

To: The Calaveras County Planning Commission

From: Muriel Zeller, Valley Springs, CA

Regarding: Proposed Implementation Measures for the Greenhouse Gas (GHG) Reduction Plan

Date: 4/25/22

Via email

Honorable Commissioners,

I am writing in regard to the Greenhouse Gas Emissions Inventory and Reduction Plan scheduled to be discussed at your April 28 meeting. It is a very ambitious draft plan, and the consultants suggest designating a department to implement the plan, hiring additional staff, and applying for a plethora of grants.

I recommend the county's first new staff person be a grant writer. As my supervisor recently told me in an email regarding the county's lack of a grant writer, "We are continuing to recruit, in the meantime I can say we are missing out on some opportunities." It seems safe to say that the GHG Reduction Plan will require a substantial amount of money, and while grants are a great source of funds, they cannot be accessed unless one applies.

As you know, the Conservation and Open Space Element of the county's General Plan (COS 5-C) provides for the development of "a GHG reduction plan outlining the strategies, goals, and actions for contributing to the overall reduction in greenhouse gas (GHG) emissions consistent with AB 32 and SB 32 by the end of 2022." Given the county is being sued by the Calaveras Planning Coalition for, among other things, its inability to meet the minimum requirements of state planning law in the updated General Plan adopted in November 2019, it will be fascinating to see how the county will achieve consistency with AB32 and SB32.

There are definitely proposed implementation measures in the draft GHG reduction plan that would be better suited to an urban environment, for example, the consultants' suggestion to provide a transportation subsidy to low-income households so poor people who have a job can buy a bicycle to ride to work. According to the U.S. Census Bureau, the mean commute one-way in Calaveras County is about 35.5 miles. That's quite a bike ride, particularly over steep terrain. In addition, the proposed micro-mobility programs that utilize e-scooters and bikes also use conventional exhaust spewing vans or trucks to collect, recharge, and redistribute the e-scooters and bikes, which kind of defeats the purpose of the electric scooters and bikes.

There are a number of implementation measures regarding agriculture, but the preservation of natural and working lands with conservation easements as a strategy for reducing GHG was not among them. This seems odd given the amount of natural and working lands in the county and

given California's Climate Change Scoping Plan says natural and working lands "hold **the ultimate solution to addressing climate change and its impacts**. In order to stabilize the climate, natural and working lands must play a key role." In addition, "Transportation and land use planning should minimize the footprint of the built environment, while **supporting and investing in efforts to restore, conserve and strengthen natural and working lands.**"

There were, however, four implementation measures (AG 3.1—AG 3.4) to reduce methane emissions from livestock enteric fermentation. According to Characterizing California-Specific Cattle Feed Rations and Improve Modeling of Enteric Fermentation for California's Greenhouse Gas Inventory (2018), "Enteric emissions comprise the largest known source of CH₄ [methane] in California, approximately 30% of inventoried CH₄. In 2012, 96% of total enteric CH₄ in California was generated from cattle, 73% of which was from dairy cattle (CARB, 2017)." Both dairies and feedlots produce more methane than range cattle, because of what and how much they are fed, in the case of dairies to encourage milk production and in the case of feedlots to promote weight gain. Calaveras County is not home to dairies or feedlots. I'm not suggesting the measures regarding enteric fermentation be removed, but they will have less of an impact in reducing GHG emissions than protecting working lands in perpetuity would have.

The California Air Resources Board (CARB) produced the Compliance Offsets Protocol Task Force Initial Draft Recommendations (October 7, 2020) in which one of the strategies discussed to reduce GHG emissions from the agricultural sector is avoiding the conversion of grassland. "A conservation easement is required to ensure that the grassland is not converted to cropland over the permanence of a project. Easements can cost between \$70,000 to \$150,000 and take between 9 and 18 months to implement. Land trusts and government grants can often defray the costs of the easement and the landowner receives a one-time tax deduction. However, government grant programs are routinely oversubscribed with multi-year waiting lists." Nevertheless, the task force notes, "The Reserve [Climate Action Reserve] and ACR [American Carbon Registry] have each developed a protocol that quantifies emission reductions from the avoided conversion of grasslands."

