitat occurring naturally from wind throw.

6.3.a. Forest regeneration and succession

6.3.a.1. Forest owners or managers use the following information to make management decisions: landscape patterns (e.g., land use/land cover, non-forest uses, habitat types); ecological characteristics of adjacent forested stands (e.g., age, productivity, health); species' requirements; and frequency, distribution, and intensity of natural disturbances.

Applicability Note to Indicator 6.3.a.1: This indicator may have limited applicability for managers of small and mid-sized forest properties because of their limited ability to coordinate their activities with other owners within the landscape, or to significantly maintain and/or improve landscape-scale vegetative patterns.

Conformance with Indicator: Yes No N/A

Prior to making and implementing management decisions, personnel from the ANF make an assessment of physical and biological environments of affected stands, including historical vegetative composition and structure, historical distribution and intensity of natural and human-induced disturbance(s), and landscape patterns of both among included stands. Included are species' (plant and animals) habitat and other requirements, and ecological characteristics (i.e., vegetative species composition, aspect and slope positions, hydrology and stream and riparian zone loci, and sensitivity to soil and water erosion) of adjacent forested stands.

<p>6.3.a.2. Forest owners or managers maintain or restore portions of the forest to the range and distribution of age classes of trees that would result from processes that occurred naturally on the site.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Major natural processes and disturbance factors on the ANF include regeneration, succession, competition, predation/herbivory, carbon cycling, wind throw, ice storms, and insect defoliations. These conditions produce a range and random distribution of age classes of trees, under both even-aged and all-aged conditions. Current practices on the ANF, including even-aged and uneven-aged management and maintenance, protection, and enhancement of old-growth conditions, produce a range and distribution of age classes of trees that would result from natural processes.</p>
<p>6.3.a.3. Silvicultural practices provide disturbances and generate stand conditions that result in a successional phase that would occur naturally on the site.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Silvicultural practices—crop tree release, pre-commercial and commercial thinning, shelterwood seed cuts, final harvest removals with retention of residuals designed to maintain den and snag trees, species and genetic diversity of trees, avoidance/prohibition of harvest in areas of known old-growth, and other treatments designed to speed creation of snags and increase distribution and amount of down coarse woody debris (logs) and produce old-growth-like conditions—produce the full range of successional stages likely to occur naturally across the landscape.</p>
<p>6.3.a.4. Natural regeneration is used unless artificial regeneration is required for establishing extirpated species or enhancing naturally occurring species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Natural regeneration is utilized to regenerate stands unless seed source or survival of progeny from existing parent trees is lost, eliminated, or jeopardized. Such cases are rare, but include planting and protecting (tubing) of species sensitive to deer browsing (e.g., northern red oak).</p>
<p>6.3.a.5. The techniques used for regeneration are justified for each harvest unit and/or stand.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Regeneration characteristics of each species desired for regeneration on individual stands are reviewed and techniques most likely to result in successful regeneration of such species (i.e., single tree and group selection, fencing, crop tree, fertilization, herbicide application, shelterwood seed cuts, fire, final harvest with residuals) are utilized.</p>
<p>6.3.a.6. When uneven age silvicultural techniques are used (e.g., individual tree selection or group selection), canopy openings are less than 2.5 acres.</p> <p><i>Applicability Note to Indicator 6.3.a.6: Uneven age silvicultural techniques are used when they maintain or enhance the overall species richness and biologic diversity, regenerate shade-tolerant or intermediate-tolerant species, and/or provide small canopy openings to regenerate shade-intolerant and intermediate species. Uneven-age techniques are generally used to</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Maximum canopy opening size allowed for uneven-age silvicultural techniques (e.g., group selection, patch selection, single-tree selection) is less than 2.5 acres.</p>

<i>develop forests with at least three age classes.</i>	
6.3.a.7. Uneven age silviculture is employed to prevent high-grading and/or diameter limit cutting.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>High-grading and diameter limit cutting are expressly prohibited on the ANF.</p>
<p>6.3.a.8. When even-aged or two-aged management (e.g., seed tree, regular or irregular shelterwood), or deferment cutting (see Glossary) is employed, live trees and native vegetation are retained and opening sizes are created within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type (see Glossary), unless retention at a lower level is necessary for restoration or rehabilitation purposes. Harvest openings with no retention are limited to 10 acres.</p> <p><i>Applicability Note to Indicator 6.3.a.8: Even-age silviculture is used only where naturally occurring species are maintained or enhanced. Retention within harvest units can include riparian and streamside buffers and other special zones. In addition, desirable overstory and understory species may be retained outside of buffers or special zones while allowing for regeneration of shade-intolerant and intermediate species consistent with overall management principals. Where stands have been degraded, less retention can be used to improve both merchantable and non-merchantable attributes.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>When even-aged or two-aged management cutting is employed, live trees are retained as residuals to perpetuate diversity in the next regeneration cycle. As much as possible, rare and/or uncommon tree species are retained as residuals. Other native vegetation (i.e., shrubs and herbs) is retained, sometimes by protection from deer browsing with deer-proof fences. Openings of smaller size (≤ 40 acres) are created which simulates small scale disturbance, but USDA Forest Service policy, adhered to on the ANF, restricts the size of final harvest removal sites to ≤ 40 acres (CFR 219.27d).</p> <p>This policy prevents creation of opening sizes representative of local disturbance regimes which may open hundreds to thousands of acres in single swaths. However, the policy is assuaged somewhat by natural disturbance which operates independently of policy and tends to create openings of various sizes at varying frequencies. There are no harvests allowed with no retention of residual trees unless there are no residual trees before (salvage) harvest.</p>
<p>6.3.a. DOD/DOE 1. Late-successional and old-growth stands and forest areas of all sizes are identified. Forest management is conducted only to maintain or enhance their late successional and old-growth composition, structures, and functions.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> ▪ <i>Control and removal of exotic species is carried out.</i> ▪ <i>Prescribed fire may be used.</i> ▪ <i>Habitats of late-successional and Rare species may be created or enhanced.</i> 	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Late-successional and old-growth forest stands and areas of all sizes are identified. Protection of an identified late-successional stand from inadvertent harvesting seemed lacking, prompting questions concerning adequacy of monitoring management of such lands (see OBS 5/06 and findings associated with Criterion 6.4.a with regard to concern for late-successional forests).</p>
6.3.b. Genetic, species, and ecosystem diversity	
6.3.b.1. Forest owners or managers select trees for harvest, retention, and planting in a manner that maintains or enhances the productive capacity, genetic diversity, land quality, and species diversity of the residual stand.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The current situation on the ANF (high proportion of black cherry on some stands, high proportion of such stands identified as Allegheny Hardwood) resulted from multiple overstory removals subsequent to the 1880s that favored shade intolerants like black cherry and browsing preference by an increasingly overabundant deer herd (deer prefer species other than black cherry). Silvicultural practices (group/patch selection, single-tree selection) that feature shade tolerant species, such as hemlock and sugar maple, failed in the past due to</p>

	<p>elimination of advance regeneration on these sites by deer. Also, decades of overbrowsing by deer has nearly eliminated regeneration of less common species such as basswood, yellow poplar, black gum, white ash. The ANF has had to resort to fencing to get successful regeneration of tree species preferred by deer of common (red maple, birches) and less common (basswood, yellow poplar, black gum, white ash) species. Additionally, the ANF refrains from harvesting these uncommon species, preferring instead to leave them as residuals on final harvest sites to perpetuate the species and enhance the diversity of residual and succeeding stands. In some cases, the ANF has planted species and protected them with tubing (e.g., red oak, white pine) on sites where there is no advance regeneration.</p> <p>ANF field staff select trees for harvest and retention in a manner that would maintain and/or enhance productive capacity, genetic diversity, land quality, and species diversity of the residual stand were it not for the presence of interfering vegetation (i.e., ferns, grasses, and striped maple and American beech seedlings and saplings), and selective browsing by an overabundant white-tailed deer herd, both of which tend to promote dominance of the emerging overstory by striped maple and beech. Herbicides are used in some instances to reduce the impact of interfering vegetation and a combination of fencing and promotion of increased harvest of white-tailed deer is used to reduce the influence of deer on productive capacity, genetic diversity, land quality, and species diversity residual stands.</p>
<p>6.3.b.2. A diversity of habitats for native species is protected, maintained, and/or enhanced.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Prior to layout and execution of planned timber harvests, wildlife ecologists/biologists conduct on-site evaluation and locations of sensitive wildlife habitat components (e.g., conifer concentrations, den and mast trees, snags), refugia (e.g., monolithic rock groupings, riparian zones, bogs, fens, vernal pools), and other critical elements (e.g., stick nests, heron rookeries) and mark such loci/trees, components and elements for retention, protection and buffering from timber harvest and harvest operations (i.e., skidding, hauling). Additionally, down coarse woody debris (i.e., lopped tree tops, butt and cull logs) is distributed across harvest sites. Vertical and horizontal structural complexity is enhanced and maintained by practices (e.g., thinning, fencing, uneven-aged management) and by arrangement in space and time over landscapes, including protection and provision of continuous canopy closure in the landscape corridor, which connects old-growth and maturing timber patches with corridors of continuous overstory canopy closure.</p>

<p>6.3.b.3. Locally adapted seed (e.g., seedlings available from the state Department of Natural Resources) of known provenance is used for artificial regeneration.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Artificial regeneration is practiced only as a last resort when local seed sources are eliminated from sites and in these few instances planted seedlings are used instead, and these seedlings are of known provenance adapted for local conditions from regional nurseries.</p>
<p>6.3.b.4. Silvicultural systems and techniques are used that lower the natural vulnerability of stands to existing and potentially threatening perturbations, such as pest outbreaks and windthrow.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Clumps of residual trees now are favored over individual residual trees retained after timber harvest to reduce wind throw loss potential. When white pine is planted as seedlings to increase conifer component in stands, it is under planted in existing pole and sawtimber stands rather than in the open to reduce the incidence of weevil infestation and damage. Monocultures are avoided to reduce the potential for insect infestations (e.g., cherry scallop shell moth) and pathogen susceptibility (e.g., black knot).</p>
<p>6.3.b. DOD/DOE 1. Management units and sites that function as ecological refugia (see Glossary) and relict areas (see Glossary), either formally or due to the historical exclusion of management activities, are identified and continue to be managed primarily as such. Forest management is limited to actions needed to support the composition, structures, and functions of the refugium or relict area.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Managers ensure that management units and sites that function as ecological refugia and relict areas are identified and continue to be managed primarily as such. Forest management is limited to actions needed to support the composition structures, and functions of the refugia or relict area.</p>
<p>AC 6.3.b.1. Connectivity between wildlife habitats and associated landscape features (such as HCVF's) is considered while implementing even-aged timber management on National Forests.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF has established a landscape corridor system designed to connect areas of old-growth, or areas tending to old-growth, with even-aged managed stands. Stands within the landscape corridor in Management Areas (MAs) designated for driving stands to old-growth like properties are identified as tending to old-growth and are to be maintained intact. On one site inside the corridor visited by the team some large and old eastern hemlock and yellow poplar had been harvested.</p>
<p>AC 6.3.b.2. Forest management practices maintain or restore aquatic ecosystems and habitat features, wetlands, and forested riparian areas (including springs, seeps, fens, and vernal pools).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Forest management practices maintain or restore aquatic ecosystems and habitat features, wetlands, and forested riparian areas (including springs, seeps, fens, and vernal pools). The ANF has designated MA 3.0 sites (where timber production is emphasized) primarily on flatter sites with gentle slopes, avoiding heavily dissected lands with frequent and multiple riparian zones. The ANF diligently follows Pennsylvania BMPs for protection of wetlands, riparian zones, vernal pools, springs, seeps, and fens. Riparian zones and boundaries of such waterways are identified, marked with paint, and protected. Vehicular traffic is confined to bridges and other approved crossings.</p>
<p>6.3.c. Natural cycles that affect the productivity of the forest ecosystem.</p>	

<p>6.3.c.1. Coarse woody debris is maintained in the form of large fallen trees, large logs, and snags of various sizes.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Down coarse woody debris (e.g., lopped tree tops, butt and cull logs) is distributed across harvest sites. Den, snag, and cull trees of multiple species are left as residuals on harvest sites to provide a continuous succession of snags of various species and sizes within sites.</p>
<p>6.3.c.2. Post-harvest management activities maintain soil fertility, structures, and functions.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Slash is randomly distributed across harvest areas as well as deposited in skid trails where rutting is occurring (or there is a potential for rutting) to prevent soil compaction. Slash is also deposited on the downside of skid trails on steep slopes to prevent soil erosion. Where herbicide application is utilized post-harvest to reduce interfering plants, rubber-tired vehicles are used in applications to reduce soil compaction and retain soil structure.</p>
<p>6.3.c.3. Prescriptions for salvage harvests balance ecological and economic considerations.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF adequately balances ecological and economic considerations in salvage harvests. Down coarse woody debris is retained across salvage sites. Where safety and OSHA regulations permit, standing den and snag trees are retained. Live residuals are left standing to provide diversity in the seed source for the next stand. Nutrient cycling is enhanced by leaving coarse woody debris on the ground. Soil and water protection are provided by adherence to established policy regulating number and distribution of skid trails, prohibition of skidding when rutting/soil compaction is an issue, and prohibition of stream crossings without bridges. Existing advance regeneration is protected by minimizing number of skid trails and placement of such.</p>
<p>6.3.c.4. Forest owners or managers modify soil management techniques that are designed to ensure degradation of soil quality does not occur.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Skid trails are placed across, rather than down, slopes and are water barred to prevent compaction and movement of soil and water. Slash is placed in skid trails where rutting is occurring or may occur. Harvest and skidding operations are halted when wet, muddy conditions prevail that would lead to rutting and movement of soil and water. Site preparation activities are limited to laying out skid trails, corduroying small streams, and constructing and placing temporary bridges over streams. Rubber tired skidders with low pressure tires are used in skidding operations. Artificial fertilization is utilized when it promulgates diversity of regeneration. Existing advance regeneration (i.e., trees, shrubs, herbaceous vegetation) is protected/enhanced to promote natural early successional species regeneration and development of vertical structure.</p>
<p>6.3.c.5. Whole-tree harvesting and the burning of slash</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

and stumps are used only where it is ecologically justified, e.g., for pest control.

Whole-tree harvesting was evaluated on the ANF in the mid-1990s and it was determined that it would not be used to harvest trees (R. Durner, pers. comm.). Burning of piled or windrowed slash and stumps is not practiced. Prescribed fire is only used to control interfering plants in association with regeneration of oak, which was ecologically justified by the ANF in various planning and practice documents.

NOTES: None

6.4 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.

Applicability Notes:

When forest management activities (including timber harvest) create and maintain conditions that emulate an intact, mature forest or other successional phases that may be under-represented in the landscape, the management system that created those conditions may be used to maintain them, and the area may be considered as a representative sample for the purposes of meeting this criterion.

Ecologically viable representative samples are designated to serve one or more of three purposes: (1) to establish and/or maintain an ecological reference condition; (2) to create or maintain an under-represented ecological condition (e.g., successional phases of a forest type or natural community (see Glossary); and (3) to protect a feature that is sensitive, rare, or unique in the landscape. Areas serving the purposes of (1) and (2) may move across the landscape as under-represented conditions change, or may be fixed in area and managed to maintain the desired conditions. Areas serving the purposes of (3) are fixed in location.

For managed forest communities in the Northeast Appalachia region, ecologically mature or late-successional phases (not including old growth) are generally under-represented and would qualify as representative sample areas under purposes 1 and 2. Tolerant or long-lived mid-tolerant species (e.g., white pine.) typically dominate such stands. Depending on the site and forest community, characteristics may include a well-developed understory flora, relative stability of species composition, multi-layered canopies, stable or declining live timber volume, live trees in upper quartile of expected diameter growth for the site, presence of recognized late-successional indicator species (such as certain mosses, lichens or other epiphytes), and accumulation of large snags and large downed woody material. Examples of classification systems that include some of these concepts are: "Types of Old Growth Forests" as defined by Minnesota Department of Natural Resources (<http://www.dnr.state.mn.us/forests/oldgrowth/types.html>), and, Minnesota DNR Old-Growth Forest Policy - Goals and Results, at <http://www.dnr.state.mn.us/forests/oldgrowth/policy.html>.

For representative sample areas that may move across the landscape as conditions change (purposes 1 and 2), the length of time that an area is maintained as a representative area will vary with the rarity of the ecosystem type and specific ecological value to be conserved, the uniqueness of the represented condition, the rate at which areas with similar characteristics develop.

Examples of representative samples fixed in place and serving purpose 3 include relatively exceptional features such as fens, vernal pools, areas surrounding caves, and areas of special soils containing endemic plant species.

In most cases, intact old-growth (see Glossary) will qualify as representative sample under purpose 3 due to their rarity in the Appalachia region. Unentered old-growth stands (see Glossary) are also prime candidates for designation as representative sample areas under purpose 3. In both cases, the burden is on the landowner/manager to demonstrate that these areas should NOT qualify as representative sample areas under purpose 3. Other very old forests (over 150 years old) that do not meet the Lake States Standard's strict definition of "old growth" (e.g., there is some evidence of past harvesting) should also be considered as potential representative sample areas under purpose 3

Forests of all sizes may be conducive to protection of fixed features, such as rock outcrops and bogs. Medium sized and large forests may be more conducive to the maintenance of successional phases and disturbance patterns than small forests.

While public lands (see Glossary) are expected to bear primary responsibility for protecting representative samples of existing ecosystems, FSC certification of private lands can contribute to such protection.

Representative samples may be protected solely by the conditions of the certificate and/or through the use of conservation easements or other instruments of long-term protection.

Criterion Level Remarks: Conformance. Representative areas (~100,000 acres) of existing ecosystems and unique sites and habitats within the ANF landscape are identified, protected in their natural states, and recorded on maps appropriate to the scale and intensity of operations and uniqueness of affected resources.

6.4.a. Forest owners and managers protect and reserve ecologically viable representative areas that are appropriate to the scale and intensity of the operation.

Conformance with Indicator: Yes No N/A

Prior to implementation of management practices at the project level (hundreds to thousands of acres) ANF staff make comprehensive and thorough evaluation of areas representative of the broad variety of special habitats/ecosystems extant on the Forest. The Tionesta Scenic and Research Natural Areas, an ~4,000 acre old-growth remnant, is reserved from harvest and access is limited to reduce environmental impact of vehicular traffic. Identified sensitive habitats (e.g., monolithic rock aggregations, wetlands, vernal pools, swamps and other wetlands) are identified by boundary markings and timber harvest activities (i.e., logging, skidding, hauling, stream and river crossings) are prohibited within the boundaries. Riparian zones are identified, marked, and restricted for management activities. Establishment of two wilderness areas (Hickory Creek and Allegheny River Islands) and two National Recreation Areas maintain and protect areas of scenic beauty and unusual recreational opportunity. Timber harvest activities and vehicular access to these areas are prohibited unless they enhance management goals.

Late-successional forest areas (141 to 300 years old) are rare on the ANF and generally well conserved as they occur. Harvesting of large, old yellow poplar and eastern hemlock was observed in one late-successional forest area, suggesting need for oversight in, and coordination of, management of these areas which are designated for progression to late-successional and old-growth forest condition (**OBS 5/06**).

6.4.b. Where existing protected areas within the landscape are not of adequate size and configuration to serve as representative samples of commonly occurring forest types as defined above, owners or managers of mid-sized and large forests, whose properties are conducive to the establishment of such areas, designates ecologically viable areas to serve these purposes.

Conformance with Indicator: Yes No N/A

Using existing species composition, age structure and distribution of trees on the old-growth areas of the ANF (TNRA, TSA) as a model for characterization of ANF forestlands, scientists deduced that prior to initial timber harvests in the 1800's, the ANF was a predominantly northern hardwood forest, with shade tolerant sugar

<p><i>Applicability notes to 6.4.b.: When evaluating the need for representative sample areas, the assessment should consider the relative rarity and degree of protection of similar areas at the state-wide scale, or at the biophysical region scale (as defined by state Natural Heritage programs) if Natural Heritage program or other assessments suggest that there is significant variation in community or ecosystem types between biophysical regions. Where existing protected areas adequately represent commonly occurring forest types in the landscape, these areas may suffice as the representative samples and no representative sample need be established on the forest</i></p> <p><i>The owner or manager of a small forest may not be expected to designate representative sample(s) of commonly occurring forest types, except where there is an exceptional opportunity to contribute to an under-represented protected areas system. For small forests or low-intensity managed forests, this criterion is satisfied by meeting the standards of Criteria 6.2.</i></p> <p><i>The size and configuration of the representative areas depend on the:</i></p> <p><i>(1) extent of representation of their forest types within the landscape (less protection calls for more representative samples);</i></p> <p><i>(2) ecological importance of setting aside stands and tracts to other conservation efforts (a minimum size and ecological value is needed to make representative samples useful); and</i></p> <p><i>(3) intensity of forest management within the forest and across the landscape (a less intensively managed forest or landscape calls for less area of representative samples, and a more intensively managed forest or landscape calls for more).</i></p>	<p>maple, hemlock and American beech dominating an all-aged forest. Clearing and fires by native Americans resulted in temporary systems (transition oak) of alternating white pine and oak patches along river corridors.</p> <p>Repeated timber harvests beginning in the 1800s resulted in a change in species domination. Shade intolerant species such as black cherry, birch, and red maple were favored and dominated, resulting in creation of a new forest sub-type – Allegheny hardwood. Forest management practices and policies by the ANF have: 1) retained large contiguous patches of the previous northern hardwood type in the Tionesta Scenic and Research Natural Areas; 2) maintained the new forest type (Allegheny hardwood); and, 3) attempted to enhance, by planting and prescribed fire, the transition oak and oak-hickory types.</p>
<p>6.4.c. The size and arrangement and time scale of on-site representative sample areas are designated and justified using assessment methods and sources of up-to-date information described in 6.1.</p> <p><i>Note: Known protected off-ownership areas that are in proximity to the management unit may be used to meet the goal in the landscape.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Based on regional and local needs for forest resources, the ANF established a system of 11 MAs, each meeting different economic, ecological, and social needs. Apportioning lands to the different MAs was based on site conditions (i.e., aspect, slope, timber type and site condition, habitat type, uniqueness and amount of type, adaptability for recreation). Size and arrangement of MAs was based on evaluation of landscape characteristics, landscape and stand inspection, and input from regional experts.</p>
<p>6.4.d. Unless exceptional circumstances can be documented, known areas of intact old-growth forests are designated as representative sample areas under purpose 3. (See Applicability Note under 6.4 above) and are reviewed for designation as High Conservation Value Forests (HCVF- see also Applicability note under</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All known existing old-growth stands are identified and protected as such. The core old-growth areas, and other areas developing old-growth like characteristics, are linked together in a landscape corridor by</p>

<p>6.3). Known areas of unentered stands of old-growth are carefully reviewed, screened for uniqueness, and considered as potential representative sample areas prior to undertaking any active management within them (see Applicability Note under 6.4). Old growth stands not designated as either a HCVF or a representative sample area are, at a minimum, managed to maintain their old-growth structure, composition, and ecological functions under purpose 3.</p>	<p>interconnecting stands of continuous overstory canopy.</p>
<p>6.4.e. Forest owners and managers of public land determine the size and extent of representative sample areas through a transparent planning process that is accessible and responsive to the public.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The current proposed revision of the forest management plan, with four alternatives (Draft Documents for Forest Plan Revision) describes the size and extent of representative sample areas (MAs) including old-growth in a transparent planning process that is open and responsive to public input as mandated by USDA Forest Service policy.</p>
<p>6.4.f. The process and rationale used to determine the size and extent of representative samples are explicitly described in the public summary.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 1986 Forest Management Plan contains no public summary. However, the process and rationale used to determine the size and extent of representative sample areas under four proposed alternatives are explicitly described in the "Summary of the Draft Environmental Impact Statement" which accompanies the PLRMP for the ANF (2006).</p>
<p>6.4.g. Forest owners and managers of large, contiguous public forests (see glossary) create and maintain representative protected areas sufficient in size to allow natural disturbances to occur in their natural state.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF staff has identified and protected large representative areas (including but not limited to old-growth, swamps, wetlands, islands, wilderness) of sufficient size (collective, planned area of > 100,000 acres) to allow natural disturbances to occur and progress in their natural state.</p>
<p>6.4. DOD/DOE 1. Broad scale ecological processes (e.g., natural fire regimes, successional patterns, flooding) are restored when:</p> <ol style="list-style-type: none"> 1. they are not present in the landscape in a substantially unmodified condition; and, 2. the size of the forest and its primary mandated use can accommodate their restoration. 	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Broad scale ecological processes are present in the landscape, thereby not requiring restoration.</p>
<p>6.4. DOD/DOE 2. Where existing protected areas within the landscape are not adequate in number, size, or configuration to assure the long-term viability of the existing elements of native biological diversity, the forest manager designates protected areas to enhance their viability.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Existing protected areas within the landscape are adequate in number, size, and configuration to ensure long-term viability of the existing elements of native biological diversity.</p>
<p>NOTES: OBS 5/06: Oversight in how late-successional forest areas (Management Area 6.1) are managed, conserved, and monitored could be strengthened to ensure that these areas are managed according to prescription, perhaps by utilizing technology transfer and monitoring programs that promote their application. (Indicator 6.4.a)</p>	
<p>6.5 Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.</p>	

