

**Form Letter 1 for Comment 154 for California Cap-and-Trade Program  
(capandtrade10) - 45 Day.**

First Name: Janet

Last Name: Ostroff

Email Address: janetostroff2@yahoo.com

Affiliation:

Subject: Clear Cutting in our Forests

Comment:

Including clearcutting in your program calls into question the credibility of the program (particularly for additionality, verifiability and leakage). It will allow the facilities with greatest emissions (cement kilns, power plants and refineries) to avoid reductions by purchasing highly questionable clearcut offsets, subsidizing the most aggressive and intrusive forest harvest techniques.

California 's working timberlands are also important for the ecological services they provide, not only for nature, habitat and wildlife, but for people too. Our forests are the lungs of the earth that purify our air. Our forests control sedimentation and temperature of the waters we drink, and on which our salmon depend for reproduction. Even aged, clearcut forests are less resilient, more prone to fire and disease, and provide less diversity of habitat for the species on which nature and Californians depend.

Protect the integrity of the climate program and resiliency of California's forests by: a) eliminating from the offset program clearcutting of our forests as a way of sequestering carbon; b) adding provisions to assure that forest projects DO NOT result in the conversion of naturally managed (uneven aged forests) into clearcut plantations (even aged forests).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-05 18:59:49

**Form Letter 2 for Comment 154 for California Cap-and-Trade Program  
(capandtrade10) - 45 Day.**

First Name: Bret

Last Name: Miracle

Email Address: iskimtns@hotmail.com

Affiliation:

Subject: cap and trade

Comment:

Including clearcutting in your program calls into question the credibility of the program (particularly for additionality, verifiability and leakage). It will allow the facilities with greatest emissions (cement kilns, power plants and refineries) to avoid reductions by purchasing highly questionable clearcut offsets, subsidizing the most aggressive and intrusive forest harvest techniques.

Protect the integrity of the climate program and resiliency of California's forests by eliminating from the offset program clearcutting of our forests as a way of sequestering carbon.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-06 19:41:48

**Form Letter 3 for Comment 154 for California Cap-and-Trade Program  
(capandtrade10) - 45 Day.**

First Name: Sherrill

Last Name: Futrell

Email Address: safutrell@ucdavis.edu

Affiliation:

Subject: capandtrade10

Comment:

Protect the integrity of the climate program by eliminating from the offset program clearcutting of our forests as a way of sequestering carbon. Including clearcutting in your program calls into question the credibility of the program. It will allow the facilities with greatest emissions to avoid reductions by purchasing highly questionable clearcut offsets, subsidizing the most aggressive and intrusive forest harvest techniques. It's bogus. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-08 20:21:18

**Form Letter 4 for Comment 154 for California Cap-and-Trade Program  
(capandtrade10) - 45 Day.**

First Name: Erin

Last Name: Ross

Email Address: erin@gettingthatyoumatter.com

Affiliation:

Subject: capandtrade10

Comment:

To whom it may concern:

I am a strong supporter of our great state of California doing everything we can to mitigate the effects of climate change. However, we cannot and should not allow clearcutting to be a part of that mitigation process.

I am appalled to hear that clearcutting is included in your proposed program; this very fact calls into question the credibility of the program as a whole. If allowed to pass, it will allow the facilities with greatest emissions (cement kilns, power plants and refineries) to avoid reductions by purchasing highly questionable clearcut offsets, subsidizing the most aggressive and intrusive forest harvest techniques. This is borrowing from Peter to pay Paul and makes no sense whatsoever.

California 's working timberlands are vitally important for the ecological services they provide, not only for habitat and wildlife, but for the quality of life for all. Our forests purify our air, control sedimentation and regulate temperature. Even aged, clearcut forests are less resilient, more prone to fire and disease, and provide less diversity of habitat for the species on which nature and Californians depend.

Not all offsets are created equal. California should adopt only programs that will most reliably assure actual sequestration and avoid those that ignore carbon impacts of entire components of activities seeking to be called "offsets" such as clearcuts. We should particularly avoid subsidizing clearcuts because they are extremely difficult to assure additionality, and they also pose massive environmental risks.

Protect the integrity of the climate program and resiliency of California's forests by eliminating from the offset program clearcutting of our forests as a way of sequestering carbon, and by adding provisions to assure that forest projects do NOT result in the conversion of naturally managed (uneven aged forests) into clearcut plantations (even aged forests).

WE CANNOT CLEARCUT OUR WAY OUT OF CLIMATE CHANGE.

Thank you for your time.

