

ERIC GARCETTI
MAYOR

December 5, 2016

Polly Escovedo
Bonds & Grants Unit Manager
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Ms. Escovedo:

I write in overall support of the Urban Greening Draft Guidelines and recommend to you the below commentary and revisions.

In Los Angeles, almost a third of our City's census tracts (190 out of 632) were ranked in the top 10% of CalEnviroScreen 2.0. In response, we set a goal to reduce that number by half in twenty years. Since setting that goal, we've secured over \$100 million in cap and trade funds for projects in our highest scoring neighborhoods. Given our City's eagerness to improve our most disadvantaged communities and reach our sustainability goals, we urge you to consider the following feedback on the CNRA Urban Greening Draft Guidelines.

Tree Size & Establishment

The guidelines stipulate that trees be no larger than 15 gallon (page 4 and 16). While we recognize the benefits to planting 15 gallon trees, we recommend this guideline be revised to account for additional challenges to establish trees in disadvantaged communities. We prefer to plant larger trees, such as 24" box, in disadvantaged areas to protect them from the demands of a dense urban environment, such as increased vehicle and pedestrian traffic, pollutants or vandalism, and help them reach full maturity.

From: Sadie Graham [<mailto:sgraham@bart.gov>]
Sent: Monday, December 05, 2016 10:37 AM
To: UrbanGreening@CNRA
Cc: Nicole Foletta; vmenott@bart.gov
Subject: Question re: Urban Greening Grant Program

Hello,

BART is hoping to put together an Application in coordination with some surrounding Cities/Counties to improve ped/bicycle access to stations and to improve the parking lot/public plazas with trees and other landscaping that also improves water quality and pedestrian comfort.

1. Our main question is what level of planning needs to be completed to receive funding; and can the grant funds be used to fund further planning/design and to pay consultants.
2. Does the 25% of grant funds for development projects include construction management costs during construction, or only pre-construction design/management. (construction management, safety monitoring, etc.).
3. Is there a percent for art required.

Thank you for the opportunity to submit questions. Would it be possible to schedule a call with someone from the Grant Program to discuss our project and its potential competitiveness. We have a great need, but given the fund limitations and extensive application, we would like to determine if we are a potential applicant before we dedicate the resources to prepare the grant request.

Thanks!

Sadie Graham
Project Manager - Sustainability
BART Planning + Development

From: Marla Schmalle [<mailto:mschmalle@yahoo.com>]
Sent: Sunday, December 04, 2016 11:23 PM
To: UrbanGreening@CNRA
Subject: Public comment for Urban Greening Grant Program

To those making decisions for the Urban Greening Project,

I am a woman living in Oakland CA who visits parks and wildlands in Alameda County and Contra Costa County every day. It is awesome that 80 million dollars has been set aside for trees and plants to beautify our urban areas, and to make a significant contribution to mitigating the effects of climate change.

In wilderness areas surrounding where I live native plant lovers have removed non native plants and replaced them with thousands of native plants. The result in almost all cases is areas with myriad of plastic flags marking where native vegetation has been planted, but no sign of any surviving plant. The exceptions are relatively small lovely patches where volunteers tend the plants like a garden regularly "weeding" anything else that comes up, and giving every manner of protective care.

Likewise, thousands of healthy trees formerly contributing to our environment have been cut leaving former forest areas covered with weeds. In a small percent of these areas redwood trees have been planted, but with one exception I know of which is in a canyon with 2 creeks and protection from the wind, and where ongoing care was provided for many years, the replacement trees have not survived.

Therefore I recommend you change the criteria for your grants from native trees and plants to trees and plants most likely to thrive and fulfill the goals of the Urban Greening Grant Program.

In some places native greenery may be desired and appropriate. But as we all know, there were comparatively few trees in our state in pre colonial times, and most of those that are surviving and healthy are not the best suited for street trees, or for growing quickly to sequester carbon and provide shade in hot climates.

Marla Schmalle
mschmalle@yahoo.com

From: klu7@lycos.com [<mailto:klu7@lycos.com>]

Sent: Sunday, December 04, 2016 10:10 AM

To: UrbanGreening@CNRA

Subject: Allow non-native trees and plants in the Urban Greening Grant Program

Dear California Natural Resources Agency (CNR),

I am writing to express concern that the definition of allowable flora provided in the Urban Greening Grant Program may preclude the use, promotion, and protection of species that will advance the purpose of environmental protection.

An urban environment is difficult for trees. We need to be able to tap the huge variety of trees from all over the world to find the ones that work as street trees and park trees, in all the different growing conditions in cities.

Please remove the restriction on non-native trees and plants in policy and grant-making.

Thank you,

Kathy Lu

SF, CA

From: Lisa Wayne [<mailto:lwayne352@yahoo.com>]

Sent: Friday, December 02, 2016 10:10 AM

To: UrbanGreening@CNRA

Subject: Oakland hills

Please do not remove the trees from the Oakland hills as planned. Non native or native, they do the job. Climate is changing. We need to keep the trees that thrive. Removal would leave a huge number of animals without homes. Where do they go?

Please do not allow the spraying of a carcinogen, Round up, for YEARS that will obviously kill off our bees, poison our children, animals and water.

Marin county just removed usage of these poisons. That must be applauded. I hope the Oakland Hills are as lucky.

Lisa Wayne

Sent from my iPhone



From: Gordon Piper [<mailto:rgpiper33@gmail.com>]

Sent: Saturday, December 03, 2016 9:13 PM

To: UrbanGreening@CNRA

Subject: Comments to Natural Resources Agency re Discriminatory Urban Greening Program Guidelines, and the Discriminatory Urban and Community Forestry Program Guidelines of the Natural Resources Agency's Department of Forestry and Fire Protection

TO: Urban Greening@Resources.CA.gov

Urban Greening Grant Program, c/o The California Natural Resources Agency, Attn: Bonds and Grants Unit, 1416 Ninth Street, Suite 1311, Sacramento, CA

FROM: Gordon Piper; Chair, Oakland Landscape Committee;

SUBJECT: Comment to Natural Resources Agency re Discriminatory Urban Greening Program Guidelines, and the Discriminatory Urban and Community Forestry Program Guidelines of the Natural Resources Agency's Department of Forestry and Fire Protection

DATE: December 3, 2016

I am writing to share comments and my strongest condemnation and objection to the discriminatory Urban Greening Program Guidelines issued by the California Natural Resources Agency, and also the continuation of the multiple discriminatory Urban and Community Forestry Programs and Guidelines for urban forestry programs issued recently by the National Resource Agency's Department of Forestry and Fire Protection (CAL FIRE), as well as the California ReLeaf 2016 Social Equity Tree Planting Grant Program – Round 2. All of these programs and Program Guidelines continue a pattern of egregious discrimination by the California National Resources Agency, CAL FIRE and the State of California, and California ReLeaf in the last three years based on considerations of race, color, national origin, ancestry, geographic location and income that blatantly violates the civil rights and constitutional rights of millions of California residents located in approximately 75% of California census tracts, and the requirements of: State and Federal civil rights laws and regulations; the Equal Protection clauses in the California and United States Constitutions; certifications made to multiple Federal agencies for complying with the nondiscrimination requirements of Title VI Regulations of the Civil Rights Act of 1964; the prohibition against preferential treatment based on race in public contracting and public employment contained in California's Constitution. This constitutes a continuation and expansion of systemic discrimination involving the actions of both State of California and Federal agencies involved.

The flaws in these Natural Resources Agency program guidelines and programs are extremely serious, involving government agencies as well as private sector recipients of government funding and

assistance in promoting and engaging in preferential treatment based on race with millions in public funds in employment and contracting involving greening and forestry programs that violates legal and constitutional requirements and undercuts the provisions in/enforcement of our civil rights laws and regulations at both the State and Federal levels, and adversely impacts the health and opportunities of millions of Californians in over 6000 census tracts.

My assessment and my comments and conclusions regarding these discriminatory programs and guidelines are based on more than a quick review of these programs or reading of these program guidelines. I have been doing research for approximately two years regarding the discriminatory actions and programs of the Natural Resource Agency's Urban and Community Forestry Program at CAL FIRE and similar discriminatory programs being developed and implemented in many other State of California agencies, often involving the inappropriate use of billions of Federal funds as well as millions of State of California funds.

By way of background in relation to my research and my experience in conducting investigations of discriminatory practices:

- I worked for 31 years for the State of California civil rights agency, the California Department of Fair Employment and Housing, in different capacities ranging from being an investigator, to supervising many investigators as a District office Administrator for the Department in Oakland, Sacramento and San Francisco, and serving as a Special Assistant to the Deputy Director.
- I conducted major investigations for the State's civil rights agency of major public and private employers;
- I had responsibilities for processing and investigating and resolving discrimination complaints and helping to enforce both State and Federal civil rights laws.
- I served also as a contract compliance officer for the City of San Diego and helped to develop and implement contract compliance programs in local government agencies to ensure nondiscrimination in construction, banking, and other industries.

I also gained special insights regarding discrimination involving the State of California, the Natural Resources Agency and its discriminatory urban forestry programs at CAL FIRE in the last 3 years after being advised first in 2014 by several CAL FIRE grant program managers in the Urban and Community Forestry Program funded by both the State of California and the U.S. Department of Forestry and USDA that the community based Oakland Landscape Committee that I lead in the Oakland hills couldn't qualify for a state and Federally funded urban forestry grant because of where I lived and that 100% of all of the \$18 million in state grants for urban forestry or tree planting in the Green Trees for the Golden State Tree Planting Grant Program were restricted to just so-called "disadvantaged communities" located in just 25% of California census tracts. I knew that this restriction violated the requirements of the State's Unruh Civil Rights Act that I had helped to enforce, and it caught my attention and caused me to research and to document in great detail in the last couple of years the clear violations of State and Federal civil rights laws involving CAL Fire, the Natural Resource Agency, other State of California agencies, and by many Federal agencies that I found were aiding and abetting this systemic discrimination in major State programs such as: urban forestry, greening, energy, water, housing, transportation, high speed rail, and many more areas.

Let me emphasize at the outset in my comments that our State and Federal Constitutions are supposed to ensure Equal Protection for all Californians and residents under our laws, and that government agencies don't discriminate. The prohibition against discrimination in California's Unruh Civil Right Act enacted in 1959 covers a variety of bases including considerations of race, color, national origin, and ancestry and also other bases not enumerated which may include geographic location or income. While government agencies aren't supposed to discriminate, I found in my research in the last 3 years here in California, that government agencies at all levels were in reality actively involved in growing systemic discrimination based on considerations of race, color, national origin, ancestry, geographic location and income in a lengthy series of government aided programs funded with billions of dollars in public funds.

For example, let's consider the actions of the Natural Resource Agency, CAL FIRE, the State of California, the U.S. Department of Forestry, California ReLeaf, and the U.S. Department of Agriculture that in the last 3 years have aided and permitted continuing violations in major urban forestry programs funded with millions of dollars in State funds supported by Federal funds the discriminatory restricting of 100% of urban forestry grant funds in CAL FIRE's Urban and Community Forestry Program to just 25% of California census tracts targeting low-income minority communities of color in so-called "disadvantaged communities for most grant funding, while redlining or excluding 6000 California census tracts and half of California Counties from being able to apply for and obtain grant funding.

This funding approach by CAL FIRE, the Natural Resource Agency, and the State of California and Federal agencies involved was discriminatory and limited 100% of the urban forestry funding to projects targeting benefits including most jobs to low-income minority communities of color in approximately 1993 California census tracts violated the requirements I believe of:

- The Unruh Civil Rights Act which prohibits arbitrary discrimination by business establishment including public agencies and private companies in the provision of services, privileges and advantages on various bases such as color, race, national origin, ancestry and geographic location, and many other bases not specifically enumerated;
- The California Constitution requirement for Equal Protection contained in Article 1, Section 7

that mandates that no person may be denied equal protection of the laws;

- The Equal Protection clause of the State Constitution and U.S. Constitution that are supposed to mandate that no person can be denied the equal protection of our laws, including our civil rights laws;
- California Government Code Section 11135 (a) which states that no person is denied the right to participate in or the benefits of a program receiving State assistance;

- The California Constitutional prohibition against preferential-treatment-based considerations

of race, color, national origin or ancestry in public contracting and public employment;

- California Resources Code Section 71110, which was enacted to ensure

fair treatment of all races and incomes in the implementation of

environmental legislation, programs and policies in the State of California;

- The California Fair Employment and Housing Act enacted in 1959 and Government Code Section 12990 that to ensure nondiscrimination in- The California Fair Employment and Housing Act enacted in 1959 and Government Code Section 12990 that to ensure nondiscrimination in employment practices related to employment, the provision of jobs or training.

The Federal laws, regulations, Constitutional provisions, and the certifications of compliance with the nondiscrimination requirements applicable to the receipt of Federal funding by CAL FIRE and the Natural Resources Agency that I believe are being violated by your State agencies include:

* The Civil Rights Act of 1964 and specifically requirements of both Title VI and VII;

*Title VI Regulations of the US Department of Agriculture (USDA) by CAL FIRE found in 7CFR Part 15, Subpart A;

* Title VI Regulations of the US Department of Interior by the Natural Resources Agency, found in 43 CFR Part 17;

* The assurance of compliance with Title VI of the Civil Rights Act of 1964 that the Natural Resources filed with the US Department of Interior in receiving Federal grant funding and assistance;

* The Equal Protection clause in the US Constitution; and

*The Civil Rights Restoration Act of 1987 that mandates that a recipient must ensure nondiscrimination in all of its programs and not just those covered by a Federal grant or contract, or receipt of block grant funding.

Each year CAL FIRE receives block grant funding from the Federal government supporting its Urban and Community Forestry Program and is subject to the requirements of Title VI of the Civil Rights Act of 1964 in relation to its grant programs and the requirements of the Title VI Regulations of the US Department of Agriculture. The Natural Resources Agency also periodically receives Federal funds from the U.S. Department of Interior in the form of grants. The receipt of these Federal funds obligates both CAL FIRE and the Natural Resources Agency brings both of your agencies under the requirements of the Civil Rights Restoration Act of 1987 for ensuring in all of your programs, and activities that there is no discrimination as covered in the Title VI Regulations of these Federal agencies. Based on my research

and review, I have found that neither the Natural Resources Agency's Urban Greening Program as outlined in your Guidelines or the CAL FIRE Urban and Community Forestry Program's three grant programs comply with the nondiscrimination provisions outlined in these Federal Title VI Regulations

For example, on page 8 of the US Department of Interior Title VI Regulations clarify that examples of discriminatory practices or services include "denial of a service or access to a covered program, as well as unequal services in a program. The Department of Interior further noted in relation to covered bases of discrimination such as race, color, national origin that prohibited discrimination can involve intentional or disparate effect issues that may include:

- (1) Any difference in the quality, quantity, or manner in which a service or benefit is provided;
- (2) Segregation in any part of a program or separate treatment in any manner;
- (3) Restriction in the enjoyment of any advantages, privileges, or other benefits that are provided by the program;
- (4) Different standards or requirements for participation or entry;... and
- (5) Use of criteria or methods of administration that would defeat or substantially impair the accomplishment.

I found in my review and analysis of the Natural Resources Agency Guidelines for the planned Urban Greening Program grant program that the drafted Guidelines appear to involve intentional discrimination and disparate effect.

The US Department of Agriculture Title Regulations similarly have broad listings of prohibited practices such as the following that I found might be applied to a review and analysis of the discriminatory provisions contained in the CAL FIRE Urban and Community Forestry Program Guidelines outlined in the recently issued program guidelines. The USDA Title VI Regulations note:

§ 15.3 Discrimination prohibited.

(a) General. No [person](#) in the [United States](#) shall, on the ground of race, color, or national origin, be excluded from [participation](#) in, be denied the benefits of, or be otherwise subjected to discrimination under any [program](#) or activity of the [applicant](#) or [recipient](#) to which these [regulations](#) apply. These [regulations](#) apply, but are not restricted, to unequal treatment in priority, [quality](#), quantity, methods or charges for [service](#), use, occupancy or benefit, [participation](#) in the [service](#) or benefit available, or in the use, occupancy or benefit of any structure, [facility](#), or improvement.

(b) Specific discriminatory actions prohibited.

(1) A [recipient](#) under any [program](#) to which [the regulations](#) in this part apply may not, directly or through contractual or other arrangements on the ground of race, color, or national origin:

(i) Deny an individual any [service](#), financial aid, or other benefit provided under the [program](#);

(ii) Provide any [service](#), financial aid, or other benefit, to an individual which is different, or is provided in a different manner, from that provided to others under the [program](#);

(iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any [service](#), financial aid, or other benefit under the [program](#);

(iv) Restrict an individual in any way in the enjoyment of any advantage or privilege, enjoyed by others receiving any [service](#), financial aid, or other benefit under the [program](#);

(v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any [service](#), financial aid, or other benefit provided under the [program](#);

(vi) Deny an individual an opportunity to participate in the [program](#) through the provisions of [services](#) or otherwise or afford him an opportunity to do so which is different from that afforded others under the [program](#) (including the opportunity to participate in the [program](#) as an employee but only to the extent set forth in [paragraph \(c\)](#) of this section).

(vii) Deny a [person](#) the opportunity to participate as a member of a planning or advisory body which is an integral part of the [program](#).

(2) A [recipient](#), in determining the types of services, financial aid, or other benefits, or facilities which will be provided under any such [program](#), or the [class](#) of individuals to whom, or the situations in which, such services, financial aid, other benefits, or facilities will be provided under any such [program](#) or the [class](#) of individuals to be afforded an opportunity to participate in any such [program](#), may not, directly or through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the [program](#) as respects individuals of a particular race, color, or national origin.

I found and documented in my research evidence supporting intentional discrimination in the selection of census tracts and communities to benefit “communities of color” and to ensure preferential treatment and affirmative action benefitting these communities of color related to considerations of race, color, national origin, ancestry, geographic location and income. There is also evidence that these so-called “disadvantaged communities” identified by CAL EPA disparately impacted a huge class of non-Hispanic Caucasians located in nearly 75% of California census tracts that were redlined and excluded from important benefits in the previous CAL FIRE Green Trees for the Golden State Tree Planting Grant Program. This disparate impact continues in the latest grant program guidelines promulgated by the Natural Resources Agency, CAL FIRE and California ReLeaf that try to target to the maximum extent possible benefits to just 25% of California census tracts where approximately 84% of the residents are ethnic minorities.

I also found in my research regarding many State of California programs funded with Greenhouse Gas Reduction Fund money such as those of the Natural Resources Agency, CAL FIRE and California ReLeaf that there was a deliberate attempt to promote economic benefits for primarily Hispanics, African American, Asians, Native Americans, and Asian Pacific Islanders

that was not consistent with statutory and Constitutional requirements requiring nondiscrimination.

Additionally, Cal EPA, the Natural Resources Agency, CAL FIRE, and California ReLeaf are violating the “fair to all races” and “incomes” mandates of the definition of environmental justice contained in California Government Code Section 65040.12 € that defined “environmental justice” to mean “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.”

Geographic location is also a basis of discrimination. The Unruh Civil Rights Act has been liberally interpreted by the California Supreme Court as applying to more than just the tradition bases covered under the Fair Employment and Housing Act (FEHA). The Supreme Court noted in the “Koire v. Metro Car Wash” decision (40 Cal.3d 27) that “The act is to be given a liberal construction with a view to effectuating its purposes. In “In re Cox” the decision of the California Supreme Court provided clarification that the list of explicitly mentioned categories is illustrative, that the classes that previously had been recognized as covered under the act remained covered, and that additional bases of discrimination can be covered as well, even if they are not specifically mentioned in the Act.

The Natural Resource Agency’s Urban Greening Grant Program Guidelines along with the discriminatory guidelines for Urban and Community Forestry grant programs in 2016 and in 2015 of CAL FIRE , as well as the California ReLeaf tree planting grant programs in 2015 and 2016, all follow the discriminatory guidelines of the California Air Resources Board for agencies administering California Climate Investments with State Greenhouse Gas Reduction Fund money. I found in my research that all of these agencies have received in the last few years Federal funds which make them subject to the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964 as well as the Civil Rights Restoration Act of 1987, which apply the nondiscrimination requirements to all of your agency programs and not just the program receiving the Federal funding.

While Federal agencies under the Obama Administration appear to have been actively aiding and abetting the violations of the civil rights and constitutional rights of millions of Americans in promoting preferential treatment of minority populations and low-income populations targeting benefits primarily to ethnic minorities in so-called “disadvantaged communities”, and in allowing many State of California agencies receiving Federal funding to ignore the detailed nondiscrimination requirements of Title VI Regulations of various Federal agencies, I believe that many State of California agencies such as the Natural Resources Agency and CAL FIRE may find in 2017 under the new Trump Administration and a new Attorney General that your agencies could face legal challenges in court and a potential loss of important Federal funds if you do not promptly eliminate the discriminatory features of these grant programs that promote preferential treatment in government contracting and government-supported employment targeting benefits primarily to 25% of California census tract targeting minority communities of color.

I believe that the recently passed SB859 is unconstitutional and will be challenged and overturned in court for violating the Equal Protection requirements in the California Constitutional and United States Constitution, and the nondiscrimination requirements contained in both State and Federal civil rights laws and regulations. I also believe that the Natural Resources Agency and CAL FIRE face potential liability in relation to violating the California

Unruh Civil Rights Act that bars arbitrary discrimination by public agencies. The giving of special preferences by the Natural Resources Agency, CAL FIRE and California ReLeaf to so-called “disadvantaged communities” targeting benefits primarily to minority communities of color in just 25% of California census tracts violates the Unruh Civil Rights Act, and also the certifications of compliance with Title VI of the Civil Rights Act of 1964 that your agencies make when accepting Federal funds. You are also in violation of the Civil Rights Restoration Act of 1987 and need to promptly eliminate the discriminatory features and preferences that are included in all of the grant program guidelines.

I found in my review of the various guidelines that special preferences and advantages were being provided in the screening of grant applications favoring so-called “disadvantaged communities” and that this violated many of the requirements of the Title VI Regulations of Federal agencies referenced above that your agencies are supposed to comply with, and that the special preferences and advantages disparately treat and disparately impact a huge class of millions of non-Hispanic Caucasians located in 75% of California Census tracts.

I found in my online research that the discrimination by public agencies and other recipients of state and federal assistance based on considerations of race, color, national origin, ancestry, geographic location and income is massive in scale. If you go back in American history the number of Americans whose civil rights and constitutional rights are being violated in a growing series of public programs here in California far exceeds even the number of slaves in the 1860’s in our country, where there were reportedly 3,950,000 slaves representing approximately 12% of the population. In California alone, a huge class of approximately 14 million non-Hispanic Caucasians is now being discriminated in relation to a number of major State of California assisted programs such as urban forestry programs under the Natural Resources Agency’s CAL FIRE department where 100% of the funding in millions of grants made in the last two years were restricted largely targeting low-income minority communities of color located in just 25% of California census tracts to received most benefits. Nearly 29 million Californians located in the 75% of California census tracts being denied important benefits in a series of major State-assisted programs are having their rights to Equal Protection under our laws and under the Constitutions in California and the United States effectively denied by the combined actions of many State agencies such as the Natural Resources Agency and your Departments that are discriminating in your grant programs and also forcing those that receive grants in many instances to violate provisions of the Unruh Civil Rights Act and the California Fair Employment and Housing by targeting benefits in a restricted manner preferentially to primarily benefit ethnic minorities in just 25% of California census tracts. This blatantly violates the Equal Protection clause in the California Constitution and United States Constitution, and also the requirements in California Government Code Section 11135 (a) that states:

No person in the State of California shall, on the basis
of race, national origin, ethnic group identification, religion,
age, sex, sexual orientation, color, genetic information, or
disability, be unlawfully denied full and equal access to the
benefits of, or be unlawfully subjected to discrimination under, any

program or activity that is conducted, operated, or administered by
the state or by any state agency, is funded directly by the state, or
receives any financial assistance from the state

The process for identifying the so-called “disadvantaged communities” utilized by many State of California agencies such as the Natural Resources agency and CAL FIRE relying on Cal Enviroscreen 2.0 was far from “race neutral”, and the Cal Enviroscreen tool has a disparate impact on a huge class of non-Hispanic Caucasian in California in the 75% of California census tracts, or some 6000 census tracts. This adversely impacts and discriminates against about 14 million non-Hispanic Caucasians or white Californians. According to a staff member in the Cal EPA Office of Health Hazard Assessment that developed the Calenviroscreen methodologies, race and color considerations were among those considered in the original work on the Calenviroscreen2.0 and the final Calenenviroscreen2.0 certainly has an adverse impact on Caucasian in 6000 of the 8000 California census tracts.

I believe that the Natural Resources Agency and its department such as CAL FIRE are discriminating in violation of the Unruh Civil Rights Act not only based on “geographic location” but on Calenviroscreen2.0 having a disparate impact on millions of non-Hispanic Caucasian located in the 6000 census tracts that were largely redlined and excluded from receiving grant funding and benefits based on considerations of race, color, national origin, and ancestry. The discriminatory preference embodied in the Calenviroscreen methodology essentially redlines or excludes most of the persons in 6000 California census tracts from receiving any benefits and equal access to the benefits of major grant programs such as the Urban Greening Grant Program and CAL FIRE’s Urban and Community Forestry Grant Programs that continues to try to maximize the percentage of grants and benefits targeting minority communities of color located in just 2000 of California’s 8000 census tracts.

Of the total populations living in the approximately 2000 census tracts identified as so-called “disadvantaged”, 64% are Latino, 16% are white (while Caucasian or white other than Hispanics make up almost 39% of the total population statewide); 9.5% Asian; 8.2% African American; 0.3% Native American; and 1.7% other or multiple ethnicities. Statewide persons of Hispanic or Latino origin made up only 37.6% of California residents in the 2010 census (14,013,719 out of 37, 253,956) but as the Cal EPA analysis revealed 64% of the Hispanic or Latino population in California resides in the so-called disadvantaged communities and a substantially larger percentage stands to benefit from the billions of dollars each year in these communities, while only about 10% of total white population in the 8000 California census tract would potentially benefit.

An analysis by Cal EPA of the fraction of racial/ethnic groups living in the so-called “disadvantaged” census tracts in Calenviroscreen 2.0 revealed: 2 in 5 Hispanics or 40% of the total Latino population lived there and would benefit; 1 in 3 African American lived in these census tract of 33% of the total African-American population and would benefit; 1 in 5 Native Americans or 20% of the total Native American

population would benefit; 1 in 6 or 1% of the total Asian population lived in these census tracts and would benefit; 1 in 7 or other/multiple ethnicities lived in these census tracts and would benefit;; while only 1 in 10 White or 10% of the total White population lived in these census tracts and would benefit. My analysis revealed the significant disparate impact upon non-Hispanic Caucasian based on the geographic discrimination being engaged in by the Natural Resources Agency and its Department such as CAL FIRE.

I found in my research in the last two years that external groups greatly influenced the SB535 and SB 859 legislative process and the designation of “disadvantaged communities” and the administering agencies’ implementation and provision of services, privileges and advantages in a discriminatory manner here in California.

