

#	Date (UTC)	What feedback do you have for this chapter?: Tell us what you think	Email	First Name	Last Name	Organization	Address	Zip Code	Item Name
1	2026-05-01 17:58:48	While these actions are intended to be implemented across the whole Stockton MSA region, how do we ensure benefits to burdened communities are not an after thought and instead, plan for direct benefits in burdened communities that also benefit the rest of the region? For example, safe and connected bike lanes that are routed through the general region and are intentionally planned and designed to pass through burdened communities as well.	morokotuy@gmail.com	Morokot	Uy		3830 Alvarado Ave Apt 32	95204	/stocktonccaap/page/burdenedcommunitybenefitsanaly
2	2026-05-01 06:36:53	Local Corps need additional funding and support. written prioritization will help show local orgs what is needed and what gaps need to be addressed.	alex.lima@tpl.org	Alex	Lima	Trust for Public Land	alex.lima@tpl.org	95209	/stocktonccaap/page/workforceplanninganalysis#b0996668-620e-cbb4-a805-
3	2026-05-01 06:34:30	Any Park/ Greenspace grant should be seen as a potential nature based solution for some of these climate actions. Other funding sources with state include Bric, SPP, EPA Brownfield site funding, Ca Farmland Conservancy, Community Resilience Centers, explore the coast, Extreme heat and community reliance fund, ORLP, prop 4, SB 1 sea level rise grants, sustainable Groundwater program, WCB grants.	alex.lima@tpl.org	Alex	Lima	Trust for Public Land	alex.lima@tpl.org	95209	/stocktonccaap/page/otherfundingsources#0f73d492-85e1-6360-6489-b319e4774a25
4	2026-05-01 06:20:03	Additional plans such as the City Parks Master Plan and Bike Master Plan, the County Park plan, and Local cbo Planning efforts should also be seen as potential climate smart intersections.	alex.lima@tpl.org	Alex	Lima	Trust for Public Land	alex.lima@tpl.org	95209	/stocktonccaap/page/otherfundingsources#7fcdabd7-fbbf-045a-2755-6bcd6848c650
5	2026-05-01 06:16:12	T1, T2, and T2 offer a great opportunity to “hit two birds with one stone” with incentivizing clean transportation and potentially Climate resilient infrastructure such as tree/planter protected bike lanes, micro and pocket parks as a component of getting people on their feet and two wheels instead of 4	alex.lima@tpl.org	Alex	Lima	Trust for Public Land	alex.lima@tpl.org	95209	/stocktonccaap/page/climateactions
6	2026-05-01 06:15:16	- Plan should specify the need to cross reference this heat metric with other metrics, maps and other datasets in order to prioritize locations for maximum carbon benefits.	alex.lima@tpl.org	Alex	Lima	Trust for Public Land	alex.lima@tpl.org	95209	/stocktonccaap/page/climatevulnerabilityassessment
7	2026-05-01 06:14:32	- the regional urban forest master plan should look to existing industry standards [Urban & Community Forestry Society (UCFS), Sustainable Forestry Initiative’s (SFI) Urban and Community Forest Sustainability Standard] in order to bring the City in line and more competitive for landscape scale canopy projects.	alex.lima@tpl.org	Alex	Lima	Trust for Public Land	alex.lima@tpl.org	95209	/stocktonccaap/page/GHGReductiontargets

