

# Oaks

## California Oak Foundation

*Our mission is to protect and perpetuate native oak woodlands*

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December 4, 2007

Draft Oak Woodland Management Plan Comments  
Attn: Monique Wilber  
2850 Fairlane Court  
Placerville CA 95667

Re: Oak Woodlands & Air Quality

Dear Ms. Wilber:

The California Oak Foundation (COF) appreciates the opportunity to comment on the draft Oak Woodland Management Plan (OWMP). COF comments regard the California forest protocols and their relationship to the OWMP.

The California forest protocols were adopted by the California Climate Action Registry in 2005, incorporated into Assembly Bill 32 in 2006 and approved by the California Air Resources Board (CARB) on October 25, 2007. These forest protocols recognize that converting native forests and woodlands to development is a carbon dioxide "biological emission," due to lost photosynthesis and other CO<sub>2</sub> releases. CARB's next step is to formulate and institute by January 1, 2010 the "discrete" early action oak woodlands regulatory system.

The CARB forest protocols focus on counting the capture or emission of CO<sub>2</sub> by forest "biomass." While the protocols don't yet provide default equations for oak woodland biological emissions, they do prescribe that at a minimum CO<sub>2</sub> emissions include impacts to live tree biomass (including roots), standing dead tree biomass and wood lying on the ground.

In the opinion of COF, CEQA oak woodland biological reviews must analyze both wildlife habitat impacts and carbon emission impacts when determining significant impacts and proportional mitigation measures. CEQA air quality questions to be answered include: (1) how much potential carbon sequestration will be lost due to impacts to tree biomass, standing dead biomass and woody debris; (2) how much captured CO<sub>2</sub> will be released if the impacted oaks are burned?

COF is not alone in its perspective that California's passage of AB 32 means that climate change is a potential environmental impact that needs to be addressed immediately in CEQA reviews. California Attorney General Brown has made it clear to cities and counties that discretionary approvals must provide: (1) an examination of a project's impact on climate change and the adoption of all feasible mitigation measures to reduce such impacts; (2) such analysis can - and must - be done today even absent established thresholds of significance or impending regulations under AB 32.

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In September, Brown reached a \$10 million CEQA settlement with ConocoPhillips regarding mitigation offsets for increased refinery greenhouse gas emissions that included \$2.8 million for reforestation projects to sequester CO<sub>2</sub>. If the California Attorney General is requiring CEQA reforestation mitigation for smokestack carbon emissions, then CO<sub>2</sub> emissions from the conversion of oak woodlands certainly merit CEQA analysis and conservation/reforestation mitigation.

For his part, Gov. Schwarzenegger not only signed AB 32 into law, the Governor and his wife have directly endorsed the forest protocols by pledging their own funds to purchase forest carbon credit offsets for all personal and official jet travel. Assembly Speaker Nunez, House Speaker Pelosi and Secretary Linda Adams of the California Environmental Protection Agency have similarly supported the protocols.

Recommendation

California Oak Foundation suggests that El Dorado County adopt the following modifications to make local planning policies consistent with the CARB forest protocols:

1. Amend General Plan Objective 7.4.4 Forest and Oak Woodland Resources by adding the term "air quality."

"Protect and conserve forest and woodland resources for their wildlife habitat, air quality, recreation, water production, domestic livestock grazing, production of a sustainable flow of wood products, and aesthetic values."

2. Stipulate in the OWMP that any CO<sub>2</sub> biological emissions mitigation resulting from the development of oak woodland resources shall be used solely for the purpose of purchasing conservation easements located in the designated Important Biological Corridors. Priority shall be given to the acquisition of Important Biological Corridor conservation easements within the designated Community Region.

Sincerely,

Janet S. Cobb, President  
California Oak Foundation

**Forest Protocol Key Terms**

*Biological emissions:* For the purposes of the forest protocol, biological emissions are GHG emissions that are released directly from forest biomass, both live and dead, including forest soils.

*Biomass:* The total mass of living organisms in a given area or volume; recently dead plant material is often included as dead biomass.

*Bole:* A trunk or main stem of a tree. For the purposes of the Protocol, any tree bole with a minimum diameter of three inches should be included in the inventory to estimate carbon stocks.

*Carbon pool:* A reservoir that has the ability to accumulate and store carbon or release carbon. In the case of forests, a carbon pool is the forest biomass, which can be subdivided into smaller pools. These pools may include aboveground or below-ground biomass or roots, litter, soil, bole, branches and leaves, among others.