

Comment 1 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Philip

Last Name: Sanchez

Email Address: philiphermansanchez@hotmail.com

Affiliation:

Subject: GLOBAL WARMING IS A SCAM!!!

Comment:

For years now, we have been told that science is dedicatedly attempting to find out how the Earth's Climate works. With all possible seriousness, the most publically vocal of these scientists, those working for the UN's IPCC (Intergovernmental Panel on Climate Change), have for the last several years blamed the warming they "found" on Carbon Dioxide. With the release of the CRU (Climatic Research Unit, University of East Anglia) email database, it is very clearly apparent that the scientists involved with the IPCC were doctoring data to give a specific result. That result was designed to look as if CO₂ was causing climate change, warming the earth due to Human activities. It can be reported now that this theory has been solidly disproven by Dr. Ferenc Miskolczi and Dr. Miskolczi's work will make history.

Constants

To give context to this discovery, a short lesson in science is needed. The term "Constant" is very well known in science. Simply put it is a part of an equation (An equation is merely a mathematical sentence, the Variables are the words) that does not change; they are specific and represent solid concepts. You may have heard of Bohr's Constant, Hubble's Constant, Avogadro's Constant, there are many of them. There is a new Constant; one that has not been named, but if history is any guide it will be called the Miskolczi Constant, named for the physicist who discovered it. A Constant we are all familiar with is the speed of light. Before Einstein and his famous theory of Relativity $E=MC^2$, it was widely believed there was no limit on speed, just throw a rock from a speeding train and the speed will continue to add up. Einstein and his theory of Special Relativity put a specific limit on speed - the speed of light, beyond which nothing could go. There is a strict energetic limit, and we have recognized that for decades now. Before Miskolczi, it was generally thought that the greenhouse effect could be increased infinitely by adding more and more CO₂ molecules into the air. Under the conditions prevailing on Earth, Miskolczi has proved that there is a limit to the greenhouse temperature that cannot be raised. Why is that? The IPCC has been telling us the exact opposite for years. Simple, because just as with Einstein's $E=MC^2$, there is a strict energetic limit as the Miskolczi Law proves.

Dr. Miskolczi's Constant was discovered with a program that is the result of a project started 25 years ago in Hungary. It was then he began the process of writing a high-resolution radiative transfer program which would describe the Earth's climate using the TIGR Global radiosonde archive of the Laboratoire de Meteorologie Dynamique, Paris database. With this information he was able to accurately describe mathematically how the atmosphere absorbs and releases heat using a long standing Equation called the

Schwarzschild-Milne transfer equation to accurately calculate the Earth's infrared optical depth. That is what Global climate is; the process by which Earth either holds onto or releases heat. The IPCC and the CRU scientists would have us believe that CO₂ increases the heat the atmosphere holds on an infinite unlimited basis. That conclusion is absolutely false, and the CRU and the IPCC have had to falsify and invent data to make it appear that it does.

In reality water is so overwhelmingly abundant on Earth, it dominantly, completely, and overwhelmingly governs the climate equilibrium of the Earth. It is 71% of the total surface area of the planet, 333 Million cubic miles (a cubic mile is an imaginary cube measuring one mile on each side) of water exist here, by far outweighing all other greenhouse gasses.

Can our climate undergo changes due to the addition of greenhouse gasses? Yes, but only under circumstances great enough to overwhelm the presence of 333 million Cubic miles of water, such as the impact of a large Asteroid and the tremendous heat it would add instantly. Carbon Dioxide is very far inside the greenhouse effect's self-regulatory barriers. Amounts even double our current emissions, cannot overwhelm this equilibrium. Only the Sun has that immense amount of power, and only water exists in quantities large enough to effect such a change. As long as the sun's activity is the "business-as-usual" fluctuations and there is water on Earth, CO₂ cannot cause or increase global warming.

Equilibrium

In order to correctly understand why this is, it is necessary to recognize that what is important here is the equilibrium between the incoming energy from the sun (heating) and the outgoing longwave (infra red) energy (cooling). The 40% of the planet that is not cloud covered at any given time allows for solar radiation to be absorbed at the surface. The most effective form of cooling is the evaporation of water, which takes heat energy from the surface and puts it into the air. Clouds form which do three things: 1) create more cloud cover reflecting solar radiation away from the planet which also 2) releases heat into the very high upper atmosphere where it is radiated out into space as the clouds condense into precipitation, and 3) drops much cooler water back down to the surface cooling things even further. This is an oversimplification for the sake of brevity and clarity, the interactions here are very complex as is the equation which describes it (the detailed mathematics can be found below in "The Saturated Greenhouse Effect Theory of Ferenc Miskolczi"). However, this does not change the simple fact that our planetary climate system is at equilibrium, and the Miskolczi Constant allows science to completely describe that equilibrium. For the first time, we can do so accurately with raw data, and match observed data with the results. No "hide the decline" needed when simply describing reality.

