Ms. Claire Jahns
Assistant Secretary for Natural Resources Climate Issues
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Natural and Working Lands Discussion Paper for 2030 Target Scoping Plan Update

Dear Ms. Jahns:

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 the Natural and Working Lands Discussion Paper for 2030 Target Scoping Plan Update released March 17th, 2016.

The recommendations provided in this document will guide California planning efforts and infrastructure investments needed to meet the ambitious 2030 GHG reduction targets set forth in Executive Order B-30-15. It is especially noteworthy that the Executive Order proclaims "Natural infrastructure solutions should be prioritized."

With respect to how the Discussion Paper approaches the role of natural resources in the overall process of contributing to GHG reductions and climate resilience, there is much to applaud here.

Section 2's recognition that different natural resource investments will reduce GHGs in different ways is imperative for accurately capturing the full breadth of opportunities. A "one size fits all" model would likely not cover the non-sequestration benefits that are accrued through avoided conversion, stormwater management, local groundwater recharge, reduced vehicle miles travelled, and energy conservation. Thus, building consensus around GHG emission quantification methodologies is essential.

In addition, we absolutely applaud the overarching vision to increase the use of Green Infrastructure in urban areas. As you know, the Agency has submitted a Budget Change Proposal for a new Green Infrastructure Program which, when coupled with the existing Urban and Community Forestry Program at CAL FIRE, will afford opportunities for transformative investments in communities across California, particularly disadvantaged communities hit first and worse by climate change.

In regards to how Urban Forestry and Green Infrastructure are further detailed in Section 4, we believe this portion of the Discussion Paper is generally strong -- outlining quantifiable goals such as increasing urban tree canopy by 5% with a focus on DACs, and reducing the UHI differential by 3°F degrees between urban core and surrounding rural areas.

However, we encourage CARB and the Agency to consider two additional goals as follows:

- <u>Manage and maintain our existing urban forest in such a way that increases tree survivability, maximizes carbon storage and provides multiple co-benefits.</u>

This continues to be a critical issue area that is overlooked in Safeguarding California and is not addressed in the last Scoping Plan updates. While there is much talk of scaling up forest management,

we note that urban forests also need management. Drought and disease are increasing the baseline need to actively manage our urban forests to maintain healthy trees and avoid unnecessary losses of valuable mature trees. In LA parks alone, we've lost 14,000 mature trees in 12 months due to drought. Planting more urban trees is great but not enough. As the FCAT concept paper notes, we need to incentivize urban tree canopy maintenance and preservation to help projects achieve long-range climate, health and economic benefits. Mature trees are the number one carbon sequestration mechanism in our disadvantaged communities. And they are vital to California for contributing to our 2030 GHG reduction targets.

- <u>Support the planning, design and integration of urban forestry across sectors to maximize potential to support climate resilience and reduce GHGs.</u>

As CNRA notes in *Safeguarding California*, 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." Urban forests and related green infrastructure 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 forests have a significant role to play in achieving multi-sector GHG reduction goals. These investments can also provide incentives to regions and communities to integrate green infrastructure into appropriate planning mechanisms such as climate action plans, Sustainable Communities Strategies, and urban forest management plans.

Finally, we would urge the Board and Agency to remember and recognize the valuable role of nonprofits as partners in implementing the proposed vision. While they are not highlighted in the Partnerships discussion on Page 1, they are vital to success as they are often the conduit for community engagement. As one example, CAL FIRE's Urban and Community Forestry Program is supporting 29 projects with Greenhouse Gas Reduction Funds that will result in 38,000 new trees planted. 27,000 will be planted by nonprofits.
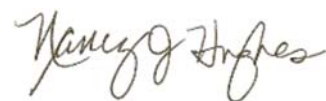
As the Administration noted almost a year ago, the 2030 GHG reduction targets established under the Executive Order are "the most aggressive benchmark enacted by any government in North America to reduce dangerous carbon emissions over the next decade and a half." The 2016 Scoping Plan update can serve as the roadmap to success. And the vital role all natural resources will play – forests, wetlands, parks, agriculture, desserts, open space, and urban forests -- in helping to achieve these goals cannot be overstated.

Thank you for the opportunity to provide written comments and for your leadership in reflecting the vital role urban forestry plays in safeguarding California.

Sincerely,

Chuck Mills   Nancy Hughes
Director of Public Policy and Grants   Executive Director
California ReLeaf   California Urban Forests Council