Dear Mari Rose,

We have carefully examined the CARB Draft Investment Plan, and can offer the following comments from the perspective of Urban ReLeaf as follows:

1. Urban forestry is clearly recognized as an investment opportunity. Given that urban forestry meets every specific objective listed for prioritizing investments (i.e. maximizing economic, environmental and public health benefits; creating jobs; improving air quality; benefitting disadvantaged communities; and providing opportunities for GHG emission reduction), the inclusion of urban forestry is appropriate and necessary .
2. While we think the plan overall seems fairly comprehensive from the perspective of identifying issue areas for investment, we believe the cross-cutting integration of urban forestry into other investment sectors is not adequately addressed. We believe prioritizing urban forestry projects will have a transformative impact when coupled with select transportation projects, energy efficiency initiatives, land use planning, and affordable housing efforts.

For example, West Oakland is 67% African American, and the majority of its residents earn less than half the overall median household income of Oakland. In some parts of the district, unemployment is as high as 400% that of Alameda County, while asthma rates in children are 700% higher than county rates overall – a byproduct of Greenhouse Gas emissions, such as exposure to diesel exhaust. Similarly, child asthma rates in East Oakland are 150-200% higher than Alameda County overall.

Urban forestry can be a mechanism for bringing better health to communities through sustainable strategies. Urban forestry programs can help address equity issues such as the proximity of affordable and low-income housing to freeways and heavily-trafficked vehicle corridors. In addition to creating jobs for at-risk youth and hard-to-employ adults—which addresses one of the leading causes of crime, i.e. unemployment—urban forestry projects can be combined with other sustainable beautification and energy efficiency efforts, such as community gardens—which can be built with renewable energy components, such as solar panels and rainwater catchment systems. Moreover, urban forestry programs often involve community and youth groups, and directly lead to increased environmental awareness among young people, as well as helping to cultivate stewardship. Other benefits of biogenic infrastructure are a decrease in blight and an increase in property values—which can then be leveraged for small business loans—as well as a positive impact on psychological well-being of communities. CARB’s categorization of urban forestry as a natural resource investment, while valid and appreciated, does not tell the whole story.

1. We are encouraged by CARB’s recognition of the critical role urban forestry plays in providing benefit to disadvantaged communities.

A 2009 study on Los Angeles’ Million-Tree Initiative found the need for urban forestry projects is greater in disadvantaged communities, specifically low-income communities of color, which “had the least canopy cover and often the highest population densities.” (Pincetl, 2009). The same general findings are also true of Oakland. However, Oakland’s tree canopy overall is estimated at just 12-15%, significantly lower than Los Angeles’ rate of 21%; furthermore, those numbers are skewed by the large number of trees in affluent areas such as Montclair, Piedmont, and the Oakland hills.

In the disadvantaged communities Urban Releaf works in, the tree canopy is practically nonexistent in many areas. The lack of tree canopy in these communities contributes not only to higher rates of GHG transmissions, but also to the Urban Heat Island Effect, which has demonstrated health impacts, including general discomfort, respiratory difficulties, heat cramps, heat exhaustion, heat stroke and even death (<http://www.urbanreleaf.org/get-educated/benefits-of-trees>).

The Draft Investment Plan suggests urban forestry projects should have a minimum of 75% of funds benefitting disadvantaged communities. Urban ReLeaf believes this is an appropriate floor for base funding.

1. We do have some concerns regarding proportion of investment directed to transportation, as intimated in Figure 10. While reduction of GHG associated with transportation, i.e. diesel fumes, would surely benefit residents in East and West Oakland, current programs associated with GHG reduction, such as those administered by the Port of Oakland, have failed to achieve the significant reductions promised. Transportation strategies that speak to mode shift and sustainable efficiencies that integrate urban forestry into the infrastructure are needed, but overlooked in this Draft Plan.

In short, we believe that prioritizing urban forestry will result in outcomes exceeding projections and provide the most benefit to disadvantaged communities. As stated in the CARB Investment plan, “certain types of projects naturally lend themselves to having a greater benefit to disadvantaged communities. It is likely that those projects, such as weatherization or urban forestry, will exceed the minimum requirements established in SB 535 with a high percentage of funds expended in disadvantaged communities.”

If the spirit of SB535 is to aid disadvantaged communities and utilize the GHG emission reduction fund to level the playing field by funding projects which address environmental hazards as well as health and economic disparities, we at Urban Releaf feel strongly that increased investiture in urban forestry is the best avenue to do so, and believe the Draft Investment Plan captures much of this sentiment.

Sincerely,

Eric Arnold, Communications Manager

Kevin Jefferson, Program Manager

Urban Releaf

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