There is a discriminatory intent related to considerations of race, national origin, ancestry, and color on the part of some specific public and private organizations to grant preferential treatment or engage in affirmative actions to benefit minority community residents located primarily in 2000 California census tracts having substantially higher percentages of Hispanics, African Americans, Asians and other ethnic minorities. CAL FIRE, the Natural Resources Agency, and the US Forestry Service have intentionally discriminated in the Green Trees for the Golden State Grant Program, and this discrimination would be perpetuated in the proposed Urban Greening Program Guidelines and Urban and Community Forestry grant program guidelines of CAL FIRE for the coming year by largely ignoring the violations of State and Federal laws and regulations and Constitutional requirements.

External groups greatly influenced the SB535 legislative process and designation of “disadvantaged communities” and the administering agencies’ implementation and provision of services, privileges and advantages in a discriminatory manner. I found substantial evidence that there was an attempt by these external groups to influence the public contracting by State agencies to provide preferential treatment in programs funded with GGRF funding to:

- (1) Create jobs by requiring implementing state agencies to adopt local/targeted hire policies in the use of these funds, and this would largely benefit “communities of color” predominantly made of Hispanics, African Americans, and Asians that were disproportionately represented in the 2000 census tracts identified by Cal EPA as disadvantaged communities;
- (2) Utilize both State cap-and-trade investments/GGRF funds along with leveraged Federal funds, to require “explicit standards for contractors” to maximize job benefits; and
- (3) Set “explicit goals for the quantity and quality of jobs created and the demographic and geographic distribution of workers, particularly those in entry-level jobs”: First, a minimum of 25%, then 35% in September 2014, and a goal of 50% as of February 2015. (25% in the interim guidelines at <http://www.publicadvocates.org/cap-and-trade-revenues-under-ab-32-and-sb-535>; 35% at <http://www.publicadvocates.org/document/comment-letter-by-members-of-the-535-coalition-sustainable-communities-for-all-coalition-th>; 50% at <http://apen4ej.org/breaking-climate-legislation-promises-to-benefit-communities-of-color/>)

There is direct and anecdotal evidence of a discriminatory intent on behalf of Public Advocates, the Greenlining Institute, and the affirmative action coalition/multiple coalitions

led by Public Advocates that greatly influenced the passage of SB535, the identification of disadvantaged communities, the funding of the urban forestry program with GGRF funding, and the preferential treatment and arbitrary discrimination in the provision of services, privileges, and advantages. These were far from “race- and ethnicity-neutral” in the factors related to the purpose of the legislation such as SB535 and AB 1532 and the 100% restriction for the urban forest funding for the Green Trees for the Golden State Tree Planting Grant Program. This program was intended to primarily benefit “communities of color” based on considerations of race, color, national origin, ancestry and geographic location in 2000 census tracts in a program that redlined primarily 6000 California census tracts with larger percentages/populations of Caucasian residents.

California voters in 1996 approved Proposition 209 that amended the California Constitution to include a new Section (Section 31 of Article I), which reads: *“The state shall not discriminate against, or grant preferential treatment to any individual or group on the basis of race, sex, color, ethnicity, or national origin the operation of public employment, public education, or public contracting.”* Proposition 209, as you are aware, was basically a California voter-approved ban on affirmative action in the areas such as university admissions, contracting or other public programs. Legal challenges to Proposition 209 have failed, and in 2014 the U.S. Supreme Court upheld the validity of a similarly-worded ban on affirmative action in the State of Michigan. As result of the Supreme Court’s decision, the only likely method for Proposition 209 opponents to get rid of the law would be a move to repeal it at the ballot box. However, online research revealed that in April 2014, Democratic leaders in the Legislature abandoned an attempt to repeal Proposition 209 by placing a constitutional amendment before voters in November 2014. So, Prop 209 continues to be in effect embodied in the language prohibiting preferential treatment now contained in the California Constitution.

I found in my online research that several organizations, including Public Advocate and the Greenlining Institute, among others, heavily influenced CAL FIRE, Cal EPA, the Air Resources Board, and other State agencies, and also strongly influenced the content of these Cal EPA /Air Resources Board requirements/guiding principles that mandated some additional discriminatory preferential treatment and affirmative actions in violation of the cited civil rights laws and the Constitutional prohibitions. The common link seems to be attorney Robert Gnaizda, founder of Public Advocates, who later worked as California’s Director of Health and Deputy Secretary for Jerry Brown; served as the co-founder and former General Counsel at the Greenlining Institute; and now is General Counsel at the National Asian American Coalition. The National Asian American Coalition is part of a major national coalition of Black, Latino and Asian American organizations, from faith-based to small business to non-profits including The National Hispanic Christian Leadership Conference of 40,000 Latino Churches, the leadership of the 5,000 African Methodist Episcopal Churches, the leadership of the largest Latino Chamber of Commerce and one of the largest pan-Asian American advocacy groups in the nation.

An article on the Greenlining Institute’s website states *“After SB535 became law, Greenlining worked with the SB535 Coalition to identify priority investment opportunities in communities burdened by pollution and poverty, and we participated in the Air Resources Board’s public process to develop the first triennial cap-and-trade investment plan for the Greenhouse Gas Reduction Fund (GGRF). This effort was successful. The ultimate Investment Plan ARB submitted to the legislature included many of the priorities identified by community leaders, such as low-income weatherization and energy efficiency, low-income solar power,*

sustainable freight and other low-carbon transportation, urban forestry, affordable transit-oriented development and support for transit operating assistance and transit passes for core riders.” Notably two of the top priorities for the SB535 Coalition were urban forestry funding program for CAL FIRE, and the low-income weatherization program of the California Department of Community Services and Development that allocated 100% of the funding to disadvantaged communities. Between the two programs, it was close to \$93 million, being allocated in a manner that discriminates in an arbitrary manner in providing services, privileges and advantages in violation of the Unruh Civil Rights Act.
(<http://greenlining.org/issues-impact/environmental-equity/cap-and-trade/senate-bill-535/>)

Gnaizda left the Greenling Institute to take on a position as General Counsel at the **National Asian American Coalition** (<http://www.naac.org/about-us/legal-team/>) which currently states: *“The National Asian American Coalition, with other partner nonprofits, hosts a legal team that advocates on behalf of communities of color and low-income consumers. Our attorneys engage in litigation before State and Federal regulatory bodies (including the California Public Utilities Commission, California Department of Insurance, and Federal Communications Commission, among others) to promote development in minority communities and expanded consumer protections.”*

In another letter written on March 8, 2013 to California ARB Chairman Mary Nichols and signed by **representative of the SB535 coalition** such as Public Advocates Managing Attorney Richard Marcantonio, Greenlining Legal Counsel Ryan Young, Asian Pacific Environmental Network Director Mari Taruc, and California Black Chamber of Commerce President Aubry Stone, **raised “color” considerations as a basis on the “Long-Term Priorities” for the ARB and State of California in making investments of GGRF funds** noting: *“Low-income and communities of color, who are the majority of California, can be the catalyst for the culture shift needed to ensure the success of our State’s climate programs. California investment in **their** (emphasis added) climate solutions is key to this shift and many of these efforts will require investments that may require further shaping of existing programs and new programs to meet these needs”*. The letter then went on to have the SB535 Coalition recommend 5 areas for near-term investments including its top two recommendation for CAL FIRE’s Urban and Community Forestry program, which as developed in early 2014 by CAL FIRE targeted 100% of tree planting funding to disadvantaged communities as defined in CalEnviroScreen2.0 that primarily benefited communities of color in 2000 of the 8000 California census tracts.

Gnaizda and Public Advocates had opposed Proposition 209 and the bar on preferential treatment in government contracting and government employment based on race that was approved by voters in 1996 that is now embodied in the California Constitution. The successful advocacy efforts of Public Advocates, the Greenlining Coalition, and the SB535 Coalition led by Public Advocates working with many minority community organization partners and many minority community legislators in Sacramento has resulted in the passage I believe of unconstitutional environmental laws such as the recently enacted SB849 and SB 535 that promoted maximizing benefits for minority communities of color in just 25% of California census tracts and violating Equal Protection provisions in the California Constitution and the U.S. Constitution and the nondiscrimination provisions of the Civil Rights Act of 1964. They also have influence the development of the discriminatory

California Air Resources Board Guidelines for Agencies administering California Climate Investments with State Greenhouse Gas Reduction Fund moneys, such as the Natural Resources Agency and CAL FIRE, which reads like a “how to discriminate manual” promoting preferential treatment in a long series of State administered grant programs and in promoting preferential treatment as a co-benefit mandating that public and private agencies seeking grants also discriminate in their hiring practices by targeting job benefits to so-called “disadvantaged communities” focusing on benefiting “minority communities of color”.

The Natural Resources Agency, CAL FIRE and California ReLeaf are discriminating and discouraging applications for grants by the discriminatory features or content contained in their grant guidelines that preferentially treat applications for projects located in or primarily benefitting so-called “disadvantaged communities. The Natural Resources Agency needs to promptly rescind these discriminatory grant program guidelines, and comply fully with their obligations under both State of California and Federal civil rights laws and regulations as summarized in my comments, as well as the Equal Protection clause in the California Constitution and U.S. Constitution, and the requirements in the California Constitution prohibiting preferential treatment in state contracting and state employment. I urge the National Resources Agency Director and General Counsel to seek assistance from the California Department of Justice and the U.S. Department of Justice in 2017 in ensuring that the grant guidelines of the Natural Resources Agency, CAL FIRE, and California ReLeaf comply fully with all State of California and Federal civil rights laws and Title VI Regulations of Federal agencies, and end the discrimination based on geographic location, income, race, national origin, color and ancestry resulting from the California environmental laws such as SB535 and SB 859, and to ensure full compliance with the prohibition against preferential treatment in government contracting and government employment required by California’s Constitution.

I request the Natural Resources Agency also train all of its staff regarding the requirements of State and Federal civil rights laws and regulations and the obligations that Agency employees have to ensure that its programs and policies comply fully with these laws and the Equal Protection requirements in the California and United States Constitution. The Agency needs to appoint staff with the necessary legal expertise and authority to end the discrimination in its grant programs and to help in developing programs that ensure nondiscrimination and comply fully with the Agency’s legal obligations under both State and Federal civil rights laws and regulations.

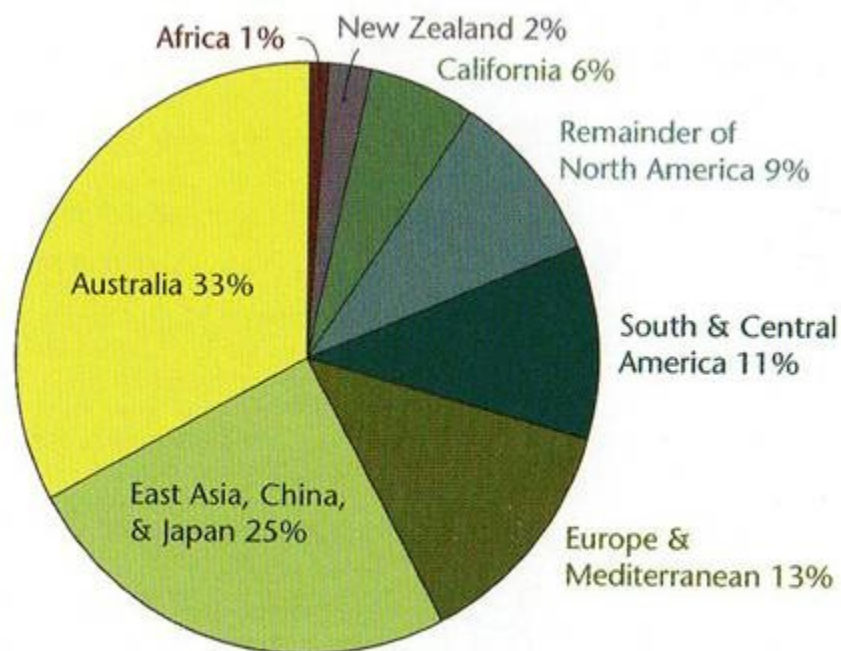
From: marymcallister@comcast.net [<mailto:marymcallister@comcast.net>]
Sent: Friday, December 02, 2016 12:16 PM
To: UrbanGreening@CNRA
Subject: Public Comment on Draft Guidelines for Urban Greening Program

**Urban Greening Grant Program
Public Comment**

Unfortunately, as presently drafted, the Urban Greening grant program will NOT increase California's urban tree canopies, increase carbon storage, or reduce air pollution because the program requires the planting of "primarily" native trees. As presently drafted the Urban Greening grant program will waste 80 million taxpayer dollars and squander an opportunity to address the climate change crisis.

Here are a few of the reasons why limiting trees to native species will not increase tree canopies in urban areas in California:

Many places in California were virtually treeless prior to the arrival of Europeans. Non-native trees were planted by early settlers in California because most of our native trees will not grow where non-native trees are capable of growing. According to Matt Ritter's *California's Guide to the Trees Among Us*, only 6% of California's urban trees are native to California:



Origins of California's Urban Trees

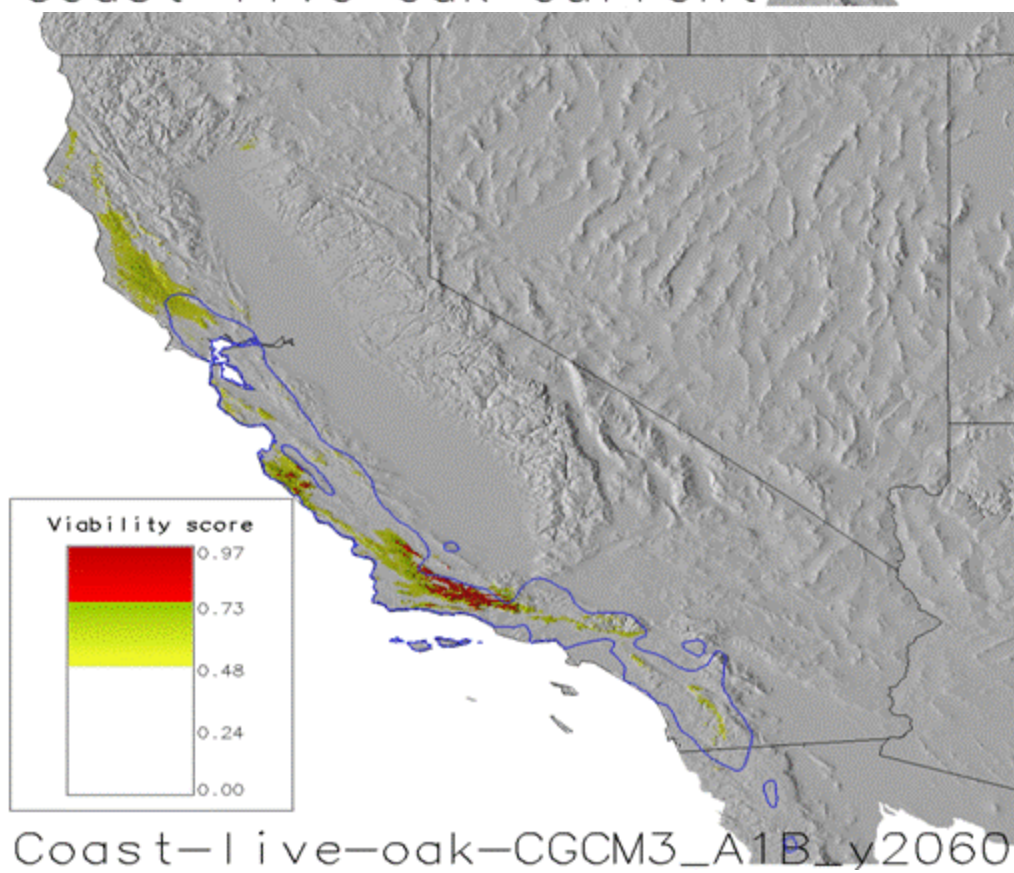
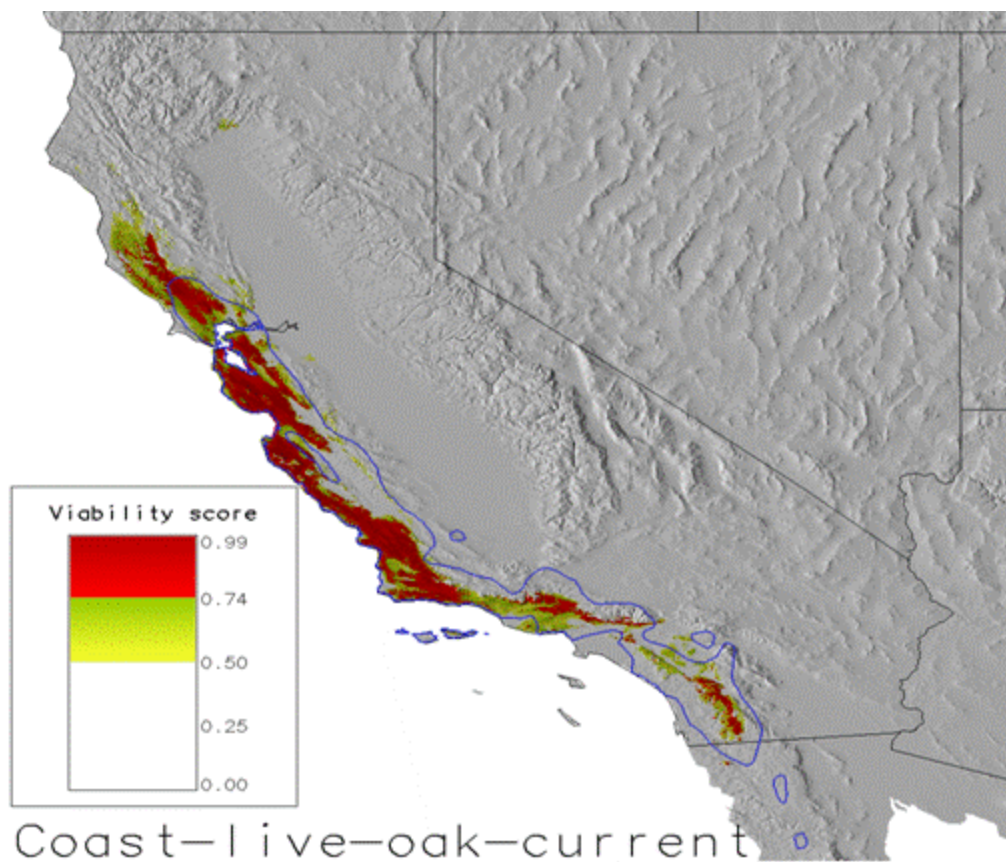
Draft guidelines for the Urban Greening grants refer applicants to the California Native Plant Society for their plant palette: <http://www.cnps.org/cnps/grownative/lists.php> (see page 24 of draft guidelines). If applicants use this as the source of their plant palate, they will find few trees on those lists. This is another way to understand that if you want more trees in California, most of them must be non-native.

Most California native trees are not suitable as street trees because of their horticultural requirements and growth habits.

- The approved list of street trees for the City of San Francisco includes no trees native to San Francisco. <http://sfpublicworks.org/sites/default/files/SF%20Street%20Tree%20Species%20List%202016%20Adopted.pdf>. There are many opportunities to plant more trees in San Francisco because it has one of the smallest tree canopies in the country (12%). The US Forest Service survey (<http://www.nrs.fs.fed.us/pubs/9660>) of San Francisco's urban forest reported that 16% are eucalyptus, 8% are Monterey pine, and 4% are Monterey cypress. None of these tree species is native to San Francisco. This photograph of Mt. Davidson in San Francisco in 1885 informs us that there were no trees in San Francisco before they were planted by early settlers:



- The approved list of street trees for the City of Oakland includes 48 tree species of which only two are natives. Neither seems an appropriate choice: (1) toyon is a shrub, not a tree and the approved list says it will “need training to encourage an upright form.” It is wishful thinking to believe that toyon can be successfully pruned into a street tree; (2) coast live oak is being killed by the millions by Sudden Oak Death and the US Forest Service predicts coast live oaks will be virtually gone in California by 2060.



Climate change requires native plants and trees to change their ranges if they are to survive. One of the indicators of the impact of climate change on our landscapes is that 107 million native trees have died in California because of drought, insect infestations, and disease. The underlying cause of these factors is climate change.

- 102 million native conifers on 7.7 million acres have died in the Sierra Nevada in the past 6 years because of drought and native bark beetles that have spread because winters are no longer cold enough to keep their population in check. Tree deaths in California in 2016 are double what they were in 2015. Millions more trees are expected to die in the near term future. <http://www.fs.fed.us/news/releases/new-aerial-survey-identifies-more-100-million-dead-trees-california>
- 5 million native oaks have died since 1995 because of Sudden Oak Death. A study of SOD by University of Cambridge (<https://www.sciencedaily.com/releases/2016/05/160502161111.htm>) said in spring 2016 that the SOD epidemic is “unstoppable” and predicted that most oaks in California would eventually be killed by SOD. The Oak Mortality Task Force reported the results of its annual survey for 2016 recently. They said that SOD infections increased greatly in 2016 and that infections that were dormant in 2015 are active again. This resurgence of the pathogen causing SOD is caused by increased rain in 2016. (http://www.suddenoakdeath.org/wp-content/uploads/2016/10/10.14.16_News-Release-SOD-Blitz-Results.pdf)
- Scientists predict that redwood trees will “relocate from the coast of California to southern Oregon” in response to changes in the climate. <http://www.natureworldnews.com/articles/17604/20151018/californian-redwood-relocation-earths-largest-trees-shift-northward-climate-change.htm>

These are the specific revisions that must be made to the draft guidelines if the Urban Greening Program is to achieve its stated goal of increasing California’s urban tree canopies:

Page 3: *“Examples of Ineligible Projects or Applications... Projects that primarily plant **non-native**/high or moderate water plants.”*

The word “non-native” must be deleted from this requirement because the nativity of a plant or tree is unrelated to its water requirements. There are many non-native plants and trees from similar Mediterranean climates that thrive in California and are very drought tolerant. Water requirements are a legitimate criterion for evaluating projects and applications, but drought tolerance is not limited to plants native to California.

Page 17: *“How will the project reduce energy consumption? Describe what elements will be incorporated. Energy saving measures may include, but are not limited to, constructing green roofs, planting trees to shade buildings, walkways, and spaces, and converting asphalt to **native** plants and/or turf.”*

The word “native” must be deleted from this sentence because native plants are not more capable of “saving energy” than non-native plants. Replacing asphalt with any plant—whether native or non-native—will reduce the absorption of light and heat by a dark, hard surface such as asphalt.

Page 24: *“Plant Palette – Provide Genus, species, common name, stock size (if known). For a list of local and regional California native plants in your project area, please refer to the California Native Plant Society website at <http://www.cnps.org/cnps/grownative/lists.php>.”*

Grant applicants will require far more resources to develop a plant palette that will meet the objectives of the Urban Greening Program because they will find few trees on the CNPS website and they will find few plants that tolerate shade. Since the primary purpose of the Urban Greening Program is to plant trees, most plants that will be planted with the trees must be shade tolerant. Since much of California was treeless, native plants in many urban areas in California require full sun.

Here are a few suggested resources that will be more useful to applicants in planning their plant palette:

“Urban Tree Database and Allometric Equations” is a recently published resource of the US Forest Service. It provides maximum tree size, growth data, space requirements for specific climate regions to help landscape planners select the most suitable tree species for available space. <http://www.treesearch.fs.fed.us/pubs/52933>

The *Sunset Western Garden Guide* is a comprehensive resource for plants in specific western regions, including many California microclimates. Water and light needs are specifically evaluated for every plant.

East Bay Municipal Utilities District, the supplier of drinking water in the San Francisco Bay Area has published *Plants and Landscapes for Summer-Dry Climates*.

There are undoubtedly many other useful resources for a climate-appropriate and drought-tolerant plant palette. If the grant guidelines cannot provide a more comprehensive list of resources it must delete the plant list of the California Native Plant Society because it is too restrictive and it misleads applicants into the misguided assumption that the goals of the grant program can only be achieved with native plants. In fact, the goals of the program cannot be met with exclusively native plants.

Page 38: “Sample Cost Estimate Budget Form...Materials...**Native Plants**”

The word “native” must be deleted in this budget form because the objectives of the Urban Greening Project cannot be achieved with exclusively native plants.

Page 43: “Grantee shall provide a planting palette demonstrating how **native**, low-water, drought-resistant vegetation will be used in the Project”

The word “native” must be deleted from this sentence because there are many non-native plants that are drought tolerant and do not require any more water than native plants. Requiring exclusively native plants is unnecessarily restrictive, particularly at a time of rapid climate change in which the ranges of native plants are radically altered from their location in 1769 when Europeans arrived in California. Unless the definition of “native” is revised to reflect changes in the climate, we cannot expect successful landscaping with exclusively native plants.

How do we know this? We witness failed “restorations” all over the State of California. In the San Francisco Bay Area we see non-native plants repeatedly eradicated. In the rare instances in which native plants are planted, they seldom last more than a few months. Native trees are sometimes planted and irrigated. They still fail about 50% of the time and more frequently when planted in microclimates to which they are not adapted.

In Conclusion

The purpose of the Urban Greening Grant Program is to increase carbon sequestration and reduce greenhouse gas emissions, primarily by expanding the tree canopy in urban areas. Therefore it is both inappropriate and counter-productive to require exclusive use of native plants and trees because carbon storage is unrelated to the nativity of plants and trees. Rather it is primarily a function of the size of the

tree and the hardness of its wood (e.g., eucalyptus stores more carbon than Monterey pine). The longer a tree lives, the more carbon it will store and the longer it will take to release its stored carbon when it dies and decays. These are appropriate criteria for evaluating applications for grants.

The fact that the draft guidelines are inappropriately biased in favor of native plants is a matter of some concern. If this bias originates within the Agency staff, it must be rectified by requiring the staff to learn more about the properties of carbon storage and the horticultural requirements of trees or hiring more staff with that expertise. If the bias originates from the influence of the California Native Plant Society, it must be rectified by inviting other non-governmental organizations to participate in the process of developing and implementing the grant program, such as arborist societies with more knowledge of trees.

Please do not waste this opportunity to address the climate crisis we face. Please do not waste the taxpayers' money on a program that will not increase our tree canopy or store more carbon.

Please understand that many grants have not been funded because the public opposes the unnecessary destruction of its healthy, non-native urban forest. The Agency should anticipate opposition to specific grant applications if they will not expand the tree canopy and if they propose to plant trees where they will not survive because they are not adapted to local conditions. Please spare us all that wasted money and effort by designing a program that will achieve the stated goals of the program.

Thank you for your consideration.

Mary McAllister

Oakland, CA

From: Bruce McAllister [<mailto:bzm@sonic.net>]
Sent: Thursday, December 01, 2016 10:39 AM
To: UrbanGreening@CNRA
Subject: Urban Greening Grant Program

Dear Public Servants:

I am writing this letter to the proposed plan to use funds earmarked to fight climate change to, instead, further the agenda of "native" plant advocates.

It makes no sense to kill trees that are sequestering carbon so that it does not form greenhouse gasses and replacing them with "native" chaparral, which holds far less carbon in its biomass.

It not only makes no sense to do this, but it seems impossible to accomplish. In no case that I have been able to find has a "restoration" been successful over time without huge expenditures or resources that, so far, no one has been willing to allocate.

These "restorations" also involve huge amounts of pesticides. Land managers are even advising their peers on techniques to apply them without being caught.

Removing these trees does not reduce fire risk or damage. Wild fire science clearly demonstrates that: A) Chaparral is much more easily ignited and spreads fire more rapidly than any land with a tree cover, and B) Eucalyptus is no more flammable than native species of tree.