Climate scientist and fellow Hungarian, Dr. Miklos Zagani in his paper "CO₂ Cannot Cause any more "Global Warming"" dated December 2009 describes this discovery and its meaning. Dr. Zagani beautifully sums it up all up:

"Since the Earth's atmosphere is not lacking in greenhouse gases [water vapor], if the system could have increased its surface temperature it would have done so long before our emissions. It need not have waited for us to add CO₂: another greenhouse gas, H₂O, was already to hand in practically unlimited reservoirs in the oceans."

Dr. Zagoni explains:

"Earth type planetary atmospheres, having partial cloud cover and sufficient reservoir of water; maintain an energetically uniquely determined, constant, maximized greenhouse effect that cannot be increased further by emissions. The greenhouse temperature must fluctuate around this theoretical equilibrium constant; [change] is possible only if the incoming available energy changes."

Saturated Greenhouse Effect Theory

Let's get more basic in dismantling the IPCC's "theory" of climate. If one takes Earth's greenhouse gasses away, the planet would be about -18 degrees C (-64.4 Degrees F) on a global average. Add in the greenhouse gasses and their influence back in using the Miskolczi Constant and you get a 33 degree C increase to 15 degrees C (59 Degrees F). This value is constant, and maximized on a global scale. It also matches observed data. Raw data, not manipulated or computer processed data. Using Miskolczi's law and constant, there is no need for manipulated data, only the real observations, and that is the reason this discovery is so significant. If you double the amount of current CO2 emissions and add that to the equation, and you cannot come up with the 35 to 38 Degree C increase that the IPCC and Al Gore have been preaching about. It is physically and mathematically impossible, and thanks to the Miskolczi Law and Constant, provable and repeatable by scientists the world over. Miskolczi's Law and Constant yet to be disproven

Dr. Miskolczi first published his work in the Quarterly Journal of the Hungarian Meteorological Services in 2004, Volume 108, No 4. He published further statistical proof in the same Journal in 2007, Volume 111, No. 1. In the 5 years since he first published his results, not one peer review has come back disproving his theory, or his Constant. To date, not one scientist has come forward to disprove Miskolczi's theory that the Earth's climate is at equilibrium, and that Carbon Dioxide cannot be released in amounts great enough to upset that equilibrium.

"During the 61-year period, in correspondence with the rise in CO2 concentration, the global average absolute humidity diminished about 1 per cent. This decrease in absolute humidity has exactly countered all of the warming effect that our CO2 emissions have had since 1948." - Dr. M. Zagoni

In short, according to Dr. Miskolczi's discovery, Earth's temperature will not rise or fall as a result of increasing CO2 emissions because of the inherent equilibrium created by our oceans upon oceans of water.

The Saturated Greenhouse Effect Theory of Ferenc Miskolczi

Special thanks to Dr. Miklos Zagoni. This article would not have been possible without his assistance. Thank you Dr. Zagoni!

Author's addendum

This discovery is proof that the IPCC has been lying to the world, along with the CRU and other agencies which have been pushing for programs such as Carbon Cap and Trade schemes. That scheme was designed to coerce peoples and governments into handing over tax dollars for the UN to manage and redistribute as it sees fit. Carbon Dioxide emissions cannot cause Global Warming. Government agencies including the US Federal Government and the White House continue to push this issue as a prelude to instituting a Cap and Trade Tax scheme here in the United States, and it is based upon fraudulent science.

A segment of the scientific community has had its credibility usurped for what amounts to fraud and embezzlement, and indeed went along willingly in order to continue to receive funding for their grant programs for decades. In other words they "produced" predetermined results according to what the check writers wanted to see in order to keep their jobs. Their own internal emails prove that. That's not Science, which describes reality as it is. That is Science Fiction, and should be condemned as the fraud that it is.

The American Government, and governments the world over, should be prevented at all costs from instituting Cap and Trade Taxation. Reducing carbon emissions, taxing them into oblivion, will not alter the Earth's climate in the least. It will however beggar this Nation and its citizens, every other nation which institutes it, and have no effect on the climate at all.

