



Kathy Abusow
 President and CEO
 Sustainable Forestry Initiative
 2121 K Street, NW, Suite 750
 Washington, DC 20037

June 30, 2020

Ms. Abusow,

On behalf of the nation's state foresters, I would like to take this opportunity to offer proposed recommendations from the National Association of State Foresters (NASF) on the current Sustainable Forestry Initiative (SFI) Standards Revision Process. NASF strongly values our partnership with SFI; our association and its individual members engage with and support SFI programs on many levels.

As you are aware, NASF is composed of the directors of forestry agencies in all 50 states, the U.S. territories, and the District of Columbia. Our members manage and protect state and private forests, which encompass nearly two-thirds of the nation's forests. Their work contributes to the active management of America's forests, which enhances forest health, productivity, and resilience, and supports critical forest markets that fuel local economies across the country. SFI certification is a vital tool for ensuring sustainable forest management while supporting forest markets. Without a doubt, the state forestry agencies, organizations, and companies who hold SFI certification are crucial to keeping forests as forests in the U.S.

There is one area of the SFI standards – specific to the Forest Inventory and Analysis (FIA) program – that we would like to offer revisions to. In the past five years, several forest products companies have declined to participate in the U.S. Forest Service's FIA program. As you know, FIA is the nation's forest census and the most comprehensive national forest inventory system in the world. FIA data is how the forestry community assesses forest health and the spread of non-native insects and diseases, makes economic planning decisions, monitors wildlife habitat, gauges wildfire risk, and assesses rates of land use change; it is a critical tool in documenting sustainability at various scales. State forestry agencies and the Forest Service deliver this program, but it takes full cooperation and participation from all stakeholders in the forestry community to ensure FIA data is as robust and accurate as possible.

Forest products companies and corporate forest landowners use FIA data to make critical investment decisions, but they also have a variety of roles to play in gathering the data. These roles include allowing federal and state measurement crews on company lands to take inventories, responding to FIA Timber Products Output (TPO) mill surveys on roundwood usage, and

Executive Director
 Jay Farrell

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participating in the National Woodland Owners Survey (NWOS) for corporate forest landowners. For a variety of reasons, the industry's participation in FIA data gathering, including from many SFI certified entities, has been decreasing. We humbly submit that it should be required for any entity desiring SFI certification to cooperate with and contribute to national level sustainability tracking research programs, such as FIA.

We have filed our official comments through the SFI online public comment survey system. They are also attached to this letter for your convenience. Our comments, in short, propose a few wording changes and a new indicator under both the Forest Management Standard – Objective 11 and the Fiber Sourcing Standard – Objective 5, both of which deal with Forestry Research, Science and Technology. Our additions highlight the importance for entities holding or seeking SFI certification of cooperation with the Forest Service and state forestry agencies in collecting sustainability data for FIA analysis.

Thank you for your consideration of this issue and your longstanding partnership with NASF and State Foresters. We value the work you do at SFI tremendously!

Sincerely,



Greg Josten
NASF President
South Dakota State Forester

Executive Director
Jay Farrell

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SUSTAINABLE FORESTRY INITIATIVE
SFI-0001

[Questions? Contact Gregor.Macintosh@SFIprogram.org](mailto:Gregor.Macintosh@SFIprogram.org)

Second comment period: May 1 - June 30, 2019

SFI STANDARDS REVISION - SECOND COMMENT PERIOD

Please note the tabs at the bottom of this worksheet. Click on the tab for the SFI Standards Section you wish to enter comments for. Add additional rows to each sheet as needed

Enter your name, organization, e-mail and telephone number on this first sheet in the boxes below and they will auto fill on all remaining sheets

Name: _____ **Organization:** _____ **E-Mail:** rwhitney@stateforesters.org

Robyn Whitney _____ National Association of State Foresters **Telephone:** (202) 624-5977

SFI STANDARD REVISION COMMENT TEMPLATE FOR SFI STANDARDS AND RULES

	SFI 2022 Standards & Rules Section (April XX Version)	Clause (e.g. Indicator 1.a)	Comment	Proposed new language
	<i>e.g. Section 2. SFI Forest Management</i>	<i>specify the exact clause/language you are commenting on</i>	<i>use this box to share your comment</i>	<i>provide proposed new language to address your comment</i>
1	Section 2. SFI Forest Management	Objective 11, Performance Measure 11.2, Indicator 2	We propose a 2nd (new) indicator underneath the performance measure that requires support for sustainability analysis and research. We believe it should be required for any entity desiring SFI certification to cooperate with and contribute to national level sustainability tracking research programs, such as Forest Inventory and Analysis (FIA) in the United States and NFI (National Forest Inventory) in Canada. These multi-stakeholder efforts are the best way to track and tell the story of the importance of sustainable forest management.	Indicator 2. Participation, individually and/or through cooperative efforts involving SFI Implementation Committees and/or state and federal association and/or associations at the national, state, provincial, or regional level in federal forest inventory programs, including but not limited to efforts to: <ul style="list-style-type: none"> a. collect forest inventory data from field plots b. survey mills regarding the use of roundwood, and c. collect data about private landowner demographics and intentions
2	Section 2. SFI Forest Management	Objective 11, Performance Measure 11.2	We believe contributing to multi-party analyses is equally important as developing unique analyses or using them when completed, and that they are important at the national level as well as state and regional levels. This wording additions proposed here are in support of the addition of Indicator 11.2.2 above.	Performance Measure 11.2. Certified Organizations shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners develop, contribute to , or use national , state, provincial or regional analyses in support of their sustainable forestry programs.



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Name: Robyn Whitney **Organization:** National Association of State Foresters **E-Mail:** rwhitney@stateforesters.org
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1 Section 3. SFI Fiber Sourcing	Objective 5, Performance Measure 5.2, Indicator 2	We propose a 2nd (new) indicator underneath the performance measure that requires support for sustainability analysis and research. We believe it should be required for any entity desiring SFI certification to cooperate with and contribute to national level sustainability tracking research programs, such as Forest Inventory and Analysis (FIA) in the United States and NFI (National Forest Inventory) in Canada. These multi-stakeholder efforts are the best way to track and tell the story of the importance of sustainable forest management.	Indicator 2. Participation, individually and/or through cooperative efforts involving SFI Implementation Committees and/or state and federal association and/or associations at the national, state, provincial, or regional level in federal forest inventory programs, including but not limited to efforts to: a. collect forest inventory data from field plots b. survey mills regarding the use of roundwood, and c. collect data about private landowner demographics and intentions
2 Section 3. SFI Fiber Sourcing	Objective 5, Performance Measure 5.2	We believe contributing to multi-party analyses is equally important as developing unique analyses or using them when completed, and that they are important at the national level as well as state and regional levels. This wording additions proposed here are in support of the addition of Indicator 5.2.2 above.	Performance Measure 5.2. Certified Organizations shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners develop, contribute to , or use national , state, provincial or regional analyses in support of their sustainable forestry programs.