



(916) 653-6725

June 22, 2012

Hon. Mary Nichols
Chair
California Air Resources Board
1101 I Street
Sacramento, CA 95814

Dear Chair Nichols:

California State Parks appreciates the opportunity to provide comments to the California Air Resources Board on its evolving Investment Strategy for Cap-and-Trade Auction Proceeds.

As a state agency, State Parks is committed to reducing its Greenhouse Gas (GHG) footprint. In many respects, the largest contribution State Parks can provide to our collective efforts to address climate change is by continuing and expanding the stewardship of the large natural landscapes under its jurisdiction.

That stewardship has for many years included natural resource protection and management, including the restoration of degraded landscapes such as coastal dune and wetland ecosystems, the protection and maintenance of riparian habitats, treatment and management of exotic species, and management of forested ecosystems.

Today, our forest management program includes natural management of extensive groves of old-growth coast redwood and giant sequoia stands, along with nearly every other major native forest community in California. Our efforts to protect these landscapes utilize tools such as forest thinning and prescribed fire to improve the natural diversity and resilience of these forests. An important co-benefit of this management includes significant GHG benefits.

Forest restoration work has been demonstrated to provide GHG benefits on both sides of the accounting ledger – by improving the natural uptake of CO₂ and by reducing the severity of uncontrolled wildfires and the concomitant catastrophic release of GHGs during wildfire events.

Along with the restoration and management of other native landscapes, State Parks forested landscapes can thus contribute significantly to California's plans to mitigate climate impacts just as they play a key role in our statewide adaptation strategies. However, our current natural resource management program is able to restore resilience in only a small percentage of native ecosystems – and address only a tiny fraction of our at-risk forests – each year. The Department's current budget reductions hamper our ability to increase these efforts.

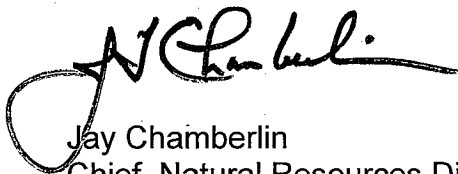
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In 2008, State Parks began a reforestation project at Cuyamaca Rancho State Park that will eventually sequester between 440,000-700,000 metric tons of CO2 equivalents. While undertaking many similar Climate Action Reserve-registered projects at State Parks is unlikely, this effort has built capacity within State Parks to quantify GHG reductions that extend to the landscape scale (i.e., beyond project-specific accounting).

As you know, the AB 32 Scoping Plan already includes recognition of the importance of sustainable forest practices as a GHG reduction strategy, and the Cap and Trade rule explicitly recognizes management of public forests as a potential GHG reduction strategy. Building on these efforts, State Parks believes that investments in State Park natural resource protection and management are worthy of a dedicated portion of future auction revenues.

Many thanks for your continued efforts to address climate change. We look forward to working with your staff and our collaborating agencies, NGOs, and members of the research community to more fully develop the framework for these important investments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Chamberlin". The signature is fluid and cursive, with a large loop at the beginning.

Jay Chamberlin
Chief, Natural Resources Division