UPDATE: Sometimes the greatest evidence of the truth being told is the persecution of those discovering it and telling it, particularly when that truth damns those in power as being corrupt:

<http://geoplasma.spaces.live.com/blog/cns!C00F2616F39D0B2B!895.entry>

January 03

Another Scientist Silenced

The deft hand of the socialism hasn't really left us, as the following note received via email shows.

Why Dr Ferenc Miskolczi and Dr Miklos Zagoni have been put under pressure to be silent about Miskolczi's research concerning the atmosphere and the greenhouse effect.

In 2004 Dr Ferenc Miskolczi published a paper 'The greenhouse effect and the spectral decomposition of the clear-sky terrestrial radiation', in the Quarterly Journal of the Hungarian Meteorological Service (Vol. 108, No. 4, October-December 2004, pp. 209-251.).

The co-author of the article was his boss at NASA (Martin Mlynchak). Mlynchak put his name to the paper but did no work on it. He thought that it was an important paper, but only in a technical way.

When Miskolczi later informed the group at NASA there that he had more important results, they finally understood the whole story, and tried to withhold Miskolczi's further material from

publication. His boss for example, sat at Ferenc's computer, logged in with Ferenc's password, and canceled a recently submitted paper from a high-reputation journal as if Ferenc had withdrawn it himself. That was the reason that Ferenc finally resigned from his (\$US 90.000 /year) job.

I want to make it clear: NASA never falsified or even tried to falsify Ferenc's results, on the contrary, they fully understand it. They know that it is correct and see how important it is. To make sense of their actions, they probably see a national security issue in it. Perhaps they think that AGW is the only way to stop, or to slow, the coal-based growth of China.

In my circumstance where I have been dismissed from my Government paid position in Hungary, I think the information vacuum (in Hungary), has the same type of origin. I believe someone is in the background trying to convince the establishment (media, science, politics) that Miskolczi's results are against our national security interests. First, they tried to frighten me, and then when that did not work, they kicked me out from my job. So now I am turning to the wider internet to publicise Miskolczi's work, as I know that his results are valid and true. There is no way and no need to hold them back for the world to understand them.

Tomorrow, for the first time in my life, I am jobless.

Budapest, 31 Dec, 2009

Dr Miklos Zagoni

(57)

physicist

Hungary

<http://miskolczi.webs.com>

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-12 16:46:16

No Duplicates.

Comment 2 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Nicholas
Last Name: Dennis
Email Address: ndennis@icfi.com
Affiliation:

Subject: Proposed Withdrawal of Board Adoption of Approved Forest Protocols
Comment:

2829 Lakewood Ranch Road
Weed, CA 96094
February 18, 2010

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814
(Submitted my email)

SUBJECT: Proposed Withdrawal of Board Adoption of Approved Forest Protocols

Dear Board Members:

The Northern California Society of American Foresters (NorCal SAF) includes roughly 700 foresters in northern California. Our primary mission is to advance the science, education, technology, and practice of forestry. NorCal SAF strenuously opposes withdrawal of Air Resources Board (Board) adoption of Climate Action Reserve (CAR) forest protocols. Forests play an important role in carbon sequestration. Forest Carbon Project Protocol Version 3.0 is essential to allow forest owners to participate in carbon markets and to contribute in a verifiable way to meeting California's ambitious goals for greenhouse gas reductions. The Board adopted forest and urban forest project protocols less than five months ago. NorCal SAF is unaware of any new information that has come to light in the interim that could possibly justify this abrupt and disruptive reversal of state policy. Withdrawing adoption would drastically undermine all progress to date to encourage forest owners to participate in carbon markets and would eliminate a key incentive for them to remove or reduce atmospheric carbon.

We agree that the forest protocols and the process for protocol development can and should be improved as California moves from voluntary- to compliance-based approaches to greenhouse gas reduction. However, the way to do that is by adaptive management, i.e., by having forest owners, carbon project developers, third-party offset verifiers, and forest scientists work with the protocols to learn their strengths and weaknesses and the best ways to respond thereto. Rather than withdrawing adoption of the protocols at this early, highly vulnerable stage, the Board should be signaling its sustained support for legitimate forest carbon projects and verifiable carbon offsets. Several Board members have

expressed potentially legitimate concerns about some forest practices such as clearcutting. But please consider that, for achieving the climate goals of AB32, the Board should focus on whether forest practices will in fact result in net carbon sequestration; the non-climate environmental impacts that may or may not result from such forest practices are the purview of other regulatory agencies, including CalFire, the Board of Forestry, the Department of Fish and Game, and the regional water boards.

