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5/11/22

Calaveras County Planning Commission
C/o Calaveras County Planning Department
891 Mountain Ranch Road
San Andreas, CA 95249

(transmitted by email)

RE: Continued discussion of proposed greenhouse gas (GHG) emission reduction strategies

Dear Commissioners:

Thank you for the opportunity to comment again on the proposed GHG emission reduction strategies. My name is Tom Infusino, and I am making these comments on behalf of the Calaveras Planning Coalition (CPC).

The CPC is a group of community organizations and individuals who want 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 need to provide jobs, housing, safety, and services.

A number of concerns were expressed during your last meeting. I am writing you to try to address some of those concerns.

I. The County can condition implementation of any measure on the receipt of outside funding.

Commissioners expressed concern about committing the County to implement GHG emission reduction measures prior to the receipt of grant funds to implement those measures. For those

measures that the County would like to implement with State, Federal, and/or private foundation grants, the GHG emission reduction plan could explicitly state that implementation of the measure is contingent on the County first receiving outside funding to implement the program. The plan could also acknowledge that the amount of emission reduction will depend on the degree to which implementation is fully funded. A commitment by the County to regularly apply for grant funding is needed so there is some substantial evidence in the record to support the initial emission reductions claimed under the plan.

II. The GHG Emission Reduction Plan is needed to complete the 2019 General Plan Update (GPU) implementation measures.

A) Five of the 2019 GPU Implementation Measures associated with GHG emission reduction are dormant until activated by the Board of Supervisors.

One Commissioner asked why the 2019 GPU Implementation Measures to reduce GHG emissions were not sufficient to serve as a GHG emissions reduction plan. Unfortunately the implementation measures in the 2019 GPU fall short of qualifying as a GHG reduction plan.

You see, there are different types of implementation measures in the 2019 GPU. Many of the implementation the measures are completed by project applicants, their consultants, and County Planning Staff after receipt of a project application. (See Attachment 1: List of measures implemented during project application and review -email to Maurer, 12/12/19) Those measures are being implemented now as part of project review.

However, 90 of the GPU implementation measures are “one-time” task that must wait to be made a priority for implementation by the Board of Supervisors. One way this happens is at the Supervisors’ annual implementation priority-setting meetings. (See Attachment 2: GPU Implementation Measures Table.) These meetings have been held near the beginning of each year since adoption of the 2019 GPU. So far, the County has prioritized and completed the Zoning Map Update, the traffic study manual update, the GHG Inventory, and the Valley Springs Community Plan. Other priority items include an update of the Zoning Ordinance to implement 27 of the General Plan’s Implementation Measures. (See Attachment 2: GPU Implementation Measures Table, blue highlighted measures.). However, the majority of the implementation measures have not yet been prioritized by the Board. There is no implementation timeframe specified for these implementation measures.

As depicted in the table below, some of the GHG reduction measures are an outgrowth of fifteen of the 2019 General Plan Update’s implementation measures. Five of these are the type of “one time” measures that must be prioritized by the Board for implementation. (CS-5A, COS-5E, PF-3A, PF-3B, and PF-2H.) By approving these GHG reduction measures in the GHG reduction plan to achieve reductions by 2030, the Board would be giving these five 2019 GPU implementation measures the implementation timeframe they currently lack. In some cases, by identifying a specific implementation program, the GHG emission reduction measure does provide the clarity the 2019 GPU implementation measure lacks. By including an expected emission reduction for each measure, the GHG reduction plan will give the 2019 GPU implementation measures the quantified objectives they currently lack.

GHG Emission Reduction Measure**2019 GPU Implementation Measure**

RE-1: Increase Community Renewable Energy &

COS-5E Alternative Energy &

RE-4: Promote On-Site Renewable Energy

PF-3A Alternative Energy &

PF-3F Alt. Energy Incentives

TR-1.2, TR-1.3, 1.4, 1.5

PF-3B Alt. Fuel Vehicle Infrastructure
& Incentives

TR-3.2, TR-3.3, TR-3.4, TR-3.5, TR-3.6

C-3A Rideshare Program

TR-4.1, TR-4.3, TR-4.4, TR-4.5, TR-4.6

C-5A Implement Bike & Pedestrian Plan

TR-4.7, TR-4.8

COS-7I Trail Funding

COS-7E Trail System

COS-7N Bike & Pedestrian Facilities

SW-1: Implement Waste Diversion Program

COS-5D Green Waste Collection

WW-2 Use Reclaimed Water &

PF-2H Water Conservation

WW-3: Use Grey Water

PF-2I Recycled Water

AG-1.6, AG 1.7, AG-1.8

RP-2D Best Management Practices
Education and Funding

WF-1.1 Defensible Space

S-3S Fuel Management - New Development

WF-3.6 Prescribed Burning

COS-2B Prescribed Burning

By securing both the funding and staffing and then running the programs in the plan, the County would actually be implementing both the provisions in the GHG reduction plan and the 2019 General Plan Update.

