

Summary of Progress To-Date

- Initiated plan update in December 2024:
 - Data request to agencies
 - GHG inventory and climate vulnerability assessment development
 - Action development
 - Public outreach
 - Benefit analysis and action evaluation
 - Draft and Final Plan
- CAPAC – first meeting August 2025:
 - Reviewed GHG inventory
 - Reviewed, selected, and removed actions
 - Reviewed and selected GHG targets
 - Reviewed and selected co-benefits
 - Reviewed climate vulnerability assessment, adaptation actions, benefit analysis
 - Draft and Final Plan

Context for the CCAAP

- Funded by the EPA to provide a regional climate action plan for the Stockton-Lodi Metropolitan Statistical Area (MSA, unincorporated San Joaquin County and all cities within the County)
- Does not fulfill regulatory requirements
- Provides a regional roadmap for GHG reductions for the MSA, not specific to City of Stockton
- Can serve as an *optional* foundation for cities to adopt or align strategies into other planning documents (e.g., general plans), grant applications, and ordinances and codes (e.g., building codes)
- Does not need CEQA analysis

Public Comment Overview

- Draft CCAAP was available online and in-person at community events and the public library
- Public comment period: March 19 to April 30, 2026
- Total comments received: 87
- Responses received as a letter were noted as 1 comment.



Feedback

What feedback do you have for this chapter?
Tell us what you think

Enter a response

First Name * Last Name *

Contact Email

Organisation

Address

Postcode *

[PROVIDE FEEDBACK](#)

Summary of Comments Received on Draft CCAAP

| Theme | Comments | General Response |
|---|--|---|
| Urban Tree Canopy & Green Space | | |
| Planting Quantity & Priority Locations | <ul style="list-style-type: none"> Many comments noted that tree planting is insufficient citywide, with underserved schools and redlined neighborhoods lacking canopy entirely. | Noted, no action for the CCAAP |
| Tree Protection & Maintenance | <ul style="list-style-type: none"> City is removing and cutting trees; residents want a replacement ordinance and consistent maintenance. | Ongoing efforts are underway* and do not need to be called out by the CCAAP |
| Baseline Inventory & Standards | <ul style="list-style-type: none"> No existing tree inventory; plan needs a canopy baseline before setting priorities. | Ongoing efforts are underway* and do not need to be called out by the CCAAP |
| Mormon Slough Restoration Project | <ul style="list-style-type: none"> Many comments noted that the Mormon Slough restoration project is not included in the adaptation actions. | Noted, can guide implementation roadmaps |
| Parks, green space, and community gardens | <ul style="list-style-type: none"> Many comments noted an absence of parks, community gardens, and usable green space in their neighborhoods, particularly in South Stockton. | Noted, can guide implementation roadmaps but no action for the CCAAP |
| Plan Enforcement & Measurability | | |
| CEQA Compliance | <ul style="list-style-type: none"> The plan does not state whether it is intended to be CEQA-compliant under §15183.5, and that as written it fails three of the five required elements: no GHG emissions identified per action (C), no project-level performance standards (D), and no monitoring and amendment mechanism (E). | Noted, no action for the CCAAP. |
| CARB & State Alignment | <ul style="list-style-type: none"> Plan not consistent with CARB 2022 Scoping Plan Appendix D or BAAQMD guidelines. | Noted, no action for the CCAAP |
| Monitoring & Progress Tracking | <ul style="list-style-type: none"> The plan admits it will achieve only a 12% GHG reduction by 2030 against a state target of 39%, yet contains no mechanism to trigger revision if targets are missed. | Noted, no action for the CCAAP |

