County of Santa Cruz

BOARD OF SUPERVISORS

701 OCEAN STREET, SUITE 500, SANTA CRUZ, CA 95060-4069
(831) 454-2200 • FAX: (831) 454-3262 TDD: (831) 454-2123

JOHN LEOPOLD	ELLEN PIRIE	NEAL COONERTY	TONY CAMPOS	MARK W. STONE
FIRST DISTRICT	SECOND DISTRICT	THIRD DISTRICT	FOURTH DISTRICT	FIFTH DISTRICT

December 14, 2010

Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: EXCLUSION OF FOREST CLEARCUTTING FROM THE FOREST CARBON OFFSET PROGRAM

Dear Chair Nichols and Members of the Board:

I am writing on behalf of the Santa Cruz County Board of Supervisors to urge the California Air Resources Board (ARB) to amend the proposed Forest Carbon Offset Program to exclude forest clearcutting in order to protect forests and the wildlife that rely on them. As written, this proposed rule would not only subsidize the most environmentally damaging logging practices, but could also incentivize the conversion of natural forests into tree farms.

As you know, because of its many acknowledged environmental impacts, clearcutting is virtually prohibited by the State in the timber producing counties of the central coast, including Santa Cruz, San Mateo, and Santa Clara Counties.

Cap-and-trade has proven in the past to be an efficient policy tool for reducing regional pollution levels. A cap-and-trade program could also be an effective policy tool to reduce carbon in the atmosphere, when paired with a program to reduce carbon emissions. Recognizing that forests remove and store immense amounts of carbon from the atmosphere, ARB's current proposal seeks to issue carbon credits to landowners who manage forests using standards to increase carbon storage.

Managing local forests for carbon sequestration has great potential to offset carbon emissions. For example, the Sempervirens Fund purchased the 425 acre Lompico Headwaters forest property in Santa Cruz County from a timber company in 2006, preventing this 100 year old forest from being logged. Sempervirens Fund subsequently verified that the additional

amount of carbon that would be stored through the continued growth of its redwoods is equivalent to the greenhouse gas emissions of more than 2,600 cars for one year (Sempervirens Fund, 2010).

However, a looming problem with ARB's proposal is that a large number of carbon offset credits issued throughout the state could come from forest management projects that allow clearcutting.

Therefore, the Santa Cruz County Board of Supervisors urges that the California Air Resources Board amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program.

Sincerely,

TONY CAMPOS, Chairperson
Board of Supervisors

TC:ted

cc: Santa Cruz County Commission on the Environment
Santa Cruz County Fish and Game Advisory Commission
Sierra Club - Santa Cruz Regional Group
Sierra Club - California
Clerk of the Board

5200A6