B) The County chose the current process instead of empowering the provisions of the 2019 GPU to serve as a GHG emission reduction plan.

It is true that the County could have included an implementation timeframe for the implementation measures in the 2019 GPU that reduce GHG emissions. It could have calculated the emissions reduction anticipated from each measure at that time. It could have begun implementation immediately upon approval of the 2019 GPU. This approach was taken in San Joaquin County. (See Attachment 3 - San Joaquin 2014 Draft General Plan Sustainability Policies.) However, that is not what Calaveras County chose to do. Instead the County chose a general plan that calls for the process currently underway to estimate the GHG emission reduction target and to adopt measures to achieve that target.

III. Some GHG reduction measures could be made a better fit for Calaveras County.

Some Commissioners and commenters observed that some of the proposed GHG reduction measures were not a good fit for Calaveras County. Before simply removing these measures from the plan, we at the CPC encourage you to try to find a way to make the measure a better fit for Calaveras County. Also, please allow the public to make suggestions to improve the fit of the measures during the upcoming public comment period.

IV. Who is going to do this work?

As noted in our letter to COG and your consultants last year, there are options for implementing a GHG emission reduction plan. (See Attachment 4: GHG Plan Implementation letter May 2021.) As Gina pointed out at your last meeting, the Board of Supervisors will have to decide which approach it wants to take.

V. Where will the money come from to do this work?

As noted by your consultant, tens of billions of dollars are being allocated at the State level for GHG emission reduction programs. While some of this money is being distributed directly to local individuals and organizations, most of the locally spent program funds will be distributed through participating local governments. Also available are Federal and private foundation grants. The table of proposed GHG emission reduction measures lists the specific program to fund each of 12 proposed measures. (See EB-3, TR-1.6, TR-1.10, TR-2.3, TR-3.3, AG-1.5, AG 1.8, AG-2.4, AG-2.5, WF-1.4, WF-1.8, and WF-2.3.) Perhaps during the public review period we will have the opportunity to identify funding sources for the remaining emission reduction measures.

VI. The market deals inefficiently with GHG emissions and with the transition to cleaner alternatives.

Market theory tells us that in the presence of certain conditions, the marketplace will function to efficiently allocate resources. One condition is that there are clear and enforceable property rights. A second condition is that there is some means of exchange for the transfer of these property rights (e.g. cash, credit cards, etc.). Thus, in an efficient market transaction the purchaser gets all the benefits of its bargain, the producer receives the entire price, and all the production costs are borne by the producer. A third condition is that transaction costs are near

zero. (If you had to hire an expensive lawyer to negotiate the purchase of a candy bar, then the transaction costs would trump the price of the goods.) A fourth condition is that the costs of entry into production are not too high. If the costs of entry are high, then the initial producer exercises monopolistic power that results in the inefficient allocation of resources.

Unfortunately, the conditions for efficient allocation of resources are often not present in the real world. This results in a failure of the market to efficiently allocate resources. One such market failure exists when some of the costs of production are not borne by the producer, but are instead external to the market transaction. Pollution is a classic externality. It is a cost of production not borne by the producer, but foisted on society instead. It is not reflected in the price of the good sold. Thus, at market equilibrium (when supply equals demand) more than an efficient amount of the good is purchased. GHG emissions are an example of an externality that the market place does not efficiently address. They are a cost of production outside the market transaction that is foisted on society.

American governments generally have three approaches to address such market flaws. One is to regulate the polluter. Another is taxation of the pollution sufficiently to inspire the polluter to reduce the emissions. A third method is to subsidize people to reduce their pollution. In California, we have a cap and trade program that uses a combination of regulation and market forces to more efficiently reduce GHG emissions. Polluters who would have to pay far too much to reduce their own GHG emissions purchase emission credits from others who can more cheaply reduce their GHG emissions.

Unfortunately, when it comes to GHG emissions the market flaws do not stop there. For decades the Federal government has been pumping billions of dollars of subsidies into the fossil fuel industry that is a major producer of GHG emissions. Thus, the price people see in the marketplace for these fuels is much lower than it would be without those subsidies. Thus fewer consumers switch to other fuels. The market is not giving consumers the right signals to promote more efficient resource use. These Federal subsidies are beyond the power of Calaveras County and the State of California to change. Thus, the State of California is attempting to use a combination of taxes, regulations and incentives to reduce GHG emissions. Calaveras County is seeking to participate in that effort to reduce GHG emissions.

