Form Letter 1 for Comment 119 for California Cap-and-Trade Program (capandtrade10) - 45 Day.

First Name: Nury
Last Name: Enciso
Email Address: nuryenciso@gmail.com
Affiliation:

Subject: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting
Comment:

The Honorable Mary Nichols, Chair
California Air Resources Board

Dear Ms. Nichols and members of the California Air Resources Board:

I am writing to urge the California Air Resources Board (ARB) to amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program, in order to protect forests and the wildlife that rely on them. I implore you not to make forest clearcutting the face of AB 32. California cannot and should not try to clearcut our way out of climate change.

ARB's proposed cap-and-trade rule currently not only explicitly invites forest clearcutting as a carbon offset project, but also incentivizes the conversion of natural forests into tree farms. This is no solution to climate change, and further threatens forest ecosystems and wildlife already at risk from global warming.

Forest clearcutting and the conversion of native forests to tree plantations pose great risk to the climate, while simultaneously degrading forest ecosystems, water quality, and wildlife habitat, and impairing the forest's resilience to the impacts of climate change.

In its current form, the forest protocol lacks credibility because it would subsidize the most intensive and environmentally risky timber operations in order to provide carbon offsets that would allow power plants, oil refineries, and industrial polluters to avoid upgrading their facilities to adopt less polluting technologies. At the same time, the forest protocol fails to account for greenhouse gas emissions associated with logging slash and debris, dead trees, roots and soil, all of which are much greater for forest clearcutting than for native forest management. This is no gold standard.

Not all offsets are created equal. ARB should consider only programs that can reliably assure carbon sequestration and avoid those that introduce additional environmental risks. We can not clearcut our way out of climate change. Rather than promoting the conversion of native forests to a patchwork of 40 acre clearcuts, California should use this opportunity to incentivize the best kinds and "green" forms of forest management, which can benefit

both the climate and the forest.

The forest protocol offers many other options that meet these criteria: reforestation projects; preventing the conversion of forests to development; and the conservation of forest resources.

For all these reasons, I urge the Air Resources Board to uphold the vision and initial intentions of the forest carbon program and AB 32, by amending the forest protocol to protect forest ecosystems and resources.

1) First and foremost, do not include forest clearcutting as part of the California's cap-and-trade offset program.

2) In addition, the forest protocol should not be part of the proposed cap-and-trade rule unless, at the minimum, the following critical amendments are adopted:

a. A Forest Project may not include conversion of native forest stands comprised of multiple ages or mixed native species to even-age or monoculture management, and may not include even-age management of any stand that had been converted to even-age or monoculture management in the harvest cycle preceding the registration of the Forest Project.

b. Forest carbon offset projects must account for changes in down and dead wood and soil carbon pools.
Forest Projects that include timber harvesting are required to account for changes in the following forest carbon pools: lying dead wood, and soil carbon.

Healthy forests are a critical component of California's environment, economy, and quality of life, providing jobs and recreational opportunities, wildlife habitat, clean air and clean water. Healthy and resilient forests are also an important component of California's effort to reduce statewide greenhouse gas emissions, and ARB should consider only programs that can both reliably assure the value of carbon offset projects and protect forest from additional environmental risks.

The failure to fully account for the carbon consequences of harvest practices poses risks to the integrity of the entire program and increases the potential for unintended impacts to our forests.

I urge you to make these crucial amendments in order to ensure that California's cap-and-trade rule does not subsidize environmentally damaging forest management activities or the conversion of natural forests into tree farms.

Sincerely,

Nury Enciso
2709 6th Avenue
Sacramento, CA 95818
916-473-7355

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-02 08:46:37

Form Letter 2 for Comment 119 for California Cap-and-Trade Program (capandtrade10) - 45 Day.

