

Guidelines on Implementation of the Sierra Club's Policy Advocating an End to Commercial Logging on Federal Public Lands (ECL Policy)

While numerous written exchanges in 1995 and 1996 clarified the relationship of the ECL policy to Sierra Club activities, the passage of time and arrival of newer Club activists warrants a restatement of this relationship in order to provide guidance and consistency. These guidelines are divided into two parts: examples of things (a) that do not conflict with the ECL policy, and (b) that might conflict with the ECL policy.

No Conflict with the ECL Policy

The ECL policy does not preclude or prevent Club activists/entities from, for example:

Negotiating with a federal land management agency to improve a site-specific forest management project, or land management plan, and reduce its potential environmental impacts, even where the ultimate negotiated result is a project/plan that involves some commercial logging. As the proponents of the ECL policy made clear in numerous Sierra Club election communications in 1995 and 1996, the policy does not “tie the hands” of Club activists, staff, or entities seeking to reduce adverse impacts of projects/plans. To avoid confusion, in such cases it may be advisable for the Club entity/activist to describe the Club's position with regard to the commercial logging component of such a resulting project as one of non-opposition, rather than support (for example: “While we do not support the commercial logging components of this project [or plan], we feel that agency staff have negotiated in good faith, and have added numerous positive aspects [e.g., this might include things such as prescribed burning, logging road decommissioning, and/or snag creation for cavity-nesting wildlife, etc.] and have added significant mitigations to reduce adverse

impacts. For these reasons, though we oppose the commercial logging components, we do not oppose [or we support] the overall project [or plan]”).

Involvement in, or support of, personal use firewood permits for removal of small-diameter trees from federal lands for the permit holder’s use. Commercial logging is the removal of trees from federal lands as commodities -- whether for lumber (or other building materials), pulp/paper, energy, or other commodity production -- regardless of the stated rationale for the logging project, or whether some term other than commercial logging is used to describe the project. Removal of small quantities of wood material for personal use is not commercial logging. Similarly, an agency’s use of small trees cut on a national forest for infrastructure on that national forest (e.g., fencing along trails or interpretive centers) is not commercial logging.

Supporting proposed federal legislation or regulations that increase protections for federal public lands, but do not specifically end all commercial logging on the public lands covered by the proposed legislation.

Supporting proposed federal legislation or regulations that protect some federal lands but do not alter the multiple-use management outside of the protected areas. Legislation and

regulatory proposals vary widely and, as always, such proposals would be evaluated on a case-by-case basis.

Conflict or Potential Conflict with the ECL Policy

Things with the potential to conflict with the ECL policy could include:

Blocking, suppressing, or otherwise actively undermining the advocacy of an end to commercial logging on federal public lands by any Sierra Club volunteers, staff, or entities. In passing the ECL policy in 1996, the Sierra Club membership voted that the Sierra Club will “support protecting all federal publicly-owned lands in the United States by advocating an end to all commercial logging on these lands. As Sierra Club elections communications in 1995 and 1996 discussed in detail, the primary objective of the ECL ballot initiative was to allow Sierra Club activists, staff, and entities to advocate an end to commercial logging on our federal public lands. Whether in the context of comments on individual projects, forest plans, regulations, or proposed legislation, the passage of the ECL policy means that Sierra Club activists, staff, and entities may advocate for the ECL policy, and represents a commitment of the Sierra Club to advocacy of the ECL policy. Accordingly, reasonable accommodation of ECL advocacy must be made. At the same time, the Club should always strive to “speak with one voice.” ECL advocacy in particular contexts has the potential in some instances to lead to the Club taking inconsistent positions. By way of example, if a Club entity is successful in negotiating significant improvements to a site-specific project (or regional plan, etc) that reduce the adverse effects of logging and, in exchange for those improvements, agrees to drop its opposition, it would be inappropriate for another Club entity to continue to publicly oppose the project even if it still allows some commercial logging. Accordingly, in the course of such advocacy, reasonable notice and coordination among Sierra Club volunteers, staff and entities at different levels of the organization is expected. The ECL policy is a national Sierra Club policy, and chapters and other Club entities are not entitled to create alternate policies in favor of commercial logging on federal public lands.

Proposed legislation or regulations that would effectively foreclose options for future protection by explicitly committing or 'releasing ' certain federal lands to permanent or indefinite commercial

logging. Proposed legislation and regulations vary widely and, as always, such proposals would be evaluated on a case-by-case basis.

Supporting the construction/creation of a new mill/plant that would exclusively or primarily process trees removed from national forests as commodities. Such facilities are by nature indefinite in their duration and geographic scope. Supporting potentially permanent facilities designed to extract trees from national forests creates an inconsistency with the Club's policy of advocating an end to commercial logging on federal public lands.

Adopted by the Board of Directors, November 17, 2012