

November 17, 2008
Mr. Doug MacCleery
USDA Forest Service (FM)
201 14th St. SW., Mailstop: 1103
Washington, DC 20024

RE: Comments on “Forest Certification and Its Implications for America's National Forests” 73 Fed. Reg. 53820 (September 17, 2008)

Dear Mr. MacCleery:

We appreciate the opportunity to comment on the Forest Service’s consideration of certification of the national forests. Please accept these comments on behalf of the Society of American Foresters (SAF), representing more than 14,000 professional foresters from the academic, government, private, and not-for-profit sectors. SAF, as the voice of professional foresters in the U.S., is in a position to provide useful context and considerations for the Forest Service as it deliberates on this issue.

We applaud the consideration of certification for the national forests and the thoughtful questions and issues that are being raised. While there remain questions to be answered, SAF believes that certification of the national forests would be a positive development and we encourage the agency to pursue certification under both major certification systems.

Certification is an opportunity for third party, independent evaluation of practices against a defined set of criteria, and offers an objective perspective for identifying needed areas for improvement. For example, auditors participating in the Pinchot Institute study about certification on National Forests identified forest health issues arising from backlogged forest management activities as a significant failure of the case study forests relative to their stated goals.

Certification offers an opportunity for continuous improvement in forest practices and for meaningful engagement with the public about the programs, practices and accomplishments of the national forests. It also may actually improve the agency’s standing with the public. The Forest Service espouses sustainable forestry both within the U.S. and in the international arena, and participation in third-party certification would demonstrate a clear commitment to that goal. Third-party certification of forestry practices is becoming an expected business standard throughout the world, especially for large public and private landowners. Major businesses in many sectors want verification that forest products they consume come from well-managed forests.

The Forest Service should consider the experiences of the states that have undergone certification of their forests. Several state agencies that have undertaken forest certification report real management improvement benefits. A Wisconsin DNR certification fact sheet reports, “Within DNR, certification audits have helped the agency focus on its mission and follow through with important initiatives.”

Although SAF supports the pursuit of certification of national forests, we urge the following precautions in its implementation:

1. Given already stretched financial and personnel resources, the agency should carefully consider how to efficiently coordinate this endeavor with existing forest planning and system management exercises and to avoid distraction from needed management activities.
2. The Forest Service should be transparent and realistic with expectations, both within and outside of the agency. Certification will not offer a silver bullet to resolve the long-standing controversies over land management priorities. There are several major management issues that will pose a challenge to successful certification, including the forest health issues arising from backlogged forest management activities.
3. Forest certification should be pursued deliberately and with a clear set of criteria for evaluating the readiness of individual units of the National Forest System to proceed.
4. The Forest Service should prepare contract specifications about the performance of certification auditors; such sideboards would more likely assure quality work.
5. The Forest Service should establish priorities for certification by Region or state, phasing into a broader program so that certification bodies have the proper lead time to prepare for national forest certification audits.

Please consider SAF and its membership a resource as you pursue this opportunity. SAF can play a role in helping to assure the availability of qualified certification auditors. Thank you for considering our comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael T. Goergen". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael Goergen
Executive Vice-President and CEO