



August 5, 2013

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95184

Re: CaUFC Comments on AB 32 Scoping Plan 2013 Update

Dear Ms. Nichols,

The California Urban Forests Council (CaUFC) is pleased that the workshop materials for the 2013 update of the AB 32 Scoping Plan recognize the role that urban forestry can play in achieving the state's goals for reducing greenhouse gas (GHG) emissions.

The workshop materials for the 2013 scoping plan update discuss CalFire and urban forestry as part of the Natural and Working Lands Sector. We strongly support this inclusion and encourage Air Resources Board (ARB) to find ways to maximize the role of urban forests in reducing greenhouse gas emissions through carbon sequestration and other methods of reducing greenhouse gas emissions, such as energy savings from shade, as well as ways to incorporate urban forestry into climate adaptation strategies. We also encourage ARB to work with the Climate Action Registry on the revisions of the Urban Forest Protocols, which are anticipated to come before ARB next spring and that should foster more interest and opportunity for cities and utilities to participate in Urban Forestry Offsets.

In addition, we believe there is tremendous opportunity for urban forestry in other scoping plan sectors including Energy, Transportation, and Water. In the 2013 update, we encourage ARB to include urban forestry practices within those sectors, in addition to the Natural and Working Lands Sector.

Examples include:

Energy: Reduced energy consumption through shade and reduced urban heat island effect

- Shade from trees reduces energy consumption on site and reduces energy demands from power plants, thereby reducing greenhouse gas emissions. Increasing trees and vegetation around buildings, homes, and other structures reduces energy consumption.

- Higher temperatures in densely populated and urbanized areas increase energy demand for cooling and add pressure to the electricity grid during peak periods of demand. One study estimates that the heat island effect is responsible for 5–10% of peak electricity demand for cooling buildings in cities. Increasing shade from tree canopy and installing greenroofs in densely populated and urbanized areas reduces ambient air temperatures and urban heat island effect.

Transportation: Sustainable Communities Strategies, Complete Streets and Greenways

- As part of implementing Sustainable Communities Strategies, investments in the development of complete streets that include urban forestry and urban greening, will encourage more use of active and alternative transportation options. Encouraging the use of active and alternative transportation methods, for example by shading bicycle and pedestrian infrastructure, will reduce greenhouse gas emissions by reducing vehicle miles traveled.
- Investments in complete streets and urban greening can also contribute to reduced energy consumption through reduced urban heat island effect (see Energy section above).

Water: Stormwater capture, permeable surfaces, green infrastructure

- Investments in urban forestry and green infrastructure to capture and use stormwater through groundwater replenishment or onsite use for irrigation and other non-potable uses increases local water supply reliability and reduces demand on imported water. Reduced demand on imported water results in less conveyance of water from far distances. The conveyance and distribution of water across the state is one of California's largest sources of energy consumption.
- Investments in stormwater capture through urban forestry and green infrastructure can also contribute to reduced energy consumption through reduced urban heat island effect (see Energy section above).

Lastly, we strongly recommend that ARB take immediate steps to create investments, using cap and trade auction revenue, in urban forestry projects to showcase their emission reduction benefits, especially in disadvantaged communities. The ARB Cap and Trade Auction Proceeds Investment Plan supports investments in urban forestry, and we believe that early investments in urban forestry and urban greening projects could play a significant role in helping the state meet its AB 32 objectives.

Thank you for providing an opportunity for us to weigh in on this important policy.

Sincerely,



Nancy Hughes
Executive Director



Connie Gallippi
Program Director