VII. The County should be doing this.

During your last meeting a question frequently arose about whether or not the County should be doing this.

One reason the County should be doing this is to avoid more egregious State regulations in the future. Given that securing citizens' life, liberty, and property is among the basic constitutional obligations American of government, and that Climate change is a grave threat to each of these interests, it is no surprise that the State of California wants to achieve GHG emission reductions. While some of these reductions are done through State action, the State also respects local governments enough to give them the opportunity to select the additional measures that they feel would be best to achieve local reduction targets. To the degree that metropolitan areas do not pull their own weight in reducing GHG emissions, more state efforts are likely. Such State

efforts tend to be more blunt “one-size fits all” measures that lack the nuances of local plans designed to address local conditions. So, one reason the County should attend to GHG emissions is to avoid more egregious State regulations in the future.

A second reason is to secure the benefit of CEQA streamlining for discretionary projects proposed in Calaveras County.

A third reason is that many of the measures have independent utility, such that they are worth doing regardless of the GHG reduction implications. Reducing the risk of wildfire ignition in the wildland-urban interface will not only reduce GHG emissions, it will make our families and our property safer. Implementing our Safe Routes to School plan will keep our children safer. Making our businesses more energy efficient will reduce their costs and make them more profitable. Improving the fertility of the soil on our farmlands and rangelands can help agricultural operations to survive in very competitive marketplaces. Having electric vehicle charging stations at tourist-serving locations will help our tourism industry to stay competitive. Diversifying our energy supply with local renewable sources could provide our homes and businesses with more reliable power in the face of public safety power shutoffs. Because of these major benefits, we should be implementing these strategies even if they provided no GHG emission reductions, and even if we did not care about global climate change.

A fourth reason is that a properly constructed plan can better qualify the County for State and Federal funds that we can apply to projects that will benefit us in ways beyond GHG emission reduction. Securing such funds will help the County get back some of the capital that is drained from the area in taxes each year, and to invest it back in our communities. This makes work for local carpenters, plumbers, electricians, forest workers, ranch hands, pavers and others. It also makes revenue for all the businesses that supply them with tools, materials, and food.

In conclusion, to secure our constitutional liberties that are threatened by climate change, to fend off more egregious state regulations, to qualify for CEQA streamlining, to reap the many secondary benefits of GHG emission reduction measures, and to pump needed funds back into our local economy, the County most certainly should be adopting a GHG emission reduction plan.

VIII. Disseminating information is a key function to help the market work.

Some Commissioners questioned the usefulness of County efforts to disseminate information about available incentives for GHG reduction.

As pointed out by one of the consultants, promoting an incentive program is one piece of the substantial evidence that the program will reap emission reductions in Calaveras County. Thus, promotional efforts do have that practical role to play in a GHG reduction plan.

Also, market theory tells us that one of the four precursors to the efficient distribution of resources by the marketplace is perfect information. The consumer needs to know what competing goods are available at what prices to make the efficient choice. Because advertising is often expensive and sometimes misleading, consumers rarely have perfect information in the real world.

When it comes to embracing goods that reduce GHG emissions, the County has a unique opportunity to influence consumers with accurate information, and there are several inexpensive options for doing so.

People coming to the various service counters at the County sometimes wait to be served, and some of these service counters already take advantage of this opportunity to distribute public information pamphlets in Kiosks and on bulletin boards. GHG emission reduction deals could easily be advertised at these locations as well.

The County also has a very busy website that is used to distribute useful public information.

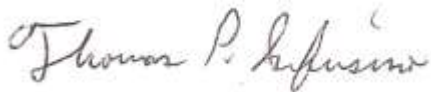
The County has contact information for organizations and businesses that also can help to spread the word about GHG reduction deals for consumers.

The County has lists of homeowners who may qualify for some GHG emission reduction programs, and who would welcome the information.

I am not familiar with the County's presence on social media, but that would also be a useful way to distribute promotional information to consumers on GHG reduction opportunities.

In conclusion, providing accurate information to consumers is an important government function to facilitate the use of the marketplace to secure GHG emission reductions.

Sincerely,

A handwritten signature in dark ink, reading "Thomas P. Infusino". The signature is written in a cursive, flowing style.

Thomas P. Infusino, Facilitator

Calaveras Planning Coalition