Summary of Comments Received on Draft CCAAP

| Subtheme | Comments | General Response |
|---|---|---|
| Equity & Burdened Communities | | |
| Intentional Investment in Disadvantaged Areas | <ul style="list-style-type: none"> Several comments noted that the plan does not guarantee climate actions will be intentionally routed through burdened communities rather than simply made available to them. | <ul style="list-style-type: none"> CCAAP can recommend action prioritization in communities but implementation is up to agencies |
| Equity Screening Tool | <ul style="list-style-type: none"> Comments noted that the plan relies solely on CEJST without explanation, and that CEJST has been an unofficial, non-government copy since January 22, 2025. | <ul style="list-style-type: none"> CEJST was recommended for use for EPA CPRG grant programs |
| Community Benefits at New Development | <ul style="list-style-type: none"> Comments noted that the plan does not require new development projects to deliver community benefits or green improvements in disadvantaged areas. | <ul style="list-style-type: none"> Noted, CCAAP does not have requirements for new development. |
| Multilingual Access & Translation | <ul style="list-style-type: none"> Comments noted that the plan has no metric for whether multilingual outreach is reaching Spanish-speaking residents. | <ul style="list-style-type: none"> Initial survey and workshop translated materials |
| Active Transportation – Bikes, Sidewalks & Pedestrian Safety | | |
| Bike and Sidewalk Network Gaps & Safety | <ul style="list-style-type: none"> Many comments noted that existing bike infrastructure is unsafe and disconnected, with no protected lanes on high-speed corridors and no regional network linking Stockton to neighboring cities. Some comments noted deteriorating sidewalks, potholes, and curb flooding as urgent safety issues not addressed in the plan, particularly in South Stockton and for wheelchair users. Several comments noted that streets lack basic features needed for active transportation like lighting after dark, water fountains along bike paths and that heavy freight continues through South Stockton residential areas without rerouting. | <ul style="list-style-type: none"> CCAAP actions aim to close gaps in bicycle network and improve pedestrian networks |
| Safe Routes to School | <ul style="list-style-type: none"> Comments noted that students do not feel safe on school buses, and that the City's existing 2017 Safe Routes to School Plan has not been assessed for implementation — yet the plan proposes creating a new one. | <ul style="list-style-type: none"> Assessment of 2017 plan should take place as part of plan update |
| Supporting pedestrian infrastructure | | |

Summary of Comments Received on Draft CCAAP

| Subtheme | Comments | General Response |
|---|--|--|
| Inter-Governmental Coordination | | |
| Documentation of Coordination | <ul style="list-style-type: none"> While 16 government agency interviews were conducted, no notes or agreed commitments from those meetings are included in or attached to the plan. | <ul style="list-style-type: none"> Meeting notes and action items have been documented for the City |
| Formal Adoption by All Jurisdictions | <ul style="list-style-type: none"> There is no evidence the other seven cities and the County have formally reviewed or accepted their named implementation roles in the plan. | <ul style="list-style-type: none"> City has reached out to other agencies and partners throughout project |
| SJCOG as Implementation Partner | <ul style="list-style-type: none"> SJCOG noted that it is not named as an implementation partner for transportation actions despite being the regional planning agency, and that the Regional Climate Collaborative, Mobility Hub Plan, and Cabral Station priority hub are absent from §9.1.1. | <ul style="list-style-type: none"> Noted, SJCOG can be added |
| GHG Inventory | | |
| Industrial Facility Omissions | <ul style="list-style-type: none"> DTE Cogeneration — Stockton's single largest stationary emitter, unreported since 2016 — and the Tracy Combined Cycle Power Plant are absent from the inventory while comparable facilities are included, with no justification provided. | <ul style="list-style-type: none"> Emissions from energy are inventoried based on consumption and not generation |
| Transportation Sector Breakdown | <ul style="list-style-type: none"> The transportation section has no mode-by-mode emissions breakdown, and that Port of Stockton data is limited to a single tonnage figure with no vessel counts, ship types, or berthing time. | <ul style="list-style-type: none"> VMT data is available by various modes (bus, personal vehicle, trucks; offroad; etc) |
| Inventory Methodology | <ul style="list-style-type: none"> The methodology for assigning MSA-wide emissions is not disclosed in the plan. | <ul style="list-style-type: none"> Methodology is documented in CCAAP |

