

September 3, 2014

Mr. Duane Shintaku  
Deputy Director  
Resource Management  
California Department of Forestry and Fire Protection  
1416 Ninth Street  
Sacramento, CA 94244-2460

Dear Mr. Shintaku:

On behalf of the hundreds of California communities that depend on a vibrant urban forest to improve their health and quality of life, we are writing to express concern over recent policies adopted by CAL FIRE regarding the expenditure of cap-and-trade funds within the Department's Urban and Community Forestry Program.

Specifically, we are concerned about comments made by CAL FIRE during the 3:00 pm conference call on August 28<sup>th</sup>, at which time participants learned that all 2014-15 urban forestry funds will go to disadvantaged communities. This is the first announcement of this sort and came as a surprise to all of CAL FIRE's urban forestry stakeholders, including California ReLeaf.

As CAL FIRE's website notes, in regards to the Urban and Community Forestry Program, "the program's mission is accomplished in cooperation with many groups including California ReLeaf..." We are a collective of over ninety nonprofits dedicated to greening our Golden State through urban forestry. California ReLeaf fought tirelessly over the last 20 months to ensure significant cap-and-trade auction revenues went to CAL FIRE in the 2014-15 State Budget to support its Urban and Community Forestry Program – always with the understanding and support for the majority of these funds going to benefit disadvantaged communities as identified under CalEnviroScreen and SB 535.

However, this understanding and support was accompanied by the acknowledgement that there are numerous low-income/under-resourced neighborhoods across the state -- many with low tree canopy -- that do not fall within the top CalEnviroScreen brackets for DACs.

CalEnviroScreen seeks to identify the communities most sensitive to the effects of pollution while taking into account socioeconomic characteristics and underlying health issues. However, Network groups frequently work in vulnerable neighborhoods that are not captured by the existing algorithm. Areas like Sun Village, Castaic, Palmdale, or Lancaster in Southern California exemplify sensitive populations disproportionately burdened by pollution and low tree canopy cover. Del Paso Heights, in the Sacramento area, is a community with high poverty, unemployment, and health risks. Canopy covers only 13% of this neighborhood, while adjacent affluent neighborhoods have up to 52% canopy cover. Communities like Del Paso Heights or those in Southern California are examples of communities across the state that would currently **not** benefit from the available CAL FIRE Urban and Community Forestry Program.

There is no doubt that the work of the California ReLeaf Network in these communities advances the goals and objectives of AB 32 and AB 1532. Their work implements much-needed urban forestry projects that sequester carbon, reduce greenhouse gas emissions, and provide myriad co-benefits – all of which

can be measured and accounted for using numerous existing tools and methodologies. Under this newly-announced allocation, many Network groups will be unable to compete for any of the funds -- *even though their projects comply with and often exceed the statutory requirements of AB 32 and AB 1532.*

As advocates for social equity and environmental justice, we support SB 535 and the commitment to benefitting disadvantaged communities. As a network of nonprofits that work to ensure California's entire urban forest continues to thrive, we believe there are communities across the state that will be denied even the *opportunity to compete* for urban forestry funding under the current arrangement. With urban forestry bond dollars exhausted and the prospect of new urban forestry dollars from the next water bond virtually non-existent, this is the time that all California communities need CAL FIRE's Urban and Community Forestry Program to deliver on its promise to "improve the quality of life in our urban environments" – whether disadvantaged, underserved, or simply in need of more trees.

As Director Ken Pimlott notes in CAL FIRE's Urban and Community Forestry Program Strategic Plan, "the simple fact that almost 95% of Californians live in urban areas speaks volumes to the importance of our state's urban forests." Actions taken by CAL FIRE to focus the only source of statewide urban forestry funding exclusively on one defined segment of these urban areas sets a difficult precedent for years to come.

For these reasons, we encourage CAL FIRE to recognize the efforts made in all parts of the state to advance the goals of the CAL FIRE Strategic Plan, AB 32, and AB 1532. Looking to Fiscal Year 2014-15 and beyond, we request that the majority of urban forestry grant funds allocated through the Greenhouse Gas Reduction Fund continue to benefit disadvantaged communities, but with a portion available for competition through the Urban and Community Forestry Program to ensure that everyone in the State is being served.

Sincerely,

Cc: Mr. Helge Eng, Assistant Deputy Director, Resource Protection and Improvement, CAL FIRE  
Ms. Caroline Godkin, Deputy Director, Office of Legislation, CAL FIRE