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8	2026-05-01 06:13:57	TPL is in great support of Actions S1, S2, S3, and A2. We encourage public park projects, especially those with Climactic nature based solutions (stormwater capture/cleaning, increased tree canopy, native planting, etc) can have very interesting and funding sources. -The plan should specify the ecological and carbon sink effects of native vegetation, old growth native trees, and the benefits of thriving wildlife corridors/zones. -The city should utilize the State's Natural Resources Agency lan	alex.lima@tpl.org	Alex	Lima	Trust for Public Land	alex.lima@tpl.org	95209	/stocktonccaap/page/GHGreductiontargets
9	2026-04-30 19:55:13	Develop an extreme heat action plan and conduct outreach campaigns to enhance community understanding of how to be prepared for extreme heat” to make sure it includes co-occurrence of heat and smoke as well as supporting trusted messenger networks to develop neighbor check programs, as many people will not access cooling/clean air centers. (FYI: My organization is working with the SJ County Dept of Public Health Services on an Extreme Heat Plan for SJ County)	bsattler@usfca.edu	Barbara	Sattler	California Nurses for Environmental Health and Nursing	PO Box 1339	95436	/stocktonccaap/page/acknowledgment
10	2026-04-30 19:14:48	Well organized and easy to read with plain language considerations.	kxiong@sjgov.org	Kia	Xiong	Office of Emergency Services	2101 E Earhart Ave Ste 300	95206	/stocktonccaap/page/home
11	2026-04-30 16:34:26	Encourage people to buy from local venders. promote small businesses. Hire workers that live in this county. More workforce training for green jobs.		Jennifer	Flores			95206	/stocktonccaap/page/home
12	2026-04-28 22:03:48	I would love to see the city implement more connected bicycle lanes throughout Stockton. West Lane needs a boldly marked bike lane very urgently. The speed limit is posted at 40 mph. Cars drive down this street excessively fast, making it very dangerous for cyclists and pedestrians. More cyclists and walkable neighborhoods will help to reduce vehicle emissions overall.	pechtr@gmail.com	Tiffany	Pech	Little Manila Rising	1638 West Lane	95205	/stocktonccaap/page/home
13	2026-04-28 18:46:22	Figure 33, I think without intent, uses the color black to describe the portion of black workers, and the color red to describe American Indian workers. That has to be a bad coincidence, and it's gotta change before publication	ben@jex.zone	Benjamin	Jex		1001 W Swain Rd, Apt 54	95207	/stocktonccaap/page/workforceplanninganalysis
14	2026-04-27 22:22:48	Little Manita Rising is really impressive when it comes to tree education and awareness. Really great!		John	Mainopaz			95210	/stocktonccaap/page/home
15	2026-04-27 22:20:07	Stop removing trees from city	anastasia.dnd1@gmail.com	Anastasia	Fuentes			95210	/stocktonccaap/page/home

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16	2026-04-27 22:17:47	I appreciate this opportunity of serving the community		Miguel	Ramirez			95206	/stocktonccaap/page/home
17	2026-04-27 22:14:57	public lighting, more trees & maintenance		Matt	Henderson			95219	/stocktonccaap/page/home
18	2026-04-27 22:05:42	Clean up the streets and improve them	JJAdams4744@gmail.com	Joseph	Adams			95204	/stocktonccaap/page/home
19	2026-04-27 22:03:04	I would like to ask the city to stop wasting money on TPA; should save the extra money to plant trees	donantonio7878@gmail.com	Donald	Galindo			95207	/stocktonccaap/page/home
20	2026-04-27 21:59:20	Better care for our streets and concrete from the city! Major potholes and danger being caused by the city lacking care of the pavement.	petersonprecious511@gmail.com	Precious	Peterson			95209	/stocktonccaap/page/home
21	2026-04-27 21:43:35	More trees please!		Nissa	Kaylee			95205	/stocktonccaap/page/home
22	2026-04-27 21:42:40	I dont like doing PE because the air is dirty		Branden	Figuroa			95205	/stocktonccaap/page/home
23	2026-04-27 21:41:06	Getting ICE out of this city will make a lot safe		Alexis	Cahill			95205	/stocktonccaap/page/home
24	2026-04-27 21:37:56	I think more trees		Kathy	Davis			95205	/stocktonccaap/page/home
25	2026-04-27 21:36:30	i would like to see less homelessness and more homeless housed. Fixed roads! No HOA!!!		Robert	Zimmermen			95209	/stocktonccaap/page/home
26	2026-04-27 21:34:09	Trees need to be trimmed consistently and well so trees arent cut down		Valerie	Standridge			95204	/stocktonccaap/page/home
27	2026-04-27 21:32:25	I think you should plant more trees around public areas and rebuild sidewalks		Catherine	Rhett			95205	/stocktonccaap/page/home
28	2026-04-27 21:29:40	we need more beautiful trees please		Nina	Reveles			95205	/stocktonccaap/page/home
29	2026-04-27 21:28:14	I need more flowers and trees		Alicia	Hinjosa			95205	/stocktonccaap/page/home
30	2026-04-27 21:26:31	Flood spots near sidewalks!!! + drain protectants pls pls pls		John	Garza			95202	/stocktonccaap/page/home
31	2026-04-27 21:24:24	Less fossil fuels, less smoke		Kenia	Thomas			95205	/stocktonccaap/page/home
32	2026-04-27 21:23:21	Stop cutting trees.		Veronica	Li			95205	/stocktonccaap/page/home

