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**RE: Comments on the Draft 2025 Climate Action and Adaptation Plan**

Dear City Staff and Commissioners,

LandWatch Monterey County is deeply concerned that the draft Pacific Grove Climate Action and Adaptation Plan is not, in fact, a climate action plan. It does not contain any credible climate action strategy: it provides no evaluation of its proposed actions, fails to prioritize actions based on the emissions inventory it does provide, omits critical analyses required by the approved scope of work, and is riddled with factual errors, unsupported claims, and internal contradictions. We urge the City to reject this incomplete draft and work with the consultant to produce a more rigorous, accurate, complete, and actionable climate action plan.

**1. The plan claims an analytical foundation that does not exist.**

The plan presents 20 goals, 70 strategies, and 166 action items. Its executive summary states that "scenario modeling tools were utilized to project the potential impacts of proposed strategies" (p. 7). Its prioritization framework claims to weight "GHG Reduction Potential" at 40% of each strategy's score (p. 18). Its "Top 10 Biggest Bang for Your Buck" list purports to identify the most cost-effective actions (Table A, p. 9). Each of these implies that the proposed strategies were evaluated for their ability to reduce emissions.

In truth, not a single action item includes an estimate of its emission reduction potential. There are no projections, no modeling results, and no cost-effectiveness comparisons anywhere in the document.

Without this data, the plan cannot tell the City which actions matter most—or at all.

## **2. The plan's priorities do not reflect the City's own emissions data**

Setting aside the lack of quantification, the plan's stated priorities do not align with the emissions profile it presents. The AMBAG-provided greenhouse gas inventory found that Pacific Grove's community-wide emissions in 2020 totaled 111,144 metric tons of CO<sub>2</sub>e (p. 20). Transportation accounts for 73% of community emissions. Residential and commercial energy together account for another 23%. Yet the "Top 10" list is almost exclusively municipal projects—microgrids, LED retrofits, energy storage systems, and leveraging 3CE's existing programs. Only one item in the Top 10 list aims to address community-wide emissions, through expanding EV charging and rebates.

This disconnect between the inventory data and the proposed priorities is a direct consequence of the absence of any analysis linking actions to emission outcomes.

## **3. The plan omits critical deliverables included in the approved scope of work**

The City Council [approved the consultant contract in January 2025](#). The scope of work specified several analytical deliverables that do not appear in this draft:

**Government operations GHG inventory.** The scope called for "GHG inventories for City operations and community activities." The plan relies solely on AMBAG's 2020 community-wide inventory and contains no accounting of the City's own operational emissions, despite proposing dozens of actions targeting municipal energy use, fleet vehicles, and facilities.

**Climate vulnerability assessment.** The scope required the consultant to "update climate vulnerability assessments to identify risks such as drought, heat, sea level rise, and wildfire" and "highlight disproportionate impacts on vulnerable populations." This entire deliverable is absent. Pacific Grove has a 2015 Climate Change Vulnerability Assessment, but the contract called for it to be updated, and it was not. The plan's adaptation and resilience strategies were developed without the analysis that was supposed to inform them.

**GHG reduction targets and emissions forecast.** The scope required the consultant to "recommend 2030 and 2050 GHG reduction targets aligned with state and global goals," and a GHG emissions forecast to help identify the additional actions required to achieve those targets. The plan includes no recommended targets of any kind, and no forecasts for how community-wide emissions will change over time from current state and national policies.

**Methodology to track and quantify emission reductions.** The scope required "a clear methodology to track and quantify emissions reductions." Without the analytical foundations described above,

there is nothing for such a methodology to measure. The plan references a "Climate Action Tracker" (p. 17) but does not describe what it would track or how.

Even if there have been adjustments to the original scope, these are not peripheral items. A GHG inventory, vulnerability assessment, reduction targets, and emissions forecast are the analytical foundation of a climate action and adaptation plan. Without them, the plan's 166 actions have no demonstrated connection to the problems they are supposed to solve.

#### **4. Factual errors, unsupported claims, and internal contradictions undermine the plan's credibility**

Beyond its analytical shortcomings, the draft contains numerous factual errors, unsupported claims, and internal contradictions. We highlight several of the most significant below.

The executive summary's "Goals, Strategies, and Actions" section (p. 8) claims that certain strategies were "identified for their cost-effectiveness and potential impact." This is demonstrably false—the plan contains no evaluation of the impact of any proposed action, and no cost-effectiveness analysis exists anywhere in the document. Similarly, the "GHG Inventory" section (p. 10) claims that the 2020 GHG inventory "serves as the foundation for this CAAP," but no analysis in the plan uses the inventory for target-setting or strategy evaluation.