Withdrawing adoption now would likely upset stakeholder confidence in CAR so thoroughly as to preclude its survival. It would invite lawsuits that portend large liabilities for state taxpayers from forest owners who have invested in CAR forest carbon projects mistakenly presuming that Board adoption in fact meant adoption. Responding to the threat of litigation by making the proposed about-face in state policy would send the worst possible signal to AB32's future regulated community about the ability of the Board to regulate in good faith.

Thank you for your consideration.

Sincerely,

Nicholas Dennis, Ph.D., Chairman
Northern California Society of American Foresters

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/2-arb_forest_protocol_withdrawal.doc'

Original File Name: ARB_forest protocol withdrawal.doc

Date and Time Comment Was Submitted: 2010-02-18 15:10:57

No Duplicates.

Comment 3 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Joshua

Last Name: Hart

Email Address: velorution@yahoo.com

Affiliation:

Subject: Withdraw Support for Carbon Offsets, a Deceptive Shell Game

Comment:

Feb. 23rd, 2010

Dear California ARB,

As someone deeply concerned about the effects of climate change, I applaud your proposal to limit the types of offsets acceptable to the state of California under AB32. I would encourage you to go further and reject the false solution of carbon offsetting entirely, as it is counterproductive to the urgent need to drastically reduce the burning of fossil fuels. I hope you would agree that there are now sufficient questions about the veracity, accounting procedures, and avoidance of 'additionality' that the state's resources are best focused on cutting GHG emissions at source rather than "outsourcing" this task and trusting for-profit companies with emissions reductions. I've written up a position paper that outlines the specific reasons for this stance.

Background: With a scientific consensus having emerged that human beings are warming up the planet, risking catastrophic damage if we continue with business as usual, much of the conversation around climate change has shifted away from "why is this happening?" to "what are we going to do about it?" The solutions being discussed range from the local and practical, such as organizing community bicycle repair co-ops to the global and fantastical, like placing giant space mirrors in orbit. One of the 'solutions' that has been eagerly embraced by industry is that of carbon trading and offsetting, where a company (or individual) who doesn't want to cut their carbon emissions essentially pays someone else to do it for them, thereby salving their consciences and improving their public image. Many of the largest financial institutions in the world- the same ones who are responsible for ongoing climate damage- are heavily invested in the carbon market, including Goldman-Sachs, Barclays and Citibank.

Real Solutions: The solution to climate change is simple. We need to stop (or at least dramatically reduce) the burning of fossil fuels as soon as possible. Any "solution" that does not progress toward this goal is a dangerous distraction from the major transition that is required. By providing psychological justification to continue to dump carbon into the atmosphere, the sale of offsets allows people to live within a narrative that says we can continue our existing lifestyles and still have a safe, stable future. That's why auto, oil, and utility companies have seized upon offsetting- because it provides ecological cover for their increasingly damaging business practices. Just like a cigarette addict cannot imagine a life free of smoking, it is

difficult for most of us to imagine a life without fossil fuels. Because of our collective addiction, we are eager to embrace false solutions (think Marlboro lights, filters, smokeless tobacco, etc.)

The reality is that we need to overcome our chronic dependence on oil, coal, and gas if we are to avoid lasting damage to the future of life on the planet. The sale of carbon offsets distorts this basic truth, and distracts us from implementing real solutions to the current crisis.

The Future of Carbon Trading: The carbon trading industry (that includes carbon offsets) is already a multibillion dollar industry.

Offset firms like Terrapass have grown rapidly over the past several years, with their bumper stickers proclaiming "I clean up after my car" now a common sight on Bay Area roads. With the possible passage of federal Cap and Trade legislation, carbon trading is likely to become a trillion dollar industry by the end of this decade. Fortunately the truth about carbon markets is coming out. A number of critical articles have appeared lately in national publications including Harper's, the New York Times, and the Nation exposing carbon trading as a deceptive shell game. (see links below). A number of travel companies such as Responsible Travel have rejected offsets, and now believe that they are a "medieval pardon that allows people to continue polluting." However, millions of people continue to believe that if they pay \$49.95 a year to an offset firm, they can erase the damage to the atmosphere that their driving or flying habits cause. This is a destructive lie that needs to be exposed.

