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**Ebbetts Pass Forest Watch (EPFW) Comments on Climate Change Action Reserve Final Draft Forest Protocols (April 15, 2009)**

**Ebbetts Pass Forest Watch appreciates the opportunity to comment on the Climate Change Action Reserve Final Draft. EPFW is a small grass roots organization located in Arnold, CA.** EPFW is devoted to protecting healthy forests and watersheds. In our county there are approximately 150,000 acres of forestland. Approximately one half of this is US Forest Service and most of the other half is privately owned. Approximately 2/3 of most of the private forest land in our county is going to be or has been clearcut or otherwise converted from bio diverse forestland into evenaged tree plantations. In these plantations the silviculture methods purposefully strive to eliminate native plants and non-commercial trees such as oaks to eliminate competition for the planted tree species and to ease mechanical processing during the next clearcut.

**While there are principles of the document we can support, we have concerns about some of the new language:**

- Section 3 describes the criteria that must be met for a forest project to be eligible for reporting and verification in the Reserve. The most recent draft dramatically includes new definitions that would expand the definition of natural forest management to include a much broader range of management activities and harvest scenarios, potentially including clearcut logging. Also, this draft eliminated criteria previously intended to ensure the ecological value of the forest projects.
- Section 3 includes the following new definition of natural forest management: "Forest projects, and their associated forest entity, must demonstrate environmentally responsible long-term forest management under one of the following options: 1. If and when commercial harvesting occurs in the project area, certification under a nationally-recognized third-party forest management certification program in which the certification standards require adherence to and verification of harvest levels which can be permanently sustained over time. If and when commercial harvesting occurs, operating under a renewable long-term management plan that demonstrates harvest levels which can be permanently sustained over time and that is sanctioned and monitored by a state or federal agency. 2. For entities of 1000 acres or less, operating with uneven aged silvicultural practices and canopy retention averaging ? 40% across the forest."

This definition can apply to almost any method of harvest under almost any management scenario.

Any timber operator with a long-term management plan and operating under a certification system would therefore qualify as natural forest management. This potentially includes clearcut logging, the application of chemical herbicides and fertilizers, and harvest rotations as short as 50 years. Presumably, the additional requirements elsewhere in the protocols provide additional safeguards for ecological values, but this definition of natural forest management accomplishes very little, if anything.

- Section 3.5.1 includes the new requirement: "Conformance with this [natural forest management] requirement can be evaluated on as small a project as a harvest unit, of less than 40 acres, or a project encompassing a watershed spatial scale up to a maximum of 10,000 acres. If a project encompasses several or many watersheds, then the natural forest management requirement must be met for every 10,000 acres. (bold added)" It is not clear from this new definition whether conformance with the natural forest management requirement at the watershed (10,000 acre) scale allows a project to not conform with the natural forest management standards at the site level.
- Section 3.5.1 excludes the requirement, present in the previous draft: "Maintain hydrologic patterns and functions to support functional habitat for endemic plant and wildlife species."
- Section 3.5.1 removes the requirement that "Projects that do not initially meet the natural forest management requirement must do so prior to being able to verify reductions," and replaces it with "Projects that do not meet the natural forest management criteria but demonstrate that management will make progress towards and meet these criteria during the project's life are eligible to register credits on the Reserve."
- Section 3.5.1 excludes the requirement, present in the previous draft: "All projects must use the evaluation criteria for Improved Forest Management whenever commercial harvested is incorporated into the project management. Projects that do not promote and maintain native trees or do not practice Natural Forest Management are not eligible for registration with the Reserve."
- Table 3.1 eliminates evaluation criteria for "functional habitat elements for endemic plants and wildlife," and "sensitive areas on forests," present in the previous draft. In addition, specific requirements for maintaining snags and large woody debris were replaced with the requirement that "Project carbon in standing dead wood will not be actively reduced."

**The provisions in the sections cited above could inadvertently reward “business as usual” in California’s forests by supporting the notion that plantations are “natural forests” and that the clearcutting and related methods are “good” for wildlife and forest health. We are concerned that the language in this draft could be used to endorse continued widespread clearcutting and conversion of forests to plantations as natural and “environmentally responsible.”**

**For the record, the practices endorsed by the current draft language noted above include:**

- Widespread use of herbicides as to prevent re-growth of natural vegetation that is critical to prevent soil erosion and to wildlife habitat.
- Clearcutting most oaks and elimination of most snags (a few are left in narrow water protection

zones and a few token trees/snags are left in some clearcuts).

- Conversion of entire watersheds and biologic assessment areas into evenaged tree plantations with limited native non commercial species remaining such as hardwoods or decadent wildlife habitat
- Limited protection of biodiversity and habitat during harvest. Currently diverse habitat retention in clearcutting is generally restricted to Watercourse and Lake Protection Zones (WLPZ). Currently in CA Forest Practice Act allow for generally only 50-100 feet from center stream and only provide for only limited protection of resources in this zone so the actual habitat maintained is quite limited.



The photographs above show a typical clearcut, small planted plantation trees with evidence of herbicide damage to other vegetation, and an evenaged plantation approximately 30 years old with limited biodiversity.

Our earth needs fewer CO<sub>2</sub> emissions ASAP and maximum sequestration ASAP s to avoid the tipping point in climate change. We need protocols that will not be gamed to support business as usual.

Thank you for the opportunity to comment on these important protocols.

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