Since these funds are specifically earmarked to fight climate change, I believe that it is both a waste and directly contrary to the mandate for which these funds were allocated. Please do not cave in to ideological extremism. That would be contrary to your role as a public servant serving all of the people, not just a small group of ideologues.

Thank you for considering the science of this situation, not just the beliefs of a small group of people with an agenda to push.

Bruce McAllister
bzm@sonic.net

From: Emily Benvie [<mailto:ebenvie@cityofarcata.org>]
Sent: Tuesday, November 29, 2016 2:25 PM
To: UrbanGreening@CNRA
Subject: Urban Greening Grant question

Good Afternoon,

I reviewed the Urban Greening Grant Guidelines (<http://resources.ca.gov/grants/wp-content/uploads/2016/09/Urban-Greening-Draft-Guidelines.pdf>) and I am wondering about the definition of 'Urban.' According to the guidelines, to be considered eligible, the project must

"5. Be located in an urban area. For the purposes of this program, an urban area is a geographic area designated or defined as urban by an applicable plan covering the project area, including, but not limited to general plans, specific plans, or community plans."

I'm wondering if the project is within an "Urban Cluster" as defined by the 2010 census would qualify. (<http://www.census.gov/geo/reference/ua/urban-rural-2010.html>) . The City of Arcata is trying to acquire a critical piece of land to add to our Community Forest. The Forest is within City limits, about a half mile from the center of the City, and is adjacent to Humboldt State University. However, being that it is the Forest it is planned and zoned for Natural Resources uses rather than urban uses. Would a forest acquisition in this case be eligible for this grant?

Also, has an application due date been determined? Thanks!

Emily Benvie
Environmental Programs Manager
City of Arcata - Environmental Services
ebenvie@cityofarcata.org

From: Margaret Hall [<mailto:sismhall1@aol.com>]
Sent: Tuesday, November 29, 2016 10:08 AM
To: UrbanGreening@CNRA
Subject: Draft: Urban Greening Guidelines

Friends,

I applaud efforts to mitigate climate change. However, I'm deeply concerned that your draft document is flawed and urge you to reconsider as follows:

1. Restricting plantings to "native" is going to seriously impede the planting of trees in urban areas. For example, most city tree programs succeed by choosing trees most adaptable and appropriate to the situation, regardless of their immigration status. City foresters arrive at a listing of "approved" trees based upon experience: i.e. which species co-exist well with sidewalks, utilities, streets, cars, pedestrians, buildings, etc. As far as I can tell, birds really like trees, regardless of the species.

2. It's ironic that this program is designed to mitigate climate change and yet, because of climate change, the idea of "native" trees is outdated thinking. In order to survive, many species of plants and animals will need to migrate even more than in the past. Think about it: what is the value of something being "native"? It sounds like a prejudice to me. The CNPS claims that native plants are better because they are drought tolerant, use less pesticides, promote biodiversity. The science supporting this broad generalization is weak. Of course, plants should be carefully chosen so that they are appropriate for local conditions. Why narrow the list to only "natives"?

3. We need trees to capture a lot of carbon. Significant numbers of "native" California trees are over stressed and threatened by drought, disease and insects. We'll have to welcome tree immigrants to our state if we want to have trees. Screened carefully, they have a lot to contribute. We can't afford to be stuck in our ways.

4. I noticed a reference to "restoration". Some native plant advocates take land and destroy existing vegetation with herbicides in order to start anew and plant "natives". This is crazy and I urge you to require disclosure by applicants of any plans to use herbicides. Do NOT fund these projects. They destroy soil health, along with plants and animals, and usually don't work anyhow.

Sincerely
Marg Hall
Berkeley Ca

From: Matthew Ramirez [<mailto:mramirez1201@icloud.com>]

Sent: Tuesday, November 29, 2016 10:06 AM

To: UrbanGreening@CNRA

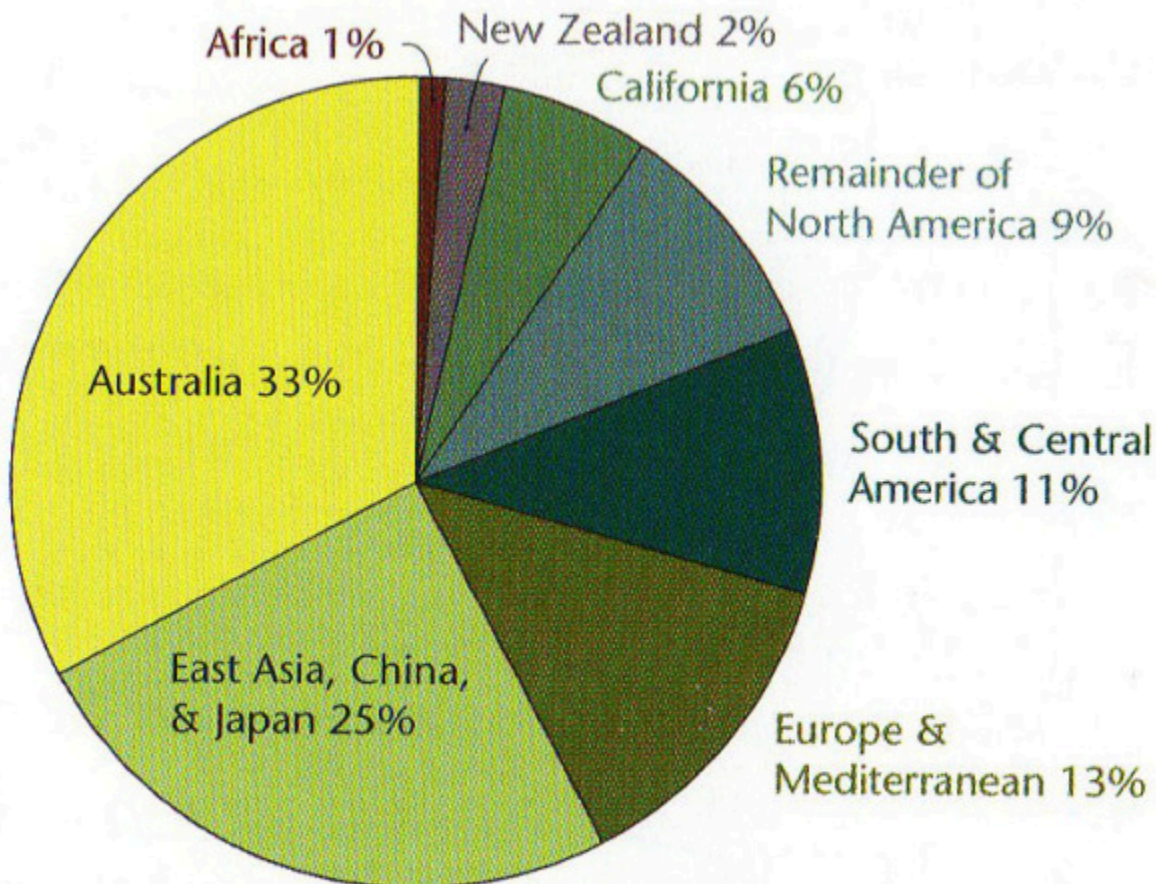
Subject: Urban Greening Grant Program Guidelines - Public Comment

Restrictions against planting non-native trees should be removed from grant guidelines in order to increase our tree canopies in California's urban environments, with careful and technical supervision.

-Matthew Elijah Ramirez, 11739 White Mountain Court, Rancho Cucamonga, CA 91737

"Here are a few of the reasons why limiting trees to native species will not increase tree canopies in urban areas in California:

Many places in California were virtually treeless prior to the arrival of Europeans. Non-native trees were planted by early settlers in California because most of our native trees will not grow where non-native trees are capable of growing. According to Matt Ritter's *California's Guide to the Trees Among Us*, only 6% of California's urban trees are native to California:

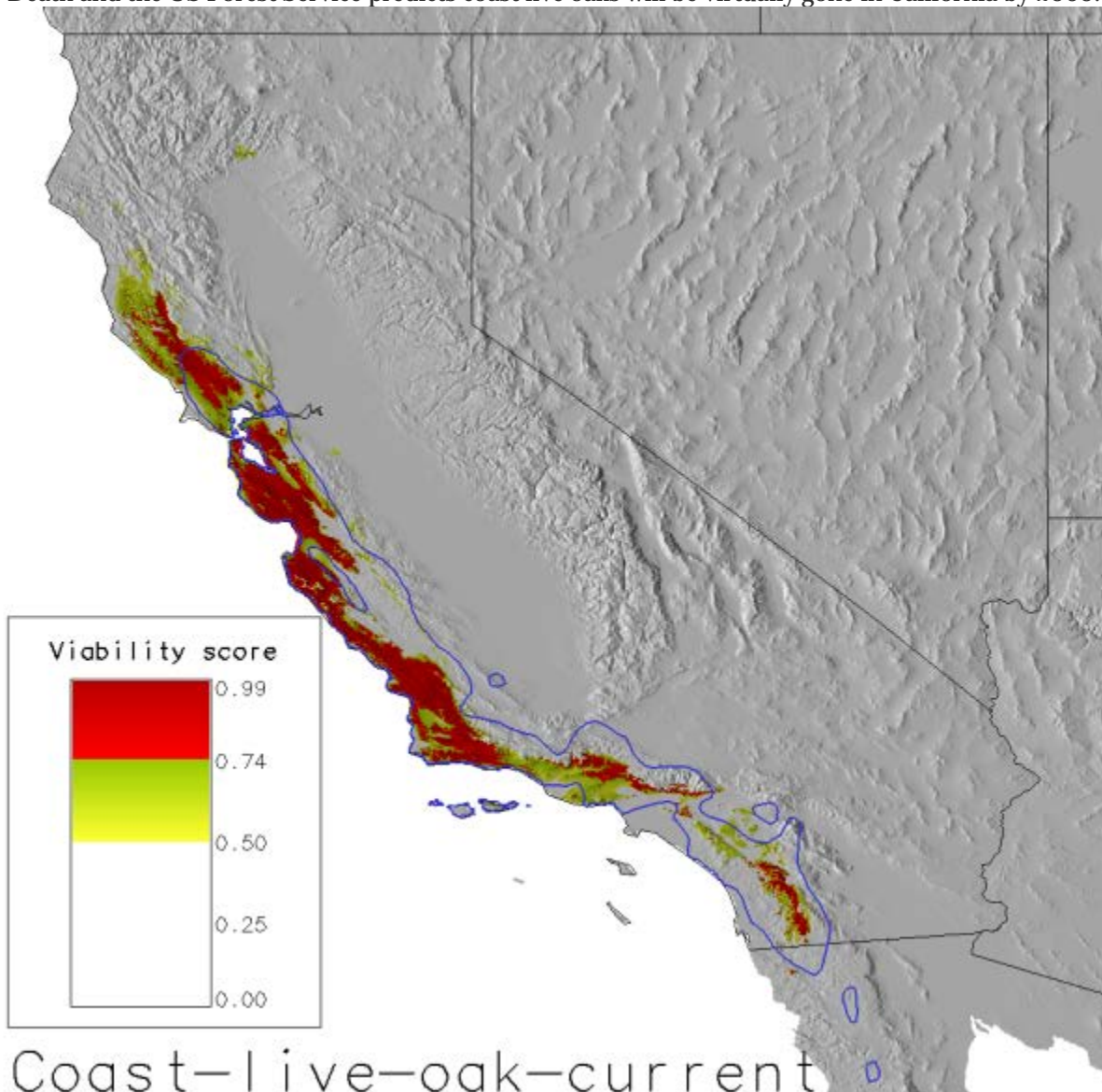


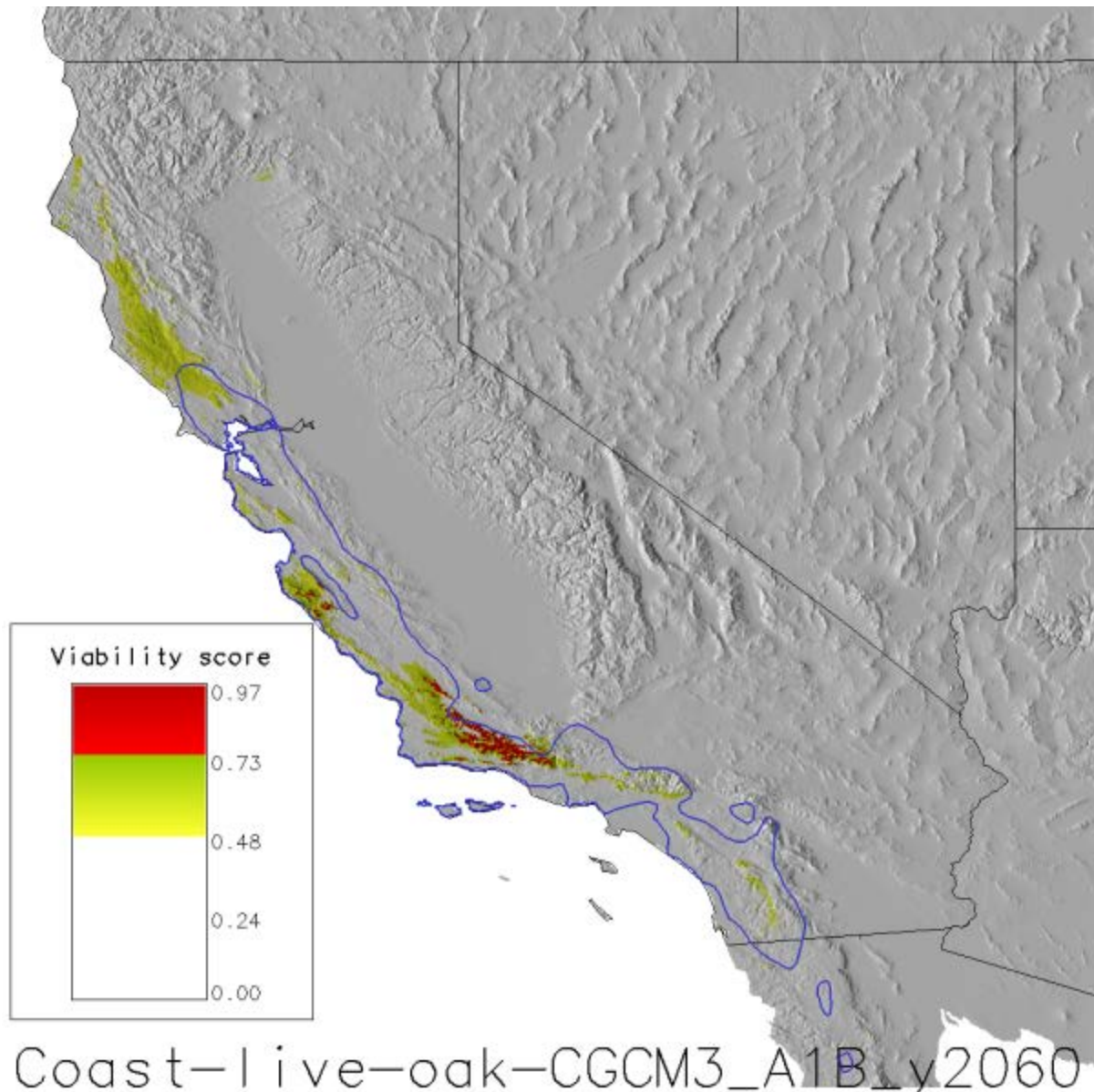
Origins of California's Urban Trees

Draft guidelines for the Urban Greening grants refers applicants to the [California Native Plant Society](#) for their plant palette (see page 24 of guidelines). If applicants use this as the source of their plant palate, they will find few trees on those lists. This is another way to understand that if you want trees in California, most of them must be non-native.

Most California native trees are not suitable as street trees because of their horticultural requirements and growth habits.

- The [approved list of street trees for the City of San Francisco](#) includes no trees native to San Francisco. There are many opportunities to plant more trees in San Francisco because it has one of the smallest tree canopies in the country (12%). The [US Forest Service survey](#) of San Francisco's urban forest reported that 16% are eucalyptus, 8% are Monterey pine, and 4% are Monterey cypress. None of these tree species is native to San Francisco.
- The approved list of street trees for the City of Oakland includes 48 tree species of which only two are natives. Neither seem appropriate choices: (1) toyon is a shrub, not a tree and the approved list says it will "need training to encourage an upright form." It is wishful thinking to believe that toyon can be successfully pruned into a street tree; (2) coast live oak is being killed by the millions by Sudden Oak Death and the US Forest Service predicts coast live oaks will be virtually gone in California by 2060.





Climate change requires native plants and trees to change their ranges if they are to survive. One of the indicators of the impact of climate change on our landscapes is that 70 million native trees have died in California because of drought, insect infestations, and disease. The underlying cause of these factors is climate change.

- **66 million native conifers have died in the Sierra Nevada** in the past 4 years because of drought and native bark beetles that have spread because winters are no longer cold enough to keep their population in check. **Update:** A new survey of California's trees now reports that 102 million trees are now dead. That's one-third of California's trees. 62 million trees died in 2016 alone, which is an accelerating rate of death. These trees are still standing and they pose an extreme fire hazard. These are NATIVE TREES being killed by a combination of drought and NATIVE BARK BEETLES.
- 5 million native oaks have died since 1995 because of Sudden Oak Death. A **study of SOD by University of Cambridge** said in spring 2016 that the SOD epidemic is "unstoppable" and predicted that most oaks in California would eventually be killed by SOD. The **Oak Mortality Task Force reported the results** of its annual survey for 2016 recently. They said that SOD infections increased

greatly in 2016 and that infections that were dormant in 2015 are active again. This resurgence of the pathogen causing SOD is caused by increased rain in 2016.

- **Scientists predict** that redwood trees will “relocate from the coast of California to southern Oregon” in response to changes in the climate.”

Source: <https://milliontrees.me>

From: Sawers, Brian J. [<mailto:brian.sawers@emory.edu>]
Sent: Monday, November 28, 2016 6:21 PM
To: UrbanGreening@CNRA
Subject: Draft Guidelines for the Urban Greening Grant Program

I am writing to comment on the Draft Guidelines for the Urban Greening Grant Program.

I would like to make two comments: 1) While the Draft Guidelines do mention pollen allergies, I believe the final guidelines should emphasize the importance of choosing trees that minimize allergenic pollen. 2) The Draft Guidelines do not mention biogenic emissions, which contribute to poor air quality.

The Draft Guidelines mention pollen allergies once. On page 18, "Decreased pollen and other allergens (i.e., allergy or asthma contributors)" is one of seven examples of a project benefit.

Grant applicants may not be aware that some trees produce highly allergenic pollen, while others do not. On page 24 and again on page 28 in Appendix B, the Draft Guidelines provide a link to the California Native Plant Society. The Society website does not tell which native plants produce allergenic pollen and which do not.

The Draft Guidelines do not mention biogenic emissions. Many plants emit volatile organic compounds (VOC), while other plants consume more VOC than they emit. Like other VOC, biogenic VOC combine with other pollutants (NO_x for example) in the atmosphere to produce smog and other secondary pollutants. Since some trees produce large amounts of VOC, while others consume VOC, choosing the right trees can have a large impact on VOC emissions and thus air quality. Many urban areas in California already suffer from poor air quality. Planting trees in urban areas that emit VOC might actually worsen air quality.

While the Draft Guidelines do not mention biogenic emissions, Appendix B on page 28 does provide a link to the Urban Forest Ecosystems Institute at Cal Poly. The website is identified as CALFIRE though.

UFEI provides a general description that includes both the allergy potential of some trees, as well as biogenic emissions. See <http://selectree.calpoly.edu/right-tree-right-place>.

More importantly, UFEI provides a directory of trees called SelecTree that includes information on both allergy and biogenic VOC. It is possible to search by a variety of characteristics, including allergy and emissions.

Since many grant applicants and potential grant applicants are unaware of the allergy potential of different trees and the air quality implications of planting certain trees, the final guidelines should highlight both issues. Even if the final guidelines do not require low allergy or VOC plantings, the guidelines can educate and inform. The guidelines can note the differences

between trees and provide direction on how potential grant applicants can research the allergy and VOC potential of different trees.

Thank you very much for soliciting input. I appreciate your time and consideration.

Brian Sawers
Scholar in Residence
Emory Law School

From: Doriel Lautt [<mailto:thelautts@msn.com>]

Sent: Monday, November 21, 2016 8:32 PM

To: UrbanGreening@CNRA

Subject: Add Non-Native Species in order to provide urban tree canopies to counteract global warming

Urban Greening Grant Program,
California Natural Resources Agency,
1416 Ninth Street, Suite 1311,
Sacramento CA 95814

Regarding the proposed Urban Greening Grant Program, I would like to offer some feedback. As a concerned citizen and also a student of horticulture, including California native plants, I believe the guidelines, as currently drafted, will not increase California's urban tree canopies, because the program requires planting of "primarily" native trees.

Draft guidelines for the Urban Greening grants refers applicants to the California Native Plant Society for their plant palette (see page 24 of guidelines). If applicants use this as the source of their plant palate, they will find few trees on those lists. This is another way to understand that if you want trees in California, most of them must be non-native. Most California native trees are not suitable as street trees because of their horticultural requirements and growth habits. Generally when selecting plants for a site, the considerations are: soil type, light, water requirements, etc. Limiting choices to native species will not work for many areas in California. If you want to increase the urban tree canopy to decrease greenhouse gasses and counteract global warming, you must allow non-native species in the guidelines. The California Native Plant Society website Native Plant List By Region is unacceptable. There are many links that do not work, and the lists are not categorized in a useable way. This website is a very poor resource for applicants wishing to come up with a list of trees to plant. Perhaps an excellent resource would be to include trees that are currently on the lists for urban tree planting in major cities such as San Francisco and Oakland, which include many non-native trees.

If you care about climate change, please create a grant program that will expand our urban forests and reduce the greenhouse gas emissions that are causing climate change. Restrictions against planting non-native trees must be removed from grant guidelines in order to increase our tree canopies in California's urban environments.

Sincerely,

Doriel Lautt

From: Jean Balibrera [<mailto:jean.balibrera@gmail.com>]
Sent: Thursday, November 17, 2016 9:49 AM
To: UrbanGreening@CNRA
Subject: Native trees

It is great that there is a California Urban Greening Grant Program. However, because it prohibits the planting of non-native trees, it will not be effective. It will not increase the tree canopy in urban areas in California. Most natives are not suitable as street trees because of their horticultural requirements and growth habits. Climate change requires native trees to change their range in order to survive. Please change the grant to allow non-native trees to be planted. It is not a substantial argument to prohibit non-native trees.

Thank you,
Jean Balibrera

From: avatar [<mailto:avatar2486@att.net>]
Sent: Sunday, November 13, 2016 8:22 PM
To: UrbanGreening@CNRA
Subject: native plant nonsense

In September 2016, the California Natural Resources Agency (CNR) started planning a grant program for Urban Greening. It sounds good at first: The money, 3/4 of which must be used in economically disadvantaged communities, is for planting trees to store carbon and to shade buildings. (It's also for bike paths and walkways.) Unfortunately, as it's drafted now, the Grant Program apparently only supports the planting of "native" trees. But many urban areas in California had no native trees - like San Francisco. Even where there are native trees, they don't work in urban conditions. The recommended street-tree list from Friends of the Urban Forest has no native trees on it at all. Over 90% of California's urban trees are from elsewhere - for the simple reason that native trees don't do well in urban environments.

An urban environment is difficult for trees. We need to be able to tap the huge variety of trees from all over the world to find the ones that work as street trees and park trees, in all the different growing conditions in cities.

Trees are a crucial part of our green infrastructure. They're the only practical way to reduce carbon that's already in the atmosphere. They help regulate water flows, reduce particulate pollution, and provide wind barriers, all of which can reduce the energy used to mitigate those problems. They're also habitat for insects, birds, and animals - and this is why we would prefer new plantings to be "organic." Trees that have been treated with systemic pesticides can be toxic to wildlife.

Restricting ourselves to native trees is like having no trees at all. Only a few pockets are suitable for native trees. Oak trees, which are native trees in much of the Bay Area, are dying of Sudden Oak Death. The disease is spreading from year to year, and planting more oaks only spreads it further.

Please remove the restriction on non-native trees and plants.
avatar

From: S. Polk [<mailto:sdpolk2000@yahoo.com>]
Sent: Tuesday, November 15, 2016 1:55 PM
To: UrbanGreening@CNRA
Subject: trees

Hello,

While I support the planting of as many trees in California as if possible the restrictions that a recent, law passed preventing non-native trees in that proposal is ludicrous and counter productive. The reasons for having more trees in California is sound; the ways of getting there are not.

Our cities (like San Francisco, my hometown) is filled with plants from all over the world. Our botanical garden honors them. People's yards are adorned with them. They express our diversity here. And they have adapted well, just like the NON-NATIVE HUMANS who live here. Surely, California lawmakers would not sign a bill only allowing NATIVE human species into San Francisco or the whole state for that matter (only native Americans).

Buildings, concrete, automobiles, paved roads, government institutions and the like are also NON-NATIVE and not original. Shall we also propose to only allow the native dirt and scrub canopy that used to cover California return to its natural condition prior to lawmakers making unsound rules and recover all our areas? In fact, we could abolish all vehicles which would surely help with our carbon dilemma and keep EVERYTHING native.

Leave the restrictions out of this new law. Plant trees but do not restrict them to native only. It doesn't make sense and it only hurts NON-NATIVE established communities and cities. (However, I am in favor of native species in our preserved areas so please, create MORE preserve areas so you can get your native-tree planting fix).

A community supporter of TREES, native and Non native,
S. Polk

From: Sarah Dominguez [<mailto:dominguezs@scag.ca.gov>]
Sent: Monday, November 14, 2016 10:19 AM
To: UrbanGreening@CNRA
Subject: Clarification re: "urban"

Good morning,

Thank you for your recent visit to Los Angeles to provide an overview of the Urban Greening Program. It is always so helpful to hear things in person.

You may have touched on this, so my apologies if I missed it, but how do you plan to interpret the "urban" requirement? This may have been the "you know it when you see it" comment. I know that most city plans do not say x area is urban and y area is suburban/rural. So are the guidelines intentionally broad to allow for communities to define urban in their own terms? And then we'll all know that areas labeled as "open space" or "agriculture" do not qualify.

Sarah Dominguez
Associate Regional Planner | Sustainability
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
E: dominguezs@scag.ca.gov

From: hoverd@sbcglobal.net [<mailto:hoverd@sbcglobal.net>]
Sent: Monday, November 14, 2016 9:54 AM
To: UrbanGreening@CNRA
Subject: Remove the Native Tree Requirement

The Urban Greening plan being put forth is a great idea. We need to encourage tree planting and preservation for many reasons. However, if the funding is restricted to natives, this program will not work. For example, having grown up in California I have seen how delicate many oaks are to habitat. Redwood trees too because of their need for cooler and wetter conditions are not suited to urban settings. Providing funding only for native trees needlessly and inefficiently restricts opportunities for vibrant healthy and effective urban trees.

Please see that the restrictions on non-natives is lifted. Help natives by helping urban forests be effective and let the most suitable trees be used regardless of origin.

