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Cascade Action Now • Center for Biological Diversity • Central California Forest Watch
Central Sierra Environmental Resource Center • Conservation Congress
Defenders of Wildlife • Ebbetts Pass Forest Watch • Environment Now
Environmental Protection Information Center • Forest Ethics • Forest Forever
Forest Issues Group • Forest Unlimited • Friends of Lassen Forest • Friends of the Earth
John Muir Project • Northcoast Environmental Center • Sequoia ForestKeeper
Sierra Club California • Sierra People's Forest Service • StopClearcuttingCalifornia.org

September 23, 2009

Mary Nichols, Chair
California Air Resources Board
1001 I. Street
P.O. Box 2815
Sacramento, CA 95812

Re: Opposition to the Forest Clearcutting Provision in the Forest Project Protocols

Dear Chairman Nichols and members of the California Air Resources Board:

We are writing on behalf of the undersigned organizations to express our strong opposition to the forest clearcutting provision in the current version of the forest project protocols, and to urge you not to adopt the protocols with this provision included.

At the upcoming September 24 meeting, the California Air Resources Board is scheduled to consider for adoption the “Updated Forest Project Protocols for Greenhouse Gas Accounting.” These protocols contain a provision, inserted as a single new paragraph by Climate Action Reserve staff into the June 22, 2009, version of the updates, which appears intended to allow clearcutting:

Harvesting using even-age management must be conducted in stands no greater than 40 acres. Stands adjacent to recently harvested (even-age) stands must not be harvested using an even aged regeneration harvest until a recent even-aged regeneration harvested stand is 5-years old, or the average height of the regeneration in the recently harvested stand has achieved a height of 5 feet. On a watershed scale up to 10,000 acres all projects must maintain, or make progress toward maintaining, no more than 40 percent of their forested acres in ages less than 20 years. Areas impacted by a Significant Disturbance are exempt from this test until 20 years after reforestation of such areas. (Section 3.9)

This paragraph is entirely inconsistent with, and explicitly contradicted by, the definition of “natural forest management” in the same protocols, which requires forest projects to “*promote and maintain a diversity of native species and utilize management practices*

that promote and maintain native forests comprised of multiple ages and mixed native species at multiple landscape scales.” (Sec. 3.9.2). It is impossible for even-aged management, particularly clearcutting, to meet those overarching requirements.

Forest clearcutting is not the solution for achieving greenhouse gas reductions in California. Scientific studies show that forest clear-cutting is the worst option for reducing forest carbon emissions, and that it has devastating impacts on California’s forests, water, biodiversity, and fish and wildlife. Moreover, the forest protocols were purportedly designed not only to help achieve greenhouse gas reductions, but also to provide a range of significant public and environmental benefits including clean water, biodiversity, fish and wildlife habitat, recreation, and aesthetics. The newly included paragraph incorrectly implies that clearcutting can achieve these goals, when in actuality the new paragraph would allow practices that exacerbate climate change while simultaneously causing a loss of important co-benefits for fish and wildlife habitat and biodiversity in California and other states.

If the intention of the new paragraph is to extend to other states the environmental safeguards currently applied to California’s forests, then it is severely lacking. By offering a definition of clearcutting that omits critical regulations that limit clearcutting in California, the protocols succeed only in watering down California’s forest protections to the point that they are seriously deficient and unrecognizable. Furthermore, the California Air Resources Board should not be in the business of encouraging the clearcutting of California or any other state, particularly when such practices are likely to exacerbate climate change while simultaneously degrading forest ecosystems and fish and wildlife habitat.

Given the misleading nature of the provision, and the potentially extreme negative environmental impacts associated with clearcutting, we urge the Air Resources Board to eliminate the forest clearcutting provision before adoption of the protocols. At the very least, we ask that you postpone adoption of the protocols to allow the Air Resources Board time to consider the implications of the provision following the September Board meeting.

Thank you for considering these comments.

Sincerely,

Brian Nowicki
Center for Biological Diversity

Michael Endicott
Sierra Club California

Susan Robinson
Ebbetts Pass Forest Watch

Kim Delfino
Defenders of Wildlife

Scott Greacen
Environmental Protection Information Center

Dan Taylor
Audubon California

John Buckley,
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Paul Hughes
Forest Forever

Sue Lynn
Cascade Action Now (CAN!)

Don Rivenes
Forest Issues Group

Laurie Davis
Friends of Lassen Forest

Joni Frediani
Central California Forest Watch

Danielle Fugere
Friends of the Earth

Denise Boggs
Conservation Congress

Martin Litton
Sequoia ForestKeeper

Pete Nichols
Northcoast Environmental Center

Shera Blume
Sierra People's Forest Service

Joshua Buswell- Charkow
Forest Ethics

Larry Hanson
Forest Unlimited

Laureen Claire
StopClearcuttingCalifornia.org

Marily Woodhouse
Battle Creek Alliance

Terry O'Day
Environment Now

Stephanie Tidwell
Klamath-Siskiyou Wildlands Center

Rene Voss
John Muir Project

Jim Brobeck
Butte Environmental Council