

March 15, 2022

Agnes Martelet  
Environmental Compliance Manager  
City of Carmel-By-The-Sea Climate Committee,  
Email: amartelet@ci.carmel.ca.us

Dear Members of the Carmel Climate Committee,

Thank you for the opportunity to review the March 8, 2022 LSA memorandum, *Carmel-By-The-Sea Greenhouse Gas Inventory Update, Forecast, Reduction Targets, and Strategies*, and the updated inventory itself. LandWatch supports the proposed adoption of a Climate Adaptation and Action Plan, while noting that the plan is still a work-in-progress.

LandWatch also supports the proposal to create a new grant writer/climate coordinator position (Action 1.4.4 in the Climate Adaptation Plan) tasked with the implementing, coordinating, and tracking the plan. Development of this institutional competence is a critical step in reducing greenhouse gas (GHG) emissions and adapting to climate change.

As proposed, the Climate Adaptation and Action Plan may reduce GHG emissions, which LandWatch strongly supports. The Plan may also provide a foundation for an eventual plan for further GHG reduction under CEQA Guidelines Section 15183.5.

However, to meet Section 15183.5 requirements, the plan requires several additional elements:

1. The GHG reduction target must be based on a long-term goal, e.g., carbon neutrality by 2045 in line with Executive Order B-55-18, rather than only on the near-term 2030 goal. The longer-term goal is a critical part of a climate action plan because actions to meet near-term goals may not support or even be consistent with meeting long-term goals.
2. The City needs to provide substantial evidence that expected reductions from the proposed mitigation measures would actually be realized. At present, the calculations of emissions reductions, including the assumptions about compliance levels and covered projects, are not included in the record to support the quantified reductions. More problematic, many of the measures

rely on hortatory language (e.g., “encourage,” “promote,” “work with”). Emissions reductions for a climate action plan qualified under Section 15183.5 require enforceable mitigation with clear performance specifications, which, if applied on a project-by-project basis, would collectively achieve the specified emissions reduction.

3. The City needs to include an enforceable mechanism to monitor the plan's progress toward achieving the specified level of reductions and require amendment if the plan is not achieving that level.
4. The City needs to provide an environmental review of the climate action plan under CEQA before it could be used to streamline CEQA review of later activities.

We recommend that the climate coordinator be tasked with the further development of the Plan if the City intends to streamline future CEQA review of later projects.

Again, LandWatch applauds the City for taking these initial steps toward meaningful GHG emissions reductions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. DeLapa". The signature is stylized with large, overlapping loops and a long, sweeping tail.

Michael D. DeLapa  
Executive Director