

APPENDIX A
Exhibits to Center for Biological Diversity Comments
Proposed Cap and Trade Regulation
and Functional Equivalent Document
December 15, 2010

All files uploaded to www.arb.ca.gov (capandtrade10) in zipped PDF format

Exhibit	Title
1	Reed F. Noss, <i>Beyond Kyoto: Forest Management in a Time of Rapid Climate Change</i> , 15 CONSERVATION BIOLOGY 578 (2001).
2	D.P. Turner, et al., <i>A carbon budget for forests of the conterminous United States</i> , 5 ECOLOGICAL APPLICATIONS 421 (1995).
3	Mark E. Harmon, et al., <i>Effects on Carbon Storage of Conversion of Old-Growth Forests to Young Forests</i> , 247 SCIENCE 699 (1990).
4	Brendan Mackey, et al., <i>Green carbon: the role of natural forests in carbon storage. Part 1, A green carbon account of Australia's south-eastern Eucalypt forest, and policy implications</i> , The Fenner School of Environment & Society, The Australian National University (2008).
5	Robert Jandl, et al., <i>How Strongly Can Forest Management Influence Soil Carbon Sequestration?</i> , 137 GEODERMA 253 (2007).
6	R. Birdsey and L. S. Heath, <i>Carbon Changes in U. S. Forests</i> , in PRODUCTIVITY OF AMERICA'S FORESTS AND CLIMATE CHANGE (GTR-RM-271), edited by L. A. Joyce: USDA Forest Service, Rocky Mountain Research Station (1995).
7	Mark E. Harmon, 2009, <i>Woody Detritus Mass and its Contribution to Carbon Dynamics of Old-Growth Forests: the Temporal Context</i> , in C. Wirth et al. (eds.), OLD-GROWTH FORESTS, Ecological Studies 207 (2009).
8	Center for Biological Diversity, Letter to Climate Action Reserve Re: Preliminary Guidance on Forest Project Protocol, Section 6.2.1.1 (Legal Requirements for Project Baseline; Supplemental Comments) (April 30, 2010).
9	Center for Biological Diversity, Letter to Climate Action Reserve Re: Comments on Proposed Amendments to Baseline Determination of the Forest Project Protocol Version 3.1 (July 30, 2010).
10	Manomet Center for Conservation Sciences, <i>Massachusetts Biomass Sustainability and Carbon Policy Study: Report to the Commonwealth of Massachusetts Department of Energy Resources</i> (2010).
11	Gregory P. Asner, et al., <i>High-Resolution Forest Carbon Stocks and Emissions in the Amazon</i> , PROC. NAT'L ACADEMY OF SCI. EARLY EDITION, available at http://www.pnas.org/content/early/2010/08/30/1004875107 (last visited Sept. 12, 2010).
12	Michael G. Ryan, et al., <i>A Synthesis of the Science on Forests and Carbon for U.S. Forests</i> , Ecological Society of America: Issues in Ecology, Report No. 13 (Spring 2010).
13	Eric Johnson, <i>Goodbye to Carbon Neutral: Getting Biomass Footprints Right</i> , 29 ENVTL. IMPACT ASSESSMENT R. 165 (2008).