<p>Criterion Level Remarks: Minor non-conformance. Written guidelines are prepared and implemented to control erosion, minimize forest damage during harvesting, road construction, and other mechanical disturbances. Remarkably little forest damage occurs during harvesting or road construction and riparian area appear well-protected, although not as comprehensively regarding guidelines to protect water resources as quantified by Criteria 6.5.p – 6.5.u.</p>	
<p>6.5.a. Harvesting, road construction, and other mechanical operations meet or exceed state Best Management Practices (BMPs), whether voluntary or mandatory, and other applicable water quality regulations.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Pennsylvania BMPs for harvesting, road construction, and other mechanical operations, and other applicable water quality regulations include: minimizing soil compaction and rutting by matching operating techniques, season of operation, and equipment to soil types and moisture levels; using soil surveys, topographic maps, and on-site evaluations as guides when planning log landings, skid road, and haul road locations; modifying landing and road locations to reflect actual soil, parent material, and topographic conditions; keeping landing and the road network at minimum size required to remove harvested timber; not contaminating soils with fuels, lubricants, and other chemicals; complying with all provisions of Clean Streams Law and Dam Safety and Encroachments Act; designing roads to shed surface water quickly; designing roads and landings to prevent or divert surface water flow; avoiding locating roads and landings on seasonally wet soils, consider slope when laying out roads and landings; providing riparian buffers between disturbed areas, such as roads and landings, and streams or wetlands; preferring bridges and culverts as methods of crossing intermittent and perennial streams, when fords are used for truck crossings stabilize bottom with clean rock; cross wetlands only when necessary; conducting operations in wetlands if heavy equipment is required during driest periods or when ground is frozen; avoiding skidding through water courses or spring seeps; not contaminating water bodies and soil with forest management chemicals and petroleum products; retiring the road network properly at the completion of operations.</p> <p>ANF operations abide by all the above Pennsylvania BMPs. In all the sites visited by the team, only one had a minor problem (bulldozed fence line was not water-barred and some soil erosion occurred). Operations at the other sites conformed to all BMPs.</p>
<p>6.5.b. Written harvest plans, specifying how soil, tree, and water resources will be protected, are incorporated into the management plan or harvesting contract, as appropriate.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>A Timber Sale Contract is drawn up for every timber harvest. Included in these contracts are written requirements for: road maintenance; snow removal; protection of property; protection of habitat of endangered species; protection of habitat of sensitive species; plan of operation for road construction; protection of reserve trees; conduct of logging (to</p>

	<p>protect forest resources); felling and bucking to reduce damage to residuals; skidding and yarding; landings and skid trails; stream course (riparian) protection; culverts and bridges; restrictions on wheeled or tracked vehicular traffic in or across stream courses; erosion prevention and control; temporary roads and landings; reservation of marked (by paint) live or dead wildlife and reserve trees; and reserved areas.</p>
<p><u>Logging and Site Preparation</u></p> <p>6.5.c. The harvest of timber is scheduled and equipment is used in a way that minimizes damage to the soil, e.g., compaction, erosion, sediment transport into streams and other bodies of water, and landslides.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Timber Sale Contracts require interruption or delay of operations to prevent serious environmental degradation or resource damage; restrictions are placed on wheeled or tracked vehicle traffic in or across stream courses; some harvests are scheduled when the ground is frozen or dried; harvest operations are halted when damage to skid and haul trails/roads/landings is thought likely.</p> <p>Culverts are constructed to resist erosion and degradation; roadside ditches are protected by plastic fences and/or damming to direct water through culverts.</p>
<p>6.5.d. Damage to regeneration and residual trees is limited to levels that are at or below levels documented in regionally credible scientific evidence.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Location, layout, and number of skid trails and selection of skidding equipment and contractors are monitored by ANF staff prior to harvest to minimize damage to regeneration and residual trees. Field inspection revealed this to be so. There was minimal skidding/rutting damage, little damage to extant advance regeneration, and negligible damage to residual trees.</p>
<p>6.5.e. Silvicultural techniques and logging equipment vary with slope, erosion hazard rating, and/or soil instability with the goal of reducing soil disturbance to a level that is equal to or less than average soil disturbance documented in regionally credible scientific evidence. Areas that exhibit an extreme risk of landslide are excluded from logging.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Silvicultural and logging techniques and equipment are selected based on site conditions. Much of the potential for erosion, soil disturbance, or landslides is precluded by classification of MAs. MAs identified for emphasis on growing and harvesting timber are primarily located in areas without steep slopes, unstable soils, or soil disturbance.</p>
<p>6.5.f. Plans for site preparation specify the following mitigations:</p> <p>(1) 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 hazard from fire.</p> <p>(2) Scarification of soils is limited to the minimum necessary to achieve successful regeneration of desired species.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Slash is not piled or otherwise concentrated in association with site preparation. Slash is retained on site and is scattered throughout the unit to protect advance regeneration from deer browsing and evenly distribute coarse woody debris across harvest sites.</p> <p>Scarification of soils is avoided as it promotes development of less desirable seedling growth. Soil scarification is very rarely conducted in site preparation, having been used only on an experimental basis – with prescribed fire - for the regeneration of oak and white</p>

	<p>pine. In these very limited trials, scarification is certainly limited to the minimum necessary to achieve the regeneration goals.</p>
<p><u>Transportation System (including permanent and temporary haul roads, skid trails, and landings)</u></p> <p>6.5.g. The transportation system is designed, constructed, maintained, and/or reconstructed to regional standards that reduce the extent of the road network to the lowest level possible consistent with terrain, equipment and markets.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Haul road density is low. They are maintained at a high level permitting re-use rather than building of new haul roads to access additional harvest sites.</p>
<p>6.5.h. Access to temporary and permanent roads is controlled to allow legitimate access as addressed by Principles 3 & 4 and identified in the management plan.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All access spur roads off main trunk lines are gated to control access. Most gates are opened during deer hunting season to allow the highest degree of access and associated highest level of deer harvest to affect a needed reduction in deer herd abundance.</p>
<p><u>Stream and Water Quality Protection</u></p> <p>*6.5.i. Measures to protect streams (including perennial, intermittent, and ephemeral streams and other waters) from degradation of water quality and/or their associated aquatic habitat are used in all operations.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF field staff adhere to all state BMPs to assure maximum protection of streams in all operations. Stream crossings are improved by structures (i.e., minimum corduroy structures for ephemerals, optimum temporary steel or wooden bridges for larger streams, with abutments that prevent washing/eroding of bridgeworks). Logging in or near riparian zones is conducted either far enough away or in a manner that prevents felling or limbing in streams. However, logs or other woody debris found in streams and not resulting from logging or other management operations are not removed, so as to maintain presence of structures in streams conducive to development of riffles, splash dams, and pools. One stream was silted by oil and gas mining activities (well head work on the edge of a forest road, 10 feet from the edge of a stream). Otherwise, most oil and gas sites were observed to be stable with minimal erosion and associated sedimentation. However, there seems to be a need for enhanced regulatory power for the ANF to address and prevent/mitigate such problems where and when they might/do occur.</p>
<p>6.5.j. New roads, trails, and crossings are located, constructed, and maintained in accord with 6.5.e – 6.5.l.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>New skid trails and crossings are located, constructed, and maintained in accordance with 6.5.e – 6.5.i. One new road was encountered on the test evaluation and it was properly graded, stoned, and crowned. A new skid trail on an extremely steep slope (which was salvage-logged) was extensively water-barred, mulched, and seeded, and slash was layered along the downhill side of skid trails to intercept soil and water movement. Slash was deposited in rutted places in other skid trails on other sites to reduce soil compaction and further</p>

	rutting.
<p>6.5.k. Where roads cross perennial or intermittent streams, temporary or permanent bridges, culverts, fords (see Glossary), or other improved crossings are used.</p> <p><i>Note: Perennial streams are defined as solid blue line streams on 7.5-minute quad maps or those that contain water year-around.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Few perennial or intermittent streams were encountered on sites. Those with streams had them crossed with temporary or permanent bridges and culverts.</p>
<p>6.5.l. Temporary and permanent roads are located to limit the number of crossings to that required for access and ensure that crossings are perpendicular to the waterway. In selecting the location of crossings, the impact of the road is minimized by placing a crossing at a natural constriction of a stream's flood plain.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Temporary and permanent roads are limited in number, particularly those crossing streams. Such crossings are perpendicular to the water way and placed at constrictions of the flood plain where possible.</p>
<p>6.5.m. Areas of human-caused erosion (e.g., failed drainage structures) are identified as part of the planning process. Measures are taken to stabilize the erosion, correct existing drainage problems, and prevent new problems.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Sites with the potential for erodible soils are generally avoided rather than harvested. Most steep slope sites or sites with unstable soils were assigned to MAs reserved from harvest so as to avoid the potential for erosion. The ANF has a comprehensive program of providing special trails for ATV and snowmobile recreation, and aggressively monitoring, and patrolling, and enforcing these roads (and roads ATVs and snowmobiles are prohibited from using) via its Law Enforcement Officers, cooperation and enforcement by Pennsylvania Game Commission Wildlife Conservation Officers, and by ANF field staff. This program is an important proactive example of protection of water and soil resources.</p>
<p>6.5.n. Stream crossings are located and constructed to avoid fragmentation of aquatic habitat (see Glossary) and maintain water quality.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Few sites were encountered with stream crossings, which is partly a function of the selection process for assigning highly dissected or steep-slope areas to MAs reserved from harvest. Timber Sale Contracts specify that culverts or bridges used to cross stream courses will be of sufficient size and design, and be installed in a manner, as to provide unobstructed flow of water, and minimize damage to stream courses.</p>
<p style="text-align: center;"><u>Streamside management zones (SMZs)</u></p> <p>6.5.o. The activities of forest management do not result in observable siltation of intermittent streams.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>No siltation was observed in intermittent streams, nor was the potential for such siltation apparent in association with forest management. However, see 6.5.1 for finding on potential for problems with siltation caused by mineral extraction by contractors.</p>
<p>6.5.p. All perennial streams have buffers (streamside management zones, SMZs) that, by using the criteria described in 6.5.q through 6.5.s, include an inner SMZ and an outer SMZ.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Perennial streams do not have buffer zones characterized as inner or outer SMZs, and buffer distances do not match those found in Table 6.5.t on p. 27 of the Final Appalachia (USA) Regional Forest Stewardship Standard Version 4.2 (CAR 4/06). In one</p>

	instance, the established buffer zone about an intermittent stream was not as wide as called for by ANF standards.																													
6.5.q. The entire SMZ of intermittent streams is managed as an outer buffer zone as described in Table 6.5.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> SMZs of intermittent streams are being managed as outer buffer zones as described in Table 6.5.t.																													
<p><u>Inner SMZs for non-high-quality waters</u></p> <p>6.5.r. The inner SMZ extends 25 feet from the high water mark (see Glossary). Single-tree selection or small group selection (2-5 trees) is allowed in the inner SMZ, provided that the integrity of the stream bank is maintained and canopy reduction does not exceed 10 percent (90 percent canopy maintenance). Trees are directionally felled away from streams.</p> <p><i>Note: The inner SMZ is designed as a virtual no-harvest zone, while allowing the removal of selected high-value trees.</i></p>	Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Current ANF policy for harvest does not prohibit harvest within the inner SMZ on non-high-quality waters (CAR 4/06).																													
<p><u>Inner SMZs for high quality waters</u></p> <p>6.5.s. Along perennial streams that are designated as high-quality waters (see state or local listings describing the highest quality waters in the state or region), no harvesting is allowed in the inner SMZ (25 feet from the high water mark), except for the removal of wind-thrown trees. Stream restoration is allowed if a written restoration plan provides a rational justification and if the plan follows local and regional restoration plans.</p>	Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Current ANF policy for harvest does not prohibit harvest within the inner SMZ on high-quality waters (CAR 4/06).																													
<p><u>Outer SMZs for all streams</u></p> <p>6.5.t. Outer SMZs, outside and in addition to inner SMZs, are established for all intermittent, and perennial streams, as well as other waters. When the necessary information is available, the width of a stream management zone is based on the landform, erodibility of the soil, stability of the slope, and stability of the stream channel as necessary to protect water quality and repair habitat. When such specific information is not available, the width of streamside management zone is calculated according to Table 6.5.</p> <table border="1" data-bbox="201 1549 831 1869"> <thead> <tr> <th colspan="6">Table 6.5.t Widths Of Inner And Outer Streamside Management Zones Where Data Do Not Prescribe Narrower Widths*</th> </tr> <tr> <th rowspan="2">STREAM ZONE TYPE</th> <th colspan="5">SLOPE CATEGORY</th> </tr> <tr> <th>1-10%</th> <th>11-20%</th> <th>21-30%</th> <th>31-40%</th> <th>41% +</th> </tr> </thead> <tbody> <tr> <td>Inner Zone (perennial)</td> <td>25'</td> <td>25'</td> <td>25'</td> <td>25'</td> <td>25'</td> </tr> <tr> <td>Outer Zone</td> <td>55'</td> <td>75'</td> <td>105'</td> <td>110'</td> <td>140'</td> </tr> </tbody> </table>	Table 6.5.t Widths Of Inner And Outer Streamside Management Zones Where Data Do Not Prescribe Narrower Widths*						STREAM ZONE TYPE	SLOPE CATEGORY					1-10%	11-20%	21-30%	31-40%	41% +	Inner Zone (perennial)	25'	25'	25'	25'	25'	Outer Zone	55'	75'	105'	110'	140'	Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> SMZs are neither specified as inner or outer nor do they conform to widths established for perennial streams as specified in Table 6.5.t (CAR 4/06).
Table 6.5.t Widths Of Inner And Outer Streamside Management Zones Where Data Do Not Prescribe Narrower Widths*																														
STREAM ZONE TYPE	SLOPE CATEGORY																													
	1-10%	11-20%	21-30%	31-40%	41% +																									
Inner Zone (perennial)	25'	25'	25'	25'	25'																									
Outer Zone	55'	75'	105'	110'	140'																									

(perennial)					
Total for perennial	80'	100'	130'	135'	165'
Zone for Intermittent	40	50'	60'	70'	80'

*All distances are in feet -slope distance and are measured from the high water mark (see Glossary).

SMZ sizes are minimum widths that are likely to provide adequate riparian habitat and prevent siltation. If functional riparian habitat and minimal siltation are not achieved by SMZs of these dimensions, wider SMZs are needed.

6.5.u. Harvesting in outer SMZs is limited to single-tree and group selection (see Glossary), while maintaining at least 50 percent of the overstory. Roads, skid trails, landings, and other similar silviculturally disturbed areas are constructed outside of the outer SMZ, except for designated stream crossings or when placement of disturbance-prone activities outside of the SMZ would result in more environmental disturbance than placing such activities within the SMZ. Exceptions may be made for stream restoration.

Note: The SMZ is designed to allow harvesting and provide flexibility for silvicultural management.

AC 6.5.1. Where federal, state, county and local BMP guidelines, recommendations, and regulations provide several options, the most effective measure is applied.

Conformance with Indicator: Yes No N/A

Current ANF policy for harvest does not limit harvests within the outer SMZ to single-tree and group selection while maintaining at least 50% of the overstory. However, roads, skid trails, landings, and other disturbed areas are constructed outside SMZs (**CAR 4/06**).

Conformance with Indicator: Yes No N/A

Pennsylvania BMPs, when more restrictive than federal, county, and local BMPs, are followed and provide effective measures for conservation.

NOTES: **CAR 4/06:** In both written policy and practice, the ANF shall amend its management strategies within and near riparian areas as follows:

- buffer zones for perennial and intermittent streams shall match those found in Table 6.5.t of the Final Appalachia (USA) Regional Forest Stewardship Standard Version 4.2;
- management activities conducted in proximity to riparian zones shall observe streamside management zones (SMZs) in conformance with Table 6.5.t.;
- clarify whether harvests are allowed in the inner SMZs of non-high-quality and high-quality water courses and assure that such clarification conforms with 6.5.r; and
- stipulate that harvests within the outer SMZ are limited to single-tree and group selection while maintaining at least 50% of the overstory. (Indicators 6.5.p, 6.5.r, 6.5.s, 6.5.t, 6.5.u)

6.6 Management systems shall 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.

Applicability Note to Criterion 6.6: This Criterion is guided by FSC Policy Paper and Guidelines: Chemical Pesticides in Certified Forests: Interpretation of the FSC Principles and Criteria. Revised July 2002. In addition, 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.

<p>Criterion Level Remarks: Minor non-conformance. Management systems promote adoption of environmentally friendly non-chemical methods of pest management but realize that for most insect and plant pests chemicals are the only efficient and cost-effective treatment available. Type 1A and 1B chlorinated hydrocarbon pesticides, persistent, toxic, or derivative chemicals that remain biologically active and accumulate in food chains beyond intended use, and those banned by international agreement are banned and not used. When chemicals are used, use of equipment and training are performed by contractors with little control over health risks exerted by ANF staff, beyond reservation of use to chemicals posing little human risk. Incidences of worker (contractor or ANF employee) exposure to chemicals are not documented nor are written records kept of such exposure. Application (rates, timing, locations, restriction of use in sensitive areas like riparian zones or other wetland bodies) of chemicals is governed to minimize environmental risks.</p>	
<p>6.6.a. Forest owners or managers employ silvicultural systems, integrated pest management, and strategies to control vegetation that have been scientifically proven to have the lowest number of non-target effects. Chemical pesticides are used only when non-chemical management practices have been proven ineffective or require expenditures exceeding economic gains.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Interference in the form of striped maple, American beech, and New York and hay-scented ferns has stifled regeneration of diverse and desirable seedling species for decades on the ANF. These interfering plants achieved understory dominance through browsing by an overabundant deer herd which changed understory dynamics by nearly eliminating shrub and seedlings of most seedlings excepting striped maple and American beech. Fencing potential regeneration sites eliminated the majority of deer browsing, but does not address the existing problem with understory dominance by interfering plants. The only known effective and economical solution to interference is application of herbicides. The Warren Forestry Sciences Laboratory conducted research on efficacy and non-target effects of herbicides and determined that two herbicides (glyphosate and metsulfuron methyl), when applied together, provided economical and effective control of interference while posing little hazard to non-target organisms, including small mammals, songbirds, amphibians, shrubs, and herbaceous vegetation. Neither chemical is on the list of chemicals prohibited under FSC rules of voluntary forest certification. The ANF utilizes these herbicides as a necessary control for interfering vegetation.</p> <p>Other chemicals are potentially used by Allegheny Power Company and GPU Energy for controlling tall-growing vegetation on electric utility rights-of-way passing through the ANF. These additional include fosamine ammonium, imazapyr, picloram, and triclopyr. Of these latter chemicals imazapyr is classified by FSC as "highly hazardous". The others are neither prohibited nor classified as highly hazardous. The Final EIS (1997) issued by the ANF on vegetation management on electric utility rights-of-way evaluated health and environmental consequences of the above-mentioned chemicals on human health, wildlife and aquatic species risks, RT&E species, and biodiversity for all the above-mentioned chemicals.</p>
<p>6.6.b. Forest owners or managers develop written strategies to control pests as a component of the</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

<p>management plan (see Criterion 7.1).</p>	<p>The 1986 LRMP for the ANF recognized threats to forest management posed by insects, disease, deer overbrowsing, and interfering vegetation but does not provide written strategies for control of these pests. The 2006 draft PLRMP provides more detail on goals and objectives for managing deer overbrowsing, interfering plants, and non-native invasive plants and provides a written strategy, including timing, application rates, and herbicides selected for control of interfering plants. Strategies to control pests are developed only as issues emerge and associated document are addressed through the appropriate NEPA documentation.</p>
<p>6.6.c. When chemicals are used, a written prescription is prepared that fully describes the risks and benefits of their use and the precautions that workers must employ.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>A comprehensive human health risk assessment was prepared by the ANF as part of the programmatic direction for herbicide use that includes required mitigation measures for public, employee and contractor safety. This assessment is one basis for prescription writing. Selection of sites for application of chemicals, selection of chemicals, and timing and application rates are established by ANF personnel. Stand prescriptions for pesticide applications are written that include site-specific mitigation measures needed to protect environmental concerns, as well as public and worker safety. Chemical applications are performed by contractors rather than by ANF employees. Herbicide contracts include detail on application methods, safety precautions and requires that the operator be a state certified pesticide applicator. The ANF requires all herbicide contractors to submit current pesticide certification certificates annually. Information on risks of chemicals to human health is contained in the 2006 draft PLRMP.</p>
<p>6.6.d. Records are kept to document the occurrences of pests, measures to control them, and incidences of worker exposure to chemicals.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF records incidences of insect pest occurrence and levels of impact across the Forest with maps and written records. Estimates of total acreage affected by interfering vegetation are made but not specifically mapped. Estimates of white-tailed deer density are calculated annually in varying degrees of completeness across the ANF. Records of incidences of worker (contractor or Allegheny National Forest employee) exposure to chemicals are noted on the inspection report filed with all applications of chemicals on ANF forestlands.</p> <p>Pesticide contractors work under three different protocols that assure worker safety – they must abide by the contract, the safety plan, and they must follow label directions. The ANF annually updates the safety plan that spells out the required safety equipment to be used. Contract activity is closely monitored by either the</p>

	contracting officer's representative or a designated inspector (these people are also certified pesticide applicators). Activity is documented for each unit that is treated in a daily diary. Any exposure would be documented in the daily diary and summarized as part of a post contract review which includes monitoring of actual amounts of herbicide used (to determine that the ANF is within allowable measures evaluated in the risk assessment).
6.6.e. Employees are trained in proper the handling, storage, and disposal of chemicals. Employees who apply pesticides either meet or exceed local and state certification for applicators.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> ANF employees do not handle, apply, store, or dispose of chemical pesticides. Rather, contractors are used who are state-certified and are trained to properly handle, store, and dispose of chemicals. ANF staff who supervise on-site application of chemicals by contractors receive training and are certified pesticide applicators.
6.6.f. Chemicals are applied according to label directions, and protective equipment is both available and used.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Chemicals are used according to label directions and ANF staff observe all chemical applications on ANF forestlands and insure, among other things, that protective equipment is available and used.
6.6.g. When chemicals are used, they are narrowly targeted to the species being controlled.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> When chemicals are used, they are targeted to species being controlled, and timing, location, and rates of application are designed to optimize impacts on target species and minimize impacts on non-target species.
6.6.h. Chemicals are used only when they pose no threat to supplies of domestic water, aquatic habitats, or sensitive species or plant community types.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Only chemicals determined to pose no hazards to supplies of domestic water, aquatic habitats, or sensitive species or plant communities (glyphosate and sulfometuron methyl) are approved for use. No-spray buffer zones are established for application of such chemicals. These zones exceed minimum safe distances suggested by regulatory bodies. 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, are not used on the ANF. However, in a recent revision by FSC of its pesticide policy, chemicals defined as "highly hazardous" may not be used on FSC certified forests. One of the chemicals (Imazapyr) potentially used by contractors on electric powerline rights-of-way on the ANF is on the FSC "highly hazardous" list (CAR 5/06).
6.6.i. Aerial spraying of pesticides is used only for the control of exotic species.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	<p>In the past, aerial spraying of pesticides was used to control exotic species (e.g., gypsy moth) and severe outbreaks of native species (e.g., elm spanworm) that threaten the health and integrity of large-scale forest ecosystems. While there is no current prohibitions against aerial application of pesticides against native (insect) species, the rarity of their use on the ANF is consistent with the intent of the criterion.</p>
<p>NOTES: CAR 5/06: ANF must develop and implement safeguards to ensure chemicals prohibited by the FSC Chemical Use Policy and amendments either are not applied, or are temporarily permitted through a formal derogation issued by the FSC for the use of specific prohibited chemicals. (Indicator 6.6.h)</p>	
<p>6.7 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.</p>	
<p>Criterion Level Remarks: Minor non-conformance. Procedures are in place to reduce the potential for chemical (including fuel and oil) spills. Chemicals, containers, and liquid and solid non-organic wastes are disposed of in an environmentally safe manner at approved off-site locations (such locations may be at approved sites within the ANF).</p>	
<p>6.7.a. In the event of a spill of hazardous material, forest owners or managers immediately contain the material, report the spill as required by applicable regulations, and engage qualified personnel to perform the appropriate removal and remediation that ensures disposal of materials in a manner that avoids contamination.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If spills of less than one gallon occur on the ANF, they are contained and removed by the contractor. Larger spills must be reported to the Pennsylvania Department of Environmental Protection, and a professional company (Chemtrec) remediates them. Timber Sale Contracts awarded by the ANF require that appropriate preventative measures are taken to insure that any oil spills do not enter streams or other waters. If on-site storage of oil products exceeds 1,320 gallons, or if single oil containers exceed 660 gallons, a spill prevention control and countermeasures plan that meets applicable EPA requirements, including certification by a registered engineer, is required.</p>
<p>6.7.b. Broken and leaking equipment and parts are repaired or removed from the forest; discarded parts are taken to a designated disposal facility that disposes materials in a manner that avoids contamination.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Timber Sale Contracts awarded by the ANF require that refuse from repair of equipment shall be removed from National Forest lands or buried at agreed locations. Contracts further require that equipment shall not be repaired on National Forest lands where pollution of lakes or streams is likely to occur. No leaking or broken equipment was observed on operational sites during the test evaluation.</p>
<p>6.7.c. Equipment is not parked in riparian management zones, near sinkholes, or ground water supplies, where fluids can leak into them.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>During the test evaluation no incidences of equipment parked in riparian zones, near sinkholes, or ground water was observed. Instructions to contractors specify that equipment is not parked in locations that pose a risk to water and associated resources. These instructions are enforces through regular site visits by ANF staff.</p>
<p>6.7.d. Forest owners or managers and their contractors participate actively in local recycling and reuse programs that dispose materials in a manner that avoids contamination.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Maintenance personnel for the ANF recycle materials where possible and dispose of materials in a manner</p>