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33	2026-04-27 21:22:11	the city should stop putting harmful gas in the air		Eli	Henderson			95205	/stocktonccaap/page/home
34	2026-04-27 21:20:59	More housing so homeless are not in the streets		Angel	Romero			95205	/stocktonccaap/page/home
35	2026-04-27 21:19:53	Government buildings should get solar panels too		Carlos	Gutierrez			95205	/stocktonccaap/page/home
36	2026-04-27 21:18:02	I think the city could help distribute more free resources, like clothes.		Eliza	Benning			95205	/stocktonccaap/page/home
37	2026-04-27 16:54:26	I wish my neighborhood had a park		Tomas	Buenrostro			95205	/stocktonccaap/page/home
38	2026-04-27 16:53:08	Better sidewalks, more trees for better air quality		Amy	Johnson			95205	/stocktonccaap/page/home
39	2026-04-24 23:18:30	5.2 the figure is showing ABAU projections, correct? I could've used another line confirming that, and stating that the plan should lead to lower levels of all those co pollutants as well (presumably)	ben@jex.zone	Benjamin	Jex		1001 W Swain Rd, Apt 54	95207	/stocktonccaap/page/Co-pollutantinventoryprojectio
40	2026-04-24 19:50:17	More park and green space. Convert S.J. counties purchase of Oak Moore into a county park.	blairhake@hotmail.com	Blair	Hake			95219	/stocktonccaap/page/home
41	2026-04-24 19:47:55	City or county wide plans need centralized hubs of info/ info distribution. Can elected put out info to increase public level participation?	alexlima@tpl.org	Alex	Lima			95209	/stocktonccaap/page/home
42	2026-04-23 16:10:29	3.1 "Table 7Table" looks like a typo	ben@jex.zone	Benjamin	Jex		1001 W Swain Rd, Apt 54	95207	/stocktonccaap/page/GHGinventoryandpr
43	2026-04-22 23:46:26	"examples in Table 2Table below" seems to include a typo	ben@jex.zone	Benjamin	Jex		1001 W Swain Rd, Apt 54	95207	/stocktonccaap/page/introduction
44	2026-04-22 23:20:48	The "GHG Inventory and Targets" section early on provides a gross and net tonnage number as to the emissions. This number is contextless, is it a lot? A little? How does it compare to other cities of similar size of similar makeup? To our historical measure? What is an understandable comparison to help conceptualize it, like you might find on The Measure of Things website?	ben@jex.zone	Benjamin	Jex		1001 W Swain Rd, Apt 54	95207	/stocktonccaap/page/executivesummary
45	2026-04-22 23:15:25	The header "CCAP Development" does not match the CCAAP used elsewhere, it's missing an A	ben@jex.zone	Benjamin	Jex		1001 W Swain Rd, Apt 54	95207	/stocktonccaap/page/executivesummary
46	2026-04-21 23:10:08	There should be an ordinance where if city removes one tree it should be replaced with 2		Patty	Crow			95206	/stocktonccaap/page/home

