



Sacramento Urban Forests Council



bay area ^{ecosystem} urban forest council

Ms. Marcia Smith
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<p>California Energy Commission</p> <p>DOCKETED</p> <p>13-CCEJA-01</p> <hr/> <p>TN 72191</p> <p>OCT. 25 2013</p>
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RE: PROPOSITION 39 PROGRAM IMPLEMENTATION DRAFT GUIDELINES

Dear Ms. Smith,

On behalf of the California Urban Forests Council and the seven Regional Councils statewide working to deliver energy conservation in California communities through urban forestry, we are writing to support your inclusion of tree plantings as an eligible energy efficiency upgrade through Proposition 39 project implementation.

According to the US Forest Service, the cooling power of California’s 200 million existing urban trees lowers our energy consumption by about 7,300 GWh each year, which is equivalent to more than seven 100 megawatt power plants. They reduce GHG emissions by about 6.3 million metric tons per year, with 1.8 million metric tons of that coming from emissions avoidance via energy conservation. The Draft Guidelines recognize this value of trees in the energy conservation and urban heat island mitigation as well as the co-benefits they provide our communities.

We are writing to recommend some additional focus on how trees can more fully integrate into Proposition 39, and the importance of practitioners in private and public sectors in achieving the most beneficial outcomes, as follows:

1. Expand tree planting opportunities beyond “deciduous trees on the south side of buildings.” Depending on the layout of a school, or its location, evergreen species and other planting locations may also achieve the desired energy-efficiency upgrade results. As an example, the Arbor Day Foundation notes that “large deciduous trees planted on the east, west, and northwest sides create soothing shade from the hot summer sun and reduce summer air conditioning costs by up to 35%.” Additionally, strategically placed evergreen species on the north side of a building can reduce heating costs by up to 10% through wind protection and insulation.
2. In addition to landscaping, trees can provide effective water-efficiency. Mature trees can play a critical role in stormwater management, groundwater recharge, flood control, and water-

related energy conservation. Though this is implied in Exhibit A under Water-Efficiency Measures, specific language included here should be amended to specify that LEA's can "plant native, drought-tolerant *trees*, plants and landscaping." This might also be expanded to include green infrastructure for capturing, filtering, and storing rainwater for non-potable uses onsite or groundwater replenishment.

3. Expand scope of non-energy benefits. We strongly support the CEC for taking a proactive position in factoring project co-benefits into competing project considerations. As California advances towards integrated strategies to achieve desired outcomes in GHG reductions, water conservation and energy efficiency, the co-benefits associated with eligible projects such as urban forestry should be considered in order to fully evaluate the effectiveness of such projects. Additional non-energy benefits that should be considered and adopted in the final Guidelines include improved outdoor air quality, GHG reductions, improved public health through increased physical activity and reduced asthma rates, as well as safer more aesthetically-pleasing learning environment, which has been proven to improve concentration and reduce stress.
4. The guidelines should specify that local governments and agencies, as well as private sector technical experts are eligible partners with LEA's in meeting energy efficiency upgrade objectives. Implementing legislation that ultimately shaped the program encouraged schools "to partner with two or more entities, including, but not limited to, other school districts, nonprofit organizations, local government agencies, ESCOs, and others." Professional experts in urban forestry and arboriculture can provide technical expertise in helping design and implement cost-effective and successful energy efficiency upgrades such as large-canopy tree plantings.

We look forward to seeing LEAs proposing tree plantings as part of their overall energy-efficiency upgrade portfolio, and appreciate the opportunity to provide comment on the Draft Guidelines.

Sincerely,



Connie Gallippi
Program Director

In collaboration with:

Bay Area Urban Forest Ecosystem Council
Central Coast Urban Forests Council
Inland Urban Forest Council
Sacramento Urban Forests Council
San Diego Regional Urban Forest Council
San Joaquin Valley Urban Forest Council
Street Tree Seminar/Los Angeles-Orange County Urban Forests Council

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