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Planning Commission
County of Calaveras
891 Mountain Ranch Road
San Andreas, CA 95249
(Sent by email.)

November 29, 2022

RE: Greenhouse Gas (GHG) Reduction Measures

Dear Commissioners,

Thank you for the work you have been doing on the GHG reduction measures. CPC members reviewed the agenda packet for your November 3, 2022 meeting and watched many parts of the meeting. The CPC has the following comments. Please consider these comments as you continue to enhance the list of GHG reduction measures to achieve your reduction target.

I. Thank you for quantifying the GHG reductions.

First, we appreciate your diligence and patience in securing from your consultants the estimated emission reductions from the draft measures (72,327 metric tons of CO₂ [MTCO₂e]), and the estimated emission reductions gap (56,229.24 MTCO₂e.) We understand that these estimates will be adjusted as some reduction measures are omitted, some modified, and others are added.

II. Please consider changing “Investigate the Feasibility of Funding” to “Apply for Funding” with regard to four of the Items for Discussion.

Second, thank you to Chair Plotnik for her notes on the Planning Commission’s discussion items. We hope that some of these items will ultimately be included in the GHG reduction plan. We note that four of these items call on the County to “Investigate the Feasibility of Obtaining

Funding.” We would like the Commission to know that each of these proposals is eligible for funding from existing state and federal programs.

- Partnering to develop additional biomass energy facilities can be funded through a number of State of California, USDA and Department of Energy grant programs. These are listed at the University of California Agriculture and Natural Resources website. (<https://ucanr.edu/sites/WoodyBiomass/Grants/> , Attachment 1.)
- Partnering for fuel reduction projects can be funded through CAL FIRE’s Wildfire Prevention Grants Program. As of May 31, 2022, this program has spent \$219 million implementing 306 projects. (<https://www.caclimateinvestments.ca.gov/fire-prevention-grants> , Attachment 2.)
- Evacuation planning, notification, and routes in State Responsibility Areas (a major component of the Calaveras County land base) is one of the many types of programs that can be funded through CAL FIRE’s Fire Prevention program. As of May 31, 2022 this program has spent over \$200 million implementing 111 projects. (<https://www.caclimateinvestments.ca.gov/fire-prevention> , Attachment 3.) Funds and training for maintenance of evacuation routes can be funded through CAL FIRE’s new Community Fire Planning and Preparedness grants program. (<https://www.caclimateinvestments.ca.gov/community-fire-planning> , Attachment 4.)
- Upgrading exteriors to comply with WUI requirements for low-income home owners can be funded with grants or loans through the USDA’s Section 504 Home Repair program. (<https://www.rd.usda.gov/programs-services/single-family-housing-programs/single-family-housing-repair-loans-grants/ca> , Attachment 5.) Grants are also available for such housing rehabilitation from the state’s Department of Housing and Community Development (<https://www.hcd.ca.gov/grants-and-funding/programs-active> , Attachment 6.)

Most of Calaveras County east of Highway 49 houses a “priority population”, and thus projects in these areas are given an advantage in competing for state grants funded by California Climate Investments. As a result, nearly half (48%) of the \$5.4 billion allocated thus far through California Climate Investments is for projects benefiting priority populations. (<https://www.caclimateinvestments.ca.gov/priority-populations> , Attachment 7.) These California Climate Investments projects are funded through cap-and-trade revenues that are appropriated annually by the Legislature.¹ Thus, while some programs have allocated all of their funds for the **current** fiscal year, additional funds will be appropriated for those programs in the next state budget.

Other measures on the Planning Commission’s list of discussion items that are paired with suitable funding programs begin with the phrase “Apply for Funding.” Given the availability of

¹ For a list of additional funding opportunities see the Tuolumne County Climate Action Plan, pp. 5-14 to 5-16 (Attachment 8), and the states Climate Change Funding Wizard at <https://fundingwizard.arb.ca.gov/web/> .

funding for these four proposals, please amend them to replace “Investigate the Feasibility of Obtaining Funding” to “Apply for Funding.”

III. Thank you for incorporating the General Plan Implementation Measures.

Third, we thank Commissioner Laddish for his extensive efforts in his second and third comments identifying General Plan Implementation Measures that reduce GHG emissions in ways that are locally relevant and appropriate. We thank the Commission for its support of these efforts. We hope that these suggestions will ultimately be incorporated into the GHG reduction plan.

IV. Thank you to the County staff who made very constructive suggestions.

The fourth comment of Commissioner Laddish includes notes on the many constructive suggestions from County staff from a variety of departments. We are fortunate to have people with their expertise working on this plan. Since these and other County departments may be involved in implementing many of the GHG reduction measures, at least one member of County staff should be given responsibility for coordinating these many efforts and monitoring their effectiveness. This has been done in other communities with GHG reduction plans.²

V. Additional measures, funding mechanisms, and emission reductions.

We understand that the Planning Commission is seeking additional GHG reduction measures suitable for Calaveras County to secure the additional 56,229 metric tons of emission reductions needed to meet the AB 32 target. We have reviewed GHG reduction measure being implemented in other parts of California using state and federal funds. Below is a list of additional measures and funding mechanisms.