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47	2026-04-21 17:37:29	Bike networks would benefit our students incredibly.		Ava	G			95204	/stocktonccaap/page/home
48	2026-04-21 17:36:50	We desperately need community gardens!!!! As much as each community has a swimming pool we should have a garden too!		Desiree	B			95203	/stocktonccaap/page/home
49	2026-04-21 17:35:44	Having visual bike networks would be great. Parks could also benefit from an online visual map that list out tree plantings and volunteer opportunities		Mario	E			95205	/stocktonccaap/page/home
50	2026-04-21 17:35:02	1. street maintenance- especially south side 2. tree planting 3. helping homeless	dm69espinoza@gmail.com	Diane	Espinoza			95206	/stocktonccaap/page/home
51	2026-04-21 17:33:58	We need more proper tree trimming services and healthy pruning efforts that are available and affordable to our communities.		Melina	Casillas			95205	/stocktonccaap/page/home
52	2026-04-21 17:32:41	I think the city should focus on AD4 and AD7 climate actions because AD4 will ensure that emergency response to climate hazards are accessible to all communities of Stockton. AD7 will support our most vulnerable, houseless communities, by providing shade and coverage for them until longterm solutions are built and provided for them.		Rose	Sun			95209	/stocktonccaap/page/home
53	2026-04-21 17:32:01	people should learn proper trash discipline, no trash in street & anywhere, just learn to keep your any trash and throw it properly. Helps environment, mental health to everybody. Love your neighbor		Brigida	Hyder			95204	/stocktonccaap/page/home
54	2026-04-21 17:30:22	I think this plan is really good for the community and could help tons of people become educated and healthy.		Genesis	m			95202	/stocktonccaap/page/home
55	2026-04-21 17:29:17	Severely need to get all sidewalks repaired for us people in wheelchairs and people needing to walk.		Julie	Kelso			95203	/stocktonccaap/page/home
56	2026-04-21 17:27:59	Electric Public Transportation solar panel installation recycled water	deniselee2013@yahoo.com	Denise	Lee			95203	/stocktonccaap/page/home

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57	2026-04-21 17:26:49	T4 School bus program- Students don't feel safe on the bus T5 T8 Rail service (light Rail) T9 Infill of downtown Properties S1 Tree Planting. (need more!!!)		Hector	Calderon			95204	/stocktonccaap/page/home
58	2026-04-21 17:24:45	Tree planting- plantacion de arboles promoting more ways to be more active and have less contamination. more programs about education on waste and conservation.	flameworke@aol.com	Mari	Gonzalez			95203	/stocktonccaap/page/home
59	2026-04-21 17:24:34	The big bike lane on California st is not well organized.		Tina	Perez			95206	/stocktonccaap/page/home
60	2026-04-21 17:23:41	Side walks need to be fixed		Surinder	Biring			95205	/stocktonccaap/page/home
61	2026-04-21 17:22:57	T1 Improve Pedestrian Network - Bike Networks!		Manuel	Ramos			95203	/stocktonccaap/page/home
62	2026-04-21 17:21:55	I would love to see more dogs parks in Southside Stockton		Keley	R			95206	/stocktonccaap/page/home
63	2026-04-21 17:16:22	Park Street(527 W Park) Speed Bumps! Slow down & fence around children's park!		Janet	Rimsey			95203	/stocktonccaap/page/home
64	2026-04-21 17:12:28	We need more bees & bee education. They are on the endangered species list.	anuit2024@gmail.com	Anuit	AlRahar			95203	/stocktonccaap/page/home
65	2026-04-21 16:02:41	Mi hija va a la escuela Van Buren Elementary school, y en la escuela, en la parte de atras, tienen mucho espacio para plantar arboles y la escuela ocupa la ayuda de ustedes para plantar los arboles. Es para el bienestar de los niños. Gracias		Sandra	Pablo			95206	/stocktonccaap/page/home
66	2026-04-21 15:58:25	Queremos arboles en la escuelas para que se vean mejor las escuelas		Andrea	Carlos			95206	/stocktonccaap/page/home
67	2026-04-21 15:56:51	reforestation de escuela en areas no verde		Marta	Alcatraz			95206	/stocktonccaap/page/home
68	2026-04-21 15:53:58	La escuela Van Buren necesita arboles en la parte trasera. Gracias.		Adilene	Guzman			95206	/stocktonccaap/page/home
69	2026-04-21 15:52:23	La escuela Van Buren necesita arboles en la parte trasera de la escuela. Ojala puedan tomar en cuenta nuestra necesidad, pues los arboles son muy importantes para muchas cosas. Gracias por su atención.		Maria	Del Barrio			95206	/stocktonccaap/page/home

