



November 1, 2013

Ms. Mary Nichols, Chair
California Air Resources Board
1001 I Street, Sixth Floor, Office 26
Sacramento, CA 95814

RE: Comments on 2013 Climate Change Scoping Plan Discussion Draft

Dear Chair Nichols:

On behalf of California ReLeaf and its Network of nearly 90 nonprofit organizations committed to on-the-ground urban forestry projects that meet the goals and objectives of AB 32, we are writing to applaud CARB's recognition of these resources as a valuable GHG reducer and carbon sink; and offer additional comments on the Draft Scoping Plan (hereafter referred to as the Plan).

Earlier this year, California ReLeaf joined Pacific Forest Trust, CalCAN, Trust for Public Land, and The Nature Conservancy in submitting joint comments to CARB regarding the Natural Resources sector which has been integrated into the Plan. Some of the broad-based recommendations appearing in that document have been alluded to within the Plan, as are some the specifics related to individual interests within the Sector, including urban forestry. In particular, we appreciate the discussion at the top of page 57 of the Plan which accurately details the tremendous benefits of urban forestry, and the body of peer-reviewed research which supports these conclusions.

In addition, there are multiple assertions made throughout the Plan which we also support. This includes the removal of forests from the GHG emitter table (page 21), recognition of the need to make better use of carbon sinks and sequestration tools (pages 75 and 79), and acknowledgement that "activities to enhance carbon storage... may require some time to fully realize carbon benefits." (page 100). The latter point is especially important in reference to the tremendous value forests and urban forests bring to GHG reductions through not only avoidance, but primarily through sequestration and carbon capture. Urban trees and new forest stands planted now will provide the highest and greatest long-term sequestration benefits at maturity, which is why existing urban forests and forest stands must be properly cared for and maintained now.

However, there are three major areas that the plan touches on which we believe should be further expanded due to their significance in helping to meet California's GHG reduction goals as follows:

- 1. Issue integration.** On Page 81, CARB asserts that "the current system of siloed planning and development responsibility among multiple state agencies... is not an effective model for the future." CARB goes on in page 83 to note "the transformation that is necessary to reach our climate goals will require a cohesive effort..." California ReLeaf strongly supports these assertions, and would encourage CARB to take a leadership role in such an effort, starting with systematic issues integration within the plan itself. While there is certainly logic to breaking up issue areas into individual sectors, there is also value to beginning what CARB believes must occur.

For example, the Plan recognizes the energy conservation benefits of urban forests, but does not integrate urban forestry into Key Recommended Actions for the Energy Sector. Much like the draft guidelines developed by the California Energy Commission that are currently being discussed for Proposition 39 implementation that includes tree planting as an energy efficiency tool, CARB has the opportunity to advance the discussion of issue integration by including recommended actions in appropriate sectors in which green infrastructure has a clear and recognizable role to play in meeting AB 32 objectives.

- 2. Co-benefits calculations.** Much like CARB asserts that siloed planning will not lead to success in reaching the state's GHG reductions target, siloed metrics for prioritizing project that focus solely on GHGs will not support other goals than be achieved simultaneously, such as implementing sustainable communities strategies, or bringing benefit to California's most disadvantaged communities. CARB is aware of this, and strongly emphasizes the need to account for co-benefits in project planning – both in the Final Investment Plan and in elements of this Plan.

We encourage CARB to play a leadership role here by incorporating a strategy for evaluating and calculating co-benefits. Whether it is the water quality and job creation co-benefits that working forest conservation easements and urban forestry bring to both rural and urban disadvantaged communities, or the VMT reductions that come with local parks, CARB can utilize a host of existing tools (i.e. i-Tree) to develop uniform standards and market infrastructure for monetizing ecosystem services and co-benefits across all sectors. As an example, The CEC has suggested a co-benefits multiplier in its discussion draft for Proposition 39 implementation that includes health benefits and air quality among others.