	that avoids contamination, but no such requirement is placed upon contractors (CAR 6/06).
6.7.e. Procedures are established for the proper management of all waste oil, filters, containers, litter, and other forms of waste created during the harvest operation in a manner that avoids contamination.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Timber Sale Contracts issued to contractors for harvest operations specify that steps are taken to prevent spillage of waste oil and all forms of waste created during harvests are disposed of (buried at agreed upon locations or removed to waste facilities).
NOTES: CAR 6/06: The ANF must require that contractors participate in local recycling and reuse programs that dispose of materials to avoid contamination. (Indicator 6.7.d)	
6.8. 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.	
<i>Applicability Note to Criterion 6.8: Genetically improved organisms (e.g., Mendelian crossed) are not considered to be genetically modified organisms (i.e., results of genetic engineering), and may be used. The prohibition of genetically modified organisms applies to all organisms including trees. This Criterion is guided by the FSC policy paper: GMOs: Genetically Modified Organisms: Interpretation for FSC. Revised October 1999.</i>	
Criterion Level Remarks: Conformance. Use of biological control agents is documented, minimized, monitored, and controlled in accordance with laws and protocols. Genetically-modified organisms are not used in pest control.	
6.8.a. Exotic (i.e., non-indigenous), non-invasive predators or biological control agents are used only as part of a pest management strategy for the control of exotic species of plants, pathogens (see Glossary), insects, or other animals when alternative pest-control methods are ineffective or can be expected to prove ineffective. Such use is contingent on peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for indigenous species. (For example, exotic species can host pathogens that might diminish biodiversity in the forest.) Exceptions are allowed for restoration of extirpated species.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Exotic, non-invasive predators, or biological control agents (primarily BT) are used only as part of a pest management strategy for control of exotic insects when alternative pest-control methods are proven ineffective. Use is contingent on peer-reviewed, scientific evidence and follows established guidelines and protocols. BT is non-invasive, but does pose a threat to non-target lepidopteron larvae. Past usage on the ANF did not indicate long-term adverse impacts on non-target lepidopteron (or songbird predators of non-target lepidopteron).
6.8.b. Forest owners and managers document the use of exotic non-invasive predators and biological control agents and strictly follow all applicable laws, regulations and scientific protocols.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Involved ANF staff document the use of exotic non-invasive predators and biological control agents and strictly follow all applicable laws, regulations, and scientific protocols.
NOTES: None	
6.9 The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	
Criterion Level Remarks: Conformance. Use of exotic species is controlled and monitored. Occurrence of exotic invasives is monitored and control measures applied where necessary.	
6.9.a. The use of exotic plant species (see Glossary) is contingent on peer-reviewed scientific evidence that any species in question is non-invasive and does not diminish biodiversity. If non-invasive exotic plant species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The ANF uses regionally adapted and approved exotic grasses and legumes in seeding roadsides, landings, and skid trails. These species are relatively non-invasive and have not been recorded in the literature to cause problems or limit biodiversity. Their provenance and loci of use are documented.

6.9.b. Forest owners or managers develop and implement control measures for invasive exotic plants.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> ANF field staff routinely survey likely sites of occurrence of invasive exotic plants and record their presence. Staff annually receive training in identification of exotic, invasive plant species. Control measures (hand pulling, limited and spot herbicide application) are implemented.
AC 6.9.1. Managers of National Forests identify high risk activities by which invasive exotic plants become established. Control mechanisms are implemented for high risk activities associated with Forest Service management responsibilities.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> ANF field staff have identified areas with high risk activities (e.g., vehicular traffic areas conducive to spread of exotic species seeds), especially landings, and regularly monitor them for exotic plants. Appropriate control mechanisms (hand-pulling, mowing, cutting with weed trimmers) are employed when exotics are found.

NOTES: None

6.10. 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.

Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.

Criterion Level Remarks: Not applicable.

	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Forest conversion does not occur.
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NOTES: None

PRINCIPLE 7. MANAGEMENT PLAN - 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.

<u>Criteria and Indicators</u>	<u>Findings</u>
<p>7.1. 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 harvesting techniques and equipment to be used.</p>	

Applicability Note to Criterion 7.1: The management plan may consist of a variety of documents not necessarily unified into a single planning document but which represents an integrated strategy for managing the forest.

Appropriate to scale, intensity and context of management, owners or managers of small forests that practice low-intensity forestry may meet this requirement with less extensive and detailed planning documents. Large landowners and/or those who practice more intensive forest management (see Glossary) are expected to meet the full breadth and scope of this Principle.

Criterion Level Remarks: Minor non-conformance. Nearly all elements required of a management plan in the standard were exceptionally well met, with notable efforts in: 1) development and statement of goals and objectives; 2) assessment of direct, indirect and cumulative effects of management activities; 3) description and justification of silvicultural systems; 4) considerations of RT&E species and communities; and 4) plans for monitoring explicitly connected to objectives. A small set of elements required by the standard were not included in the Plan.

7.1.a. Management objectives

7.1.a.1. A written management plan is prepared that includes the landowner's short-term and long-term vision, goals, and objectives (ecological, silvicultural, social, and economic). The objectives are specific, achievable, and measurable.

Conformance with Indicator: Yes No N/A

Both the 1986 Plan and the PLRMP include detailed accountings of visions, goals, and objectives. Objectives are well developed in that they are specific, achievable, and measurable. Both these plans—current and draft—set long-term guidance for forest and natural resource management. To achieve the objectives of the Plan, more specific, short-term project planning occurs during the Plan period. For example, many elements of planning were observed to be detailed at a tactical level in individual projects (e.g., see Martin Run Project Draft Environmental Impact Statement, dated November 2004; size of this project area is over 8,000 hectares, or 20,000 acres). Planning was a clearly demonstrated combination of both strategic (1986 plan, the new PLRMP) and tactical (individual project area) documents.

7.1.a.2. A strategy is described for monitoring the effectiveness of management and the overall condition of the forest- (see Principle 8).

Conformance with Indicator: Yes No N/A

A strategy is developed as part of both the 1986 Plan and PLRMP to “access whether Forest Plan goals and objectives are being met.” (p. II-25, PLRMP). The strategy is more complete and refined in the current PLRMP, but the 1986 Plan is generally adequate in meeting this standard.

7.1.a.3. Employee and contract policies are described.

Conformance with Indicator: Yes No N/A

Employee and contract policies were not presented in the Plan, but are well covered by federal law and regulation and completely covered by ANF policy and procedure (see findings associated with Principle 4).

7.1.a.4. Goals, objectives, and methods are described for: (1) harvest and regeneration, (2) pest management, (3) fire management, and (4) conservation of applicable species and plant community types (i.e., those that are covered by Criterion 6.2), protection of riparian management zones (see Criterion 6.5), establishment and protection of representative samples of existing ecosystems (see

Conformance with Indicator: Yes No N/A

Goals and objectives are well described, and presented in findings associated Criterion 7.1.a.1. The ANF specifically addressed elements associated with this Criterion 7.1.a.4 in both the 1986 Plan and the PLRMP. Methods are described in various “Standards and Guidelines” sections of the Plan.

<p>Criterion 6.4), and management of High Conservation Value Forests (see Principle 9).</p>	<p>NOTE: See findings associated with Criterion 6.5 for the protection of riparian zone, with Criterion 6.4 for the protection of representative samples of existing ecosystems, and with Principle 9 for the management of HCVPs.</p>
<p>7.1.a.5. <i>Appropriate to the scale, intensity, and context of management</i>, the plan <i>may include</i> the additional elements described in Appendix C.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Findings were developed for each criterion across Principle 7 in a manner consistent with the list of elements of a management plan, as presented in Appendix C from the Final Appalachia (USA) Regional Forest Stewardship Standard Version 4.2.</p>
<p>7.1.a.6. Mechanisms for resolving grievances and providing fair compensation for loss or damage to local people are described.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Mechanisms for resolving grievances and providing fair compensation for loss or damage to local people are not described in the Plan, but are instead a part of organizational culture (see findings associated with Criterion 2.3). A “Forest Service Dispute Resolution Guide” (dated July 3, 2000) is available to aide resolutions of grievances.</p>
<p>7.1.b. Description of forest resources to be managed, environmental limitations, land use and ownership status, socioeconomic conditions, and profile of adjacent lands.</p>	
<p>7.1.b.1. Using data collected by methods appropriate to the scale and intensity of management, as well as the information collected by the landowner/manager as per indicators 6.1.a and 6.1.b forest owners or managers describe the following resources:</p> <ul style="list-style-type: none"> ▪ timber ▪ fish and wildlife ▪ harvested non-timber forest products (e.g., botanical and mycological) ▪ non-economic natural resources 	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Complete descriptions and assessments of forest resources to be managed are presented in various documents, including the draft document entitled “Allegheny National Forest Draft Environmental Impact Statement to Accompany the Proposed Land and Resource Management Plan” (abbreviate DEIS), dated May 2006. Assessment of environmental limitations are present in the DEIS and other such documents with various analyses of direct, indirect, and cumulative effects of management. Timber, fish, and wildlife, and various non-economic natural resources (i.e., soil, water, air, plant and animal habitats, scenery management) are included in these analyses.</p> <p>NTFPs are not described, managed or monitored (CAR 3/06). The ANF does require permits for commercial collections of select NTFPs, and approve very few. Most permits are associated with some kind of scientific research. The primary collections that occur on the forest for consumption include only leeks. Ground pine is harvested for wreath making. The ANF claims that NTFPs are not as sensitive issue on the ANF as it is on other National Forests.</p>
<p>7.1.b.2. The management plan includes a description of past land uses and incorporates this information into goals and objectives.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Description of past land uses is presented in subsections entitled “Background and Historical Perspective” (p 3-67 through 3-71, DEIS) in the section</p>

	<p>entitled “3.3.1 Forest Vegetation”. This information has been incorporated into goals and objectives in various ways (e.g., the oak-hickory forest community, which covers 16% of the ANF’s forest land, is related to Native American land use in the major drainages) To maintain the oak type, new strategies are planned including increased use of prescribed fire as a management objective (see p. A-12 through A-13, and see objective under “2400 Vegetation Management” on p. II-4, PLRMP).</p>
<p>7.1.b.3. The management plan identifies the legal status of the forest and its resources (e.g., ownership, usufruct rights, treaty rights, easements, deed restrictions, and leasing arrangements).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The management plan does not identify the legal status of the forest and its resources, but this information is available in other sources as a basis for management planning. Ownership and associated legal status of the forest and its resources are long standing and transparent. As noted in the findings associated with Criterion 2.1.b, the “Land Program Manager presented to the evaluation team evidence of clear title to ANF lands. Additionally, a randomly requested deed and an abstract folder were reviewed on-site.” One area of particular concern is associated with OGM. “Ninety-three percent of the subsurface mineral rights on the ANF are privately held” (0. I-22, PLRMP), yet the ANF can not completely list who owns those subsurface rights (OBS 6/06). The ANF does have acquisition files on all tracts of land that have been acquired that describe ownership of the surface and what status the minerals are in (reserved or outstanding). A complete identification of all subsurface rights owners may not be possible given the limited records kept by county courthouses. There is no regulation for the surface owner to be notified as subsurface rights change hand, nor are any map records kept. A grantor-grantee search to determine changes in subsurface ownerships is possible, but would be costly to keep current.</p>
<p>7.1.b.4. The management plan identifies relevant cultural and socioeconomic issues (e.g., traditional and customary rights of use, issues of access, recreational uses, and issue surrounding employment), current conditions (e.g., composition of the workforce, stability of employment, and changes in forest ownership and tenure), and areas of special significance (e.g., ceremonial and archeological sites).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All elements of Criterion 7.1.b.4 are met. Relevant cultural and socioeconomic issues are well detailed in the 1986 Plan and the PLRMP. An organizational chart is available outside the plan that shows work positions. Work positions are described in terms of roles and responsibilities. Demographic data for the workforce has been developed, as well as records of training, certifications, etc. Changes in forest ownership and tenure, particularly in reference to acquired land area that has periodically occurred (e.g., private land inholdings purchased by the federal government over time to consolidate forest lands), are accounted for as a basis for management planning in formal plan amendments (since 1982: amendments 4,5,9,10 and 12).</p>

<p>7.1.b.5. The management plan incorporates landscape-level considerations within the ownership and among adjacent and nearby lands, to include but not be limited to major water bodies, critical habitats, and riparian corridors shared with adjacent ownerships.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 1986 Plan can be considered as “landscape-level planning”. Over time, the plan has been updated through Project Area activities through the use of GIS and expanded analysis considerations. In the PLRMP, Alternatives B, C, and D in the PLRMP present a landscape-level consideration within the ownership. Large patches of older forest are to be provided for and linked in a connected pattern across the landscape (p. 2-5 and 2-6, DEIS). Total acres in this “late structural linkage” management area (MA 2.2) are planned at between 99,000 and 129,000 acres for Alternatives B, C and D, and zero acres for Alternative A (Table 2-1, p. 2-16, DEIS).</p>
<p>7.1.b.6. The management plan identifies opportunities to coordinate management goals and activities with other owners and managers within the landscape.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>While the Plan per se does not identify opportunities to coordinate management goals and activities with other owners and managers within the landscape, all adjacent landowners are provided such opportunities thru public involvement letters in all projects. Potential impacts and effects of forest management are fully and formally considered through cumulative effects analyses.</p>
<p>7.1.c. Description of silvicultural and/or other management system.</p>	
<p>7.1.c.1. Silvicultural system(s) and prescriptions are based on the integration of ecological and economic characteristics (e.g., successional processes, soil characteristics, existing species composition and structures, desired future conditions, and market conditions). (see also 6.3.a., forest regeneration and succession).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Silvicultural systems are well described in the various planning documents, including the new PLRMP (see various connections between silviculture and “Forest-wide Design Criteria” across Section III; Management Area specific description of silviculture in Section IV; and a finely detailed accounting of forest ecology and silviculture for the Forest in Appendix A). Similarly, silviculture is well described in the DEIS.</p> <p>Silvicultural systems and prescriptions (see findings associated with Criteria 7.1.c.2 and 7.1.c.3, below) are based on the integration of ecological and economic characteristics throughout the PLRMP and the DEIS.</p>
<p>7.1.c.2. Prescriptions are prepared prior to harvesting, site preparation, pest control, burning, and planting and are made available to people who carry out the prescriptions.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Prescriptions are prepared prior to silvicultural interventions. These are made available to those who carry out prescriptions via timber sale (or other) documents. For timber harvests, this document is entitled “Layout, Marking, and Harvest Guidelines.” A pre-work conference between the purchaser and the ANF is held to transfer information on: sale area specifics, plans, and designations; timber specifications; payment, performance and settlement; and operations.</p> <p>The team evaluated written prescriptions for each</p>

	stand/payment unit visited during the test evaluation. Prescriptions include information on: unit identifier (i.e., compartment, payment unit, stand); name/type and purpose of management intervention; wildlife marking recommendations; vegetation marking guide; mitigation measures; and field maps that show leave area locations and other useful features for sale administration. Commonly, the prescription is accompanied by a "Field Reconnaissance Report," done prior to silvicultural or other intervention that provides site-specific information on: overstory; shrub layer; understory; potential/unique habitats or features and associated communities; wildlife and wildlife resources; and narrative.
7.1.c.3. Areas that are no longer in use are closed after harvests. The impact of harvesting on future crop trees and the forest as a whole is assessed.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>All forest areas that were no longer in use (i.e., silvicultural or other treatment applied) were observed to be closed after harvests. Evidence for closure included completed silviculture (e.g., cutting, fencing) and completed BMPs.</p> <p>The impact of harvesting on future crop trees and the forest as a whole is assessed in many different ways. In the short-term, a "Timber Sale Inspection Report" is regularly produced for each sale once or twice a week. These inspections include elements related to future crop trees and the stand as a whole.</p> <p>See findings associated with Principle 8 for monitoring the impact of harvesting on "the forest as a whole".</p>
7.1.d. Rationale for the rate of annual harvest and species selection (see criterion 5.6)	
<i>Note: The Working Group considers this sub-criterion sufficiently explicit and measurable. Indicators are not required.</i>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Rationale for the rate of annual harvest and species selection are well described in the PLRMP and DEIS (see findings associated with Criterion 5.6).</p>
7.1.e. Provisions for monitoring forest growth and dynamics (see also Principle 8).	
7.1.e.1. Monitoring goals and objectives are stated in the management plan.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Monitoring goals and objectives are explicitly stated in the management plan (see findings associated with Criterion 7.1.a.2).</p>
7.1.f. Environmental safeguards based on environmental assessments (see also Criterion 6.1)	
<i>Note: The Working Group considers this sub-criterion sufficiently explicit and measurable. Indicators are not required.</i>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Environmental safeguards are thoroughly based on environmental assessments (see findings associated with Criterion 6.1).</p>
7.1.g. Plans for the identification and protection of rare, threatened, and endangered species.	
7.1.g.1. State heritage programs are contacted regarding the occurrence of species referred to in Criterion 6.2, and any report received is attached to the plan.	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Plans for the identification and protection of RT&E</p>

	species are well-detailed in various planning documents (see findings associated with Criterion 6.2).
7.1.g.2. Strategies for protecting rare, threatened and endangered species or plant community types are described in the management plan.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Strategies are described in the Plan for protecting RT&E species or plant community types (see findings associated with Criterion 6.2).
7.1.h. Maps describing the forest resource base including protected areas, planned management activities, and land ownership.	
7.1.h.1. The management plan includes forest-level maps of relevant landscape-level factors, including property boundaries, roads, areas of timber production, forest types by age class, topography, soils, areas of cultural and customary use; locations of and habitats of species referred to in Criterion 6.2; and designated High Conservation Value Forest, and riparian zones. Stand-level maps include springs, wetlands, and archaeological sites.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Maps at all scale (stand to forest) are exceptionally high quality and include all of the elements listed in the FSC standard. Maps describe the forest resource base at a high-level in support of sustainable forest management.
7.1.i. Description and justification of harvesting techniques and equipment to be used. (see also Criterion 6.5)	
<i>Note: The Working Group considers this sub-criterion sufficiently explicit and measurable. Indicators are not required.</i>	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> A description and justification of harvesting techniques and equipment to be used is not explicitly provided in the Plan (OBS 7/06). Instead, such considerations are provided in various project-level planning document, including silvicultural prescriptions that prescribe types of harvest equipment as a function of site conditions.
7.1.a DOD/DOE 1. Regional and/or site-specific plans for conservation, protection, and restoration, proposed by agencies, scientists, and/or stakeholders, are addressed during forest management planning.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Citizens, tribes, government agencies, and public and private organizations are regularly contacted by mail, e-mail, and through announcements in broadcast and print media through the development and implementation of the Plan (see p. 1-5, DEIS). In addition, public meetings and periodic, facilitated workshops have been used to garner public input into management planning and implementation. See findings associated with Criterion 2.2 for specifics on the planning process as “enhanced by the National Environmental Policy Act (NEPA) of 1969. This Act brought environmental analysis and public participation into planning of federal activities. The NEPA process makes information available to the public both before decisions are made and prior to taking action.” An example of how forest-wide plans for conservation, protection, and restoration proposed by agencies, scientists, and/or stakeholders were addressed during forest management planning is presented in the DEIS (p. 2-11 through 2-15). The ANF presented how various management alternatives from different organizations, each commenting differently on the future management

	<p>of the ANF, were considered in the development of the PLRMP and DEIS. Organizational input was fully considered from the Allegheny Defense Project, Friends of Allegheny Wilderness, Allegheny Trail Riders, Allegheny Alive, Allegheny Hardwood Utilization Group, and The Nature Conservancy.</p>
<p>NOTES: See CAR 3/06 associated with Criterion 5.2. OBS 6/06: In order to identify the legal status of the forest and its resources, the ANF could continue to work on developing a working list of owners of subsurface rights, particularly as related to oil and gas development. (Indicator 7.1.b.3) OBS 7/06: A description and justification of harvesting techniques and equipment should be developed as a broadly applicable planning document. (Indicator 7.1.i)</p>	
<p>7.2 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.</p>	
<p>Criterion Level Remarks: Conformance. The first, true forest management plan was constituted in 1986. Revision of the Plan began in the late 1990s and is to be completed in 2007. Federal law requires that results of monitoring or new scientific and technical information, as well as changing environmental, social, and economic circumstances, are responded to in forest plan revision. The ANF has accomplished forest plan revision according to law.</p>	
<p>7.2.a. Relevant provisions of the management plan are modified: (1) every 10 years or in accordance with the frequency of harvest for the stand or forest, whichever is longer; (2) in response to effects from illegal and/or unauthorized activities (e.g., damage to roads, depletion of timber and non-timber resources), (3) in response to changes caused by natural disturbances, and/or (4) in response to the results of monitoring.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>A technically sound and realistic timeframe exists for revision/adjustment of the management plan, though the time frame for a USDA Forest Service (10 to 15 years, and effectively 20 years) plan revision can be longer than prescribed by FSC standards (10 years, Indicator 7.2.b). Also see findings associated with Criterion 1.4. Current plan revision is ongoing. It is 21 years since the last plan was developed (1986-2007). In the interim, management plan revisions have regularly occurred on a timely and consistent basis via plan amendments, white papers, and through project area tactical plans.</p>
<p>7.2.b. A summary of forest management activities is provided annually, and the management plan is revised at least every ten years.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Summaries of forest management activities are annually provided by the ANF to the public.</p>
<p>NOTES: None</p>	
<p>7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.</p>	
<p>Criterion Level Remarks: Minor non-conformance. While forest workers were determined to be knowledgeable and skilled and well supervised, leading to proper implementation of the management plan, it regularly occurs that logging and silvicultural contractors are not certified or trained by certified local, state, or national programs.</p>	
<p>7.3.a. Forest owners and managers use logging and silvicultural contractors who are certified or trained by certified local, state, or national programs.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF periodically uses logging contractors who are not certified in the Certified Logger programs (CAR 7/06). It is common for timber purchasers to contact loggers from other states, meaning that they are not certified by the Pennsylvania Certified Logger programs. Some of these out-of-state workers are also not certified in their own states (based on field interviews with loggers).</p>

NOTES: **CAR 7/06.** The ANF shall develop and implement a policy to require logging contractors to be certified or trained by local, state, or national programs. (Indicator 7.3.a)

7.4. 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.