A) Land Use Changes adopted in the 2019 General Plan Update

A prominent component of greenhouse gas reduction plans in other locations is their efforts to shift population growth toward community centers and away from rural locations distant from necessary services. This shortens vehicle trips to reduce emissions, and facilitates some trips being done through walking or other low-emission means. From the outset, such a shift was a major part of the effort that resulted in the 2019 General Plan Update. (At the time, the reason had more to do with the difficulty of providing cost-effective roads and surface water to scattered low density development.) 2010 Uplan data indicated that adoption of a land use designation map very similar to that of the 2019 General Plan Update would shift about 10% of population growth (then estimated at about 2300 people) over the next 20 years to community centers relative to the 1996 General Plan. (Calaveras County General Plan Update Alternatives Report, February 2010, pp. 12, 56.) That estimate was made prior to the drafting of policies for the text of the general plan that would reinforce and enhance the effect of the map. Of course, since then the estimated population growth has declined, so any attributable shift in population growth would need to be recalculated. The environmental impact report later confirmed that the 2019 General Plan Update would reduce GHG emissions relative to the 1996 General Plan at buildout.

² Attachment 9, Citrus Heights Greenhouse Gas Reduction Plan, p. 3-7.

Unfortunately, the report did not quantify that reduction at buildout, nor the reduction associated with any interim level of growth. (2019 General Plan Update Draft EIR, 2018, pp. 6-8 to 6-9.)

Most prominently, this shift is prompted by the dramatic reduction of development capacity in the Residential-Agriculture (5-acre minimum parcel size) land use designation. Ultimately, over 100,000 acres of this designation were removed from the land use designation map. Much of it was changed to the Resource Production designation.

In addition, some of the land use, resource production and conservation implementation measures in the 2019 General Plan will facilitate this shift toward population growth in existing community centers, and to restrict future conversion of Resource Production land to developed uses. These include:

LU-2B Mixed Use Zoning

LU-2C Infill and Rehabilitation Incentives

LU-2D Infill Database

LU-4D Historic Commercial/Historic Mixed-Use Zoning

LU-4G Parking

RP-1A County Code Amendments (setbacks)

RP-1B Findings for Approval

RP-1C Public Facilities on Resource Production Land

RP-1D & RP-1F Evaluation and Mitigation of Impacts from Conversion

COS-1A Open Space Zoning Ordinance

COS-4D Oak Woodlands

The land use implementation measures are very similar to policies in the climate action plans in other communities that aim to shift some residential development to community centers.³

If the GHG reduction plan specifies objective targets and time frames for implementing these general plan provisions, then the County may be able to take credit for the GHG emission reductions associated with these land use changes in the 2019 General Plan Update.

Even if the consultants cannot easily quantify the land-use-related emission reductions, these land use measures enhance the effectiveness of some of the transportation-related emission reduction measures. (See TR-4.3, 4.4, 4.6, 4.8, 4.9.) For example, walking and other low-emission options are more feasible for running errands to the store, post office, and church if you live above a business in the mixed-use community center instead of living many miles out of

³ Attachment 10, Fresno Greenhouse Gas Reduction Plan, 2014, pp. 42-54; Attachment 11, City of Woodland, Final 2035 Climate Action Plan, May 2017, pp. 4B-3; Attachment 12, City of Carson, Climate Action Plan, 2017, Measure LUT G-2, p. 37; Attachment 13, Citrus Heights GHG Reduction Plan, pp. 3-11 to 3-14.

town. Thus, these land-use-related measures that promote living in community centers provide additional preliminary evidence that the transportation-related emission reductions measures will be effective and that their ambitious emission reduction targets will be met. After adoption of the GHG reduction plan, monitoring and reporting will be needed to confirm the actual effectiveness of the GHG reduction measures.

B) Carbon Sequestration on Range and Forest Lands.

Carbon sequestration can be used in GHG reduction plans in rural areas with range and crop lands. For example, increasing carbon sequestration is a component of the 2022 Tuolumne County Climate Action Plan.⁴ Promoting carbon sequestration on agricultural lands is also a component of the Yolo County Climate Action Plan.⁵ Protecting working lands and increasing carbon sequestration on them are strategies in the Sonoma County Regional Climate Action Plan.⁶ Marin County's 148,000 acres of rangeland has an estimated soil carbon stock of 39.5 million MTCO₂e. Thus, a mere 1% increase in soil sequestration on this 148,000-acres of rangeland would reduce GHG emissions more than any other local GHG reduction measure in the Marin County Climate Action Plan.⁷ In 2014, Calaveras County reportedly had about 188,000 acres of rangeland and 77,000 acres of private timber preserves.⁸

Carbon sequestration can be calculated to support the sale of carbon credits in offset programs. Models used to estimate soil carbon sequestration on agricultural lands have been employed in offset programs in Australia and Canada.⁹ The University of California and its partners are quantifying carbon sequestration benefits from specific soil amendments in California to support the use of agricultural carbon sequestration in carbon offset markets.