First Name: Roy
Last Name: Bozarth
Email Address: dbozarth@sbcglobal.net
Affiliation:

Subject: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting
Comment:

December 1, 2010

The Honorable Mary Nichols, Chair
California Air Resources Board

RE: The First Carbon Offset Program Should Not Encourage Forest Clearcutting
Dear Ms. Nichols and members of the California Air Resources Board,

We are writing to you today to urge the California Air Resources Board (ARB) to amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program, in order to protect forests and the wildlife that rely on them. We implore you not to make forest clearcutting the face of AB 32. California cannot and should not try to clearcut our way out of climate change.

ARB's proposed cap-and-trade rule currently not only explicitly invites forest clearcutting as a carbon offset project, but also incentivizes the conversion of natural forests into tree farms. This is no solution to climate change, and further threatens forest ecosystems and wildlife already at risk from global warming.

Forest clearcutting and the conversion of native forests to tree plantations pose great risk to the climate, while simultaneously degrading forest ecosystems, water quality, and wildlife habitat, and impairing the forest's resilience to the impacts of climate change.

In its current form, the forest protocol lacks credibility because it would subsidize the most intensive and environmentally risky timber operations in order to provide carbon offsets that would allow power plants, oil refineries, and industrial polluters to avoid upgrading their facilities to adopt less polluting technologies. At the same time, the forest protocol fails to account for greenhouse gas emissions associated with logging slash and debris, dead trees, roots and soil, all of which are much greater for forest clearcutting than for native forest management. This is no gold standard.

Not all offsets are created equal. ARB should consider only programs that can reliably assure carbon sequestration and avoid those that introduce additional environmental risks. We can not clearcut our way out of climate change. Rather than promoting the

conversion of native forests to a patchwork of 40 acre clearcuts, California should use this opportunity to incentivize the best kinds and “green” forms of forest management, which can benefit both the climate and the forest.

The forest protocol offers many other options that meet these criteria: reforestation projects; preventing the conversion of forests to development; and the conservation of forest resources.

For all these reasons, we urge the Air Resources Board to uphold the vision and initial intentions of the forest carbon program and AB 32, by amending the forest protocol to protect forest ecosystems and resources.

1) First and foremost, do not include forest clearcutting as part of the California’s cap-and-trade offset program.

2) In addition, the forest protocol should not be part of the proposed cap-and-trade rule unless, at the minimum, the following critical amendments are adopted:

a. A Forest Project may not include conversion of native forest stands comprised of multiple ages or mixed native species to even-age or monoculture management, and may not include even-age management of any stand that had been converted to even-age or monoculture management in the harvest cycle preceding the registration of the Forest Project.

b. Forest carbon offset projects must account for changes in down and dead wood and soil carbon pools.
Forest Projects that include timber harvesting are required to account for changes in the following forest carbon pools: lying dead wood, and soil carbon.

Healthy forests are a critical component of California’s environment, economy, and quality of life, providing jobs and recreational opportunities, wildlife habitat, clean air and clean water. Healthy and resilient forests are also an important component of California’s effort to reduce statewide greenhouse gas emissions, and ARB should consider only programs that can both reliably assure the value of carbon offset projects and protect forest from additional environmental risks.

The failure to fully account for the carbon consequences of harvest practices poses risks to the integrity of the entire program and increases the potential for unintended impacts to our forests.

We urge you to make these crucial amendments in order to ensure that California’s cap-and-trade rule does not subsidize environmentally damaging forest management activities or the conversion of natural forests into tree farms.
Thank you.

Sincerely,

Roy & Diane Bozarth

Modesto, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-02 08:47:53

Form Letter 3 for Comment 119 for California Cap-and-Trade Program (capandtrade10) - 45 Day.