David Hover
San Francisco

From: Janet Kessler [<mailto:jannyck@aol.com>]

Sent: Sunday, November 13, 2016 5:51 PM

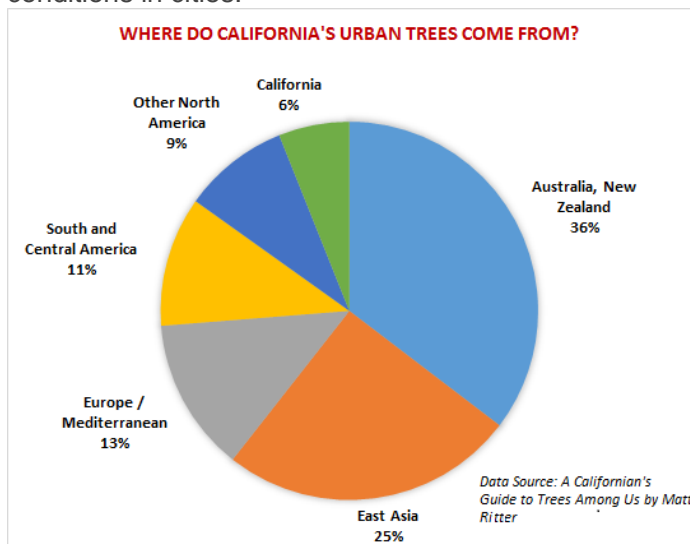
To: UrbanGreening@CNRA

Subject: Remove restriction on non non-native trees from your grant program, please!!

Dear Urban Greening Grant Program --

Over 90% of California's urban trees are from elsewhere for the simple reason that native trees don't do well in urban environments.

An urban environment is difficult for trees. We need to be able to tap the huge variety of trees from all over the world to find the ones that work as street trees and park trees, in all the different growing conditions in cities.



Trees are a crucial part of our green infrastructure. They're the only practical way to reduce carbon that's already in the atmosphere. They help regulate water flows, reduce particulate pollution, and provide wind barriers, all of which can reduce the energy used to mitigate those problems. **They're also habitat for insects, birds, and animals** - and this is why we would prefer new plantings to be "organic." Trees that have been treated with systemic pesticides can be toxic to wildlife.

Restricting ourselves to native trees is like having no trees at all. Only a few pockets are suitable for native trees. Oak trees, which are native trees in much of the Bay Area, are dying of Sudden Oak Death. The disease is spreading from year to year, and planting more oaks only spreads it further.

PLEASE REMOVE THIS RESTRICTION FROM YOUR GRANT PROGRAM!!

Thank you!

Sincerely,

Janet Kessler

Urbanwildness.com

From: Nathalie Paven [<mailto:npaven@earthlink.net>]
Sent: Sunday, November 13, 2016 3:53 PM
To: UrbanGreening@CNRA
Subject: Restriction of non-native trees

I'm writing to urge you to remove the restriction. It would be different (perhaps) if SF were still in it's original native state, but of course it has not been for over 150 years -- people have altered it completely. We desperately need more trees that will be able to survive automobile exhaust and increased particulate matter not to mention global warming so they can sequester carbon, provide habitat for birds and animals and make the city a better place to live.

Thank you for your consideration,

Nathalie Paven

From: Erin Caughman [<mailto:erin.caughman@att.net>]
Sent: Saturday, November 12, 2016 4:24 PM
To: UrbanGreening@CNRA
Subject: California's Urban Greening Grant Program:

Restrictions against planting non-native trees must be removed from grant guidelines in order to increase our tree canopies in California's urban environments.

Erin Caughman
erin.caughman@att.net

From: Dee Seligman [<mailto:deesel91@gmail.com>]
Sent: Friday, November 11, 2016 10:30 PM
To: UrbanGreening@CNRA
Subject: Comment to modify Urban Greening Grant Program

Restrictions against planting non-native trees must be removed from grant guidelines in order to increase our tree canopies in California's urban environments. Please revise your grant guidelines accordingly.

Dee Seligman

From: SF Forest [<mailto:sfforestnews@gmail.com>]
Sent: Saturday, November 12, 2016 11:27 AM
To: UrbanGreening@CNRA
Subject: Public comment on Draft Guidelines from SF Forest Alliance

Dear California Natural Resources Agency,

This is with reference to the Draft Guidelines for the Urban Greening Program. (<https://caufc.org/wp-content/uploads/2016/10/Urban-Greening-Draft-Guidelines.pdf>)

The San Francisco Forest Alliance urges you to remove the restrictions on non-native trees and plants from the Guidelines. Instead, we would suggest including a preference for planting trees that have not been treated with systemic pesticides.

(The San Francisco Forest Alliance is a 501(c)4 environmental organization based in California.)

We are very supportive of the program, which will fight climate change. Clearly, the planting of trees both to sequester and store carbon, and to shade buildings to reduce energy use for cooling, is valuable.

Trees are a crucial part of our green infrastructure. They're the only practical way to reduce carbon that's already in the atmosphere. They help regulate water flows, reduce particulate pollution, and provide wind barriers, all of which can reduce the energy used to mitigate those problems. They're also habitat for insects, birds, and animals - and this is why we would prefer new plantings to be "organic." Trees that have been treated with systemic pesticides can be toxic to wildlife, particularly pollinating bees.

As it's drafted now, the Grant Program apparently supports only the planting of "native" trees. The problem is that many urban areas in California had no native trees - like San Francisco. Even where there are native trees, they don't work in urban conditions. The recommended street-tree list from San Francisco's Friends of the Urban Forest has no native trees on it at all.

An urban environment is difficult for trees. Only a few pockets of urban areas are suitable for native trees. Oak trees, which are native trees in much of the Bay Area, are dying of Sudden Oak Death. The disease is spreading from year to year, and planting more oaks only spreads it further.

When planting trees in these difficult conditions, we need to be able to tap the huge variety of trees from all over the world to find the ones that work as street trees and park trees, in all the different growing conditions in cities.

Restricting ourselves to native trees is like having no trees at all.

Sincerely,

Dee Seligman,
Interim President,
San Francisco Forest Alliance

From: Tom Borden [<mailto:tom@intrinsicdevices.com>]
Sent: Friday, November 11, 2016 6:30 PM
To: UrbanGreening@CNRA
Subject: Urban greening tree selection restrictions

Hello,

The urban greening grants should not be restricted to native tree species. I live in San Francisco, a place where the variety of indigenous species is very limited and original tree cover almost nonexistent. Native species were/are not successful here. If we are going to improve our pitiful tree cover, we must plant non-native trees that are better suited to our climate and soil conditions. Please do not limit the grant money to push us to plant trees that will not be successful.

Tom Borden
Sent from my iPad

From: 12june1964@att.net [<mailto:12june1964@att.net>]
Sent: Friday, November 11, 2016 5:19 PM
To: UrbanGreening@CNRA
Subject: Non-Native versus Native Trees

When we are choking on CO, CO2, etc., why would any rational person or agency wish to place restrictions on the type of trees in our urban environment?

Living, as we do, at the edge of the Mt. Davidson forest, we can not see a single native San Francisco tree ... but the air smells sweet because of the 3 or 4 non-native species of trees.

James Reedy

From: Belgrave House [<mailto:neff@belgravehouse.com>]
Sent: Monday, November 07, 2016 11:06 AM
To: UrbanGreening@CNRA
Subject: Don't restrict to native trees

Please, your insistence on "primarily" native trees is misguided. Because of climate change, this would restrict trees in San Francisco and Oakland to only trees that can't flourish. Change your recommendation to any tree that can withstand climate change, whether native or non-native.

Thank you,

Elizabeth Rotter

From: Ellen G [<mailto:ellenrocs@gmail.com>]

Sent: Monday, November 07, 2016 9:07 PM

To: UrbanGreening@CNRA

Subject: Please eliminate the restrictions against planting non-native trees

To the Urban Greening Grant Program People:

I care about climate change, please join me in this effort to create a grant program that will expand our urban forests and reduce the greenhouse gas emissions that are causing climate change.

Restrictions against planting non-native trees must be removed from grant guidelines in order to increase our tree canopies in California's urban environments.

Climate change requires native plants and trees to change their ranges if they are to survive.

One of the indicators of the impact of climate change on our landscapes is that 70 million native trees have died in California because of drought, insect infestations, and disease.

The underlying cause of these factors is climate change.

- 66 million native conifers have died in the Sierra Nevada in the past 4 years because of drought and native bark beetles that have spread because winters are no longer cold enough to keep their population in check. <https://ww2.kqed.org/science/2016/08/10/californias-70-million-dead-trees-a-botanical-emergency-room/>
- 5 million native oaks have died since 1995 because of Sudden Oak Death. A study of SOD by University of Cambridge (<https://www.sciencedaily.com/releases/2016/05/160502161111.htm>) said in spring 2016 that the SOD epidemic is "unstoppable" and predicted that most oaks in California would eventually be killed by SOD. The Oak Mortality Task Force reported the results of its annual survey for 2016 recently. They said that SOD infections increased greatly in 2016 and that infections that were dormant in 2015 are active again. This resurgence of the pathogen causing SOD is caused by increased rain in 2016. (http://www.suddenoakdeath.org/wp-content/uploads/2016/10/10.14.16_News-Release-SOD-Blitz-Results.pdf)
 - Scientists predict that redwood trees will "relocate from the coast of California to southern Oregon" in response to changes in the climate. <http://www.natureworldnews.com/articles/17604/20151018/californian-redwood-relocation-earths-largest-trees-shift-northward-climate-change.htm>

Thank you for your consideration,

Ellen Gierson
Oakland, CA
tree hugger

From: SLAKEWINGS@aol.com [<mailto:SLAKEWINGS@aol.com>]

Sent: Monday, November 07, 2016 4:35 PM

To: UrbanGreening@CNRA

Cc: SLAKEWINGS@aol.com

Subject: About the draft guidelines for the grant program

Please, instead of your plan being focused on planting native plants and trees, consider that they are the most vulnerable to dying from Sudden Oak Death and infestations. To not waste taxpayers' money or all the work involved, why not instead plant trees that are healthy, resistant to California illnesses, and which also can help our native animals with food and shelter.

The nativist activists wield tremendous power but do not always know very much about plants or nature (as I've discovered from hiking with them.)

So few people know the basics about plants, environment, and even reality in terms of why some trees are surviving when so many are dying.

It does not take much to learn how vulnerable our native trees species are, with SOD, but also the beetle infestation of *Pinus Sabiniana*. Even young Redwoods throughout the Bay Area are dying, often because they were planted without the company of other Redwoods that they need, or were planted too close to road and embankments, when they need to be where water does not run off. They are very disease resistant, but lack of water and too much heat can kill them. The older ones seem fine, but younger ones are not.

Every native tree is vulnerable. (I don't know why the magnificent native Douglas Fir is never suggested in local plantings since it can grow taller than Redwoods and creates wonderful plant and animal diversity. On Mount Tamalpais, look under Douglas Firs to see the rare Calypso orchid and other wildflowers in spring. They are the only large conifer at Pt. Reyes.)

Anyway, why not decide to play it safe and not waste money by making future city tree plantings be of trees we know will thrive because they are not native and not vulnerable to local diseases?

Those who determine neighborhood tree plantings do not have a history of making good decisions. In the neighborhood I live in, they made an ornamental pear species be the street tree, even though many people could have told them that pears always are suffering with fireblight and they are spreading the illness by planting more, and also that that species of tree is highly allergenic. There are so many other wonderful choices to plant.

I suggest varied planting so we have as many trees survive and possible. Eucalyptus are vulnerable to freezing, but Monterey Pines seem to do fine in the same conditions. We are fortunate to live where a wonderful variety of trees from around the world can thrive, including trees sacred to other people and places. Why not take advantage of that and protect ourselves from losing most of our trees?

If anyone wants to learn which trees would make wonderful street trees and for other plantings, we can show you. Just looking at what is in botanical gardens gives a lot of ideas, and is also a way to see what trees do well in our particular climate. (Southern Hemisphere, like Australia, Chile, South Africa, and Mediterranean trees do particularly well.)

Bev Von Dohre

From: Mike Vandeman [<mailto:mjvande@pacbell.net>]

Sent: Monday, November 07, 2016 7:36 AM

To: UrbanGreening@CNRA

Subject: Urban Greening Grant Program

Do not plant any non-native plants!!!! Native animals require native plants.

I am working on creating wildlife habitat that is off-limits to humans ("pure habitat").
Want to help? (I spent the previous 8 years fighting auto dependence and road construction.)

Wildlife must be given top priority, because they can't protect themselves from us.

Please don't put a cell phone next to any part of your body that you are fond of!

<http://mjvande.info>

From: marymcallister@comcast.net [<mailto:marymcallister@comcast.net>]

Sent: Wednesday, November 02, 2016 10:22 AM

To: UrbanGreening@CNRA

Subject: Question about draft Urban Greening grant program

I am writing to ask for clarification about the draft Urban Greening grant program.

One of the listed "Examples of Ineligible Projects or Applications" is "Projects that primarily plant non-native/high or moderate water plants." (page 3).

Can you please confirm that this criterion applies only to plants, but NOT to trees?

Thank you,
Mary McAllister

From: Arthur Boone [<mailto:arboone3@gmail.com>]

Sent: Tuesday, November 01, 2016 9:24 PM

To: UrbanGreening@CNRA

Subject: I was present at the forum in Sacramento yesterday. For Ms. Esconvedo.

In recent years we have seen major changes in the properly conceived role of trees in the urban landscape. Heat island stuff is so 20th century and now we are looking at carbon sequestration, world-wide tree loss, and other related topics.

I enclose an article I wrote several months ago that is still being rewritten as time allows, but that tries to capture the effect of Charles Keeling's CO2 studies and the Yale report of August, 2015 on the head count and history of the world's trees.

I've done some presentations on these matters and would be glad to speak to your staff and answer questions when invited.

Arthur R. Boone
Sierra Club tree team: Founder and Chief Provisioner

From: Rami Nosseir [<mailto:rnosseir@delmar.ca.us>]
Sent: Tuesday, November 01, 2016 11:03 AM
To: UrbanGreening@CNRA
Subject: Urban Greening Grant Application Questions

Hello,

I am speaking on behalf of Del Mar, CA and I have a couple of questions regarding the application process for the Urban Greening Grant. Specifically, I want to know if this is a grant that is currently available to apply for, or is it still in the stages of scoping out the grant application requirements. If it is available now, what is the due date? Can I get access to the application now? Otherwise, if it's not yet available, am I able to figure out when the grant application period will open? Thank you for your time.

Rami Nosseir
City of Del Mar

From: Christine Viterelli [<mailto:cviterelli@arvin.org>]
Sent: Monday, October 31, 2016 12:19 PM
To: UrbanGreening@CNRA
Subject: Public Comments

Thank you for hosting the webinar this morning, it was very informative.
Regarding the urban greening grant. Our City could definitely use this program,
We are a small City in a rural community, that is definitely a disadvantaged community.

My question is about the definition of "urban" since Arvin is a city in a rural area.
Would we qualify because we are a city?

Kind Regards,
Christine



Christine Viterelli
City of Arvin Grant Writer
CITY OF ARVIN
cviterelli@arvin.org

From: Miles Gordon [<mailto:mgordon@ncoinc.org>]
Sent: Monday, October 31, 2016 4:36 PM
To: UrbanGreening@CNRA
Subject: Comments on Urban Greening Grant Program

To Whom It May Concern,

We are very excited about the upcoming Urban Greening Program. One key area that has been shown to increase carbon sequestration in urban, built environments, is to increase arable urban agriculture lands utilizing soil improvement techniques like composting, etc. This is an important and growing area for advancing GHG emission reductions. We recommend adding similar language as we have added in yellow, number 1. below.

QUANTIFICATION

The Urban Greening Program is responsible for reporting to the California Air Resources Board (ARB) GHG emission reductions resulting from funded projects in accordance with an ARB approved quantification methodology and Funding Guidelines for Agencies that administer California Climate Investments (December 21, 2015). All projects are required to show a net GHG benefit and provide multiple other benefits. In order to quantify GHG emission reductions, projects must include **at least one** of the following project activities—

1. Sequester and store carbon by planting trees *and/or increasing carbon sequestration through the development of arable urban lands using proven carbon sequestration methods, including soil improvements and urban agriculture.*

Sincerely,

Miles Gordon
Food Systems Director
North Coast Opportunities
www.gardensproject.org
www.ncoinc.org
Email: mgordon@ncoinc.org



From: Kirtley, Dena [<mailto:denak@cityofwestsacramento.org>]
Sent: Monday, October 31, 2016 8:40 AM
To: UrbanGreening@CNRA
Subject: Urban Greening Grant Program - Written Comments

Comments:

Regarding property purchase for tree planting purposes, we would prefer to have the option to pay fair market value rather than be tied to appraised value as it could potentially constrain the amount of money we ask for in the grant if we do an appraisal and the value of the property came back low.

The planting of Fruit Trees for orchard installation would be a good option. Are fruit trees allowable?

Installation of a well to allow for less expensive water use would be preferable....will this be an allowable expense?

Thank you,
Dena

DENA KIRTLEY
Urban Forest and Beautification Manager



denak@cityofwestsacramento.org

From: Richard Lankow [<mailto:aspenbio.rkl@gmail.com>]

Sent: Saturday, October 29, 2016 9:04 AM

To: UrbanGreening@CNRA; Tommy Ogren

Subject: Urban Greening Grant Program

I am writing in support of the Urban Greening Program. Actions such as this are important to our lifestyles and the environment in general.

I work in the field of allergy and would like the program to take the allergenic potential of any trees and plants selected for inclusion in the urban greening program.

As an example, a recent publication in the Annals of Allergy, Asthma, and Immunology reported that allergenic elm pollen is being detected in Atlanta in the the autumn. That finding was a surprise to the pollen counting site of the National Allergy Bureau. The researchers teamed with a horticulturist from the University of Georgia and found that landscapers and nurseries had begun recommending and planting Chinese Elm trees. Chinese elms are unusual in flowering and pollinating in the late summer and autumn.

Similarly, it has become common for cities and homeowners to plant "fruitless" varieties of some trees. Those fruitless varieties are "male" trees that produce pollen that can be allergenic to some people.

A good resource to consult as your planning progresses is "The Allergy Fighting Garden" by Thomas L. Ogren. In my work with allergy clinics around the U.S. I recommend this book to physicians so that they can become more aware of which plants produce aeroallergens and can, in turn, advise their patients.

My best wishes for a successful campaign.

Richard

Richard Lankow, Ph.D.

Aspen Bioscience

AspenBio.RKL@gmail.com

From: J. Ponte [<mailto:jay.ponte@gmail.com>]
Sent: Friday, October 28, 2016 12:35 AM
To: UrbanGreening@CNRA
Subject: Feedback on Urban Greening Draft Guidelines

I see in the project evaluation guidelines that you have included "Decreased pollen and other allergens (i.e., allergy or asthma contributors)" (page 18, Section j, item 1, 3rd bullet point). I am very happy to see this as an evaluation criterion.

Asthma and allergies are a major health concern for about 38% of the population and planting the wrong tree is far worse than planting no trees in terms of health impact for this large segment of the population.

I would like to suggest that you request the OPALS ratings for the proposed trees from applicants to quantify the health benefits (or health COSTS) of their proposals. OPALS is a scale that has been adopted by the California Public Health Department, the USDA and many other organizations to quantify the health effects of plants. It gives a clear indication of whether a proposed project will be beneficial or detrimental to the health of citizens. (See [https://en.wikipedia.org/wiki/OPALS_\(Ogren_Plant_Allergy_Scale\)](https://en.wikipedia.org/wiki/OPALS_(Ogren_Plant_Allergy_Scale)) for more information.)

Thank you for your consideration.

Sincerely,
Dr. Jay Michael Ponte
Mountain View, CA

From: jschmalle [<mailto:jschmalle@yahoo.com>]
Sent: Monday, December 05, 2016 1:23 PM
To: UrbanGreening@CNRA
Subject: Trees & plants permitted should be best for goals of the Urban Greening Project regardless of origin.

To Whom it May Concern,

The purpose of the Urban Greening Grant Program is to increase carbon sequestration and reduce greenhouse gas emissions, primarily by expanding the tree canopy in urban areas. Therefore it is both inappropriate and counter-productive to require exclusive use of native plants and trees because carbon storage is unrelated to the nativity of plants and trees.

Trees & plants permitted should be best for goals of the Urban Greening Program regardless of origin.

Please revise the guidelines to remove any requirement or preference for native plants & trees.

Respectfully,

Joral Schmalle

From: tloallergyfree@earthlink.net [<mailto:tloallergyfree@earthlink.net>]
Sent: Thursday, October 27, 2016 5:57 PM
To: UrbanGreening@CNRA
Subject: new urban greening program

Hi,

I would hope, and strongly encourage, that there is an allergy-friendly landscaping component to the new urban greening program. If one of the main concerns is cleaner air, then do consider that allergenic pollen is a major airborne pollutant. Also, please show consideration for the millions of people who have allergies and or, allergic asthma. If your program plants allergenic trees or shrubs near them, then you do these folks no favor.

It takes a little bit more selection work, perhaps, to ensure that all new plantings are allergy-friendly, but it is well worth the effort.

Tom Ogren
San Luis Obispo, CA

From: Vernon Vera [<mailto:Vernon.Vera@tulerivertribe-nsn.gov>]
Sent: Thursday, October 27, 2016 11:09 AM
To: UrbanGreening@CNRA
Cc: 'Charley Clouse'; neil.peyron@tulerivertribe-nsn.gov; Frausto, Marta E@DOT; dave.nenna@tulerivertribe-nsn.gov
Subject: Comments on Urban Greening Grant Program

1. Since tribes are eligible for other state grant projects: Affordable Housing, Caltrans, Cal EPA...Federally-Recognized Tribal entities should be eligible to apply for this program, especially since this project can align with other State funded grant projects such as: Alternative Transportation Program and Affordable Housing Cap and Trade Program.
2. That if effective consultation is recommended under the Urban Greening Program it should be realized that most tribes are located in rural areas...and are not in proximity to most urban areas...
3. Recommend: that the Urban Greening Grant Program be extended to rural areas that need expanded tree growth; and that 'earmarked' funding for tribes be strongly considered...

Thank you,
Vernon Vera

Vernon Vera, B.A.
Director of Planning & Community Development
Tule River Tribe
Email: Vernon.Vera@tulerivertribe-nsn.gov

From: Vernon Vera [<mailto:Vernon.Vera@tulerivertribe-nsn.gov>]
Sent: Thursday, October 27, 2016 10:01 AM
To: UrbanGreening@CNRA
Subject: Urban Greening Grant Program

Dear Sir,

We have received Planning Grant via Caltrans for sustainable transportation planning and are currently applying for an Active Transportation Grant for pedestrian safety, again, through Caltrans, and have implemented a tree planting project under the California Urban Forest Program in the recent past. Question: can Federally Recognized Tribes apply for the Urban Greening Grant Program?

*Thank you,
Vernon Vera*

Vernon Vera, B.A.
Director of Planning & Community Development
Tule River Tribe
Email: Vernon.Vera@tulerivertribe-nsn.gov

From: Gregory MacDonald [<mailto:GMacdona@carson.ca.us>]
Sent: Thursday, October 27, 2016 7:35 AM
To: UrbanGreening@CNRA
Subject: Comment on grant

Hello,

As the manager of the City of Carson's urban forest, The City is struggling to keep existing trees alive due to watering restriction/mandates. Since we can no longer water turf on medians with potable water, we are losing trees. We are working towards no-turf medians, but it takes time and money to do the mulching and sprinkler conversion as well as replanting with more drought tolerant ground covers. For many years all our new median plantings have been much more drought tolerant and turf-free. Is there funding available for this?

Thank you,

Gregory MacDonald, CA
Tree Maintenance Supervisor
City of Carson, Public Works



From: bryanmoller@gmail.com [<mailto:bryanmoller@gmail.com>]

Sent: Monday, December 05, 2016 3:53 PM
To: UrbanGreening@CNRA
Subject: Urban Greening Grant Program Guidelines Comment

Hello,

I am concerned about the Statewide Park Development and Community Revitalization Act of 2008 set of questions, for the following reason:

Not all cities had projects in the pipeline, much less projects that received funding, under the Act. Particularly cities that are in the Top 10% of DACs in Los Angeles County.

Keeping that set of questions as is would put Los Angeles County DACs at an immediate 5 point disadvantage.

I recommend rephrasing the questions to include all projects eligible under the Statewide Park Development and Community Revitalization Act of 2008 be allowed to receive the 5 points. At the very least, creating a sliding scale or 5 point/3 point split between projects that received funding vs. projects that were eligible to receive funding.

We should not be penalizing DACs for the inability to fund projects, we should be encouraging DACs to pursue funding for projects that would, in a non-DAC setting, have had funding attached to them.

Thank you,
Bryan S. Moller
City of Bell, Los Angeles County resident

From: Lia Olson [<mailto:liajolson@gmail.com>]
Sent: Monday, December 05, 2016 12:15 PM
To: UrbanGreening@CNRA
Subject: Proposal for "greening" of urban areas of California

I'm so disturbed by efforts to restrict planting of California's largely bare urban streets to native species only.

- 1) Our climate has changed precipitously in recent years and the salient issue is now survivability in the CURRENT climate conditions, not that of the past.
- 2) We have lost a dangerous number of trees to drought, infestation and fire in recent years and need to focus on injecting trees that are not subject to the dangers that have decimated the number carbon sequestering species that once covered our state.
- 3) A tree canopy is a definite advantage for an ecosystem subject to environmental heating, and native species tend not to offer that benefit.

What we NEED are the trees most adapted to urban communities, most prone to grow tall enough to create a canopy, most adapted to the climatic conditions of TODAY, and most resistant to disease.

We need research into species that fulfill these requirements. Unfortunately, native species tend not to fit these specifications. Much as the romantic idea of returning to the pristine landscape of yesteryear seems emotionally resonant, it carries echoes of the promises to "Make American Great Again" touted in the last Presidential campaign. What constitutes "great" today is NOT what existed in the past.

We can't afford to spend this money and get it wrong during a time of urgent climactic heating. We need to plant species that will grow tall, dispense shade, and sequester carbon under today's conditions.

Please to not succumb to Nativist romanticism and squander the opportunity. It is too important!

Sincerely,

Lia Olson
Berkeley, CA

From: Sadie Graham [<mailto:sgraham@bart.gov>]
Sent: Monday, December 05, 2016 10:37 AM
To: UrbanGreening@CNRA
Cc: Nicole Foletta; vmenott@bart.gov
Subject: Question re: Urban Greening Grant Program

Hello,

BART is hoping to put together an Application in coordination with some surrounding Cities/Counties to improve ped/bicycle access to stations and to improve the parking lot/public plazas with trees and other landscaping that also improves water quality and pedestrian comfort.

1. Our main question is what level of planning needs to be completed to receive funding; and can the grant funds be used to fund further planning/design and to pay consultants.
2. Does the 25% of grant funds for development projects include construction management costs during construction, or only pre-construction design/management. (construction management, safety monitoring, etc.).
3. Is there a percent for art required.

Thank you for the opportunity to submit questions. Would it be possible to schedule a call with someone from the Grant Program to discuss our project and its potential competitiveness. We have a great need, but given the fund limitations and extensive application, we would like to determine if we are a potential applicant before we dedicate the resources to prepare the grant request.

Thanks!

