April 8th, 2016

Mr. Russ Henly
Assistant Secretary of Forest Resources Management
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: California Forest Carbon Plan Concept Paper

Dear Mr. Henly:

On behalf of California's urban forestry non-profits and practitioners who are committed to greening our golden state and reducing greenhouse gas emissions, we are writing to provide comments on the California Forest Carbon Plan Concept Paper released earlier this year.

The recommendations provided in this document will guide California forest planning efforts and forest infrastructure investments needed to meet the ambitious 2030 GHG reduction targets set forth in Executive Order B-30-15. While it is important to recognize that the Executive Order proclaims "Natural infrastructure solutions should be prioritized," we must acknowledge that the primary source of carbon sequestration and carbon sinks will come from the State's forest and urban forests.

With respect to how the Concept Paper approaches the role of urban forests in the overall process of contributing to GHG reductions and climate resilience, there are significant strengths and a few missing links as follows:

Section I. PROTECT

As one of the very few state-level reports to explicitly highlight the need to protect our existing greenspace and tree canopy, we wholeheartedly applaud this goal and its inclusion in the Concept Paper. As noted in the document, it is our existing urban forest that is sequestering up to 7.2 million metric tons/year, with another 1.3 million metric tons through avoidance. Mature trees are the number one carbon sequestration mechanism in our disadvantaged communities, and they are vital to California for contributing to our 2030 GHG reduction targets.

Consequently, there must be a set of strategies in place to address how we protect these resources that are currently missing from the Paper. The six strategies suggested under the "Protect" section speak primarily to supporting new urban forests or connecting people to existing green space. We strongly recommend that the Forest Carbon Plan include specific recommendations about how we protect and maintain our existing urban forests. Such strategies should include sufficient fiscal resources to water, mulch, prune and otherwise properly manage these trees; and exploration of local tree ordinances and urban forest management plans that incentivize local governments to commit to the protection of these resources.

Section II. ENHANCE

We support the ambitious goal of increasing urban tree canopy by 5% over the next 14 years, which equates to roughly 10 million trees. Studies prepared by Dr. Greg McPherson and the U.S. Forest Service estimate that in addition to the 200 million existing urban trees, there are over 50 million viable

tree-planting locations currently available in California, so this goal is achievable with appropriate fiscal support.

We also strongly support utilizing CAL FIRE's Urban and Community Forestry Strategic Plan as a guiding mechanism to achieve this goal, and the recognition of CAL FIRE as the appropriate lead entity to guide our urban forest growth, health, and well-being. Currently, the state is investing significant revenues generated from Cap-and-Trade to support 29 projects through CAL FIRE's Urban and Community Forestry Program that are planting 38,000 trees over the next four years.

Our primary suggestion relates to the rest of the stated goal in this section, which includes "incentivizing urban tree canopy maintenance and preservation programs to help projects achieve long-range climate, health and economic benefits." We would encourage this is an appropriate strategy under the aforementioned "Protect" section, as it complements other recommendations identified there.

Section III. INNOVATE

The stated goal to "Support innovative urban forestry and greening projects that reduce GHG emissions, increase carbon sequestration, and provide other environmental, health, social, and economic co-benefits" is laudable, if perhaps a bit vague. But before that goal can move past simply tree planting and inventory activities, the state must work with stakeholders across multiple sectors to develop meaningful tools and templates to quantifiably measure GHG reductions that will come from these innovative urban forestry and greening projects.

The third strategy in this section alludes to this need, but does not explicitly dive deep into quantification. While we fully support "the design and implementation of innovative, multi-function urban greening projects that provide a wide range of carbon, climate, environmental, social, and economics benefits," they have little chance of producing measurable reductions without the tools to quantify beyond sequestration. This would include mechanisms for measuring reduced vehicle miles travelled (VMTs), avoided conversion of green space, and water-energy savings from capturing stormwater runoff and supporting local groundwater recharge. Much like urban forestry project research could yield recommended anti-displacement strategies (which we fully support), so could it yield critical methodologies for measuring additional GHG reductions.

As the Administration noted almost a year ago, the 2030 GHG reduction targets established under the Executive Order are "the most aggressive benchmark enacted by any government in North America to reduce dangerous carbon emissions over the next decade and a half." The Forest Carbon Plan can serve as the roadmap to success for maximizing the GHG reduction values of our rural and urban forests.

Thank you for the opportunity to provide written comments and for your leadership in reflecting the vital role urban forestry plays in safeguarding California.

Sincerely,

Chuck Mills
Director of Public Policy and Grants
California ReLeaf

Nancy Hughes
Executive Director
California Urban Forests Council