



April 23, 2013

Ms. Shelby Livingston
Chief, Climate Change Program Planning and Management Branch
California Air Resources Board
Sacramento, CA 95814

RE: DRAFT Cap-and-Trade Auction Revenue Investment Plan

Dear Ms. Livingston:

On behalf of California’s urban forestry community comprised of the public, nonprofit and professional sectors across the state, we are writing to thank for the thoughtful and comprehensive public process undertaken to develop the DRAFT Cap-and-Trade Auction Proceeds Investment Plan. We are glad to see investments in urban forestry prominently featured in the draft plan. Urban forestry plays a significant role in meeting the greenhouse gas reduction targets set forth in AB 32 as well as meeting the mandates set forth in AB 1532, SB 535 and SB 375.

The California Department of Forestry and Fire Protection (CAL FIRE), within its existing Urban Forestry Program, is uniquely positioned to administer the investment of auction revenue proceeds for urban forestry projects. Under the authority of the California Urban Forestry Act CAL FIRE has administered several Urban and Community Forestry Grant Programs over the years with a demonstrated record of success. CAL FIRE has six regional urban foresters that work on the ground throughout California that are ready to deliver projects and technical expertise for them in our communities that reduce greenhouse gas emissions and provide myriad environmental and economic co-benefits. The DRAFT Plan recognizes the role CAL FIRE can play in administering these funds and providing oversight through existing programmatic processes.

Finally, we appreciate the discussion regarding accountability in Section X of the DRAFT plan. Projects resulting from the investment of Cap-and-Trade auction revenue must be backed by sound science and should be implemented with a level of transparency that ensures a net benefit to mitigating climate change.

Thank you for taking the time to review our comments. We are excited about future investments in projects that reduce greenhouse gas emissions while also investing in our communities and the health of California’s residents.

Sincerely,

Nancy J. Hughes
California Urban Forests Council

Robin Rivet
San Diego Regional
Urban Forests Council

Joe Liszewski
California ReLeaf