



Mr. Duane Shintaku  
 Deputy Director, Resource Management  
 California Department of Forestry & Fire Protection  
 P.O. Box 944246  
 Sacramento, CA 94244-2460

bay area *ecosystem* urban forest council

September 12, 2014

**RE: CalFire Urban Forestry Cap-and-Trade Funding FY14/15 and beyond**

Dear Mr. Shintaku,

We are writing on behalf of the California Urban Forests Council and our seven Regional Councils around the state.

We are very pleased that Urban Forestry has a significant role in the State's Cap-and-Trade expenditure plan for 2014/15 and beyond. Urban forests provide substantial benefits to reducing greenhouse gas emissions through direct carbon sequestration and energy conservation, while also reducing urban heat island, improving air quality, and providing many additional benefits to communities.

As we are now making decisions about how this program will be implemented, we have a few points and concerns to share.

Percentage of Funds to Disadvantaged Communities

While we are very supportive of SB 535 and a significant portion of the funds serving these disadvantaged communities, new information was shared at the end of August on the CalFire stakeholder call that 100% of the Urban Forestry funds would go to disadvantaged communities.

Prior to this new information being shared, the Air Resources Board put out guidance on August 22<sup>nd</sup> stating \$10.5 million (or 55%) of the Urban Forestry funds would be dedicated to disadvantaged communities, and in past budget discussions 70% was proposed. We are supportive of both of these approaches and both would allow CalFire to meet or exceed the requirements of SB 535.

We are concerned about this new 100% approach, as it constrains the program significantly to require all urban forestry projects to meet these requirements, especially without knowing the specific approach for defining disadvantaged communities, or what is considered "benefitting" a disadvantaged community, as both are still under consideration at ARB and EPA. If 100% of the funds must be spent for disadvantaged communities, which are yet to be defined, some communities that are nevertheless underserved will be left out. There are many examples in the Sacramento area, Bay Area, and southern California where this is the case.

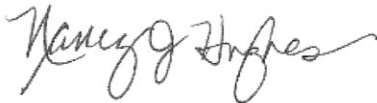
Management and Maintenance of the Existing Canopy.

Additionally, if funds are being focused in disadvantaged communities, there is an existing need to maintain the existing canopy, which will only be magnified by cap-and-trade investments. Our existing urban canopy currently sequesters 75-100 times the amount of carbon that 300,000 new trees would provide at maturity.

It would not be prudent or a wise use of funds to let our mature canopy decline while planting hundreds of thousands of new trees. We believe it is important to include funding in the Urban Forestry program guidelines for management and maintenance of standing urban trees with strategic and focused outcomes. There are ways to help with this issue, such as reduced matching funds over a period of time, which would not create a dependence on state funds. We need both new trees and our existing canopy to have a successful outcome for all involved and to ultimately to reach our AB 32 goals.

We would be happy to discuss any of this further. Thank you for your leadership and consideration.

Sincerely,



Nancy J. Hughes  
Executive Director

**In collaboration with:**

Bay Area Urban Forest Ecosystem Council  
Central Coast Urban Forests Council  
Inland Urban Forest Council  
Sacramento Urban Forests Council  
San Diego Regional Urban Forest Council  
San Joaquin Valley Urban Forest Council  
Street Tree Seminar/Los Angeles-Orange County Urban Forests Council

Cc: Mr. Helge Eng, Assistant Deputy Director, Resource Management, CalFire  
Ms. Caroline Godkin, Deputy Director of Legislation, CalFire  
Ms. Cynthia Marvin, Chief, Stationary Source Division, CARB  
Ms. Shelby Livingston, Chief, Climate Change Program Planning and Management Branch, CARB