

SGS QUALIFOR

(Associated Document)

Doc. Number:	AD 36-A-03
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1 SCOPE OF CERTIFICATE

The scope of the assessment falls within the Temperate Forest Zone and includes 3 Forest Management Units (FMUs) as described below.

FOREST MANAGEMENT CERTIFICATION REPORT

SECTION A: PUBLIC SUMMARY

Project Nr: 600320

Client: National Forests of Florida

Web Page: http://www.fs.fed.us/r8/florida/projects/

325 John Knox Road

Address: Tallahassee, Florida 32303

Country: USA

Certificate Nr. n/a Certificate Type: Forest Management

Date of Issue n/a Date of expiry: n/a

Forest Zone: Temperate

Total Certified Area 1,179,041 acres

Scope: Forest Management of forests & plantations in the state of Florida USA for the production of

softwood/hardwood timber and other resource values:

Appalachiachola National Forest

Oceola National Forest
Ocala National Forest

Company Contact

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Evaluation dates:		
Main Evaluation	February 12-16, 2007	
Surveillance 1	n/a	
Surveillance 2	n/a	
Surveillance 3	n/a	
Surveillance 4	n/a	

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AD 20:	Evaluation Itinerary	
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AD 36-B:	Evaluation - Observations and Information on Logistics	
AD 38:	Peer Review Report	
AD 40:	Stakeholder Reports	
	Evaluation team CV's	
	List of stakeholders contacted	

Complaints and Disputes

Procedures for submitting complaints, appeals and disputes, and the SGS processing of such are published on www.sgs.com/forestry. This information is also available on request – refer contact details on the first page.

INTRODUCTION

The purpose of the evaluation was to evaluate the operations of the National Forests of Florida against the requirements of the QUALIFOR Programme, the SGS Group's forest certification programme accredited by Forest Stewardship Council.

1. SCOPE OF CERTIFICATE

The scope of the certificate falls within the Temperate Forest Zone and includes 3 of Forest Management Units (FMUs) as described below.

Description of FMUs:				
Description	Ownership	Area (ha)	Longitude E/W	Latitude N/S
Apalachicola 565,688 ac	USDA Forest	228,933	84.28 W	30.47 N
Osceola 162,628 ac plus	Service	65,816		
(Pinhook Purchase Unit 44,338 ac)		17,944		
Ocala 383,584 ac		155,236		
Ocaia 303,304 ac				
Total: 1,156,238 acres		467,930		

Size of FMUs:			
	Nr of FMUs	Area (ha)	
Less than 100ha			
100 to 1000 ha in area			
1001 to 10000 ha in area			
More than 10000 ha in area	3	467,930	
Total	3	467,930	

Total Area in the Scope of the Certificate that is:	
	Area (ha)
Privately managed	
State Managed	467,930
Community Managed	

Composition of the Certified Forest(s)		
	Area (ha)	
Area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives	147,157	
Area of forest protected from commercial harvesting of timber and managed primarily for production of NTFPs or services		
Area of forest classified as "high conservation value forest"		

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Composition of the Certified Forest(s)	
	Area (ha)
Total area of production forest (i.e. forest from which timber may be harvested)	256,311
Area of production forest classified as "plantation"	
Area of production forest regenerated primarily by replanting	
Area of production forest regenerate primarily by natural regeneration	

List of High Conservation Values		
Description	Notes	
Pinhook Forest	Connectivity with Okefenokee NWR	
Old Growth Forest on Apalachicola NF (14,278 ha)	Old Growth designations are included in the Management Area Desired Future Conditions (DFCs) on Ocala and Osceola NF	
Longleaf Pine Wiregrass Ecosystem	Red-cockaded Woodpecker Habitat	

Timber Production				
Species (botanical name)	Species (common name)	Area (ha)	Maximum 7-year Sustainable Yield (m³)	
			Projected	Actual
Pinus elliotii	Slash Pine			
Plnus clausa	Sand Pine			
Plnus palustris	Longleaf Pine			
Totals			103 MMCF 44 MMCF	

List of Timber Product Categories		
Product	Notes	
Slash and Longleaf Pine pulpwood and sawtimber	Sold as standing timber (stumpage)	
Sand Pine pulpwood	Sold as standing timber (stumpage)	
Totals		

Approximate Annual Commercial Production of Non-Timber-Forest-Products				
Product	Species		Unit of measure	Total units
	Botanical Name	Common Name)		
Decorative Moss	Cladonia spp.	Deer Moss	lbs	1,780
Firewood	Quercus spp.	oak	CCF	321
Pine Boughs	Pinus spp.	Pine	Pieces	32,000
Pine straw	Pinus spp.	Pine	Bushels	3
Palmetto berries and	Serenoa sp	Palmetto	Lbs	20,000
fronds			pieces	30,000
Plants	various	various	Lbs	4,004

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Approximate Annual Commercial Production of Non-Timber-Forest-Products				
Product	Species		Unit of measure	Total units
	Botanical Name	Common Name)		
			pieces	6,221
Poles	various	various	Pieces	505
Crooked Wood	Various	Various	Pieces	84,450
Christmas trees	Pinus spp.	Pine	pieces	139

2. COMPANY BACKGROUND

2.1 Ownership

The National Forests in Florida are owned by the United States and administered by the USDA Forest Service.

2.2 Company Key Objectives

Objective	Notes
Commercial	
Harvest up to 103 million cubic feet of wood in ten year planning period.	
Restore Longleaf Pine – Wiregrass Ecosystem	
Social	
Contribute to the social and economic well being of communities by promoting sustainable use of renewable natural resources and participating in efforts to devise creative solutions to economic health.	Payments to counties and rural development programs.
Provide a variety of recreational opportunities including hunting, fishing, hiking, camping, horseback riding and boating.	Amenity values for local residents and visitors.
Provide Wilderness, Wild and Scenic River, Scenic Byway, Special Designation Area opportunities.	
Environmental	
Maintain or, where necessary, restore ecosystem composition, structure, and function within the natural range of variability in all ecosystems, with emphasis on longleaf pine-wiregrass, sand pine-oak scrub, pine flatwoods, hardwood/cypress, oak hammock ecosystems, and other imperiled specialized communities.	
Manage floodplains, groundwater, lakes, riparian areas, springs, streams, and wetlands to protect or enhance their individual values and ecological functions.	
Conserve and protect important elements of diversity such as endangered and threatened species habitat, declining natural communities, and uncommon biological, ecological, or geological sites.	

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Objective	Notes
Manage for habitat conditions to recover and sustain viable populations of all native species, with special emphasis on rare species.	

2.3 Company History

The National Forests of Florida consist of three National Forests: The Ocala, Osceola and Apalachicola. The Ocala is the oldest National Forest east of the Mississippi River and was established in 1908. The Osceola was established by Herbert Hoover in 1931 and the Apalachicola in 1936. All three forests were combined administratively in 1936 as the National Forests in Florida.

Apalachicola National Forest (NF) is a large area of public forestland in Florida's ``panhandle." It is adjacent to the city of Tallahassee. This forest is characterized by vast flatwoods and sandhills of longleaf, slash, and loblolly pine forests; and it is home to the largest known population of the endangered red-cockaded woodpecker. These fire dependent ecosystems are maintained by the largest prescribed burning program on national forests in the nation. The landscape is threaded by bay, cypress, and *titi* swamps, seepage bogs, and open savannahs rich with endemic plant species. The Apalachicola River borders the forest to the west; and the scenic Ochlockonee, Sopchoppy, and New Rivers meander through the forest on their journey to the Gulf of Mexico. The underlying geology provides numerous sinkholes and one of the longest known underground water cavern systems in the world.

Special attributes found on the forest are the Apalachee Savannahs Scenic Byway, Trout Pond Recreation Area (specifically designed to accommodate persons with disabilities), Munson Hills Off-Road Bicycle Trail (the first trail in the Southern Region designed specifically for mountain bikes), Florida National Scenic Trail (its longest stretch extends through wilderness on this forest), and a municipal airport within the forest boundary. Uses of the forest range from timber harvesting to worm ``grunting" to tupelo honey production.

Choctawhatchee National Forest was established in 1908 and managed by the Forest Service until 1940, when all lands were transferred to the War Department. Most of this land is now Eglin Air Force Base. Land may be restored to national forest status when it is no longer needed for military purposes. About 1,100 acres have been transferred to the Forest Service. Most of this land is under special-use permit to State and county governments. This forest is administered by the Apalachicola Ranger District.