Sincerely,  
Erin Ross

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-09 14:11:04

**Form Letter 5 for Comment 154 for California Cap-and-Trade Program  
(capandtrade10) - 45 Day.**

First Name: Keri

Last Name: Coughlan

Email Address: kericoughlan@umail.ucsb.edu

Affiliation:

Subject: can't clearcut our way to climate change

Comment:

protect the integrity of the climate program and resiliency of  
California's forests by eliminating from the offset program  
clearcutting of our forests as a way of sequestering carbon.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 01:08:11

**Form Letter 6 for Comment 154 for California Cap-and-Trade Program  
(capandtrade10) - 45 Day.**

First Name: Diane  
Last Name: Beck  
Email Address: dfbeck@northcoast.com  
Affiliation: Redwood Chapter, Sierra Club

Subject: Cap & Trade Program: Clearcuts  
Comment:

Redwood Chapter  
55A Ridgway Avenue, Santa Rosa, CA  
P.O. Box 466, Santa Rosa CA 95402  
(707) 544-7651  
Fax (707) 544-9861  
<http://www.redwood.sierraclub.org/>

Clerk of the Board,  
Air Resources Board  
1001 I Street  
Sacramento, California 95814  
December 12, 2010

Re: Cap and Trade Program: Clearcuts

The Redwood Chapter of the Sierra Club, the nation's largest and oldest environmental organization, represents more than 9000 Club members in northwestern California.

On December 16, 2010, the Air Resources Board (ARB) is scheduled to consider adoption of the regulations for its Cap & Trade Program. One portion of the regulations would allow the largest emitters of greenhouse gases (GHGs) to offset some of their emissions (instead of reducing them) by buying credits for sequestration of extra carbon in California's forests in three ways: a) reforestation; b) preventing conversion of forest land to other uses (golf courses, development and shopping centers); and, c) "improved forest management practices." Unfortunately there is nothing explicit in the protocol that will prevent a clear cutter from using these subsidies to convert our naturally managed forest into clearcut "tree plantations".

To allow clearcutting in your program would call into question the credibility of the program. It would allow the facilities with greatest emissions (cement kilns, power plants and refineries) to avoid reductions by purchasing highly questionable clearcut offsets subsidizing the most aggressive and intrusive forest harvest techniques. California's working timberlands are important for the ecological services they provide. Our forests are the lungs of the earth, and control sedimentation and temperature of the waters we drink, and on which our salmon depend for reproduction. Even aged, clearcut forests are less resilient, more prone to fire and disease, and provide less diversity of habitat for the species on which nature and Californians depend.

Not all offsets are created equal. This is a novel program and the accounting issues are complicated. We should adopt only programs that will most reliably assure actual sequestration and avoid those that ignore carbon impacts of entire components of the activity seeking to be called an "offset" such as clearcuts. We should particularly avoid subsidizing clearcuts because they are extremely difficult to assure additionality, and they also pose big environmental risks. Please protect the integrity of the climate program and resiliency of California's forests by eliminating from the offset program clearcutting of our forests as a way of sequestering carbon.

Sincerely,

Diane Beck, Conservation Chair  
Redwood Chapter, Sierra Club

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/762-arb\\_re\\_clearcutting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/762-arb_re_clearcutting.pdf)

Original File Name: ARB\_Re\_Clearcutting.pdf

Date and Time Comment Was Submitted: 2010-12-12 09:30:14



## **Form Letter 7 for Comment 154 for California Cap-and-Trade Program (capandtrade10) - 45 Day.**

First Name: Diane

Last Name: Beck

Email Address: dfbeck@northcoast.com

Affiliation: Redwood Chapter, Sierra Club

Subject: Cap & Trade Program: Clearcuts

Comment:

Redwood Chapter

55A Ridgway Avenue, Santa Rosa, CA

P.O. Box 466, Santa Rosa CA 95402

(707) 544-7651

Fax (707) 544-9861

<http://www.redwood.sierraclub.org/>

Clerk of the Board,

Air Resources Board

1001 I Street

Sacramento, California 95814

December 12, 2010

Re: Cap and Trade Program, Clearcuts

The Redwood Chapter of the Sierra Club, the nation's largest and oldest environmental organization, represents more than 9000 Club members in northwestern California.

On December 16, 2010, the Air Resources Board (ARB) is scheduled to consider adoption of the regulations for its Cap & Trade Program. One portion of the regulations would allow the largest emitters of greenhouse gases (GHGs) to offset some of their emissions (instead of reducing them) by buying credits for sequestration of extra carbon in California's forests in three ways: a) reforestation; b) preventing conversion of forest land to other uses (golf courses, development and shopping centers); and, c) "improved forest management practices." Unfortunately there is nothing explicit in the protocol that will prevent a clear cutter from using these subsidies to convert our naturally managed forest into clearcut "tree plantations".