The Environmental Defense Fund has created "A new type of carbon credit program designed for long-term conservation initiatives such as conservation easements on grasslands... This program will pay landowners who are avoiding crop cultivation activities in concert with easement activity." According to the USDA California Climate Hub fact sheet (2020), "It is estimated that over 25 million metric tons of CO₂ can be sequestered annually on natural and working lands in California by 2045. For reference, 1 million metric tons is equivalent to removing over 215,000 cars from the road each year."

In addition, "A study from the University of California, Davis, found that grasslands and rangelands are more resilient carbon sinks than forests in 21st century California... Unlike forests, grasslands sequester most of their carbon underground, while forests store it mostly in woody biomass and leaves. When wildfires cause trees to go up in flames, the burned carbon they formerly stored is released back to the atmosphere. When fire burns grasslands, however, the carbon fixed underground tends to stay in the roots and soil, making them more adaptive to

climate change... The study does not suggest that grasslands should replace forests on the landscape or diminish the many other benefits of trees. Rather, it indicates that, from a cap-and-trade, carbon-offset perspective, conserving grasslands and promoting rangeland practices that promote reliable rates of carbon sequestration could help more readily meet the state's emission-reduction goals ("In Wildfire-Prone California, Grasslands a Less Vulnerable Carbon Offset Than Forests" by Kat Kerlin, July 9, 2018)."

The California Conservation Easement Database map shows close to 20,000 acres in Calaveras County as permanently protected, but the actual amount is higher. This protected open space must not be ignored in the Greenhouse Gas Emissions Reduction Plan, and the placement of additional conservation easements on rangeland cannot be ignored as a strategy for the reduction of greenhouse gases. Rangeland "should be protected from conversion pressures and degradation that could result in significant carbon emissions. In addition, restoration and improved management practices to increase carbon storage should be incentivized. This is true particularly where such enhancement, protection, and conservation action provide other important climate benefits, such as improving watershed conditions and food protection, and providing habitat and connectivity for climate stressed species (California's Climate Change Scoping Plan, page 74)."

The California Strategic Growth Council's (SGC) Sustainable Agricultural Lands Conservation program "is a component of SGC's Affordable Housing and Sustainable Communities Program (AHSC). SALC complements investments made in urban areas with the purchase of agricultural conservation easements, development of agricultural land strategy plans, and other mechanisms that result in **GHG reductions and a more resilient agricultural sector.**" For example, Mariposa County received \$245,649 to create an agricultural plan to document key agricultural areas, critical habitats and riparian corridors and guide future updates to the County's General Plan, and in Butte County the SALC strategy was used to conserve agricultural lands while achieving four key objectives: carbon sequestration, GHG emissions reductions, water conservation, and groundwater recharge.

There were comments made during a recent board of supervisors meeting that implied the General Plan requires 1:1 mitigation for the conversion of oak woodlands and resource production land. Sadly, "COS-4D Oak Woodlands" and "RP-1F Mitigation of Impacts from Resource Production Land Conversions" call to "develop" and "establish," respectively, 1:1 mitigation for the conversion of oak woodlands and resource production land at some undesignated point in the future. In other words, the "mitigation measures" and "mitigation program guidelines" do not yet exist, so the county could not claim them as a means to offset carbon emissions with oak woodland or resource production open space carbon sinks. However, an SALC planning grant would allow the county to fully realize the intent of COS-4D and RP-1F and finally develop an open space preservation plan and maybe even include an open space map in the General Plan.

Please consider the important role that natural and working lands play in the reduction of GHG emissions, and please consider applying for an SALC Planning grant. The timeline is below:

FY 2021-22 (Round 8) SALC Dates and Deadlines (subject to change):

Draft Guidelines available for public comment: February 22, 2022

Public comment workshops: February/March 2022

Public comment closes: March 25, 2022

Guidelines approved/released: April SGC meeting

Acquisition pre-proposals due: June 1, 2022

Planning pre-proposals due: July 1, 2022

All applications due: September 2, 2022

Sincerely,

Muriel Zeller

cc:

Tom Infusino, Calaveras Planning Coalition Facilitator

Austen Thibault, Community Action Project Outreach Coordinator

Community Action Project Governing Committee

Colleen Platt, Secretary, MyValleySprings.com

Chris Wright, Policy Director, Mother Lode Land Trust

Gabriel Elliot, Calaveras County Director of Planning