

March 31, 2026

Pacific Grove City Council  
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**RE: Comments on the Final Draft 2025 Climate Action and Adaptation Plan**

Dear City Council,

LandWatch remains deeply concerned that the draft Pacific Grove Climate Action and Adaptation Plan is not, in fact, a climate action plan. The City's Beautification and Natural Resources Commission recognized that on February 17, when it voted to send the draft back to the consultants for substantial revision. The Final Draft sent to you for consideration contains augmented material not included in the earlier draft.

Unfortunately, on the most fundamental points raised in our [February 9th letter](#), the plan remains largely unresponsive. Above all, there is still no analysis of the impacts of the actual proposed actions –the policy forecast simply assumes that full community-wide electrification and EV adoption will be achieved, without indicating how much progress and impact each action is expected to make.

LandWatch is also concerned with the inadequate review period for a “final draft,” which we understand to be substantially updated from the February 9 draft. No member of the public, and presumably City Council members as well, could possibly conduct a meaningful review of a nearly 200 page document under such a short timeframe. Additionally, the updated draft fails to indicate where sections have been revised or added, leaving readers with no other option than to conduct a side by side comparison of the two lengthy documents. Public participation should not be such an uphill battle.

In light of the rush review, we've provided below a point-by-point assessment put together with substantial assistance from Anthropic's Claude artificial intelligence application. The content has

been reviewed and edited by LandWatch staff, but given the length and complexity of the Plan and the short (2-day) period for review, our analysis may include errors and omissions.

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### **1. "The plan claims an analytical foundation that does not exist" – Slightly Addressed**

LandWatch's lead criticism was that the plan claimed scenario modeling was used to project strategy impacts, but not a single action item included an emission reduction estimate.

The final CAAP does add new forecasting content that was absent from the draft: a Business-as-Usual (BAU) forecast, an Adjusted Business-as-Usual (ABAU) forecast, and a "Top 10 Emission Reduction Forecast" with a chart (Figure E, p. 27–28) showing an emissions pathway through 2045 under full implementation of the top ten strategies.

Nevertheless, the ABAU is abysmal:

1. It states that there will be a decline in electricity emissions to net zero by 2045 due to the California Carbon Allowance (CCA), when in fact electricity emissions are already ~0 from the CCA;
2. The ABAU chart shows no change in residential or commercial energy, which suggests that either there is an error or the statement about declining electricity emissions is incorrect because they are already assumed to be zero; and
3. The order of the legend does not match the order of the chart (same problem with the BAU chart).

Furthermore, the core problem LandWatch identified – that no individual action item includes a quantified GHG reduction estimate – remains entirely unaddressed. The emission reduction scenario is described only at the level of broad sector narratives ("full community-wide electrification is estimated to eliminate emissions from the natural gas sector entirely") without any specific numbers attached to specific actions. The forecasting is qualitative and directional, not the action-level quantification LandWatch requested. The plan still cannot tell the City which of its 172 actions matter most.

Additionally, the policy forecast chart falls far short of what is needed for an effective plan: the "Top 10 emission reduction forecast" assumes that the ten highest-impact strategies in the CAAP (presumably the "Top 10 Bang for your Buck" items) would achieve a "near-complete" decarbonization of transportation and building energy use, even though the actual Top 10 items do not realistically outline a pathway to that goal (the relevant Top 10 items say "Complete a community-wide electrification study and establish a long-term implementation plan" and "Accelerate the transition to EVs community-wide by making charging more accessible"). It also

completely changes the color scheme and order of emissions categories in the chart, making it difficult to compare.

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

LandWatch pointed out that transportation accounts for 73% of community emissions, yet the Top 10 list was almost exclusively municipal projects, with only one item addressing community-wide emissions.

The final Top 10 list (Table A, p. 9) is revised from the draft and now includes three transportation-related items: a municipal Fleet Electrification Plan (TR 1.1), EV charger installation at city facilities (TR 1.2), and community-wide EV transition support (TR 1.3). This is an improvement over the prior draft.