To allow clearcutting in your program would call into question the credibility of the program. It would allow the facilities with greatest emissions (cement kilns, power plants and refineries) to avoid reductions by purchasing highly questionable clearcut offsets subsidizing the most aggressive and intrusive forest harvest techniques. California's working timberlands are important for the ecological services they provide. Our forests are the lungs of the earth, and control sedimentation and temperature of the waters we drink, and on which our salmon depend for reproduction. Evenaged, clearcut forests are less resilient, more prone to fire and disease, and provide less diversity of habitat for the species on which nature and Californians depend.

Not all offsets are created equal. This is a novel program and the accounting issues are complicated. We should adopt only programs that will most reliably assure actual sequestration and avoid those that ignore carbon impacts of entire components of the activity seeking to be called an "offset" such as clearcuts. We should particularly avoid subsidizing clearcuts because they are extremely difficult to assure additionality, and they also pose big environmental risks. Please protect the integrity of the climate program and resiliency of California's forests by eliminating from the offset program clearcutting of our forests as a way of sequestering carbon.

Sincerely,  
Diane Beck, Conservation Chair  
Redwood Chapter, Sierra Club

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/930-arb\\_re\\_clearcutting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/930-arb_re_clearcutting.pdf)

Original File Name: ARB\_Re\_Clearcutting.pdf

Date and Time Comment Was Submitted: 2010-12-14 09:49:34

**Form Letter 8 for Comment 154 for California Cap-and-Trade Program  
(capandtrade10) - 45 Day.**

First Name: Barbara

Last Name: Rivenes

Email Address: brivenes@sbcglobal.net

Affiliation:

Subject: CA Forest Resource Use in Carbon Offset Program

Comment:

To: California Air Resources Board

At your hearing this week you will be adopting protocols on the use of California's forest resources in the Climate Action Reserve program. I urge that you reject the current proposal to use (or permit) clearcutting methods in the offset program for sequestering carbon. California's forests are the lungs and filters for our air and water. This is not a hyperbolic statement and should be taken seriously by those considering the protocols which could essentially damage those natural processes.

The carbon emissions from clearcutting—which includes all the impacts from soil disturbance—are not offset for 80 to 100 years or more. We do not have time to wait that long, in the battle to save the planet from global warming. Under this plan, polluters will be able to trade their emissions for credits from forestry “offsets” that are not offsets at all, and will only serve to hasten the demise of the planet and California’s rich biological heritage. And, California’s forests are more than chunks of carbon; California’s Sierra Nevada and Klamath-Siskiyou forests are designated global biodiversity hotspots. Clearcutting – as practiced by the majority of timber companies in the state and sanctioned by our state regulators—permanently eliminates habitat for entire suites of plants and wipes out the entire home ranges for dozens of animals. Even though trees are replanted, the resulting tree farm bears nothing in common with a natural forest (except for the presence of one or two species of conifers).

Again, I urge you to protect the integrity of the climate program and resiliency of California's forests by: a) eliminating from the program clearcutting of our forests as a way of sequestering carbon; b) adding provisions to assure that forest projects do not result in the conversion of naturally managed practices into clearcut plantations.

Thank you for consideration of my comments.

Sincerely,  
Barbara Rivenes  
Nevada City

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 18:40:43

**Form Letter 9 for Comment 154 for California Cap-and-Trade Program  
(capandtrade10) - 45 Day.**

First Name: Rudolph  
Last Name: Darling  
Email Address: [rdarling@sbbmail.com](mailto:rdarling@sbbmail.com)  
Affiliation:

Subject: Compliance Offset Protocols  
Comment:

The ARB plan permits timber companies to clearcut California's forests, while allowing the companies to sell "credits" in the process. Since trees take at least 80 to 100 years to recoup their carbon emissions after clearcutting, there is no credible justification for permitting this type of trading. Many timber companies re-plant after clear-cutting anyway and paying them to do so just encourages them to clear-cut even more. I see no merit to this ill-advised scheme.