News articles on Carbon Offsetting:

Harper's: Conning the Climate: Inside the Carbon Trading Shell Game (pdf document)

<http://citizensclimatelobby.org/files/Conning-the-Climate.pdf>

New York Times: Paying More for Flights Eases Guilt, not Emissions

<http://www.nytimes.com/2009/11/18/science/earth/18offset.html>

The Nation: Don't bet on Offsets

http://www.thenation.com/doc/20070507/thompson_moles

Business Week: Another Inconvenient Truth

Behind the feel-good hype of carbon offsets, some of the deals don't deliver

http://www.businessweek.com/magazine/content/07_13/b4027057.htm

Other Background Information

The Story of Cap and Trade

<http://www.storyofstuff.com/capandtrade/>

CheatNeutral: Pay to offset your marital infidelity!

<http://www.cheatneutral.com/>

Sincerely,

Joshua Hart

Joshua Hart Bio

Joshua Hart MSc has worked as a professional transportation advocate since 2000, first as Project Coordinator for the

Rails-to-Trails Conservancy from 2000-2002 and then as Program Director for the San Francisco Bicycle Coalition from 2003-2005. He obtained a Masters degree (with merit) in Transportation Planning at the University of the West of England in Bristol from 2006 to 2008, and completed research entitled Driven to Excess, presenting the social and quality of life impacts of automobile traffic on local residents. The research was covered in over 100 international media outlets including the BBC, the Guardian, Tehran Times, and the Daily Mail.

Joshua has extensive experience managing environmental and transportation campaigns, including formal media training and extensive interviewing and public speaking experience. He maintains a blog at <http://onthelevelblog.com>.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 12:19:28

No Duplicates.

Comment 4 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Linda

Last Name: Thomas

Email Address: lfthomas@winfirst.com

Affiliation:

Subject: Clear cutting offsets

Comment:

Forest offsets should not be permitted unless they are additional to business as usual, and do not give credit for clearcutting and plantation forestry. Plantation trees are net sources of emissions for decades after clearcutting. And, under the current protocols, these stands can be cut at 100 years. At 100 years, they will just be starting to store the carbon lost from the previous cutting.

Put some teeth into the protocols. In order to qualify as an offset, a forest stand should be protected by a legally binding conservation easement which will ensure conservation in perpetuity. Voluntary compliance and self monitoring have no place in cap and trade schemes!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 17:20:27

No Duplicates.

Comment 5 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Carroll

Last Name: Nast

Email Address: canast@wizwire.com

Affiliation:

Subject: Stop carbon credits for clearcutting

Comment:

It is important that you withdraw forestry protocols that allow forest offsets unless they are additional to business as usual, and do not give credit for clearcutting and plantation forestry. Plantation trees are net sources of emissions for decades after clearcutting. And, under the current protocols, these stands can be cut at 100 years. At 100 years, they will just be starting to store the carbon lost from the previous cutting.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 17:33:16

No Duplicates.

Comment 6 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: LaVerne

Last Name: Ireland

Email Address: lireland@ix.netcom.com

Affiliation: none

Subject: Forestry Protocols

Comment:

Please do NOT allow "credits" for clearcutting or "plantation" forestry. These operations will contribute atmospheric carbon for decades; by the time they begin to absorb carbon it will be much too late to do any good. "Cap and Trade" is not a solution to any problem. It's just a shell game and needs to be buried somewhere nice and deep.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 17:52:17

No Duplicates.

Comment 7 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Sean

Last Name: Wirth

Email Address: wirthsoscranes@yahoo.com

Affiliation: Sierra Club, Habitat 2020

Subject: Forestry protocols

Comment:

The fact that clearcutting and replanting would result in carbon credits defies the imagination, as well as good science. Recent forestry research indicates that the larger trees that are being cut are more effect at removing carbon than their seedling replacements. It is essential that the forestry protocols are removed.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 18:15:19

No Duplicates.

Comment 8 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Jay
Last Name: Averill
Email Address: jayaverill@comcast.net
Affiliation: Sierra Club

Subject: FORESTRY PROTOCOLS
Comment:

I want the Forestry Protocols withdrawn.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 18:26:32

No Duplicates.

