

Oaks

California Oak Foundation

Our mission is to protect and perpetuate native oak woodlands

July 15, 2009

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Christopher Calfee, Special Counsel
ATTN: CEQA Guidelines
California Resources Agency
1017 L Street, #2223
Sacramento, CA 95814
CEQA.Rulemaking@resources.ca.gov

Re: Proposed Guideline Amendments

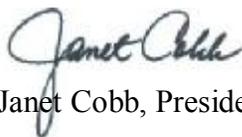
Dear Mr. Calfee:

The California Oak Foundation (COF) appreciates the opportunity to comment on the proposed California Environmental Quality Act (CEQA) Guideline amendments and our organization writes in full support of the current Initial Study checklist native forest guidance. These forestry amendments will elicit the oak woodlands information necessary for informed public participation and informed decision making regarding carbon biological emission impacts and proportional mitigation measures.

The Resources Agency approach to oak woodland carbon biological emissions analysis mirrors Oak Foundation recommendations to the California Air Resources Board (CARB) and Governor's Office of Planning and Research. Essentially CEQA must: (1) alert local jurisdictions that there are carbon dioxide emission effects to be considered when native forests are converted to a non-forest land use; (2) identify the CARB Forest Protocols measurement methodology as the state-sanctioned standard for forest carbon analysis. As a practical matter, there is not now nor likely to be a CEQA forest carbon measurement alternative to the California grown forest protocols methodology.

Governor Arnold Schwarzenegger and his administration are to be commended for placing a premium on conserving California's native forests by specifically recognizing the unique capacity of existing native trees to naturally sequester large quantities of CO₂ over time and the adverse public health effects of discharging that stored carbon back into the atmosphere when forests are unnaturally impacted. A living legacy for future generations will result from this astute decision.

Respectfully,



Janet Cobb, President