The carbon emissions from clearcutting—which includes all the impacts from soil disturbance—are not offset for 80 to 100 years or more. We do not have time to wait that long, in the battle to save the planet from global warming. Under this plan, polluters will be able to trade their emissions for credits from forestry "offsets" that are not offsets at all, and will only serve to hasten the demise of the planet and California's rich biological heritage. California's Sierra Nevada and Klamath-Siskiyou forests are designated global biodiversity hotspots. Clearcutting – as practiced by the majority of timber companies in the state and sanctioned by our state regulators—permanently eliminates habitat for entire suites of plants and wipes out the entire home ranges for dozens of animals. Even though trees are replanted, the resulting tree farm bears nothing in common with a natural forest (except for the presence of one or two species of conifers).

Please strip this provision from the protocol and disallow clearcutting.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 19:21:47

## **Form Letter 10 for Comment 154 for California Cap-and-Trade Program (capandtrade10) - 45 Day.**

First Name: Patricia

Last Name: Lind

Email Address: patricial@pitriverhealthservice.org

Affiliation:

Subject: Form Letter

Comment:

The Honorable Mary Nichols, Chair  
California Air Resources Board

RE: The Forest Carbon Offset Program Should Not Encourage Forest  
Clearcutting

Dear Ms. Nichols and members of the California Air Resources Board:

I am writing as a concerned citizen to urge you to amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program, in order to protect forests and the wildlife that rely on them. I implore you not to make forest clearcutting the face of AB 32. In most civilized society clearcutting forests is a mistake of the past. In California private land owners are still allowed by law to due large clearcuts that devastate the forests habitat. These clearcuts cause air pollution, pollution to watersheds due to use of pesticides and insecticides and massive loss of species due to plantation style forestry utilizing only few tree species. Clearcutting releases much carbon and early succesional species as Manzanita and brush take over a site thus increasing the risk of fire danger to a region.

ARB's proposed cap-and-trade rule currently not only explicitly invites forest clearcutting as a carbon offset project, but also incentivizes the conversion of natural forests into tree farms. This is no solution to climate change, and further threatens forest ecosystems and wildlife already at risk from global warming.

Forest clearcutting and the conversion of native forests to tree plantations pose great risk to the climate, while simultaneously degrading forest ecosystems, water quality, and wildlife habitat, and impairing the forest's resilience to the impacts of climate change.

In its current form, the forest protocol lacks credibility because it would subsidize the most intensive and environmentally risky timber operations in order to provide carbon offsets that would allow power plants, oil refineries, and industrial polluters to avoid upgrading their facilities to adopt less polluting technologies. At the same time, the forest protocol fails to account for greenhouse gas emissions associated with logging slash and debris, dead trees, roots and soil, all of which are much greater for forest clearcutting than for native forest management. This is no gold standard.

Not all offsets are created equal. ARB should consider only programs that can reliably assure carbon sequestration and avoid those that introduce additional environmental risks. We can not clearcut our way out of climate change. Rather than promoting the conversion of native forests to a patchwork of 40 acre clearcuts, California should use this opportunity to incentivize the best kinds and "green" forms of forest management, which can benefit both the climate and the forest.

The forest protocol offers many other options that meet these criteria: reforestation projects; preventing the conversion of forests to development; and the conservation of forest resources. Change of laws to stop clearcuts on private forest land!

For all these reasons, I urge the Air Resources Board to uphold the vision and initial intentions of the forest carbon program and AB 32, by amending the forest protocol to protect forest ecosystems and resources.

1) First and foremost, do not include forest clearcutting as part of the California's cap-and-trade offset program.

2) In addition, the forest protocol should not be part of the proposed cap-and-trade rule unless, at the minimum, the following critical amendments are adopted:

a. A Forest Project may not include conversion of native forest stands comprised of multiple ages or mixed native species to even-age or monoculture management, and may not include even-age management of any stand that had been converted to even-age or monoculture management in the harvest cycle preceding the registration of the Forest Project.

b. Forest carbon offset projects must account for changes in down and dead wood and soil carbon pools. Forest Projects that include timber harvesting are required to account for changes in the following forest carbon pools: lying dead wood, and soil carbon.

Healthy forests are a critical component of California's environment, economy, and quality of life, providing jobs and recreational opportunities, wildlife habitat, clean air and clean water. Healthy and resilient forests are also an important component of California's effort to reduce statewide greenhouse gas emissions, and ARB should consider only programs that can both reliably assure the value of carbon offset projects and protect forest from additional environmental risks.

The failure to fully account for the carbon consequences of harvest practices poses risks to the integrity of the entire program and increases the potential for unintended impacts to our forests.

I urge you to make these crucial amendments in order to ensure that California's cap-and-trade rule does not subsidize environmentally damaging forest management activities or the conversion of natural forests into tree farms.

Sincerely,

Your name

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 15:11:00