Ocala National Forest, the oldest national forest east of the Mississippi River within the continental United States, is noted for its sand pine scrub ecosystem. The rolling hills contain the largest concentration of sand pine in the world. Growing on deep, prehistoric sand dunes, the sand pine scrub is home to the threatened Florida scrub-jay, sand skink, and Florida *bonamia* plant. Within this sea of sand pine, longleaf pine islands provide a different view with open, parklike stands of trees over grassy plains. Wildlife species of interest include the bald eagle, Florida black bear, Florida manatee, gopher tortoise, indigo snake, and red-cockaded woodpecker.

The forest's porous sands and largely undeveloped character provide an important recharge for the Floridan aquifer. Freshwater springs produce several hundred million gallons of water each day. Crystal clear springs, pothole marshes, and sinkhole lakes provide year-round recreational opportunities and unique aquatic habitats. A subtropical environment and a location near Disney World make the Ocala NF a popular destination for thousands of visitors from the United States and abroad.

Osceola National Forest is a mosaic of low pine ridges separated by cypress and bay swamps. Located near the crossroads of I-10 and I-75, this forest is within an hour's drive of more than one million people. The local population, as well as the residents of Jacksonville and Gainesville, enjoys the recreation that centers around Ocean Pond, a shallow, natural lake. Facilities are available for boating, camping, picnicking, and swimming. A 22-mile segment of the Florida National Scenic Trail passes through the Osceola NF, with many boardwalk sections traversing gum swamps and cypress ponds.

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The Big Gum Swamp Wilderness provides 13,500 acres in which visitors can enjoy a challenging, natural setting.

History plays an important role on the Osceola NF. The historic Olustee Depot and the Trampled Track interpretive trail give a glimpse at the rich history of the forest. Remnants of old railroad grades, used to move logs to sawmills, crisscross the forest. Osceola NF has been known for its ability to produce high-quality timber. Olustee Experimental Forest was established in the 1930s to provide research for the naval stores industry. Trees across the forest were tapped for resin, and remnants of old turpentine camps can be found in the forest. The annual reenactment of the Battle of Olustee, the largest Civil War battle fought in Florida, attracts thousands of visitors each February to the Olustee Battlefield.

The northern portion of the forest is characterized by Pinhook Swamp and Impassable Bay. These wetland ecosystems link the forest to Okefenokee Swamp and form the headwaters of the Suwannee River and St. Mary's River. The area provides important habitat for many plants and animals and is a potential reintroduction site for Florida panthers.

2.4 Organisational Structure

The National Forests in Florida are administered out of the Supervisor's Office in Tallahassee, Florida. There are District Ranger offices on each of the three national forests. The Forest Supervisors office has a Supervisor and Deputy, and Staff Officers that coordinate the overall management of the NFF. Forest level positions such as Forest Engineer, Ecosystem Staff Leader, Fire Management Officer, and Forest Archaeologist are found here. District Rangers provide the leadership to run the district organizations that include staff such as Foresters, Silviculturist, Wildlife Biologists, NEPA Coordinators, Outdoor Recreation Specialists, Business Management Specialists, Timber Sale Administrator, Fire Management Officers and crews, and a variety of technicians, forest workers and volunteers.

2.5 Ownership and Use Rights

The NFF customarily consult with local communities, citizens and Native American tribes of proposed management activities. Tribes are consulted in case a proposed action may affect lands considered sacred or special by the tribes. This is a routine feature of NEPA analysis and public involvement.

Residents, organizations, businesses and other entities can obtain a special use permit for things such as removing forest products or a Right of Way across NFF lands if this is in the best interest of all parties.

2.6 Other Land Uses

Hunting and fishing are popular activities conducted on NFF lands and waters and are jointly managed by the NFF and Florida fish and wildlife agencies. Harvesting small amounts of forest products by citizens is allowed. Larger amounts of forest products are sold to the highest bidder who is qualified to do the work and the contract is administered by timber sale administrators. Some grazing permits are issued on the Appalachicola NF. Outfitter-Guide permits are required by commercial tour operators who conduct business on NFF lands.

2.7 Non-certified Forests

None of the NFF lands are currently certified.

3. GROUP MANAGEMENT

Not relevant

4. FOREST MANAGEMENT SYSTEM

4.1 Bio-physical setting

The National Forests in Florida lie within the humid temperate domain, subtropical division, and outer coastal plain mixed forest province. At the next lower levels, the Apalachicola National Forest (NF) lies within the

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Florida Coastal Lowlands western section and the Coastal Plain and Flatwoods lower section. Subsections include Gulf Coastal Flatwoods, Southern Coastal Plains, and Gulf Southern Loam Hills. The Osceola NF lies within the Atlantic Coastal Flatwoods section. Subsections include the Upper Terraces, Okefenokee Uplands, and Okefenokee Swamp. The Ocala NF lies within the Coastal Plains and Flatwoods lower section and the Central Florida Highlands subsection.

Geography:

From the northwest corner of the state, the Florida Uplands run about 275 miles west to east, along the northern edge of the Florida Panhandle and then extends south into the central area of the Florida peninsula. The width of the northern Florida Uplands varies from around 30 to 50 miles and is characterized by low rolling hills of red clay. Hard and softwood forests are plentiful. The section of the Florida Uplands that extends south into the peninsula, covers an area about 100 miles wide and 160 miles long. This area extends from the north, south and to the east, to separate the two sections of the East Gulf Coastal Plain and to separate the East Gulf Coastal Plain from the Atlantic Coastal Plain. The landscape in the southern Florida Uplands is characterized by low hills and many lakes. Though the Florida Uplands are only 200-300 feet above sea level, they are still higher than the regions of the Atlantic Coastal Plain and the East Gulf Coastal Plain. The highest point in Florida is found in the Florida Uplands that run along the northern edge of the panhandle.

Ecology:

Vegetation Classification: Northern Florida has a variety of natural communities and a variety of classification systems. The Florida Natural Communities Guide published by the Florida Department of Natural Resources is one of the primary classification systems. Some of the more common natural communities include Xeric Uplands - very dry, deep, well-drained hills of sand with xeric-adapted vegetation. Mesic Uplands are dry to moist hills of sand with varying amounts of clay, silt or organic material; diverse mixture of broad leaved and needle leaved temperate woody species. Mesic Flatlands are flat, moderately well-drained sandy substrates with admixture of organic material, often with a hard pan. Wet Flatlands are flat, poorly drained sand, marl or limestone substrates.

Climate: Northern Florida has a humid temperate climate with an average annual rainfall of 50-60 inches. Thunderstorms are common and damaging hurricanes occur annually. Monthly average temperatures range from a high of 91.7 degrees to a low of 39.9 degrees. The lowest temperature in Florida, -2°, was recorded on February 13, 1899 at Tallahassee. The highest temperature recorded in Florida is 109°, Fahrenheit. This record high was recorded on June 29, 1931 at Monticello.

4.2 History of use

The Apalachicola and Osceola National Forests are dominated by Longleaf Pine – Wiregrass forests. These forests were described by early travellers as open, park-like stands of pines with a grassy understory. Anthropogenic activities within the last century have greatly fragmented these forests. Timber activities removed over 90 percent of the mature pines in the 1920's and altered the structural complexity of the understory that was originally characteristic of the natural ecosystem. The Ocala National Forest had similar anthropogenic activities and fires in the sandy Slash Pine forests.

4.3 Planning process

- The NFF is governed by the National Forest Management Act which requires a comprehensive Forest Plan. The Forest Plan is developed with pubic involvement under the National Environmental Policy Act. The Forest Plan has Goals and Desired Future Conditions both forestwide and in its designated Management Areas. Policy such as rotation lengths of forest types for sand or longleaf pine are described for these management areas. Financial planning is based on annual Congressional appropriations which may vary considerably from year to year.
- The NFF uses an Adaptive Management philosophy to develop and revise policies and operating
 procedures. Annual monitoring reviews and reports, research, field studies, and evaluation reports are
 utilized. The revised policies are uniformly applied across the three forests by program leaders and
 other staff.
- The NFF use a comprehensive monitoring program to assess progress in meeting Forest Plan goals and objectives.

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4.4 Harvest and regeneration

- Stand establishment can be natural or planted depending on site specific conditions and management intent. Planting stock such as longleaf pine seedlings or containerized stock is available as is seed for sand pine. Machine and hand planting, row seeding, prescribed fire and mechanical and herbicide treatments are used to create suitable stocking and growing conditions.
- Maintenance and improvement using prescribed fire is commonly used. Thinning to improve stand
 quality is used in certain stands to improve quality, maintain stocking levels for red-cockaded
 woodpecker habitat and to provide forest products.
- Forest inventories are conducted to determine stand conditions, stocking levels, possible treatments
 and for other reasons. Inventory levels are determined by management area with those having a timber
 production goal having more comprehensive surveys than Wilderness.
- Yield prediction used detailed models is routinely used for the Forest Plan and harvesting prescriptions.
- A small amount of road building occurs under the direction of the Forest Engineer in suitable locations.
 Road maintenance funds are limited and occur primarily as a result of public safety and access needs and as a result of timber harvest operations.
- Harvesting operations are conducted in suitable management areas under the requirements of NEPA. Treatment methods include clearcutting, shelterwood, thinning and group and individual tree selection.
- Harvesting operations are conducted by contractors under the supervision of timber sale administrators.