Sadie Graham
Project Manager - Sustainability
BART Planning + Development

From: Madeline Hovland [<mailto:mhovland@mindspring.com>]

Sent: Monday, December 05, 2016 12:49 PM

To: UrbanGreening@CNRA

Subject: Comment on Urban Greening Grant Program

From:
Madeline Hovland

December 4, 2016

To:
Urban Greening Grant Program
c/o The California Natural Resources Agency
Attn: Bonds and Grants Unit

Re: Draft Funding Guidelines

To whom it may concern:

Restrictions against planing non-native trees must be removed from grant guidelines in order to increase our tree canopies in California's urban environments.

As you may know from your own research, there are few species of trees in California that meet the standard of being "native." The designation "native" depends on how far back one wants to go. Originally, only moss and lichens may have been native to this area that we now call the state of California.

Trees, such as several species of oaks that are native to California, are dying at an alarming rate due to Sudden Oak Death. Other tree species such as redwoods that once were able to thrive in the temperate climate of northern California are succumbing to various diseases at least in part because of drought and warmer weather. The drought alone has destroyed millions of so-called "native" trees. To continue to plant trees that are too fragile to thrive in a drier and warmer climate is a waste of money if not a failure of intelligent planning.

Since the goal of the California Urban Greening Grant Program is to reduce greenhouse gas emissions--not to restore native plants and trees or plant them where they never grew previously and would not thrive in today's climate--it is unfortunate (if not like shooting oneself in the foot) to exclude non-native trees from the Program. It is important when the draft is revised to closely review the Program's priorities. We certainly need more trees in our urban forest, we should guard against cutting down the trees that we currently have, and there should be no restrictions against planting and maintaining non-native trees.

After checking the list of street trees approved for the City of Oakland (where I live even though our zipcode is Berkeley 94705), I see that of the 48 species of trees listed, only two appear to be native to this area. Of those two native trees, one is toyon, actually a chaparral shrub, and the other one, coast live oak, is dying off rapidly due to Sudden Oak Death. In fact, coast live oak may be appropriate for a park or garden, but is problematic as a street tree because of its widely spreading roots. Most of the

street trees in this area are non-native: ornamental cherry, pear or plum (all flowering but not fruit-bearing), ginkgo trees, magnolias, and London plane.

It should also be pointed out that most of the trees on Oakland's "approved" list, including the several species of pine trees that are subject to insect infestations, are softwood trees that grow quickly but are not as good for storing carbon as non-native hardwood trees (such as eucalyptus) that can live for centuries and have adapted to all kinds of climates. Hardwood trees that grow quickly and live for a long time are considered to be most efficient at taking in CO₂ and storing it. Many oak trees are also hardwood, but because of S.O.D. they may not survive as long as the non-natives.

I am concerned that so many non-native trees in our East Bay hills are being cut down. There is total disregard for their ability to store carbon and thus reduce greenhouse gas emissions. It would be ill-advised and counter-productive if urban greening grants were used to remove non-native forests of tall eucalyptus with large-diameter trunks, with the excuse that native plants and trees could grow in their place. The bigger the diameter of the trunk, the bigger is the environmental loss when such trees are cut down. I would like to point out that where eucalyptus trees were removed in this area, even though they were in forests far from any residence or structure, hundreds of redwoods were planted (where they had never grown previously). The redwoods died because of lack of shade and water for their first several years.

The irrelevant concerns of nativists who want to remove non-native trees in a futile and misguided effort to restore the landscape to the way it looked hundreds of years ago must be ignored if the goal of the Urban Greening Program is really to plant and/or maintain trees that are most efficient at storing carbon.

Several years ago, my husband, John Hovland, who has a PhD in civil engineering from UC Berkeley, used two different methods to calculate the carbon stored in two large blue gum eucalyptus trees at the edge of a city park on Alvarado Road. One method used the formula developed by the U.S. Forest Service.

CUFR Tree Carbon Calculator (CTCC), Developed by the Center for Urban Forest Research, Pacific Southwest Research Station, US Forest Service, in partnership with the California Department of Forestry and Fire Protection.

<http://www.fs.fed.us/ccrc/topics/urban-forests/>

He used the second method, based on the shape of the trees, primarily as a check against the results of the first method.

Forest Measurement and Modeling,

<http://fennerschool-associated.anu.edu.au/mensuration/shape.htm>

Husch, B., Beers, T.W., and Kershaw, J. A., Jr., "Forest Mensuration," 4th ed., John Wiley & Sons, Inc., Hoboken, New Jersey, 2003

Both trees are approximately 100 years old and they are about the same height, approximately 113 feet tall. He found that one of the trees, with a dbh of 48.7 inches at that time, has stored 29.5 tons of carbon per year. The other, larger tree, with a dbh of 87.22 inches, including the main trunk and 3 major trunks that have split off from the main trunk, has taken in 89.9 tons per year. These results were based on calculation methods that were the best Dr. Hovland could find at that time.

Eucalyptus trees are being planted in many parts of the world as part of Carbon Benefits projects. Allometric equations have been developed, for example, in Kenya to “measure, monitor and verify just how much carbon is stored” in trees planted by smallholder farmers.<http://www.worldagroforestry.org/news/carbon-blue-gums3>

I am not suggesting that eucalyptus trees (or redwoods, or any tall tree for that matter) should be planted close to houses or other structures, even though they do provide shade. I am simply pointing out that using urban greening grant money to remove eucalyptus and other tall non-native trees, especially those that grow in forests, is a ridiculous waste of money.

The future environmental health of our planet depends in large part on preserving our green infrastructure. Expanding our urban forests can reduce the greenhouse gas emissions that cause climate change. Non-native trees must be valued, preserved and planted for their ability to withstand climate change as well as their considerable ability to sequester carbon,.

From: Joshua Hugg [<mailto:jhugg@openspace.org>]
Sent: Thursday, December 01, 2016 2:46 PM
To: UrbanGreening@CNRA
Subject: Disadvantaged Community determination

Hi Melissa,

Here is the link I spoke to you about that might be more useful in determining disadvantaged community status: <https://gis.water.ca.gov/app/dacs/>

It uses 2010-2014 ACS data, rather than the 2008-2012 ACS data used on the California State Parks' Community Fact Finder website: <http://www.parksforcalifornia.org/communities>

It may also be of interest that the 2011-2015 ACS data will be available December 8, 2016: <https://www.census.gov/newsroom/press-releases/2016/cb16-199.html>

Regards,

Joshua Hugg, MPA
Legislative/External Affairs Specialist
Midpeninsula Regional Open Space District
www.openspace.org | twitter: [@mrosc](https://twitter.com/mrosc)

From: Henderson, Annette [<mailto:annette.henderson@lausd.net>]
Sent: Thursday, November 03, 2016 4:01 PM
To: UrbanGreening@CNRA
Cc: Higuera, MARIA
Subject: Urban Greening Grant Program Applicant Eligibility

Good Afternoon,

My colleague and I appreciated today's workshop presentation. We found it to be very helpful in understanding the Draft Guidelines. I do have a question, however, regarding the applicant eligibility of school districts. I understand that school districts are not eligible to apply as "special districts." The Los Angeles Unified School District is a political subdivision (governmental agency) of the State of California. Will the District be eligible to apply as a public agency?

I look forward to hearing from you. Again, our appreciation for the workshop presentation.

Regards,
Annette Henderson
Los Angeles Unified School District
Facilities Legislation, Grants and Funding

December 5, 2016

John Laird, Secretary
California Natural Resources Agency
1416 9th St #1311
Sacramento, CA 95814

VIA E-MAIL

Re: Urban Greening Program Draft Guidelines

Dear Secretary Laird:

Thank you for the opportunity to review and comment on the draft Urban Greening Program Guidelines (Guidelines) funded through the Greenhouse Gas Reduction Fund (GGRF). We commend the thoughtful approach your staff has taken in developing the Guidelines and respectfully submit the feedback below to strengthen them. The undersigned organizations represent active transportation, recreation, public health, and social equity, organizations that have a strong interest in promoting state investment in trails, greenways, walking and bicycling projects in California, especially to benefit residents with the greatest needs. We all thank you for committing to achieve greenhouse gas (GHG) reductions while providing essential benefits to urban communities in need through this competitive grant program.

Overall, we applaud moving forward with active transportation activities being a key component reflected in the Guidelines' priorities. We value that the Guidelines explicitly emphasize reducing Vehicle Miles Traveled (VMT) by increasing the use of alternatives such as active transportation. Increased levels of bicycling and walking in lieu of vehicle travel must play a significant role in reducing GHG emissions if California wants to meet the targets set by AB 32. However, we recommend that the Guidelines reflect a longer-term and more comprehensive active transportation vision to achieve our air quality, climate, and equity goals – as required by AB 32, SB 535, SB 32, AB 197, AB 1550, and SB 859.

Our organizations are writing to you to express concerns we have identified with the Guidelines and offer several recommendations to strengthen the program to maximize the benefits of the program for all Californians.

Summary of Recommendations

- 1. Improve Active Transportation VMT Reduction by Combining it with Community Acquisition of Green Space in Accordance with SB 859**
- 2. Promote Further Reduction in VMT by Encouraging Active Transportation Projects to Align with Broader Plans and Programs**
- 3. Further Prioritize Low-income Communities Lacking Active Transportation Infrastructure and/or Planning Efforts**

- 4. Provide More Clarity on Scoring, Especially for Trails, Greenways and Bicycling Projects:**
- 5. Ensure Protection of Disadvantaged Residents by Implementing Anti-Displacement Measures**

1. Improve Active Transportation VMT Reduction by Combining it with Community Acquisition of Green Space in Accordance with SB 859

We support the following recommendation by the Trust for Public Land in their letter, to maximize greenhouse gas reduction through increasing infill green space in existing urban communities:

In order for this program to be consistent with the legislative goals and language of SB 859, and to maximize GHG reduction, we suggest the addition of a fourth measure on page 2 in the “Quantification” sub-section. It is to read as follows: "4. Avoid vehicle miles travelled by acquiring new green space in urban areas and extinguishing development rights." As currently written, there is no way for this program to implement the express language in SB 859 to support projects that "acquire....community parks and green spaces." The value in extinguishing development rights to create parks and green space is important, not just to reduce GHGs through VMT but to create the "healthy and vibrant communities" described on page 2. Nevertheless, we understand that it may not be possible to create a functioning methodology for quantifying the benefits of an urban acquisition for this funding round. In that case, we recommend that you craft the guidelines to leave the door open to acquisitions as standalone projects in future cycles.

2. Promote Further Reduction in VMT by Encouraging Active Transportation Projects to Align with Broader Plans and Programs

Aligning successful projects with broader local, state, or federal active transportation funds, priorities, and goals will ensure projects funded through the Urban Greening Program are not isolated green improvements disconnected from their urban settings. The grant Guidelines do not incentivize this active transportation plan coordination or leveraging of funding between government agencies or even with emerging private development. We recommend adding categories of points under the scoring criteria for both projects that are supported in existing community plans and connect to or fill a key gap in local walking and bicycling infrastructure networks, as well as for projects that leverage other GGRF or state grant funds.

We also recommend adding clarity around how projects can provide meaningful bicycle and pedestrian infrastructure improvements that seek abundant connections to workplaces, school, commercial centers, and residences.

Currently, the project quantification and evaluation language in the Guidelines encouraging active transportation could hypothetically be achieved in isolation with no real connectivity to priority destinations beyond the project site, mobility, or modal shift benefits. This minimum understanding

of active transportation improvements is vague and insufficient. For example, under this definition, an applicant could satisfy the grant program's main quantification requirement by committing to an isolated segment of trail out of reach of any residences or workplaces because of a barrier such as a freeway or railroad right-of-way. Additionally, we recommend that potential projects describe safety measures for residents accessing the project and methods of encouragement for a modal shift in the community.

Significant investments in walking and bicycling in coordination with transit and land use investments offer cost effective opportunities to implement AB 32 and reduce GHG. Specifically, investments in comprehensive walking, bicycling and multi-use trail networks, first and last mile connections to transit, Safe Routes to School programs, and the creation of walkable neighborhoods through new and infill development all offer opportunities to reduce VMT, reduce GHG emissions and improve the health of Californians and their economy.

3. Further Prioritize Low-income Communities Lacking Active Transportation Infrastructure and/or Planning Efforts

To meet SB 859 and supplement its statutory goals, it is important to understand the starting place of many disadvantaged communities and their current dearth of bicycling and walking infrastructure improvements. For example, many community-based organizations (CBOs) lack the funding, project, and staff experience to make them competitive with more established entities such as cities or counties that likely have additional resources/support in the application process. We appreciate that the Guidelines already include priority considerations pursuant to SB 859, but we recommend priorities go further with more clarity on specific activities that apply to disadvantaged community applicants and demonstrate strong community support and engagement directly with residents in those communities – whether governmental agencies or CBOs. Increasing priority points in the scoring process should also apply to the below conditions. For those already reflected in the Guidelines, projects should be required to strengthen their commitments as safeguards to ensure that affected residents share in the benefits of major greening developments.

- Projects that show applicants authentically engaged the local community (We support the California Climate Equity Coalition recommendation that Memorandums of Understanding with local community groups should be the standard of evidence for forming these relationships)
- Projects that demonstrate multiple benefits (economic, environmental, social) to low-income residents and deliver benefits that significantly outweigh any burdens that will fall on those residents
- Developing performance measures that include actual benefits to low-income populations
- Projects that form community agreements with stakeholders to access workforce education, training, and quality jobs for low-income residents
- Intentions to improve environmentally burdened areas that are allowable covered expenses
- Activities for infill development with appropriate anti-displacement measures

4. Provide More Clarity on Scoring, Especially for Trails, Greenways and Bicycling Projects

It is clear that trails, greenways and bikeway projects are eligible and will advance the goals of the Urban Greening Program. However, some of the language needs to be modified to better address these project types. Here are a few recommended changes:

- On the application form on page 12, under statutory requirements, the second box should read: “Creates, Enhances or Expands Community Green Spaces, including Trails and Bikeways”
- On the bottom half of page 14, in the scoring section for “Statutory and Program Requirements”, question #1 should be revised to read: “Explain how the projects meets the criteria of 1) acquiring, creating, enhancing or expanding community parks, green spaces, **trails and bikeways...**” (new text in bold). Otherwise, it’s not clear how a proposed trail or bikeway project would answer this question, as those project types are not listed, though they are clearly eligible. Conforming changes should be made in other sections of the document that have this same language.

The scoring system overall should be improved by including specifics and clarity. As currently written it is unclear to applicants what is required to score well. For example, the first section on “Statutory and Program Requirements” contains four mandatory questions followed by a long series of sub-questions which are worth 50 points. However, these points are not allocated to individual questions, but to the section as a whole. We are concerned that this scoring system will lead to arbitrary scores that do not correspond to the answers provided and will undermine SB 859. To increase transparency and clarity, the Agency should attribute points for each question within each individual section rather than provide one score per section, or provide more explanation about how points can be earned by answering the various questions under that section. It’s also important to ensure that all different project types - whether parks, tree plantings, trails or bikeways - have an equal chance to get the maximum score, provided they are eligible and are designed to meet program goals.

On page 16, in section c) re Non-motorized trails, we encourage you to include some other questions about trail attributes that help achieve the program goals, such as:

- Describe how the trail increases connectivity of the active transportation network, such as filling gaps or otherwise completing routes in a bike or trail plan or a low-stress bikeway network?
- Does the trail connect to or between parks, open space or other green infrastructure?
- Does the trail improve safety for bicyclists and/or pedestrians, which may lead to increased biking and walking?

5. Ensure Protection of Disadvantaged Residents by Implementing Anti-Displacement Measures

Given the anticipated, and sought-after improved economic outcomes of Urban Greening investment in disadvantaged communities, we recommend that anti-displacement measures be required with use of program funds so that current residents and businesses are not priced out of their communities as a result of program benefits. The SGC's Affordable Housing and Sustainable Communities (AHSC) program sets a precedent for this, and we believe that anti-displacement strategies should be incentivized in project scoring. The AHSC program gives applicants a maximum of 4/100 points for anti-displacement strategies; we encourage Resources Agency to devote 10% of project scoring to promote enhanced anti-displacement measures.

Additionally, project applicants should demonstrate authentic community engagement with local community organizations that specifically represent low-income populations. This must be incorporated into the Guidelines and as stated above, and MOUs with local community groups should be the standard of evidence for forming these relationships and treated as an allowable expense.

Thank you again for the opportunity to comment on the draft Urban Greening Program Guidelines, and for the Agency staff's hard work on ensuring that its grant programs continue to be a model program for advancing sustainable and equitable investments in California. We look forward to working with Resources Agency in the continued development of this important program for communities throughout California.

Sincerely,

Jeanie Ward-Waller, Policy Director
California Bicycle Coalition

Laura Cohen, Regional Director
Rails-to-Trails Conservancy

Wendy Alfsen, Executive Director
California Walks

Bill Sadler, California Senior Policy Manager
Safe Routes to School National Partnership

Tamika Butler, Executive Director
Los Angeles County Bicycle Coalition

Andy Hanshaw, Executive Director
San Diego County Bicycle Coalition



December 5, 2016

The Honorable John Laird
California Secretary for Natural Resources
California Natural Resources Agency
Attn: Bonds and Grants Unit

RE: Urban Greening Grant Program Draft Guidelines

Dear Secretary Laird:

We write to you as environmental justice and land use organizations dedicated to improving green space equity and health equity in Los Angeles. We are excited for the new Urban Greening Grant Program funded by California Climate Investments and appreciate the opportunity to comment on the draft guidelines. Our comments reflect our top priorities for all statewide grant programs: (1) robust investments in and for disadvantaged communities; (2) comprehensive, authentic community outreach and engagement; (3) transparent project evaluation; and (4) ease of application.

Disadvantaged Communities

We applaud the statutory requirement under SB 859 that directs the Agency to allocate at least 75 percent of funding available to projects that are located in, and that provide benefits to, disadvantaged communities. However, the draft guidelines offer two different definitions of “disadvantaged community” and one separate definition of “critically underserved community”—and the “Disadvantaged Communities” section on pages 4-5 does not make clear that there is a hierarchy to these definitions (made apparent only after the Agency’s public hearing presentation on November 3). **This section should be rewritten to clearly and simply state that 75 percent of funding will be allocated to disadvantaged communities, as defined by the top 25 percent highest scoring census tracts from CalEnviroScreen 2.0 (which has statutory authority under SB 535). Furthermore, the guidelines should clearly state that among the remaining 25 percent of funding, projects that meet the other two definitions—communities with less than 80 percent of average statewide median household income or communities with less than three park acres per 1,000 residents—will be prioritized.**

Community Outreach and Engagement

In the “Project Evaluation” section on pages 14-23, broad questions about “community involvement” in the project are scattered throughout, but there is no standard for what meaningful community involvement means. Is a project with three letters of support valued the same as a project that hosted (or plans to host) three community design workshops with door-to-door outreach to all households and businesses within a ½ mile radius of the project? The lack of clarity and incentive for projects to include a comprehensive community engagement process may lead to ignoring or not addressing important

community concerns, which may have negative consequences in the long run, as urban green spaces can turn from vacant to vibrant to vacant again without community ownership and pride.

Therefore, we strongly recommend inserting “Community Outreach and Engagement” as a new and separate subsection under the “Disadvantaged Communities” scoring section (pages 20-21). This “Community Outreach and Engagement” subsection should be modeled after the “Community Based Planning” guidelines of the Statewide Park Development and Community Revitalization Program of 2008 (AB 31). These guidelines (Application Guide dated April 1, 2009; pages 33-37) have a comprehensive rubric of in-depth community engagement, including the number and convenience of community meetings, the breadth and depth of community outreach for those meetings, and the breadth and depth of topics covered at those meetings. In order for the new Urban Greening Program to realize successful and lasting investments in disadvantaged communities, it must incorporate and incentivize through points a comprehensive community engagement process.

Transparent Project Evaluation

We appreciate that the “Project Evaluation” section (pages 14-23) emphasizes the project’s narrative, as the narrative can bring the project’s impacts to life and allows for more holistic judgement of the project. However, we would like some transparency as to HOW the narrative will be evaluated. The scorecard on page 14 includes the point values of whole sections, but within those sections, how will points be awarded? We don’t necessarily think every single narrative question should have a point value, but **we would like at least a description of the scoring criteria and/or scoring process for each scoring section so that there is transparency in the evaluation process.** A good example is the California State Parks Youth Soccer and Recreation Development Program, which has a scoring rubric for each of the selection criteria (Application Guide dated March 1, 2016; starting on page 22).¹

Ease of Application

In the “Project Evaluation” section, under scoring section 1, “Statutory and Program Requirements” and scoring section 2, “Statutory and Program Priorities,” asking applicants to answer ALL of the questions associated with each multiple benefit can be a heavy burden for applicants with fewer resources or from smaller organizations. **We suggest clarifying that applicants should choose two benefits and answer the respective questions. If the project meets additional benefits (beyond the mandatory two), the applicant can answer those questions for additional points.** In addition, each scoring section should have a character or word limit.

Finally, on a formatting note, the entire “Project Evaluation” section (pages 14-23) is difficult to read because of unclear delineations between scoring sections, subsections, and multi-part questions. **We suggest using an enumerated outline format to more clearly delineate one section from the next.**

We appreciate your consideration of our comments and look forward to continued involvement in the Urban Greening program development process.

Sincerely,

Alina Bokde
Executive Director
Los Angeles Neighborhood Land Trust

¹ https://www.parks.ca.gov/pages/1008/files/youth_soccer_app_guide_final_3.1.2016.pdf

Tamika Butler
Executive Director
Los Angeles County Bicycle Coalition

Irma R. Muñoz
President and CEO
Mujeres de la Tierra

Veronica Padilla-Campos
Executive Director
Pacoima Beautiful

Miguel Luna
Executive Director
Urban Semillas

cc: The Honorable Kevin de Leon, Senate President Pro Tempore
The Honorable Anthony Rendon, Speaker of the Assembly



CONSERVATION
CORPS OF LONG
BEACH

CIVICORPS (EAST
BAY)

EOC / FRESNO
LOCAL
CONSERVATION
CORPS

LOS ANGELES
CONSERVATION
CORPS

CONSERVATION
CORPS NORTH BAY

ORANGE COUNTY
CONSERVATION
CORPS

SACRAMENTO
REGIONAL
CONSERVATION
CORPS

SAN FRANCISCO
CONSERVATION
CORPS

GREATER VALLEY
CONSERVATION
CORPS

SAN JOSE
CONSERVATION
CORPS

SEQUOIA
COMMUNITY CORPS
(TULARE)

URBAN CORPS OF
THE INLAND EMPIRE

URBAN CORPS
OF SAN DIEGO
COUNTY

ENABLING
CALIFORNIA'S LOCAL
CONSERVATION CORPS
TO WORK TOGETHER TO
BUILD STRONG YOUTH
DEVELOPMENT
ORGANIZATIONS
THROUGH A PROGRAM
OF CONSERVATION
WORK, EDUCATION
AND COMMUNITY
SERVICE.

December 5, 2016

The Honorable John Laird
California Secretary for Natural Resources
California Natural Resources Agency
Attn: Bonds and Grants Unit
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Urban Greening Grant Program Draft Guidelines

Dear Secretary Laird:

Thank you for the opportunity to comment on the Draft Guidelines for the Urban Greening Grant Program. We, the 13 state-certified local conservation corps represented by the California Association of Local Conservation Corps (CALCC), are pleased to see Greenhouse Gas Reduction Funds being directed towards climate beneficial projects in California's urban communities. We are especially excited by the Natural Resource Agency's emphasis on disadvantaged communities and maximization of funds through investments in workforce education and training.

California's state-certified community ("local") conservation corps have decades of experience and success helping the state reach its climate and conservation goals, while providing job training, workforce development, education, and job placement opportunities to unemployed residents of disadvantaged and underserved communities. We have seen first-hand the overwhelming need and potential that still exists in providing education and workforce opportunities to these communities.

Statutory and Program Requirements

First, we are pleased to see that economic, social, and health benefits are identified among the benefits a project can include to achieve the multiple benefits required under the program's Statutory and Program Requirements. Specifically, we appreciate the agency requiring applicants to address "workforce education and training, contracting, and job opportunities for disadvantaged communities" if they expect to use "economic, social and health benefits" as one of their two required multiple benefits. When designing neighborhood greening projects, it is important to capture all opportunities for community benefit, including training residents in those communities to enter the workforce. Giving applicants the opportunity to provide information on "how the project will use state or local youth employment programs (e.g., California Conservation Corps, local conservation corps or similar youth employment programs) and how the youth employment element will be integrated into the program" further emphasizes the importance of this critical element, and provides applicants with a proven tool to achieve these benefits.



CONSERVATION
CORPS OF LONG
BEACH

CIVICORPS (EAST
BAY)

EOC / FRESNO
LOCAL
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WORK, EDUCATION
AND COMMUNITY
SERVICE.**

Statutory and Program Priorities

Second, we appreciate the Agency giving applicants the opportunity to earn additional points through the Statutory and Program Priorities if their project “develops partnerships with local community organizations and businesses in order to strengthen outreach to disadvantaged communities, provides access to quality jobs for residents of disadvantaged communities, or provides access to workforce education and training”. However, we believe that this priority is a critical component of these projects, and should be promoted as such. These workforce partnerships enable underserved community members to be an active part of these projects, and gain invaluable skills for employment. Therefore, we request that the agency identifies workforce education and training as one of the minimum elements that a project *must* include in order to be given additional points.

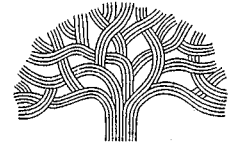
The California Association of Local Conservation Corps applauds the Agency for its efforts to encourage projects that are thoughtfully and intentionally designed to deliver multiple benefits to the communities they serve. Urban greening projects provide critical health and safety benefits, but also present a great opportunity to provide workforce education and training for residents of those communities. We applaud the agency for including the above requirements and points in their Urban Greening Guidelines, and hope to see them retained in the final program guidelines.

We appreciate your consideration of our comments and look forward to continued involvement in the Urban Greening program development process.

Sincerely,

Alan Lessik
President
California Association of Local Conservation Corps (CALCC)

CITY OF OAKLAND



CITY HALL • ONE CITY HALL PLAZA • OAKLAND, CALIFORNIA 94612

Office of the Mayor
Honorable Libby Schaaf

(510) 238-3141
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December 5, 2016

Mr. John Laird
Secretary, California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Secretary Laird,

On behalf of the City of Oakland, I am writing to comment on the California Natural Resources Agency's draft guidelines for its Urban Greening grant program. We applaud your staff in crafting thoughtful program guidelines for projects that will sequester and store carbon in trees, reduce building energy use through canopy shade, and provide active transportation alternatives that reduce greenhouse gas emissions in vulnerable communities.

However, the City of Oakland asks the Natural Resources Agency to strongly consider including funding, and awarding points in reviewing applications, for the preservation and maintenance of mature trees in disadvantaged communities. The exclusion of mature tree preservation in this Urban Greening grant funding misses out on a great opportunity to reduce greenhouse gas emissions. Large, mature trees can remove as much as 70 times more pollution than small trees, demonstrating the need for large, mature trees for any carbon sequestration or emission reduction project.¹

As happened in so many other cities, the funding and staffing of Oakland's Tree Services Division was drastically reduced in the Great Recession, and the City has not been able to restore those services to date. State funding requirements should take this into account. As urban forests require active, consistent, continuing management, the accrual of net benefits like carbon sequestration can only occur when adequate and reasonable care is provided.ⁱⁱ As such, the Natural Resources Agency should consider applicant efforts to preserve trees as a priority and goal for the Urban Greening program. It could be haphazard and counterproductive to continue planting new trees within disadvantaged communities when there is no program or funding in place for their regular maintenance when they are mature and potentially providing the most environmental benefits.