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70	2026-04-09 23:15:00	In the Acknowledgement Section of this plan, a photo of a bridge is included. This bridge is not located in Stockton, CA. It appears that the bridge is located in Stockton, England.	Anson.Lihosit@stocktonca.gov	Anson	Lihosit	City of Stockton	501 W. Weber Avenue, Building 2, Stockton, CA	95202	/stocktonccaap/page/acknowledgment
71	2026-04-09 22:21:20	Better visuals such as maps. Maybe interactive maps where one can put in their zip code and see how their neighborhood fares. Maybe even connect them to future projections of possible outcomes. It would give actions more power. This would help connect this Plan to something closer to the community resident. Realize how important this work is.	jfllorez209@gmail.com	Jennifer	Flores			95206	/stocktonccaap/page/Definitions
72	2026-04-09 01:32:52	Due to time constraints and availability being a barrier for communities members to get involved, create workshops that focus on a specific sector/chapter of the work plan. The plan contains a lot of action items, but if you target each sector in a single workshop, folks who are highly involved or passionate about it can get involved.		Community	Member			95219	/stocktonccaap/page/home
73	2026-04-09 01:31:24	Great displays of boards and brochures to layout the work that's been done. Great breakdown of so many mitigation actions. It does seem people are prioritizing safety, assisting with transportation, making the city more walkable and really emphasizing seeing more greenery. More plants, more sidewalks, more free buses!		Estefany	Nunez			95203	/stocktonccaap/page/home
74	2026-04-09 00:30:29	I am an Urban Forester, and more trees in the ground in redlined communities can combat heat island effect and heal trauma within those communities. Also need more vegetative barriers to line our freeways with to also combat pollution! I'm a former Stockton resident and it feels great to do this work in my OG hometown and I love the fact that there are people here that want change!	alexander@littlemanila.org	Alexander	Flores			95336	/stocktonccaap/page/home
75	2026-04-09 00:00:28	1. Get the big rig/trailers traffic out of So Stan District 6 area 2. Reroute air flight routes		Pat	Barrett			95206	/stocktonccaap/page/home
76	2026-04-08 23:59:07	Immediate actions; (Hits all "T" marks) - Find busiest roads for/near schools / every MAJOR RD (IE West Ln/Harding) Take one whole lane * paint red/green for bus/bike/emergency only - Dirty Ports / change @ grade crossings		Garrett	D			95205	/stocktonccaap/page/home

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77	2026-04-08 23:57:14	Great job everyone!		M	D			95202	/stocktonccaap/page/home
78	2026-04-08 23:55:31	* I would like to see the immediate development of: a network of bicycle paths to link Stockton & other nearby cities - because the landscape is so flat, riding a bicycle over a distance is accomplishable. * Development of more green belts & promotion of green belts that already exist. * Efficient public lighting to allow for safe bicycle commuting after sundown. * Drinking water fountains along the bicycle path	tiffany@littlemanila.org	Tiffany	Pech			95205	/stocktonccaap/page/home
79	2026-04-08 23:53:15	Integrate CCAAP actions into Community Benefit Agreement (CBA) Frameworks via ordinances. Helps to realign incentives to enable micro-improvements to occur (e.g. tree planting/green space) at new developments	jpeterston632@ucla.edu	Jordan	Peterson			95204	/stocktonccaap/page/home
80	2026-04-08 23:51:51	Mary Elizabeth says climate change is now! Photosynthesis Power Not posted will find link tree Monday the plan will be posted		Mary	Elizabeth			95202	/stocktonccaap/page/home
81	2026-03-28 00:45:24	We all can benefit from more trees in our city provided they have continued maintenance! Thank you.	mothersister209@gmail.com	Tausha	Rodgers			95206	/stocktonccaap/page/home
82	2026-03-24 20:34:47	I'm not sure if this was intentional, but I don't believe this is a picture of Stockton, CA. Stockton doesn't have bridges like this.		Oluchi	Njoku			95202	/stocktonccaap/page/acknowledgment
83	2026-04-29 00:00:00	Comments from the Sierra Club (14 pgs)	parfrey@sbcglobal.net	Eric	Parfre				
84	2026-04-30 00:00:00	Comments from Mary Elizabeth (17 pgs)	mabeth@outlook.com	Mary	Elizabeth				
85	2026-05-01 00:00:00	Comments from Restore the Delta (4 pgs.)	davis@restorethedelta.org	Davis	Zapata			95204	
86	2026-05-04 00:00:00	Comments from San Joaquin Council of Governments (3 pgs.)	tran@sjcog.org	Christine	Tran			95202	
87	2026-05-11 00:00:00	Comments from Working Class Unity (5 pgs.)	peterhawley07@gmail.com	Peter	Hawley				



