

5/6/22 Email to the Planning Commission by Muriel Zeller on GHG emission reduction strategies.

Hello, Commissioners.

After watching a significant portion of your April 28 meeting on proposed measures for the county's GHG Reduction Plan, I have a few comments and observations.

Consultant Meredith Anderson wrote in an email to me, "The measures in the draft list are options provided to the County based on ideas of what other jurisdictions have considered, and will not necessarily be included in the plan itself. The purpose of this current process is to remove or add appropriate measures for Calaveras County." I thought the county hired the **Sierra Business Council**, because the consultants would be able to recommend which measures would be most appropriate for a **Sierra** county. The consultants have thrown the spaghetti on the wall, but it's up to the Planning Commission to decide what sticks.

If the Planning Commission is interested in seeing what has worked in other jurisdictions in the state, "The California Climate Action Portal Map (CAP-Map) is an open data tool developed by the California Air Resources Board to recognize local government climate action planning efforts across the state and to aggregate creative planning ideas for tackling climate change. Users can quickly access the climate action planning details of local jurisdictions including links to climate plans created, greenhouse gas (GHG) inventory information, GHG reduction targets, the local strategies planned to meet these targets, and more. The CAP-Map consists of both an interactive web map and a GHG reduction strategy search tool: <https://coolcalifornia.arb.ca.gov/capmap2>." Frequently asked questions about the portal are attached. Unfortunately, aside from Tuolumne County, there are no GHG reduction plans in Sierra counties. So when the consultants talk about "other jurisdictions," for the most part they are not talking about counties like Calaveras. However, this is an opportunity for Calaveras County to be a leader in the Sierra Nevada region. (Forgive me if you have already been provided with this information by the consultants or staff.)

There was a great deal of talk about the cost of implementing a GHG reduction plan and the staff time that would be involved. The position of the consultants and the planning director seemed to be that having a GHG reduction plan would "position" the county to apply for grant funding to implement the plan. Even though there are, literally, millions of dollars available to the county to implement a GHG reduction plan, I have little faith that the county will apply for such funds, because most state grants are incentives to get you to do what the state wants you to do, which can be unpopular locally. If we don't apply for grants our local taxes (in the form of grants) go to other jurisdictions, and we are often forced to comply with a state mandate anyway, but without any money. The county's reluctance to apply for grant funding other than the basics like CDBG doesn't really make sense.

I recently emailed my supervisor about the county's lack of a grant writer. He replied, "As to the grant writer position, we have it on the books and we have been actively recruiting. In these COVID times recruiting has been especially trying. We are continuing to recruit, in the meantime I can say we are missing out on some opportunities." As a former grant writer who worked as an independent contractor, I can say that my supervisor's response is misleading. The amount of money being offered by the county (a range of about \$40 to \$60 per hour) is insufficient. Alternately, grant writers can be hired as independent contractors, i.e., consultants. In addition, existing county staff can apply for grants. Virtually all state and federal grants have a graduated process that begins with introductory information sessions that walk applicants through the process. In addition, the Sierra Nevada Conservancy offers grant writing

workshops and access to the California Grants Portal, which lists all grants and loans offered by state agencies: <https://sierranevada.ca.gov/funding/>. **The government wants to give us the money,** but you have to cultivate relationships and get ahead of the process.

County counsel seemed particularly interested in the completion of a GHG reduction plan that would facilitate CEQA streamlining and allow developers to tier off the county's plan. However, as one of the consultants observed, a CEQA qualified GHG reduction plan must provide "substantial evidence" regarding the ability of the plan to actually reduce GHG emissions from the 2018 baseline, which, apparently, the consultants were trying to convey in their note which read, "All measures can be implemented as mandates, incentives, or voluntary (incentives or voluntary programs, however, cannot be considered as guaranteed GHG reductions)," because it would be difficult to impossible to quantify incentive-driven and voluntary efforts, hence, a lack of substantial evidence.

The consultants counseled that a mandatory measure must include an "action verb," which is redundant, but no matter. I would agree, but I would add that the county needs to be the subject to the action inherent in the predicate. For example, "Pursue Community Choice Aggregation with a renewable energy goal (RE-2)" should read "The county will pursue..." Also, in order to be of any use in regard to CEQA, the GHG reduction plan must actually be implemented, which will be challenging because of the need for dedicated staff and money. The county could simply decide not to adopt a GHG reduction plan, but development projects would be vulnerable to litigation for failure to sufficiently reduce GHG emissions and meet CEQA requirements.

One proposed measure (TR 1.1) is to implement the Central Sierra Zero Emission Vehicle Readiness Plan (attached), which covers Alpine County, Amador County, Calaveras County, and Tuolumne County. Amber Collins of the Calaveras COG was a member of the working group that developed the readiness plan. Even though at least one commissioner admitted to not knowing what the CSZEV Readiness Plan is, it would go a long way in helping to implement the proposed measures to reduce GHG emissions related to transportation. In addition, commissioners may not want to dismiss Community Choice Aggregation out of hand without first learning more about it: <https://cal-cca.org/cca-impact/>. There are successful CCA programs in both Placer and El Dorado Counties, and it is being considered in Tuolumne and Nevada Counties, so it is not unheard of in the Sierra region.

I have not seen the consultants' contractual scope of work, but their scope of work seems to, literally, limit the scope of their recommended plan measures. In her email to me, Ms. Anderson also wrote, "Regarding carbon sequestration, **the County intends on including carbon sequestration to their measures consideration**, but it is outside of the scope of this current project that the consultants have been hired to work on. As such, until directed by the County **the consultant team will not be able to provide in-depth work on carbon sequestration opportunities** (emphasis mine)." While I was gratified to hear the county intends to consider carbon sequestration as a reduction measure, I was forced to wonder why it is not in the current proposed GHG reduction plan. In essence, why is the commission considering an incomplete proposal?

As you may recall from my comment letter dated 4/25/22 (attached), I support the preservation of natural and working lands with conservation easements as a means to sequester carbon and provide a host of other ecosystem services, but also because the California Government Code 65562(a) states that the policies of the Conservation and Open Space element of the General Plan must provide that open space "be conserved wherever possible."

I wish you all the best in the difficult task you have before you.

Regards,
Muriel Zeller