



August 31<sup>st</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: Concept Proposal for Second Three-Year Investment Plan for Cap-and-Trade Auction Revenues**

On behalf of California's non-profit urban forestry community which is 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 August 4<sup>th</sup>, 2015.

The guidance and recommendations provided in this document will drive project and program investments for the next several years that are critical to AB 32 implementation and meeting the

State's GHG reduction goals. The essential 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 Concept Proposal 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 proposal, "the potential benefits of forests located in urban areas—including carbon sequestration, air filtration, community cooling, improved active transportation and recreation conditions, improved storm-water runoff, and water retention—are under-realized." In fact, urban forests are only one of very few investments that can contribute to GHG reductions through such an extensive suite of tools.

We also continue to support the strong connection that CARB has highlighted between urban forestry and environmental justice. As noted on page 22 of the Concept Proposal, "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.

CARB notes on page 5 of the concept proposal, "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 a Green Innovations project currently funded by CAL FIRE. The project takes an ecosystem management approach to urban forestry by demonstrating how community planning and engagement supporting an optimally grown urban forest can function as highly productive "Green Infrastructure".

We also support CARB's recommendation for "Leveraging the 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. We are hopeful revisions to SGC's Affordable Housing and Sustainable Communities Program will address this issue directly and incentivize green infrastructure investments in subsequent grant cycles as one primary mechanism to achieve this proposed CARB recommendation.

Finally, as noted in Table B-1, the Legislature and Administration have concluded that CAL FIRE's Urban and Community Forestry Program is the logical conduit from which to distribute local assistance grants for tree planting and related activities. 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 concept proposal with exclusive service for disadvantaged communities.

California has lost over 12 million trees to the ongoing drought. There is tremendous concern the number of urban trees lost will only continue to increase during this period. We have no time to waste in restoring our urban forests. 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 green infrastructure, and to help meet the 40% GHG reduction goals highlighted in Governor Brown's Executive Order from April, 2015.

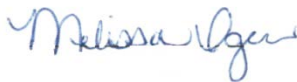
We support CARB's vision of how urban forestry integrates into the larger mosaic of cap-and-trade auction proceeds investments and believe these projects will provide truly transformative results in the years to come.

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.

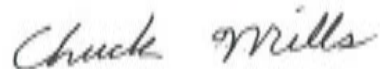
Sincerely,



Ray Tretheway  
Sacramento Tree Foundation



Melissa Iger  
Tree Foundation of Kern



Chuck Mills  
California ReLeaf



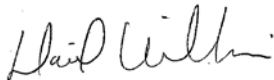
Jean Nagy  
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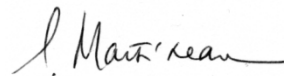
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Catherine Martineau  
Canopy



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Tree Davis



Rhonda Berry  
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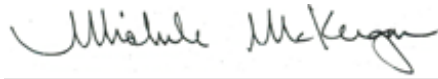
Darleen De Mason  
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Gail Church  
Tree Musketeers



Ken Knight  
Your Children's Trees



Michele McKeegan  
Keep Eureka Beautiful



Leo Buc  
Common Vision



Doug Wildman  
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Mark Kenyon  
North East Trees



Lee Ayres  
Tree Fresno



Bryan Tasse  
Tree Partners Foundation



Isabel Wade  
Just One Tree



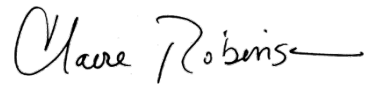
Laurie Broedling  
Tree San Diego



Lorraine Schmalenberger  
Friends of Balboa Park



Tina Marchetti  
Benicia Tree Foundation



Claire Robinson  
Amigos de los Rios



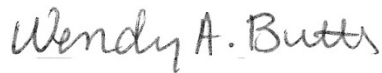
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