However, the Top 10 still concentrates on municipal operations and EV electrification. LandWatch specifically called out the absence of VMT reduction strategies and land-use-based measures, citing AMBAG's MTP/SCS strategies for affordable housing, density, infill, and transit-oriented development. The final plan does include expanded strategies and actions under Goal TR 2 ("Support Transit-Oriented Development") and various active transportation strategies under TR 3, but none of these appear in the Top 10, and none are ranked Tier 1. The final version maintains the plan's bias toward electrification over VMT reduction and land use change.

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

**Government operations GHG inventory:** Not added. The plan relies exclusively on the AMBAG 2020 community-wide inventory and contains no separate accounting of city operational emissions, despite dozens of actions targeting municipal energy use, fleet vehicles, and facilities.

**Updated climate vulnerability assessment:** Not added. The adaptation and resilience sections (pp. 73–92) address sea level rise, coastal erosion, wildfire, and extreme weather, but these strategies were not developed from a freshly updated vulnerability assessment. The 2015 assessment remains the last one completed; there is no indication the contract deliverable was fulfilled.

**Tracking methodology:** Barely addressed. The Climate Action Tracker section (p. 17) is essentially identical, describing the Tracker's functions in general terms. It still fails to specify what will be measured, how emission reductions will be quantified, or how progress will be reported publicly.

LandWatch's specific complaint – that the Tracker is described without explaining what it would actually track – is not resolved.

#### **4. "Factual errors, unsupported claims, and internal contradictions" – Selectively Corrected**

LandWatch's Appendix A catalogued a long list of specific errors. The final plan corrects only some. We note below the errors that remain.

**The "existing" solar array at Public Works Yard:** Appendix A describes adding battery storage to an "existing 62.08 kW DC PV array" that doesn't actually exist yet, while elsewhere the document treats it as a future project. The final Appendix A (p. 108) still describes analyzing "the addition of battery storage to the City of Pacific Grove's Public Works Yard solar carport system" and refers to the "existing 62.08 kW DC PV array." The carport figures in the main body (p. 44) describe it using future conditional language ("could generate"), while Appendix A treats it as existing. The internal contradiction is not resolved.

**The PERC Water Treatment Plant location:** LandWatch noted that the plan placed the PERC facility "near the intersection of Ocean View Boulevard and Central Avenue," which is wrong – those streets don't intersect, and the plant is over a mile from Central Avenue. The final plan (p. 42) includes the same error.

**"Strategy evaluation" claims in the executive summary:** LandWatch flagged that the plan claimed strategies were "identified for their cost-effectiveness and potential impact" when no such analysis existed. The final executive summary (p. 8) retains this language verbatim: strategies are described as "identified for their cost-effectiveness and potential impact." This unsubstantiated claim was not corrected.

**The document's self-identification year:** LandWatch noted the cover says "2025 CAAP" while p. 6 calls it the "2026 CAAP." Both remain in the final plan – the cover reads "2025" and p. 6 reads "2026."

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## 5. LandWatch's Six Specific Requests – Summary Assessment

