Mary Nichols, Chairperson September 22, 2009

California Air Resources Board

1001 I. Street

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Re: Updated Forest Project Protocols for Greenhouse Gas Accounting.

On June 22, 2009 a new paragraph by Climate Action Reserve staff was inserted into the original document. Please see my comments regarding the following paragraph that was inserted late in the public review process:

*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)

1st sentence. Even-age management is another way of saying ‘clear-cut 40-acres of the natural forest and plant an even-age mono-crop of all the same species, creating a plantation, a tree farm. Take down all the oaks, madrones and other trees that sequester carbon and provide wildlife habitat. And spray everything with herbicides.” Even-age management i.e. clearcutting is currently restricted to 20-acre THPs on private lands that mostly belong to very large logging companies.

2nd sentence. Then when those plantation trees are 5-years old, or 5-feet tall on 40 acres, the adjacent 40 acres, of the natural forest around them can be clear-cut and turned into an even-age mono-crop of all the same species, creating a plantation, a tree farm. More herbicides, more warming of the air, water and soil. More loss of wildlife habitat.

3rd sentence. This new paragraph goes onto say that 40% of one watershed, can have these even-age managed forests. I would venture to say that all the forests in California are in one watershed or the other. Does this mean 40% of California’s forests would be tree farms. The impact of those even-age managed 5-foot tall forests, deluged with herbicides and pesticides, on each of these watershed, where over 65% of Californian’s water comes from, would be unimaginable.

 In the next few days, when you make your decisions about the fate of California forests please ask yourself these questions. Where is the wildlife going to live? How is the water in the streams going to stay at the correct temperature for fish and other aquatic life? How is a little tiny tree going to replace all the carbon sequestering that larger trees do? How is rainfall going to be held back in the soil so that it does not all run off at once? Who will ultimately benefit from this addition to the Protocols.

Californian’s and the planet need the trees to remain in the natural forests. We need more trees, such as oaks to be planted in the valleys where they used to grow in great abundance. We need sustainable logging where all native species of trees and wildlife are thriving. Please remove the above paragraph from the Forest Project Protocol for Greenhouse Gas Accounting.

Sincerely,

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