- 3. Assessing GHG reductions.** Page 103 of the Plan notes “all funding programs for investments in natural and working lands to achieve the Sector Vision should include provisions for monitoring, evaluation of program outcomes, and refinement of programs over time.” For over a year, the environmental community, in particular, has been advocating for utilization of uniform assessment tools *across all sectors* to accurately quantify and verify GHG reductions achieved through specific projects implementation. This perhaps is the most critical element of a successful strategy to ensure GHGs are being reduced through the projects being implemented. Some Sectors, such as natural resources, already have such tools for assessing and quantifying GHG reductions and carbon sequestration in urban trees and forest stands. Others are in development. Ultimately, all sectors will need uniform assessment tools that can accurately compare the GHG reductions from clean fuels technology to anaerobic digestion to revised RPS standards to natural carbon sinks in rural and urban areas.

Not surprisingly, CARB's AB 32 Environmental Justice Advisory Committee (EJAC) does an outstanding job of articulating very similar positions in their Initial Recommendations to Inform Development of the 2013 Update to the AB 32 Scoping Plan. Within this eight-page document, the EJAC makes the following recommendations (among others) that California ReLeaf applauds and supports:

- *The Air Resources Board (ARB) should collaborate with state implementing agencies to develop rigorous and consistent metrics for tracking, verifying, and reporting the economic, environmental, and public health benefits of AB 32 measures...*
- *ARB should lead implementing agencies in the development of rigorous and consistent metrics to measure the GHG reductions and co-benefits of GHG reduction programs using environmental, economic and health metrics. Such measurements of program accountability should be based on sound science.*

- *The Plan should place great attention and emphasis on and valuation of co-benefits such as reductions in energy consumption, air and water quality improvements, alleviation of the urban heat island effect, and public health.*
- *The Plan should encourage the creation and use of modeling and decision-making tools supporting optimal urban forestry and other green infrastructure configurations that maximize GHG reductions, sequestration, and co-benefits*
- *Implementation of projects should be supported by grants funded through the GHG reduction plan to community-based organizations administered through state and local agencies*
- *Investment of [cap and trade] proceeds into community-accessible GHG reduction programs should include low income energy efficiency, solar for low-income homes, transit operations and other low and no-carbon transportation alternatives, affordable transit oriented development and urban forestry and green infrastructure (including parks).*

The last two points, though not covered in the proposed recommendations from California ReLeaf, are exceedingly important, and compliment the concluding paragraph of Section VI within the Plan. *Funding should be focused on specific programs that can quickly and effectively support AB 32 objectives, provide for multi-year GHG reductions, institutionalize climate change into decision-making, and be consistent with the Investment Plan.*

For urban forestry, the Investment Plan recognizes The California Department of Forestry and Fire Protection (CAL FIRE), and its existing Urban and Community Forestry Program, as one of the preferred vehicles to deliver public funding for urban forestry GHG reduction projects. CAL FIRE's local assistance grant programs are highly competitive, and are governed by the Urban Forestry Act which explicitly states CAL FIRE shall provide "funding and other assistance for demonstration projects in urban forestry with special attention given to projects or programs assisting the state in meeting the requirements of the Global Warming Solutions Act of 2006 ..." (Paragraph (j), Public Resources Code Section 4799.12) Existing programs like this one, and others at the Wildlife Conservation Board, Department of Conservation, etc. can be quickly and effectively modified to administer the distribution of cap-and-trade auction revenues in the coming fiscal year to meet the goals of AB 32, AB 1532, SB 375, and SB 535.

The final 2013 Scoping Plan will be the document that drives state strategies for reducing GHGs far beyond 2020, and should include visionary recommendations to achieve such objectives. CARB is in a unique position to lead that vision by moving beyond strategy statements, and actually integrating some of the Board's suggested strategies into the final Plan.

Thank you for taking the time to review our comments, and for the tremendous effort exhibited by CARB and its staff thus far. 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. We believe the final Scoping Plan can be a tremendous resource to set that stage for decades to come.

Sincerely,



Joe Liszewski
Executive Director

Cc: Mr. John Laird, Secretary, Natural Resources Agency
Ms. Ann Chan, Undersecretary, Natural Resources Agency