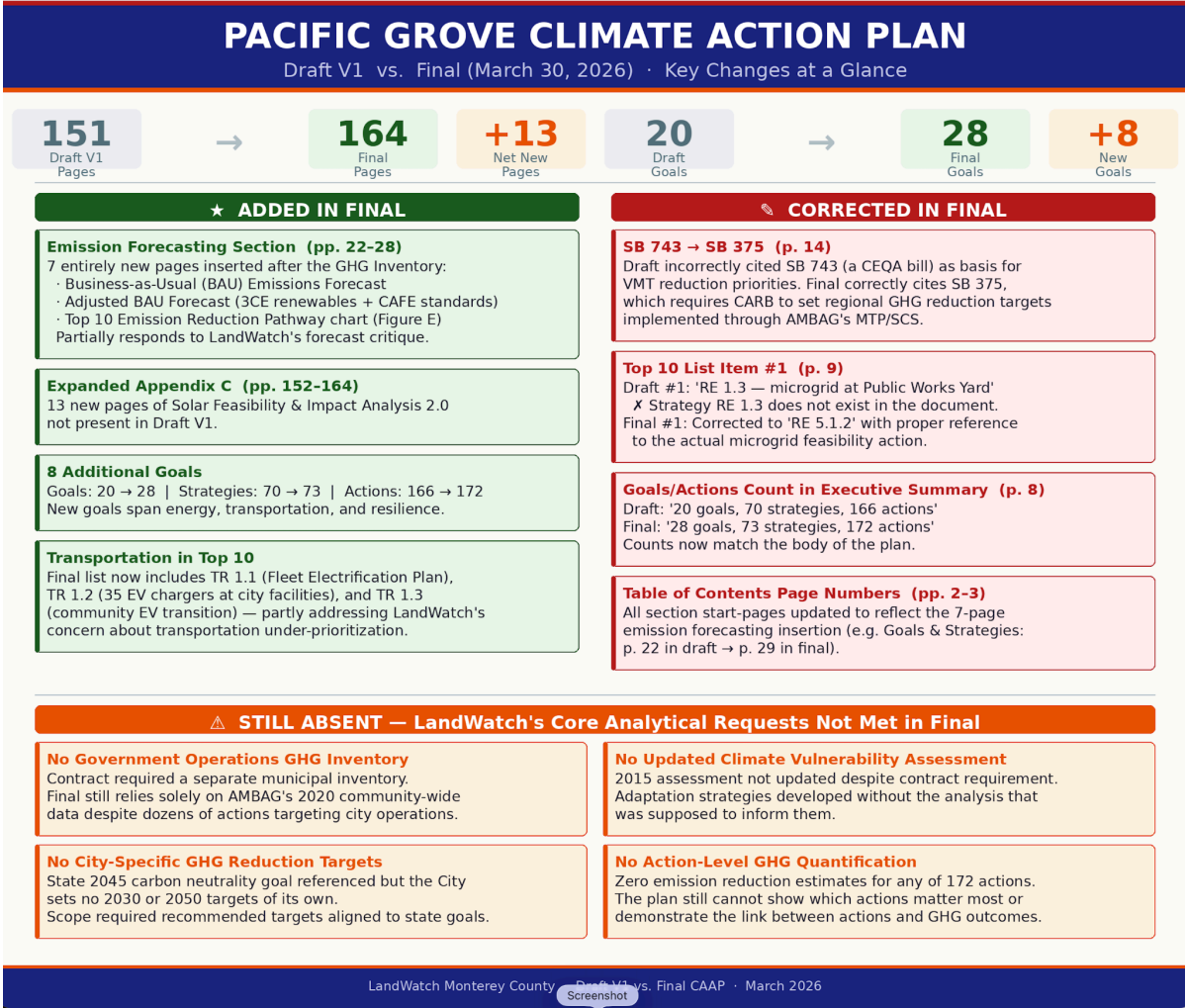
LandWatch concluded by asking the City to require the consultant to produce, at minimum:

1. **A government operations GHG inventory** – Not provided.
2. **An updated climate vulnerability assessment** – Not provided.
3. **Community-wide and government operations GHG reduction targets for 2030 and 2050** – State targets referenced but City-specific targets not set.
4. **A business-as-usual emissions forecast** – Provided, but inadequately. This is the clearest direct response to LandWatch's comments, but the product falls short of what is needed.
5. **Quantified GHG reduction estimates for proposed actions** – Not provided at the action level.
6. **A revised prioritization grounded in that analysis and aligned with the City's actual emissions profile** – Partially addressed (transportation is better represented), but not grounded in action-level quantification as requested.

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### Summary

The final CAAP reflects some changes in response to LandWatch's comments – the emissions forecasting material is new and substantive and some factual errors were corrected. But the plan was not fundamentally re-conceived. The two most structurally important deficiencies LandWatch identified – the absence of action-level GHG quantification and the absence of a municipal operations inventory – remain. The plan still cannot demonstrate that its 172 actions will collectively achieve any specific emissions target, because the plan doesn't provide one. More difficult than hitting a moving target is hitting no target at all. Without including emissions targets tailored to the City, the CAAP will remain ineffective and inadequate.



**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. It provides optics only and no substance.

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 recommends [Monterey County's Community Climate Action and Adaptation Plan](#), 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. For a \$95K investment, the City deserves a much better return.

Regards,

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

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Executive Director

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