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May 25, 2021

Steve Frisch, President

Sierra Business Council

P.O. Box 2428

Truckee, CA 96160

(Sent by email)

RE: Greenhouse Gas Reduction Plan Implementation for Calaveras County

Dear Sir:

I am writing to you on behalf of the Calaveras Planning Coalition (CPC) regarding implementation of Calaveras County's Greenhouse Gas (GHG) Reduction Plan.

The CPC is a group of community organizations and individuals who want to create a healthy and sustainable future for Calaveras County. We believe that public participation is critical to a successful planning process. United behind eleven land use and development principles, we seek to balance the conservation of local agricultural, natural and historic resources, with the provision of jobs, housing, safety, and services.

We at the CPC want to offer you some implementation strategies that avoid past mistakes and maximize chances of future success. Past mistakes that we discourage repeating include—1) leaving the initiation of funding and policy decisions mainly in the hands of a divided Board of Supervisors and 2) delegating implementation responsibilities to the understaffed and underfunded County Planning Department. This has not worked well for the public because both the Board of Supervisors and the Planning Department are focused mainly on other priorities. To correct this, we hope you will empower willing individuals and community groups to secure information, funding, and expertise to implement GHG emission reduction and improved carbon

sequestration. (See specifics below.) We hope that the SBC will consider taking on suitable implementation responsibilities to the extent that you can secure the resources. If none of the above suggestions are suitable, please consider the formation of one or more special districts to implement the GHG Reduction Plan.

Below we explain in more detail our reasons for these suggestions.

I. Some of Calaveras County's past implementation failures have common characteristics.

Over the last 15 years, the CPC has witnessed a number of Calaveras County's implementation failures. For example, over that time period there has been an extensive failure to implement the 2010 Housing Element and the 2015 Housing Element due to "lack of available staff and financial resources (see: 2015 Housing Element, pp. 121–135 and 2019 Housing Element, pp. 116-128)." There were also the failure to complete an oak woodland ordinance and the failure to complete a dark night sky ordinance.

These failures have some common characteristics. First, in each case implementation was delegated to the already overworked and understaffed Planning Department, which has no dedicated long-range planning staff and is dominated by project-review staff. Second, the additional responsibility for implementation was not accompanied by additional staff and funding to carry it out. Third, final approval of the implementation was at the discretion of the Planning Commission and the Board of Supervisors, each of which has a myriad of other goals and responsibilities. Given these circumstances, it is not surprising that the Planning Department staff placed implementation tasks below project approval work. It is not surprising that members of the Planning Commission and Board of Supervisors were happy to focus efforts on private project approvals rather than plan implementation for the public interest.

When you prepare the GHG Reduction Plan, please avoid the three characteristics that have doomed implementation efforts in the past. Do not simply delegate implementation to the Planning Department. Please do not assign implementation to an understaffed and unfunded entity with other priorities. Please do not leave GHG Reduction Plan implementation up to the whim of public officials with other priorities.

II. Implementation successes in Calaveras County also have some common characteristics.

Over that same 15 years, the CPC has witnessed various agencies in Calaveras County make plans, secure local state, and federal funding, and build public works projects.

For example, since 2006, the Calaveras County Water District (CCWD) prepared, completed and updated an Integrated Regional Water Management Plan in collaboration with the Amador Water Agency, Calaveras Public Utility District, and the East Bay Municipal Utility District. From 2008-2018 CCWD completed approximately \$20 million in water projects and programs using approximately \$13 million in state funding and \$7 million in local matching funds.

Similarly, the Calaveras Council of Governments has adopted and updated its Regional Transportation Plan. The 2017 RTP anticipates that COG will secure about \$15 million dollars in state and federal funding each year with more modest local matching funds. This money is spent on transportation projects and programs.

These implementation successes have some characteristics in common. First, the task was delegated to a single-focus agency. Second, that agency created and updated its plans regularly. Third, that agency was not shy about securing state and federal funds to implement its plans. Fourth, that agency was not shy about hiring staff to implement its plans. Fifth, that agency measured its success by its ability to complete projects and run programs to implement the plan.

We are not saying that the CPC supports every road and every water project these agencies completed. What we are saying is that these agencies have been successful in implementing their plans. It makes sense to emulate their past success rather than county government's past failures.

III. Please consider employing one or more of the following implementation approaches to the GHG Reduction Plan.

Since we have local examples of implementation successes, please consider emulating those successes in designing implementation of the GHG Reduction Plan and avoiding the approaches that failed.

A. Avoid delegating GHG Plan Implementation to the Planning Department.

This does not work. Please do not do it. The Planning Department is already responsible for implementing over 100 measures under the 2019 General Plan. In our county, the vast majority of these measures have not been given a priority, a due date, funding, or additional staffing. Most of the implementation has simply been deferred indefinitely. Adding additional GHG Plan implementation responsibilities will make all the implementation efforts that much less likely to succeed.

B. Avoid requiring approval from the Board of Supervisors' to secure state and federal funding for implementation.

Influential local advocates oppose the use of state and federal funding by the Board of Supervisors because they see that funding as a way to manipulate local government and fund activities of which they do not approve. Do not let these advocates scuttle the GHG Reduction Plan.

C. Do not require Board of Supervisor approval of programs and measures.

Sometimes members of the Board of Supervisors both misconstrue public benefits and fuel conflict over them. For example, economic development, conservation, and preservation of open space are often cast in ideological terms that make these pressing issues a competition between

conservative and progressive approaches. Some Supervisors do not see nor desire the unifying force that a GHG Reduction Plan can play in joining conservation, economic development, family values, and other personal and societal objectives. Prevent those members of the Board from scuttling the GHG Reduction Plan.

D) Delegate GHG Plan Implementation to maximize the likelihood of success.

1) Include multiple actions that can be implemented by individuals.

Calaveras County is divided over climate change and the role that local government should play in reducing GHG emissions. Because some people will do little or nothing to reduce GHG emissions, those who are willing to address the problem will have to do more than their fair share. The GHG Reduction Plan should empower this army of the willing to reduce emissions in their homes and at their businesses. Find ways to link them with the technical information, the expert assistance, and the funding to reduce GHG emissions and to improve carbon sequestration.

2) Include multiple actions that can be implemented by non-profit organizations.

There are many community organizations that can contribute to GHG emission reduction and improved carbon sequestration. Include in the GHG Reduction Plan many actions that they can take in furtherance of their mission to reduce GHG emissions or improve carbon sequestration.

3) Consider delegating implementation to the SBC.

In at least one other County with an SBC-drafted GHG Reduction Plan, the County had the good sense to delegate implementation of the plan to the SBC. This ensures that an organization dedicated to the cause is in charge of implementing the plan. Consider offering to implement portions of the GHG Reduction Plan that are best suited to the SBC's abilities.

4) Consider delegating implementation to a GHG Reduction District.

If the County is reluctant to use the aforementioned options, at least delegate implementation to one or more single-purpose districts (e.g. Special District, Community Service District, Community Facility District, Open Space District, etc.) They would have the focus to get the job done.

V. Conclusion

We look forward to reviewing your draft plan and seeing the quality work you are doing on behalf of Calaveras County.

Sincerely,

A handwritten signature in dark ink, reading "Thomas P. Infusino". The signature is written in a cursive style with a large, stylized 'T' and 'I'.

Tom Infusino, Facilitator
Calaveras Planning Coalition

Cc. COG, BOS, Planning Department