



March 17th, 2017

Mr. Ken Pimlott, Chair
 Forest Carbon Action Team
 1416 9th Street
 Sacramento, CA 94244-2460

RE: California Forest Carbon Plan

Dear Chief Pimlott:

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 released January 20th, 2017.

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 and SB 32. 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. Although California’s urban forests occur on only 5% of the state’s land area, they store and sequester 1.3% and 43.1% of the amount of CO₂ for all forests (rural and urban) combined, respectively. Hence, their health and resilience is extremely important to meeting the state’s GHG reduction targets.

With respect to how the Plan approaches the role of urban forests in the overall process of contributing to GHG reductions and climate resilience (Section 7), there are significant strengths and a few missing links as follows:

I. Threats

Section 7 of the Plan succeeds in identifying many natural threats to our existing urban forests, with much-needed emphasis placed on impacts from pests, disease, climate change and drought. As California moves forward in transforming our urban communities into a more climate resilient landscape, our trees and related green infrastructure will be well-positioned to play a critical role in that effort only if we swiftly and consistently respond to the aforementioned threats to these essential natural resources.

Included here must also be the recognition of other climate-related threats such as salinity and the increased use of recycled water, and higher winds increasing the number of higher heat days. Climate exposure for trees in the future, and its potential impacts, are directly pertinent to our urban forests, which are heavily stocked with temperate climate species in a landscape that is becoming increasingly xeric.

However, natural threats tell only half the story of the challenges confronting urban forests. Human-related threats are equally numerous and similarly threaten to substantially erode California's green infrastructure. These include, but are not limited to:

- In-fill development that results in loss of existing tree cover and little space for new plantings.
- Wildland-Urban Interface development that increases fire threats and loss of forest cover.
- Tree removals based on unwarranted liability concerns.
- Lack of resources for necessary management planning (i.e. master plans, inventories, policies and ordinances)
- Tree losses from vandalism, neglect and improper practices such as topping and over-thinning.
- Tree removals based on poor planting practices or improper species selection.

A comprehensive evaluation of both natural and human-related threats is warranted to more fully evaluate needs, opportunities and goals.

II. Benefits and Needs

Section 7 also succeeds in identifying the multiple benefits that come with a resilient, healthy urban forest. Almost weekly, new studies from across the world are connecting trees to improved human health, active transportation, reduced energy costs, and increased air and water quality. The Forest Carbon Plan recognizes these and other significant benefits ranging from local produce access to economic growth and vitality.

What's missing is a needs assessment.

For example, invasive pests are a serious threat to urban forests, as noted in the Plan. Consequently, there needs to be a coordinated monitoring and detection program in urban areas, with opportunities for citizen science and youth education.

In addition, the Plan asserts, in reference to trees removed for valid reasons, "the highest and best use should be sought for this resource, rather than viewing it as a waste product." However, urban biomass may not be the highest best use, as suggested. New policies are needed that incentivize and expand the use of urban wood and associated residue. Although there are some examples of successful programs that recycle trees into wood products, more are needed. Research that identifies the current supply of urban wood residue, its utilization rate and product demand is needed to estimate realistic impacts of urban wood products on CO₂ storage in the future.

On the subject of research, neither Section 7 nor Section 11 include urban forest research needs. This is an important omission, because research is a driver of innovation in urban forest management and education. As an example, tools that definitively quantify the GHG reductions associated with maintaining our existing mature trees are critically needed to demonstrate to CARB and other state decision-makers the need to invest resources, such as the GGFR, into proper maintenance and management of our mature trees most at risk from aforementioned threats.

Therefore, we strongly encourage augmenting Section 7 to include a needs assessment subsection that includes these examples and others as identified by CalFIRE, its partners, and stakeholders statewide.

III. Goals

The Plan effectively includes a set of four goals for urban forestry in the Executive Summary, two of which are reiterated in Section 7. With one exception, the goals are very general and, as written, may not advance the policy and practice of urban forestry in California.

Most of the goals speak to the need to use “program and policies” to achieve outcomes, or provide “resources and assistance” to local governments without fully fleshing out how this will be achieved and who the stakeholders are that will be primarily responsible for implementation. With so much riding on how our state’s urban forest will positively affect GHG reduction targets and other specific needs associated with green infrastructure, the Plan should provide an increased level of specificity that speaks directly to how goals may be achieved. This is especially critical for protecting the existing tree canopy, which we fully support.

One urban forestry goal that appears in both Section 7 and the Executive Summary does quantifiably step California closer to advancing a vision as follows:

By 2030, increase total urban tree canopy [UTC] statewide by one-third above current levels, to 20 percent coverage of urban areas.

Setting a statewide tree canopy cover goal, such as increasing UTC from 15% to 20%, is an attractive policy to promote planting and preservation of existing canopy.

However, it is worth noting that opportunities to create canopy are highly variable among cities, even within a climatic region and land use class. Canopy cover targets may be best developed for specific regions where local opportunities and constraints can be fully considered and take into account development densities, land use patterns, and new or existing ordinances.

Also, it is critical to note that setting canopy cover targets is one of many potential policies. Other policies should be aimed at improving the quality of the urban forest, such as age and species diversity, tree health, public participation and management planning, and addressing the Urban Heat Island, as discussed in Box 6 of Section 7.

With regard to the latter point, last year’s Concept Discussion Draft of the Forest Carbon Plan and this year’s current draft of the 2030 Scoping Plan Update, both suggest another quantifiable target that should be reintegrated into this Plan, as follows:

Reduce the UHI differential by 3°F between urban core and surrounding rural areas, versus current UHI impacts in major metropolitan areas, by promoting local and regional performance targets for mitigation of the urban heat island (UHI) effect and providing technical support for identification and implementation of urban greening, building and transportation policies, and programs to achieve it.

As noted in the Plan, this phenomenon results in higher temperatures, greater pollution and more negative health impacts during hot summer months. Numerous studies, coupled with data supplied in the plan itself, recognize the vital role of urban forestry and related green infrastructure in combatting this increasing human-health threat. This additional quantitative goal is both warranted and self-evident.

Conclusion

Our existing urban forest 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 and, improve the management and increase the health and longevity of our existing mature trees.

The Forest Carbon Plan, in particular Section 7 of the Plan, starts building that framework. As one of the very few state-level reports to explicitly highlight the need to protect our existing greenspace and tree canopy, we wholeheartedly support this goal and its inclusion. Similarly, we support several suggested management actions focused on creating canopy equity and incentives for use of best management practices.

We especially applaud the vision of moving green infrastructure solutions from being an exceptional occurrence to being a standard practice. Last week, the Strategic Growth Council unveiled proposed guidelines for the 2017 AHSC Program that include a recommendation directly pertinent to this point, stating "All projects must incorporate AHSC-funded greening components." It is with these visions in mind that we offer additional comments and suggestions that we believe will build a stronger, more resilient, green California.

As the Administration noted almost two years 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,



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