October 11, 2022

SUFC Principles on Implementation of IRA Funding

The undersigned organizations, united by their commitment to preserving, creating and promoting sustainable urban and community forests, write to assist the USDA Forest Service’s (Forest Service) national Urban & Community Forestry (U&CF) program as you begin to implement the $1.5 billion allocated in the Inflation Reduction Act (IRA). This bold investment represents unprecedented recognition and support for the multitude of scientifically proven social, economic, and environmental benefits provided by forests and trees across communities of all sizes. We look forward to partnering with you to ensure these critical funds are focused on work and projects that will truly make a difference in underserved and low-canopy communities thereby mitigating the effects of climate change on public health.

The undersigned organizations ask that the Forest Service consider the following themes as implementation begins.

Workforce

In order for our trees to be properly cared for, investments must be made in the workforce. Local organizations that are currently implementing tree planting and care work are in dire need of funding and staff to ramp up their efforts, we encourage you to consider these as eligible investments.

Investing in job training and certification programs will help people find work and continue to increase the return on investment for the trees in our communities. In addition to skilled labor opportunities, entry-level positions are also available to help bolster communities. As populations expand, the need for urban and community forests increases, as does the need for trained individuals to help develop and maintain healthy and resilient forests in communities of all sizes.

We should use this opportunity to cultivate the qualified workforce of the future by connecting with a younger generation so that they understand that green industry jobs lead to viable, long-term careers.
Bridging these early opportunities with higher education is needed as well. Working with educational institutions to align the degree programs they offer with the necessary skills and understanding that students need to move into these roles is another opportunity to develop this workforce pipeline. In addition to efforts to engage youth, we also encourage support for organizations and institutions providing urban forestry career opportunities to those facing barriers to employment.

**Neighborhood and Community Goals**

Projects should be goal focused and demonstrate their effects on community well-being by addressing burdens such as extreme heat, poor air and water quality, as well as inequities in human health, social dynamics and economic status.

Engaging local partners with deep connections to the community are necessary to effectively leverage these opportunities. Conservation districts, community tree planting groups, citizen associations and others are uniquely positioned to identify and aid in implementing projects to benefit the broader community and environment. Much like the opportunities for utilizing tools for centering justice in decision making and offering additional accountability, working alongside these deeply embedded groups is of equal importance.

**Access to Tools and Education**

Relevant and scientifically defensible tools that help people understand the importance of community canopy and its management are critical to urban forest stewardship. Forest Service platforms for technology transfer, such as i-Tree—and the numerous tools and programs it supports provide for both the ability to make well-informed management decisions and accountability for those actions. As we look to reduce burdens and harms in our communities through improved urban forest stewardship, these tools become more important than ever for centering justice in decision making and providing accountability for delivering benefits to communities. We ask for your consideration in expanding the development, support, and enhancement of these tools to improve long-term capacity, accessibility, outreach and user assistance.

**Resilience Across All Land Ownerships**

Urban forests and trees across the country are threatened by climate change, extreme weather, and increasing numbers of insects and disease pathogens. To protect the community investments made possible through the IRA, we urge the Forest Service to support species diversity and availability efforts. For example, efforts to develop climate-ready, urban tree nursery stock that is resilient to anticipated future conditions and the detrimental effect of extreme weather and pests and pathogens should be prioritized.
Private landscapes contain the overwhelming majority of existing urban canopy and available planting space. Accordingly, we also encourage the Forest Service to allow IRA funds to be spent on programs to implement work on these private lands.

**Administration of the Funding**

SUFC has a diverse group of members that will benefit from federal funds through the IRA and the U&CF program. With historic levels of funding available through the IRA, it will be important to ensure the fair and equitable distribution of funding through these members as well as current and new partners.

There are tried and true authorities for the funding to pass through traditional means via the Forest Service to state forestry agencies coordinating their statewide U&CF programs. Statewide U&CF programs are well connected with their communities and partners and all have updated, collaboratively developed State Forest Action Plans that help focus funding in priority areas. The Forest Service also has means to provide funding directly to local communities and NGOs, and we would expect this existing mechanism to be an efficient and effective way to administer the funding and eligible programs at these levels.

We feel it’s important for the early adopters and other recipients of this funding to have the capacity, ability, and experience in managing grants from the Forest Service to begin implementing priority projects. However, we also encourage the Forest Service to consider the use of regrants as a way to partner with nonprofits that have not previously been in the U&CF space because of a lack of eligibility or resources.

SUFC appreciates and supports the efforts of the current administration with regard to equitable access to trees and greenspaces and reaching underserved areas in our communities. Many long-standing and newer SUFC members stand at the ready to help facilitate funding pass through and project implementation as part of IRA. The IRA will focus funding in these areas and bring about equitable change and higher quality of life for residents in communities of all sizes.

Thank you for your consideration of these critical themes related to IRA funding. As implementation progresses, we stand ready to assist with both shovel-ready projects and sustainable long-term strategies for the future.

Respectfully,
The Sustainable Urban Forest Coalition

Alliance for Community Trees
American Forests
American Planning Association
Arbor Day Foundation
American Society of Consulting Arborists
Center for Invasive Species
City Forest Credits
Green Infrastructure Center
International Society of Arboriculture
National Association of Clean Water Agencies
National Association of Conservation Districts
National Association of Landscape Professionals
National Association of State Foresters
National Recreation and Park Association
Society of American Foresters
Society of Municipal Arborists
Student Conservation Association
Sustainable Forestry Initiative
The Davey Tree Expert Company
The Morton Arboretum
The Nature Conservancy
Tree-Plenish
Trust for Public Land
Urban Wood Network
Utility Arborist Association
Wildlife Habitat Council