



April 11, 2014

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95184

Re: CA Urban Forests Council – Draft Proposed First Update of AB 32 Scoping Plan

Dear Ms. Nichols,

The California Urban Forests Council (CaUFC) and our seven Regional Councils statewide are writing in support of the Draft Proposed First Update of the AB 32 Scoping Plan. We appreciate the recognition of the role of urban forestry and green infrastructure in achieving the state's goals for reducing greenhouse gas (GHG) emissions. According to studies by the U.S. Forest Service, California's existing urban forests reduce GHG emissions by about 6.3 million metric tons per year through combined energy savings, reduced urban heat island effect, and carbon sequestration. Additional investments in urban forests can expand their benefit to meeting the goals of AB 32.

The Draft Proposed First Update of the Scoping Plan discusses urban forestry as part of the Natural and Working Lands Sector. We strongly support this inclusion and specifically the following recommendations outlined in the Plan:

- Local and regional plans fully incorporate and emphasize urban forestry, green infrastructure, and other natural resource and working lands conservation.
- Additional funding for urban forest programs that significantly reduce impacts to environmental justice communities through green infrastructure investments that reduce GHG emissions.

The Plan also recognizes the co-benefits of these investments beyond GHG reductions, including stormwater management, reduced energy demand, health and economic benefits, reduced heat island effect, job training, and more. We strongly support additional funding and suggest investments in the following existing programs with positive track records, experienced staff and technical expertise, significant applicant demand, and exhausted funds:

- CalFire Urban and Community Forestry Program
- Strategic Growth Council Urban Greening Program
- Local and regional funding programs for urban greening and sustainable development, including Complete Streets.

Investments in these programs would not only support implementation of new urban forest projects and green infrastructure, but also support the sustainable management of existing resources and new investments to ensure we maintain the carbon sink of the collective resource

as well as optimize and grow the benefits provided through a healthy and sustainable resource over time.

We appreciate ARB's support and the Administration's proposal to invest cap and trade auction revenue in urban forestry projects to demonstrate their emission reduction benefits, especially in disadvantaged and environmental justice communities. Early investments in urban forestry and urban greening projects can play a significant role in helping the state meet its AB 32 objectives while providing multiple benefits to the communities of greatest need.

Thank you for providing an opportunity for us to weigh in on this important policy.

Sincerely,



Nancy Hughes
Executive Director



Connie Gallippi
Program 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