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Subject: Comments on Final Draft Forest Project Protocol Version 3.0

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ForestEthics appreciates the opportunity to submit comments on this Final Draft Forest Project Protocols. ForestEthics advocates for environmentally sound logging practices in California that maintain functioning ecosystems and habitat. While there are principles of the proposal we can certainly endorse, we have concerns about some of the language around Section 3.5, "Use of Native Species and Natural Forest Management Practices."

This section rightly states that forest projects should provide environmental co-benefits along with sequestering carbon. The protocols require participating forests engage in "environmentally responsible" long-term management and must utilize "natural forest management." However, these terms seem inappropriate given the requirement for participation.

For example, the first two criteria for sustainable management essentially state that so long as the forest operates under a certification system and has a long-term management plan, they are engaged in environmentally responsible and natural management. Following one of those criteria may produce consistent amounts of timber, but it does not necessarily make for environmentally responsible or natural forest management.

For example, under the Sustainable Forestry Initiative (SFI), timber companies anywhere in North America (unless restricted by state rules) can produce clearcuts averaging 120-acre average size, regardless of whether it mimics the local natural processes. They can then spray chemicals, which may contain ingredients completely foreign to the local ecosystems, killing natural shrub regrowth. Trees may also be harvested on a rotation of as little as 50 years. It is possible that there are forests in North America where processes such as these could be found, but they would be the exception rather than the rule. Yet, under these guidelines, if a forest under the SFI system could demonstrate it was sequestering enough carbon to meet CCAR's guidelines, it could also claim it was engaged in "natural" and "environmentally responsible" forestry.

Also, oddly enough, if a landowner was engaged in the kind of intensive forestry described above under the SFI, but was doing it on less than 1,000 acres, they would not be allowed to take part in the CCAR protocol. The current rules require landowners under 1,000 acres to engage in unevenagd management while retaining 40% canopy cover, rules more restrictive than under the SFI. While we understand this rule allows smaller landowners to take part in CCAR without having to deal with the costs associated with certification, one would assume this rule also exists to prevent small landowners from engaging in destructive management. This means CCAR is actually endorsing what natural forest management is and is not, otherwise the same rules that apply to large landowners would apply to small landowners. However, under the current rules, CCAR is now saying destructive management is only allowed if one is a large landowner, and thus, is able to magnify these damaging practices over a larger area.

We would suggest removing the term “natural” and “environmentally responsible” altogether from the criteria. Instead, since the criteria seems to more or less include most timber operators in North America, call it “standard forest management,” or if CCAR wants to limit it to California’s standards, state that as well. Given this is really about whether the forests are storing carbon or not (though clearly more natural forests, particularly old-growth, are the best carbon sequesters we have), the terms “natural” and “environmentally responsible” are both unnecessary and inconsistently used in the proposed standards.

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

Sincerely,

Joshua Buswell
Sierra Campaigner, ForestEthics