Oakland currently has an average canopy cover of 25 percent; however, this coverage is not equitable. Canopy coverage in Oakland's disadvantaged communities are as low as 6 percent. The Natural Resources Agency is uniquely positioned to provide comprehensive funding for urban greening that will support street tree preservation in disadvantaged communities, where canopy coverage and greenery of any kind are at their lowest. Due to the City's inability to maintain street trees, in 2008, Public Works granted property owners conditional permission to perform tree pruning in front of their property by hiring a certified arborist. In low income urban areas, residents who benefit the most from the trees have the least ability to afford that work. When property owners are absent or cannot afford to maintain these trees, residents often simply cut the trees down illegally, or ignore problems until they are an imminent public hazard. In order for trees to provide their maximum benefits for GHG sequestration, pollution capture, and storm water mitigation – all of which

benefit disadvantaged communities the most – they must be allowed to achieve their maximum size and live as long as possible. Trees are not maturing to their maximum potential as a result, and both the City and urban forestry nonprofits must deeply consider this in light of efforts to plant new trees that are unlikely to live beyond saplings.

Many cities like Oakland do not have an accurate assessment of the effects of the last eight years of deferred maintenance on their current trees. The City of Oakland is currently seeking CalFire funding to craft an Urban Forestry Master Plan that will include a funding plan for street tree maintenance, as well as revised ordinances and robust community partnerships to support a growing, healthy urban forest that will benefit all Oaklanders and sequester maximum GHG emissions. Funding for preservation could go a long way to bolster these efforts.

On a more technical matter, our department staff has questions regarding the draft guidelines. For one, the guidelines require quantitative measurement of greenhouse gas reduction for each project application. This raises concern among our staff that projects will only be considered if they are or near full development, which could limit new and innovative projects that are in conceptual phases. Second, the guidelines stipulate that reallocations of dollars in a budget category of more than 10 percent must be approved by the State. While we understand the need for oversight in grant spending, we suggest that the Agency require applicants to submit updated allocations should they change through the bidding process.

It would be great if we could connect with your staff regarding these questions and comments. If you have questions or information regarding these comments please contact Susan Kattchee, Assistant Director of our Public Works Agency, at 510-238-6382. We are excited for this GGRF funded opportunity to equitably transform the environment in our disadvantaged communities into places that are more sustainable, enjoyable, and effective, by establishing and enhancing parks and open space, using natural solutions to improving air and water quality and reducing energy consumption, and creating more walkable and bike-able trails. We look forward to the opportunity to partner with your team to increase sustainability and improve the quality of life for our most vulnerable communities.

Sincerely,



Libby Schaaf
Mayor, City of Oakland

cc: Governor Edmund G. Brown
Nancy McFadden, Office of Governor Brown
Assembly Member Rob Bonta
Assembly Member Tony Thurmond

ⁱ McPherson, E. G., Nowak, D. J., & Rowntree, R. A. (1994). *Chicago's urban forest ecosystem: Results of the Chicago urban forest climate project*. US Dept. of Agriculture Forest Service.

ⁱⁱ Clark, J. R., Matheny, N. P., Cross, G., & Wake, V. (1997). A model of urban forest sustainability. *Journal of Arboriculture*, 23(1), 17-30.



**METROPOLITAN
TRANSPORTATION
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December 5, 2016

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Ms. Polly Escovedo
Urban Greening Grant Program
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Urban Greening Grant Program Draft Guidelines

Dear Ms. Escovedo:

The Metropolitan Transportation Commission appreciates the opportunity to provide comments on the draft guidelines for the Urban Greening Grant Program. Overall, this program represents a great opportunity to reduce greenhouse gas emissions through active transportation and green infrastructure, and we hope that potential project sponsors throughout the Bay Area will apply for these funds. We suggest applying your disadvantaged communities target more broadly, in order to ensure that deserving communities throughout our region and the state can access these funds.

In our work with various state agencies in the implementation of Greenhouse Gas Reduction Fund programs, we have raised concerns with the inadequacy of CalEnviroScreen as a tool to identify disadvantaged communities. For example, the top 25% of CalEnviroScreen communities leaves out many Communities of Concern identified through our regional plan, with factors such as low income, minority, and limited English proficiency population, zero-vehicle households, and more. To that end, it is positive to see that SB 859 expands the definition of disadvantaged communities for this program.

Specifically, Section 5 of SB 859 defines "disadvantaged community" for this program as a community identified pursuant to Section 39711 of the Health and Safety Code (i.e., CalEnviroScreen) or pursuant to Section 75005 of the Public Resources Code (i.e., median household income less than 80% of statewide average). Further, the section requires that at least 75% of the moneys available for the program go to projects located in and providing benefits to disadvantaged communities. However, California Natural Resources Agency staff appear to be targeting only CalEnviroScreen-identified disadvantaged communities for this minimum 75% set-aside – a more narrow interpretation not required by the statute.

We urge the final program guidelines to make clear that disadvantaged communities as defined through median household income are also eligible for this minimum 75% set-aside, in order to make this important program more accessible to communities in need.

Thank you for your efforts in administering this program. MTC looks forward to working with project sponsors in our region, and you and your staff, to implement the Urban Greening program. Please contact me at 415-778-6722 with any questions.

Sincerely,



Anne Richman
Director, Programming and Allocations

AR: CB

J:\PROJECT\Funding\Cap and Trade\letters\external letters\Urban Greening Guidelines 2016.docx



December 5, 2016

John Laird, Secretary
California Natural Resources Agency
1416 9th St #1311
Sacramento, CA 95814

RE: Greenhouse Gas Reduction Fund Urban Greening Program Guidelines

Dear Secretary Laird:

Thank you for the opportunity to review and comment on the draft Urban Greening Program Guidelines (Guidelines) funded through the Greenhouse Gas Reduction Fund (GGRF). The East Bay Regional Park District (District) is pleased to see the creation of more walkable and bike-able trails included in the objectives. The District is a steward to over 120,000 acres in the east San Francisco Bay – one of the most urbanized regions of California – and operates 200 plus miles of paved active transportation trails. As such, the District is well positioned to support the State's efforts to achieve greenhouse gas (GHG) reduction goals while providing enjoyment and health benefits to the urban communities surrounding the parks.

The District offers a slight expansion to the definition of traditional urban greening projects. Though our parks are typically more passive and not akin to neighborhood, pocket or linear parks, the Park District has significant parks in highly urbanized parts of Oakland, Richmond and Fremont, and over 2.5 million residents in the counties of Alameda and Contra Costa. The grasslands, forests, wetlands, shorelines and open space managed by the District have an important role in protecting and growing carbon stocks on natural and working lands for the benefit of surrounding urban communities.

We thank your staff for the diligent efforts in developing these guidelines and support moving forward with the GHG reduction calculation methodologies being developed. On behalf of the seven elected members of the East Bay Regional Park District's Board, we respectfully submit feedback for your consideration:

I. Quantification (p.2):

- a. **Item 1:** We suggest changing this to "[s]equester and store carbon by: planting trees, *restoring native habitat and/or replanting degraded areas.*" Trees are not the only way to create carbon sinks. Deep-rooted perennial grasses, fruiting plants and biomass mulching can contribute where trees are not appropriate. For example, projects that involve bioswales filter runoff and thus require less treatment of storm water and its associated energy consumption.
- b. **Scoring:** We suggest that GHG quantification be a pass/fail scoring criteria so projects must only meet a threshold of GHG emission reduction in order to be eligible and competitive for this program. Projects with the greatest GHG benefits may not provide the myriad of benefits this program is intended to provide to communities. For example, a tree planting project may be a better fit for other GGRF programs while an innovative, multiple-benefit project may not score well in the Air Resource Board's (ARB) approved methodology, but would provide multiple additional GHG benefits without a current quantification methodology.

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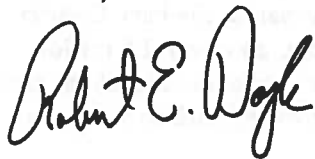
Ayn Wieskamp
Ward 5

Robert E. Doyle
General Manager

2. **Examples of Ineligible Projects of Applications (p.3) - 4th bullet:** We suggest the following changes: Projects that do not include the *acquiring of natural land for parks or green space*, planting of trees/*native vegetation* and/or a trail that provides active transportation opportunities.
3. **Accessible urban forests should be eligible for acquisition for their GHG benefits.** Urban forests acquisitions are allowable under the ARB Forest Protocol with two existing, widely-accepted quantification methods:
 - Improved forest management – to improve the management of a forest in an urban area so it sequesters more carbon.
 - Avoided conversion – to protect a forest from removal or fire and conversion to developed area.Improved forest management and avoided conversion generally are more powerful actions to sequester carbon than planting new trees.
4. **Project Evaluation - Riparian Habitat (p.17):** We understand the statute describes “riparian habitat” as an example, but the contextual language in the list of examples would indicate the questions might be better geared towards *natural systems or habitat* in general. Grasslands and forests are important sources of carbon sequestration and we suggest a change to *natural systems or habitat*.
5. **Plant palette (p.24):** A plant palette should only be required if it is applicable. A project may not involve planting.

Thank you for the opportunity to comment on the draft Urban Greening program guidelines. We look forward to continuing to work with you. Please feel free to contact us if you have any questions or would like additional support documentation.

Sincerely,



Robert E. Doyle
General Manager

cc: EBPRD Board Members
East Bay Legislative Delegation



California Natural Resources Agency
Bonds and Grants Unit
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

December 5, 2016

Leadership Counsel for Justice and Accountability
764 P Street, Ste. 012
Fresno, CA 93721

Re: Comments and Recommendations regarding the Draft Guidelines for California Natural Resources Agency's Urban Greening Grant Program funded by California Climate Investments

To whom it may concern,

Leadership Counsel for Justice and Accountability (hereinafter "Leadership Counsel"), directs this letter to the California Natural Resources Agency (hereinafter, "CNRA") and urges CNRA to consider the recommendations detailed below concerning the development of the agency's guidelines for its Urban Greening Grant Program funded by California climate investments. The Urban Greening grant program has great potential to address climate change in California and directly benefit communities most in need of environmental remediation, green community spaces and active transportation, and it is crucial to ensure that these communities are meaningfully engaged and benefit as much as possible from this program.

Leadership Counsel works alongside low income communities in the Central Valley and the Eastern Coachella Valley to ensure that development and investment are done sustainably and equitably, to further the wellbeing and opportunities of all of the region's residents regardless of race, nationality, socioeconomic status, or place.

We thank CNRA for hosting informative webinars and for providing the opportunity for comment on its draft program guidelines. We commend...

We commend CNRA for developing these guidelines with an eye towards disadvantaged communities. We are particularly encouraged by CNRA's planned oversight over projects by requiring transparent and regular reporting.

We look forward to receiving responses to our inquiries and suggestions below and look forward to continued dialogue and collaboration with CNRA as this policy develops.

Summary of Recommendations:

- 1. CNRA must provide all forms, guidelines and program documents in Spanish.**
- 2. CNRA must reduce the requirements for initial project applications.**

3. **CNRA must provide or facilitate technical assistance for communities or organizations with limited resources.**
4. **CNRA must include the definition of “critically underserved communities.”**
5. **CNRA must explicitly state that this program will not work against the interests of disadvantaged rural communities, and set aside 20% of the funds for disadvantaged rural communities.**
6. **CNRA must clarify its explanation of disbursement of funds, and waive the requirement for grantees to front the money if they can demonstrate limited financial resources.**
7. **CNRA must require reporting of community engagement.**

1. CNRA must provide all forms, guidelines and program documents in Spanish.

Application forms and guidelines are not currently in Spanish. These documents must be provided in Spanish so that native Spanish speakers may also participate meaningfully in this program.

John Melvin from CalFire’s Urban and Community Forestry program is currently investigating how CalFire can get their Urban Forestry forms and documents efficiently and accurately translated into Spanish. He would be a good resource to identify how to conduct translation.

2. CNRA must reduce the requirements for initial project applications.

The current program guidelines require applicants to provide a wealth of highly technical information in project proposals. This presents an obstacle for resource-limited communities and organizations to create project proposals.

To allow resource-limited communities and organizations to be engaged in and lead project proposals, CNRA must relax its requirements for the initial project application. CNRA should initially require only a short idea proposal, and establish a subsequent deadline for full project applications.

For example, CNRA could refer to ARB’s SEPs program, which allows applicants to first submit a short, basic and accessible idea proposal, and then requires a longer project application. This allows time for communities or organizations with good ideas but limited technical expertise to connect with technical assistance to create a full project proposal.

3. CNRA must provide or facilitate technical assistance for communities or organizations with limited resources.

Given the length and technical nature of final project proposals, CNRA must provide technical assistance to communities or organizations with limited resources. This can be provided either through funding or directly.

For example, the State Water Resources Control Board is using Prop 1 funds to fund community-based organization to work with communities to reach solutions for clean drinking water. This programmatic assistance by community-based organizations is critical for reaching the most underserved communities and ensuring their meaningful participation in programs that seek to target them as beneficiaries.

4. CNRA must include the definition of “critically underserved communities.”

The second provision under Statutory Priorities derived from SB 859, on page 4 of the draft guidelines, says that projects proposed by a “critically underserved community” or disadvantaged community will be prioritized. While the guidelines go on to amply define “disadvantaged community,” they do not do so for the term “critically underserved community.”

As it did with the “disadvantaged communities” term, CNRA must include the definition of “critically underserved communities” as set forth in Section 5642 of the Public Resources Code.

5. CNRA must explicitly state that this program will not work against the interests of disadvantaged rural communities, and set aside 20% of the funds for disadvantaged rural communities.

On page 5 of the Urban Greening program draft guidelines, CNRA specifies that projects must be in “urban areas.” This runs the risk of contributing to injustice, as it has historically been much more challenging for disadvantaged rural communities to access dollars for infrastructure. Additionally, unincorporated communities and smaller rural communities are among the communities with the most need for environmental health and remediation, and thus stand to benefit the most from urban greening projects.

CNRA must ensure that this program does not further isolate disadvantaged rural communities from infrastructure funds by explicitly stating that this program will not work against the interests of disadvantaged rural communities.

In addition, we respectfully ask that Urban Greening set aside 20% of the funds for disadvantaged rural communities.

6. CNRA must clarify its explanation of disbursement of funds, and waive the requirement for grantees to front the money if they can demonstrate limited financial resources.

On page 8 of the guidelines, CNRA specifies that grantees will be expected to pay out of pocket for project expenses, and will be reimbursed for “development projects.” Alternatively, CNRA states that grantees who cannot shoulder this financial burden can partner with a fiscal sponsor or agent.

CNRA must define what is meant by “development projects” and “acquisition projects.” Additionally, if the grantee is a community with limited resources, CNRA must allow the requirement to front money for the project to be waived. project. CNRA must give the grantees money before project implementation, or arrange fiscal sponsors for such communities with demonstrated need.

7. CNRA must require reporting of community engagement.

Leadership Counsel commends CNRA’s requirement that projects conduct quarterly reports, and is encouraged to see the transparency and oversight in CNRA’s plan to conduct regular oversight over projects and publish all quarterly reports on ARB’s website. However, one key factor that must also be reported on and overseen is community engagement throughout all stages of project design and implementation.

Communities must be actively involved and not simply passive beneficiaries of projects. This type of community leadership and engagement contributes to project sustainability and leads to community engagement for long-term outcomes.

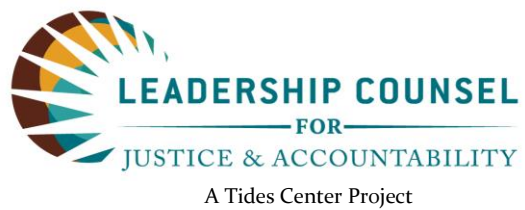
CNRA must require quarterly reporting to include measures of how SEPs conduct community consultations at every stage of the project, and how they are engaging community participation and leadership in the design and implementation of the project.

* * * * *

We look forward to working with the California Natural Resources Agency to ensure that its Urban Greening Grants Program effectively benefits and engages our state’s most underserved communities. We would be eager to provide more feedback based on the experiences of the residents and communities with whom we work. Please contact Amanda Monaco at amonaco@leadershipcounsel.org with any further questions.

Sincerely,

Amanda Monaco
Policy Advocate
Leadership Counsel for Justice and Accountability
764 P Street, Ste. 012
Fresno, CA 93721
amonaco@leadershipcounsel.org



December 5, 2016

Urban Greening Grant Program
% The California Natural Resources Agency
Attn: Bonds and Grants Unit
1416 Ninth Street, Suite 1311
Sacramento, CA 95841

Re: Draft Guidelines for the Urban Greening Grant Program

Dear Secretary John Laird,

On behalf of the Urban Forestry and Greening program committee of the California Climate Equity Coalition (CCEC), we submit the following comments pertaining to the California Natural Resources Agency (CNRA) Urban Greening Grant Program (UGGP) draft guidelines.

The California Climate Equity Coalition (CCEC) is an alliance of over 300 members representing 150 organizations across the state to ensure successful implementation of climate investments to disadvantaged communities (DACs), as originally established under SB 535 (De León) and AB 1550 (Gomez). Through our legislative and regulatory advocacy, we work to promote equitable policies and programs that serve the needs of communities disproportionately impacted by poverty and pollution.

We appreciate CNRA's hard work in drafting the UGGP guidelines and applaud its continued efforts to reduce greenhouse gases (GHGs) and achieve multiple benefits, especially in disadvantaged communities. However, we are particularly concerned that the guidelines do not clarify and specify the language around a) prioritizing meaningful community partnerships and b) incorporating and measuring economic benefits. We are eager to see the UGGP succeed, and offers the following recommendations to ensure that the spirit of AB 32, SB 535, and SB 859 remains.

Overview of Recommendations

1. **Community Partnerships & Education** must be incorporated into the guidelines and included as an allowable expense.
2. **Indirect Costs** associated with developing meaningful community partnerships should be an allowable covered expense.
3. **Local Economic Benefits** must be incentivized through the program guidelines and application questions contained within the "Statutory and Program Requirements" and "Statutory and Program Priorities" to accurately capture a project's economic benefits.
4. **GHG Quantification** raises questions regarding how CNRA will balance multiple benefits with GHG quantification focused on tree planting and vehicle miles traveled.
5. **Application Scores** should be attributed to each individual question instead of sections to increase transparency.

6. **Tribal Consultation** language should be more specific to meaningfully engage with tribal nations and avoid substantial harms.

1. COMMUNITY PARTNERSHIPS & EDUCATION

Community Partnerships

Currently, the UGGP guidelines do not provide sufficient guidance regarding meaningful community engagement and partnerships. The guidelines at various points refer to “citizen involvement” or “community involvement.” This threshold of “involvement” is vague and insufficient. Under this definition, an applicant could “involve” community members simply by sending informational mailers, without meaningfully incorporating community viewpoints and priorities into the project design.

We recommend that CNRA instead use the term “partnership” to describe the level of meaningful community engagement required for competitive projects.¹ “Partnership” implies close cooperation and shared responsibilities. Additionally, the terms of a contracted partnership can be easily verified through Memorandums of Understanding (MOUs) entered with local stakeholders.

The grant guidelines currently offer priority consideration to projects that have been “proposed by a critically underserved or disadvantaged community.”² This is a good first step. In addition to this priority consideration, the following requirements should be added to the “Other Requirements” listing on page 5 to ensure that all projects, whether or not they have been proposed by a critically underserved or disadvantaged community, are meaningfully engaging community members:

- *Projects shall demonstrate that they have authentically engaged the local community to develop the project.*
- *Projects shall have multiple benefits (economic, environmental and social) to the community and the multiple benefits shall be maximized.*

Recommendations:

- Remove references to “citizen” or “community involvement.” Encourage contracted partnerships between Community Based Organizations (CBOs) and city or county agencies.
- Make MOUs the standard of evidence for forming authentic community partnerships.

¹ Beginning on p.19 of the guidelines, under “Use Interagency Cooperation and Integration” *Urban Greening Grant Program Draft Guidelines (October 2016)*, 4, State of California Natural Resources Agency, <http://resources.ca.gov/grants/wp-content/uploads/2016/09/Urban-Greening-Draft-Guidelines.pdf>. (last accessed November 29, 2016).

² *Urban Greening Grant Program Draft Guidelines (October 2016)*, 4, State of California Natural Resources Agency, <http://resources.ca.gov/grants/wp-content/uploads/2016/09/Urban-Greening-Draft-Guidelines.pdf>. (last accessed November 29, 2016).

- Add the following criteria to “Other Requirements” on page 5 of the guidelines:
 - *Projects must show that they have authentically engaged the local community to develop the project*
 - *Projects must have multiple benefits (economic, environmental and social) to the community. Such benefits must be optimized.*

Education & Outreach

Community education and outreach is essential to obtain the support of community members for a project and to ensure the project’s long-term sustainability, especially for projects that involve long-term stewardship of green assets. For example, to ensure the success of a street tree planting project over the course of thirty years, it is crucial for the surrounding community to understand the basics of tree stewardship to prevent endangering the trees’ health.

The UGGP grant guidelines do not consider educational and training projects as eligible expenses.³ We ask CNRA to clarify what kinds of educational components could be considered an allowable expense. In defining educational components, CNRA should allow for activities such as flyering, educational materials, and workshops because these activities are necessary to meaningfully engage community members. CNRA should consider allowing education and outreach expenses similar to those in the CAL FIRE grants which not only require that projects have an education and outreach component, but also allow for 20% of the expenses to be dedicated to these educational activities⁴.

Recommendations:

- CNRA should clarify what kinds of education components can be considered as an allowable expense.
- CNRA should allow for activities, like flyering, educational materials and workshops as allowable covered expenses

2. INDIRECT COSTS

The grant guidelines do not allow for indirect/overhead costs as an allowable expense. Many CBOs track and account for overhead expenses such as rent, training, supplies and equipment on a project-by-project basis. Excluding these items as allowable expenses will favor applications coming from established entities such as cities or counties that likely have additional

³ Id. at 4.

⁴ “Education and signage (may not exceed 20% of costs): Purchase, development and distribution of education materials or events may be funded pending relevance to the scope of the proposed project. A maximum not to exceed 20% of grant request. Funding source and program sign construction and materials.” *California Climate Investments Department of Forestry and Fire Protection Urban and Community Forestry Program Grant Guidelines 2016/2017*, California Department of Forestry & Fire Protection, CalFire (2016). http://calfire.ca.gov/Grants/downloads/UrbanForestry/CAL%20FIRE_UCF_GRANT%20GUIDELINES_DRAFT%201-13-16.pdf. pp. 20, 23 (last accessed on September 17, 2016).

resources/support for these type of expenses, and exclude a share of applications from community based organizations (CBOs) who do not have such support. CNRA should clarify its definition of indirect costs.

CNRA should consider CAL FIRE's guidelines as they pertain to indirect expenses. CAL FIRE guidelines allow for indirect costs, capped at 10% of the budget. Specifically, CAL FIRE allows CBOs to bill for indirect costs associated with doing business of a general nature and which are necessary for the general operation of the organization, such as business services, information technology, janitorial, rent, utilities, supplies.⁵ We recommend that CNRA allow indirect expenses and cap indirect costs at a percentage of the total budget that CNRA deems reasonable, but not less than 10% of the total budget.

Recommendations:

- CNRA should clarify its definition of indirect costs to account for costs not directly associated with a project.
- Allow for indirect costs not directly associated with the project but essential to building community partnerships and to account for overhead costs often incurred by CBOs.
- CNRA should consider CAL FIRE's indirect costs guidelines and allow for indirect costs at a percentage, but not less than 10% of the total budget.

3. ECONOMIC BENEFITS

We understand that CNRA is bound by SB 859 with respect to acceptable multiple benefits that a project can yield. However, it is essential for UGGP to delineate the importance of economic benefits as a necessary element in the success of urban greening projects. Economic benefits may be satisfied through workforce education and training, creation of quality jobs, and procurement of goods from local minority or women owned businesses. The investments *in* the community should parallel the investments made *to* the community. Thus, we recommend CNRA to adopt the following changes to ensure the letter and spirit of SB 859:

Statutory Requirements: Section J⁶

- Question 4 (J)(1): Delete the following language on the last bullet point labeled, "other co-benefits to public health": *hiring/training local disadvantaged youth* because hiring and training local disadvantaged youth is not a co-benefit of public health.

⁵ *California Climate Investments Department of Forestry and Fire Protection Urban and Community Forestry Program Grant Guidelines 2016/2017*, California Department of Forestry & Fire Protection, CalFire(2016). . http://calfire.ca.gov/Grants/downloads/UrbanForestry/CAL%20FIRE_UCF_GRANT%20GUIDELINES_DRAFT%201-13-16.pdf. p.38 (last accessed on November 17, 2016).

⁶Id. at 18.

- Add bullet points under question J(1) to highlight examples of economic benefits to disadvantaged communities:
 - *Provides access to workforce education, training, and quality jobs for residents of disadvantaged communities and individuals with barriers to employment.*
 - *Procurement of goods with businesses located in disadvantaged communities or minority- or women-owned businesses.*
- Question 4(J)(2): Amend to “Identify specific efforts or strategies to ensure that disadvantaged communities and/or neighborhoods will realize these *co-benefits*.”
- Question 4(J)(3): Delete this question. “Citizen involvement” is not a co-benefit. Community engagement and partnership are necessary for a project to successfully respond to community needs and meaningfully incorporate the participation of community members through the planning and implementation of the project. This question should not be included in this section unless CNRA seeks to include this question as part of workforce education and training. If that is CNRA’s intent, then the question 4(J)(3) should ask “*Specify how the project shall maximize workforce education and training in project planning and implementation.*”
- Question 4(J)(4): Delete or reword the question (*Describe how the project will use state or local youth employment programs...*) to include quality employment for all residents of disadvantaged community that provides a living wage, health benefits, and a career path. We appreciate CNRA’s effort to include youth, however, UGGP guidelines should encourage projects to provide stipends to all residents of disadvantaged communities and an opportunity for all to obtain full-time employment at living wage.
- Question 4(J)(3-4) Replace these questions with the following:
 - (3) *How will the project maximize access to workforce education, training and quality jobs to residents of disadvantaged communities and individuals with barriers to employment?*
 - (4) *How will the project maximize contracting with businesses located in disadvantaged communities or minority-or women-owned businesses?*
- Question 4(J)(5): Delete or rephrase this question (*Does the project use California businesses?*) because it is too broad and fails to capture any meaningful data. Instead, UGGP should seek to incentivise local economic workforce and development. CNRA should rephrase this question to state “*How will the project ensure supplier diversity and procure goods from local businesses, businesses located in disadvantaged communities or minority-or women-owned businesses?*”

Statutory and Program Priorities:

Developing partnerships for outreach and developing partnerships to provide access to quality jobs are two distinct but important measures of how well a project meaningfully engages with communities and provides economic benefits. Under the Evaluation/Scoring criteria listed on page 4, under “(2) Statutory and Program Priorities (per SB 859)” CNRA should break up the third bullet point into separate sections:

- 1. Develop partnerships with local community organizations in order to strengthen outreach to disadvantaged communities.*
- 2. Contract with local community organizations and businesses to provide access to quality jobs for residents of disadvantaged communities, or access to workforce education and training.*

Similarly, in the questions contained within the grant application itself, CNRA should use more specific language on page 19 under “Develop partnerships with local community...” question. CNRA should include the following two questions to distinguish between community partnerships and business partnerships:

- 1. Discuss how the project will develop partnerships with local community organizations in order to strengthen outreach to disadvantaged communities.*
- 2. Discuss how the project will contract with local minority or women owned businesses to implement the project, increase supplier diversity and provides access to quality jobs for residents of disadvantaged communities, or provides access to workforce education and training.*

4. GREENHOUSE GAS QUANTIFICATION

UGGP guidelines currently require projects to show a net GHG reduction by incorporating at least one of three activities: 1) Sequester and store carbon by planting trees to shade buildings; 2) Reduce building energy use from strategically planting trees to shade buildings; or 3) Reduce commute, non-recreational and recreational vehicle miles travelled (VMT) by constructing bicycle paths, bicycle lanes or pedestrian facilities.⁷ These GHG quantification methodologies strongly favor tree planting. CNRA must clarify how the agency will evaluate projects that include other elements that provide green infrastructure benefits such as bioswales or riparian habitats. Further, UGGP and CAL FIRE’s Urban & Community Forestry Program rely on similar GHG reduction methodologies, and CNRA should clearly indicate how its grant program differs from the CAL FIRE program.

