



Keeping Northwest California wild since 1977

September 30, 2011

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RE: Comments on draft Guidance to the FSC-US Forest Management Standard:  
Indicator 6.3.g.1.b (applicable only to Pacific Coast) — Even-Aged Management

Dear Mr. Dodge,

I am writing on behalf of the Environmental Protection Information Center (EPIC) and Oregon Wild. EPIC is a nonprofit organization that works to protect and restore ancient forests, watersheds, coastal estuaries, and native species in northwestern California. Oregon Wild was founded in 1974 and works to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy for all Oregonians. We appreciate the opportunity to comment on the draft guidance.

The Forest Stewardship Council (FSC) has been a leader in assisting in the development of sustainable forest practices and we hope that FSC continues this tradition. Unfortunately, the draft guidance for even-aged management on the Pacific Coast threatens to undermine the credibility of FSC certification. EPIC has major concerns with FSC certifying even-aged management (commonly referred to as "clearcutting") in the Pacific Coast states of California, Oregon and Washington. As described below, EPIC would prefer that FSC move away from allowing even-aged management in the Pacific Coast states for several reasons. Furthermore, we urge FSC to reevaluate the use of even-aged management in all forest types.

EPIC has a long history of monitoring and challenging private companies and government agencies over their damaging logging practices. Therefore, we are extremely disappointed that FSC currently allows even-aged management at all, and is considering

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expanding certification to include more clearcutting. In doing so, FSC is jeopardizing its hard earned reputation as a leader in promoting sustainable forestry techniques.

### **Clearcut Logging: Forest Stewardship Council vs. Sustainable Forestry Initiative**

The Sustainable Forestry Initiative (SFI) is a timber industry funded marketing campaign that capitalizes on the popularity of “certified” lumber and wood products, largely as a response to FSC certified forest products. Logging companies that are SFI certified rely almost entirely on clearcut logging practices. In California, these companies include Sierra Pacific Industries and Green Diamond Resource Company (formerly called Simpson Timber Company).

As an initial matter, FSC has the ability, and in our view, the obligation, to establish a bright line test to separate FSC standards from the timber-industry’s SFI standards. By not allowing for any even-aged management, FSC can make it clear to the public and to the timber industry that clearcutting is not sustainable. This principled approach would ensure that the FSC’s label remains credible to the public and the environmental community.

The ambiguous language in this Draft Guidance indicates that FSC is prepared to lower its standards to facilitate the certification of logging companies that prefer clearcutting forests. Instead of helping operators improve their practices to attain certification, it appears that FSC is willing to weaken its standards to appease logging companies that intensively clearcut forests. We advise FSC that such changes in standards could be disastrous for the FSC brand. At this point in time there are many consumers that are willing to pay a premium for FSC certified products. If it becomes common knowledge that FSC certifies clearcuts, FSC runs the risk of its brand becoming indistinguishable from SFI certification.

EPIC is a grassroots environmental watchdog with more than 30 years of experience striving to bring accountability to a forest products industry that has abused the landscape as well as the legal framework intended to regulate their activities. From early on we welcomed the advent of the FSC because of the original authentic vision to promote alternatives to destructive practices such as clearcutting. We also recognized immediately the persuasive power in bringing market forces to bear on the companies that employ destructive logging practices.

In our region, the legacy impacts of past clearcutting continue to plague our watersheds, even in forestlands where operators no longer employ clearcutting. For instance, every winter thousands of cubic meters of sediment continue to wash down watersheds that were clearcut by the SFI-certified Pacific Lumber Company. These impacts continue even though these lands are now managed by the FSC-certified Humboldt Redwood Company (HRC). FSC’s stricter standards have been instrumental in providing HRC with a motive for eliminating clearcutting. This development has provided a glimmer of hope in our community for the recovery of these long abused forestlands. If FSC standards would allow clearcutting to return to this landscape, our members and the greater community would lose that hope for true forest restoration.

### **Clearcutting Is Not Ecologically Sustainable**

The systematic liquidation of forests in Pacific Coast states has resulted in landscape-

level impacts that are visible from space. These significantly adverse and cumulative impacts to fish, wildlife, forests, and watersheds have been well-documented in the scientific literature. Our comments below are a brief attempt to highlight some of these impacts, and we fully expect FSC to be fluent in the relevant literature concerning the impacts of clearcutting. Overall, we maintain that the rate and intensity of logging associated with clearcutting in fact leaves vast tracts of land incapable of supporting a diverse forest wildlife community.

### Species Extinction

As opposed to selective timber harvest, even-aged management leaves the landscape in a much degraded state, limiting its value to wildlife. For example, species threatened with extinction such as northern spotted owl, marbled murrelet, coho salmon, and Pacific fisher are fully extirpated from millions of acres of their historic range because of clearcutting native forests.

### Aquatic Impacts

Clearcutting can have disastrous impacts of watersheds. The wholesale removal of vegetation from the landscape means that rainfall hits bare ground and runs off more readily into waterways, rather than being captured by forest soils. The result is significantly higher sediment loads entering streams and rivers, and significantly lower volumes of water entering soils and groundwater.

### Pesticides

The use of clearcutting alters the forest ecosystem so significantly that the timber industry must use chemical herbicides to combat invasive weeds and undesirable native species that compete for sunlight in the clear cuts. The use of chemical herbicides is a direct result of intensive even-aged management regimes. Pesticides have been implicated as having severe public health impacts as well as adverse impacts to many sensitive species. For example, the National Marine Fisheries Service has evaluated many pesticides used in forestry and determined that they are jeopardizing endangered salmonids.<sup>1</sup> Additionally, the EPA has recently published effects determinations for several chemical herbicides on California Red-legged frogs.<sup>2</sup> These effects determinations included chemical herbicides that are commonly used in forestry applications. While these determinations are tailored specifically toward impacts to California Red-legged frogs, the findings can easily be extrapolated to raise significant concerns over the impacts of forestry herbicide applications on other amphibians. Many amphibians utilize habitats outside of riparian zones to complete essential life history behaviors such as feeding so even herbicide applications outside of the riparian zones can still have a significant, adverse impact on amphibians and other species.

### Carbon Storage

The logging method employed has a profound impact on the amount of carbon stored in

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<sup>1</sup> See: <http://www.nmfs.noaa.gov/pr/consultation/pesticides.htm>

<sup>2</sup> See: <http://www.epa.gov/oppfead1/endanger/litstatus/effects/redlegfrog/index.html>

forests, especially forest soils, and the amount of carbon dioxide released into the atmosphere. By far, clearcutting is the worst harvest method in terms of releasing carbon into the atmosphere. Forests in Pacific Coast have the ability to store more carbon per acre, across a large landscape, than virtually any other terrestrial ecosystem on the Earth. FSC should take into the account the impact of its standards on carbon storage in Pacific forests. Only by promoting logging methods that increase carbon storage on the landscape, can FSC standards be considered sustainable.

## Conclusion

Clearcutting is inconsistent with the vast majority of natural processes that result in tree mortality but leave behind legacy structures which are used by a wide variety of wildlife and fish. Also, clearcutting is already vastly overused method of forestry in this region so it has significant cumulative effects on soil, water, and wildlife. There will always be vast areas that are not certified that practice this unsustainable method of logging. To certify clearcutting would add to these unacceptable cumulative effects. We hope that this letter convinces FSC to move away from certifying clearcutting in the Pacific Coast states, and beyond.

Sincerely,



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