Summary of Comments Received on Draft CCAAP

| Subtheme | Comments | General Response |
|---|--|--|
| Funding & Financing | | |
| Expanded Funding Source List | <ul style="list-style-type: none"> Comments noted that the plan's funding section omits numerous relevant grant programs and does not recognize existing city and county plans as climate-smart funding intersections. | <ul style="list-style-type: none"> Funding & financing focused on grants for GHG mitigation strategies |
| Proposition 4 as Priority | <ul style="list-style-type: none"> SEJEA noted that Proposition 4 is not identified as a priority in the plan. | <ul style="list-style-type: none"> Proposition 4 funding can be applied to some of the adaptation strategies but is not a focus of the plan |
| Municipal Financing Mechanisms | <ul style="list-style-type: none"> The plan does not identify available municipal financing mechanisms, including Climate Resilience Districts or the City's 6% utility tax — the only such tax collected in San Joaquin County. | <ul style="list-style-type: none"> Can be added to funding chapter |
| Public Engagement | | |
| Inadequate Notice & Attendance | <ul style="list-style-type: none"> The final public meeting was noticed just three days in advance, was poorly attended, and received far less outreach effort than other city planning processes running concurrently. | <ul style="list-style-type: none"> Noted, best attempt attempts were made at outreach |
| Content Accessibility & Format | <ul style="list-style-type: none"> Comments noted that releasing the full plan at once made it too large to engage with meaningfully, and that the Chapter 7 action details had never been presented at public meetings before appearing in the draft. | <ul style="list-style-type: none"> Noted, actions were not ready earlier due to planning timeline |
| Data Accuracy & Corrections | | |
| Demographic Data Errors | <ul style="list-style-type: none"> The plan cites population figures that are 2–4 years out of date and characterizes the region as 'rapidly growing' — a claim that contradicts the plan's own cited source. | <ul style="list-style-type: none"> Baseline year selected for complete data availability |
| Editorial & Visual Errors | <ul style="list-style-type: none"> The Office of Environmental Sustainability is mislabeled as a Division, the City and County OES structures are conflated, and key terms defined in the text are missing from the definitions section. Comments identified three typos, noted that GHG figures lack comparative context, and pointed out visual/design issues. | <ul style="list-style-type: none"> Noted, can be updated. |

Summary of Comments Received on Draft CCAAP

| Subtheme | Comments | General Response |
|---|--|--|
| Nature-based Solutions | | |
| Carbon Removal Distinctions | <ul style="list-style-type: none"> Comments noted that the plan's funding section omits numerous relevant grant programs and does not recognize existing city and county plans as climate-smart funding intersections. | <ul style="list-style-type: none"> Noted, funding and financing chapter focuses on GHG mitigation |
| Groundwater, Stormwater & Wetlands | <ul style="list-style-type: none"> SEJEA noted that Proposition 4 is not identified as a priority in the plan. | <ul style="list-style-type: none"> Noted, funding and financing chapter focuses on GHG mitigation |
| Emerging Technology Impacts | | |
| AI Data Centers & Energy Demand | <ul style="list-style-type: none"> The plan does not evaluate the energy and water impacts of hyperscale AI data centers being proposed in the region, and that no proactive land use framework exists for them. | <ul style="list-style-type: none"> Not part of CCAAP; should be addressed in other plans |
| Hydrogen & Bioenergy | <ul style="list-style-type: none"> T19 (hydrogen fueling infrastructure) was understood to have been deprioritized during development yet still appears in the plan without specifying green hydrogen only. | <ul style="list-style-type: none"> Noted, can be adjusted |
| Outdated or Completed Actions | <ul style="list-style-type: none"> Action EG3 directs the City to join Ava Community Energy which is something the City has already done. | <ul style="list-style-type: none"> CCAAP is for MSA region, not just City |
| Air Quality | | |
| Outdoor health | <ul style="list-style-type: none"> Many comments noted that poor air quality is not directly addressed in the plan as a community health priority. | <ul style="list-style-type: none"> Air quality is a co-benefit for many actions |
| Heavy freight and truck traffic | <ul style="list-style-type: none"> Comments noted that heavy freight traffic through South Stockton residential areas is not adequately addressed, and that T17 and T18 lack accountability measures for actual emissions reductions. | <ul style="list-style-type: none"> Noted, CCAAP includes action to create freight plan |