



March 24, 2023

Pennsylvania SFI Implementation Committee
211 Barrington Ln
Bellefonte, PA 16823

The Sustainable Forest Initiative (SFI) Fiber Sourcing Standard Performance Measure 1.2 “Promotion and conservation of forests with exceptional value” requires SFI-Certified Organizations to conduct an assessment “of forests with exceptional conservation value, defined as critically imperiled and imperiled species and ecological communities, within their wood and fiber supply area(s) and make the summary available to wood producers”.

The Pennsylvania Natural Heritage Program (PNHP) gathers and provides information on the location and status of these important ecological resources in Pennsylvania. The PNHP is a partnership between the Pennsylvania Department of Conservation and Natural Resources (DCNR), the Pennsylvania Fish and Boat Commission (PFBC), the Pennsylvania Game Commission (PGC), and the Western Pennsylvania Conservancy (WPC) in cooperation with the U.S. Fish and Wildlife Service (USFWS). Each PNHP partner agency is responsible for managing specific taxonomic groups of rare, threatened, and endangered species, as well as species of concern and rare natural features. At the federal level, the USFWS is responsible for the administration of the Endangered Species Act for federally listed Threatened and Endangered Species. At the state level, species protection is divided among the three state agencies (DCNR, PFBC, and PGC), also called jurisdictional agencies. DCNR is responsible for wild plants; PFBC is responsible for fish, amphibians, and reptiles; and PGC is responsible for birds and mammals.

The previously stated SFI requirement is problematic in Pennsylvania as critically imperiled (G1) and Imperiled (G2) species are often vulnerable to illegal collection, harassment and/or habitat damage due to excessive visitation. The provision of geographic occurrence data for these species is typically restricted, and the release of this data to the public is generally not allowed for the protection of the resource. For these reasons, the PNHP and partner agencies are unable to provide publicly accessible geographic occurrence data specific to G1 and G2 species in Pennsylvania for the purposes of wood producers, qualified logging professionals, forest landowners, and other stakeholders to assess forests with exceptional conservation value within the fiber supply area(s) of SFI-Certified Organizations operating in Pennsylvania.

The PNHP and partner agencies do allow the public to screen projects for potential impacts to species of concern (including G1 and G2 ranked species, as defined by NatureServe) through the PA Conservation Explorer environmental review tool (<https://conservationexplorer.dcnr.pa.gov/>). The environmental review process includes specific screening for timber harvesting and vegetation management projects and produces a Pennsylvania Natural Diversity Inventory (PNDI) receipt with conservation or enhancement measures, avoidance measures or next steps for further review. While there is a \$40 charge for screening the project and generating a PNDI receipt, the resulting receipt will provide documentation of any potential conflicts with a known location of a species of concern and identifies

the respective jurisdictional agency (or agencies). We believe this is a more comprehensive assessment of potential biodiversity impacts and this can be done by either the SFI-Certified Organization or the wood/fiber source (e.g., forest landowner or wood producer).

We appreciate your interest in conserving Pennsylvania's natural heritage and commend the good intentions of the 2022 SFI Standards that promote and conserve Pennsylvania's forests with exceptional conservation value.

Sincerely,

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