April 29, 2026

Via email to climateaction@stocktonca.gov and shalilah.bess@stocktonca.gov

Re: Comments on Draft Stockton MSA Comprehensive Climate Action and Adaptation Plan
Stockton Climate Action Plan Advisory Committee:

The Sierra Club submits the following comments on the Comments on the Draft Stockton MSA Comprehensive Climate Action and Adaptation Plan (“CCAAP”).

The Current Draft of the CCAAP is a Vague and Unenforceable Plan That is a Waste of Taxpayer Money

The CCAAP is a hybrid document that attempts vainly to set policies and action programs for all of the jurisdictions in San Joaquin County (eight cities and the unincorporated area). But the plan preparation and implementation appear to be driven almost entirely by the City of Stockton, with apparently little coordination with the other jurisdictions. This is a major problem and the lack of inter-governmental coordination results in plan policies and programs that are vague, unenforceable, and seem to be watered down so that they are not objectionable to any city (see examples below). The voluntary, unquantified policies do not comply with State laws and guidelines (see below).

As an example of a climate action plan that is written in a much more coherent and enforceable manner, we have included excerpts from the City of Sacramento’s plan. While it is not perfect, the individual policies in the Sacramento plan are written to be measurable and enforceable, in stark contrast to the mush in the draft CCAAP.

Unfortunately, the requirement by the State that this Stockton plan is to include the entire Stockton Metropolitan Statistical Area (MSA), which is all of San Joaquin County, is a recipe for spending hundreds of thousands of taxpayer dollars on a plan that is rather meaningless for everyone and will make no meaningful local contribution to reducing greenhouse gases (GHG) and VMT (vehicle miles traveled).

The City’s Web site on the CCAAP notes this hybrid function of the plan which involve conflicting goals. It states:

The comprehensive update will develop a plan to help Stockton, unincorporated San Joaquin County, and other cities in the county to reduce greenhouse gas (GHG) emissions in the short-term and long-term. The plan will also develop strategies to protect Stockton communities and businesses from the impacts of climate change, such as extreme heat, flooding, and wildfire smoke. *The objective of the City of Stockton's Comprehensive Climate Action & Adaptation Plan is to provide a strategic framework for the City to pursue meaningful projects & policies to advance the environment of Stockton and beyond.*

...Due to the grant funding structure, the Stockton Climate Action Plan will evaluate greenhouse gas (GHG) emissions data across the MSA with emphasis on the City of Stockton to develop a GHG inventory baseline of 2022...The climate vulnerability assessment will focus on the City of Stockton. [emphasis added]

The end result is a draft plan based upon vague, mushy policies and programs that cannot be quantified and enforced. By the end of the plan, Chapter 11 includes the following vague description of where it goes from here:

The CCAAP is the first step to enabling effective and equitable climate action in the region. *As an immediate next step, the Stockton MSA will engage community members to help select priority CCAAP climate actions for implementation.* The CCAAP team will then develop action implementation roadmaps for those prioritized actions in order to kick-start implementation. *Following adoption of the CCAAP, the Stockton MSA will continue to coordinate with regional entities to oversee implementation, align departmental and regional efforts, pursue funding opportunities, and monitor progress against performance indicators.* [emphasis added]

Where is the Documentation of Coordination with Other Jurisdictions in the County?

Given the severe constraints set by the State in funding this effort (forcing the City of Stockton to plan for the entire county) it is not surprising that this draft plan largely punts the crucial issue of how to coordinate among all the nine jurisdictions to a future date. No doubt the consultant will wait for the next installment of State funding to get to the real meat of the effort sometime next year or the year after.