The Introduction (p. 14) claims that "The CAAP reflects the principles of SB 743 by prioritizing strategies that reduce vehicle miles traveled (VMT) and support the transition to zero-emission mobility." SB 743 pertains to how CEQA analyzes transportation impacts—it is not directly applicable to climate action planning. The plan may confuse it with SB 375, which requires CARB to set regional targets for GHG emission reductions from transportation, and is implemented through AMBAG's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS).

Yet despite the MTP/SCS emphasis on VMT reduction, no VMT reduction strategies in this CAAP are ranked as Tier 1 or Priority 1, and none appear in the "Top 10 Biggest Bang for Your Buck" list—again, despite transportation accounting for 73% of community emissions. In its draft 2050 MTP/SCS, AMBAG has proposed a number of VMT mitigation strategies that should be implemented by land use jurisdictions, including requiring incorporation of affordable housing into development projects and increasing density, infill, and transit-oriented development. (AMBAG, 2050 MTP/SCS DEIR, p. 4.15-29.) The CAAP should at minimum evaluate and prioritize these mitigation strategies.

The Prioritization section (p. 18) identifies three priority tiers, ostensibly ranked by potential impact on GHG emission reductions. However, under this tier structure, Tier 1 items are "immediate priorities," Tier 2 items are "critical elements," and Tier 3 items are "cornerstones to the CAAP's

ability to succeed.” When every tier is described as essential, the framework ceases to distinguish anything.

The very first strategy proposed (RE 1.1, p. 26) is to “Consider a crowdfunding residential and commercial bulk purchasing solar campaign... to bring upfront costs down.” This action proposes, in essence, that the City run a Kickstarter-style campaign to help residents install solar panels. It is ranked Tier 1 Foundational, Priority Score 1, and rated favorably for GHG emission reduction potential—despite the fact that 3CE already provides 100% carbon-free electricity to residents and businesses, meaning there would be essentially zero emissions benefit from additional rooftop solar.

Appendix A analyzes the addition of battery storage to an “existing 62.08 kW DC PV array” at the Public Works Yard (p. 99). No such solar installation currently exists at this site. The system’s proposed development is discussed elsewhere in the document as a future project (Appendix C, p. 97; Action RE 5.1.2, p. 32), where its capacity is variously stated as 62.08 kW (pp. 138, 149) and 40 kW (pp. 141, 142).

A more extensive—but still not exhaustive—list of errors, inconsistencies, and unsupported claims is attached as Appendix A.

Individually, any one of these issues might be dismissed as an oversight. Collectively, they reveal a pattern: the plan repeatedly asserts that analysis was performed when it was not, claims alignment with goals it does not pursue, and presents frameworks that do not function as described. This is not a document that can be corrected with minor revisions.

## **Conclusion**

LandWatch supports Pacific Grove’s effort to address climate change. A well-developed CAAP would serve the community for years as a genuine roadmap for reducing emissions and building resilience. This draft is not that document. It presents the form of a climate action plan without the analytical work that gives a plan its value.

We respectfully request that the City decline to accept this draft and direct the consultant to produce a revised plan that includes, at minimum:

1. A government operations GHG inventory;
2. An updated climate vulnerability assessment;
3. Community-wide and government operations GHG reduction targets for 2030 and 2050;

4. A business-as-usual emissions forecast;
5. Quantified GHG reduction estimates for proposed actions; and
6. A revised prioritization of strategies grounded in that analysis and aligned with the City's actual emissions profile.

LandWatch's climate science and planning consultant recommends the [City of Solano Beach's CAP](#) and [Half Moon Bay's CAP](#) as good models for Pacific Grove.

Pacific Grove deserves a plan equal to the challenge it faces. We urge the City to hold its consultant to the standard the community was promised.

Regards,

A handwritten signature in black ink, appearing to read "Michael DeLapa". The signature is stylized and cursive.

Michael DeLapa  
Executive Director

## **Appendix A: Additional Errors, Inconsistencies, and Unsupported Claims**

The following is a more detailed—but still not exhaustive—accounting of errors, unsupported claims, and internal contradictions identified in the draft CAAP.

### *Executive Summary*

The Executive Summary makes significant claims about the CAAP's content that do not correspond to the content itself. The "Purpose and Scope" section (p. 6) does not refer to the purpose or scope of the CAAP as set out in the contract approved by the City. The "Strategy Development" section (p. 7) does not provide any specifics as to how strategies were developed or evaluated. The Conclusion section (p. 11) states that "The overarching goal of the CAAP is to bring community benefits and financial resources to create better air quality and quality of life to every resident who lives within the City," in contrast with the "Purpose and Scope" section, which made no such claims.

### *Introduction*

The Introduction (p. 14) states: "The City can align its climate action efforts with California's statewide climate and resilience priorities by ensuring the CAAP reflects the goals of SB 32, AB 1279, and the California Climate Adaptation Strategy. The CAAP should maintain consistency with the California Air Resources Board's Scoping Plan by setting measurable GHG reduction targets and incorporating strategies that advance carbon neutrality by 2045." Those goals are never mentioned again, the specifics of what those goals require (beyond carbon neutrality) are not provided, and the CAAP does not follow its own recommendation to "set measurable GHG reduction targets."