4.5 Monitoring processes

Monitoring is an active and ongoing process on the NFF. An annual monitoring report is provided to the public and every five years a consolidated five year report comes out. Monitoring is done at all levels of the NFF. Task sheets are used to identify the goal, objective, standard, monitoring question, frequency, reliability, who collects and the method of collection.

For example: conclusions about population trends for MIS species and their relationship to habitat are developed through a variety of approaches (page E-48). The approaches include:

- 1. Measurement of habitat conditions and trends (i.e. the amount and condition of habitat over time) for species for which the relationship between population measures and habitat are well known so that trends in habitat provide a reliable indication of population trends.
- 2. The use of population occurrence and presence/absence data to improve knowledge of species distribution, relative abundance, and habitat relationships. These measures repeated over time, may provide information on trends in distribution and relative abundance.
- 3. The use of population indices to track relative population trends. These indices are not actual population estimates, but are aimed at reflecting trends or possibly relative abundance for a species. Examples could include state hunting/fishing information, track counts, and bird point counts. Some of this information may also be useful in validating species/habitat relationships.
- 4. Actual population estimates and demographic information based on 100% population counts or sampling. This is the most intensive and rigorous methodology usually reserved for some federally listed species or high risk globally impaired species selected as MIS.
- 5. Development of research studies with the objective of determining species/habitat relationships, and species response to the types of habitat change created through land management activities.

5. SOCIO-ECONOMIC AND ENVIRONMENTAL CONTEXT

5.1 Social aspects

Number of own workers	Approximately 210

Number of contract workers	Varies greatly by season and if there is a forest fire or hurricane recovery effort
Minimum daily wage for agricultural/forestry workers	Varies from Federal Minimum Wage to Davis-Bacon Wage Act to General Salary and Wage Grade wages
Infant mortality rates (under 5 years)	As of 2005 for Florida, 7.2 per 1,000 live deaths, U.S. it is 6.7 per 1,000
Proportion of workers employed from the local population (%)	Accurate information not available.

As the population of Florida increases, the Ocala National Forest is an island among development encroaching from all sides. Its central location provides a close drive for 8-10 million people who live in neighboring cities, such as Jacksonville, Tampa, and Orlando, to seek out the Forest as a place of recreational value. Along with this increase in the number of visitors come other urban issues you might not ordinarily find in this seemingly rural setting. For instance incidents such as the murder of two college students, methamphetamine labs in crowded recreation areas and people living on the forest make visitors question the safety of their recreation experience. Other problems range from dumping to motorized use to squatters and other illegal activities. Ethnic composition of the The Apalachicola National Forest staff is: white-73.4%, black-18.7%, hispanic-3.7%, other-1.9%.

5.2 Environmental aspects and issues

The principle biodiversity conservation problem in the region is the spread of invasive species. Additional issues include loss of habitat and fragmentation in adjacent areas of the forest that decrease the habitat available for wildlife. Roads and travelways lead to increasing fragmentation on the forest. The lack of adequate funding to implement restoration and management programs is also an issue.

The principle biodiversity conservation initiatives underway on the NFF include restoration of the Longleaf Pine –Wiregrass Ecosystem, Red-cockaded Woodpecker and Florida Scrub Jay habitat restoration, Pinhook Swamp acquisition, and the protection of PETS and natural areas.

The following Summary of Issues is include in section 1.4 of the Forest Plan (RLRMP). These issues were developed by the USFS through public involvement and used to develop alternatives for the Forest Plan revision.

How much and by what methods should the longleaf pine-wiregrass community be restored and maintained?

How should we maintain the sand pine-scrub oak community?

How should we manage and protect riparian and wetland areas?

How should special aquatic, botanic, geologic, historic, paleontological, and scenic areas be protected and managed?

What lands should be designated as wilderness, and what practices should be permitted in these areas?

What types, amounts, and mix of recreational opportunities should be provided, and what consideration should be given to compatibility of users?

What should be the access policy for motorized vehicles?

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What is the proper combination of open and closed roads to meet public needs?

How should we manage habitat to enhance certain wildlife populations such as game and proposed, endangered, threatened, and sensitive species?

What will be the level of timber harvest, and what silvicultural systems will be used to manage the forests?

What types of other forest products will be gathered and what uses will be permitted on the national forests?

How much and by what methods should the longleaf pine-wiregrass community be restored and maintained?

How should we maintain the sand pine-scrub oak community?

How should we manage and protect riparian and wetland areas?

How should special aquatic, botanic, geologic, historic, paleontological, and scenic areas be protected and managed?

What lands should be designated as wilderness, and what practices should be permitted in these areas?

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How should we manage habitat to enhance certain wildlife populations such as game and proposed, endangered, threatened, and sensitive species?

What will be the level of timber harvest, and what silvicultural systems will be used to manage the forests?

What types of other forest products will be gathered and what uses will be permitted on the national forests?

5.3 Administration, Legislation and Guidelines

The FEIS and Revised Forest Plan were developed according to the National Forest Management Act (NFMA), it implementing regulations, 36 Code of Federal Regulations (CFR) 219, National Environmental Policy Act (NEPA), and the Council of Environmental Quality (CEQ) regulations, 40 CFR 15001508. The FEIS discloses the environmental consequences of the alternative management strategies and how the NFF respond to issues and concerns.

The NFF works closely with other agencies including the US Fish and Wildlife Service, Environmental Protection Agency and equivalent State of Florida agencies.

The following table lists the key national legislation, regulations, guidelines and codes of best practice that are relevant to forestry in the commercial, environmental and social sectors. This list does not purport to be comprehensive, but indicates information that is key to the forestry sector.

Legislation and regulation	Notes
National Environmental Policy Act (NEPA)	The National Environmental Policy Act (NEPA) requires federal agencies to integrate environmental values into their decision making processes by considering the environmental impacts of their proposed actions and reasonable alternatives to those actions.
Endangered Species Act	The Endangered Species Act provides a program for the conservation of threatened and endangered plants and animals and the habitats in which they are found.
National Forest Management Act	The NFMA is a federal law that is the primary statute governing

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	the administration of national forests and was an amendment to the Forest and Rangeland Renewable Resource Planning Act. It requires the Secretary of Agriculture to assess forest lands, and develop and implement a resource management plan for each unit of the National Forest System.
Multiple Use – Sustained Yield Act	The MUSYA authorized the Forest Service to manage national forest system lands for additional purposes, and required the Forest Service to manage for multiple use and sustained yield of the products and services of the forests.
Wilderness Act	The Wilderness Act is a federal law that created the National Wilderness Preservation System and is the principle law for designating Wilderness on federal lands.
Guidelines and Codes of Best Practice	Notes
NFF Forest Plan: Chapter 3 Forestwide Standards and Guidelines	Designates forestwide standards and guidelines.
NFF Forest Plan: Chapter 4 Management Area Goals, Desired Future Condition, Standards and Guidelines	Designates management area standards and guidelines and the desired future condition.
Florida Best Management Practices	State of Florida approved practices to prevent soil erosion and protect

6. CHANGES IN MANAGEMENT, HARVESTING, SILVICULTURE AND MONITORING Not applicable

7. PREPARATION FOR THE EVALUATION

7.1 Schedule

The Evaluation was preceded by a pre-evaluation by SGS QUALIFOR during January 8-9, 2007. This examined the management systems and identified any gaps that might preclude certification. Information gathered was used to plan the main evaluation. Key stakeholders were identified.

7.2 Team

The table below shows the team that conducted the <u>main evaluation</u> and the independent specialist(s) that were selected to review the main evaluation report <u>before certification</u> is considered.