Section 2.7 Intergovernmental Coordination in the plan addresses this deferral of responsibility to a later date (and contract):

The CCAAP is written from the perspective of local governments (e.g., city and county governments) acting as the lead climate action implementers in close partnership with residents, businesses, and other stakeholders. *Significant coordination between local governments is needed to integrate CCAAP development with other planning efforts and to*

build an effective coalition for implementation. Regional governing bodies met during the CCAAP development to review climate actions, align priorities, discuss implementation challenges, and share updates on ongoing programs and initiatives. [emphasis added]

The plan text notes that “Beyond the engagement events previously mentioned, 16 interviews were conducted with various departments of the following entities to inform CCAAP development,” including the Cities of Stockton Lodi, Manteca, and Tracy, plus the San Joaquin Council of Governments (SJCOG) and the Workforce Development Board.

Where is the documentation of what was discussed (and decided?) at these meetings? Some notes must have been taken and these should be shared as an appendix attached to the draft plan.

Two additional questions for the staff and consultants:

Has this draft plan been sent to the other seven cities and the County with a request that all the jurisdictions review the contents by a certain date?

Does the staff and consultant team intend to go out to each City Council and the County Board of Supervisors to make a presentation on the draft plan and ask that the jurisdictions approve the plan in concept? If not, why not?

The CCAAP Must Comply with State General Plan, CEQA, and CARB Guidelines

Numerous State laws and guidelines dictate the content of Climate Action Plans adopted by local agencies. The current draft of CCAAP fails to mention any of this important legal and administrative context. It is unclear how this plan is intended to be used by the adopting agencies.

The draft should be revised to acknowledge the State laws summarized below and explicitly note whether the draft plan is consistent, or not, with this State guidance. The consultant should also inform the citizens advisory committee of the applicability of these laws and guidelines, if they have not already done so. As currently written, the CCAAP does not fully comply with these State standards.

Is the Draft CCAAP Intended to be Used as a “CEQA Compliant” Document?

The draft CCAAP must be amended to state whether this adopted plan is intended to be used as a “CEQA Compliant” document. This is an important point to clarify since the required contents for a climate action plan outlined under the California Environmental Quality Act (CEQA) are quite specific.

A major incentive for local cities and counties to prepare and adopt a climate action plan is that the document can be used to streamline CEQA analysis for subsequent development projects

that are consistent with the approved CAP. This is what is considered a CAP that is “CEQA Compliant.”

Section 15183.5 of the CEQA Guidelines (Tiering and Streamlining the Analysis of Greenhouse Gas Emissions) state:

(a) Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.”

However, to qualify as a “CEQA Compliant” climate action plan, the State CEQA Guidelines require very specific content to be adopted in a CAP, including:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan’s progress toward achieving the level and to require amendment if the plan is not achieving specified levels; [emphasis added]

As currently written, the policies and action programs in the draft CCAAP are not consistent with these requirements since the proposed plan does not “Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions,” nor does it “Specify measures or a group of measures, *including performance standards*, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level, nor does the plan “Establish a mechanism to monitor the plan’s progress toward achieving the level and to require amendment” if necessary.

The Draft CCAAP is Not Consistent with State CARB Guidelines

The California Air Resources Board (CARB) is the most important State agency that oversees compliance with air quality and GHG emissions. The 2022 Scoping Plan adopted by CARB is perhaps the most critical document to measure the effectiveness of local agency plans to curb air pollution and related climate actions.

The 2022 Scoping Plan includes a very helpful, and insightful, Appendix D Local Actions.¹ The appendix states that:

“Whether or not a jurisdiction adopts any type of CAP, local governments have tremendous opportunity to reduce GHGs in these three strategy areas:

1. Transportation electrification
2. VMT reduction
3. Building decarbonization

“By prioritizing climate action in these areas, local governments will be addressing the largest sources of emissions under their authority and meaningfully tackling climate change, as well as aligning with State climate goals and protecting public health and welfare. In order to support local governments in taking action in these areas, CARB staff has developed a list of the most impactful strategies (summarized in Table 1). The strategies on this list are not one-size-fits-all, nor are they the only strategies that local governments can adopt, but they represent the core strategies that most jurisdictions in California can adopt and implement to 12 Cal. Code of Regs., tit. 14, §§ 15183.5. "Tiering and Streamlining the Analysis of Greenhouse Gas Emissions." (p. 11)