⁷Urban Greening Grant Program Draft Guidelines Funded By California Climate Investments, State of California Natural Resources Agency (2016). <http://resources.ca.gov/grants/wp-content/uploads/2016/09/Urban-Greening-Draft-Guidelines.pdf>. (last accessed on November 17, 2016).

Recommendation:

- CNRA should provide applicants with a minimum GHG reduction threshold for green infrastructure projects.
- CNRA should more clearly indicate how this grant program differs from CAL FIRE Urban Forestry program.

5. APPLICATION SCORING

Applications are scored out of a total of 125 points, and points are attributed not to individual questions but to seven broad categories.⁸ For example, the first section on “Statutory and Program Requirements” contains four mandatory questions followed by a long series of sub-questions which are scored out of a total of 50 points. However, these points are not allocated to individual questions, but to the section as a whole. We are concerned that this scoring system will lead to arbitrary scores that do not correspond to the answers provided. To increase transparency and clarity, CNRA should attribute points for each question within each individual section rather than provide one score per section.

Recommendation:

- At minimum, CNRA should give each question within a category, a point range to eliminate arbitrary project evaluation and maintain an applicant’s project flexibility.

6. TRIBAL CONSULTATION

The application states that applicants “should make every effort to involve Native American Tribes or stakeholder groups as appropriate.” Although textually, the word “should” makes it a requirement for applicants to put forth an effort, CNRA does not indicate how it will measure such an effort. We suggest that CNRA make this requirement more specific and issue metrics to define “effort,” because hypothetically speaking, a newspaper or television advertisement aimed at tribes or stakeholders could be considered an “effort to involve.”

Recommendation:

- Provide for language in this section that is more specific and mandatory to avoid substantial harms and displacement.

CONCLUSION

In conclusion, we recommend CNRA: 1) incorporate community partnerships in the guidelines; 2) Allow for indirect costs as an allowable covered expense; 3) Incentivize projects to capture

⁸ The seven categories include 1) Statutory and Program Requirements; 2) Statutory and Program Priorities; 3) Disadvantaged Communities; 4) Statewide Park Development and Community Revitalization Act; 5) Additional Project Characteristics; 6) Project Readiness; and 7) Organizational Capacity.

and maximize local economic benefits; 4) Provide applicants with a minimum GHG reduction threshold for green infrastructure projects; 5) Score individual questions in the application instead of sections to increase transparency; and 6) Include more specific language in tribal consultation requirement to meaningfully engage with tribal nations and avoid substantial harms.

Thank you for the opportunity to be part of these guidelines, we look forward to working together to maximize the benefits of UGGP grants for disadvantaged communities, low-income individuals and prospective applicants.

Sincerely,

Chuck Mills, Public Policy & Grants Director
California ReLeaf

Emi Wang, Environmental Equity Program Manager
The Greenlining Institute

David Jaber, Advisor
Growing Together

Amanda Monaco, Policy Advocate
Leadership Counsel for Justice & Accountability

Dillon Delvo, Executive Director
Little Manila Foundation

Mark Kenyon, Executive Director
North East Trees

Veronica Padilla,
Pacoima Beautiful, Executive Director

Mary Creasman, California Government Relations Director
Trust for Public Land

Urban Greening Grant
Open Comment Period Discussion
Due December 5, 2016

The City of San Jose's comments/questions on the Urban Greening grant program:

1. There was a question during the Sacramento (10.31.16) Public Meeting regarding the City of Oakland who also has a CalFIRE grant. What was the final conclusion to that question asked? Could cities that have both a CalFIRE grant and an Urban Greening grant use the funds interchangeably? Also can we combine the Urban Greening grant with any other grants both Federal and State grants, administered by various agencies?
2. Can the grant pay for all the following transportation-related improvements:
 - New streetlights and LED conversions of existing streetlights
 - Enhancement and upgrades of pedestrian ramps and crosswalks
 - Traffic signal improvements including, but not limited to, relocation of traffic poles, mast arms, pedestrian push buttons, streetlight poles, and bollards
 - Relocation of traffic signal and utility boxes and vaults to improve visibility and accessibility, and to allow room for park strips, trees, and pedestrian ramps
 - Excavation required to upgrade sidewalks, ramps, install medians, and install irrigation or supportive structures for trees
 - Bicycle racks, bike lockers or other bike parking infrastructure that encourages mobility and active transportation
 - Class I, II, III and IV bicycle facilities (as defined by Caltrans standards).
 - Public Bike Share stations
 - Signage – Under Appendix G Sign Guidelines (page 34) it indicates that there must be signs installed during construction and 4 years after project completion. Does this include ongoing signage such as wayfinding, identification of bikeways, and kiosks that include descriptions of storm water features and benefits? Do we need to follow MUTCD guidelines for street signs? Are there any guidelines or need to approve the design of kiosks and other signs?
 - Pavement treatment – Under the draft guidelines (page 3) it says projects that include non-permeable surfaces, such as concrete or asphalt are not allowed, unless they are utilized as part of a project to reduce greenhouse gas emissions related to VMT or other sources. Does this include dig outs, slurry sealing, and microsurfacing treatment/maintenance?
 - Suspended pavement systems to increase soil volume around new or existing trees.
3. Although indirect/overhead costs are not allowed as a separate billable item, but can these costs be built into personnel costs of project management/non-construction which is allowed up to 25% of the grant funds (this includes pre-implementation costs such as CEQA compliance, environmental assessments, planning and design, architecture and engineering, construction plans, permitting, direct project administration and management). On page 36 of the draft guidelines it lists an exclusion on overhead allocations?
4. Also does project management need to be pulled out as a separate line items during different phases of the project: design, right-of-way, and construction?
5. On page 5 of the draft guidelines it specifies that “Match funds are not required for this program. However, projects that leverage other sources of funds will be more competitive.” So if an agency wants to volunteer a local match, what is required to provide proof of local match upon the application?

Urban Greening Grant
Open Comment Period Discussion
Due December 5, 2016

6. Will the final guidelines make use of CalEnviroScreen 3.0 scores as opposed to CalEnviroScreen 2.0 scores currently indicated to identify disadvantaged communities?
7. Can funding be used for the operations and maintenance of programs and facilities such as
 - Community Based Social Marketing or Transportation Demand Management Programs that serve underserved communities, provide access to and connect parks, and/or reduce greenhouse gas emissions by reducing single occupant vehicle (SOV) trips?
 - Bike parking programs and facilities such as bike corrals, electronic bike lockers, bike cages or bike stations
 - Bicycle facilities (e.g., sweeping, filling potholes, repainting fading roadway stripes or damaged street signs, etc.)
 - Public Bike Share stations



December 5, 2016

Urban Greening Grant Program
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Urban Greening Grant Program DRAFT Guidelines

To The Urban Greening Grant Program Team:

As the “boots-on-the-ground” community non-profits charged with greening our Golden State through urban forestry, we are very excited to see the Urban Greening Grant Program draft guidelines reflect new opportunities to further this mission. We are hopeful this program will support myriad projects that have gone unfunded through the Climate Investments Program to date, including local parks and other green infrastructure.

While there is much to applaud in the draft guidelines, including the scope of eligible projects and priority consideration for disadvantaged communities, there are a few areas in which we believe further clarification and consideration of critical programmatic elements would result in a more robust program with greater diversity of project proposals and applicants as follows:

1. Expand quantification methodology for proposed projects.

As the draft guidelines note that “quantification methodologies are currently in development by ARB,” we will reserve detailed comments for that Agency. However, we must note that while we support all three proposed methodologies, we believe additional methodologies such as avoided conversion, energy conservation from stormwater capture/recharge, and even avoided food miles travelled will promote additional project types that include bio swales, urban orchards, and protected green space. While all of these projects are eligible under the proposed program, they are not incentivized by the quantification methodologies proposed, and may therefore be less competitive.

2. Incorporate indirect costs as eligible expenses.

The proposed guidelines do not support indirect costs as eligible expenses. As noted in in Appendix P, “these costs are not usually identified specifically with a grant, grant agreement, project or activity, but are necessary for the general operation of the organization” [emphasis added].

As a necessary component of operations, most, if not all, community benefit organizations (CBOs) rely on state-sponsored grant programs to support a small piece of their indirect costs so that they can provide continued benefit to California by delivering high-quality projects at an overall reduced cost. The critical need to incorporate a small allowance for indirect costs is recognized by all other departments under the California Natural Resources Agency administering Climate Investment Program funds, including DFW's Wetlands Restoration Program and CAL FIRE's Urban and Community Forestry Program.

There is tremendous concern among stakeholders that an Urban Greening Program that does not allow for some indirect costs will inadvertently remove many nonprofits and CBOs with demonstrated records of success from the process. For this reason, we would encourage the CNRA to allow applicants to include up to 10% of the project proposal budget for indirect costs.

3. Require authentic community engagement.

The draft grant guidelines give priority consideration to projects that have been "proposed by a critically underserved or disadvantaged community," and reference "community involvement" as well. We support both of these programmatic elements, but are concerned that, as currently drafted, CNRA's intent of encouraging meaningful community participation and input could be supplanted by more superficial efforts that may meet the proverbial "letter of the law," but not the spirit of authentic community engagement. Experiences in disadvantaged communities across the country have shown that involvement and engagement of the residents in projects to change their neighborhoods is critical to project acceptance and long-term success – especially trees.

Therefore, we would encourage CNRA to augment the Guidelines to more directly address community involvement by promoting authentic community engagement that can be quantified by assessing the degree to which the applicant has reached out to the community about the project, how that outreach informed the proposed project, and the ways in which the community will be involved in project implementation.

4. Add more specificity regarding trees.

Trees are the driving mechanism in 2/3 of the existing program quantification methodologies. If this holds, most projects with any significant GHG reductions will include a substantial tree component. However, there is concern among stakeholders about whether or not the directive "primarily plant non-native/high or moderate water plants" extends to the tree palette that CNRA will accept under this program.

Native trees are generally not suited to urban conditions. They have difficulty adapting to the urban environment, thereby substantially reducing survivability. According to *California's Guide to the Trees Among Us*, only 6% of California's urban trees are native to California. As an example, the approved list of street trees for the City of San Francisco includes no trees native to San Francisco. In Oakland, two of the 48 allowed species are native.

In addition, while all Californians must continue to be conscientious of the ongoing drought, we must also recognize that large trees with large trunks sequester the most carbon – and trees require a certain amount of water to reach their maturity. CNRA's inclusion of the WUCOL's web page in Appendix B will help guide applicants in appropriate species selection regarding water usage for each tree, but a brief narrative within the guidelines addressing this unusual dynamic may be warranted.

Combined, these two limitations as proposed will severely restrict the opportunity to achieve meaningful GHG reductions through tree planting and energy conservation from shade trees.

Therefore, we would encourage CNRA to add SelecTree (<http://selecttree.calpoly.edu>) to Appendix B as an appropriate resource for applicants to utilize when determining which tree species to include in their proposal while also discussing the need for diverse species within the guidelines.

We believe these recommendations, coupled with others received from our environmental justice and natural resource allies, will further advance the overall objectives with regards to meeting GHG reduction, sustainable community and social equity goals of this new and exciting Climate Investments Program.

Thank you for the opportunity to provide comments on these draft guidelines.

Sincerely,



José González
Latino Outdoors



Jean Nagy
Huntington Beach Tree Society



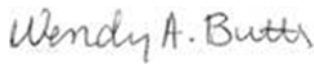
Ray Tretheway
Sacramento Tree Foundation



Rhonda Berry
Our City Forest



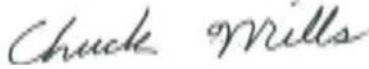
Ken Knight
Your Children's Trees



Wendy Butts
Los Angeles Conservation Corps



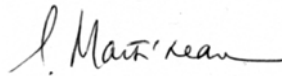
John So Hong
Koreatown Youth and
Community Center



Chuck Mills
California ReLeaf



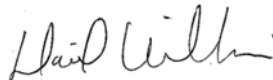
Sharon Romano
Los Angeles Beautification Team



Catherine Martineau
Canopy



Wendy Ramallo
Council for Watershed Health



David Wilkinson
Woodland Tree Foundation



Doug Wildman
Friends of the Urban Forest



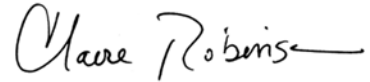
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Corps of the Inland Empire



Alvaro Sanchez
Greenlining Institute



Laurie Broedling
Tree San Diego



Claire Robinson
Amigos de los Rios



Gail Church
Tree Musketeers



Leo Buc
Common Vision



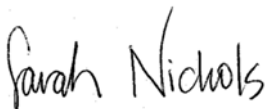
Teri Katz
Richmond Trees



Amelia Oliver
Roseville Urban
Forest Foundation



Nathan Higgins
Community Services
Employment Training



Sarah Nichols
Solano Advocates
Green Environments



Nicholas Mueller
Greater Valley
Conservation Corps



Melissa Iger
Tree Foundation of Kern



Jackie Heyneman
Save Our Forest



Hal McMath
Industrial District Green



Robert Chavez
Urban Corps of San Diego County



Darleen DeMason
Victoria Avenue Forever



Lee Ayres
Tree Fresno



Bryan Tassey
Tree Partners Foundation



Deborah Weinstein Bloome
TreePeople



Mark Kenyon
North East Trees



December 5, 2016

Urban Greening Grant Program
c/o The Natural Resources Agency
Attn: Bonds and Grants Units
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Comments on the Urban Greening Grant Program Draft Guidelines

On behalf of the Santa Clara Valley Open Space Authority, I am pleased to submit the following comments on the Natural Resources Agency's Draft Guidelines for the Urban Greening Grant Program. The Santa Clara Valley Open Space Authority is a special independent district that was created by the Legislature to balance urban growth through efforts that preserve key portions of the natural environment.

The Santa Clara Valley Open Space Authority strongly supports the overall purpose and intent of the Urban Greening Grant Program, which promotes sustainability and the incorporation of open space in developed communities. We are happy to see a significant amount of GGRF funds allocated to this important greenhouse gas reduction strategy, and we are confident that the program will produce numerous environmental and social benefits to urban communities. The Santa Clara Valley Open Space Authority specifically appreciates the inclusion of climate change resilience co-benefits among the Project Evaluation Criteria. We would like to encourage further highlighting the importance of this element in the initial discussion of Eligible Urban Greening Projects, as well as in Project Evaluation Section 5d, where specific questions regarding climate resilience could be added to the questions regarding Tree Canopy.

We applaud the prioritization of projects that benefit disadvantaged communities (DACs). Over 150,00 residents in the Santa Clara Valley Open Space Authority's jurisdiction fall under the two categories specified in the guidelines (CES 2.0 or 80% of the statewide income). We encourage maintaining both of these criteria for defining DACs. Erosion of the 80% state income level, or transitioning to CES 3.0 (currently in draft form), would significantly neglect many of the communities in our jurisdiction that could hugely benefit from the program.

At the Santa Clara Valley Open Space Authority, we believe that involving the community in urban projects is an integral way to materialize social benefits and provide for long-term project sustainability. We have seen that when local residents are engaged in the design, construction, and care of their urban greening projects,

the associated social benefits are amplified while costs are minimized. We see a huge opportunity here and encourage the incorporation of these types of community building elements explicitly into the program guidelines.

Overall, the Santa Clara Valley Open Space Authority is pleased with the general direction of the Urban Greening Grant Program, and we look forward to seeing the draft quantification methodologies when they are published.

Sincerely,

A handwritten signature in blue ink, reading "Andrea Mackenzie". The signature is fluid and cursive, with a long, sweeping tail on the "z".

Andrea Mackenzie
General Manager



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Los Angeles River Center & Gardens
570 West Avenue Twenty-Six, Suite 100
Los Angeles, California 90065
Phone (323) 221-9944 Fax (323) 221-9934

December  2016

Urban Greening Grant Program
c/o California Natural Resources Agency
Attn: Bonds and Grants Unit
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
E-mail: urbangreening@resources.ca.gov

**Public comment on October 2016 draft
Urban Greening Grant Program Guidelines**

To Whom It May Concern:

The Mountains Recreation and Conservation Authority (MRCA) would like to congratulate the California Natural Resources Agency on the completion of the Urban Greening Grant Program Guidelines (Guidelines). This Grant Program is an important opportunity to provide funding for much needed carbon sequestration, reduction of Green House Gases (GHG) and multiple benefit projects overall.

The MRCA is dedicated to the preservation and management of local open space and parkland, watershed lands, trails, and wildlife habitat. The MRCA works in cooperation with the Santa Monica Mountains Conservancy and other local government partners to acquire parkland, participate in vital planning processes, and complete major park improvement projects. These parklands increase recreation opportunities, create open space in urban areas and contribute to improved water quality, as well as incrementally augmenting the region's native ecosystems. We offer the following comments on the Draft Guidelines:

Eligible Urban Greening Projects

The Guidelines provides examples of eligible urban greening projects. One listed example is, "non-motorized urban trails that provide safe routes for travel between residences, workplaces, commercial centers, and schools." There is no mention of regional trails or park trails within an urban area. We would recommend that regional and park trails are specifically added and considered to be part of the eligible projects.

Eligibility Check List

The eligibility check list instructs users to answer various yes or no questions regarding their project. However,, the checklist seems to be geared specifically toward development projects. For acquisition projects, the answer to question #3 would be 'no', presumably rendering the application ineligible. Consider adding another question: "If no, is this an acquisition project?"

Also, consider adding language that clearly notes if any answers indicate no, then the project is ineligible.

Acquisition projects

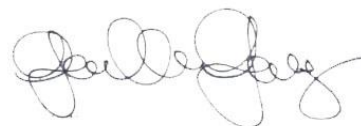
What are the guidelines for Acquisition projects? The Guidelines state that they are eligible, but are silent on the specific eligibility and requirements. Will there be a separate set of questions for Acquisition-specific projects? Additionally, how will / can those types of projects be appropriately quantified in order to be competitive through this grant program?

Statutory and Program Requirements 5(b)

The Guidelines currently provides questions regarding trees, however no specific mention of native species was addressed. Consider the advantage of projects that utilize "climate appropriate, drought tolerant native trees and shrubs" and provide a question that addresses those species and the environmental benefits associated.

We appreciate the opportunity to comment. Please direct any questions and further correspondence to Gabriella Golik Garry at (323) 221-9944 ext. 200 or gabriella.garry@mrca.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gabriella Golik Garry', with a stylized, cursive script.

Gabriella Golik Garry
Project Manager



"For Solutions Above & Below the Waterline"

5001 Neilson Rd, Mokelumne Hill, CA 95245

Mailing: PO Box 467, Mokelumne Hill, CA 95245

Visit us online at: www.floatingislandswest.com

Office: (866) 798-7086 & (209) 286-1445

November 29, 2016

Urban Greening Grant Program
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Re: Comments on Draft Guidelines for Urban Greening Program

Dear California Natural Resources Agency Urban Greening Program staff,

Floating Islands West strongly supports the Urban Greening Program and appreciates the opportunities to provide comments on the draft guidelines.

Floating Islands West, a California-based company, has developed and manufactures BioHaven® Floating Treatment Technology that is a cost-effective alternative approach for water quality, habitat enhancement, and wetland restoration. Floating islands create an ecosystem that mimics nature's wetlands and natural floating islands to improve water quality, create green habitat, provide erosion protection, improve aesthetics and enhance parks and open space. Specifically, the islands provide a foundation to expand the habitat for plants, fish, wildlife and beneficial microbes – as well as increase carbon sequestration and reduce greenhouse gases. The roots provide a surface area for beneficial microbes that clean water and absorb pollutants, such as excess nitrogen fertilizers, to help provide water quality benefits and prevent algae blooms. In addition, the islands help protect on-shore wetlands from erosion, as well as provide opportunities for recreational use to help transform the built environment into places that are more sustainable, enjoying and effective in creating healthy and vibrant communities.

Floating Islands West supports the statutory requirements (SB 859) for projects to use natural systems or systems that mimic natural systems to achieve multiple benefits, including improving water quality and riparian habitat for other public and wildlife benefits. Our specific comments include:

- We support the inclusion of planting trees as a means to sequester and store carbon to reduce greenhouse gas (GHG) emissions, and respectfully request the inclusion of fast-growing, high sequestration rate plants as eligible projects in order to help further reduce GHG emissions.
- We encourage the Natural Resources Agency to host public working groups for interested parties to provide opportunities for partnership and dialogue to develop large-scale, multi-benefit projects.

We appreciate the opportunity to provide comments and look forward to continuing to work together to reduce greenhouse gasses while transforming the built environment into places that are more sustainable and effective in creating healthy and vibrant communities.

Sincerely,

Laddie Flock
CEO

Floating Islands West, LLC

Cell Phone: (209) 609-9169

E-mail: laddie@floatingislandswest.com

November 29, 2016

John Laird, Secretary
California Natural Resources Agency
1416 9th St #1311
Sacramento, CA 95814

Secretary Laird,

Thank you for the opportunity to review and comment on the draft Urban Greening Program Guidelines (Guidelines) funded through the Greenhouse Gas Reduction Fund. We applaud the thoughtful approach your staff has taken in developing the Guidelines and respectfully submit the feedback below to strengthen them. With a 40+ year history of building parks and greening our urban environment, as well as preserving thousands of acres of forests and landscapes for the enjoyment of current and future Californians, The Trust for Public Land remains committed to helping to achieve greenhouse gas (GHG) reductions while providing essential benefits urban communities in need through this competitive grant program.

Overall, we support moving forward with the GHG reduction calculation methodologies being developed by ARB this year. However, we recommend that the guidelines reflect a long-term vision that leaves the door open to additional methodologies that may better reflect the wide-reaching GHG benefits of the project types described in the SB859. Thus, our comments around water resources and acquisitions are meant to suggest adjustments to the guidelines to make them more evergreen and adaptable to the potential development of new alternative methodologies in the future.

1) Quantification (p.2):

- a) We suggest changing 1. to "[s]equester and store carbon by: planting trees, *restoring native habitat and/or replanting degraded areas.*" Trees aren't the only way to create carbon sinks: deep-rooted perennial grasses, fruiting plants and biomass mulching can contribute where trees aren't appropriate. For example, projects that involve bioswales filter runoff and thus require less treatment of stormwater and its associated energy consumption.
- b) In order for this program to be consistent with the legislative goals and language of SB859, we suggest the addition of "4. Avoid conversion of open space, limit sprawl, and reduce vehicle miles travelled by acquiring green space in urban areas and extinguishing development rights." As currently written, there is no way for this program to implement the express language SB 859 to support projects that "acquire....community parks and green spaces." The value in extinguishing development rights to create parks and green space is great, not just to reduce GHGs but to create the "healthy and vibrant communities" described on p.2. Nevertheless, we understand that it may not be possible to create a functioning methodology for quantifying the benefits of an urban acquisition for this funding round. In that case, we recommend that you craft the guidelines to leave the door open to acquisitions as standalone projects in future cycles.
- c) **Scoring:** We suggest that GHG quantification be a pass/fail scoring criteria so that projects must only meet a threshold of GHG emission reductions in order to be eligible and competitive for this program. Projects with the greatest GHG benefits may not provide the myriad of benefits that this program is intended to provide to communities. For example, a tree planting project may be a better fit for other GGRF programs while

an innovative, multiple-benefit project may not score well in ARB's approved methodology but would provide multiple additional GHG benefits without a current quantification methodology.

- 2) **Statutory Requirements (p.2):** The last sentence in the first paragraph "all projects must be achieved by at least one of the following" is unclear and not consistent with the statute (p.2). Recommend using the statutory language "Per statute, all project must *do at least one of the following*." (See CA Gov. Code §12802.10(d)).
- 3) **Eligible Urban Greening Projects- Examples (p.3):**
 - a) We recommend that the guidelines ensure that all of the statutory benefits are included in the guidelines (e.g. multi-objective stormwater projects, wetlands and tree canopy).
 - b) If the guidelines move forward with the statutory benefits combined under the "examples" we suggest that "enhancement and expansion of neighborhood parks and community space" be changed to "*establishment*, enhancement, and expansion of parks and open space" in order to flow consistently from the project type "acquire, create, enhance or expand community parks and green spaces."
- 4) **Examples of Ineligible Projects or Applications (p.3):** Suggest the following changes:
 - a) 4th bullet: Projects that do not include the *acquiring of natural land for parks or green space*, planting of trees/*native vegetation* and/or a trail that provides active transportation opportunities.
 - b) 7th bullet: Suggest change to at *or below* fair market value.
 - c) 10th bullet: Suggest the removal of "acquisition-only projects that do not include development into an urban greening project." Per SB 859, Acquisition-only projects are expressly considered urban greening projects on their own (See CA Gov. Code 12802.10(d)(1)). Furthermore, there are multiple projects that would involve an acquisition that immediately creates a usable bike/pedestrian trail connection (e.g. would allow for the use of an existing trail or fire road). This appears again on page 8 and 14.
 - d) 11th bullet: Suggests change to Projects that include *more than 5%* non-permeable surfaces, including concrete or asphalt, except when they are utilized as part of the project to reduce GHG emissions related to vehicular miles travelled or other sources. A low percentage of non-permeable surfaces may be necessary to allow for trails and/or necessary facilities.
- 5) **Other requirements (p.5):**
 - a) **Potential project impediments:** "Projects must provide direct benefits to the urban areas such as walkability and/or functionality (i.e., no impediments such as a freeway with no under/over passing, river with no pedestrian crossing, storm water capture that does not directly benefit the urban area, etc.)" There are many projects where a bridge over a river, or an access point to a community park, were to be developed at a planned, but later date. Would these projects not be considered eligible for Urban Greening funding? For "bicycle paths, bicycle lanes, or pedestrian facilities" (see p.2) – would building a pedestrian bridge be an eligible expense? Please clarify permitted infrastructure.
- 6) **Acquisition Projects – reflecting the long-term intent of the program (p.8):**
Urban Acquisitions are explicitly defined as Urban Greening projects in SB 859: On p. 8, the draft guidelines state that "acquisitions must include development into an urban greening project as part of the project funded." However, SB 859 states unequivocally that an acquisition of a community park or green space is an urban greening project in and of itself. "The statute indicates that Urban Greening projects must do at least one of the following: Acquire, create, enhance or

expand community parks and green spaces.” (CA Gov. Code §12802.10(d)(1)). Thus, even if the GHG quantification methodology will render acquisition projects uncompetitive for this cycle, we recommend that the guidelines leave acquisitions as an eligible project and consider alternative ways to quantify the GHG benefits of acquisitions in future cycles.