Applicability Note to Criterion 7.4: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information). (see also Criterion 8.5)

Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required.

Criterion Level Remarks: Conformance. The forest management plan itself, along with various summaries of its primary elements, are made broadly available in the public arena for stakeholder information and comment.

	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF is required by law to make such a summary available to the public, and has regularly done so through annual monitoring reports, public engagement in the development of EISs in association with the development of project areas, newsletters, news releases, and other media outlets.</p>
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NOTES: None

PRINCIPLE 8. MONITORING AND ASSESSMENT - 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 to Principle 8: On small and medium-sized forests, an informal, qualitative assessment might be appropriate. On large forests and intensively managed forests, formal, quantitative monitoring is required.

<u>Criteria and Indicators</u>	<u>Findings</u>
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8.1 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.

Criterion Level Remarks: Minor non-conformance. Monitoring has been developed over time with progressively more intense and frequent monitoring endeavors. Past efforts in monitoring as guided by the 1986 Plan were lacking, but proposed, new efforts in the current PLRMP are generally well set to allow the ANF to be consistent with FSC certification standards.

<p>8.1.a. Implementation of the management plan is periodically monitored to assess:</p> <ul style="list-style-type: none"> ▪ the degree to which the management vision, goals, and objectives have been achieved ▪ deviations from the management plan ▪ unexpected effects of management activities or other disturbances ▪ social and environmental effects of management activities 	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The ANF implements monitoring activities consistent with the current Allegheny National Forest Monitoring Plan (1986) which states that monitoring is done to determine whether: Forest Plan goals and objectives are being achieved; management prescriptions are applied as directed; if applied prescriptions address management problems, issues, concerns, and opportunities; if significant effects are occurring as predicted; and if costs of implementing the forest plan are as predicted. The current LRMP does not monitor the degree to which management plan vision has been achieved, deviations from the management plan, unexpected effects of management activities or other disturbances, or social and environmental effects of</p>
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	<p>management activities. Also, standards of measurement, frequency, precision, and reliability of sampling are not quantified. (CAR 8/06)</p> <p>The PLRMP (2006) is designed to: assess effectiveness of the Plan to achieve goals, objectives, and desired conditions; compare outputs, services and costs with estimates; evaluate indications of trends or effects; determine environmental effects of management activities, and identify research needed by the National Forest System. It addresses most of the elements in Criterion 8.1.a excepting that it does not identify or evaluate the degree to which the management plan vision has been achieved, deviations from the management plan, unexpected effects of management activities or disturbances, or social effects of management activities (CAR 8/06).</p>
<p>8.1.b. Consistent with the scale and intensity of management, forest owners or managers develop and consistently implement a comprehensive and replicable monitoring plan that includes the rationale for and intensity of monitoring.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>There is no singular monitoring document containing vision, goals, and objectives, deviations from management plans, unexpected effects of management activities, or disturbances or social or environmental effects of management activities for all resources. Rather individual documents dealing with individual resources (e.g., Forest Health) are prepared, implemented, and results reported. Such reports describe location, intensity, and methodologies for monitoring but do not include rationales for such. (CAR 8/06)</p>
<p>NOTES: CAR 8/06: The ANF must enlarge the scope of its monitoring plan to include monitoring proposed in the 2006 Draft PLRMP, and additionally it must evaluate:</p> <ul style="list-style-type: none"> • the degree to which the management plan vision has been achieved; • deviations from the management plan; • unexpected effects of management activities or disturbances; and • social effects of management activities including creation and maintenance of local jobs as well as other impacts to local communities attributable to ANF forest management decisions. <p>Further, all monitoring activities, including intensity and rationale for such monitoring, shall be documented. (Indicators 8.1a, 8.1.b, 8.2.d.3)</p>	
<p>8.2 Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</p> <p>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.</p>	
<p>Criterion Level Remarks: Minor non-conformance. The ANF collects and analyzes data for monitoring yield of timber products (but not NTFPs); growth rates, regeneration and condition (health) of the forest; composition and changes in some but not all classes of flora and fauna; and environmental impacts of operations. Monitoring is not performed for social impacts of harvesting and other operations, but cost, productivity, and efficiency of forest management are monitored.</p>	
<p>8.2.a. Yield of all forest products harvested.</p>	
<p>8.2.a.1. Forest owners or managers maintain records of standing timber and timber-harvest volumes by</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

species and grade.	ANF staff maintains records of standing timber and timber harvest volumes by species and grade.
8.2.a.2. Forest owners or managers maintain records of the yield of harvested non-timber forest products by species, volume, and grade.	Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> ANF staff does not maintain records of yield of harvested NTFPs by species, volume, and grade (CAR 3/06).
8.2.a.3. Unanticipated removal (e.g., theft and poaching) of forest products is monitored and recorded.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> All timber sales are monitored and forest employees continually drive forest roads. Timber theft and other illegal removals are noted, monitored, and acted upon.
8.2.b. Growth rates, regeneration, and condition of the forest.	
8.2.b.1. Growth rates, regeneration, and condition of the forest are monitored at least every 10 years.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Regeneration sites are monitored at the 1 st , 3 rd and 5 th years after harvest to determine regeneration success. At approximate 10-year intervals, the Forest Inventory Analysis, USDA Forest Service, monitors fixed, established plots on the ANF to monitor growth rates. Forest health is monitored at irregular intervals, the last over the 1998-2001 period (Analysis of Forest Health Monitoring Surveys on the Allegheny National Forest).
8.2.b.2. A monitoring system suitable to the scale and intensity of the operation is in place to assess: <ul style="list-style-type: none"> ▪ timber growth, mortality, stocking, and regeneration ▪ stand composition and structure ▪ effects of disturbances to the resources (e.g., management activities, disease, wind, flood, fire, and damage by insects and/or mammals). ▪ abundance, regeneration, and habitat conditions of non-timber forest products ▪ quality and quantity of water ▪ terrestrial and aquatic habitat ▪ ecosystem composition, structures, and functions ▪ soil characteristics ▪ vulnerability to fire and pests 	Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Monitoring identified in 8.2.b.1 provides for assessment of timber growth, mortality, stocking and regeneration, and stand composition and structure. When disturbances other than harvest occur ANF field staff characterize the extent and location(s) of such by ad hoc ground and aerial surveys. Abundance, regeneration, and habitat condition of NTFPs are not monitored (CAR 3/06). Informal surveys are used to evaluate water quality and quantity. Mapping of wetlands and other waterways, and characterization of stands based on successional stage, species composition, interference, pre-harvest inventory of special wildlife habitat components (e.g., monolithic rock aggregations, conifer concentrations, vernal pools) provides timely monitoring of terrestrial and aquatic habitat. Soil mapping conducted prior to, and in conjunction with, identification and location of ecological land types (ELTs) provided an assessment of soil conditions as well as ecosystem composition and associated structures and functions (as does assessment of habitat conditions including standing and down coarse woody debris). Vulnerability to fire is not an issue on the ANF. USDA Forest Service personnel monitor the forest for vulnerability, incidence, and spread of forest pests and pathogens.
8.2.c. Composition and observed changes in the flora and fauna.	
8.2.c.1. Forest owners or managers periodically monitor the forest (at least every five years) for	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<p>changes in major habitat elements and major fauna and for changes in the occurrence of species covered by criterion 6.2.</p>	<p>ANF monitors changes in major habitat elements that are susceptible to change within a 5-year period such as distribution and amount of successional stages, amount of conifer cover, “permanent” wildlife openings, standing and down coarse woody debris (caused by large and extensive wind throw events resulting in significant tree mortality). The entire ANF has been mapped and characterized by successional stage, conifer occurrence, location of wetlands, major streams and rivers by a Geographic Information System (GIS) which is updated as changes occur in individual stands, projects or compartments. USDA Forest Service field staff monitor wildlife openings on a roughly annual basis. Information provided by the Forest Inventory and Analysis approximately every 10 years could be used to evaluate changes in major habitat elements identified above. Requiring this information at a shorter frequency is unreasonable and unattainable. Annual monitoring of deer, bear, coyotes, bobcats, foxes, grouse, and turkeys occurs on portions of the ANF. Infrequent research projects conducted on small portions of the ANF provide partial estimates of amphibian, songbird, and small mammal communities.</p> <p>The 1986 Plan calls for annual monitoring of RT&E plant and animal species. Bald eagles are monitored yearly as are Indiana bats, but other listed threatened/endangered species have not been found on the ANF, making it impossible to monitor them.</p>
<p>8.2.d. Environmental and social impacts of harvesting and other operations.</p>	
<p>8.2.d.1. The environmental impacts of site-disturbing activities are assessed after their completion (e.g., road construction and repair, harvesting, site preparation).</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>At the completion of site-disturbing activities steps taken to minimize or avoid environmental impacts and actual impacts are assessed: road culverts, water bars, bridges and ditches are examined for run-off, erosion, and undermining; skid trails are assessed for rutting and compaction; haul roads are assessed for impact on crowning, landings are examined for efficacy of practices designed to avoid erosion (mulching, seeding), and drift from herbicide application is assessed.</p>
<p>8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest road system.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>A program for monitoring condition and environmental impacts of the road system is in place.</p>
<p>8.2.d.3. The creation and/or maintenance of local jobs is monitored.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>The creation and/or maintenance of local jobs is generally not monitored beyond records for personnel employed by the ANF (CAR 8/06). One important exception to this generality is the USDA Forest Service’s engagement in periodic 5-year assessment of recreational activities on its units, including the ANF. This study, called the National Visitor Use Monitoring</p>

	study (NVUM) includes attendance and economic impact analysis, which tracks employment in the surrounding area related both directly and indirectly to recreation.
8.2.d.4. Public responses to management activities are monitored.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The ANF seeks public input prior to and during management activities and to prepare and publish responses to this written or verbal input. The process includes preparation and mailing of announcements and documents to stakeholders regarding impending management activities, seeking input via advertised public meetings, and keeping a record of communications (oral and written) received from stakeholders. These records are published and are a part of the public record.
8.2.d.5. Forest owners or managers invite tribal representatives and other affected parties to monitor the management of sites of special significance to determine the adequacy of existing management prescriptions.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Tribal representatives are invited to observe and comment on adequacy of management of sites of special significance to determine the adequacy of existing protection (also, see findings associated with Criterion 3.1).
8.2.e. Cost, productivity, and efficiency of forest management.	
8.2.e.1. Forest owners or managers monitor the costs and revenues of management.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The ANF keeps records of expenditures and revenues of all forest operations and monitors (and audits) them annually.
NOTES: See CAR 3/06 associated with Criterion 5.2. See CAR 8/06 associated with Criterion 8.1.	
8.3. 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."	
Criterion Level Remarks: Conformance.	
<i>Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required.</i>	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The tree (stump) or landing is the "forest gate": Once harvested forest products leave the landing, they leave the jurisdiction of the ANF. There is a solid record of documentation of species, grade, and volume of forest products by payment unit removed from the landing. This documentation is retained in the Supervisor's Office at the ANF.
NOTES: None	
8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.	
Criterion Level Remarks: Conformance.	
8.4.a. Findings from monitoring of discrepancies between outcomes (i.e., yields, growth, ecological changes) and expectations (i.e., plans, projections, anticipated impacts) are documented. Monitoring results are implemented in periodic revisions of the management plan, policy and procedures.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Both current and Draft Management plans call for incorporation of monitoring into implementation and revision of the management plan. Evidence that monitoring results are implemented into periodic

	revisions include the Plan amendments that were developed since 1986, and efforts at Plan revision. For example, the ANF developed a detailed "Analysis of the Management Situation" as a basis for "need for change" in support of Plan revision (see www.fs.fed.us/r9/forests/alleggheny/projects/forest_plan_revision/documents/). Many elements of monitoring are synthesized in specific resource and management areas (e.g., forest vegetation management) as a basis for change in planning and future management activities.
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NOTES: None

8.5. 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.

Applicability Note to Criterion 8.5: Forest owners or managers of private forests may withhold proprietary information (e.g., the nature and extent of their forest resource base, marketing strategies, and other financial information).

Criterion Level Remarks: Conformance. The ANF has provided monitoring reports in the past, but discontinued them in 2001 as staff time since then has been consumed with Forest Plan revision.

8.5.a. An up-to-date monitoring summary is maintained and is made available on request, either at no cost or at a nominal price.

Conformance with Indicator: Yes No N/A

According to the requirements of the FOIA, the ANF must make all records, including results of monitoring, available to the public upon demand. Additionally, the ANF prepares an annual monitoring report (see www.fs.fed.us/r9/forests/alleggheny/publications/monitoring_reports/). There have been 15 reports to date since the 1986 Forest Plan was approved, with the last report published in 2001 (**OBS 8/06**). There have been no reports since 2001 as nearly all ANF staff has been fully dedicated to Forest Plan revision. In addition to monitoring reports, the ANF provides to the public an annual report that summarizes the previous year's activities and accomplishments (see www.fs.fed.us/r9/forests/alleggheny/publications/annual_reports/).

NOTES: **OBS 8/06:** With Plan revision nearly at an end, the ANF should reconstitute the annual monitoring reports that it shares with the public on the results of monitoring the implementation of the ANF's PLRMP. (Indicator 8.5.a)

PRINCIPLE 9. MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS - 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.

<u>Criteria and Indicators</u>	<u>Findings</u>
<p>9.1. 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.</p> <p><i>Applicability note to Criterion 9.1: Forest and community types in the Appalachia region that have HCVF attributes include, but are not limited to:</i></p> <ul style="list-style-type: none"> ▪ Old-growth oak-hickory (<i>Quercus spp.-Carya spp.</i>) forests on the Cumberland Plateau and on the Highland Rim of Tennessee ▪ Mixed mesophytic cove sites on the Cumberland Plateau ▪ Limestone glades in Tennessee and Kentucky 	

<ul style="list-style-type: none"> ▪ Pocosins (evergreen shrub bogs) and other mountain bogs in Virginia, Tennessee, and North Carolina ▪ other forest and woodland plant community types listed by NatureServe as critically endangered, endangered, or vulnerable (G1-G3, N1-N3, and S1-S3) in the region, unless further refined by consultations with heritage programs, local native plant societies, local experts, and ENGOS; ▪ un-entered old-growth stands and intact old-growth forests; ▪ roadless areas (areas without roads, logging roads, or skid trails), larger than 500 acres; ▪ habitats for threatened or endangered species; ▪ unique and sensitive geophysical features, such as caves and rock outcrops; and ▪ forested wetlands or glades, such as springs, fens, and seeps. ▪ Spruce-fir (<i>Picea rubens</i>-<i>Abies fraseri</i>) forests in southern Appalachia ▪ Atlantic white-cedar (<i>Chamaecyparis thyoides</i>) stands Red spruce (<i>Picea rubens</i>) forests in central Appalachia <p><i>Owners and managers of small forests that practice low-intensity forestry may meet this requirement with brief, informal assessments. More extensive and detailed assessments (e.g., formal assessments by scientists) are expected by owners and managers of large forests and/or those who practice more intensive forestry (see Glossary) management.</i></p>	
<p>Criterion Level Remarks: Conformance. Managers on the ANF follow a comprehensive, thorough process for identifying, mapping, protecting, and enhancing HCVF attributes; the process includes identifying (and conserving such areas when they receive the wilderness designation) potential wilderness areas.</p>	
<p>9.1.a. Attributes and locations of High Conservation Value Forests are determined by (see “applicability to old-growth” note in 6.3):</p> <ul style="list-style-type: none"> ▪ identification of globally scaled HCVF attributes that may be present in the forest ▪ identification and description of regionally and locally scaled HCVF attributes and areas that may be present in the landscape and/or certified forest ▪ broadly based consultations with stakeholders and scientists ▪ public review of proposed HCVF attributes and areas ▪ integration of information from consultations and public review into proposed HCVF delineations delineation by maps and habitat descriptions 	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>In characterizing its forest land base, the ANF has identified, mapped, and protected several globally, regionally, and locally scaled HCVF attributes. Those listed apply equally to a global, regional, and local scale. They include old-growth forest in the Tionesta Scenic and Research Natural Areas and Heart’s Content; 8,663 acre roadless Hickory Creek Wilderness Area; Minister Creek and Jake’s Rocks aggregations of monolithic rocks; and Buzzard Swamp. Habitats for two federally-listed endangered/threatened species (Indiana bat and bald eagle, respectively) are widely scattered and available across the ANF. Bald eagle nest sites are identified and buffered. Foraging sites (e.g., forest openings and open corridors above streams, lakes, and ponds) and roosting sites (e.g., trees with large crevices/loose bark located in areas partially open to sunlight and warmth) for Indiana bats are abundant and well-distributed across the ANF. As part of the required consultative process initiated by project level timber sales, the ANF staff are mandated to consult broadly with stakeholders, scientists, and local experts. Public review, input, and response to inputs are also mandated for factors including HCVFs. All identified HCVF attributes are mapped and described. The process does not label HCVF attributes as such (OBS 9/06).</p>
<p>AC 9.1.1. By policy and action, managers of National Forests shall demonstrate compliance with Section 2(c) of the Wilderness Act and the Wild and Scenic Rivers Act in the course of identifying and designating HCVF.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Managers on the ANF comply with Section 2c of the Wilderness Act in the course of identifying and designating wilderness areas and other HCVF areas as mandated by federal law. The ANF completed a thorough evaluation of potential additional wilderness as</p>

	<p>part of their Forest Plan Revision. This evaluation is detailed in Appendix C of the FEIS. All large continuous blocks of land were included in the evaluation to determine if they had characteristics for potential inclusion in the wilderness system. Included within this analysis were all of the areas recommended by the organizations that submitted comments on wilderness consideration. Numerous criteria were considered in this analysis. Four areas were identified for further evaluation for possible recommendation as wilderness study areas. Two of these areas - Minister Valley (9,145 acres) and Chestnut Ridge (5,063 acres) - are recommended as wilderness study areas.</p> <p>Currently there are 87 miles of the Allegheny River and 52 miles of the Clarion River included in the National Wild and Scenic River System. As a part of the Forest Plan Revision, the ANF conducted a comprehensive evaluation of rivers and river segments that could be added to the Wild and Scenic River System. The result of this evaluation was that no additional rivers are eligible. This analysis is documented in Appendix D of the FEIS.</p>
<p>AC 9.1.2. National Forest managers review and consider use of existing HCVF planning tools (e.g. Proforest HCVF Tool Kit, Canadian National Framework for HCVF) in the development of a process for identifying HCVF.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF forest managers did not review or use existing HCVF planning tools in existing processes used to (comprehensively) identify HCVFs. However, the process utilized to identify such attributes was comprehensive, thorough, and complete.</p>
<p>NOTES: OBS 9/06: To facilitate information-sharing and conformance to FSC standards, the ANF staff should develop a comprehensive process for identifying, categorizing, and defining protection for HCVF attributes identified on the ANF in an inclusive appendix to the PLRMP which should include maps and loci of HCVFs. (Indicator 9.1.a)</p>	
<p>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	
<p>Criterion Level Remarks: Conformance. Although ANF staff does not explicitly label HCVF attributes as such, it does seek input from state (e.g., PNDI, PGC, Pennsylvania Fish and Boat Commission) and local and regional stakeholders, scientists, and naturalists to confirm that it has identified HCVF attributes and correctly identified their loci within the Forest.</p>	
<p>9.2.a. Consultations are held with stakeholders and scientists to confirm that proposed HCVF locations and their attributes have been accurately identified. On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions and delineations.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Current HCVF attributes and locations (e.g., old-growth areas, wilderness/roadless areas, monolithic rock aggregates, unique wetlands) are well-established and recognized as such by interested publics, including scientists and local experts. Identification, location, and protection of as yet unidentified HCVF attributes which may be located within project areas scheduled for timber harvest or other management operations is promulgated by consultations with stakeholders, scientists, and natural resource entities (e.g., Pennsylvania Natural Diversity Index, a natural heritage organization, PGC, the Pennsylvania Fish and Boat</p>

	Commission) and by a mandated process of public review, input, and USDA Forest Service response to input regarding proposed management activities.
NOTES: None	
<p>9.3 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.</p>	
<p><i>Applicability Note to Criterion 9.3: The applicability of the precautionary principle and the consequent flexibility of forest management vary with the size, configuration, and tenure of the HCVF:</i></p>	
<p><i>a) <u>More flexibility</u> is appropriate where HCV forest is less intact, larger in area, has a larger area-to-perimeter ratio, and its tenure is assured over the long term.</i></p>	
<p><i>b) <u>Less flexibility</u> is appropriate where HCV forest is more intact, covers a smaller area, has a smaller area-to-perimeter ratio, and future tenure is uncertain based on social considerations, and is consistent with Principle 3.</i></p>	
<p>Criterion Level Remarks: Minor non-conformance. The ANF protects old-growth forests from active management, excepting development of privately-owned minerals, and manages for the long term to assure quality and quantity of HCVF attributes are maintained and enhanced. There is no coordination of efforts with managers of abutting forestlands to identify or protect HCVF attributes within abutting forestlands. Public summaries in the PLRMP describe management policies but only limited protection policies for HCVF attributes.</p>	
<p>9.3.a. The precautionary principle requires that no active management be conducted in un-entered and/or intact old-growth forests (see Glossary), unless it is necessary to maintain or enhance the HCVF values, which includes old-growth attributes. Tribal lands are excepted from this provision</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>No active forest management activities are allowed or conducted within the Tionesta Scenic and Research Natural Area and Heart's Content old-growth areas excepting clearance of roads blocked by fallen trees (the part of the tree covering the road is cut out and laid alongside the tree on one side or other of the road). However, subsurface mineral rights were not obtained by the USDA Forest Service when the Tionesta Scenic and Research Natural Areas were purchased in the 1920s: subsequently, extraction of oil and gas, and attendant vehicular travel to service well-heads and gas lines, and transport of extracted oil are allowed and practiced. Recently the ANF purchased subsurface mineral rights to the TRNA: future development and extraction are prohibited, but existing wellheads are serviced and maintained for extraction as they are on the TSA. While these activities detract from the "wilderness" experience, they do not affect the composition, structure, or ecological function of old-growth.</p>
<p>9.3.b. Stands and forests designated as HCVFs, which have been entered for timber harvest, are managed over the long term to assure that both the quality of their HCVF attributes and their area are maintained.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>ANF managers do not specifically identify as "HCVF" stands and forests that contain HCVF attributes, but they do offer them full protection. In stands and forests with actual or potential HCVF attributes that include timber harvest as part of an array of management options (MAs 6.1, 6.3, 8.1-8.6, and 9.1) only timber harvest designed to enhance the HCVF attributes, or unless associated with development of private mineral ownership, is permitted.</p>
<p>9.3.c. Forest owners and managers of HCVFs (forests and/or stands) coordinate conservation efforts with</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>

<p>owners and managers of other HCVFs in their landscape.</p>	<p>ANF managers do not identify HCVF attributes that may occur on abutting forestlands, nor do they attempt to coordinate conservation efforts with owners and managers of other HCVF attributes that may occur on abutting forestlands (CAR 9/06).</p>
<p>9.3.d. The public summary of the management plan contains management and protection policies for the HCV areas that are precautionary, readily assuring that the defining conservation values will be maintained or enhanced.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The 1986 Management Plan contains no public summary. The public summary for the PLRMP identifies management policies for some of the areas containing HCVF attributes and identifies one protection policy (prohibition of construction of roads in Management Areas 5.0,7.2, 7.3, 8.2, 8.3, 8.5, 2.2), excepting for private mineral development) but no others. (OBS 10/06).</p>
<p>NOTES: CAR 9/06: The ANF shall develop and implement a written protocol for assessing presence of HCVF attributes on abutting forestlands. Additionally, ANF managers shall pursue and document coordination of conservation efforts with owners and managers of HCVFs on abutting forestlands, if any are discovered during the assessment process. (Indicator 9.3.c) OBS 10/06: Lack of a formal process for identifying, categorizing, and defining protection for HCVF attributes (see Observation 6/06) hinders development and implementation of protection policies and protocols for HCVF attributes, should they be needed. ANF managers should review identified HCVF attributes and determine whether protection policies other than preventing construction of forest roads in some areas with HVCF attributes is needed, and if so, protective policies should be enumerated and included in the PLRMP, including the public summary. (Indicator 9.3.d)</p>	
<p>9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain and enhance the applicable conservation attributes.</p>	
<p>Criterion Level Remarks: Minor non-conformance. There is no annual monitoring to assess effectiveness of measures employed to maintain and enhance applicable conservation attributes.</p>	
<p><i>Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required.</i></p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Measures employed by the ANF for maintenance and enhancement of applicable conservation attributes consist of prevention of vehicular entry into areas with HCVF attributes (where considered necessary), prohibition of construction of forest roads into areas identified with old-growth or tending to old growth characteristics, irregular (but more often than annual) visits by field personnel to check for integrity of gates preventing entry into old-growth areas and illegal bypassing of gates allowing vehicular traffic into old-growth or wilderness areas, and observation of public adherence to buffer zones established around bald eagle nests. However, there is no protocol or policy for monitoring effectiveness of the steps taken above to protect, maintain, and enhance HCVF attributes. As stated for other criteria for Principle 9, lack of formal identification of existing HCVF attributes hinders comprehensive identification of attributes needing protection, measures needed to protect them, and monitoring to insure that protection is maintained (CAR 10/06).</p>
<p>NOTES: CAR 10/06: ANF managers shall develop and implement a protocol and policy for monitoring the effectiveness of measures to protect, maintain, and enhance identified HCVF attributes. (Criterion 9.4)</p>	

PRINCIPLE 10. PLANTATIONS - 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.

