

Comments on the Urban Forestry Protocol
Submitted by: TreePeople

Thank you for the opportunity to comment on the California Climate Action Registry's Urban Forest Project Reporting Protocol (protocol).

Overall, we are very pleased that such a protocol is being developed and want to underscore the importance of greenhouse gas emission reductions from urban forests and urban forestry projects. We also support the continued refinement of this protocol and offer the following comments:

1) As structured, the protocol omits the largest benefits of trees. It currently only issues Carbon Reduction Tons (CRTs) for carbon sequestration. This is certainly an important aspect of the role urban forests can play in greenhouse gas (GHG) reduction. However, there are other critical benefits that can be captured (which have impacts on GHG emissions) if the urban forest is seen as part of the watershed, and not simply as individual trees. We strongly encourage that these additional co-benefits be included in the protocol and that associated CRTs should also be provided for these co-benefits.

The Protocol currently discusses two of these co-benefits: reducing heating and air conditioning use through the shade from trees (which reduces the emission of GHG associated with the consumption of electricity); and using biomass for fuel (which reduces GHG emissions associated with the burning of fossil fuels).

However, two other benefits exist and should be factored into CRTs in addition to the two co-benefits mentioned above:

- A functioning urban forest watershed can capture part of residents' water needs in an average year, saving money, conserving water, augmenting the water supply and reducing pollution and water-related energy.
- A functioning urban forest watershed can divert much of the "green waste" (plant trimmings) that is currently hauled to landfills (e.g., nearly 40% of L.A.'s trash flow currently goes to landfills, resulting in associated GHG from trucking the greenwaste to the landfill).

Without counting these co-benefits, the cost-effectiveness of urban forestry projects is significantly reduced and therefore there is not as great an incentive to move forward on urban forestry projects. If it is not possible to quantify these benefits into CRTs at this time, qualitative data on these co-benefits of projects should be included in the reporting format and methods to quantify these benefits should be a priority for future reporting protocols.

2) Currently, the protocol only provides opportunities to engage in projects if you are a municipality, an educational campus, or a utility. We believe the protocol should be expanded to provide the option to engage in urban forestry projects to other types of entities, including non-profit groups and corporations.

Thank you for the opportunity to comment and we look forward to working with you in the future on these important aspects of the protocol.