



September 23, 2009

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

**Re: Forest Clearcutting Provisions in the Forest Project Protocols**

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

Central Sierra Audubon Society is very concerned regarding the forest clearcutting provisions in the current version of the protocols from CAR that you are due to consider adopting on September 24<sup>th</sup>. We strongly support the letter of opposition submitted by the Center for Biological Diversity et al, and emphasize that we believe the draft protocol, which doubles the allowable size of clearcuts under the State's current Forest Practices Rules from 20 acres to 40 acres, to be an egregious proposal.

We are, of course, greatly concerned with bird conservation and wish to make it clear that clearcutting methods of logging are detrimental to habitats necessary for bird breeding and over-wintering. Physical destruction of habitats is further exacerbated by the standard application of herbicides accompanying clearcutting, which reduces shrubs and bushes necessary for many birds. Those chemicals also reduce the arthropod prey base required, particularly in the critical breeding period when insects and so on are the primary food for young birds.

Furthermore, given the long migrations of many bird species, it is critical that healthy habitats be maintained nationally and internationally. We are aware that any protocols adopted by CARB will set trends and protocols internationally as well as nationally – indeed, the CCAR website state quite explicitly: “*The California Registry is regarded as a leading international thought center on climate change issues and an intersection where business, government and environmental organizations meet to work together to implement practical and effective solutions*”.

It would be an unmitigated disaster for bird species worldwide if these protocols were to become regarded as the baseline standard for carbon emissions reductions, and so we request and urge rejection of this particular provision. Our conservation colleagues in Central and South America would be horrified if California were to adopt this clearcutting protocol even as they are working against tough odds to preserve bird habitats.

Since some CARB members may not be familiar with destructive clearcutting practices, the following 2 pages show typical scenarios in Calaveras County that are replicated across the Sierra.

Sincerely,

John Turner  
President, Central Sierra Audubon Society





This is part of a 17.4-acre clearcut unit in Sierra Pacific Industry’s “Spur 11” timber harvest plan in Calaveras County. The plan covers 209 acres and includes 11 clearcut units. Such units are spaced with trees between them, but after 5 years the adjacent patches may also be clearcut, resulting in a mosaic of even-age plantations that are highly vulnerable to intense crown fires. Note the slash piles and, in the background, the plantation following a previous logging operation – see greater detail below.







Here we can see a series of clearcut or near-clearcut units (generically known as “even-age management”) in which the each unit will be re-grown as a plantation with all trees of the same age. There will be some species variation, but generally most of the new trees will grow at the same rate such that they are highly vulnerable to intense crown fires sweeping through them. They are also more vulnerable to disease and infestation than “uneven-age” stands where more species variation and sizes make for a more robust forest.

Here we see a 250-year old Sugar Pine logged close to Blue Creek as part of the Spur 11 plan. This tree with a 60” diameter was healthy, still growing, and still sequestering carbon not only above ground, but also below ground in its root system. Young trees re-grown as part of the timber harvesting plan will take 20 or more years to compare with this tree in terms of carbon sequestration.



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