First Name: Katrina
Last Name: Maczen-Cantrell
Email Address: kcantrell@telis.org
Affiliation:

Subject: clearcutting --proposed cap and trade
Comment:

The Honorable Mary Nichols, Chair
California Air Resources Board

RE: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting
Dear Ms. Nichols and members of the California Air Resources Board:

As an enrolled member of the Western Shoshone Nation, and a grandmother of six Pit River enrolled tribal members, I am appalled at the wholesale destruction of forest, water and natural resources that is being perpetuated by forest clearcutting. In addition, I am deeply sickened by the lack of respect for sacred and cultural significant sites, within the ancestral tradition boundaries of the Pit River Nation.
Forest clearcutting and the conversion of native forests to tree plantations remove and restrict spiritual healing, prayer, and song that is needed by all peoples. Although not hemmed in by bricks, stone and mortar like dominant societies places of worship, Mother Earth is by design is being ignored and abused through the violent act of clearcutting.
I am writing to urge the California Air Resources Board (ARB) to amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program, in order to protect forests and the wildlife that rely on them. I implore you not to make forest clearcutting the face of AB 32. California cannot and should not try to clearcut our way out of climate change.

ARB's proposed cap-and-trade rule currently not only explicitly invites forest clearcutting as a carbon offset project, but also incentivizes the conversion of natural forests into tree farms. This is no solution to climate change, and further threatens forest ecosystems and wildlife already at risk from global warming.

Forest clearcutting and the conversion of native forests to tree plantations pose great risk to the climate, while simultaneously degrading forest ecosystems, water quality, and wildlife habitat, and impairing the forest's resilience to the impacts of climate change.

In its current form, the forest protocol lacks credibility because it would subsidize the most intensive and environmentally risky timber operations in order to provide carbon offsets that would allow power plants, oil refineries, and industrial polluters to avoid upgrading their facilities to adopt less polluting

technologies. At the same time, the forest protocol fails to account for greenhouse gas emissions associated with logging slash and debris, dead trees, roots and soil, all of which are much greater for forest clearcutting than for native forest management. This is no gold standard.

Not all offsets are created equal. ARB should consider only programs that can reliably assure carbon sequestration and avoid those that introduce additional environmental risks. We can not clearcut our way out of climate change. Rather than promoting the conversion of native forests to a patchwork of 40 acre clearcuts, California should use this opportunity to incentivize the best kinds and “green” forms of forest management, which can benefit both the climate and the forest.

The forest protocol offers many other options that meet these criteria: reforestation projects; preventing the conversion of forests to development; and the conservation of forest resources.

For all these reasons, I urge the Air Resources Board to uphold the vision and initial intentions of the forest carbon program and AB 32, by amending the forest protocol to protect forest ecosystems and resources.

1) First and foremost, do not include forest clearcutting as part of the California’s cap-and-trade offset program.

2) In addition, the forest protocol should not be part of the proposed cap-and-trade rule unless, at the minimum, the following critical amendments are adopted:

a. A Forest Project may not include conversion of native forest stands comprised of multiple ages or mixed native species to even-age or monoculture management, and may not include even-age management of any stand that had been converted to even-age or monoculture management in the harvest cycle preceding the registration of the Forest Project.

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Forest Projects that include timber harvesting are required to account for changes in the following forest carbon pools: lying dead wood, and soil carbon.

Healthy forests are a critical component of California’s environment, economy, and quality of life, providing jobs and recreational opportunities, wildlife habitat, clean air and clean water. Healthy and resilient forests are also an important component of California’s effort to reduce statewide greenhouse gas emissions, and ARB should consider only programs that can both reliably assure the value of carbon offset projects and protect forest from additional environmental risks.

The failure to fully account for the carbon consequences of harvest practices poses risks to the integrity of the entire program and increases the potential for unintended impacts to our forests.

I urge you to make these crucial amendments in order to ensure that California’s cap-and-trade rule does not subsidize environmentally damaging forest management activities or the conversion of natural forests into tree farms.

Sincerely,
Katrina Maczen-Cantrell
PO BOX 254
 Round Mountain, CA 96084
kcantrell@telis.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-06 14:15:38

Form Letter 4 for Comment 119 for California Cap-and-Trade Program (capandtrade10) - 45 Day.

