March 8, 2013

Ms. Shelby Livingston

Chief, Climate Change Program Planning and Management Branch

California Air Resources Board

Sacramento, CA 95814

Dear Ms. Livingston:

American Forests restores and protects urban and rural forests. Founded in 1875, the oldest national nonprofit conservation organization in the country has served as a catalyst for many of the most important milestones in the conservation movement, including the founding of the U.S. Forest Service, the national forest and national park systems and literally thousands of forest ecosystem restoration projects and public education efforts. Since 1990, American Forests has planted more than 43 million trees in forests throughout the U.S. and in 38 countries, resulting in cleaner air and drinking water, restored habitat for wildlife and fish, and the removal of millions of tons of carbon dioxide from the atmosphere.

As a national conservation organization with strong interests in urban and community forests, American Forests urges the California Air Resources Board to include urban and community forest projects as a critical component of any cap-and-trade revenue investment plan seeking to meet the goals of the state’s climate change legislation, AB 32. We view California’s efforts to implement AB 32 as leading the nation and demonstrating how national climate change policies and programs might be developed in the future.

California’s investment of cap-and-trade allowance auction revenues will be held to a high level of public and legal scrutiny, both at the state and national level. In addition to meeting the requirements of AB 32, for which the primary goal is reducing California’s greenhouse gas emissions to 1990 levels by 2020, investments will need to meet the requirements of other key laws, such as AB 1532, which dictates that funds shall also maximize economic, environmental, and public health benefits to the state and foster job creation as well as SB 535, which directs investment toward the most disadvantaged communities in the state. Urban and community forest projects meet these requirements very well. They represent a low-risk, high-return investment for California that will reduce GHGs, provide myriad co-benefits, create jobs, and aid disadvantaged communities while satisfying the high legal bar set for cap-and-trade revenue investments.

Urban and community forest projects are also attractive investments because California already has a staffed and appropriate program in place to implement these projects though the California Department of Forestry and Fire Protection’s Urban and Community Forestry Program which has a long, demonstrated record of success. In addition, there are dozens of public agencies, nonprofits, and community organizations statewide with specific expertise in creating and sustaining healthy, vibrant urban forests. Appropriate investments in urban and community forest projects now will immediately move California communities towards filling the 50 million vacant tree-planting sites that have been identified by U.S. Forest Service researchers and further strengthening the state’s existing urban forests which provide multiple benefits and enhance California’s quality of life.

In summary, urban and community forest projects speak to virtually every aspect of what is desired and what is required of legitimate and legal investments of California’s cap-and-trade allowance auction revenues. American Forests strongly urges you to include these projects in your cap-and-trade investment plan.

Sincerely yours,



Rebecca R. Turner, Esq.

Senior Director of Programs and Policy

American Forests