Applicability Note to Principle 10: Plantations are not prevalent in the Appalachian Region and do not represent the preferred method of managing a typical Appalachian forest. While adjoining regions may contain ecosystems that have been historically managed with plantations and landowners may have land in more than one region, plantation management in the Appalachian region is only appropriate where they already exist, and for restoration purposes.

Principle Level Remarks: While management objectives of planted stands (approximately 4,000 hectares, circa 1930) were not explicitly stated in the 1986 Land and Resource Management Plan, needed objectives are part of project area tactical plans. A general philosophy of allowing planted stands to revert to natural forest conditions was discerned during office interviews with ANF staff and field assessment of select plantations. Consequently, these planted areas do not appear to qualify as plantations under the FSC definition, and Principle 10 as a whole is not applicable.

Criteria and Indicators	Findings
10.1. The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.	
Criterion Level Remarks: Not applicable.	
10.1.a. The objectives and management of each plantation are described in the forest management plan.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable
10.1.b. Environmental safeguards for the plantation's management are clearly stated in the management plan (e.g., monitoring and control plans for invasive species).	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.1.c. The forest owner or manager demonstrates a systematic pattern of implementing the plantation management objectives in the management plan.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10. 1. DOD/DOE 1. Plantations are restored to managed natural forest conditions.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
NOTES:	
10.2. The design and layout of plantations should promote the protection, restoration, and conservation of natural forests, and not increase pressures on natural forests. Wildlife corridors, streamside zones, and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the plantation, consistent with the scale of the operation. The scale and layout of plantation blocks shall be consistent with the patterns of forest stands found within the natural landscape.	
Criterion Level Remarks: Not applicable. Refer to Principle level remarks.	
10.2.a. Plantations do not replace, endanger, or otherwise diminish the ecological integrity of existing forests.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> The ANF does not establish plantations. Planting was done only at a small-scale to enhance wildlife habitat and add native forest diversity elements through enrichment activities.
10.2.b. Plantation layout is sensitive to slope, aspect, and the potential for soil erosion. The degradation and erosion of soil are minimized.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.2.c. The design and layout of plantations to be	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

moved toward more natural conditions are adequate to achieve that objective.	Not applicable.
10.2.d. Where plantations exist, they are managed to improve natural habitats and to integrate the plantation area within the surrounding natural landscape. The plans and methods to restore habitats are determined by the scale and intensity of the operation, spatial patterns (e.g., the contiguity of the forest), and other relevant landscape factors.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.2.e. Even-aged harvests lacking within-stand retention are limited to forty acres or less in size, unless a larger opening can be justified by scientifically credible analyses (see Glossary).	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.2.f. Regeneration in previously harvested areas reaches a mean height of at least ten feet or achieves canopy closure (see Glossary) before adjacent areas are harvested. Buffers between harvest units are arranged to allow contiguous populations of native species.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
NOTES:	
10.3. Diversity in the composition of plantations is preferred, so as to enhance economic, ecological, and social stability. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes, and structures.	
Criterion Level Remarks: Not applicable.	
10.3.a. Forests containing plantations are managed to create and maintain structural and species diversity that results in viable wildlife habitat and long-term soil maintenance and replenishment.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable. Silvicultural interventions create and maintain structural and species diversity, viable wildlife habitat, and long-term soil maintenance and replenishment.
10.3.b. Management of plantations is planned in a way that generates and maintains long-term employment.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
NOTES:	
10.4. The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives. In order to enhance the conservation of biological diversity, native species are preferred over exotic species in the establishment of plantations and the restoration of degraded ecosystems. Exotic species, which shall be used only when their performance is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.	
Criterion Level Remarks: Not applicable.	
10.4.a. Tree species are well suited for the site's elevation, aspect, slope, hydric conditions, and soil conditions.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Reforestation activities by tree plantings are not employed by the ANF, except at small scales and only to enrich natural forest conditions, rather than establish plantations per se.
10.4.b. The rationale for the selection of species is documented in the forest management plan. Also documented in the plan is the fact that any introduced species are non-invasive, do not diminish biodiversity, and are not hosts for exotic pathogens.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.4.c. Planting of non-invasive, exotic and/or	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

non-native species is allowed for purposes of site remediation and experimental purposes, and based on credible scientific analysis. Justification for such plantings is provided (see Criterion 9.4.). If non-invasive exotic plant species are used, their provenance and the location of their use are documented, and their ecological effects are monitored.	Not applicable.
10.4.d. Potentially invasive plant or animal species are not introduced.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
NOTES:	
10.5 A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.	
Criterion Level Remarks: Not applicable.	
10.5.a. Plantations are integrated over a wide spatial scale with surrounding landscapes to maintain an ecological balance between plantations and natural forests, as well as between even-aged and uneven-aged stands.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Since the ANF does not engage in reforestation practices with stand-scale tree planting, this Criterion was not applicable.
10.5.b. The ratio of plantations to natural and semi-natural forests (see Glossary), as well as the plantation's spatial distribution, maintains and/or restores a diversity of community types, wildlife habitats, and ecological functions similar to the mosaic of native forests.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.5.c. A percentage of the total forest management area is maintained as and/or restored to natural and semi-natural forest cover. The minimum required percentage is: - for 100 acres or less, at least 10 percent. - for 101 - 1,000 acres, at least 15 percent. - for 1,001 to 10,000 acres, at least 20 percent. - for > 10,000 acres, at least 25 percent	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.5.d. Areas of forest and/or plantation to be restored to natural conditions are chosen through a landscape analysis that focuses on enhancing ecological integrity and habitat connectivity.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
NOTES:	
10.6. Measures shall be taken to maintain or improve soil structure, fertility, and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long-term soil degradation or adverse impacts on water quality, quantity, or substantial deviation from stream course drainage patterns. (See Criterion 6.5. and its indicators.	
<i>Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required.</i>	
Criterion Level Remarks: Not applicable.	
<i>Note: The Working Group considers this Criterion sufficiently explicit and measurable. Indicators are not required.</i>	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Since the ANF does not engage in reforestation practices with stand-scale tree planting, this Criterion was not applicable.

NOTES:	
10.7 Measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire, and invasive plant introductions. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers. Plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7.	
Criterion Level Remarks: Not applicable.	
10.7.a. The management plan includes strategies to control pests, wild fires, and invasions of plants.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Since the ANF does not engage in reforestation practices with stand-scale tree planting, this Criterion was not applicable.
10.7.b. Pests (e.g., weeds, insects, and disease) are managed by the principles of integrated pest management. Management activities are implemented by qualified personnel and documented.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.7.c. Forest managers, through their policies and actions and consistent with criterion 6.6, demonstrate a commitment to minimize the use of chemical pesticides and fertilizers.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
NOTES:	
10.8 Appropriate to the scale and diversity of the operation, monitoring of plantations shall include regular assessments of potential on-site and off-site ecological and social impacts (e.g., natural regeneration, effects on water resources and soil fertility, and impacts on local welfare and social well-being), in addition to those elements addressed in principles 8, 6, and 4. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access.	
Criterion Level Remarks: Not applicable.	
10.8.a. The provisions of monitoring required in Principle 8 (including an assessment of local welfare and social well-being) apply to plantations as well as to natural forests.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Since the ANF does not engage in reforestation practices with stand-scale tree planting, this Criterion was not applicable.
10.8.b. Consistent with Criteria 6.9 and 10.4, forest owners and managers select species for planting only after local trials and credible scientific evidence demonstrate their suitability to the site.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
10.8.c. Consistent with P2 and P3 customary use rights, forest owners and managers establish plantations on lands only where ownership and use rights have been settled.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Not applicable.
NOTES:	
10.9 Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification. Certification may be allowed in circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly for such conversion.	
Criterion Level Remarks: Not applicable.	
10.9.a Plantation stands established through conversion after 1994 may be considered for certification if a plan to restore these stands to natural forest conditions is being implemented.	Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Since the ANF does not engage in reforestation practices with stand-scale tree planting, this Criterion was not applicable.

NOTES:

APPENDIX IV: Chain of Custody Standard Conformance Checklist (confidential)

Note: The following section is for the evaluation of FMO’s without processing facilities. All operations with primary and secondary processing facilities must be evaluated using the complete chain of custody standard and a separate report is required for each processing facility.

Definition of Forest Gate: The forest gate was defined primarily as the standing trees via timber sales from stands (stumpage), but can also be a landing.

Chain of Custody Criteria	Yes	No	NA	Explanatory notes/ CAR or OBS	CAR
CoC 1: FMO maintains effective control of forest products from standing timber until ownership is transferred at the forest gate.	X			All products produced under a given harvest contract originate within the harvest unit boundaries. All ANF lands are included in the scope of this evaluation. (NOTE: This is a test evaluation project and a certificate will not be issued to the ANF)	
CoC 2: System has procedures for handling non-certified wood which originate outside the scope of this certificate. Note: If no outside wood is utilized mark as NA			X	All ANF lands are included in the scope of this test evaluation. The ANF only sells products from its lands. (NOTE: This is a test evaluation project and a certificate will not be issued to the ANF)	
CoC 3: Risk of contamination of certified wood and Non timber forest products by non certified products is controlled.	X			At all stages of harvest, and certainly with the timber sale area with stumpage, there would be no risk of co-mingling products harvested from properties other than the ANF. (NOTE: This is a test evaluation project and a certificate will not be issued to the ANF)	
CoC 4: A system exists that ensures that certified forest products are clearly distinguished from non-certified products through marks or labels at all stages of processing to final sales at the forest gate?			X	The ANF would not have any non-certified products at stages of processing before the forest gate. (NOTE: This is a test evaluation project and a certificate will not be issued to the ANF)	
CoC 5: A system exists to include FMO FSC certificate code and certified description of products on sales and shipping documentation (e.g. waybill and invoices).		X		A system does not exist to include FMO FSC certificate code and certified description of products on sales and shipping documentation (e.g., waybill and invoices)	CAR 11/06

CoC 6: If the FMO sells mixed products that combine certified and non certified wood, procedures exist that demonstrate compliance with FSC minimum thresholds and record keeping requirements. If no mixed products are sold mark as NA.	X			The ANF does not sell mixed products.	
CoC 7: Volume and source data on loads of raw material (certified logs) is available (i.e. scaled, inventoried, measured) in the forest, in transport, and at intermediate storage yards, processing and distribution centers controlled by FMO.	X			The ANF maintains records of harvest volumes as hardwood or softwood pulp/chips or species and grade of sawtimber for each harvest unit, and the harvesting contractor was recorded for each harvest unit.	
CoC 8: Record keeping system exists that maintains certification related documents (sales, shipping and other applicable documentation). Documents are kept in a central location and/or easily available for inspection.	X			All records are maintained at the ANF Supervisor's Office and the Forest Service Regional Office. (NOTE: This is a test evaluation and a certificate will not be issued to the ANF)	
CoC 9: A system exists to ensure that all use of the FSC/SW trademarks, as well as public information related to certification is submitted to SmartWood for review and approval.			X	ANF has not agreed to obtain approval from SW prior to the use of SW and FSC trademarks, but, if this were an actual certification assessment, it is expected they would agree that any public information related to certification be submitted to SW for review and approval. . (NOTE: This is a test evaluation and a certificate will not be issued to the ANF)	CAR 11/06
CoC 10: FMO has procedures for compiling annual report on sales to SmartWood containing monthly sales in terms of volume of each certified products to each customer. For small operations copies of invoices/waybills are sufficient.	X			The ANF's computerized database can produce volume reports by harvest unit, product, and purchaser.	

CAR #: 11/06	Reference Standard #: CoC 5, CoC 9
Non-conformance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	The ANF does not have a formal CoC. While key elements associated with control of forest products to and at the forest gate and associated accounting of products sales are well developed, the ANF would need to develop new CoC procedures.
Corrective Action Request: ANF shall develop, document and apply procedures for chain-of-custody. This system should include: <ul style="list-style-type: none"> a system to include FMO FSC certificate code and certified description of products on sales and shipping documentation (CoC 5) a system to ensure that all use of the FSC/SW trademarks, as well as related public information, are submitted to SmartWood for review and approval (CoC 9) 	
Deadline for completion of corrective action: Not applicable.	

APPENDIX VI: List of all visited sites (confidential)

District	General Area	Auditors	Type of site / short description of site
Bradford	Route 321	Nowak, Taylor, Grado, deCalesta	Oil and gas well head and access road
Bradford	Kinzua Quality Deer Management Area	Nowak, Taylor, Grado, deCalesta	Special management area focused on deer-ecosystem management using focused hunting via DMAP; examined two stands—thinned and shelterwood removal
Bradford	Kinzua Quality Deer Management Area/FR176	Nowak, Taylor, Grado, deCalesta	Forest road stream crossing in conjunction with a recently worked oil and gas well head
Bradford	Tracy Ridge Campground (developed)	Nowak, Taylor, Grado, deCalesta	Campground site including picnic areas and trails—oak forest type
Bradford	Wolf Pidgeon Timber Sale	Nowak, Taylor, Grado, deCalesta	Shelterwood seed cut (441-27) and 2-age cut (1 st cut) with prescribed burn, enrichment planting with white pine, fence and rock-feature inclusion
Bradford	Wolf Pidgeon Timber Sale	Nowak, Taylor, Grado, deCalesta	Administrative Study Area #5—prescribed burn
Bradford	Wolf Pidgeon Timber Sale	Nowak, Taylor, Grado, deCalesta	Rock borrow pit along Kinzua Height Township Road—support oil and gas development
Marienville	Native American Heritage Resource Site	Nowak, Taylor, Grado, deCalesta	Russell City Earth Works (Fort), capped oil and gas well and pad
Marienville	He Ha Timber Sale	Nowak, Taylor, Grado, deCalesta	Shelterwood seed cut (uncut vs. marked); riparian zone; salvage thinning; wildlife opening (Payment Unit 4, Compartment 703, Stand 22; Payment Unit 3, Compartment 703, Stand 39)
Marienville	Route 66 ATV Trail Head	Nowak, Taylor, Grado, deCalesta	Parking area; ATV trail; pit bathroom facilities
Marienville	He Ha Timber Sale/Spring Creek EIS	Nowak, Taylor, Grado, deCalesta	Thinning (lop and scatter slash near Route 66/pond); shelterwood removal—marked, uncut (Payment Unit 26, Compartment 703, Stand 64; Payment Unit 2, Compartment 703, Stand 41)
Marienville	Quad Sale/Spring Creek EIS	Nowak, Taylor, Grado, deCalesta	Salvage thinning (n=3); shelterwood seed cut (Payment Unit 8, Compartment 711, Stand 36; Payment Unit 7, Compartment 711, Stand 35; Payment Unit 10 and 11)
Marienville	Little Mill Creek Sale/East Side EIS	Nowak, Taylor, Grado, deCalesta	FR458 Disabled Hunter Area; salvage thinning; shelterwood seed cut (Payment Unit 21, Compartment 853; Stand 2; Payment Unit 20; Compartment 853; Stand 45)
Bradford	Sheriff West Timber Sale/Duck Sheriff EIS	Nowak, Taylor, Grado, deCalesta	Shelterwood removal (n=2); two-age; thinning (Payment Units 2, 3, 9, and 25)

Bradford	Sheriff Central Timber Sale/Duck Sheriff EIS	Nowak, Taylor, Grado, deCalesta	Two-age 1 st cut; uneven-aged silviculture—group selection; thinning; shelterwood seed cut (n=4); thinning (Payment Units 1, 2, 3, 6, 7, 17, 18, 20)
Bradford	Sacketts oil field	Nowak, Taylor, Grado, deCalesta	A complex of oil and gas well heads and pads, access roads, and processing and pumping facilities
Bradford	Hearts Content Scenic Area	Nowak, Taylor, Grado, deCalesta	White pine-eastern hemlock-hardwood old-growth forest
Bradford	Tionesta Scenic Area	Nowak, Taylor, deCalesta	Hemlock-hardwood old-growth
Bradford	East Branch Tionesta Creek	Nowak, Taylor, deCalesta	Salvage two-age (n=2) (Payment Units 9 and 10)
Bradford	South Branch Tionesta Creek	Nowak	Hemlock thinning (n=2); shelterwood seed cut (marked) (Payment Units 3, 10, and 11)
Bradford	Route 948	Nowak	Thinned red pine plantation
Bradford	Tionesta Research Natural Area	deCalesta	Hemlock-hardwood old-growth
Bradford	Hickory Creek Wilderness Area	deCalesta	Second-growth hardwood wilderness area

APPENDIX VII: Detailed list of stakeholders consulted (confidential)

List of FMO Staff Consulted

There were 155 ANF employees contacted; however, 12 did not want to be listed in the appendix titled “List of FMO Staff Consulted.”

Name	Title	Contact	Type of Participation
Adams, Kit J.	Forestry Technician	kadams@fs.fed.us	Public notice, e-mail survey
Albaugh, Kathy A.	Human Resources Specialist	kalbaugh@fs.fed.us	Public notice, e-mail survey, office interaction
Antalosky, Mike T.	Natural Resources Specialist	mantalosky@fs.fed.us	Public notice, e-mail survey
Apgar, James	Environmental Coordinator	japgar@fs.fed.us	Public notice, e-mail survey, introductory meeting, field interaction
Archer, Doug	Lead Forestry Technician	darcher@fs.fed.us	Public notice, e-mail survey
Austin, Mary L.	Information Receptionist	maustin@fs.fed.us	Public notice, e-mail survey
Barandino, Vincente L	Civil Engineer	vbarandino@fs.fed.us	Public notice, e-mail survey
Bickings, Gregory A.	Visitor Information Assistant	gbickings@fs.fed.us	Public notice, e-mail survey
Bowley, Curtis	Forester	cbowley@fs.fed.us	Public notice, e-mail survey
Bowmaster, Ralph M.	Lands Surveyor	mbowmaster@fs.fed.us	Public notice, e-mail survey, office interaction
Boyd, James L.	Forestry Technician	jamesboyd@fs.fed.us	Public notice, e-mail survey, field interaction
Burd, Carol D.	Natural Resources Specialist	cburd@fs.fed.us	Public notice, e-mail survey
Burd, Steve	Law Enforcement Officer	sburd@fs.fed.us	Public notice, e-mail survey
Byerly, Fred L.	Forestry Technician	fbyerly@fs.fed.us	Public notice, e-mail survey
Cartwright, Randall S.	Archeologist	randallcartwright@fs.fed.us	Public notice, e-mail survey
Catignani, Tanya E.	Resource Info Specialist	tcatignani@fs.fed.us	Public notice, e-mail survey
Chopp, John A.	Forestry Technician	jachopp@fs.fed.us	Public notice, e-mail survey
Clavin, Nancy	Resource Assistant	nclavin@fs.fed.us	Public notice, e-mail survey

Clevenger, Herb	Information Assistant	hclevenger@fs.fed.us	Public notice, e-mail survey
Conn, Mark W.	Outdoor Recreation Planner	mwconn@fs.fed.us	Public notice, e-mail survey
Conn, Melissa A.	Grants and Agreements	mconn@fs.fed.us	Public notice, e-mail survey
Connelly, William J.	Program Analyst	wconnelly@fs.fed.us	Public notice, e-mail survey, office interaction, stakeholder meeting, debriefing meeting
Cotterman, David O.	Forestry Technician	dcotterman@fs.fed.us	Public notice, e-mail survey, field interaction
DeMarco, Donna J.	Information Technologist	ddemarco@fs.fed.us	Public notice, e-mail survey
DeMarco, Lois M.	Supervisory Gen Biologist	ldemarco@fs.fed.us	Public notice, e-mail survey, introductory meeting, office interaction, field interaction, stakeholder meeting, debriefing meeting
DeMarco, Randy L.	Forestry Technician	rdemarco@fs.fed.us	Public notice, e-mail survey, field interaction
Dixon, Jerry	Forestry Technician	jldixon@fs.fed.us	Public notice, e-mail survey
Doane, Edward	Forester	edoane@fs.fed.us	Public notice, e-mail survey
Dougherty, James J.	Res. Adminst	jdougherty@fs.fed.us	Public notice, e-mail survey
Drake, Dave A.	Resource Info Specialist	dadrake@fs.fed.us	Public notice, e-mail survey
Drake, Laura E.	GIS Support Specialist	ldrake@fs.fed.us	Public notice, e-mail survey
Dube, Dennis A.	Forestry Technician	ddube@fs.fed.us	Public notice, e-mail survey
Dunn, Gary G.	Archeologist	gdunn@fs.fed.us	Public notice, e-mail survey
Durner, Randall A.	Timber Contracting Officer	rdurner@fs.fed.us	Public notice, e-mail survey, introductory meeting, field interaction
Dutchess, Scott	Wastewater Plant Operator	sdutchess@fs.fed.us	Public notice, e-mail survey, office interaction
Fallon, Rob	District Ranger	rfallon@fs.fed.us	Public notice, e-mail survey, field interaction, debriefing meeting

Farrell, Thomas J.	Forestry Technician	tfarrell@fs.fed.us	Public notice, e-mail survey
Fish, Robert L.	Forestry Technician	rfish@fs.fed.us	Public notice, e-mail survey
Flood, Eric R.	Forestry Technician/ Wilderness	eflood@fs.fed.us	Public notice, e-mail survey
Fountain, Sherry A.	Natural Resource Specialist	sfountain@fs.fed.us	Public notice, e-mail survey
Frank, Jack A.	Forester	jafrank@fs.fed.us	Public notice, e-mail survey
Frank, Katherine P.	Budget Officer	kfrank@fs.fed.us	Public notice, e-mail survey
Fredrick, Robert W.	Engineering Aid	rwfrederick@fs.fed.us	Public notice, e-mail survey
Fusco, George	Forestry Technician	gfusco@fs.fed.us	Public notice, e-mail survey
Giger, Gary R.	Eng. Equipment Supervisor	ggiger@fs.fed.us	Public notice, e-mail survey
Grisez, Sylvia	Realty Specialist	sgrisez@fs.fed.us	Public notice, e-mail survey
Guntly, Cliff	Electronic Technician	cguntly@fs.fed.us	Public notice, e-mail survey
Hervatin, Cynthia	Realty Specialist	chervatin@fs.fed.us	Public notice, e-mail survey
Hickey, Jeanne M.	GIS Coordinator	jmhickey@fs.fed.us	Public notice, e-mail survey, office interaction
Hille, Andrea	Silviculturist	ahille@fs.fed.us	Public notice, e-mail survey, introductory meeting, office interaction, field interaction, debriefing meeting
Hilyer, William A.	Forestry Technician	whilyer@fs.fed.us	Public notice, e-mail survey
Hosmer, Mary J.	Forester	mhosmer@fs.fed.us	Public notice, e-mail survey
Houston, Linda M.	Geologist	lhouston@fs.fed.us	Public notice, e-mail survey
Hus, Henry G.	Civil Engineer	hhus@fs.fed.us	Public notice, e-mail survey
Hydock, Clare	Botonist	chydock@fs.fed.us	Public notice, e-mail survey
Jamieson, Sandra	Human Resources Specialist	sjamieson@fs.fed.us	Public notice, e-mail survey
Jedrek, Leonard	Civil Engineer	ljedrek@fs.fed.us	Public notice, e-mail survey
John, Darryl	Civil Engineer Technician	djohn@fs.fed.us	Public notice, e-mail survey
Kandare, Richard	Archeologist	rkandare@fs.fed.us	Public notice, e-mail survey, office interaction