Evaluation Team	Notes
Team Leader	Has a degree from the University of Maine (1982) and 24 years of professional experience. He is qualified as an ISO 14001, EMS lead auditor, and is an SAF Certified Forester [®] , and Certified Forest Auditor [®] , and Qualifor (FSC) Programme Auditor. He is a Licensed Professional Forester (ME & NH), a Licensed Commercial Master Pesticide Applicator, and serves on Maine's Board of Pesticides Control.
Specialist	Has a degree from the University of New Hampshire (1979). He is an SAF Certified Forester [®] and Certified Sustainable Forest Management Auditor [®] and a RAB/QSA certified EMS Lead Auditor. He has 25 years of experience in forestry, forest policy and land conservation.
Local Specialist	Has a degree from Auburn University (1975), Auburn, AL, and over 29 years experience in the wildlife and environmental fields. His major areas of technical expertise include 14 years as a professional wildlife biologist for a large forest products company coordinating environmental issue management and outdoor recreation business for over six million acres of industrial forestland. He is experienced in endangered species consulting and Sustainable Forestry Initiative

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	certification. He is a Certified Wildlife Biologist and RAB/QSA certified EMS Lead Auditor.
Local Specialist	Has a degree from the University of Florida (1980) Gainesville, FL, and over 26 year's extensive consulting experience. His major areas of technical expertise include forest economics, forest management, acquisition and disposition of real estate, wetlands restoration, and recreation management of rural lands. He is a RAB/QSA certified EMS Lead Auditor.
Specialist	Has degrees from Villanova University (1971) and Pennsylvania State University (1979, 1984, 1992). He is a specialist in the social dimensions of natural resource management and has extensive experience audit to FSC standards and protocols across the United States.
Local Specialist	Has a degree from Unity College (1976) and over 30 years of experience with the USDA-FS in various roles across the United States. He is a USFS certified Silviculturist and experienced NEPA writer with over 60 NEPA documents completed.
Local Specialist	Has degrees from Stephan A. Austin (1987) and Clemson (1989) Universities and 20 years of experience in forestry and wildlife management in the Southeastern US. He is a Certified Forester, Certified Wildlife Biologist, and a RAB/QSA certified EMS Lead Auditor.
Peer Reviewers	Notes
Peer Reviewer 1	Has degrees from the University of Wisconsin (1985) and University of Minnesota (1993) and 20 years experience in forestry internationally and nationally and currently works as a consultant on forest certification issues and forestry. His major areas of expertise are on FSC standards and policies. He has coordinated FSC-US regional and national standard setting processes, served on FSC-IC technical committees and has led audits for FSC certifying bodies.
Peer Reviewer 2	Has degrees from Universidad Politécnica de Madrid, Spain (1997) and University of Maine (2002). With more than nine years of experience in forest policy and management, her current work focuses on supporting and enhancing decision making processes for the management and conservation of forests nationally and internationally. Currently, she is the principal for a natural resources consulting firm and works in academia.
Peer Reviewer 3	Has a degree from the University of Maine (1975) and 31 years experience of professional experience in forestry., and has been a Maine Licensed Forester since 1977. His major areas of technical expertise are in silviculture and forest management, and include 13 years as Chief of Silviculture for a public agency managing over 500,000 acres of multiple use forest lands. Participated as West Region Manager as these lands underwent the first ever simultaneous dual certification (FSC, SFI) in 2001, and has been

7.3 Checklist Preparation

A checklist was prepared that consisted of the documents listed below. This checklist was prepared using the FSC-endorsed national or regional standard.

Standard Used in Evaluation	Effective Date	Version Nr	Changes to Standard
FSC Accredited National Standard for Southeastern United states	2/10/05	10.0	n/a
FSC US Standards for US Dept. of Defence and US Dept. of Energy Forests	2/3/04	1.1	n/a

7.4 Stakeholder notification

A wide range of stakeholders were contacted before during the planned evaluation to inform them of the evaluation and ask for their views on relevant forest management issues, These included environmental interest groups, local government agencies and forestry authorities, forest user groups,

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and workers' unions. The full list of stakeholders that were contacted is available from SGS. Responses received and comments from interviews are recorded under paragraph 14 of this Public Summary.

8. THE EVALUATION

The Main Evaluation was conducted in the steps outlined below.

8.1 Opening meeting

An opening meeting was held at the NFF Supervisors office in Tallahassee, FL. The scope of the evaluation was explained and schedules were determined. Record was kept of all persons that attended this meeting.

8.2 Document review

A review of the main forest management documentation was conducted to evaluate the adequacy of coverage of the QUALIFOR Programme requirements. This involved examination of policies, management plans, systems, procedures, instructions and controls.

8.3 Sampling and Evaluation Approach

A detailed record of the following is available in section B of the evaluation report. This section does not form part of the public summary, but includes information on:

- Sampling methodology and rationale;
- FMUs included in the sample;
- □ Sites visited during the field evaluation; and
- Man-day allocation.

The field audit was conducted by a team of 6 auditors and technical experts of the course of 5 days from February 12-16. Following an opening meeting at the NFF Supervisor's office in Tallahassee, 2-3 audit teams spent approximately 4 ½ days in the field visiting sites, interviewing staff and stakeholders and reviewing records. 2 days were spent on the Appalachicola NF, one day on the Osceola NF, and 1 ½ days on the Ocala NF. A closing meeting was held on February 16 at the Seminole Ranger district office in Umatilla, FL.

During the field audit, 61 scheduled sites were visited along with approximately 8 additional unscheduled stops. Field visits included a full variety of NFF management activities including active, scheduled and completed timber harvests (all timber operations, active during the audit, were visited); prescribed burning; Invasive plant control; planting; site preparation; recreational and interpretive sites; natural and artificial regeneration; OHV use areas (authorized and closed); and wildlife management areas. The entire geographic scope of the three national forests was covered.

8.4 Field assessments

Field assessments aimed to determine how closely activities in the field complied with documented management systems and QUALIFOR Programme requirements. Interviews with staff, operators and contractors were conducted to determine their familiarity with and their application of policies, procedures and practices that are relevant to their activities. A carefully selected sample of sites was visited to evaluate whether practices met the required performance levels.

8.5 Stakeholder interviews

Meetings or telephone interviews were held with stakeholders as determined by the responses to notification letters and SGS discretion as to key stakeholders that should be interviewed. These aimed to:

clarify any issues raised and the company's responses to them;

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- obtain additional information where necessary; and
- obtain the views of key stakeholders that did not respond to the written invitation sent out before the evaluation.

Nr of Stakeholders	Nr of Interviews with		
contacted	NGOs	Government	Other
MAIN EVALUATION			
111	22	41	48

Responses received and comments from interviews are recorded under paragraph 14 of this Public Summary.

8.6 Summing up and closing meeting

At the conclusion of the field evaluation, findings were presented to company management at a closing meeting. Any areas of non-conformance with the QUALIFOR Programme were raised as one of two types of Corrective Action Request (CAR):

- Major CARs which must be addressed and re-assessed before certification can proceed
- Minor CARs which do not preclude certification, but must be addressed within an agreed time frame, and will be checked at the first surveillance visit

A record was kept of persons that attended this meeting.

9. EVALUATION RESULTS

Detailed evaluation findings are included in Section B of the evaluation report. This does not form part of the public summary. For each QUALIFOR requirement, these show the related findings, and any observations or corrective actions raised. The main issues are discussed below.

9.1 Findings related to the general QUALIFOR Programme

PRINCIPLE	1: Compliance with law and FSC Principles
Criterion 1.1	Respect for national and local laws and administrative requirements
Strengths	Laws and regulations are exceptionally, fully codified in USDA Forest Service Manuals (FSMs) and Forest Service Handbooks (FSHs), together known as the "Forest Service Directives Systems."
Weaknesses	Shortfalls in implementation of key objectives of the management plan may be inhibiting compliance with the recovery plan for Red Cockaded Woodpecker, as required by the Endangered Species Act (see CAR 03).
Compliance	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate.
Criterion 1.2	Payment of legally prescribed fees, royalties, taxes and other charges
Strengths	The USDA FS is a public, tax-exempt organization; however, it is required to make payments to local communities under Public Law 97-258 (Payments in Lieu of Taxes (PILT)) to offset the reduction in local property tax receipts due to non-taxable federal lands in the local jurisdiction.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate.

