



DEPARTMENT OF PARKS AND RECREATION  
Colorado Desert District  
200 Palm Canyon Drive  
Borrego Springs, CA 92004

Ruth Coleman, Director

February 17, 2011

Ms. Mary D. Nichols, Chairman  
California Air Resources Board  
Via web submission

**Re: Request Revision to Climate Action Reserve Forest Project Protocol 3.2 Regarding Definition of Project Area Boundaries**

Dear Chairman Nichols and Members of the Board:

The following is a proposal which requests a revision to the language of the Reserve's Forest Project Protocol (FPP 3.2) concerning the approach to defining the Project Area boundaries for the initial site verification of Reforestation Projects.

**Proposal**

The California Department of Parks and Recreation (California State Parks) requests changes to the FPP 3.2 language in order to allow a Forest Owner to finalize the geographic boundaries of the Project Area at the second site verification. This would apply to Reforestation Projects that have elected to defer initial inventory until the second site verification (FPP 3.2, Section 6.1.1). The Forest Owner would be required to submit a "draft" set of geographic boundaries for the Project Area that met all eligibility requirements at the initial project verification. However, these Project Area boundaries could be revised and finalized at the second site verification as long as the finalized boundaries are the same, or a subset of, the original "draft" boundaries submitted and verified for eligibility at the initial verification. The reason for this proposed revision is the need for flexibility to define acres to be planted over first 10-12 years of the project that will ensure maximum success and survivability of the reforestation, protect resources, and avoid unneeded costs.

**Background**

The Cuyamaca Rancho State Park (CRSP) Reforestation Project consists of replanting 2,530 acres in the 24,768 acre park over a 10 year to 12 year period in dispersed patches designed to advance restoration of the mixed conifer forests of the park over time. The project was submitted to the Climate Action Reserve (Reserve) on September 16, 2009 and is listed as project # CAR505. At the initial verification, California State Parks is faced with a dilemma to meet the obligations of defining the Project Area within the 30 month initial verification window while at the same time needing flexibility to narrow down the remaining acres to be planted.

## Reasons for this Proposal

### 1. Need Future Flexibility for Acreage Chosen for Reforestation

The initial acreage nominated and mapped for planting in the project included acreage with:

- ✓ Little to no natural tree regeneration.
- ✓ Occupation by conifer woodland before the Cedar Fire.
- ✓ Suitable soils to support forest vegetation.
- ✓ Slope under 40%.
- ✓ Aspect northerly @ 337 to 90 degrees.
- ✓ Elevation above 5,400 feet.
- ✓ Distance to nearest viable seed source with the goal of planting away and upslope from those sources in order to create additional viable seed sources.

The first three years of experience with this project have shown that additional attributes need to be considered to identify the optimal reforestation sites in the park. The additional flexibility in nominating and finalizing sites is needed for the following reasons:

- ✓ Pre-fire conifer forests made up a non-contiguous subset of the park. Our goal is to reforest “sky islands” which will then disperse seeds and continue the natural reforestation process. To accomplish this, reforestation efforts are taking place on non-contiguous, non-homogeneous acreage.
- ✓ Results from survival surveys on reforested sites and feedback for suitable soil/aspect/slope attributes are needed to inform subsequent site selections.
- ✓ Cost and effectiveness of site preparation work by available contractors. The project has not been totally funded yet and availability of funds will affect our ability to reach the target goal of 2530 acres.
- ✓ California State Parks are mandated to preserve and protect cultural resources. Every acre planted must undergo rigorous archeological and cultural survey work prior to approval for planting. In some areas mastication and/or prescribed burning must occur prior to commencing these surveys due to the presence of thick brush. Only after completion of the surveys are sites able to be approved for planting.
- ✓ California State Parks must consider the unique ecology of each nominated planting site and make assessments for each nominated planting site based upon pre and post fire vegetation data, microclimate, habitat characteristics, accessibility, and other factors.

With this in mind, a second set of maps has been completed that resulted in nominating between 5,000 and 6,000 acres out of which approximately 2,055 acres will be planted to complete the total 2530 acres of the project (475 acres have been planted to date). The total acreage of these initial Project Area maps represents more acres than will actually be planted after reforestation activities are complete. The flexibility of identifying these additional acres in a “draft” design document allows for subsequent refinement of the

Project Area through additional experience and detailed survey work not available within the time frame of the initial site verification.

## **2. Cost of Monitoring of Non-Reforested Areas**

One option for the Forest Owner, such as California State Parks, to maintain a level of flexibility for future reforestation sites is to include the total nominated acres (5000-6000 acres) in the final Project Area boundaries. However, this will result in additional and unnecessary monitoring costs associated with acres that will not be planted as part of this project. The inventory work and monitoring of these acres not impacted by the project could potentially add thousands of dollars annually to the 100-plus years of monitoring obligation of the park. These extra costs will be incurred without providing any additional carbon accounting value to ensure the accuracy of the CRTs generated by this project. This is detrimental to the ability of the project to obtain funding.

## **3. No Impact on the Ability to Provide a Qualitative Baseline**

The inventory for the baseline has been deferred until the second site visit verification as provided for Reforestation Projects in the Forest Protocol, Version 3.2. With this deferral, the qualitative baseline for the Reforestation Project can be completed without a finalized set of Project Area boundaries.

## **4. No Impact on Eligibility**

The Forest Owner will need to establish eligibility for all the acres found within the “draft” Project Area boundaries at the initial site verification. The Project Area boundaries finalized at the second verification will need to be either the same or a subset of the acres originally verified for eligibility. All of the acres nominated for planting for the CRSP Reforestation Project have the following characteristics:

- ✓ Will have experienced a Significant Disturbance that removed at least 20% of the above-ground biomass.
- ✓ Will be subject to the same laws, statutes, regulations, or other legal mandates that would encourage or require reforestation on the Project Area.

## **5. The Potential for Future Projects**

An additional concern of California State Parks is to consider the opportunities for future project submissions. California State Parks would like to avoid including acreage in the final Project Area boundaries for this project that may be desirable for a second or third reforestation project in the park. By prematurely including acreage that is currently nominated but not planted within a set of finalized boundaries of this first project, these acres will be ineligible for inclusion in a second or third reforestation project area. (See Section 10 (a) (8) of the Project Implementation Agreement)

## **6. The Cost of Aggregating Projects on Site**

California State Parks reviewed a possible alternative to this proposal of submitting 4-5 separate projects and aggregating these projects as provided under the Guidelines for Aggregating Forest Projects. This alternative would allow for identification of specific

Project Area boundaries after completion of planting as a series of individual projects that combine to the total 2,530 acres. Project boundaries could be specified to include only areas which had already been planted. By spreading the submission of projects over time, the required 30-month initial verification timeframe could be met. However, the administrative costs and complexity for both California State Parks and the Reserve make this approach infeasible. Each project would be required to have separate project submittals, initial site verifications, Project Design Documents, Project Implementation Agreements, attestations, and annual monitoring reports. In addition, the multiple project listings would be cumbersome to communicate with funders already signed on to the project.

**Further Questions and Follow-Up**

If there are any questions or further follow-up on this comment and proposal, please do not hesitate to contact me at (760)767-4037 or [gsevr@parks.ca.gov](mailto:gsevr@parks.ca.gov) or Cuyamaca Rancho State Park Reforestation Project Manager Lisa Gonzales-Kramer at (760)767-4037 or [lgonzales-kramer@parks.ca.gov](mailto:lgonzales-kramer@parks.ca.gov).

Sincerely,

Gail Sevens  
District Superintendent, Acting

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