



September 30, 2008

Chairwoman Mary Nichols  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

**RE: Draft Scoping Plan and Incorporating Urban Greening**

Dear Chairwoman Nichols,

On behalf of California ReLeaf, an organization whose mission is to empower grassroots efforts and build strategic partnerships that preserve, protect, and enhance California's urban and community forests. I would like to commend the Air Resources Board for their hard work and dedication in producing the draft Scoping Plan for the implementation of the Global Warming Solutions Act of 2006.

California ReLeaf works statewide to promote alliances among community-based groups, individuals, industry, and government agencies, encouraging each to contribute to the livability of our cities and the protection of our environment by planting and caring for trees.

I respectfully submit the following comments related to the Air Resources Board's draft Scoping Plan:

The Draft Scoping Plan briefly mentions urban forestry in the Sustainable Forests section of the Plan and the appendices; however, it does not include urban forestry or urban greening as methods for greenhouse gas emission reductions, with the exception of short mention of the carbon sequestration benefits.

Urban greening and urban forestry projects provide benefits in addition to carbon sequestration that result in greenhouse gas emission reductions. Urban forests reduce greenhouse gas emissions and conserve energy by shading homes and buildings. Urban forests also improve air quality by providing shade, which reduces urban heat island effects, sequestering carbon, and filtering air pollutants. Without counting these benefits, we are missing the largest contributing factors of urban forests to reducing greenhouse gas emissions.

Urban forests are a greenhouse gas emission reduction measure that can and should be used by multiple sectors, and they provide the potential for large amounts of reduced greenhouse gas emissions. Methods like these should be available to all sectors as options for reducing greenhouse gas emissions.

Protocols should be developed for the regulated markets that account for carbon sequestration,

energy conservation, water-related energy savings, and green waste energy reductions from urban forestry projects.

Local governments are the most likely sector to implement urban greening methods, because they see the value in all of the added benefits, including social and economic benefits, soil retention, water quality, recreation, open space, and more. If the Local Government sector were a regulated sector, there would be an incentive for local governments to exceed their target, not only to sell the credits, but to directly receive these additional benefits in their own community.

I would be happy to discuss these and other options with you. I am pleased to work with you to help find a solution to include the many benefits that urban greening and urban forestry provide to reducing greenhouse gas emissions and reaching the goals of AB 32, The Global Warming Solutions Act of 2006. I thank you for your leadership on this matter!

With Warm Regards,

A handwritten signature in blue ink, appearing to read 'M. Ozonoff', with a long horizontal flourish extending to the right.

Martha Ozonoff  
Executive Director