



1007 General Kennedy Ave Ste I, San Francisco, CA 94129-1405

September 15, 2014

To: **The California Environmental Protection Agency (CalEPA)
and Air Resources Board (ARB)**

RE: **Comments to Air Resources Board on CARB's August 22, 2014 Draft**

Friends of the Urban Forest is a community-based urban forestry organization who plants and cares for street trees in all of San Francisco providing education and leadership in the best practices of urban forestry.

We are very excited to see such leadership in our State towards an extremely important goal we have created through AB 32 and SB 535. We believe that there has been amazing strides in our science in support of the value of urban forestry and do see healthy urban forests as part of our solution to reducing greenhouse gasses, sequestering carbon, decreasing the urban heat-island effect, improving water quality and saving energy.

Of concern at this time is the move toward changing the original draft having 55% of the funds passed through Cal Fire to be used for projects that provide benefits to Disadvantaged Communities to now be 100% benefiting these important communities. And, 55% of the Cal Fire funds be used for projects directly in Disadvantaged Communities to now become 100% of the projects. In our very diverse city of San Francisco we have communities right beside other communities that would simply not get the benefit of this funding to support urban forestry activities. We support increasing this percentage to even 70% while the remaining percentage is used for other urban forestry projects which would serve underserved portions of our city and help meet the goals of Cal Fire's *Urban and Community Forestry Program Strategic Plan*.

Of deep concern as well is the proposed change that none of these funds could be spent on tree care and maintenance or other proactive and sustaining activities (i.e. management and inventory) which will insure the health of the existing urban forest canopy. This existing canopy is currently providing huge ecosystem services and whose health oscillates with, in San Francisco's case, the relinquishment of City owned trees back to the property owners. Maintaining tree health in our urban environment is part of the complete picture when we look at urban forestry throughout the State.

We are amazed with the careful work Cal EPA has invested into the CalEnvironScreen 2.0 and see Method 6 (presented by the Bay Area Air Quality Management District on September 3rd, 2014 in Oakland) as the best way to more accurately reflect Disadvantaged Communities where all (19) of the indicators are multiplied together.

Please consider the overall impact to the entire existing and newly planted urban forest where even a portion of the funds be used for all of California's diverse population and unique urban and rural conditions again benefiting all of Californians. Using Method 6 for the CalEnvironScreen 2.0 would improve the distribution yet, it would not help all the diverse communities throughout the State and having a 70% to Disadvantaged Communities would be a fantastic 'floor' to begin our work throughout the State without missing the adjacent communities of need.

With much appreciation to the process that has been producing such great work, we gratefully submit our comments today,



Doug Wildman, Program Director

doug@fuf.net

Office: 415-268-0781

Cell: 415-694-3970