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Criterion 1.3	Respect for provisions of international agreements	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	Very few NFF staff were familiar with international agreements such as CITES or the	
Weakilesses	Convention on Biological Diversity (CBO)	
Compliance	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate.	
Criterion 1.4	riterion 1.4 Conflicts between laws and regulations, and the FSC P&C	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	There were no weaknesses associated with this Criterion.	
Compliance	There are no known conflicts between the laws and regulations directing NFF operations and the FSC Principles and Criterion.	
Criterion 1.5	Protection of forests from illegal activities	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	On some sites, lines were not maintained, and not marked (see CAR 01).	
Compliance	The NFF uses gates on clay pits for reasons of safety and to prevent the spread of invasive plants which tend to invade disturbed areas. In addition, they meet their stated target for boundary line establishment at 40 miles per year. There is no compliance associated with this Criterion.	
Criterion 1.6	Demonstration of a long-term commitment to the FSC P&C	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	Since the NFF are not certified and are not seeking certification, there is no demonstrated long-term commitment to the FSC P&C stated in any of there documentation (see Major CAR M02).	
Compliance	This Criterion is not addressed by NFF.	
PRINCIPLE	2: Tenure and use rights and responsibilities	
Criterion 2.1	Demonstration of land tenure and forest use rights	
Strengths	The NFF have thorough documentation on their legal and customary rights associated with the forest.	
Weaknesses	There were no weaknesses associated with this Criterion.	
Compliance	Compliance is achieved both from laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate and from documentation, security, and accessibility of information on the legal (e.g., deeds) and customary rights associated with the NFF, provided by forest personnel and demonstrated to SGS.	
Criterion 2.2	Criterion 2.2 Local communities' legal or customary tenure or use rights	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	There were no weaknesses associated with this Criterion.	
Compliance	Most activities on the NFF are consistent with conservation of the forest and other natural resources and the RLRMP objectives. Activities include sightseeing, hunting, fishing, hiking, biking, horseback riding, and camping. While OHV use has occurred in the past, new USDA FS rules mandate that they occur only on designated routes and areas. Also, through public stakeholder input mandated in the NEPA process there are multiple opportunities for stakeholders and other interested parties to provide input on proposed NFF management activities and their impacts on use.	
Criterion 2.3	Disputes over tenure claims and use rights	
Strengths	Appropriate mechanisms are employed to resolve disputes over tenure claims and use rights. The NFF has engaged in a number of innovative processes to solve prevent or resolve	

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	problems in this area of concern.	
Weaknesses	There were no weaknesses associated with this Criterion.	
Compliance	Prevention of resource degradation and crime, law enforcement procedures, and circumvention of the development of larger issues of concern related to use are facilitated by following federal laws (e.g., NEPA, NHPA, ARPA), utilizing contacts with stakeholders (e.g., through NVUM, tribal correspondence, and FWFCC contacts), and through special efforts to develop an Action Plan to seek solutions (e.g., "Reshaping of the Ocala National Forest" workshop).	
PRINCIPLE	3: Indigenous peoples' rights	
Criterion 3.1	Indigenous peoples' control of forest management	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	There were no weaknesses associated with this Criterion.	
Compliance	Since Tribal lands are not geographically in the vicinity of the NFF, the NFF staff consults with them on principle and because in any case it is the law. From a legal perspective, the NFF does not undertake any forest management planning on Tribal lands.	
Criterion 3.2	Maintenance of indigenous peoples' resources or tenure rights	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	There have been indications, according to representatives of two Tribes, that consultation prior to archaeological survey work and forest management activities is improving, but often lacking. Tribes consulted viewed this as personnel dependent and that institutionally there are no stringent safeguards (see CAR 08).	
Compliance	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate. However, consultations need improvement.	
Criterion 3.3	Protection of sites of special cultural, ecological, economic or religious significance to indigenous peoples	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	Tribal contacts expressed that certain areas on the NFF should be left alone, or that they are unnecessarily disturbed through NFF activities. They feel that developed recreational amenities do not belong in some areas. Another issue related to the lack security the NFF affords sites of significance. Tribes feel that if they themselves do not perform oversight, then it does not get done (see CAR 08).	
Compliance	Compliance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate. However, site disturbances, whether by the NFF or those occurring due to lack security need improvement.	
Criterion 3.4	Compensation of indigenous peoples for the application of their traditional knowledge	
Strengths	There were no strengths associated with this Criterion.	
Weaknesses	There were no strengths associated with this Criterion.	
Compliance	Compliance relative to disclosures and sites of significance is achieved largely due to laws and regulations that are a part of the mandate under which federal agencies such as the USDA FS must operate. Legislation which ensures confidentially are the ARPA of 1979, NHPA of 1966 as amended through 1992, and the Forest Service Tribal Relations Enhancement Act. The NFF can exempt certain information under Exemption 3 of FOIA, such as specific site locations. Also, the same is true under the Florida "Sunshine Law," [s.119.07 (1) and 2.24(a) of Article I of the State Constitution]. No compensation to Tribes or commercialization of Tribal resources occurs on the NFF.	

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PRINCIPLE 4: Community relations and workers rights	
Criterion 4.1	Employment, training, and other services for local communities
Strengths	Diverse activities engaged in by the USDA FS and NFF staff (e.g., timber sales administration, recreation management, wildlife management, archaeology) and contractors (e.g., timber harvesting, boundary line work, recreation concessionaire operations, habitat restoration) leads to above the norm quality and challenging work opportunities.
Weaknesses	NFF systems do not specifically address skill levels for contracted workers. NFF systems do not specifically address training needs and requirements for contracted workers which imply that contractor education skills and training needs may not be sufficient to their roles and responsibilities. While interviews with available contractor personnel indicated appropriate competency training, the NFF system lacks a mechanism for evaluating or ensuring contractor training and education. NFF systems do not specifically address training needs and requirements for contracted workers (see Major CAR M04)
Compliance	NFF employees are engaged in quality work experiences, are well compensated, and given ample opportunities for training and other services. Contractor training is not adequately evaluated and monitored.
Criterion 4.2	Compliance with health and safety regulations
Strengths	OSHA requirements ensure that legislative mandates are in place to ensure that all applicable laws and/or regulations covering health and safety of employees and contractors are followed. NFF health and safety programs include a Health and Safety Handbook, a full-time NFF Safety Officer, and district-level designated safety officers and committees. Specific safety related training programs, monitoring, information sharing, and documentation by NFF staff, in particular the Safety Officer, is exceptional.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	The Occupational Safety and Health Act of 1970, Executive Order 12196 and 29 CFR (Code of Federal Register) 1960 are the major laws and regulations requiring the USDA FS to furnish its employees and contractors with places and conditions of employment that are free from work-related safety and health concerns.
Criterion 4.3	Workers' rights to organise and negotiate with employers
	Workers Tights to organise and negotiate with employers
Strengths	There were no strengths associated with this Criterion.
Strengths	There were no strengths associated with this Criterion.
Strengths Weaknesses	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Employees have access to a union which is called the National Federation of Federal Employees. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests. Documentation was also provided to SGS covering two types of
Strengths Weaknesses Compliance	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Employees have access to a union which is called the National Federation of Federal Employees. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests. Documentation was also provided to SGS covering two types of grievance procedures available to employees that are backed by law.
Strengths Weaknesses Compliance Criterion 4.4	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Employees have access to a union which is called the National Federation of Federal Employees. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests. Documentation was also provided to SGS covering two types of grievance procedures available to employees that are backed by law. Social impact evaluations and consultation NFF contribute to and work with many groups and organizations to protect and utilize appropriately forest and natural resources. The nature of these partnerships is delineated in the RLRMP. A prime example is the relationship with the Florida Park Service and the Florida Trail Association. Extensive assessment of sites having special cultural significance is documented in the EIS, RLRMP, and other supporting records. The existing EIS process includes extensive and well-documented consultation procedures. The NFF informs adjacent landowners and other affected parties of impending forest activities which might affect them in a variety of ways. The NEPA process and the mandates for public inputs provide an avenue
Strengths Weaknesses Compliance Criterion 4.4 Strengths	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Employees have access to a union which is called the National Federation of Federal Employees. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests. Documentation was also provided to SGS covering two types of grievance procedures available to employees that are backed by law. Social impact evaluations and consultation NFF contribute to and work with many groups and organizations to protect and utilize appropriately forest and natural resources. The nature of these partnerships is delineated in the RLRMP. A prime example is the relationship with the Florida Park Service and the Florida Trail Association. Extensive assessment of sites having special cultural significance is documented in the EIS, RLRMP, and other supporting records. The existing EIS process includes extensive and well-documented consultation procedures. The NFF informs adjacent landowners and other affected parties of impending forest activities which might affect them in a variety of ways. The NEPA process and the mandates for public inputs provide an avenue for review of forest projects before any action is taken.
Strengths Weaknesses Compliance Criterion 4.4 Strengths Weaknesses	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Employees have access to a union which is called the National Federation of Federal Employees. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests. Documentation was also provided to SGS covering two types of grievance procedures available to employees that are backed by law. Social impact evaluations and consultation NFF contribute to and work with many groups and organizations to protect and utilize appropriately forest and natural resources. The nature of these partnerships is delineated in the RLRMP. A prime example is the relationship with the Florida Park Service and the Florida Trail Association. Extensive assessment of sites having special cultural significance is documented in the EIS, RLRMP, and other supporting records. The existing EIS process includes extensive and well-documented consultation procedures. The NFF informs adjacent landowners and other affected parties of impending forest activities which might affect them in a variety of ways. The NEPA process and the mandates for public inputs provide an avenue for review of forest projects before any action is taken. There were no weaknesses associated with this Criterion. NFF management planning and operations incorporate social impact evaluations in their projects and activities. Consultations are maintained with groups and agencies
Strengths Weaknesses Compliance Criterion 4.4 Strengths Weaknesses Compliance	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Employees have access to a union which is called the National Federation of Federal Employees. If employees are eligible to be in the union, but decide not to join, the union will still represent their interests. Documentation was also provided to SGS covering two types of grievance procedures available to employees that are backed by law. Social impact evaluations and consultation NFF contribute to and work with many groups and organizations to protect and utilize appropriately forest and natural resources. The nature of these partnerships is delineated in the RLRMP. A prime example is the relationship with the Florida Park Service and the Florida Trail Association. Extensive assessment of sites having special cultural significance is documented in the EIS, RLRMP, and other supporting records. The existing EIS process includes extensive and well-documented consultation procedures. The NFF informs adjacent landowners and other affected parties of impending forest activities which might affect them in a variety of ways. The NEPA process and the mandates for public inputs provide an avenue for review of forest projects before any action is taken. There were no weaknesses associated with this Criterion. NFF management planning and operations incorporate social impact evaluations in their projects and activities. Consultations are maintained with groups and agencies directly affected by management operations.