Comment 9 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: robert

Last Name: joehnck

Email Address: joehnck@usamedia.tv

Affiliation: attorney

Subject: GHG Forest Protocols

Comment:

I wish to add my name to the list of commentators objecting to the present rules for crediting, for cap and trade purposes, any forest or forest practices in which clear cutting may take place. While I personally believe that it is premature to place any forests in cap and trade that are not legally bound to preserve trees above some minimum (such as 15 inch dbh trees) permanently, it is clearly in no one's public interest to place tree farming forests into the cap and trade program, at least until such time as undisputed scientific data demonstrates that this type of forestry produces on an immediate and permanent basis a net GHG reduction on a per trade basis.

Robert N. Joehnck

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 18:38:27

No Duplicates.

Comment 10 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 11 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Sylvia

Last Name: Condon

Email Address: richsylcon@starstream.net

Affiliation:

Subject: Forestry Protocol/s

Comment:

I wish to have the Forestry Protocols withdrawn. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 19:07:14

No Duplicates.

Comment 12 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Beth
Last Name: DeLashmutt-Poore
Email Address: bethdpore@msn.com
Affiliation: Sierra Club

Subject: GHG Protocols and Clearcutting
Comment:

Clearcutting should not be allowed, period. It disrupts the eco-system of the forest and can not be restored in our lifetime.

Additionally, to give carbon credits for clearcutting makes no sense whatsoever. We must stop letting greed dictate the way business is done, and do the right thing for future generations. We are stewards of the planet, not owner-masters of a plantation.

Thank you for consideration of my appeal.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 20:22:39

No Duplicates.

Comment 13 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Michael

Last Name: Ho

Email Address: aaronkwik@hotmail.com

Affiliation:

Subject: withdraw Forestry Protocols

Comment:

I am absolutely against granting carbon credits to logging companies for clearcutting and replanting a single species of trees. Both clearcutting and tree plantations are net sources of emissions. Furthermore, these actions reduces the biodiversity, harms the wildlife and habitat, which jeopardizes the ecological stability of the area.

It's stated in the current protocols that the planted trees could be cut after 100 years, but it's only at 100 years that those trees absorb all the carbon that was released from the previous cutting.

Please mandate that in order for logging companies to be awarded carbon offsets, forest stands should be protected by a legally binding conservation easement. Voluntary compliance and self monitoring is not the way to protect our precious forests. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 20:26:20

No Duplicates.

Comment 14 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Sean

Last Name: Wirth

Email Address: wirthsoscranes@yahoo.com

Affiliation:

Subject: Forestry protocols

Comment:

What research are you relying on that allows you to consider clearcutting and replanting a worthy candidate for carbon credits? My understanding is that recent forestry research on coastal redwoods indicates that the trees that are removed by clear cutting are more effective at sequestration than seedlings and young trees.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 21:03:21

No Duplicates.

Comment 15 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: James

Last Name: McRitchie

Email Address: jm@corpgov.net

Affiliation:

Subject: Greenhouse Gas Accounting Protocols

Comment:

Forest offsets should not be permitted unless they are additional to business as usual. Please don't give credit for clearcutting and plantation forestry. Plantation trees are net sources of emissions for decades after clearcutting. Under the current protocols, these stands can be cut at 100 years. At 100 years, they will just be starting to store the carbon lost from the previous cutting.

In order to qualify as an offset, a forest stand should be protected by a legally binding conservation easement that will ensure conservation in perpetuity. Voluntary compliance and self monitoring have no place in cap and trade schemes.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 21:12:19

No Duplicates.

Comment 16 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Terelle

Last Name: Terry

Email Address: tsterry5@msn.com

Affiliation:

Subject: Forestry Protocols

Comment:

I beleive that the forestry protocol to clearcut forests for carbon credits is unscientific, wasteful, destructive, and ultimately a plan for ecoterrorism.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 22:34:56

No Duplicates.

Comment 17 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Mary

Last Name: Milewski

Email Address: mfmilew@prodigy.net

Affiliation:

Subject: Forestry Protocols Withdrawn

Comment:

Please do not give credit for clear cutting and plantation forestry
or permit offsets unless they are additional to business as usual.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-23 23:57:10

No Duplicates.

Comment 18 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Linnea Fronce &
Last Name: Thomas Hall
Email Address: wildart@dslextreme.com
Affiliation:

Subject: Forestry Protocols
Comment:

We ask that you withdraw the Forestry Protocols. Considering the century of global warming impacts from clear cutting, it is not feasible to use the replanting of monoculture seedlings for cap and trade mitigation.

