

Forest Guild Comments on New American Forest Foundation (AFF) 2015-2020 Standards of Sustainability

Submitted by Membership and Policy Committee (MPC) of the Forest Guild
September 9, 2014

Standard 1: Commitment to Practicing Sustainable Forestry

Current Indicator 1.1.1

“Management plan shall be active, adaptive, and embody the landowner’s current objectives, remain appropriate for the land certified and reflect the current state of knowledge about forestry and natural resource management.”

Suggested change:

“Management plan shall be active, adaptive, and embody the landowner’s current objectives, remain appropriate for the land certified and reflect the current state of knowledge about forest ecosystems and natural resource management.”

Comments: We really like AFF’s adaptive management language. The Forest Guild feels that management should reflect the limitations of knowledge about forest ecosystems and should be flexible enough to allow for credible new information and management approaches.

The Forest Guild cautions the use of “Practicing Sustainable Forestry” or “implementing sustainable practices”. The Forest Guild feels that today’s certification standards should not be considered to be a guarantee of long-term sustainability. Rather, they are a definition of well-managed forests that must evolve over time. The Forest Guild thinks the title would be more appropriate if it were “Commitment to a Well-Managed Forest”.

Indicator 1.1.2

Comments:

AFF mentions biomass as a resource to describe and evaluate as a resource element. The Forest Guild has been very involved in developing biomass retention and harvesting guidelines to protect the soil and water quality and provide suitable wildlife habitat. In the Guidance section the Forest Guild would like to see you reference links to biomass retention and harvesting guidelines. The Forest Guild has developed some very good references on Biomass Retention and Harvesting Guidelines that you may choose as a possible resource for resource professionals developing plans. Here are the links to our Southeast, Northeast, and Pacific Northwest publications:

http://www.forestguild.org/publications/research/2012/FG_Biomass_Guidelines_SE.pdf

http://www.forestguild.org/publications/research/2010/FG_Biomass_Guidelines_NE.pdf

http://www.forestguild.org/publications/research/2013/FG_Biomass_Guidelines_PNW.pdf

These publications may be applicable for other parts of the country.

Standard 3: Reforestation and Afforestation

Comments: The Forest Guild likes AFF's comment about ensuring that potential negative impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and to determine whether negative impacts can be avoided or minimized.

Under the Guidance Section of Standard 3, the Forest Guild also likes that AFF recommends using native species that are well-adapted to the site conditions. Because of the Forest Guild's strong policy of supporting natural ecosystems we would like to see AFF consider adding the following statements in your Guidance Section:

- Landowner must identify actions that promote healthy functioning ecosystems and reforestation should emphasize restoring native forest ecosystems and associated biotic communities, structures, and processes.
- Landowner should maintain forest cover over the long term and limit conversion to non-forest uses.

The Forest Guild knows that it will probably hard to incorporate into the existing Tree Farm Program Standards, but the Forest Guild would also like to see an attempt to limit the conversion of stands with natural characteristics to high-yield production stands. Please see the Forest Guild's Position Statement (2000) on High-Yield Production Forestry for more details. Here is link to that position statement:

http://forestguild.org/publications/policy/Policy_Silviculture.pdf

Standard 4: Air, Water and Soil Protection

Comments: The Forest Guild likes that State Forestry Best Management Practices are required even if voluntary in the state of practice.

The Forest Guild would however like to see stronger language included for soil protection. The Forest Guild's suggestion would be something like "Landowner will manage forest soils to protect their structure, function and productivity."

Standard 5: Fish, Wildlife, Biodiversity and Forest Health

Comments: AFF mentions biodiversity but they don't really address it or provide any indicators of success for conserving biodiversity.

The Forest Guild finds it interesting that you do not even mention climate change or adaptation to climate change in any of the standards. Here is the Forest Guild's suggestion for change for Indicator 5.3.1:

Current Indicator 5.3.1

“Forest owner should make practical efforts to promote forest health, including prevention, control or response to disturbances such as wildland fire, invasive species and other pests, pathogens or unwanted vegetation to achieve specific management.”

Suggested Change:

“Forest owner should make practical efforts to promote forest health, including prevention, control or response to disturbances such as wildland fire, climate change, invasive species and other pests, pathogens or unwanted vegetation to achieve specific management.”

Also under the Guidance section the Forest Guild would like to see AFF change a sentence so it reads:

“Landowners are advised to take a practical, proactive approach to promoting the resilience, productivity, and vitality of their forests especially in light of climate change impacts.”

The Forest Guild likes that AFF is promoting measures to promote the resilience and reduce the susceptibility of their woodlands, but the Forest Guild also thinks it is critical to responding to climate change adaptations.

Standard 8: Forest Product Harvests and Other Activities

Comments: The Forest Guild feels this standard is lacking some matrix or measurable performance indicators.

The Forest Guild supports harvesting rates that are supported by sustained yield calculations commensurate with ownership size and intensity of operations. To demonstrate long-term sustainability a landowner should have to demonstrate how their harvest rates support a sustainable system of multi-aged forests with diverse forest types.

The Forest Guild also thinks AFF needs to emphasize improving the quality of a Tree Farmers forest. The Forest Guild would like to see you add an indicator that requires the maintenance and improvement of timber quality, stocking, and long-term productivity. The forest owner should implement silvicultural practices that promote this type of forest improvements. The forest management plan should also provide recommendations on how this will be accomplished.

Thank you for your consideration.

Submitted by: The Forest Guild – Membership & Policy Committee