First Name: Rene
Last Name: Harp
Email Address: renejh1@juno.com
Affiliation:

Subject: RE: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting
Comment:

Dec 6, 2010

California Air Resources Board members
1001 I Street
Sacramento, CA 95814

Dear Air Resources Board members,

I urge you to approve California's landmark greenhouse gas cap-and-trade program with two improvements, and to continue California's march toward a clean energy future. The program is a key piece of the Global Warming Solutions Act (AB 32), providing an essential backstop to ensure we achieve our pollution reduction goals.
More than that, approving the program constitutes a critical step in building a clean energy economy here in California.

The one bright spot in California's struggling economy has been clean energy. Passing the Global Warming Solutions Act sent a signal to the world that California is committed to clean energy and will develop the policy infrastructure necessary to achieve our clean energy goals. Today, California attracts more clean-tech investment and clean energy businesses and jobs than the rest of the nation combined.

Approving the cap-and-trade program will drive innovation and investment in the low carbon technologies and services that will be essential in meeting our future energy needs. Those investments will put Californians back to work making our homes and businesses more energy efficient, building and operating new sources of renewable energy, and revamping our means of transportation.

I urge you to make two improvements to the program before approving it:
1. Tighten the regulation language to ensure that auction revenue in the electricity sector is used for cost-effective energy

efficiency
programs that will reduce emissions while also reducing
Californians'
energy bills;
2. Change the industrial sector benchmark to an industry "best
practices" level rather than an industry average performance level
in order to incentivize industrial emitters to achieve "best
practices" in their industry and become more efficient.

I urge you to continue California's historic leadership on clean
energy
so we can remain at the forefront of the sector that will drive
the
21st century economy.

Sincerely,

Mr. Rene Harp
507 N Maple Ave
Maple Shade, NJ 08052-1124

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-07 12:52:34

Form Letter 5 for Comment 119 for California Cap-and-Trade Program (capandtrade10) - 45 Day.

First Name: Barbara
Last Name: Abbott
Email Address: bellareiki@sbcglobal.net
Affiliation:

Subject: RE: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting
Comment:

The Honorable Mary Nichols, Chair
California Air Resources Board

RE: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting
Dear Ms. Nichols and members of the California Air Resources Board:

I am writing to urge the California Air Resources Board (ARB) to amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program, in order to protect forests and the wildlife that rely on them. I implore you not to make forest clearcutting the face of AB 32. California cannot and should not try to clearcut our way out of climate change.

ARB's proposed cap-and-trade rule currently not only explicitly invites forest clearcutting as a carbon offset project, but also incentivizes the conversion of natural forests into tree farms. This is no solution to climate change, and further threatens forest ecosystems and wildlife already at risk from global warming.

Forest clearcutting and the conversion of native forests to tree plantations pose great risk to the climate, while simultaneously degrading forest ecosystems, water quality, and wildlife habitat, and impairing the forest's resilience to the impacts of climate change.

In its current form, the forest protocol lacks credibility because it would subsidize the most intensive and environmentally risky timber operations in order to provide carbon offsets that would allow power plants, oil refineries, and industrial polluters to avoid upgrading their facilities to adopt less polluting technologies. At the same time, the forest protocol fails to account for greenhouse gas emissions associated with logging slash and debris, dead trees, roots and soil, all of which are much greater for forest clearcutting than for native forest management. This is no gold standard.

Not all offsets are created equal. ARB should consider only programs that can reliably assure carbon sequestration and avoid those that introduce additional environmental risks. We can not clearcut our way out of climate change. Rather than promoting the conversion of native forests to a patchwork of 40 acre clearcuts, California should use this opportunity to incentivize the best kinds and "green" forms of forest management, which can benefit

both the climate and the forest.

The forest protocol offers many other options that meet these criteria: reforestation projects; preventing the conversion of forests to development; and the conservation of forest resources.

For all these reasons, I urge the Air Resources Board to uphold the vision and initial intentions of the forest carbon program and AB 32, by amending the forest protocol to protect forest ecosystems and resources.

1) First and foremost, do not include forest clearcutting as part of the California’s cap-and-trade offset program.