Cap & Trade must include guarantees that MATURE forest will not be cut down, IN PERPETUITY. And volunteer policing will not work. It seldom does, and there are too many timber companies who don't care about the future of our forests.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-24 06:24:36

No Duplicates.

Comment 19 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Neville

Last Name: Loberg

Email Address: nevilleloberg@hotmail.com

Affiliation:

Subject: Withdraw Forestry Protocols

Comment:

ARB - The right action here is to withdraw Forestry Protocols. It's just another run-around/manipulation to clearcut forests. There is a better way.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-24 07:01:11

No Duplicates.

Comment 20 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Marilyn

Last Name: Jasper

Email Address: mjasper3@hotmail.com

Affiliation:

Subject: REVOKE Forestry Protocols

Comment:

We urge the CA Air Resources Board (CARB) revoke its "Forest Project Protocol," and to flatly reject any such "forestry protocols" that shamefully give carbon credits for clearcutting and other destructive forest practices on forest lands. Not only is this a disgraceful ploy but worse, it destroys any faith the public may have had in trusting that officials would be making wise, ethical decisions regarding air quality. If the forestry protocols are allowed to stand, CARB's mandated processes will be viewed as just more shell games.

"Cap and Trade" may or may not be legitimate, but that is not the issue here. In addition to lacking meaningful and adequately-funded monitoring programs, as long as the forestry protocols have no mandatory conservation easements in perpetuity, then there are no guarantees for implantation over time.

Thank you for considering our views and voting to revoke.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-24 09:03:12

No Duplicates.

Comment 21 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: Comments on withdrawl of approval of voluntary protocols

Comment:

Please see attached pdf file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/22-final_comments_to_arb_re_withdrawl_of_fpp.pdf'

Original File Name: final comments to ARB re withdrawl of FPP.pdf

Date and Time Comment Was Submitted: 2010-02-24 10:46:09

No Duplicates.

Comment 22 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Shanna
Last Name: Brownstein
Email Address: sbrownstein@climatetrust.org
Affiliation: The Climate Trust

Subject: Comments by The Climate Trust Regarding ARB's Process for Adopting GHG Protocols

Comment:

Attached please find The Climate Trust's comments regarding ARB's process for adopting GHG accounting protocols.

Sincerely,

Shanna Brownstein

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/23-tct_comments_to_arb_022410_final.pdf'

Original File Name: TCT Comments to ARB 022410 FINAL.pdf

Date and Time Comment Was Submitted: 2010-02-24 11:01:57

No Duplicates.

Comment 23 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Chris

Last Name: Kelly

Email Address: ckelly@infoasis.com

Affiliation: The Conservation Fund

Subject: 2/25/10 ARB meeting, Agenda Item 10-2-9

Comment:

Attached please find the preliminary comments of The Conservation Fund in connection with the above referenced agenda item. Thank you very much.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/24-carb_-_2.25.10_meeting_comment_letter.doc'

Original File Name: CARB - 2.25.10 meeting comment letter.doc

Date and Time Comment Was Submitted: 2010-02-24 10:41:41

No Duplicates.

Comment 24 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Catherine

Last Name: Brower

Email Address: catb712@comcast.net

Affiliation:

Subject: Forestry Protocols

Comment:

Please note that I want the Forestry Protocols withdrawn. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-02-24 11:16:10

No Duplicates.

Comment 25 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Adam

Last Name: Stern

Email Address: astern@terrapass.com

Affiliation: TerraPass Inc.

Subject: offset protocols

Comment:

Please consider the attached comments on offset protocols. Thanks.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/26-offset_protocols__comments_to_carb__2-24-10_.pdf'

Original File Name: offset protocols (comments to CARB, 2-24-10).pdf

Date and Time Comment Was Submitted: 2010-02-24 11:33:18

No Duplicates.

Comment 26 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Steven

Last Name: Huhman

Email Address: steven.huhman@morganstanley.com

Affiliation:

Subject: MSCG Comments

Comment:

Attached please find the Comments of Morgan Stanley Capital Group Inc.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/27-comments_of_mscg_to_carb_regarding_voluntary_protocols__2.24.10_.doc'

Original File Name: Comments of MSCG to CARB Regarding Voluntary Protocols (2.24.10).doc

Date and Time Comment Was Submitted: 2010-02-24 11:43:35

No Duplicates.