Compliance	Appropriate mechanisms, both informal (e.g., personal contact) and formal (e.g., letters), are used for resolving grievances by employees and others and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources or livelihoods of local citizens. Measures are taken to avoid such loss or damage. However, preventative and compensative actions by the staff are guided by laws and regulations.
PRINCIPLE	5: Benefits from the forest
Criterion 5.1	Economic viability taking full environmental, social, and operational costs into account
Strengths	The financial and institutional backing of the US Federal government lends significant security to the sustainability of management planning.
Weaknesses	Evidence indicates that the organization has significant and persistent administrative and management constraints that inhibit its ability to achieve key objectives in its management plan. In particular, the demonstrated inability to meet timber harvest objectives – particularly on the ANF and OscNF – is delaying progress toward management plan and recovery plan goals for endangered species recovery.
Compliance	While sustainable infrastructure is clearly provided for the organization, key management plan objectives are being consistently un-met, leading to serious shortfalls in meeting objectives (see Major CAR M05).
Criterion 5.2	Optimal use and local processing of forest products
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Appropriate utilization and marketing standards were observed for production of both timber and non-timber resources. Harvest levels are relatively low.
Criterion 5.3	Waste minimisation and avoidance of damage to forest resources
Criterion 5.3 Strengths	Waste minimisation and avoidance of damage to forest resources There were no strengths associated with this Criterion.
	-
Strengths	There were no strengths associated with this Criterion.
Strengths Weaknesses	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards
Strengths Weaknesses Compliance	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting.
Strengths Weaknesses Compliance Criterion 5.4	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy
Strengths Weaknesses Compliance Criterion 5.4 Strengths	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy There were no strengths associated with this Criterion.
Strengths Weaknesses Compliance Criterion 5.4 Strengths Weaknesses	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. The NFF is clearly a significant and positive contributor to its local communities and economies. A diverse and ambitious strategy for long-term production of a wide variety of
Strengths Weaknesses Compliance Criterion 5.4 Strengths Weaknesses Compliance	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. The NFF is clearly a significant and positive contributor to its local communities and economies. A diverse and ambitious strategy for long-term production of a wide variety of products, services and values is outlines in its management plans.
Strengths Weaknesses Compliance Criterion 5.4 Strengths Weaknesses Compliance Criterion 5.5	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. The NFF is clearly a significant and positive contributor to its local communities and economies. A diverse and ambitious strategy for long-term production of a wide variety of products, services and values is outlines in its management plans. Maintenance of the value of forest services and resources
Strengths Weaknesses Compliance Criterion 5.4 Strengths Weaknesses Compliance Criterion 5.5 Strengths	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. The NFF is clearly a significant and positive contributor to its local communities and economies. A diverse and ambitious strategy for long-term production of a wide variety of products, services and values is outlines in its management plans. Maintenance of the value of forest services and resources There were no strengths associated with this Criterion.
Strengths Weaknesses Compliance Criterion 5.4 Strengths Weaknesses Compliance Criterion 5.5 Strengths Weaknesses	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. The NFF is clearly a significant and positive contributor to its local communities and economies. A diverse and ambitious strategy for long-term production of a wide variety of products, services and values is outlines in its management plans. Maintenance of the value of forest services and resources There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion.
Strengths Weaknesses Compliance Criterion 5.4 Strengths Weaknesses Compliance Criterion 5.5 Strengths Weaknesses Compliance	There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. The NFF is clearly a significant and positive contributor to its local communities and economies. A diverse and ambitious strategy for long-term production of a wide variety of products, services and values is outlines in its management plans. Maintenance of the value of forest services and resources There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Conformance to this criterion is recorded in criterion 6.5
Strengths Weaknesses Compliance Criterion 5.4 Strengths Weaknesses Compliance Criterion 5.5 Strengths Weaknesses Compliance Criterion 5.6	There were no strengths associated with this Criterion. Appropriate quality control systems were observed on all active and recent harvest sites. Minimal waste was observed, and appropriate standards are in place to ensure high standards in harvesting. Forest management and the local economy There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. The NFF is clearly a significant and positive contributor to its local communities and economies. A diverse and ambitious strategy for long-term production of a wide variety of products, services and values is outlines in its management plans. Maintenance of the value of forest services and resources There were no strengths associated with this Criterion. There were no weaknesses associated with this Criterion. Conformance to this criterion is recorded in criterion 6.5 Harvest levels

based on supportable analysis and conclusions. Actual cut levels are significantly below plan. PRINCIPLE 6: **Environmental impact** Criterion 6.1 **Environmental impacts evaluation** Strengths The environmental analysis documented in the RLRMP is unusual and notable in both depth and comprehensiveness. Weaknesses There were no weaknesses associated with this Criterion. Compliance The detailed analysis found in the RLRMP, section 2 – Forest-wide Desired Future Conditions, Goals and Objectives appropriately considers the wide range of natural resource values affected and potential environmental impacts of NFF land management. Criterion 6.2 Protection of rare, threatened and endangered species Strengths Specific protection strategies for RTE species and their associated communities occupy an unusual prominence in the key management systems of the NFF. Weaknesses There were no weaknesses associated with this Criterion. Compliance The audit team found a rich variety of specific management strategies designed to conserve and protect RTE species found on the forest. These included management activities at a variety of scales. Appropriate and detailed planning was fully implemented and consistently monitored for effectiveness. Criterion 6.3 Maintenance of ecological functions and values Strengths Key large scale management strategies for large Management Areas on the NFF are designed specifically to achieve restoration goals. Weaknesses There were no weaknesses associated with this Criterion. Compliance Major restoration and conservation goals are central to the ongoing activities on the NFF. Examples include the ambitious use of prescribed fire, replacement of "off-site" slash pine, and sand pine/scrub restoration. Criterion 6.4 Protection of representative samples of existing ecosystems Strengths There were no strengths associated with this Criterion. Weaknesses There were no weaknesses associated with this Criterion. Compliance The RLRMP, Section 2 Forestwide Desired Future Conditions, Goals and Objectives clearly delineate a strategy to identify and manage/protect examples of existing ecosystems and communities. Examples of active programs include scrub habitat and wet savannahs. Criterion 6.5 Protection against damage to soils, residual forest and water resources during operations Strengths There were no strengths associated with this Criterion. Weaknesses There were no weaknesses associated with this Criterion. Compliance The NFF has documented systems, fully implemented, to address protection of soils, forests, and water resources during operations. The RLRMP specifically cites the Florida Silviculture Best Management Practices (BMPs) as operating criteria. Compatible criteria are implemented on harvest operations through contract provisions. One instance was noted where harvest standards for sand pine on the required a variance from the standard guidance of the FL BMPs. Criterion 6.6 Chemical pest management Strengths There were no strengths associated with this Criterion. Weaknesses There were no weaknesses associated with this Criterion. Compliance The NFF has appropriate written procedures for the utilization of pest control chemical. Chemical use, in practice, is quite moderate in scope and largely focused on habitat restoration objectives and control of exotic plants. Use of two materials, currently under review for