The Introduction also states: "To meet the state's energy mandates, the City will continue to leverage Central Coast Community Energy's (3CE) 3CPrime program, which provides a 100% renewable electricity option to local customers." There are no applicable state energy mandates which 3CE helps the City to meet.

### *Approach to Developing the CAAP*

The "Approach to Developing the CAAP" section (p. 16) claims the plan is "rooted in a community-driven planning process, centered on inclusive engagement with key stakeholders," and that "each strategy within the CAAP was evaluated for its feasibility, effectiveness, and consistency with existing policies." No information is provided on who was engaged, who the key stakeholders were, how inclusion was considered, what participation was achieved, or what local priorities were identified. There is no information as to what the feasibility, effectiveness, and consistency determinations were for each action.

### *Prioritization*

The Prioritization section (p. 18) identifies three priority tiers, ostensibly ranked by potential impact on GHG emission reductions. However, under this tier structure, Tier 1 items are “immediate priorities,” Tier 2 items are “critical elements,” and Tier 3 items are “cornerstones to the CAAP’s ability to succeed.” When every tier is described as essential, the framework ceases to distinguish anything. Furthermore, each strategy’s “Priority” score simply mirrors its tier level—all Tier 1 items are Priority 1, all Tier 2 are Priority 2—adding no additional information.

The co-benefits weighting description (p. 18) states that “the second step involves numerically assigning co-benefits to each strategy” and that “each co-benefit is then assigned a specific percentage based on its contribution to reducing GHG emissions.” This description does not make sense as written: co-benefits are evaluated, not numerically assigned; the percentage weightings shown (GHG Reduction Potential 40%, Cost 10%, Capital Costs vs. Available Funding 10%, Equity 10%, Community Benefits 30%) are pre-selected weighting categories, not percentages derived from contributions to GHG reduction. Furthermore, the results of this “second step” do not appear anywhere in the report.

### *Stakeholder Engagement*

The stakeholder engagement section states that “two public workshops” were held (p. 19), with input from over 100 participants. Only one workshop is listed on the City’s website, in April 2025, and no record or documentation of any community input is listed or discussed in the report itself.

### *GHG Inventory*

The GHG Inventory section (p. 20) states: “Usage data was gathered from primary and secondary sources and multiplied by emission factors provided by the U.S. Environmental Protection Agency.” However, as noted in the following paragraph, the CAAP did not collect any usage data or use any emission factors—the GHG inventory was provided by AMBAG in 2022. This section also claims “The City commits to updating its GHG inventory every five (5) years,” but no such action is listed in the CAAP, nor is this commitment mentioned anywhere else in the document or in other City materials.

### *Strategies and Actions*

The #1 item in the “Top 10 Biggest Bang for Your Buck” list (p. 9) is identified as RE 1.3. There is no RE 1.3 anywhere else in the CAAP. Where the other items in the Top 10 appear to be high-level strategies, the item described as “RE 1.3” most closely matches RE 5.1.2, a specific, targeted action—raising questions about the accuracy of the prioritization list itself.

Goal RE 5 recommends “Implement a DER program to reduce peak demand.” The only strategy under this goal, RE 5.1, exclusively focuses on municipal locations and refers to Appendix A for more details.

Figure D (p. 35) identifies the Pacific Grove PERC Water Treatment Plant as “near the intersection of Ocean View Boulevard and Central Avenue.” These roads do not intersect. The PERC Water Treatment Plant is located at 1313 Ocean View Boulevard, over a mile from Central Avenue.

#### *Funding Sources*

Many of the funding sources listed in the “Funding” section appear to be outdated, no longer accepting applications, or references to tools and other lists of funding sources rather than specifically identified funding sources themselves.

#### *Appendices*

Figure A-1 (p. 101) includes a Sankey chart with percentages that total to 200%. All sources flow directly to a percentage value without indicating any merging or diverging, except for “Grid purchases” and “Battery discharge to load” which combine to a single unlabeled value.

Appendix B (p. 109) lists annual cost estimates that do not match the descriptions given (such as RS 4.1 “Require city-funded... climate projects... to include local hire targets,” which should only require staff time but estimates \$107,200 in annual costs); total project costs that do not match the annual costs given (such as RE 2.1, expected to cost \$10,000 per year for two years with a total cost of \$40,000); and “possible funding sources” that include “Avoided income” (which is an additional cost, not a revenue source) and vague “Partnerships” (unspecified).

The cover identifies this as the “2025” CAAP; the purpose and scope section calls it the “2026 CAAP” (p. 6).