



November 13<sup>th</sup>, 2015

Ms. Shelby Livingston  
Cap and Trade Auction Proceeds Branch Chief  
California Air Resources Board  
Climate Investments Branch  
1001 I Street  
Sacramento, CA 95814

**RE: Second Three-Year Investment Plan for Cap-and-Trade Auction Revenues**

Dear Ms. Livingston:

On behalf of California's urban forestry non-profits and practitioners which are committed to greening our golden state and reducing greenhouse gas emissions, we are writing to provide comments on CARB's Cap-and-Trade Auction Proceeds Second Investment Plan Concept Proposal released October 27<sup>th</sup>, 2015.

The guidance and recommendations provided in this document will drive project and program investments that are critical to AB 32 implementation and meeting the State's GHG reduction goals. The vital role natural resources will play in helping to achieve these goals cannot be overstated. CARB recognizes this by providing a thoughtful and dynamic framework for investments in this sector.

With respect to how this Investment Plan addresses the role of urban forestry in the overall process of GHG reductions and benefits to disadvantaged communities, there is much to applaud here. As noted in the Investment Plan, "these benefits, including carbon sequestration, air filtration, community cooling, improved active transportation and recreation conditions, improved storm-water runoff, and water retention, can each provide incremental climate benefits." Further, urban forests can leverage opportunities that exist when integrating systems across sectors to obtain the deep reductions needed to achieve the State's long-term climate goals. Whether this is maximizing the energy savings potential of large canopy trees in urban environments, or supporting tree plantings along non-motorized trails as connectivity points that reduce VMTs in the transportation sector, urban forestry has a significant role to play in achieving multi-sector goals through cross-cutting investments. In fact, urban forests are one of very few investments that can contribute to GHG reductions through such an extensive suite of tools.

We also support the strong connection that CARB has highlighted between urban forestry and environmental justice, and we applaud recommendations to increase participation from DACs in the process by including additional funding & language to encourage technical assistance and outreach to those communities. As noted on page 46 of the Investment Plan, “urban forestry helps mitigate some of the environmental health burdens in disadvantaged communities.” Currently, \$15.6 million from the Climate Investments Program is being distributed to DACs across California to plant trees from as far north as Yuba City all the way down to National City near the Mexico border.

These investments all come with significant co-benefits that should be valued and taken into consideration when determining additional investments. CARB recognizes this in the Investment Plan and specifically notes “urban forests cool communities, reduce energy used to cool homes, and create comfortable conditions that encourage active transportation.”

Finally, we commend CARB for recognizing the complementary role green infrastructure projects can make to existing urban forestry investments, and creating a clear distinction between the two per the language used in Figure 15.

To clarify one recent point of confusion: contrary to the continuing comments of a small minority of conservation stakeholders, California has a program that is funding multi-benefit urban greening projects. It is called CAL FIRE’s Urban and Community Forestry Program, and, as noted in Table A-1, the Legislature and Administration have concluded that this Program is the logical conduit from which to distribute local assistance grants for tree plantings, parks restoration, bioswales, native plantings, community gardens and more. CAL FIRE’s six regional urban foresters are uniquely positioned to provide hands-on technical assistance to grantees, while the Urban Forest Act of 1978 provides CAL FIRE with the statutory authority to manage these investments. The 29 projects funded by CAL FIRE’s Urban and Community Forestry Program in 2015 – a third of which go directly to local governments – will address many of the needs highlighted in the Investment Plan with exclusive service for disadvantaged communities. In fact, the Investment Plan holds the program up as an example for others to follow, stating “community residents cite the Department of Forestry and Fire Protection’s urban forestry experts as a model – they offer substantial help in understanding and applying for grant funding.”

The Second Investment Plan appropriately leaves room to expand green infrastructure to sequester carbon and increase energy efficiency of the built environment. We support new investments such as this that could complement existing investments in CAL FIRE’s Urban and Community Forestry Program by not only supporting natural resource projects in rural and urban areas that are not being funded currently, but by connecting those investments to sustainable community strategies, regional climate action plans, or other relevant local government ordinances and actions that are advancing both AB 32 and SB 375 implementation. Such a program could be easily established and administered by the California Natural Resources Agency, which has demonstrated expertise in multi-faceted program management that includes river parkways and environmental enhancement and mitigation.

California has lost over 22 million trees to disease and the ongoing drought – prompting Governor Brown to call this “the worst epidemic of tree mortality” in the state’s modern history.

There is tremendous concern the number of trees lost will increase significantly during this period as the effects of the drought become even more evident. We have no time to waste in restoring our rural and urban forests through proper management and continued growth.

Achieving the State's mid- and long-term targets and goals will require pursuing innovative approaches that are either in the early stages of implementation, or have yet to begin. Urban forestry can contribute to this effort, as best evidenced by multiple projects currently funded by CAL FIRE. We strongly encourage continued investments in CAL FIRE's Urban and Community Forestry Program, and firmly believe these investments are needed now to provide DACs with urban trees and greenspace, and to help meet the 40% GHG reduction goals highlighted in Governor Brown's Executive Order from April, 2015.

We support CARB's vision of how urban forestry integrates into the larger mosaic of cap-and-trade auction proceeds investments and will provide truly transformative results in the years to come.

Thank you for the opportunity to provide written comments and for your leadership in reflecting the need for continued urban forestry investments over the next three years.

Sincerely,



Nancy Hughes  
Executive Director  
California Urban Forests Council



Chuck Mills  
Director of Public Policy and Grants  
California ReLeaf