(<https://www.ucop.edu/energy-services/carbon-offsets/uc-initiated-offsets/the-working-lands-innovation-center.html> , Attachment 17.) Farmers in the U.S. are already making money selling carbon credits. (<https://www.cnbc.com/2022/07/11/farmers-are-making-thousands-of-dollars-from-carbon-credits.html> , Attachment 18.) Ranchers in Marin County are already preparing to sell carbon credits. (<https://toolkit.climate.gov/case-studies/ranchers-marin-county-consider-carbon-credits> , Attachment 19.) Carbon credits for forest management have been available in California for over a decade. (<https://www.ncsl.org/research/environment-and-natural-resources/state-forest-carbon-incentives-and-policies.aspx> , Attachment 20.)

Money is available from California Climate Investment programs to improve the carbon sequestration of both our forests and our agricultural lands. Conservation easement funding is available through the Sustainable Agricultural Lands Conservation program. As of May 2022,

⁴ Attachment 8 - Tuolumne County Climate Action Plan, Measure 3.2 Increase soil organic material and carbon content, p. 4-34.

⁵ Attachment 14, Yolo County Climate Action Plan, Measure A-6: Sequester carbon in agricultural landscapes, pp. 38-39.

⁶ Sonoma County, Climate Action 2020 and Beyond, July 2016, pp. 3-20 to 3-21 (<https://rcpa.ca.gov/what-we-do/climate-action-2020/> .)

⁷ Attachment 15, Marin County Climate Action Plan, July 2015, p. 6-3.

⁸ Calaveras County General Plan Background Report, December 2014, pp. 30, 33.

⁹ Attachment 16, Paustian, et al., Quantifying carbon for agricultural soil management from the current status toward a global soil information system, Carbon Management, 10-6, 2019, 567-587.

that program has spent about \$84 million implementing 83 projects that reduce emissions by 8.7 million MTCO₂e. (<https://www.caclimateinvestments.ca.gov/salc> , Attachment 21.) CAL FIRE's Forest Health Program provides grants for reforestation and conservation easements. As of May 2022, the program has spent about \$393 million implementing 212 projects to reduce emissions by 15 million MTCO₂e. (<https://www.caclimateinvestments.ca.gov/forest-health> , Attachment 22.) The California Wildlife Conservation Board's Climate Adaptation and Resiliency Program has funded regenerative grazing projects working to include 70,000 acres of land across 17 properties. (<https://www.caclimateinvestments.ca.gov/2021-profiles/2021/4/26/climate-adaptation-and-resilience-program-audubon-conservation-ranching-program-tomales> , Attachment 23.) Funding is also available through the U.S. Department of Agriculture's Environmental Quality Incentives Program (EQIP) and its Conservation Stewardship Program (CSP).

Plain and simple. Calaveras County has over 250,000 acres of range and private forest lands. Those lands can be managed to better sequester carbon while continuing to produce valuable food and fiber. Their contribution to GHG reduction could dwarf other available measures. The money to do the work is available from the state and federal governments. Regardless of whether we get "credit" for it in the GHG reduction plan, if we are serious about reducing climate change, if we are serious about improving the economic viability of willing local ranches and timberlands, then we need to include in the GHG reduction plan efforts to secure the long-term conservation of range and forest land, and efforts to invest in increasing the carbon sequestration of those lands.

VI. Thank you for thinking beyond GHG emission reductions to climate change adaptation.

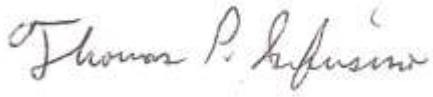
First and foremost, by completing the GHG reduction measures you are going to enable Calaveras County to do its part to stem climate change along with so many other cities, counties, states, provinces, and countries around the world. Calaveras County can truly be proud to participate at this level in a worldwide effort to reduce harm to people, crops, livestock, and wildlife from the extremes of climate change. If you had done your part for the world and stopped there, that would have been enough. But you did not stop there.

Instead, you are looking for state funding mechanisms from the cap-and-trade program to finance local GHG reduction measures. These cap-and-trade revenues are provided by industrial emitters that cannot more economically reduce their emission. This helps maintain the viability of these statewide economic engines and saves the jobs of their employees. If you had done your part for the state's economy and stopped there, that would have been more than enough. But you did not stop there.

Instead, you are seizing the opportunity to help willing local people **adapt** to the levels of climate change we are and will continue to experience for some time. Through this GHG reduction plan you may help willing local people make our homes, our properties, and forests more fire safe. You may help willing local people to get more use out of less water. You may help willing local people to generate home-made electricity. You may empower willing local

businesses to serve both tourists and locals who use electric vehicles. You may empower local plumbers, electricians, and builders to make these improvements to the places we live and work. You are making a GHG reduction plan that will improve the lives of those in Calaveras County willing to embrace the plan, without over- burdening those who choose not to embrace it. Thank you.

With Gratitude,

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

Tom Infusino, Facilitator

Calaveras Planning Coalition