Comment 27 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Vivian

Last Name: Parker

Email Address: vparker@cwo.com

Affiliation:

Subject: GHG Accounting Protocols for Compliance; Forestry Protocols

Comment:

Please accept the attached letter for your analysis of this issue and for record.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/28-vivian_parkercomments_feb23_2010.pdf'

Original File Name: Vivian ParkerComments_Feb23_2010.pdf

Date and Time Comment Was Submitted: 2010-02-24 11:43:35

No Duplicates.

Comment 28 for Greenhouse Gas Accounting Protocols (ghgprot) - Non-Reg.

First Name: Roger

Last Name: Williams

Email Address: rwilliams@bluesource.com

Affiliation: Carbon Offset Providers Coalition

Subject: COPC Comments on Agneda Items Nos. 10-2-9 and 10-2-4

Comment:

Please see the attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/29-copc_letter_re_proposal_to_withdraw_board_adoption_of_voluntary_protocols__2.24.10__w_attachments.pdf'

Original File Name: COPC Letter re Proposal to Withdraw Board Adoption of Voluntary Protocols (2.24.10) w_attachments.PDF

Date and Time Comment Was Submitted: 2010-02-24 11:50:41

No Duplicates.

Comment 29 for Greenhouse Gas Accounting Protocols (ghgprot) - 45 Day.

First Name: Myriam
Last Name: Mills
Email Address: millsMM@cdm.com
Affiliation:

Subject: RRI Energy
Comment:

On behalf of RRI Energy, Inc., we would like to submit the following comment to the CARB Board on the proposal to withdraw Board approval of the Climate Action Registry (CAR)'s voluntary offset protocols:

For companies working now to develop a portfolio of compliance instruments, the Board's pending action, whether intentional or not, creates a great amount of uncertainty. Therefore, CARB should clearly describe the differences between each of the existing "approved" CAR voluntary protocols and protocols CARB will accept to create compliance-grade offsets for AB 32. CARB should also indicate when such compliance-grade protocols will be adopted.

If you have any questions, please feel free to contact me at (713) 423-7326, or Brian McQuown of RRI Energy at (702) 407-4861.

Thank you,

Myriam (McChargue) Mills

CDM | 3050 Post Oak, Suite 300 | Houston, TX 77056 | Phone: (713) 423-7326 | Fax: (713) 840-0173 | www.cdm.com

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-03-04 12:30:54

No Duplicates.

Comment 1 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Lily

Last Name: Mitchell

Email Address: l Mitchell@hanmor.com

Affiliation:

Subject: Southern California Public Power Authority

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/30-lily.pdf>

Original File Name: Lily.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 2 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Betsy

Last Name: Reifsnider

Email Address: Non-web submitted comment

Affiliation:

Subject: Catholic Charities

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/31-betsy.pdf>

Original File Name: Betsy.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 3 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Tamara
Last Name: Raspberry
Email Address: trasberry@sempra.com
Affiliation:

Subject: Sempra Energy
Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/32-tamara.pdf>

Original File Name: tamara.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 4 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Nico

Last Name: Van Aelstyn

Email Address: Non-web submitted comment

Affiliation:

Subject: Carbon Offset Providers Coalition

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/33-nico.pdf>

Original File Name: Nico.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 5 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Susan

Last Name: Robinson

Email Address: Non-web submitted comment

Affiliation:

Subject: Ebbets Pass Forest Watch

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/34-susan.pdf>

Original File Name: susan.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 6 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Luke

Last Name: Breit

Email Address: luke@forestsforever.org

Affiliation:

Subject: Forest Forever

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/35-luke.pdf>

Original File Name: luke.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 7 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Michael

Last Name: Endicott

Email Address: Non-web submitted comment

Affiliation:

Subject: Sierra Club

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/36-michael.pdf>

Original File Name: michael.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 8 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Barry

Last Name: Wallerstein

Email Address: Non-web submitted comment

Affiliation:

Subject: AQMD

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/37-barry.pdf>

Original File Name: Barry.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 9 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Marily

Last Name: Woodhouse

Email Address: Non-web submitted comment

Affiliation:

Subject: Coalition Stop Clearcutting

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/38-marily.pdf>

Original File Name: Marily.pdf

Date and Time Comment Was Submitted: 2010-02-26 16:03:39

No Duplicates.

Comment 10 for Greenhouse Gas Accounting Protocols (ghgprot). (At Hearing)

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation:

Subject: Energy and Resources Group

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghgprot/39-barbara.pdf>

Original File Name: Barbara.pdf

Date and Time Comment Was Submitted: 2010-03-02 13:23:18

No Duplicates.