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	derogation, may create future conformance conflicts (see CAR 06).
Criterion 6.7	Use and disposal of chemicals, containers, liquid and solid non-organic wastes
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Written procedures for use and disposal of chemicals, containers and wastes are adequate. No examples of spill response were available for review.
Criterion 6.8	Use of biological control agents and genetically modified organisms
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Not applicable
Criterion 6.9	The use of exotic species
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Not applicable
Criterion 6.10	Forest conversion to plantations or non-forest land uses
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Not applicable
PRINCIPLE	7: Management plan
Criterion 7.1	Management plan requirements
Strengths	The extent and detail of the NFF management plan documentation is unusual.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	The "Revised Land and Resource Management Plan for National Forests in Florida" (RLRMP)dated February 1999, as amended serves as the principal management planning document. This set of documents is publicly available at http://www.fs.fed.us/r8/florida/projects/ .
Criterion 7.2	Management plan revision
Strengths	There were no strengths associated with this Criterion.
Weaknesses	The system has not addressed significant shortfalls in key management plan objectives over
	more than one-half of the plan (see CAR 07).
Compliance	
	more than one-half of the plan (see CAR 07). An active system of adaptation and amendment of the RLRMP was demonstrated. Cycle includes Management review, Environmental Assessment (EA) and Plan Ammendment.
Compliance	more than one-half of the plan (see CAR 07). An active system of adaptation and amendment of the RLRMP was demonstrated. Cycle includes Management review, Enviornmental Assessment (EA) and Plan Ammendment. Seven Plan amendments are on record.
Compliance Criterion 7.3	more than one-half of the plan (see CAR 07). An active system of adaptation and amendment of the RLRMP was demonstrated. Cycle includes Management review, Enviornmental Assessment (EA) and Plan Ammendment. Seven Plan amendments are on record. Training and supervision of forest workers
Compliance Criterion 7.3 Strengths	more than one-half of the plan (see CAR 07). An active system of adaptation and amendment of the RLRMP was demonstrated. Cycle includes Management review, Enviornmental Assessment (EA) and Plan Ammendment. Seven Plan amendments are on record. Training and supervision of forest workers There were no strengths associated with this Criterion.
Criterion 7.3 Strengths Weaknesses	more than one-half of the plan (see CAR 07). An active system of adaptation and amendment of the RLRMP was demonstrated. Cycle includes Management review, Enviornmental Assessment (EA) and Plan Ammendment. Seven Plan amendments are on record. Training and supervision of forest workers There were no strengths associated with this Criterion. System for training and ensuring competency do not address contracted workers. Evidence indicates fully adequate training of NFF staff in the procedures and associated

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Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	All management plan documents are publicly available. This set of documents is available at http://www.fs.fed.us/r8/florida/projects/ .
PRINCIPLE	8: Monitoring and evaluation
Criterion 8.1	Frequency, intensity and consistency of monitoring
Strengths	Monitoring and reporting procedures, utilized routinely by the NFF as part of USDA-FS regulated programs, constitute an unusually broad and detailed level of information, utilized both internally for decision-making and externally for stakeholder consultation.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	The NFF has a fully-developed and detailed set of monitoring and reporting procedures that fully meet the intent of this standard.
Criterion 8.2	Research and data collection for monitoring
Strengths	The quality and detail of monitoring data is unusual for forest management organizations.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	All required items are fully addressed.
Criterion 8.3	Chain of custody
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Not applicable
Criterion 8.4	Incorporation of monitoring results into the management plan
Strengths	There were no strengths associated with this Criterion.
Weaknesses	The mechanisms in place to revise the management plan have not addressed the organization's inability to achieve key objectives in its management plan. See CAR 07.
Compliance	A mechanism is in place to utilize information from monitoring systems to review and adapt management procedures. Examples were reviewed that demonstrated the process by which monitoring data lead first to management review, then to environmental analysis and finally amendments to the RLRMP.
Criterion 8.5	Publicly available summary of monitoring
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	All monitoring report documents are publicly available. This set of documents is available at http://www.fs.fed.us/r8/florida/projects/ .
PRINCIPLE 9: High Conservation Value Forests	
Criterion 9.1	Evaluation to determine high conservation value attributes
Strengths	The NEPA regulated process of resource evaluation ensures a high standard of evaluation of the attributes of high conservation values.
Weaknesses	A specific evaluation to the FSC criteria for HCVF has not been undertaken.
Compliance	The resource evaluation conducted in the FEIS and implemented through the RLRMP constitutes an equivalent evaluation to that required for this standard. The evaluation presented in the RLRMP Section 2, Forestwide Desired Future Conditions, Goals and Objectives describes high conservation values, including those associated with endangered species, for large portions of the NFF.

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Criterion 9.2	Consultation process
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	This criterion is instruction to FSC-accredited certification bodies.
Criterion 9.3	Measures to maintain and enhance high conservation value attributes
Strengths	Habitat conservation and restoration play a dominant role in NFF management strategies. Maintenance of these high conservation value attributes in embedded in routine standards of practice.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	The NFF organization displays strong conformance in identifying and adapting management to maintaining and restoring HDV's at large (RCW) and small (flatwoods salamander) scales.
Criterion 9.4	Monitoring to assess effectiveness
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	See criteria 8.1 – 8.5
PRINCIPLE	10: Plantations
Criterion 10.1	Statement of objectives in the management plan
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	All use of plantation techniques by the NFF are specifically designed to address restoration and conservation objectives. Notable examples of this include conversion of "off-site" slash pine plantations to longleaf pine; and sand pine/scrub management. These objectives are clearly delineated in the RLRMP.
Criterion 10.2	Plantation design and layout
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	As noted above, NFF planting programs are oriented towards restoration objectives. They also function as a relatively small scale. Design and layout criteria are appropriate in context.
Criterion 10.3	Diversity in composition
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Management criteria for planted stands, as defined by the RLRMP, section 3, are oriented towards encouraging natural forest composition, structure and function. This is evidenced by vegetation management, prescribed fire, and stocking criteria.
Criterion 10.4	Species selection
Strengths	There were no strengths associated with this Criterion.
Weaknesses	There were no weaknesses associated with this Criterion.
Compliance	Planting on the NFF is with longleaf, slash and sand pine. All species are identified as desirable for achieving habitat restoration goals
Criterion 10.5	Restoration of natural forest
Strengths	There were no strengths associated with this Criterion.

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Weaknesses	There were no weaknesses associated with this Criterion.				
Compliance	As noted above, NFF planting programs are oriented towards restoration objectives.				
Criterion 10.6	Impacts on soil and water				
Strengths	There were no strengths associated with this Criterion.				
Weaknesses	There were no weaknesses associated with this Criterion.				
Compliance	No negative impacts to soil and water were noted on or in association with NFF planning operations.				
Criterion 10.7	Pests and diseases				
Strengths	There were no strengths associated with this Criterion.				
Weaknesses	Consistent shortfalls in scheduled harvest treatments raise concerns regarding the requirement to maintain vigor and growth in existing plantations. Backlogs of unthinned slash and longleaf pine plantations could lead to unhealthy conditions over time (see CAR 09).				
Compliance	Active protection of plantations from pests and disease, including effective use of prescribed fire, are conducted according to accepted local norms.				
Criterion 10.8	Criterion 10.8 Monitoring of impacts, species testing and tenure rights				
Strengths	There were no strengths associated with this Criterion.				
Weaknesses	There were no weaknesses associated with this Criterion.				
Compliance	See criteria 8.1 – 8.5				
Criterion 10.9 Plantations established in areas converted from natural forests after November 1994					
Strengths	There were no strengths associated with this Criterion.				
Weaknesses	There were no weaknesses associated with this Criterion.				
Compliance	Not applicable				

10. CERTIFICATION DECISION

Not applicable

11. MAINTENANCE OF CERTIFICATION

Not applicable

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12. RECORD OF CORRECTIVE ACTION REQUESTS (CARS)

CAR#	Indicator			CA	R Detail		
01 minor	1.5.a	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
minoi		Non-Conforma	ance:				
						as boundary ma on the forest.	intenance
						tively unmarked, ntenance standaı	
		Objective Evid	lence:				
		Field Observa	ations				
		Staff Interview	V				
			151- Land Surv 2.6- Standards		1- Authority, 71	52- Land Line Lo	cation
		Close-out evid	lence:				
				1			
M02 major	1.6	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
major		Non-Conforma	ance:				
			requires that f FSC Principal		s demonstrate	a long term com	mitment to
				nade no specif e FSC standar		on or manageme	nt directive
		Objective Evid	lence:				
		Revised Land	and Resource	e Management	Plan for NFF		
		Staff interviev	V				
		Close-out evid	lence:				
				1		1	l
03 minor	1.1.a	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
minoi		Non-Conforma	ance:				
			d requires that and regulation		plans and opera	ations comply with	n federal, state
		(e.g. timber h	arvest acres) a	are inhibiting th	e ability of the	ctives of the man organization to modpecker recover	eet its long-
		Objective Evid	lence:				
		2005 Annual Monitoring and Evaluation Report – NFF					
		Revised Land and Resource Management Plan for NFF					
		Close-out evid	lence:				
M04	4.1.d; 4.1.g	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
major		Non-Conforma	ance:				
	1						