Kase, Sandra	GIS Support	skase@fs.fed.us	Public notice, e-mail survey
Keepports, Charles M.	Hydrologist	ckeeports@fs.fed.us	Public notice, e-mail survey
Kelly, Colleen M.	Geologist	colleenkelly@fs.fed.us	Public notice, e-mail survey
Kobielski, Stanley	Supvy Forester	skobielski@fs.fed.us	Public notice, e-mail survey, field interaction
Kolesar, Gary L.	Bio. Sci. Technician	gkolesar@fs.fed.us	Public notice, e-mail survey
Langianese, Joseph	Forestry Technician	jlangianese@fs.fed.us	Public notice, e-mail survey
Lee, John K	Forester	johnlee@fs.fed.us	Public notice, e-mail survey
Leet, Erin D.	Forestry Technician	eleet@fs.fed.us	Public notice, e-mail survey
Leshner, Amy J.	Civil Engineer	alesher@fs.fed.us	Public notice, e-mail survey
Lewis, Michael R	NEPA Analyst	michaellewis@fs.fed.us	Public notice, e-mail survey
Lewis, Nathan D.	Natural Resource Specialist	ndlewis@fs.fed.us	Public notice, e-mail survey
Lombardo, David	Team Leader (Operations)	dlombardo@fs.fed.us	Public notice, e-mail survey, field interaction
Mague, William J.	Forestry Technician	wmague@fs.fed.us	Public notice, e-mail survey
Marocco, Bernie J.	Civil Engineer Technician	bmarocco@fs.fed.us	Public notice, e-mail survey
Martinez, Iran		imartinez@fs.fed.us	Public notice, e-mail survey
Mazzocchi, Rosemarie	Enterprise Security Specialist	rmazzocchi@fs.fed.us	Public notice, e-mail survey, office interaction
McCloskey, James	Utility Systems Operator	jmccloskey@fs.fed.us	Public notice, e-mail survey
McDonald, Donna	Budget Technician	drmcdonald@fs.fed.us	Public notice, e-mail survey
McHenry, John	Acquisition Serv. Specialist	jmchenry@fs.fed.us	Public notice, e-mail survey
McLaughlin, John	Archaeologist	jmclaughlin@fs.fed.us	Public notice, e-mail survey
McMahon, Carol D.	Procurement	carolmcmahon@fs.fed.us	Public notice, e-mail survey
Miles, Lauren	Forester	lmiles@fs.fed.us	Public notice, e-mail survey
Miller, Stephen K.	Public Affairs Officer	stephenmiller@fs.fed.us	Public notice, e-mail survey, introductory meeting, office interaction, stakeholder meeting, debriefing meeting

Milliron, Philip	Motor Vehicle Operator	pmilliron@fs.fed.us	Public notice, e-mail survey
Mohney, Kathryn	Secretary	kmohney@fs.fed.us	Public notice, e-mail survey
Monroe, Shawna	Forestry Technician	smonroe@fs.fed.us	Public notice, e-mail survey
Moore, April L.	Ecologist	amoore02@fs.fed.us	Public notice, e-mail survey
Morgan, James M.	Maintenance	jmorgan@fs.fed.us	Public notice, e-mail survey
Morrison, K. C.	Purchasing Agent	kmorrison@fs.fed.us	Public notice, e-mail survey
Morse, Kathleen	Forest Supervisor	kmorse@fs.fed.us	Public notice, e-mail survey, introductory meeting, office interaction debriefing meeting
Moyer, Julie A.	Outdoor Recreation Planner	jmoyer@fs.fed.us	Public notice, e-mail survey, office interaction
Neff, Ronald	Forester	rneff@fs.fed.us	Public notice, e-mail survey
Nelling, Raymond W.	Forester	rnelling@fs.fed.us	Public notice, e-mail survey
Nelson, Brad B.	Wildlife Biologist	bbnelson@fs.fed.us	Public notice, e-mail survey, , introductory meeting, , field interaction, debriefing meeting
Nelson, James P.	Mail/File Clerk	jpnelson@fs.fed.us	Public notice, e-mail survey
Novitske, Will	Law Enforcement Officer	wnovitske@fs.fed.us	Public notice, e-mail survey
Oyler, Amber		aoyler@fs.fed.us	Public notice, e-mail survey
Parrett, Evelyn M.	Information Receptionist	eparrett@fs.fed.us	Public notice, e-mail survey
Peffer, Diane L.	Resource Specialist	dpeffer@fs.fed.us	Public notice, e-mail survey
Pence, Brent E.	Fish Biologist	bpence@fs.fed.us	Public notice, e-mail survey
Pence, Vicki S.	Forester	vpence@fs.fed.us	Public notice, e-mail survey, office interaction
Porter, Elizabeth A.	Procurement	baporter@fs.fed.us	Public notice, e-mail survey
Porter, Gregory J.	Civil Engineer	gporter@fs.fed.us	Public notice, e-mail survey
Reiley, Donna L.	Office Automation Asst.	dreiley@fs.fed.us	Public notice, e-mail survey

Reitz, Scott	Wildlife Biologist	sreitz@fs.fed.us	Public notice, e-mail survey, introductory meeting, field interaction, debriefing meeting
Robinson, Jessica E.	Civil Engineer	jessicarobinson@fs.fed.us	Public notice, e-mail survey
Robson, Fredrick J.	Prison Crew Leader	frobson@fs.fed.us	Public notice, e-mail survey
Rodrigue, Jason	Forester Silviculturist	jarodrigue@fs.fed.us	Public notice, e-mail survey, introductory meeting, field interaction
Salm, F. Dan	Forest Engineer	dsalm@fs.fed.us	Public notice, e-mail survey, introductory meeting
Schiebel, Kathie	Human Resources Assistant	kschiebel@fs.fed.us	Public notice, e-mail survey
Schultz, John R.	District Ranger	jschultz@fs.fed.us	Public notice, e-mail survey, introductory meeting, office interaction, debriefing meeting
Scronek, Don	Forest/AFMO S&H Prog. Mgr.	dscronek@fs.fed.us	Public notice, e-mail survey
Seyler, James A.	NEPA Team Leader	jseyler@fs.fed.us	Public notice, e-mail survey
Snyder, Bill	Forest Analyst	wasnyder@fs.fed.us	Public notice, e-mail survey
Spisak, Michael	Forester	mispisak@fs.fed.us	Public notice, e-mail survey
Steffan, Theron P.	Wildlife Biologist	tsteffan@fs.fed.us	Public notice, e-mail survey
Stevenson, Jeffrey	Civil Engineer Technician	jstevenson@fs.fed.us	Public notice, e-mail survey
Stovall, Robert	Deputy District Ranger	rstovall@fs.fed.us	Public notice, e-mail survey, introductory meeting, field interaction, debriefing meeting
Stubbe, Janet	Landscape Architect	jstubbe@fs.fed.us	Public notice, e-mail survey, office interaction, stakeholder meeting, debriefing meeting
Swartzbeck, Fred E.	Forestry Technician	fswartzbeck@fs.fed.us	Public notice, e-mail survey
Talkington, Cindi R.	Office Automation Assistant	ctalkingron@fs.fed.us	Public notice, e-mail survey

Tepke, Scott	Forester	stepke@fs.fed.us	Public notice, e-mail survey, field interaction
Thurston, Pamela K.	Wildlife Biologist	pthurston@fs.fed.us	Public notice, e-mail survey
Tollini, Daniel M.	NEPA Analyst	dtollini@fs.fed.us	Public notice, e-mail survey
Turner, Douglas	Equipment Operator	dturner@fs.fed.us	Public notice, e-mail survey
Turnquist, Ava	NEPA Analyst	aturnquist@fs.fed.us	Public notice, e-mail survey
Vester, Karl C.	Writer/Editor	kvester@fs.fed.us	Public notice, e-mail survey
Wallace, Wendell D.	GIS Coordinator	wwallace@fs.fed.us	Public notice, e-mail survey
Ward, Richard R.	Civil Engineer	rrward@fs.fed.us	Public notice, e-mail survey
Watson, Daniel R.	Forestry Technician	dwatson@fs.fed.us	Public notice, e-mail survey
Weese, Paul G.	Transportation Planner	pweese@fs.fed.us	Public notice, e-mail survey
Welker, Nathan J.	Biologist Technician (Fish)	nwelker@fs.fed.us	Public notice, e-mail survey
Wetherell, Robert	Recreation Program Leader	rwetherell@fs.fed.us	Public notice, e-mail survey, office interaction, debriefing meeting
Wetzel, Alan I.	Wildlife Biologist	awetzel@fs.fed.us	Public notice, e-mail survey
Weyant, John	Wildlife Biologist	jweyant@fs.fed.us	Public notice, e-mail survey, field interaction
White III, Robert L.	Forest Silviculturist	rlwhite@fs.fed.us	Public notice, e-mail survey, introductory meeting, field interaction
White, Linda M.	Public Services Supervisor	lmwhite@fs.fed.us	Public notice, e-mail survey
Winters, Sheldon J.	Civil Engineer Technician	swinters@fs.fed.us	Public notice, e-mail survey
Witzel, Teresa L.	Reforestation	twitzel@fs.fed.us	Public notice, e-mail survey
Woods, Cathy A.	Forester (Recreation)	cwoods@fs.fed.us	Public notice, e-mail survey
Work, Jennifer L.	Information Assistant	jwork@fs.fed.us	Public notice, e-mail survey
Yohe, Joan E.	Resource Clerk	jyohe@fs.fed.us	Public notice, e-mail survey

List of other Stakeholders Consulted

There were 251 other stakeholder (in addition to ANF employees) contacted; however, five did not want to be listed in the appendix titled “List of other Stakeholders Consulted.”

Name	Organization	Contact Information	Type of Participation
Ackerman, Dale	Allegheny College	520 N. Main Street, Box 2203 Meadville, PA 16335	Public notice, mail survey
Adams, Rich	Executive Dir., Audubon Society, Western Pennsylvania	614 Dorseyville Rd. Pittsburgh, PA 16507	Public notice, mail survey
Allen, John	Senior Conserv. Employment Program, Dept. of Labor	Unknown	On-site interview
American Rivers	American Rivers	amrivers@americanrivers.org	Public notice, e-mail survey
Anderson, Dale, E.	President, Pa Forest Industry Association	415 Washington St Ridgway, PA 15853-2246	Public notice, mail survey, stakeholder meeting
Anne K. Schmitt	Allegheny College	464 Pierina Drive Pittsburgh, PA 15243	Public notice, mail survey
Arnosti, Don	Institute For Agriculture And Trade Policy	darnosti@iatp.org	Public notice, e-mail survey
Association of Consulting Foresters	Association of Consulting Foresters	director@acf-foresters.com	Public notice, e-mail survey
ATV Trail Users	Recreationists	Cleveland, Ohio	On-site interview
Atwood, Ed	TUSC	256 Mohawk Avenue Warren, PA 16365	Public notice, mail survey, stakeholder meeting
Audubon Pennsylvania	Audubon Pennsylvania	Pennsylvania State Office 100 Wildwood Way Harrisburg, PA 17110	Public notice, mail survey
Auld, Graeme	Yale School of Forestry & Environmental Studies	graeme.auld@yale.edu	Public notice, e-mail survey
Austen, Dr. Douglas	Director, Pa. Fish and Boat Commission	P O Box 67000 Harrisburg, PA 17106-7000	Public notice, mail survey
Banker, Mark	Biologist, Ruffed Grouse Society	P.O. Box 1171 Le Mont, PA 16851-1171 814-867-7946 rgsbank@adelphia.net	Public notice, mail survey, telephone call
Barnard, Joe	Executive Director, Pa. Forestry Assn.	56 East Main Street Mechanicsburg, PA 17055	Public notice, mail survey
Bathke, John	MN Forestry Association	john@b-green.us	Public notice, e-mail survey
Belitskus, Bill	PA Environmental Network	mbproact@penn.com	Public notice, e-mail survey

Bender, D. Wayne	PA Hardwoods Dev. Council	dbender@state.pa.us	Public notice, e-mail survey
Bensel, Ph.D., Terrence	Allegheny College	tbensel@alleg.edu	Public notice, e-mail survey
Bensman, J.	Forest Watch Coordinator, Heartwood	1802 Main Street Alton, IL 62002	Public notice, mail survey
Blinn, Charlie	Professor, UM Forestry	cblinn@umn.edu	Public notice, e-mail survey
Bonomo, Jacquelyn	Western Pennsylvania Conservancy	209 Fourth Ave Pittsburgh, PA 15222 jbonomo@paconserve.org	Public notice, mail survey
Bradford Area School District	Bradford Area School District	P.O. Box 375 Bradford, PA 16701	Public notice, mail survey
Bradford Forest, Inc.	Attn: Timber Dept.	444 High St. P.O. Box 369 Bradford, PA 16701	Public notice, mail survey
Brandt, Wayne	Minnesota Forest Industries	wbrandt11@aol.com	Public notice, e-mail survey
Bratkovich, Stephen M.	Forest Products Specialist, USDA	sbratkovich@fs.fed.us	Public notice, e-mail survey
Brown, Stacy	National Wildlife Federation	browns@nwf.org	
Bschor, Denny	USDA FS, Regional Forester, Reg. 10	dbschor@fs.fed.us	Public notice, e-mail survey
Buccowich, Mark	USDA FS, Forest Stewardship Specialist	mbuccowich@fs.fed.us	Public notice, e-mail survey
Buchele, Tom	University of Pittsburgh Law	3900 Forbes Ave Pittsburgh, PA 15260	Public notice, mail survey
Burch, Mason	Allegheny College	533 Old Stamford Road New Canaan, CT 06840	Public notice, mail survey
Burgio, Daniel	Allegheny College	520 N. Main Street, Box 2129 Meadville, PA 16335	Public notice, mail survey
Byerly, Jack	PA Game Commission, Game Div. Forestry Div. Chief	jobyerly@state.pa.us	Public notice, e-mail survey
Cables, Rick	USDA FS, Regional Forester, Reg. 2	rcables@fs.fed.us	Public notice, e-mail survey
Caffee, Emily	Allegheny College	520 N. Main Street, Box 2135 Meadville, PA 16335	Public notice, mail survey
Carey, Henry	Forest Stewards Guild	henry@forestguild.org	Public notice, e-mail survey
Carey, Renee	Northcentral PA Conservancy, Exec. Director	office@npcweb.org	Public notice, e-mail survey

Carpenter, Connie	USDA FS, Sustainability Specialist	ccarpenter@fs.fed.us	Public notice, e-mail survey
Catlin, Teresa	USDA FS, Ecologist	tcatlin@fs.fed.us	Public notice, e-mail survey
Cesareo, Kerry	World Wildlife Fund	kerry.cesareo@wwfus.org	Public notice, e-mail survey
Chrysler, Jim (Bill Bilitkus)	Allegheny Defense Project	P.O. Box 245 Clarion, PA 16214	Public notice, mail survey, telephone call
Chura, David	MN Logger Education Program (MLEP)	dchura@mlep.org	Public notice, e-mail survey
Cline, Mike	Tin Mountain Conservation Center	mcline@tinmtn.org	Public notice, e-mail survey
Conti, Arielle	Allegheny College	520 N. Main Street, Box 737 Meadville, PA 16335	Public notice, mail survey
Cook, Cheryl L.	Commonwealth of PA Dept. of Agriculture	checook@state.pa.us	Public notice, e-mail survey
Craig, Keith	Pa Hardwoods Development Council	234 N Cameron St, Room 310 Harrisburg, PA 17110-9408	Public notice, mail survey
Cróese, Ron	Minnesota Environmental Partnership	ronkroese@mepartnership.org	Public notice, e-mail survey
CT Forest Association	CT Forest Association	conn.forest.assoc@snet.net	Public notice, e-mail survey
Curry, Susan	Ntl. Forest Protection Alliance, Executive Director	susan@forestadvocate.org	Public notice, e-mail survey
Daly, Ned	FSC, VP of Operations	ndaly@fscus.org	Public notice, e-mail survey
Davidson, Amber	Allegheny College	520 North Main Street Box 755 Meadville, PA 16335	Public notice, mail survey
Decker, Jim	Warren Co., Chamber of Commerce	P O Box 942 Warren, PA 16365	Public notice, mail survey
Delarme, Diane	Kinzua Ltd.	RR 1 Box 1323k Clarendon, PA 16313	Public notice, mail survey
Dersi, Christine M.	Allegheny College	520 N. Main Street, Box 1822 Meadville, PA 16335	Public notice, mail survey
Dessecker, Dan	Senior RGS Biologist Ruffed Grouse Society	rgsdess@chibardun.net	Public notice, e-mail survey

Diberardinis, Michael	Pa DCNR, Executive Office	7th Fl Rachel Carson Bldg. Box 8767 Harrisburg, PA 17105-8767	Public notice, mail survey
DiPette, Stephanie	Allegheny College	520 N. Main Street, Box 1486 Meadville, PA 16335	Public notice, mail survey
Domenick, Len	Matson Lumber Company	132 Main Street Brookville, PA 15825	Public notice, mail survey
Dower, Roger	FSC, President	rdower@fscus.org	Public notice, e-mail survey
Downey, Dave	Unified Sportsmen	6 Erie St Clarendon, PA 16313	Public notice, mail survey
Elder, Gary K.	Ridgway Area School District	P.O. Box 447 Ridgway, PA 15853	Public notice, mail survey
Elk County Commissioners	Elk County Commissioners	Elk County Courthouse, Box 448 Ridgway, PA 15853	Public notice, mail survey
English, Honorable Phil	Unknown	208 E. Bayfront Pkwy Ste 102 Erie, PA 16507-2405	Public notice, mail survey
Ernst, Dan	IN DNR	dernst@dnr.state.in.us	Public notice, e-mail survey
Farrar, Mandy	Small Woodland Owners Association of Maine	mandy@swoam.com	Public notice, e-mail survey
Fernholz, Katie	Dovetail	katie@dovetailinc.org	Public notice, e-mail survey
Finley, Dr. Jim	Penn State Cooperative Extension	7 Ferguson Bldg. University Park, PA 16802-4300	Public notice, mail survey
Forest County Courthouse	Forest County Commissioners	526 Elm St, Box 3 Tionesta, PA 16353	Public notice, mail survey
Forest Ecology Network of Maine	Forest Ecology Network of Maine	fen@powerlink.net	Public notice, e-mail survey
Forest Watch	Forest Watch	forestwatch@forestwatch.org	Public notice, e-mail survey
Forsgren, Harv	USDA FS, Reg. Forester, Reg. 3	hforsgren@fs.fed.us	Public notice, e-mail survey
Francisco, Gene	WI Professional Loggers Assoc., Exec. Director	gfrancisco@charter.net	Public notice, e-mail survey
Freimark, Robert M.	Senior Policy Analyst, The Wilderness Society	720 Third Avenue., Suite 1800 Seattle, WA 98104 freimark@twsnw.org	Public notice, mail survey
Friends of Allegheny Wilderness	Friends of Allegheny Wilderness	alleghenyfriends@earthlink.net	Public notice, e-mail survey
Friends of the Earth	Friends of the Earth	foe@foe.org	Public notice, e-mail survey

Gardner, John E	Ridgway Township Supervisors	164 Ridgway Drive Ridgway, PA 15853	Public notice, mail survey
Gast, Scott	Allegheny College	520 N. Main Street Meadville, PA 16335	Public notice, mail survey
Gay, George	Northern Forest Alliance	ggay@nfainfo.org	Public notice, e-mail survey
Geer, Dr. Edward M.	Johnsonburg Area School District	591 Elk Ave. Johnsonburg, PA 15845	Public notice, mail survey
Gilges, Kent	The Nature Conservancy, Dir. Forest Conservation Program	kgilges@tnc.org	Public notice, e-mail survey
Glotfelty, Caren	The Heinz Endowments	glotfelty@heinz.org	Public notice, e-mail survey
Goebel, Martin	Sustainable Northwest	mgoebel@sustainablenorthwest.org	Public notice, e-mail survey
Goergen, Jr., Michael T.	Society of American Foresters, Exec. VP & CEO	goergenm@safnet.org	Public notice, e-mail survey
Gonzales, Merrill	Bradford Era	P.O. Box 365 Bradford, PA 16701	Public notice, mail survey
Goodman, Linda	USDA FS, Regional Forester, Reg. 6	lgoodman@fs.fed.us	Public notice, e-mail survey
Grace, Jim	PA DCNR Bureau of Forestry, State Forester	jgrace@dnr.state.pa.us	Public notice, e-mail survey
Grant, Mr. John	Warren County School District	185 Hospital Drive North Warren, PA 16365	Public notice, mail survey
Green Building Alliance	Green Building Alliance	eamong@gbapgh.org	Public notice, e-mail survey
Grenz, Connie	The Collins Companies	cgrenz@collinsco.com	Public notice, e-mail survey
Grunwald, John	Danzer Group	1170 N Clay Lick Rd Nashville, TN 47448	Public notice, mail survey
Guilford, Steve	Forest County Chamber of Commerce	218 Elm St Tionesta, PA 16535	Public notice, mail survey
Haines, Sharon	International Paper	sharon.haines@ipaper.com	Public notice, e-mail survey
Hall, Daniel	Forest Ethics	daniel@forestethics.org	Public notice, e-mail survey
Hamilton Township Supervisors	Hamilton Township Supervisors	Curtis Road Ludlow, PA 16333	Public notice, mail survey
Hammett, A.L.	Virginia Tech, Dept. of Wood Science & Forest Products	himal@vt.edu	Public notice, e-mail survey

Hansen, Clyde	Sierra Club	clyde.hanson@sierraclub.org	Public notice, e-mail survey
Hansen, Paul	Izaak Walton League of America, Exec. Director	executivedirector@iwla.org	Public notice, e-mail survey
Harlan, Maggie	PA Native Plant Society, President	president@pawildflower.org	Public notice, e-mail survey
Hartman, Tom	FSC FMO	forester.efkinc@verizon.net	Public notice, mail survey, stakeholder meeting
Hawk, Terry	Mead Township Supervisors	RD 1, Box 1226a Clarendon, PA 16313	Public notice, mail survey
Hazel, John	Forest Health, USDA, NE Area State & Private	180 Canfield St Morgantown, WV 26505	Public notice, mail survey
Hedlund, Jack	Allegheny Forest Alliance	P.O. Box 719 Kane, PA 16735	Public notice, mail survey
Heinz, Jason	Western Pennsylvania Conservancy	jheinze@paconservancy.org	Public notice, mail survey, stakeholder meeting
Hepner, Megan	Allegheny College	520 N. Main Street, Box 1459 Meadville, PA 16335	Public notice, mail survey
Hess, Ed	Mercyhurst Arch. Institute	501 East 38th St Erie, PA 16512	Public notice, mail survey
Highland Township Supervisors	Secretary, Clarion County	260 Dolby Lane Clarion, PA 16214	Public notice, e-mail survey
Hill, Brian	Pennsylvania Environmental Council, President and CEO	bhill@pecpa.org	Public notice, e-mail survey
Hitt, Mary Anne	Appalachian Voices	mahitt@bellsouth.net	Public notice, e-mail survey
Hoffman, Ashlee	Allegheny College	746 Elk Street Franklin, PA 16323	Public notice, mail survey
Hokans, Richard H.	Regional Analyst, USDA Forest Service	626 East Wisconsin Ave. Suite 700 Milwaukee, WI 53202 414-297-3607	Test Evaluation Observer
Holjencin, Larry	NWTF, Reg. Director	133 Timberline Road St. Marys, PA 15857	Public notice, mail survey
Horsburgh, Elizabeth	Natl. Audubon Society	ehorsburgh@audubon.org	Public notice, e-mail survey
Houghland, Paul	National Hardwood Lumber Association	p.houghland@nhla.com	Public notice, e-mail survey