2) In addition, the forest protocol should not be part of the proposed cap-and-trade rule unless, at the minimum, the following critical amendments are adopted:

a. A Forest Project may not include conversion of native forest stands comprised of multiple ages or mixed native species to even-age or monoculture management, and may not include even-age management of any stand that had been converted to even-age or monoculture management in the harvest cycle preceding the registration of the Forest Project.

b. Forest carbon offset projects must account for changes in down and dead wood and soil carbon pools.
Forest Projects that include timber harvesting are required to account for changes in the following forest carbon pools: lying dead wood, and soil carbon.

Healthy forests are a critical component of California’s environment, economy, and quality of life, providing jobs and recreational opportunities, wildlife habitat, clean air and clean water. Healthy and resilient forests are also an important component of California’s effort to reduce statewide greenhouse gas emissions, and ARB should consider only programs that can both reliably assure the value of carbon offset projects and protect forest from additional environmental risks.

The failure to fully account for the carbon consequences of harvest practices poses risks to the integrity of the entire program and increases the potential for unintended impacts to our forests.

I urge you to make these crucial amendments in order to ensure that California’s cap-and-trade rule does not subsidize environmentally damaging forest management activities or the conversion of natural forests into tree farms.

Sincerely,

Barbara G Abbott

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-07 12:52:34

Form Letter 6 for Comment 119 for California Cap-and-Trade Program (capandtrade10) - 45 Day.

First Name: Katrina
Last Name: Maczen-Cantrell
Email Address: kcantrell@telis.org
Affiliation:

Subject: RE: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting
Comment:

The Honorable Mary Nichols, Chair
California Air Resources Board

RE: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting
Dear Ms. Nichols and members of the California Air Resources Board:

As an enrolled member of the Western Shoshone Nation and a grandmother of six Pit River enrolled tribal members, I am appalled at the wholesale destruction of forest, water and natural resources that is being perpetuated by forest clearcutting. In addition, I am deeply sickened by the lack of respect for sacred and cultural significant sites, within the ancestral tradition boundaries of the Pit River Nation.
Forest clearcutting and the conversion of native forests to tree plantations remove and restrict spiritual healing, prayer, and song that is needed by all peoples. Although not hemmed in by bricks, stone and mortar like dominant societies places of worship, Mother Earth is by design is being ignored and abused through the violent act of clearcutting.
I am writing to urge the California Air Resources Board (ARB) to amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program, in order to protect forests and the wildlife that rely on them. I implore you not to make forest clearcutting the face of AB 32. California cannot and should not try to clearcut our way out of climate change.

ARB's proposed cap-and-trade rule currently not only explicitly invites forest clearcutting as a carbon offset project, but also incentivizes the conversion of natural forests into tree farms. This is no solution to climate change, and further threatens forest ecosystems and wildlife already at risk from global warming.

Forest clearcutting and the conversion of native forests to tree plantations pose great risk to the climate, while simultaneously degrading forest ecosystems, water quality, and wildlife habitat, and impairing the forest's resilience to the impacts of climate change.

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technologies. At the same time, the forest protocol fails to account for greenhouse gas emissions associated with logging slash and debris, dead trees, roots and soil, all of which are much greater for forest clearcutting than for native forest management. This is no gold standard.

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For all these reasons, I urge the Air Resources Board to uphold the vision and initial intentions of the forest carbon program and AB 32, by amending the forest protocol to protect forest ecosystems and resources.

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The failure to fully account for the carbon consequences of harvest practices poses risks to the integrity of the entire program and increases the potential for unintended impacts to our forests.

I urge you to make these crucial amendments in order to ensure that California’s cap-and-trade rule does not subsidize environmentally damaging forest management activities or the conversion of natural forests into tree farms.

Sincerely,
Katrina Maczen-Cantrell
PO BOX 254
 Round Mountain, CA 96084
kcantrell@telis.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-07 14:36:49

Form Letter 7 for Comment 119 for California Cap-and-Trade Program (capandtrade10) - 45 Day.

