

September 17, 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,

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