14	Jerry M. Melillo, et al., <i>Indirect Emissions from Biofuels: How Important?</i> SCIENCEEXPRESS 10.1126/science.1180251 (Oct. 22, 2009).
15	World Res. Inst., <i>State of the World's Forests</i> (Jan. 8, 2009), at http://www.wri.org/map/state-worlds-forests (last visited Sept. 12, 2010).
16	Matthew C. Hansen, et al., <i>Quantification of Global Gross Forest Cover Loss</i> , 107 PROC. NAT'L ACADEMY OF SCI. 8650 (May 11, 2010).
17	COMMITTEE ON STABILIZATION TARGETS FOR ATMOSPHERIC GREENHOUSE GAS CONCENTRATIONS; NATIONAL RESEARCH COUNCIL, <i>STABILIZATION TARGETS FOR ATMOSPHERIC GREENHOUSE GAS CONCENTRATIONS</i> (National Academies Press 2010) (excerpts).
18	Anna Repo, et al., <i>Indirect Carbon Dioxide Emissions from Producing Bioenergy from Forest Harvest Residues</i> , GLOBAL CHANGE BIOLOGY BIOENERGY (2010).
19	Alexander Gershenson et al., <i>Accounting for Carbon in Soils</i> , Climate Action Reserve White Paper (2010).
20	Mary S. Booth, <i>Review of the Manomet Biomass Sustainability and Carbon Policy Study</i> (July 2010).
21	Tara Hudiburg, et al., <i>Carbon Dynamics of Oregon and Northern California Forests and Potential Land-Based Carbon Storage</i> , 19 ECOLOGICAL APPLICATIONS 163 (2009).
22	Mark E. Harmon, et al., <i>Effects of Partial Harvest on the Carbon Stores in Douglas-fir/Western Hemlock Forests: A Simulation Study</i> , 12 ECOSYSTEMS 777 (2009).
23	Brooks M. Depro, et al., <i>Public Land, Timber Harvests, and Climate Mitigation: Quantifying Carbon Sequestration Potential on U.S. Public Timberlands</i> , 255 FOREST ECOLOGY & MGMT. 1122 (2008).
24	Heather Keith, et al., <i>Re-evaluation of Forest Biomass Carbon Stocks and Lessons from the World's Most Carbon-Dense Forests</i> , 106 PROC. NAT'L ACADEMY OF SCI. 11,635 (2009).
25	Lucas E. Nave, et al., <i>Harvest Impacts on Soil Carbon Storage in Temperate Forests</i> , 259 FOREST ECOLOGY & MGMT. 857 (2010).
26	Stephen R. Mitchell, et al., <i>Forest Fuel Reduction Alters Fire Severity and Long-Term Carbon Storage in Three Pacific Northwest Ecosystems</i> , 19 ECOLOGICAL APPLICATIONS 643 (2009).
27	CHAD HANSON, <i>THE MYTH OF "CATASTROPHIC" WILDFIRE: A NEW ECOLOGICAL PARADIGM OF FOREST HEALTH</i> (2010).
28	Giuliana Zanchi et al., <i>The Upfront Carbon Debt of Bioenergy</i> (May 2010).
29	James Hansen, et al., <i>Target Atmospheric CO₂: Where Should Humanity Aim?</i> , 2 OPEN ATMOS. SCI. J. 217 (2008).
30	Alliance of Small Island States, <i>Declaration on Climate Change 2009</i> (Sept. 21, 2009).
31	B. Hare & M. Meinshausen, <i>How Much Warming Are We Committed To and How Much Can Be Avoided?</i> , 75 CLIMATIC CHANGE 111 (2006).
32	IAN ALLISON, ET AL., <i>THE COPENHAGEN DIAGNOSIS: UPDATING THE WORLD ON THE LATEST CLIMATE SCIENCE</i> (2009).

33	M. den Elzen & N. Höhne, <i>Reductions of Greenhouse Gas Emissions in Annex I and Non-Annex I Countries for Meeting Concentration Stabilisation Targets</i> , 91 CLIMATIC CHANGE 249 (2008).
34	M. O'Hare et al., <i>Proper Accounting for Time Increases Crop-Based Biofuels' Greenhouse Gas Deficit Versus Petroleum</i> , 4 ENVTL. RESEARCH LETT. 024001 (2009).
35	U.S. EPA, <i>EPA Lifecycle Analysis of Greenhouse Gas Emissions from Renewable Fuels</i> (2009).
36	MARY S. BOOTH AND RICHARD WILES, CLEARCUT DISASTER: CARBON LOOPHOLE THREATENS U.S. FORESTS (Environmental Working Group 2010).
37	Timothy Searchinger, et al., <i>Fixing a Critical Climate Accounting Error</i> , 326 SCIENCE 527, 527 (2009).
38	Cal. Energy Comm'n, California Energy Demand 2010-2020: Adopted Forecast, Report No. CEC-200-2009-012-CMF (Dec. 2009) (Exec. Summ.).
39	Sierra Pacific Indus., Media Release, <i>Sierra Pacific Industries to Close its Loyalton, CA Power Plant</i> (Aug. 20, 2010).
40	Marshall Wise, et al., <i>Implications of Limiting CO₂ Concentrations for Land Use and Energy</i> , 324 SCIENCE 1183 (2009).
41	Garrett W. Meigs, et al., <i>Forest Fire Impacts on Carbon Uptake, Storage, and Emission: The Role of Burn Severity in the Eastern Cascades, Oregon</i> , 12 ECOSYSTEMS 1246 (2009).
42	Garrett W. Meigs and John L. Campbell, <i>Comment on "Prescribed Fire As a Means of Reducing Forest Carbon Emissions in the Western United States"</i> 44 ENVTL. SCI. & TECH. 6250 (2010) (prepublication version).
43	Timothy Searchinger, <i>Biofuels and the Need for Additional Carbon</i> , ENVIRON. RES. LETT. 5 (2010) 024007.
44	Rhett A. Butler, et al., <i>REDD in the Red: Palm Oil Could Undermine Carbon Payment Schemes</i> , 2 CONS. LETT. 67 (2009).
45	Birka Wicke, et al., <i>Different Palm Oil Production Systems for Energy Purposes and their Greenhouse Gas Implications</i> , 32 BIOMASS AND BIOENERGY 1322 (2008).
46	Holly K. Gibbs, et al., <i>Carbon Payback Times for Crop-Based Biofuel Expansion in the Tropics: The Effects of Changing Yield and Technology</i> , ENVIRON. RES. LETT. 3 (2008) 034001.
47	Tom Beer, et al., <i>The Greenhouse and Air Quality Emissions of Biodiesel Blends in Australia</i> , CSIRO Report Number KS54C/1/F2.27 (August 2007).