Hovey, Jim	Allegheny Trail Riders	P.O. Box 134 Warren, PA 16365	Public notice, mail survey
Hrubes, Robert	Scientific Certification Systems	rhrubes@scscertified.com	Public notice, e-mail survey
Hrubovcak, Marian H.	Pa. DCNR, Bureau of Rec & Conservation	P.O. Box 8475 Harrisburg, PA 17105-8552	Public notice, mail survey
Hunt, Frances	The Wilderness Society	fran_hunt@twc.org	Public notice, e-mail survey
Hutchinson, Alan	Forest Society of Maine	info@fsmaine.org	Public notice, e-mail survey
Jacobs, Robert T.	USDA FS, Regional Forester, Reg. 7	rjacobs@fs.fed.us	Public notice, e-mail survey
Jacobson, Michael	Penn State School of Forest Resources	mj2@psu.edu	Public notice, e-mail survey
Jenks Township Supervisors	Jenks Township Supervisors	P.O. Box 436, 2 Pine St Marienville, PA 16239	Public notice, mail survey
Johnson, Kirk	Friends of Allegheny Wilderness	220 Center St Warren, PA 16365	Public notice, mail survey, telephone call
Johnson, Nel	Director of Conservation, The Nature Conservancy	500 N Third St 6th Floor Harrisburg, PA 17101	Public notice, mail survey
Jones Township	Jones Township	P.O. Box 25 Wilcox, PA 15870	Public notice, mail survey
Kahle, Charles	Natl. Audubon Society-Western Region	charlesk@seanet.net	Public notice, e-mail survey
Kane, Kenneth	Keith Horn, Inc., Kane Area School District	P.O. Box 319 Kane, PA 16735-0319	Public notice, mail survey, stakeholder meeting
Kellett, Michael	Restore the Northwoods, Exec. Director	kellett@restore.org	Public notice, e-mail survey
Kimbell, Abigail	USDA FS, Regional Forester, Reg. 1	akimbell@fs.fed.us	Public notice, e-mail survey
Kittner, Linda	Elk Township Supervisors	Rd #1 Box 1484 Russell, PA 16365	Public notice, mail survey
Kleissler, Jim	Allegheny Defense Project	info@alleghenydefense.org	Public notice, e-mail survey
Kocjancic, Jr., Ed	FORECON	814-837-8488	Telephone call
Kuleck, Ron	North Central Pa Reg. Plan & Dev.	651 Montmorenci Ave. Ridgway, PA 15853	Public notice, mail survey
Labesky, John	Sheffield Township Supervisors	P.O. Box 784 Sheffield, PA 16347	Public notice, mail survey

Ladie , Jenna L.	Allegheny College	520 N. Main Street, Box 1119 Meadville, PA 16335	Public notice, mail survey
Lafayette Township Supervisors	Lafayette Township Supervisors	HC 1, Box 136a Lewis Run, PA 16738	Public notice, mail survey
Lawson, Joseph	MeadWestvaco Corp., Mngr., Forest Certification	jcl@meadwestvaco.com	Public notice, e-mail survey
Lester, Mike	Dep. St. Forester, Pa DCNR Bureau of Forestry	P.O. Box 8552 Harrisburg, PA 17105-8552	Public notice, mail survey
Levesque, Charlie	Innovative Natural Resource Solutions, LLC	levesque@theplumline. com	Public notice, e-mail survey
Lunden, Deborah L.	Director, McKean Co. Planning Commission	Court House-Main St. Smethport, PA 16749	Public notice, mail survey
Lyskava, Paul	Executive Director, Pennsylvania Forest Products Association	545 West Chocolate Ave. Hershey, PA 17033 (717) 312-1244 (717) 312-1335 (fax) plyskavav@hlma.org	Public notice, mail survey, telephone call
MacCleery, Douglas	Senior Policy Analyst, USDA Forest Service	Sidney Building-MS-1103 14 th and Independence Ave., S.W. Washington D.C. 20250 202-205-1745	Test Evaluation Observer, stakeholder meeting
Mader, Rick	Warren County Conservation District	609 Rouse Home Ave, Suite 203 Youngsville, PA 16371	Public notice, mail survey
Manno, Kenneth	Sustainable Forestry Initiative of PA	sfi@penn.com	Public notice, e-mail survey
Manross, David W	Chairman, Harmony Township Supervisors	Rd 1, Box 166 Tidioute, PA 16351	Public notice, mail survey
Mater, Catherine	The Pinchot Institute for Conservation	mater@mater.com	Public notice, e-mail survey
Mayor	City of Warren	318 West Third Warren, PA 16365	Public notice, mail survey
Mays, Bob	Senior Conserv. Employment Program, Dept. of Labor	Unknown	On-site interview
McCarter, Katherine	Ecological Society of America	ksm@esa.org	Public notice, e-mail survey

McGrath, Dennis	Western Pennsylvania Conservancy	dmcgrath@paconserve.org	Public notice, e-mail survey
McKean County Commissioners	McKean County Commissioners	McKean County Courthouse Smethport, PA 16749	Public notice, mail survey
McNutt, Les	Trout Unlimited Pa Chapter	P.O. Box 288, 105 Charles St Hooversville, PA 15936-0288	Public notice, mail survey
McQuilkin, Jr, William	Natl. Audubon Society, Southeast Region	wwwmcq@comcast.net	Public notice, e-mail survey
Melville, Martin	Sustainable Forestry Initiative	315 S. Allen St., Suite 418 State College, PA 16801	Public notice, mail survey
Miller, Chris (Melvin Miller and Raymond Miller)	Miller Logging	Unknown	On-site interview
Millstone Township Supervisors	Millstone Township Supervisors	Rd. 1 Sigel, PA 15860	Public notice, mail survey
Mitchell, Kathleen	THPO, Seneca Nation of Indians	467 Center St Salamanca, PA 14779	Public notice, mail survey
Mizn, Lynn Sue r	MN DNR	lynn.mizner@dnr.state.mn.us	Public notice, e-mail survey
Monnig, Edward	USDA FS, Deputy Forest Supervisor	emonnig@fs.fed.us	Public notice, e-mail survey
Moore, Randy	USDA FS, Regional Forester, Reg. 9	rmoore@fs.fed.us	Public notice, e-mail survey
Morris, David	Northwest Pa. Great Outdoors	175 Main Street Brookville, PA 15825	Public notice, mail survey
Morton, G. Lowell	Pres., Pa State Snowmobile Association	P.O. Box 81, 350-C W Main Street Annville, PA 17003-0081	Public notice, mail survey
Nargang, Ron	The Nature Conservancy-MN	rnargang@tnc.org	Public notice, e-mail survey
National Park Service	North Country Nat. Scenic Trail	700 Rayovac Drive #100 Madison, WI 53711	Public notice, mail survey
Natural Resource Defense Council	Natural Resource Defense Council	nrdcinfo@nrdc.org	Public notice, e-mail survey
Nay, Caitlin	Allegheny College	520 N. Main Street, Box 1909 Meadville, PA 16335	Public notice, mail survey
Nemcik, Bert	President, ANF Chapter, North Country Trail Association	Marienville, PA 16239	Public notice, mail survey
Niebling, Charles	SPNHF	cniebling@forestsociety.org	Public notice, e-mail survey

North Country Trail Association	North Country Trail Association	4229 E. Main Street Lowell, MI 49331	Public notice, mail survey
Northup, Jim	Forest Watch, Exec. Director	jnorthup@forestwatch.org	Public notice, e-mail survey
Norton, Matt	MN Center For Environmental Advocacy	mnorton@mncenter.org	Public notice, e-mail survey
Ohara, Tim	Minnesota Forest Industries	tjohara@aol.com	Public notice, e-mail survey
Osborn, Carrie S.	Allegheny College	520 N. Main Street, Box 1210 Meadville, PA 16335	Public notice, mail survey
Pa Game Commission	Executive Director	2001 Elmerton Ave Harrisburg, PA 16749	Public notice, mail survey
Pardoe, David	Natl. Audubon Society- MidAtlantic Region Director	dpardoe@erols.com	Public notice, e-mail survey
Parks, Nancy	Sierra Club, Pa Chapter	P.O. Box 120, 201 W. Aaron Square Aaronsburg, PA 16820-0120	Public notice, mail survey
Payne, Donald E.	Payne Enterprises	P.O. Box 159 Kane, PA 16735	Public notice, mail survey
Pennsylvania State Office	Audubon Pennsylvania	100 Wildwood Way Harrisburg, PA 17110	Public notice, mail survey
Perdue, Jack	Maryland DNR	jperdue@dnr.state.md.us	Public notice, e-mail survey
Perry, Meghan	Allegheny College	1536 Allison Drive Pittsburgh, PA 15241	Public notice, mail survey
Peterson, Honorable John		127 W. Spring Street, Suite C Titusville, PA 16354	Public notice, mail survey
Phillips, Spencer	The Wilderness Society	spencer_phillips@twc.org	Public notice, e-mail survey
Pingrey, Paul E.	WI DNR	paul.pingrey@dnr.state.wi.us	Public notice, e-mail survey
Pitts, Mark	Glatfelter	mpitts@glatfelter.com	Public notice, e-mail survey
Price, Frances Raymond	The Nature Conservancy, CRM Program Director	fprice@tnc.org	Public notice, e-mail survey
Price, Will	Program Manager, Pinchot Institute for Conservation	willprice@pinchot.org	Public notice, mail survey, test evaluation, observer, stakeholder meeting
Puller, Blaine	Pine Collins Co.	Box 807 Kane, PA 16735 bpuller@collinsco.com	Public notice, mail survey, stakeholder meeting

Rainforest Action Network- General Information	Rainforest Action Network- General Information	rainforest@ran.org	Public notice, e-mail survey
Ramsey, Wes	Penn Soil RC&D	265 Holiday Inn Road, Suite 3 Clarion, PA 16748-0504	Public notice, mail survey
Rapp, Honorable Kathy	Pa House of Representatives	404 Market St Warren, PA 16365	Public notice, mail survey
Rendell, Honorable Edward	Attn: Howard Brush	100 State St., Suite 202 Erie, PA 16507	Public notice, mail survey
Restore the Northwoods	Restore the Northwoods	restore@restore.org	Public notice, e-mail survey
Rhoads, Stephen W.	President, Pennsylvania Oil & Gas Assn.	106 Locust Grove Rd., P.O. Box 349 Bainbridge, PA 17502	Public notice, mail survey
Ridgway Area Chamber of Commerce	Ridgway Area Chamber of Commerce	231 Main Street Ridgway, PA 15853	Public notice, mail survey
Roberts, Wayne	Executive Director, Pa Federation of Sportsmens Club	2426 North Second St. Harrisburg, PA 17110	Public notice, mail survey
Rohall, Ronald	PA Association of Conservation Districts, Inc.	rjrohall@westol.com	Public notice, e-mail survey
Romig, Bob	Ohio Forestry Association, Exec. Director	bobr@ohioforest.org	Public notice, e-mail survey
Ryan, Geoffrey Cobb	Natl. Audubon Society- Northeast Region	gcryan@earthlink.net	Public notice, e-mail survey
Sabella, John	Sabella Land and Forest Products	Unknown	On-site interview
Sample, Al	The Pinchot Institute for Conservation	pinchot@pinchot.org	Public notice, e-mail survey
Sanders, Wendy Hinrichs	Great Lakes Forest Alliance	forestls@lsfa.org	Public notice, e-mail survey
Santorum, Honorable Rick	c/o Scott Harbula	1705 W 26th St Erie, PA 16508	Public notice, mail survey
Scarnati, Honorable Joseph	Pa 25th District	315 Second Avenue, Suite 203 Warren, PA 16365	Public notice, mail survey
Schmidt, Susan	Trust for Public Lands - MN State Office Director	Susan.Schmidt@tpl.org	Public notice, e-mail survey
Shade, Doug	Pa State Chairman, Ducks Unlimited	2129 Old Lancaster Pike Reinholds, PA 17569	Public notice, mail survey
Shawley, Diane	Northern Alleghenies Vacation Reg.	P.O. Box 245 Warren, PA 16365	Public notice, mail survey

Sheeley, Diane	Bradford Area Chamber of Commerce	Two Marilyn Horne Way Bradford, PA 16701	Public notice, mail survey
Sheppard, Evan	Allegheny College	520 N. Main Street, Box 778 Meadville, PA 16335	Public notice, mail survey
Sheridan, Dave	Green Building Association of Central PA, Exec. Director	info@gbacpa.org	Public notice, e-mail survey
Shields, Jesse	Allegheny College	520 N. Main Street, Box 419 Meadville, PA 16335	Public notice, mail survey
Sierra Club - PA Chapter	Sierra Club - PA Chapter	sierraclub.pa@paonline. com	Public notice, e-mail survey
Sierra Club-NE Chapter	Sierra Club-NE Chapter	ne.field@sieraclub.org	Public notice, e-mail survey
Simpson, Bob	American Tree Farm System	info@treefarmssystem.org	Public notice, mail survey
Sinker, John	Clean Air Council	135 S. 19th St., Suite 300 Philadelphia, PA 19103	Public notice, mail survey
Smith, Danna	Dogwood Alliance	www.dogwoodalliance. org	Public notice, e-mail survey
Smith, David	Society of American Foresters	smithdwm@vt.edu	Public notice, e-mail survey
Smith, Evan	The Conservation Fund	esmith@conservationfund.org	Public notice, e-mail survey
Snow, Michael	American Hardwood Export council	michael_snow@afandpa.org	Public notice, e-mail survey
Snyder, Barry	President, Seneca Nation of Indians	12837 Route 438 Irving, PA 14081	Public notice, mail survey
Specter, Honorable Arlen	Federal Building Suite B-120	17 South Park Row Erie, PA 16501	Public notice, mail survey
Steffey, Nadine	Kane Area Chamber of Commerce	54 Fraley St Kane, PA 16735	Public notice, mail survey
Stewart, Katie	Allegheny College	520 N. Main Street, Box 2260 Meadville, PA 16335	Public notice, mail survey
Stout, Susan	USDA Forest Service, NE Research Experiment Station	Region 9, Allegheny National Forest	Field Interaction
Strauss, Dr Charles H.	Director, School of Forest Resources	Penn State University, Univ. Park, PA 16802	Public notice, mail survey

Swanson, Susan	Executive Director, Allegheny Hardwood Utilization Group	P.O. Box 133 Kane, PA 16735 hardwood@penn.com	Public notice, mail survey
The Nature conservancy - PA Office	The Nature conservancy - PA Office	pa_chapter@tnc.org	Public notice, e-mail survey
Theisen, Mark	Forest Silviculturalist Cheq.-Nic. NF	715-362-1346 mtheisen@fs.fed.us	Test Evaluation Observer
Theisen, Susan	Accompanying Mark Theisen	Unknown	Accompanying Test Evaluation Observer
Thompson, Dr. Sue A.	Pres./CEO, Pa. Biodiversity Partnership	16 Terminal Way Pittsburgh, PA 15219 thompson@pabio diversity.org	Public notice, mail survey
Thompson, Steven	Unknown	sthompson@desktop.org	Public notice, e-mail survey
Thornhill, Alan	Society for Conservation Biology	athornhill@conbio.org	Public notice, e-mail survey
Troyer, Jack	USDA FS, Regional Forester, Reg. 4	jtroyer@fs.fed.us	Public notice, e-mail survey
US Green Building Council	US Green Building Council	info@usgbc.org	Public notice, e-mail survey
Van Slyke, Tom	American Loggers council	americanlogger@aol.com	Public notice, e-mail survey
Vanderhoof, Brad	Pa. Dep, Bureau Envir. Protection	230 Chesnut St Meadville, PA 16354	Public notice, mail survey
Vicini, Duane	Superintendent, Forest County School District	210 Vine St Tionesta, PA 16353	Public notice, mail survey
Villarreal, Marjorie	Howe Township Supervisors	HC 1, Box 168 Sheffield, PA 16347	Public notice, mail survey
Vitello, John	Dept. of Interior, Bureau of Indian Affairs	johnvitello@bia.gov	Public notice, e-mail survey
Vitello, John	Dept. of Interior, Bureau of Indian Affairs	johnvitello@bia.gov	Public notice, e-mail survey
Von Hagen, Bettina	ECOTRUST, VP Natural Capital Fund	bettina@ecotrust.org	Public notice, e-mail survey
Warren County Commissioners	Warren County Commissioners	Courthouse Warren, PA 16365	Public notice, mail survey
Washburn, Michael P.	FSC, VP Forestry & Marketing	mwashburn@fscus.org	Public notice, e-mail survey

Weingart, Bernie	USDA FS, Regional Forester, Reg. 5	bweingart@fs.fed.us	Public notice, e-mail survey
Wells, Dean	Unknown	Unknown	Public notice, mail survey, stakeholder meeting
Wetzel, M. Dan	Executive Director, Seneca Highlands I-Unit 9	119 Mechanic St Smethport, PA 16749	Public notice, mail survey
Weyers, Eva	Allegheny College	520 N. Main Street, Box 1138 Meadville, PA 16335	Public notice, mail survey
White, Honorable Mary Jo	1140 Liberty St	Franklin, PA 16323	Public notice, mail survey
Whittle, John	Natl. Audubon Society- Southwest Region	john.whittle@lamar.edu	Public notice, e-mail survey
Wilkinson, Bill	Senior Forester, Forest Stewardship Council - U.S.	39 1/2 South G St. Arcata, CA 95521 (W) 707-825-0475 (F) 707-825-0536 (C) 707-616-6197 bwilkinson@fscus.org	Public notice, e-mail survey
Woedl, Liz	Natl. Audubon Society-Great Lakes Region	lwoedl@earthlink.net	Public notice, e-mail survey
Wolf, Roger	Natl. Audubon Society-Rocky Mountain Region	wolf@azimm.com	Public notice, e-mail survey
Wolfe, Tom	New York Department of Environmental Conservation	tbwolfe@gw.dec.state.ny.us	Public notice, e-mail survey
Wood, Terry	Forest County Snowmobile Club	8622 Hickory Hollow Drive Chardon, OH 44024	Public notice, mail survey
Woodside, Carla	Green Township	Box 610 Tionesta, PA 16353	Public notice, mail survey
Yassa, Sami	Natural Resource Defense Council	syassa@nrdc.org	Public notice, e-mail survey
Yingling, Ginny	Sierra Club	ginny.yingling@northstar.sierraclub.org	Public notice, e-mail survey
Zumeta, David	MN Forest Resources Council	dzumeta@tc.umn.edu	Public notice, e-mail survey

APPENDIX VIII: Peer review addenda (confidential)

ANF Peer Review No. 1

Peer Reviewer: Steve Selin

Reviewer Specialization: Social science; recreation resource management; forest management.

Reviewer Comments:

Test Evaluation Report Quality:

How would you rate the overall quality of the test evaluation report?

High Acceptable Poor (provide comments below)

Do team observations and findings clearly support the determination of conformance reached?

Yes No Comments: Overall, a well researched and justifiable decision.

Areas for improvement:

Editing/Formatting: Comments:

Lack of Clarity: Comments:

Technical Analysis: Comments:

Information lacking: Please indicate areas: Information on how stakeholders were selected.

Other comments:

Test Evaluation Process:

Based upon the information in the test evaluation report, do you have any comments on the test evaluation process (i.e. team composition, field time, stakeholder consultation) and the adequacy of fieldwork as the basis for making the determination of conformance?

Comments: I'd like to see more clarity on how stakeholders surveyed were selected. From the information provided, it sounds like ANF staff provided a list that was amended by the SW team. Report conclusions will gain credibility if you can show that a representative sample was chosen by some scientific method (eg. community reference system (Emery & Purser, 1996). How can you be sure that your stakeholder list is not biased towards people that tend to support ANF management practices?

Also, the stakeholder groups defined appear to be heavily weighed towards agency, academic, and industry groups. Can you provide an explanation for why only 5 of 125 NGOs responded or were engaged with this process?

SmartWood Response: See corresponding responses in the Peer Review Comments Table below.

Report Conclusions:

Is the determination of conformance recommended by the team justified by the reports observations and findings?

Yes No If no, explain?

Do you agree with determination of conformance recommendation of the team?

Yes No If no, state reasons why?

Peer Reviewer Comments Table:

Report section	Issue: Disagreement or suggested action	SW Response
Pg. 11; Stakeholder consultation process	See notes above regarding the assessment process and the sampling procedures used to select stakeholders who were subsequently surveyed. How can you be sure that your stakeholder list is not biased towards people that tend to support the ANF management practices?	<p>The stakeholders included on the mailed survey questionnaire were chosen as described by the peer reviewer. SmartWood recognizes that stakeholder lists provided by entities undergoing evaluations are likely to be biased in some manner. Consequently, stakeholder lists provided by the operation being audited are considered a starting point, and are enhanced by SmartWood. For ANF employees, because the entire population was surveyed, the questionnaire functioned essentially as a census survey. For the remaining stakeholders, comprehensive stakeholder lists were provided by ANF and supplemented by SmartWood. The summary table in Section 2.6 listing 188 stakeholders “consulted or providing input” represents all stakeholders that provided written or verbal comment including: both ANF employees and external stakeholders receiving survey questionnaires; stakeholders interviewed during the audit (in person or remotely); stakeholders providing input via public meetings; or stakeholders providing unsolicited input.</p> <p>Notifications of the test evaluation were distributed with an invitation to provide comment or receive additional information to a list of stakeholders developed by SmartWood. The SmartWood stakeholder list was developed from a national stakeholder list maintained by SmartWood and customized specifically for the ANF to include local, regional and national stakeholders. The SmartWood stakeholder list contained 238</p>

		<p>organizations and individuals representing academia, environmental and conservation groups, government agencies, industry and professional organizations and other interested organizations.</p> <p>The survey questionnaire was not developed using scientific methodology. The objective of surveying stakeholders was to enhance the auditing process. Survey results were used as supplemental information, to identify potential issues that may not have otherwise been discovered, or to reinforce observations made by the auditors through other avenues of evidence gathering. The SmartWood auditors did not base any determinations of conformance solely on results from the survey questionnaire, nor from stakeholder input gathered through other methods. Stakeholder consultation measures were effective in aiding the auditors to make credible judgments on conformance to the standards used in the test evaluation.</p> <p>A variety of techniques were used to facilitate stakeholder input including: posting and distribution of a public notice announcing the test evaluation and providing contact information for providing comment; two public meetings publicly advertised in the local media; individual interviews; and distribution by mail of a survey questionnaire. SmartWood auditors contacted a diverse range of stakeholders with respect to geographic context (national, regional, local) as well as perspective (local residents, public land management agencies, regulatory agencies, tribal concerns, environmental organizations, forest workers, employees, forest users, academics).</p> <p>The stakeholder consultation measures employed by SmartWood in the ANF test evaluation are consistent with the established standards of major third party forest certification programs (e.g. FSC Standard for Stakeholder Consultation for Forest Evaluation, FSC STD 20 006). The purpose of stakeholder consultation</p>
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		<p>measures undertaken within the context of third party forest auditing is to evaluate conformance to the standards, not to define public opinion.</p> <p>The text in Section 2.6 has been modified to include a more comprehensive description of the identification of stakeholders.</p>
Pg. 11; Survey response rate	You might consider providing some explanation of the low response rate (15.7%) attained through this survey.	<p>Due to budgetary and temporal constraints, there was no second mailing or follow-up contacts made to the mail survey recipients. Although SmartWood concurs that a 15.7% response rate for the survey questionnaire is low, it is also typical for this type of survey. Given the objective of the survey questionnaire, even though the response rate was low, having received input from several hundred stakeholders beyond those contacted during the test evaluation by telephone or in person significantly enhanced the auditing process. Text has been added to Section 2.6 to address the relatively low response rate.</p>
Pg 11; Stakeholder type table	The stakeholder groups defined appear to be heavily weighed towards agency, academic, and industry groups. Can you provide an explanation for why only 5 of 125 NGOs responded or were engaged with this process?	<p>Because all ANF employees were included in the survey questionnaire, the surveyed population was weighted toward USDA Forest Service employees. In recognition of this fact, issues identified via the survey questionnaire were analyzed according to employee responses versus those of other stakeholders to ensure the results were not biased by the proportionately high number of employees included in the survey.</p> <p>Beyond the proportionately high number of ANF employees, the next largest stakeholder group contacted was environmental and conservation organizations. As pointed out by the peer reviewer, a consistent pattern of non-responsiveness among environmental NGOs was noted. While no formalized effort was made to determine the reason, it appears that a deliberate decision may have been taken by several national ENGOs to refrain from participating in the test evaluation of ANF as well as the test evaluations of other national forests included in the pilot tests. Poor survey response may be evidence to this effect. Several ENGOs were also called and/or</p>