The 10-Minute Walk: At The Trust for Public Land, we believe that every American should be able to walk to a neighborhood park or green space within 10 minutes. Parks are not extraneous amenities in communities; they are essential to our physical, mental, and environmental health. This program is built on a similar foundational principal that urban greening is essential to the creation of healthy and vibrant communities in the face of a changing climate. In urban communities that are critically underserved by parks (less than three acres of usable parkland per 1,000 or a disadvantaged community with insufficient park space or recreation facilities), this program should support and encourage urban greening projects that solely include the acquisition of properties for protection from development and their future development into parks and open space.

Calculating the GHG benefits of an urban acquisition: Urban acquisitions must, in these unique circumstances and based on the clear intent of SB 859, be considered a vital asset to our urbanizing state, and their GHG benefits calculated based on the avoided VMTs of development. One available tool for Resources to utilize to quantify the avoided VMT associated with an acquisition project is CalEEMod, which served as the basis of the quantification methodology associated with the Sustainable Agricultural Land Conservation Program, developed and approved by ARB. In that program, maintaining land in an undeveloped state (as a working farm or ranch) was determined to provide greater societal and climate resiliency benefits than development. Similarly, the Urban Greening program lays out the clear argument that urban acquisitions are of greater benefit to certain urban and underserved communities than development. We encourage adapting the SALC methodology to this program for any potential future rounds of funding.

Accessible urban forests should be eligible for acquisition for their GHG benefits. Urban forest acquisitions are allowable under the ARB Forest Protocol with two existing, widely-accepted quantification methods:

- Improved forest management – improve the management of a forest in an urban area so that it sequesters more carbon
- Avoided conversion – protect a forest from removal and conversion to developed area.

Improved forest management and avoided conversion generally are more powerful actions to sequester carbon than planting new trees.

Combination Acquisition and Development Projects- Issues: The guidelines suggest that combination acquisition and development projects may be necessary. See p. 3 under Examples of Ineligible Projects or Applications: “Acquisition-only projects that do not include development into an urban greening project.” We suggest that this requirement be removed, or in the alternative, that this requirement only apply to the current round of funding, pending approval of quantification methodologies for avoided conversion.

7) Project Evaluation (p.14)

- a) Disadvantaged Communities:** SB 859 outlines a process in which projects would be considered disadvantaged if they are solely located in a community with MHI below 80% statewide average. Thus, projects should receive points based on whether they are a Disadvantaged Community per *either* SB 535 and SB 859 (Community Fact Finder), not just SB 535. We understand that these thresholds are being determined by ARB, and we are submitting comments to this effect to them directly.
- b) Scoring (p.14):**

- As currently written (50 points for all Statutory and Program requirements combined) it is unclear to applicants what is required to score well. Will applicants earn more points the more questions they answer under question 5 starting on page 15? Although we firmly support Resources Agency in funding projects that are truly multiple benefit, asking applicants to answer *all* of the questions associated with each multiple benefit could be a hinderance to applicants with fewer resources or at smaller organizations. We suggest that Resources Agency take the approach that they took in the recent Prop 1 Urban Rivers competition, where applicants chose two benefits and answer the respective questions for these benefits. Resources can subsequently provide applicants with the opportunity to describe how the project meets additional benefits (beyond the mandatory two), for additional points.
 - Furthermore, the *not limited to* language leads us to suggest the addition of a final question "If the project addresses environmental issues not previously discussed, describe here" - *See Urban Rivers Guidelines 2015/16 p. 17.*
- c) **Tree Canopy (p.16):** We suggest adding "impermeable surface assessments" to d(1)
 - d) **Riparian Habitat (p.17):** We understand that the statute describes "riparian habitat" as an example, but the contextual language in the list of examples would indicate that the questions might be better geared towards *natural systems or habitat* in general. Grasslands and forests are important sources of carbon sequestration and we suggest a change to *natural systems or habitat*.
 - e) **Use existing public lands... (p.20):** This section seems to run counter to the intent of the SB 859. CA Gov. Code section 12802.10(E)(1) simply indicates that the "the greening of existing public lands and structures" is one potential benefit of a project. This benefit is recognized and scored on p.15 of the guidelines. SB 859 does not *prioritize* existing public lands and structures over any other benefit including the establishment or enhancement of a park or open space (*see* CA Gov. Code 12802.10(E)(4)). This program seeks to create public green spaces in urban communities, particularly in those communities that lack access to parks and open space. Existing public lands may not always be available for this work in critically underserved communities. We recommend that the question re: "was consideration given to the use of existing public lands?" on p.20 be removed.
- 8) **Plant palette (p.24):** A plant palette should only be required if it is applicable. A project may not involve plantings.
- 9) **Anti-displacement measures:** Given the anticipated, and sought-after improved economic outcomes of Urban Greening investment in DACs, we recommend that anti-displacement measures be required with use of program funds so that current residents and businesses are not priced out of their communities as a result of program benefits. The SGC's Affordable Housing and Sustainable Communities (AHSC) program sets a precedent for this, and we believe that anti-displacement strategies should be incentivized in project scoring. The AHSC program gives applicants a maximum of 4/100 points for anti-displacement strategies; we encourage Resources Agency to devote 10% of project scoring to promote enhanced anti-displacement measures.
- 10) **Character limits:** Based on our recent experience submitting applications to the Urban Rivers program, we recommend the following:
- a) Restrict answers to no more than 2000 characters
 - b) Add the character limits in SOAR to the Project Evaluation section questions in the guidelines

Thank you again for the opportunity to comment on the draft Urban Greening program guidelines. We look forward to working with Resources Agency in the continued development of this important program for communities throughout California.

Best regards,

A handwritten signature in cursive script, reading "Mary Creasman", followed by a long horizontal flourish.

Mary Creasman
Director, California Government Affairs
The Trust for Public Land

December 5, 2016

Urban Greening Grant Program
c/o The California Natural Resources Agency
Attn: Bonds and Grants Unit
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Submitted via email: urbangreening@resources.ca.gov

Re: Comments on the Draft Guidelines for the Urban Greening Grant Program

The Nature Conservancy appreciates the opportunity to submit comments to the California Natural Resources Agency in response to the Draft Guidelines for the Urban Greening Grant Program (hereinafter “Draft Guidelines”). Overall, the Draft Guidelines offer a strong foundation to leverage greenhouse gas (GHG) reductions in urban forests and other activities, and thereby help the state meet its long-term GHG reduction goals. We are especially pleased to see the requirement that projects provide at least two co-benefits (including riparian habitat, climate resilience, tree canopy, etc.). We offer the following recommendations to enhance greenhouse gas reductions and optimize co-benefits achieved through these projects.

The Guidelines should permit the use of funds for conservation easements to protect open space in urban areas and on the urban edge where there is risk of conversion and increased GHG emissions as a consequence.

Conservation easements provide a significant opportunity to produce enduring GHG reductions from the landscape. This voluntary legal instrument is an incentive for landowners to limit land conversion to other uses and guides management practices. These legal limitations will also help permanently secure the GHG reductions as easements are permanent and “run with the land” and, avoiding conversion of these lands would avoid significant GHG emissions associated with loss of vegetation and soil disturbance and would also maintain the ongoing sequestration benefits that these lands provide. When coupled with infill development, conserving land will also help constrain emissions associated with vehicle miles traveled (VMTs). In addition, the easements can permanently secure a host of other public benefits that are prioritized in the Draft Guidelines, such as recreation, public access, etc.

Greenhouse Gas (GHG) metrics for avoided land conversion are readily available through the forest protocols and already approved by the California Air Resources Board (ARB) for regulatory purposes. These protocols could easily be used to measure the GHG benefits of avoided conversion of open space in the context of the Urban Greening Program.

Finally, investments in conservation easements would be consistent with the program's intent and support a range of other climate and public policies (e.g., Sustainable Communities Strategies, greenhouse gas reductions from Natural and Working Lands in support of Governor Brown's Executive Order B-30-15, and the Air Resources Board's (ARB) Scoping Plan).

The Guidelines should prioritize projects that are part of larger, integrated climate plans.

The program should prioritize projects implemented pursuant to a larger, multi-sector climate plan, that includes urban greening and other natural and working lands, to reduce GHGs and optimize public benefits. Many local governments are developing multi-sector climate action plans to reduce emissions, that enhance reductions from multiple sources and optimize multiple benefits for communities.

The Guidelines should be linked the Vibrant Communities and Landscapes Vision for California in 2050.

The Vibrant Communities [Vision](#) from the Governor's Office of Planning and Research considers land use in the context of the California's climate change policy and how the State can support actions, at all levels of government, to facilitate development and conservation patterns that help to achieve the State's climate goals. The collaboration on the Vision included the following agencies: Business, Consumer Services and Housing Agency, California Environmental Protection Agency, California Natural Resources Agency, California State Transportation Agency, California Health and Human Services Agency, California Department of Food and Agriculture, the Strategic Growth Council, and the Governor's Office of Planning and Research. The Guidelines should align with this Vision, where applicable, and the program should be considered as support for the Vision.

We commend CNRA for its ongoing leadership to address climate change and recognition of the vital role urban greening plays in achieving our climate goals. We appreciate your consideration and look forward to working with you to support this effort. If you have any questions, please contact Alex Leumer at ALEumer@tnc.org.

Sincerely,

Alex Leumer,
Climate Policy Analyst

Comments on Urban Greening Grant Program

Submitted by Toni Moran, San Francisco Recreation and Parks Department.

| Page Number | Header | Details | Issue |
|-------------|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | Quantification | None | Can the State assure that the quantification tools are easy to use? Or perhaps provide training on how to use the tools? |
| 3 | Examples of ineligible Projects or Application | Project that include non-permeable surfaces | Most project will require <u>some</u> portion of impervious surface to address access by vehicles, and to meet ADA requirements. Also, if project is on brownfield, a A portion of the site may be capped to prevent access to contaminated materials. |
| 8 | Project Reporting and Performance. | | The reporting period should not exceed the project construction/completion period because capital programs do not provide project funding after the notice of completion has been filed. |
| 10 | Application Instructions | Preparing a Grant Application Package | Is doubles sided printing allowed? And is there a page limit? |
| 26 | Environmental Compliance | NEPA | In what case would NEPA be required if the project is not on federal land? |
| 36 | 1. Contingency | Contingency funds may not be used to increase the amount of funds that can be used for Project Management/non-construction/pre-implementation | Project Management/non-construction/pre-implementation. Should this be worded "Project Management incurred during the non-construction/pre- implementation construction phase? <i>Project Management cost are incurred during all phases of the project including the construction and close-out phases.</i> |
| 36 | 1. Project Management/non-construction. | 2 nd Paragraph unclear. "but is instead funded and implemented by entities independent of the State, and which rely in whole or in part of on the environment review.... | If the State provides pre-implementation funds to secure the environmental review, and in what cases would it not provide the full grant award? Does this mean no other entities can contribute funds to the project? If this is the case, it will make it impossible to close any cost overruns? Or was this intended to prevent increasing project scope? |

Urban Greening Grant Program,
California Natural Resources Agency,
1416 Ninth Street, Suite 1311,
Sacramento CA 95814

Regarding the proposed Urban Greening Grant Program, I would like to offer some feedback. As a concerned citizen and also a student of horticulture, including California native plants, I believe the guidelines, as currently drafted, will not increase California's urban tree canopies, because the program requires planting of "primarily" native trees. Draft guidelines for the Urban Greening grants refers applicants to the [California Native Plant Society](#) for their plant palette (see page 24 of guidelines). If applicants use this as the source of their plant palate, they will find few trees on those lists. This is another way to understand that if you want trees in California, most of them must be non-native. Most California native trees are not suitable as street trees because of their horticultural requirements and growth habits. Generally when selecting plants for a site, the considerations are: soil type, light, water requirements, etc. Limiting choices to native species will not work for many areas in California. If you want to increase the urban tree canopy to decrease greenhouse gasses and counteract global warming, you must allow non-native species in the guidelines. The California Native Plant Society website Native Plant List By Region is unacceptable. There are many links that do not work, and the lists are not categorized in a useable way. This website is a very poor resource for applicants wishing to come up with a list of trees to plant. Perhaps an excellent resource would be to include trees that are currently on the lists for urban tree planting in major cities such as San Francisco and Oakland, which include many non-native trees.

If you care about climate change, please create a grant program that will expand our urban forests and reduce the greenhouse gas emissions that are causing climate change. Restrictions against planting non-native trees must be removed from grant guidelines in order to increase our tree canopies in California's urban environments.

Sincerely,

Doriell Lautt





November 29, 2016

Urban Greening Grant Program
California Natural Resources Agency
1416 Ninth Street, Ste. 1311
Sacramento CA 95814

Re: Draft Funding Guidelines

Dear Sir or Madam,

The State of California California Natural Resources Agency (CNRA) has been allocated \$80 million to plant trees (and plants) in order to combat climate change. The stakes could not be higher.

Before European colonization, California was a largely treeless landscape and the few species of trees deemed “native” are dying in record numbers because of climate change. The U.S. Forest Service reports that “California’s lingering drought has pushed the number of dead [“native”] trees across the state past 100 million, an ecological event experts are calling dangerous and unprecedented... In its latest aerial survey ... the U.S. Forest Service said 62 million trees have died this year in California, bringing the six-year total to more than 102 million.”¹

In many, if not most cases, they cannot be saved and will not survive. Not only have roughly five million “native” oak trees also died over the last decade because of Sudden Oak Death, but a recent study called it “unstoppable” and noted that [by 2060] virtually all will succumb.²

Finally, the four “native” stands of Monterey Pine—the Año Nuevo-Swanton area in San Mateo and Santa Cruz Counties, the Monterey Peninsula and Carmel in Monterey County, and Cambria in San Luis Obispo County—are also in danger and not likely to survive.³

This is compounded by fears that the incoming new Administration in Washington, D.C., will reverse actions designed to combat climate change. An article in *National Geographic*

¹ Bodley, M., ‘Unprecedented’: More than 100 million trees dead in California, San Francisco Chronicle (Nov. 18, 2016).

² Cunniffe, N., et al, *Modeling when, where, and how to manage a forest epidemic, motivated by sudden oak death in California*, Proceedings of the National Academy of Sciences (May 2016).

³ Millar, C., *Reconsidering the Conservation of Monterey Pine*, Fremontia (Jul. 1998).

appropriately notes that, "The stakes for the United States, and the world, are enormous. If humankind does not reduce its greenhouse gas emissions immediately, climate scientists say, Earth could face as much as 11 degrees Fahrenheit of warming by 2100 relative to preindustrial temperatures, leading to increases in droughts and wildfires, rising seas, and major disruptions to global agriculture."⁴

It is, therefore, crucial for the CNRA to plant as many trees as possible in a manner that will yield the greatest possible outcome in terms of carbon sequestration, pollutant absorption, fire protection, energy reduction, and other climate benefits. Unfortunately, the draft guidelines fail to do so. Instead, the guidelines are written to appease special interests who want to turn the project into a source of funding for native plant gardens. Specifically, the *Urban Greening Grant Program Draft Guidelines* (Draft Guidelines) note that, "Projects that primarily plant non-native" plants and trees are "ineligible."⁵ It then refers potential grantees to the California Native Plant Society for "approved" species.⁶

The danger here is two-fold. First, few trees will be planted. In San Francisco, for example, no trees are considered "native" and therefore, San Francisco cannot be provided funding under the program despite having one of the smallest tree canopies in the country at 12%, undermining the goal of reducing building energy use by strategically planting trees to shade buildings. Likewise, Oakland only has one approved "native" tree species: Oak. Second, those which are planted are not likely to survive. As previously noted, Oak is expected to disappear completely by 2060.

If we are to get much from that \$80 million in terms of combating climate change, it is critically important that funding be allocated to plant as many urban trees as possible regardless of antecedents. Instead of focusing on whether trees are considered "native" or whether they are "native" to a specific area, the CNRA should focus on trees that are most likely to survive, be long-lived, and create significant tree canopies.

This is not lost on urban planners. In the last ten years, the City of Philadelphia has planted roughly 500,000 trees, many of which are deemed "non-native" precisely because so-called "native" trees do not survive. The City's Parks & Recreation Department noted that trying to restore the parks to what they may have looked like a century ago was a failure. Consequently, the city shifted to planting trees suited to warmer climates with great success.

⁴ Greshko, M., *The Global Dangers of Trump's Climate Denial*, National Geographic (Nov. 9, 2016).

⁵ State of California, *Urban Greening Grant Program Draft Guidelines*, California Natural Resources Agency (Nov. 2016), at p. 3.

⁶ *Id.* at p. 24.

Indeed, plants (including trees) and animals must move to more hospitable climates to survive warming temperatures and to help them do so, we must assist, not thwart the effort. California Redwood trees, for example, must migrate north to Oregon if they are to survive the devastating impacts of climate change.⁷ Saving Monterey Pine similarly requires “a new foundation for conservation strategies of the species and its associated ecosystems. If Monterey pine has long existed in small, disjunct populations and if these have regularly shifted in location and size over the California coast in response to fluctuating climates... then it would be consistent to extend our conservation scope... Areas not currently within its [narrowly defined so-called] native range could be considered suitable habitats for Monterey pine conservation.”⁸

Ironically, the fossil record demonstrates that Monterey Pine trees are, in fact, “native” to the San Francisco East Bay.⁹ Monterey Pine fossils from the middle Miocene through the Pleistocene have been found in several East Bay locations. Similarly, since Eucalyptus readily hybridizes with other species, many experts now claim that California Eucalyptus hybrids could rightly be considered native, too. Since the California Native Plant Society doesn't recognize them as such, however, projects to plant them are not eligible for funding even though they thrive, sequester carbon, absorb pollutants, protect against fire, and benefit the climate in countless other ways.

Only 6% of California’s urban trees are deemed “native.”¹⁰ Over 90% of California’s urban trees trace their origins outside of California simply because “native” trees do not thrive in urban environments. Despite the fact that Eucalyptus and other so-called “exotic” trees would render the greatest ecological benefit relative to climate change, projects to plant more of them are not ineligible for funding under the Draft Guidelines simply because they are deemed “non-native.”¹¹

⁷ Mathewson, S., *California Redwood Relocation: Earth's Largest Trees Shift Northward With Climate Change*, Nature World News (Oct. 18, 2015).

⁸ Millar, *supra*.

⁹ Perry, F., *The Monterey Pine through geologic time*, Monterey Bay Paleontological Society Bulletin (Jul. 2004).

¹⁰ Ritter, M., *California's Guide to the Trees Among Us*, Heyday Books (Apr. 2001).

¹¹ Eucalyptus trees are not only very fire resistant, they are majestic and beautiful, provide nesting sites for hawks, owls and other birds, are one of the few sources of nectar for Northern California bees in the winter, prevent soil erosion in the hills, trap particulate pollution all year around, and sequester carbon. Over 100 species of birds use Eucalyptus trees as habitat, Monarch butterflies depend on Eucalyptus during the winter, and Eucalyptus trees increase biodiversity. A survey in Berkeley's Tilden Park found 38 different species beneath the main canopy of Eucalyptus forests, compared to only 18 in Oak woodlands. Meanwhile, Eucalyptus trees also create an environment for other trees—like California Coast live Oaks and California Bay trees—to grow beneath them via fog drip. Fog drip, for example, has been measured in Monterey pines in the East Bay at over 10 inches per year. In San Francisco, fog drip in the Eucalyptus forest was measured at over 16 inches per year.

“Non-native” and “invasive species” are terms that have entered the lexicon of popular culture and become pejorative, inspiring unwarranted fear, knee-jerk suspicion, and a lack of thoughtfulness and moral consideration. They are language of intolerance, based on an idea we have thoroughly rejected in our treatment of our fellow human beings—that the value of a living being can be reduced merely to its place of ancestral origin.

Each species on Earth, writes Biology Professor Ken Thompson, “has a characteristic distribution on the Earth’s land surface... But in every case, that distribution is in practice a single frame from a very long movie. Run the clock back only 10,000 years, less than a blink of an eye in geological time, and nearly all of those distributions would be different, in many cases very different. Go back only 10 million years, still a tiny fraction of the history of life on Earth, and any comparison with present-day distributions becomes impossible, since most of the species themselves would no longer be the same.”¹²

This never-ending transformation—of landscape, of climate, of plants and animals—has occurred, and continues to occur, all over the world, resulting from a variety of factors: global weather patterns, plate tectonics, evolution, natural selection, migration, and even the devastating effects of impacting asteroids. The geographic and fossil records tell us that there is but one constant to life on Earth, and that is change. The Draft Guidelines must reflect this reality if we are to minimize the impacts of climate change.

In light of the incoming Trump Administration's anticipated catering to special interests by reversing policies and programs to combat climate change, it is especially important for California not to politicize its own efforts by bowing to a similarly loud and vocal minority who revere the “native” and disdain the “foreign,” at the expense of the overall goal sought (i.e., combating climate change). Unfortunately, that is what appears to be happening. That must change as the guidelines are finalized. As such, we respectfully request that the requirement that trees be “native” be stricken and that aggressive tree planting, regardless of the ancestral antecedents of those trees, not only be encouraged and funded, but—given their immense benefits—prioritized.

Very truly yours,

Nathan J. Winograd

¹² Thompson, K., *Where Do Camels Belong?: The story and science of invasive species*, Profile Books (Mar. 2014), at p. 3.

Furthermore, the guidelines do not reference the eligibility of tree maintenance, which we recommend be included for the purpose of tree establishment. Requiring property owners to regularly water a tree during its first three years of establishment has a very low success rate in disadvantaged communities. Without regular watering during establishment, a tree will not grow properly or can become very vulnerable and die. Therefore, we request that the guidelines allow the use of 24" box trees and include three years of watering. We believe that this will ensure that all investments in our urban forest, especially those in disadvantaged communities, reach maturity and fully realize their environmental benefits.

Tree Species

In several locations, the guidelines reference a requirement of native plants (pages 3, 17, 24, and 43). On page 3, the guidelines state that a project will be considered ineligible if it primarily plants non-native/high or moderate water plants. While the guidelines also refer extensively to tree planting requirements, it is not clear if native tree species are required and/or if non-native species are allowed. If the guidelines were to require planting primarily native tree species, we would caution that requirement and offer the following recommendation as an alternative for planting trees in constrained urban environments.

As a City, we strongly support planting native plants (such as shrubs, grasses, or succulents), however many native trees have been removed from our City's eligible street tree species due to large planting area requirements. The majority of our City's disadvantaged communities are constrained by small residential parkways, therefore excluding many species of native trees. We also believe that many non-native trees can provide sometimes even lower water use or greater drought tolerance than a native species. Therefore we request that the guidelines allow for planting non-native trees in constrained urban environments, such as tree wells, parkways, and medians.

GHG Reduction through Water Capture

In addition to the guidelines' quantification methodologies for GHG reductions through sequestering and storing carbon in trees, reducing energy use, and reducing vehicle miles traveled, we propose adding GHG reductions through water capture. Combining stormwater infiltration projects with these other project elements would ultimately reduce the amount of energy used to import water into Los Angeles.

Quantifying GHG reductions could include estimating the volume of stormwater capture directed to groundwater and the reduction of energy to infiltrate water from the State Water Project. We will be providing further comments on this quantification methodology to the ARB during their public comment period.

We greatly appreciate the opportunity to provide feedback on the draft guidelines for the Urban Greening program. I urge you to consider and implement our recommendations.

Sincerely,

A handwritten signature in blue ink, reading "Barbara Romero". The signature is fluid and cursive, with the first name "Barbara" and the last name "Romero" clearly distinguishable.

BARBARA ROMERO
Deputy Mayor, City Services



COMMENT CARD

Urban Greening Grant Program Draft Guidelines

To make a public comment, please complete and return this form to a Resources Agency staff member.

NAME: Jason Pinegar EMAIL: jpinegar@wca-inc.com

ADDRESS: 436 W. Scotts Ave Stockton 95203 PHONE: 2082106415

REPRESENTING: West Coast Arborists

SUMMARY OF COMMENT: We Service over 250 municipal agencies throughout CA, providing full service Tree mgmt. Will you consider adding additional qualifications - such as Urban Wood Utilization / Recycling. We recycle more than 100 Tons per day - every day. →
(Use reverse, if necessary)



COMMENT CARD

Urban Greening Grant Program Draft Guidelines

To make a public comment, please complete and return this form to a Resources Agency staff member.

NAME: John Mahoney EMAIL: patrickmahoney@gmail.com

ADDRESS: 191 Cobblestone Ln Anaheim Ca PHONE: 92807

REPRESENTING: West Coast arborists

SUMMARY OF COMMENT: benefits of using urban wood as ghg storage, supported by labor union, creates jobs, and hits all the goals of removing greenhouse gases.

(Use reverse, if necessary)



COMMENT CARD

Urban Greening Grant Program Draft Guidelines

To make a public comment, please complete and return this form to a Resources Agency staff member.

NAME: Darrell Patterson EMAIL: patterson@scag.ca.gov

ADDRESS: 1137 E 10th Street Long Beach 90813 PHONE: (562) 537-2509
(Street) (City) (Zip)

REPRESENTING: Southern California Association of Governments

SUMMARY OF COMMENT: It would be great to consider connecting the
the history, culture ^{through} and artistic ^(people's history + culture) framework of project place.

For example, signage that ^{pictures} ^{with} community and historical
plants/trees. Also, including a more extensive/emphasis on
outreach to disadvantaged communities and scoring to coincide
(Use reverse, if necessary) for innovation

and efforts.



COMMENT CARD

Urban Greening Grant Program Draft Guidelines

To make a public comment, please complete and return this form to a Resources Agency staff member.

NAME: VIVIANA FRANCO EMAIL: viviana@fromlottospot.org

ADDRESS: 2003 E 1st St Los Angeles 90033 PHONE: _____
(Street) (City) (Zip)

REPRESENTING: FROM LOT TO SPOT

SUMMARY OF COMMENT: In order to have a successful project w/long term
community investment, authentic community engagement needs
to be prioritized in evaluation/scoring criteria. Applicants
should be required to explicitly demonstrate how they
engaged the community in designing the project.

(Use reverse, if necessary)



COMMENT CARD

Urban Greening Grant Program Draft Guidelines

To make a public comment, please complete and return this form to a Resources Agency staff member.

NAME: Soyeon Choi EMAIL: schoi@planning.lacounty.gov

ADDRESS: 320 W. Temple St. LA 90012 PHONE: 213.974-6417
(Street) (City) (Zip)

REPRESENTING: LA County Dept of Regional Planning

SUMMARY OF COMMENT: Please ensure that applicants^{would} have enough time
to obtain governing body's resolution. It usually takes for the County
at least 1.5 month to go through the process.

(Use reverse, if necessary)