



December 8, 2006

Allison Welde
SFB Program Coordinator
Sustainable Forestry Board
1655 N Fort Myer Drive, Suite 1300
Arlington, VA 22209

Dear Ms. Welde,

The Natural Resources Council of Maine (Council) has focused on forest certification issues in Maine over the past decade. We attended the 2005 Sustainable Forestry Initiative (SFI) review workshop in Portland, Maine and have provided comments on the SFI standards in the past. Through our work on forest certification we have become very familiar with the SFI program and its goals.

We are writing to you today to ask you to suspend Seattle-based Plum Creek Timber's SFI certification for their land in Maine.

The Council recently uncovered information about Plum Creek Timber's forest management activities in Maine. We obtained documents relating to Plum Creek's forest practices in Maine through Maine's Freedom of Access Act. The information we found was very troubling. Because the Sustainable Forestry Board oversees participants in the SFI program we want to make sure you and the Board are aware of our findings. We've attached a copy of the full report for your review.

The documents we received came from Maine's Department of Conservation, Land Use Regulation Commission (LURC) and Maine Forest Service (MFS), Department of Inland Fisheries and Wildlife (IF&W), and Department of Environmental Protection (DEP).

One major finding was that Plum Creek was responsible for 18 violations of Maine's Forest Practices Act. These violations culminated in 2006, when Plum Creek was assessed the largest monetary penalty for violation of forestry laws in Maine history.

In addition to these forest practices violations, the report reveals a long-term systematic disregard for protection of critical Deer Wintering Areas, water quality violations, and violations of Maine's Land Use Regulation Commission's standards for development.

Each of these issues raises serious concerns about Plum Creek's commitment to sustainability. When taken together Plum Creek's activities demonstrate a pattern of violating Maine's environmental laws and raise the question of whether Plum Creek

meets the SFI's most basic requirements – to comply with forestry and environmental laws.

Plum Creek's activities also raise questions about the credibility of the SFI program which certified Plum Creek. Public statements and advertisements by the Sustainable Forestry Initiative and Plum Creek regularly assert the sustainability of forest management certified by SFI. We strongly question whether those assertions are misleading to the public.

Based on the information found in the public record and the standards of the SFI program, we request that Plum Creek's SFI certification be suspended. Plum Creek's certification should not be reinstated until a new audit shows that:

1. Plum Creek has in place a plan approved by Maine's Department of Inland Fisheries and Wildlife biologists to protect deer wintering areas and has complied with that plan for two years; and,
2. Plum Creek is found to be in full compliance with all of Maine's environmental and forestry laws for a period of at least two years from the date of the most recent fine (June 15, 2006).

We also request that Plum Creek be directed by SFI to immediately stop advertising that it practices sustainable forestry.

Prior to reinstating Plum Creek's certification, we request that a special audit be conducting certifying that Plum Creek has met the above conditions. Please send us a copy of that audit report.

Please let us know how you intend to proceed in light of these requests. We look forward to your response. If you have any questions please let us know.

Sincerely,

Catherine B. Johnson
Senior Staff Attorney

Enclosures:

NRCM Report, November 15, 2006
Chart showing fines paid for violation on Maine's Forest Practices Act
Photo of harvested deer wintering area

Cc: SFB Board Members
Rick Holley, Plum Creek
Jim Lehner, Plum Creek
Plum Creek Board members
Patrick Strauch, Maine SFI Implementation Committee

Alec Giffen, Director, Maine Forest Service
Patrick McGowan, Commissioner, Maine Department of Conservation
Dan Martin, Commissioner, Maine Department of Inland Fisheries and Wildlife
David Littell, Commissioner, Maine Department of Environmental Protection