		<p>emailed during the test evaluation with similar results (no response).</p> <p>As reported in the summary table located in Section 2.6 of the report, with the exception of students, volunteers and NGOs, there is relative balance among stakeholder groups consulted or providing input. Of the total of 188 stakeholders consulted, among the six remaining categories of stakeholders identified (excluding student, NGO's and volunteers), the proportionate representation of each group ranges from a low of 7% (academics) to a high of 24% (other stakeholders), with ANF employees, government representatives and recreationists representing 19%, 16% and 19% respectively.</p>
Pg 14; SW response re P5	The reviewer comment that harvest levels are currently well below ASQ so sustainable harvest levels are being observed may invite criticism. I don't believe ASQ has been established as a credible scientific benchmark for sustainable forestry.	<p>The issues of "sustainability" and harvest levels - particularly in the context of forest health - are contentious on many public forests, including the national forests. The term "sustainable forestry" is clearly open to innumerable interpretations. The standards used for the test evaluation of ANF do not establish a direct link between harvest levels and "sustainable forestry". SmartWood's findings are limited to evaluating conformance to the standards used in this test evaluation. Rate of harvest is addressed principally under Criterion 5.6, which requires that harvest levels do not exceed net growth. Since the ANF is harvesting timber at levels far below ASQ, it was determined that they are in conformance with Indicators relating to harvest levels (rate of harvest). However, the issue of forest regulation (lack of age class balance) and the associated unpredictable, flow of timber products was addressed via an Observation (OBS 3/06).</p> <p>Consistent with the peer reviewers comments, the reference to "...the performance standards relating to sustainable harvest levels..." has been revised to remove the word "sustainable".</p>
Pg. 15; SH comment and SW response re wilderness areas	SW reviewer seems quick to discount SH preference regarding the need for more wilderness areas. I'm not sure the exchange is central to the charge of the SW study team and only invites criticism. Wilderness designation requires an act of Congress and	SmartWood does not intend to discount stakeholder preferences regarding formal Wilderness in the ANF. The issue of Wilderness designation is relevant in terms of stakeholder consultation (e.g. Principle 4) and to several other

	clearly our national forests do operate within a political context.	Principles and Criteria used in the test evaluation (e.g. Principle 6 and Principle 9). The peer reviewer's point that designation of Wilderness requires an act of Congress bears emphasis: the ANF staff is limited to evaluation and recommendation. Ultimately, decisions regarding Wilderness are in the hands of the public and their elected representatives in Congress. Text in the Stakeholder table in Section 3.1 and in the Findings for AC 9.1.1 have been revised to explicitly include this important point, and to reflect ANF's recommendations for additional Wilderness Study Areas as a result of the ANF Forest Plan revision.
Pg. 22; OBS 3/06	Regarding the SW quote below: "Since a large set of forest values and services, including local community stability, can only be produced by timber harvest, the ANF could continue to strive to meet AAC and better regulate the forest in terms of the balance of age classes." Certainly there are other resource uses (wildlife; outdoor recreation) that also contribute to community stability. To suggest that these values and services can ONLY be produced by timber harvest is not scientifically defensible.	SmartWood generally concurs with the peer reviewer's comment. Although there are indeed some local benefits that are currently influenced most significantly by timber harvests, most studies have found that "mixed" economies are more stable. In a forest-based economy, for example, timber and recreation provides more economic stability than either of the two alone. The text in OBS 3/06 has been revised accordingly.
Pg. 55; 4.4; Criterion Level Remarks	Criterion level remarks indicate a minor non-conformance with the standard regarding conducting social impact analysis. I can't find any language that indicates where this non-conformance occurs. All the boxes below indicate conformance with the standard. Please clarify.	The indication of non-conformance was an error and has been correctly replaced with a criterion-level designation of conformance.
Pg. 55; OBS 3/06	See Pg. 22 comment above	See corresponding SmartWood Response.
Pg. 66; 6.2; Criterion Level Remarks	Criterion level remarks indicate a minor non-conformance with the standard regarding RT&E species protection. I can't find any language that indicates where this non-conformance occurs. All the boxes below indicate conformance with the standard. Please clarify.	The indication of non-conformance was an error and has been correctly replaced with a criterion-level designation of conformance.
Pg. 100; CAR 8/06	"social effects of management activities including creation and maintenance of local jobs" This is good. I would add, "and other community impacts of forest management activities"	SmartWood agrees that conformance with Criterion 8.1 can be enhanced by expanding CAR 8/06 to include "other community impacts". The CAR has been modified to include the following text: "... as well as other impacts to local communities attributable to ANF forest

		management decisions”.
Pg. 102; 8.2.d.3	You might mention that this is NVUM, the National Visitor Use Monitoring study	The findings for Indicator 8.2.d.3 has been modified to include mention of NVUM as suggested by the peer reviewer.
Pg. 105; AC 9.1.1	Please see my comment from pg. 15 above. I'm not sure how these expressed opinions regarding appropriate lands for wilderness is central to the purpose of this certification process. Surely, if the public wanted to see more acres of the ANF managed as wilderness, they have the power to achieve that through their elected officials.	See corresponding SmartWood response above. As a result of the recent revision of the ANF management plan, Wilderness designation has been recommended for two additional areas totaling approximately 13,000 acres. To date, no congressional action has been taken to formally designate additional Wilderness in the ANF.

ANF Peer Review No. 2

Peer Reviewer: Mark Ducey

Reviewer Specialization: Silviculture, Biometrics

Reviewer Comments:

Test Evaluation Report Quality:

How would you rate the overall quality of the test evaluation report?

High Acceptable Poor

Do team observations and findings clearly support the determination of conformance reached?

Yes No

Comments: No certification decision -- certification outside scope of evaluation. However, observations and findings support overall recommendations.

Areas for improvement:

Editing/Formatting: Comments:

Lack of Clarity: Comments:

Technical Analysis: Comments:

Information lacking: Please indicate areas:

Other comments: Formatting and clarity are exceptional. Report is built on an existing foundation of technical analysis and supporting materials provided by the ANF.

Test Evaluation Process:

Based upon the information in the test evaluation report, do you have any comments on the test evaluation process (i.e. team composition, field time, stakeholder consultation) and the adequacy of fieldwork as the basis for making the determination of conformance?

Comments: Overall, the assessment process appears to have been adequate. Stream crossings were raised as an issue, but none were visited. It is clear that stream crossings are relatively rare on the ANF, and the issue may have emerged after field visits were concluded. The decision re: stream crossings probably did not require an actual field visit; there is an adequate process in place and that was verified by the team and the ANF.

SmartWood Response: As stated in the findings for Criterion 6.5, and in particular indicator 6.5.k, a few streams were encountered during the field visits and "those with streams had them crossed with temporary or permanent bridges and culverts". The team visited one stream crossing on a recently constructed road associated with an OGM well. The team noted stream impacts associated with OGM activities. The findings associated with Indicator 1.1.b were revised for consistency with findings throughout the rest of the report.

Report Conclusions:

Is the determination of conformance by the team justified by the reports observations and findings?

Yes No If no, explain?

Do you agree with determination of conformance of the team? Yes No If no, state reasons why?

Peer Reviewer Comments Table:

Report section	Issue: Disagreement or suggested action	SW Response
Introduction	In the middle of the second paragraph, "In addition, to the test" there should be no comma after <i>addition</i> .	Correction made.
Section 3, Title	"EVALUAITON" is a typo.	Correction made.
Section 3.1, Principle 5, #2	Elsewhere in the report, and in the ANF comments on the draft, it appears that the ANF is not reaching its ASQ. This may have consequences for the long-term sustainable flow of goods, amenities, and habitats from the forest. The ANF comments also suggest this is due to funding limitations within the timber program. The finding that "performance of forest management activities was high, indicating that current funding levels are adequate to sustain the forest" may require revision or qualification.	<p>As the peer reviewer notes, and as stated in Section 3.1 of the report, "many stakeholders feel the forest is not receiving adequate funding for their myriad of activities and the added public pressure attached to everything they undertake."</p> <p>The SmartWood team found ANF's performance of forest management activities in the field to be generally high. Performance at this high level could be taken as an indication that current funding levels are adequate to sustain the forest. But, since the new forest management plan has an ambitious amount of added activities, especially in monitoring, the stakeholder concern may be more applicable to the near future.</p> <p>Key concerns in terms of funding are associated with timber sale planning, preparation and administration and implementation of associated silvicultural activities to develop a regulated forest via balancing of age classes and timber harvesting to meet annual allowable cut, or ASQ. These concerns were recognized by the SmartWood team in findings associated with Principle 5 (e.g. Indicator 5.4.a) and addressed in Observation OBS 3/06. Related socioeconomic implications associated with revenues to counties are addressed in the findings of Indicator 1.2.a and also in Section 4.4 (Socioeconomic Context) of this report. ANF comments to SmartWood regarding OBS 3/06 that they "continue to do as much of the program as is possible given current funding and program levels" and that they "have worked actively with the Region to generate</p>

		<p>additional funds for the timber program” also suggest that ANF staff feel constrained by budgets.</p> <p>In response to the peer reviewers comments, modifications have been made to the SmartWood response to stakeholder comments associated with Principle 5 in Section 3.1, Section 4.4, and to OBS 3/06.</p>
Section 3.2, Strengths and Weaknesses, Principle 6	I concur with the ANF objection to the original draft and commend the team for modifying the final text appropriately.	SmartWood’s initial findings concluded that ANF’s analyses for landscape-level conservation and restoration analyses were not comprehensive and issued a CAR. Comments by ANF pointed out that a comprehensive analysis was completed in 1986 resulting in landscape restoration activities and that several interim landscape level analyses have occurred since the 1986 and have focused on a variety of restoration issues. In response to new information provided in ANF’s comments, SmartWood revised the Findings for Indicator 6.2.DOD/DOE.2 and changed the conformance from “No” to “Yes”.
Observations , OBS 2/06	The ANF commented on the draft that some input was sought from affected employees and others. I concur with the team’s concern on this issue. However, the observation as written implies that input was not sought, which may lead to objection and/or dismissal of the observation. I would suggest rewording to be more specific.	Based on numerous interviews with ANF employees from various parts of the organization, SmartWood has concluded that ANF employees were not consulted prior to the implementation of the centralized business plan. After the plan was announced, many employees expressed dissatisfaction with both the plan and the process. Subsequent to these reactions from employees, there has been considerable internal discussion of the issue, including explanations of why the change was deemed necessary, but decisions had already been made. The centralized business plan has been implemented in phases, and employees have continued to express their dissatisfaction. On the contrary, with respect to forest level project planning, employees and contractors consistently expressed their satisfaction with the opportunities available to them to provide meaningful comment, and that their input is valued and considered. No change to OBS 2/06 is warranted.
Section 3.6, Summary and Conclusion	In the last sentence, “with the later associated with a concern” is a typographic error; substitute “with the <i>latter</i> associated with a concern”	Correction made.

ANF Peer Review No. 3

Peer Reviewer: Anonymous

Reviewer Specialization: Social Science

Reviewer Comments:

Test Evaluation Report Quality:

How would you rate the overall quality of the test evaluation report?

High Acceptable Poor (provide comments below)

Do team observations and findings clearly support the determination of conformance reached?

Yes No

Comments: The observations and findings of the team clearly support the decision reached, and with a few minor exceptions (see below) the CARs and other observations were appropriate responses to the conditions identified in the assessment

Areas for improvement:

Editing/Formatting: Comments:

Lack of Clarity: Comments:

Technical Analysis: Comments: Given the level of concern shown over the issue of Oil and Gas Management (OGM), I thought this area needed more attention

Information lacking: Please indicate areas: (if detail is needed include in the comments table)

Other comments: see below

Test Evaluation Process:

Based upon the information in the test evaluation report, do you have any comments on the test evaluation process (i.e. team composition, field time, stakeholder consultation) and the adequacy of fieldwork as the basis for making the determination of conformance?

Comments: Overall I think the team composition, field time and outreach to stakeholders was generally appropriate. The political environment surrounding debates over management of the ANF are so charged and often dominated by individuals staking out extreme positions on opposite sides of the debate, that perhaps more effort could have been given to putting stakeholder comments and positions into context. I think the approach to fieldwork was also generally well thought out (e.g. focusing on areas with more recent management activity), although once again given the level of concern over OGM issues I thought more fieldwork could have been focused on areas impacted by OGM development, road-building, etc.

Report Conclusions:

Is the determination of conformance recommended by the team justified by the reports observations and findings? Yes No If no, explain?

Do you agree with determination of conformance recommended by the team? Yes No If no, state reasons why?

Peer Reviewer Comments Table:

Report section	Issue: Disagreement or suggested action	SW Response
<p>Criteria 6.5.a, 6.5.i and other sections of Appendix III</p>	<p>The issue of OGM in general, and the impact of OGM activities on water quality in the ANF were probably the top concern based on stakeholder comments. Therefore, I would have expected more discussion of this issue in the report beyond the focus on ANF making greater attempts to determine ownership of O&G leases. For example, what else (beyond what is already being done) could/can the ANF do to regulate the impacts of OGM on water quality? Is there any discussion of having the ANF purchase more of the O&G leases? To what extent could OGM activities by other parties compromise FSC certification of the ANF? Etc.</p>	<p>The issues associated with OGM are important on the ANF and are being treated as so by the ANF (and by SmartWood in this test evaluation report). That ANF does not control the sub-surface rights on the overwhelming majority of the lands they manage undoubtedly adds a significant element of complexity. In recognition of this challenge, ANF has created an OGM Task Force to investigate strategies to better manage the forest in conjunction with OGM activities. The draft document entitled "Allegheny National Forest Oil, Gas and Management, 2006 Action Plan for Improved Efficiency and Effectiveness" proposed by the OGM Task Force delineates how the ANF can better manage the forest in conjunction with OGM activities.</p> <p>OGM issues were broadly represented in the report, with some examples as follows:</p> <ul style="list-style-type: none"> ▪ general recognition as a key issue - two days were spent working on forest areas that were representative of key environmental issues identified during the pre-test evaluation (Section 2.5); ▪ a summary description of the scope of the issue and acknowledgment of the associated difficulties (Section 4.4) ▪ explanatory response to stakeholder comments (Section 3.1, Principle 6 comment #1); ▪ reviews of, and references to, key OGM-related documents, such as "Erosion & Sedimentation Control Plan; Oil and Gas Well Development" plans that are reviewed by the ANF prior to development of a well site, and the draft document titled "Allegheny National Forest Oil, Gas and Management, 2006 Action Plan for Improved Efficiency and Effectiveness" proposed by the ANF OGM Task Force (see findings associated with Indicator 2.1.a); ▪ stakeholder concerns in the context of disputes regarding tenure rights (Indicator 2.3.b);

		<ul style="list-style-type: none"> ▪ mitigation of negative effects (Indicator 4.4 DOD/DOE 3); ▪ reference to concerns with OGM in the future, especially in association with water quality (Criterion 5.5); ▪ specific reference to OGM and water quality (6.5.i); ▪ expressed concern over the lack of a working list of OGM rights owners (findings and OBS associated with Indicator 7.1.b.3); ▪ issues of OGM in HCVFs and the purchase of OGM rights in the Tionesta Research Natural Area (Criterion 9.3). <p>SmartWood concurs with the peer reviewer that the OGM issues are challenging on the ANF, and that the future approach to these issues could have a bearing on ANF's ability to conform with FSC standards in the future. With rising oil prices seen over the past several years, the number of wells, and therefore the potential to affect the ANF forest, is expected to increase. The issue of OGM was discussed at length between SW and the ANF during both the pre-test evaluation (October-November 2005) and the test evaluation (reported herein). A preponderance of field site visits were made to OGM sites (17%, or 4 of 23 sites visited) during the test evaluation.</p> <p>While the questions put forth by the peer reviewer are pertinent to the issue of OGM on ANF, their address falls outside the purview of this test evaluation. SmartWood does not disagree with the importance of these questions, however in the narrow role of auditing conformance to the standards adopted for this test evaluation, for SmartWood to speculate on additional measures that could be taken by ANF to address the potential for negative environmental and social impacts in the forest would not be appropriate.</p> <p>The SmartWood response to the stakeholder comment associated with Principle 6 has been modified to further acknowledge the difficulty of this situation and the real potential for negative consequences with a continued increase in OGM activity on ANF.</p>
Section 2.5	What is the likelihood that the PLRMP will undergo significant revision in terms of measures like AAC, management of oil	SmartWood can only evaluate conformance in the context of the plan in effect at the time of the test evaluation. Until the preferred

	and gas leases, and other issues? How would this affect the certification recommendation?	alternative for the PLRMP is known - and ANF is evaluated in the context of the new Plan - it is not known how any revisions that occur relative to the important issues identified by the peer reviewer would affect the determination of conformance.
Criterion 2.3.a of Appendix III	The example of effective communication with the SNI and a few other groups was used to illustrate conformance in this area. It was also suggested that the number of lawsuits were not out of character for a forest the size of the ANF. However, I think there are few forests in the US with the level of acrimony between groups such as that seen in the ANF, and the result is that the public debate over management issues is usually dominated by "extremists" on both sides. I'm not sure that the level of intensity of this debate was communicated in the report, nor was the danger that continued lawsuits and other disputes could have on forest management decisions considered adequately. It's difficult to see how the ANF can move closer toward the AAC (criterion 5.6.a) given this situation.	SmartWood does not have information on how the number of timber sale appeals and other lawsuits brought against the ANF compares to other national forests, however, the team was not surprised by the number of lawsuits brought against the ANF nor the level of debate on how the forest should be managed. Stakeholder input was a key tool used by the SmartWood team to identify important issues. The results of stakeholder consultations including a survey, a public meeting and interviews with stakeholders are presented throughout the report and summarized in Section 3.1. Timber harvesting on national forests is widely recognized as a contentious issue across the nation. One consequence of the ongoing debate over timber harvesting on national forests is a continuing escalation in the cost of preparing and administering timber sales, and difficulty in adequately budgeting for these costs. SmartWood concurs that the ANF (and other national forests) could continue to struggle in meeting their ASQ given the history of controversy over timber harvesting on national forests. Text in Section 4.4 describing the has been enhanced to include a description of the intensity of the public debate on national forests as mentioned by the peer reviewer.
Additional consideration 6.1.1 (p. 65)	For at least some information on pre-settlement conditions in the ANF region, see: <ul style="list-style-type: none"> Whitney, G.G. 1990. The history and status of the hemlock-hardwood forests of the Allegheny Plateau. <i>Journal of Ecology</i> 78:443-458. Whitney, G.G. 1999. Sugar maple: Abundance and site relationships in the pre- and post-settlement forest. In R. P. Long and S. G. Horsley (eds.). <i>Sugar Maple Ecology and Health: Proceedings of an International Symposium</i>, pages 14 – 18. USDA Forest Service General Technical Report NE-261. 	SmartWood concurs that the listed publications is informative. The SmartWood lead auditor is familiar with these four publications – having read each of them – as well as others addressing the issue of pre-settlement conditions on the ANF.

	<ul style="list-style-type: none"> Whitney, G.G. and J. DeCant. 2001. Government Land Office surveys and other early land surveys. Pages 147 – 172. In D. Egan and E. Howell (eds.). <i>The Historical Ecology Handbook: A Restorationist's Guide to Reference Ecosystems</i>. Washington, DC: Island Press. Whitney, G.G. and J. DeCant. 2003. Physical and historical determinants of the pre- and post-settlement forests of northwestern Pennsylvania. <i>Canadian Journal of Forest Research</i> 33:1683-1697. 	
Criterion 6.5.s of Appendix III	Findings should read "Current ANF policy for harvest does not prohibit harvest within the inner SMZ on high-quality waters"	Correction made.

Reviewer Comments: Overall I found this report to be well-researched and the conclusions reached to be well-founded. Given the status of the ANF as a federal land unit and all the regulations, environmental considerations, and need for transparency that follows from that it was not too surprising that the ANF was found to be in conformance with almost all of the relevant FSC principles and criteria. In those areas where minor non-conformance issues were raised, clear guidance was provided for the ANF to follow in order to mitigate the problem.

My only concern was that the report appeared to play down a little the apparent level of mistrust and acrimony that exists between a small number of stakeholders active in the debate over management of the ANF. While controversy over the ANF has "settled down" a little in the last few years, it could easily flare up again in the form of lawsuits and other actions that could impinge on the ability of the ANF to carry out forest management activities (such as achieving an AAC). It was not clear to me from the report how much of an issue this was thought to be and what, beyond public forums and receipt of comments, the ANF was doing to address this. This has specific relevance to criterion 2.3. While I appreciate the difficult situation that the ANF and its staff are placed in as a result of these disputes, and the fact that almost anything they do on the ANF will be perceived by more extreme elements as either too extractive or too restrictive on logging and mineral extraction, I wonder if a more proactive approach of some sort is called for in this situation.

APPENDIX IX: SmartWood Additional Considerations

A total of 17 Additional Considerations have been developed from special concerns that were expressed by targeted stakeholders through a survey distributed by SmartWood in October 2005 and again in March of 2006. Stakeholders were asked to provide input on the applicability and adequacy of the FSC standards to address any considerations that are unique to the National Forest System. These special concerns relate to perceived limitations of the FSC standards [FSC Appalachia Region Standards and FSC Department of Defense (DOD)/Department of Energy (DOE) standards] for evaluating ANF forest management operations.

The resulting Additional Considerations have been incorporated into the Test Evaluation of the ANF. SmartWood/PwC have evaluated ANF's performance against these Additional Considerations in a manner consistent with the auditing protocol employed for all other indicators included in the Test Evaluation with the exception that Corrective Action Requests have not been issued for Additional Considerations.

Additional Considerations are also integrated within Appendix III: Test Evaluation Conformance Checklist. Within Appendix III, the Additional Considerations are located beneath the corresponding Criterion in the FSC Standard.

Summary of ANF Test Indicators

AC 1.1.1. By policy and action, managers of National Forests shall demonstrate compliance with applicable federal laws and administrative requirements (e.g., NEPA, ESA, Clean Water Act, NFMA, MUSYA, The Wilderness Act, Wild and Scenic Rivers Act, Organic Act, CFR, Title 7, applicable sections of the US Code, the Forest Service Manual, and Forest Service Handbooks).

AC 1.1.2. Managers of National Forests shall comply with state, county, local and municipal laws except where federal law preempts state, county and local laws. When federal laws preempt compliance with those of other jurisdictions, corresponding statutes or regulations shall be specifically referenced and described.

AC 3.2.1. Solicitation of tribal collaboration is tailored to incorporate cultural sensitivity and awareness and to honor nation-to-nation relationships.

AC 3.2.2. Consultation techniques used for soliciting tribal input are adapted as necessary to achieve effective communication and collaboration.

AC 4.1.1. A comprehensive listing of all applicable laws, regulations and administrative requirements and their applicability to USFS forest management shall be maintained with listed documents made accessible to all employees.

AC 4.1.2. Migrant worker conditions (including transit to and from work sites) are monitored by both contractors and Forest Service personnel for compliance with USDA Forest Service policies and contract specifications, applicable labor laws and other associated regulations.

AC 6.1.1. Managers of National Forests use available science and information to prepare a written description of the historic range of variability of forest conditions and disturbance regimes.

For example:

- *Description of the intensity, distribution, frequency, size, resulting landscape patterns, and residual stand structures of the major disturbance regimes.*

- *Description of the historic range of variability of estimated composition of forest cover types, typical age class distribution, and estimated stand structures.*

AC 6.1.2. The description of the historic range of variability of forest conditions is made available for public review and comment prior to its use in management decisions.

AC 6.1.3. Current forest conditions are compared at the landscape scale with the historic range of variability of forest conditions. Measures of current forest condition include, but are not limited to:

- Area, composition (e.g., species and age class distribution) and spatial representation of ecological types including old growth and late seral forests;
- Composition and distribution of habitat-related structural elements (e.g. snags, den trees, mast trees, coarse woody debris, thermal and hiding cover).

AC 6.1.4. The effects of management activities on neighboring lands are included in the scope of environmental impact assessments on National Forests.

AC 6.2.1. A comprehensive list of the species of interest and species of concern (e.g., species with notable conservation need) is maintained for each National Forest. Managers demonstrate through policies and actions that said species are duly considered in the course of forest management.

AC 6.3.b.1. Connectivity between wildlife habitats and associated landscape features (such as HCVF's) is considered while implementing even-aged timber management on National Forests.

AC 6.3.b.2. Forest management practices maintain or restore aquatic ecosystems and habitat features, wetlands, and forested riparian areas (including springs, seeps, fens, and vernal pools).

AC 6.5.1. Where federal, state, county and local BMP guidelines, recommendations, and regulations provide several options, the most effective measure is applied.

AC 6.9.1. Managers of National Forests identify high risk activities by which invasive exotic plants become established. Control mechanisms are implemented for high risk activities associated with Forest Service management responsibilities.

AC 9.1.1. By policy and action, managers of National Forests shall demonstrate compliance with Section 2(c) of the Wilderness Act and the Wild and Scenic Rivers Act in the course of identifying and designating HCVF.

AC 9.1.2. National Forest managers review and consider use of existing HCVF planning tools (e.g., Proforest HCVF Tool Kit, Canadian National Framework for HCVF) in the development of a process for identifying HCVF.

APPENDIX X: FMO map