CALIFORNIA ReLEAF

December 16th, 2016

Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Discussion Draft 2030 Target Scoping Plan Update

Dear Ms. Nichols

On behalf of California's urban forestry non-profits which are committed to greening our golden state and reducing greenhouse gas emissions, we are writing to provide comments on CARB's *Discussion Draft of the 2030 Target Scoping Plan Update* from December 2nd, 2016.

The recommendations provided in the *Discussion Draft of the 2030 Target Scoping Plan Update* will guide the State's efforts to increase climate resiliency within California's communities and maximize carbon sequestration opportunities through explicit strategies detailed in multiple sectors. The vital role natural resources play in helping to achieve these goals cannot be overstated.

With respect to how the discussion draft addresses the role of urban forestry in the overall process of contributing to GHG reductions and climate resilience, we greatly appreciate CARB's consideration of ambitious quantifiable goals within this sector (i.e. reducing the UHI differential by three degrees) and encourage additional quantification in the fields of forest health, wetlands, and agriculture.

Additionally, we support continued movement by CARB toward authentic integration of urban forestry and green infrastructure across other sectors. We believe the 2030 Target Scoping Plan Update can go even further by citing specific examples of how urban forestry can contribute to meeting our ambitious GHG reduction goals beyond carbon sequestration which is further detailed in this document.

Perhaps most importantly, we strongly applaud the work of the Environmental Justice Advisory Committee and many of the astute recommendations stemming from the Appendix document. In particular, we want to focus on the following under Natural and Working Lands, Agriculture, Waste:

3c. Achieve consensus on how to measure greenhouse gas emissions reductions from activities in natural systems.

California is currently investing millions of dollars in wetlands, forests, agriculture, urban forestry and other green infrastructure to support our state's ambitious GHG reduction goals. However, the quantification methodology applied to each of these sectors rarely (if ever) crosses over into another. As an example, the Sustainable Agricultural Land Conservation Program uses modeling equivalent to "avoided conversion" to calculate GHG reductions, yet that is not applied to the current draft guidelines for CNRA's Urban Greening Program, which specifically encourages protection of open space. Similarly, while reduced VMT's are eligible in CARB-approved methodology for the aforementioned Urban Greening Program, they are not allowable in the Urban Forestry Program – where a tree-lined streetscape will more likely encourage walking or cycling over a streetscape without green infrastructure. An increased opportunity to apply tried-and-tested tools across multiple sectors will significantly enhance opportunities to quantify and maximize GHG reductions in natural and working lands.

9e. Protect greenspace and expand it in disadvantaged communities.

As noted in the discussion draft and *Sustainable Communities Strategies and Conservation* (Livingston, 2016), "Some SCSs include policies, objectives or implementation measures relating to conservation and land protections, and urban greening." However, this is currently limited to a small minority of existing proposals, with little or no commitment to "provide services through green rather than additional built infrastructure wherever feasible." As noted in Livingston, we can further encourage greenspace conservation and expansion "where built infrastructure is necessary [by] providing a preference in the project selection system for projects that incorporate living roofs, bioswales, permeable pavement, expansion of the urban canopy, restoration of urban rivers and streams, extensive but drought-tolerant vegetation and other 'greening' features."

11. Integrate urban forestry within local communities.

There appears to unanimity between the State, the Legislature, the environmental justice community, and other stakeholders that we must continue to expand our urban forests, with a focus on increasing canopy equity in disadvantaged communities. This often translates into defining an enhanced urban forest by percentage growth, ranging from a 20% - 40% increase over the next 14 years.

While we agree more trees are needed in our urban environment (and across California), we must also recognize that this is only one facet of a multi-pronged solution to maximizing GHG reduction from our community trees and creating a sustainable urban forest. In order to truly integrate urban forestry within local communities, we encourage CARB to consider including the following strategies to the 2030 Target Scoping Plan Update:

- Include urban tree and greenspace maintenance, not just planting/creation. This EJAC recommendation, which is also captured in CAL FIRE's California Forest Carbon Plan Concept Paper, is essential. As noted in the CAL FIRE document, it is our existing urban forest that is sequestering up to 7.2 million metric tons/year, with another 1.3 million metric tons through avoidance. Mature trees are the number one carbon sequestration mechanism in our disadvantaged communities, and in California they are vital to contributing to our 2030 GHG reduction targets.

- Support improving the quality of our urban forests via the introduction and evaluation of seldom-used tree species to promote greater biodiversity and increased resilience. As California enters its sixth consecutive year of drought (which has claimed tens of thousands of urban trees over the last five years), we must adjust our urban tree planting palette to reflect 21st Century opportunities to increase community climate resiliency and to meet 21st Century threats like the polyphagous shot hole borer. One course of action might include supporting research, technology and education to facilitate a smooth transition from hydroscapes to xeriscapes to minimize catastrophic canopy loss from effects of drought and secondary stressors in communities.

- Explicitly integrate urban forestry across sectors to maximize potential to reduce GHGs and promote climate resilience. CNRA notes in *Safeguarding California* that we must "maximize use of trees and vegetation as infrastructure in cities for multiple benefits such as reducing energy use and improving storm water pollution and air quality." Indeed, 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 in climate resilience and adaptation. These strategies should be explored to their fullest potential within the 2030 Target Scoping Plan Update.

As noted in CARB's Draft Three-Year Investment Plan beginning 2016, "the potential benefits of forests located in urban area…are under-realized." The final document continues, noting "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." In fact, urban forests are only one of very few investments than can contribute to GHG reductions through such an extensive suite of mechanisms.

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.

California has lost over 102 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 maintenance and continued growth if we are to meet the 40% GHG reduction goals highlighted in Governor Brown's Executive Order from April, 2015 and truly create a climate-resilient California

Thank you for taking the time to review our comments, and for the tremendous effort exhibited by CARB and its staff thus far. We are proud to be partners in the state's effort to significantly reduce greenhouse gas emissions while also investing in our communities and the health of California's residents. We believe the 2030 Target Scoping Plan Update can be a tremendous resource to set that stage for decades to some.

Sincerely,

Chuck Mills
Director of Public Policy and Grants