CAR # I	Indicator			CA	R Detail		
		The standard requires that the organization provide and/or support training opportunities for workers, as well as ensure that workers have skills to perform assigned jobs.					
						r NFF employees nities for contracte	
		Objective Evid	lence:				
		Staff Interview	v				
		Close-out evid	lence:				
	5.1.c 5.1.e	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
inajor	0.1.0	Non-Conforma	ance:				
		fulfil manager	nent objectives is an economi	s and maintain	and/or restore	rest management forest health and rimary goals of th	productivity.
		management plan. In partic particularly or	constraints tha cular, the demonstrate the constraint of the constraints of	at inhibit its abil onstrated inabil	lity to achieve lity to meet timl laying progress	nd persistent adm key goals in its ma ber harvest objed s toward managed	anagement ctives –
		Objective Evid	lence:				
		2005 Annual	Monitoring and	l Evaluation Re	port – NFF		
		Staff Interview	vs				
		Field Observa	ations				
		Close-out evid	lence:				
06 6	6.6.f	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
		Non-Conforma	ance:				
		The standard requires compliance with the FSC Policy paper "Chemical Pesticid Certified Forests, Interpretation of the FSC Principals and Criteria".					esticides in
		The NFF makes use of two herbicide products – imazapyr and hexazinone – which a currently listed as prohibited. Derrogation applications are pending for use in the USA					
		Objective Evid	lence:				
		Pesticide app	lication records	S			
		Staff interview	vs				
		Close-out evid	lence:				
						·	
l l	7.2.a; 8.4.b	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a

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CAR#	Indicator			CA	R Detail		
		The standard requires that the management plan shall be periodically reviewed to					
		incorporate the social, and ed	ne results of mo conomic circum cessary to acc	onitoring as we estances. It als	II as responding requires that	g to changing en the managemen ween outcomes a	vironmental, t plan be
		Evidence indicates that the organization has significant and persistent adm management constraints that inhibit its ability to achieve key goals in its maplan. While demonstrated systems are in place to amend the management organization has not addressed the consequences of major shortfalls in its schedules.					anagement It plan, the
		Objective Evid	lence:				
		Revised Land	and Resource	e Management	Plan for NFF		
		2005 Annual	Monitoring Rep	oort			
		Close-out evid	lence:				
08 minor	3.2.a; 3.3.b	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
1111101		Non-Conforma	ance:				
		indigenous gr		g forest operati	ons; additional	act and invite inp ly that forest man	
					ups indicate that consistent and	at while required a leffective.	consultation
		Objective Evid	lence:				
		Stakeholder o	consultation				
		Close-out evidence:					
09 minor	10.7.a	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	n/a
		Non-Conforma	ance:				
The standard requires that plantation vigor be maintained of pests and diseases. The NFF Land and Resource Mana schedule of cultural treatments whose goals include largestocking levels by thinning pine stands and use of prescribe and maintain forest vigor and health.				ce Management e large-scale red	t Plan has a duction of		
		Consistent sustained shortfalls in reaching plan objectives for harvest and other cult treatments creates a significant risk to the organizations ability to maintain healthy a productive forest conditions as required.					
		Objective Evidence:					
		Revised Land and Resource Management Plan for NFF					
		2005 Annual Monitoring and Evaluation Report – NFF					
		Field Observa	ations				
		Staff Interview					
		Close-out evid	lence:				
10	6.5.b	Date Recorded>	16 FEB 07	Due Date>	n/a	Date Closed>	July 2, 2007

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CAR#	Indicator	CAR Detail
minor		Non-Conformance:
		The standard requires a program to meet or exceed state BMPs for timber harvesting operations.
	Standards for harvesting Sand Pine stands on the Ocala NF – in particular, clear cutting to the water's edge on some sites - may not be consistent with FL BMP standards	
		Objective Evidence:
		Revised Land and Resource Management Plan for NFF
		Staff interview
		Florida's Silviculture Best Management Practices (FL DoF 2004)
Close-out evidence:		Close-out evidence:
		Evidence provided during the review of draft reports supports modifying this finding. In particular, page 16 of the FL Silviculture BMPs includes language allowing specific exceptions to BMP for public land managers. Standards for Scrub Habitat, as detailed in the LRMP, are an appropriate implementation of this language.
		This Non Conformity is closed.

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13. RECORD OF OBSERVATIONS

OBS#	Indicator	Observation Detail				
01	1.5.a	Date Recorded>	16 FEB 07	Date Closed>	dd MMM yy	
	Observation: Field observations indicate that some boundaries of the Navy Ordinance Area ONF were not clearly marked. While this internal boundary line may be the re of the Navy, a potential hazard to public safely is indicated.					
		Follow-up evidence:				
		Date Recorded>		Date Closed>		
Observation:						
	Follow-up evidence:					

14. RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS

15. RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS

Nr	Comment	Response
	Ma	in Evaluation
1	NFF staff, in general, were not familiar with international agreements such as CITES or the Convention on Biological Diversity (CBO) (see Observation 2).	Key personnel, such as the Wildlife Biologists, were familiar with these agreements. However, several employees were unaware of these agreements
2	SGS interviewed NFF staff and staff of the Florida Wildlife and Fish Conservation Commission (FWFCC) to define their relationship with the NFF.	This interagency relationship served as an example of outside consultations whereby the FWFCC and the NFF achieve desired wildlife and fish population goals through appropriate habitat management relative to forest management activities.
3	Stakeholder contacts with several tribal representatives have portrayed a less than consistent effort on the part of the NFF in regard utilizing their inputs. Tribal concerns have stated that often they discover that activities have taken place without their being informed or consulted prior to the activity. This has occurred even prior to archaeological survey work. There have been indications, according to the tribes, that this is improving but the tribes view this as personnel dependent and that institutionally there are no stringent safeguards (see CAR 08).	The NFF identify and contact indigenous groups that have current legal and customary rights to use the land base. They stated, and provided documentation, showing that they have invited tribal concerns to provide their inputs on forestry operations and other activities (e.g., developed recreational sites) and have received tribal responses.
4	Some level of dissatisfaction exists amongst the tribes with the amount of protection and development that has occurred in areas of special significance to the tribe, which includes many water resources. In one case, a watercourse was negatively affected that had a burial area under water (See also 3.2.a). In another case, on Silver Glen Springs, the tribes asked for buffers of 350 feet around the area with no grills and restroom facilities, and this was not done. This request came after the tribes restored the area using volunteer help to repair damages from looting and erosion. In addition, the tribes feel that certain areas should be left alone, or that they are unnecessarily disturbed through NFF activities. They feel that developed recreational amenities do not belong in some areas. Another issue related to the security that the NFF affords sites of significance. The tribes feel that if they do not perform oversight, then it does not get done (see CAR 08).	As stated in the LRMP, and related to the SGS by NFF employees, it is the intention of the NFF to consult with tribes during decision-making processes related to forest management. This includes considering the effects of natural resource management decisions on the ability of tribes to exercise certain rights. Site-specific project analyses conducted by NFF address how project proposals may affect the ability of tribes to exercise their rights.
5	NFF has never dealt with traditional knowledge the tribes would like to protect and commercialize. As verified through NFF employee and stakeholder contacts the tribes have no legal claims to any fees.	There is no commercialization on the part of the NFF of indigenous intellectual property, traditional knowledge, and/or forest resources owned by the tribes. As a result, no written agreement exists.
6	Interviews with available contractor personnel indicated appropriate competency training; however, the NFF system lacks a mechanism for evaluating or ensuring contractor training and education (see CAR M04). NFF systems do not specifically address training needs and requirements (see CAR M04) for contracted workers.	Contractor training is not adequately evaluated and monitored.
7	NFF staff periodically meets with contractors before jobs are undertaken and then they confer during and after the job implementation. Interviews with logging contractors stated that the timber sale administrators visited the harvesting site as often as once a day.	All actions with regard to contractors are performed within the constraints of procedures and regulations under which the USDA FS must act. Both USDA FS employees and contractors are encouraged to participate and provide input into decision-making processes. Contractors, who are more locally involved, have access to their NFF technical representative to provide feedback.

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Nr	Comment	Response	
	Main Evaluation		
8	A number of stakeholders replied to the stakeholder survey in regard to ATV use. Comments ranged from totally banning ORV to increasing their use.	NFF are in the process of designating roads and trails for specific uses. This will hopefully alleviate many of the complaints. Law enforcement needs to be enhanced, and this has happened already on the ONF.	

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16. RECORD OF COMPLAINTS

Nr	Detail		
	Complaint:	Date Recorded >	dd MMM yy
	None recorded		
	Objective evidence obtained:		
	Close-out information:	Date Closed >	dd MMM yy
	Complaint:	Date Recorded >	dd MMM yy
	Objective evidence obtained:		
	Close-out information:	Date Closed >	dd MMM yy
	Complaint	Date Recorded >	dd MMM yy
	Objective evidence obtained:		
	Close-out information:	Date Closed >	dd MMM yy

End of Public Summary