



Central Coast Forest Watch

[Yolo Clean Air](#)

April 1, 2014

Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Linda Adams, Chair
Climate Action Reserve (CAR)
601 W. 5th Street, Suite 650
Los Angeles, CA 90071

Dear Madam Chairs:

We are writing you to respectfully urge that the Air Resources Board and Reserve immediately launch an effort to correct a major flaw in how forests are treated under the existing California cap and trade system pursuant to AB 32.

This January, the journal *Nature* published a study validating the importance of old-growth forests to climate change mitigation. The study found that large, old trees actively fix large amounts of carbon as compared to smaller trees. "At the extreme, a single big tree can add the same amount of carbon to the forest within a year as is contained in an entire mid-sized tree." (*Rate of tree carbon accumulation increases continuously with tree size*", Nature.com, 1/15/14).

Unfortunately, when the ARB adopted CAR's Forest Protocol in December 2010 as part of the approval of Cap and Trade, it included some amendments that explicitly allow timberland owners to market carbon credits from forest activities involving "even-aged" management – more commonly known as clearcutting. This allows timber companies like Sierra Pacific Industries, which promoted these provisions, to clearcut its forestlands, including remnant tracts of old-growth forest, and then be awarded carbon credits from replanting the sites with even-age, nearly monoculture tree plantations. Ignoring objections and calls from nongovernmental organizations like Sierra Club California, Center for Biological Diversity, and others to remove or modify these provisions, the Air Resources Board rubber-stamped the Forest Protocol and

incorporated it intact as an integral part of the ARB's cap and trade rules. We believe these actions by CAR and ARB were misguided policy decisions, and should be reconsidered in light of the new scientific findings.

In our view, the flawed Forest Protocol undermines the credibility of California's cap and trade system by incentivizing the destruction of old-growth forests in the state and in North America.

Plantations are not forests. Given the recent findings about forests and older trees, we urge that ARB and CAR adopt an immediate moratorium on registration of carbon credits from forest projects that entail clearcutting. Secondly, we urge that you launch an expedited effort to amend the 2010 Forest Protocol to permanently disallow projects that reward landowners for destroying existing stands of intact or remnant old-growth forest and replacing them with even-aged, monoculture tree plantations. We also respectfully request that ARB initiate no formal rulemaking on California REDD, which involves forest offset credits for international projects in countries such as Mexico, Brazil, and Nigeria, until these more pressing domestic matters are addressed.

Respectfully,

Sierra Club
Juliette Beck

Ebbets Pass Forest Watch
John Trinkl

Friends of the Earth
Jeff Conant

Forests Forever
Paul Hughes

Environmental Protection Information Center
Rob DiPerna

Food & Water Watch
Adam Scow

Global Justice Ecology Project
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