First Name: Brian
Last Name: Nowicki
Email Address: bnowicki@biologicaldiversity.org
Affiliation:

Subject: 45 NGOs: Forest Carbon Offset Program Should Not Include Forest Clearcutting
Comment:

On behalf of the undersigned conservation organizations, we are writing to urge the California Air Resources Board (ARB) to amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program, in order to protect forests and the wildlife that rely on them. We implore you not to make forest clearcutting the face of AB 32. We cannot and should not try to clearcut our way out of climate change.

Please see attached letter.

Battle Creek Alliance; Butte Environmental Council; California Native Plant Society; Californians Against Toxics; Cascade Action Now!; Center for Biological Diversity; Central Coast Forest Watch; Central Sierra Audubon Society; Central Sierra Environmental Resource Center; Center for Sierra Nevada Conservation; Citizens for Better Forestry; Conservation Congress; Defenders of Wildlife; Ebbetts Pass Forest Watch; Environment Now; Environmental Protection Information Center; Foothills Conservancy; Forest Ethics; Forests Forever; Forest Issues Group; Forest Unlimited; Friends of Lassen Forest;
Friends of the Earth; Friends of the Eel River; Geoengineering Watch; Greenpeace; John Muir Project; Klamath Forest Alliance; Lassen Forest Preservation Group; Los Padres ForestWatch; Mountain Alliance; Mountain Meadows Conservancy; Northcoast Environment Center; Northern California Fly Fishers; Northern California River Watch; Planning and Conservation League; Rainforest Action Network; Religious Campaign for Forest Conservation; Sequoia ForestKeeper; Sierra Club California; Sierra Forest Legacy; Sierra Nevada Alliance; Sierra People's Forest Service; Siskiyou Land Conservancy; StopClearcuttingCalifornia; Upper Mokelumne River Watershed Council; World Stewardship Institute

Attachment: www.arb.ca.gov/lists/capandtrade10/249-group_letter_to_arb_re_v_forest_protocol_120910__w_sigs_.pdf

Original File Name: Group letter to ARB re v forest protocol 120910 (w sigs).pdf

Date and Time Comment Was Submitted: 2010-12-09 12:24:08

Form Letter 8 for Comment 119 for California Cap-and-Trade Program (capandtrade10) - 45 Day.

First Name: Coral
Last Name: Brune
Email Address: coralbrune@hotmail.com
Affiliation: FRSC 101.1FM

Subject: Cap and Trade
Comment:

The Honorable Mary Nichols, Chair
California Air Resources Board

RE: The Forest Carbon Offset Program Should Not Encourage Forest Clearcutting

Dear Ms. Nichols and members of the California Air Resources Board:

I am writing to urge the California Air Resources Board (ARB) to amend the proposed cap-and-trade rule to exclude forest clearcutting from the carbon offset program, in order to protect forests and the wildlife that rely on them. I implore you not to make forest clearcutting the face of AB 32. California cannot and should not try to clearcut our way out of climate change.

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Forest clearcutting and the conversion of native forests to tree plantations pose great risk to the climate, while simultaneously degrading forest ecosystems, water quality, and wildlife habitat, and impairing the forest's resilience to the impacts of climate change.

In its current form, the forest protocol lacks credibility because it would subsidize the most intensive and environmentally risky timber operations in order to provide carbon offsets that would allow power plants, oil refineries, and industrial polluters to avoid upgrading their facilities to adopt less polluting technologies. At the same time, the forest protocol fails to account for greenhouse gas emissions associated with logging slash and debris, dead trees, roots and soil, all of which are much greater for forest clearcutting than for native forest management. This is no gold standard.

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For all these reasons, I urge the Air Resources Board to uphold the vision and initial intentions of the forest carbon program and AB 32, by amending the forest protocol to protect forest ecosystems and resources.

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The failure to fully account for the carbon consequences of harvest practices poses risks to the integrity of the entire program and increases the potential for unintended impacts to our forests.

I urge you to make these crucial amendments in order to ensure that California’s cap-and-trade rule does not subsidize environmentally damaging forest management activities or the conversion of natural forests into tree farms.

Sincerely,

Coral Brune
Free the Land Radio show

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-12-14 07:03:51