The “most impactful strategies” identified by CARB include:

- Convert local government fleets to zero-emission vehicles (ZEV)
- Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as permit streamlining, infrastructure siting, consumer education, or preferential parking policies)
- Reduce or eliminate minimum parking standards in new developments
- Adopt and implement Complete Streets policies and investments, consistent with general plan circulation element requirements
- Increase public access to shared clean mobility options (such as planning for and investing in electric shuttles, bike share, car share, transit)
- Implement parking pricing or transportation demand management pricing strategies

¹ CARB Draft 2022 Scoping Plan (May, 2022), App. APPENDIX D LOCAL ACTIONS.
See https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf

- Amend zoning or development codes to enable mixed-use, walkable, and compact infill development (such as increasing allowable density of the neighborhood)
- Preserve natural and working lands
- Adopt all-electric new construction reach codes
- Adopt policies and incentive programs to implement energy efficiency retrofits (such as weatherization, lighting upgrades, replacing energy intensive appliances and equipment with more efficient systems, etc.)
- Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings
- Adopt policies and incentive programs to reduce electrical loads from equipment plugged into outlets (such as purchasing Energy Star equipment for municipal buildings, occupancy sensors, smart power strips, equipment controllers, etc.)
- Facilitate deployment of renewable energy production and distribution and energy storage (p. 4-5)

The CARB Appendix goes on to advise that:

“Across the variety of plans, the elements that make for a strong mitigation strategy include:

- a preponderance of mandatory vs. voluntary measures, particularly for measures addressing new development;
- measures that address the largest GHG emission sources;
- a focus on quality (measures likely to reduce large amounts of emissions) over quantity (many measures with small impact);
- a minimal reliance on offsets, if any, with preference for those that achieve local benefits;
- transparency in methods of quantification (assumptions and their bases, emission factors, etc.);
- and a strong implementation and monitoring strategy.

“There is no magic number or percentage of mandatory measures required in a plan to support streamlining under CEQA. Again, it is the ability of the mitigation strategy to clearly meet the GHG reduction target(s) that is considered in the plan’s ability to support streamlining. This is where addressing the largest sources of GHG emissions and focusing on quality (e.g., achieve significant emissions reductions) over quantity can be helpful.

“For example, a plan that ignores, or lightly treats, transportation emissions may have a hard time making the case that it is consistent with the State’s carbon neutrality target.”

(page C-12)

Another helpful guide to crafting effective climate policies is found in the CEQA Guidelines adopted by the Bay Area Air Quality Management District (BAAQMD).²

The Air District recommends that four design elements be included in GHG reduction plans as important measures to address GHG emissions from new development and, to the extent appropriate, existing development. These design elements are:

1. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
2. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. [Appendix F to the State CEQA Guidelines summarizes the goal of this measure as the wise and efficient use of energy, achieved through: (1) decreasing overall per capita energy consumption, (2) decreasing reliance on fossil fuels, and (3) increasing reliance on renewable energy sources.
3. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the Draft 2022 Scoping Plan Update (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target:
 - i. Residential projects: 15 percent below the existing VMT per capita
 - ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
4. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

Because of the importance of these four measures in supporting the statewide GHG reduction targets, in addition to including these measures in the plan, Air District staff strongly recommend that the implementation strategy for the plan call for their adoption/implementation as soon as possible. (page C-13-14).

All of the above policies and implementation strategies should be considered for inclusion in the draft CCAAP.

² BAAQMD CEQA Guidelines (2022), Appendix C Guidance for GHG Reduction Strategies. See https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-c-ghg-reduction-strategies_final_edits-for-ascent-pdf.pdf?rev=8e5bb7d8ad504dd6accd3c04e58bdf87&sc_lang=en

An Example of Meaningful Policies in a Climate Plan That Can be Measured and Implemented

There are dozens of examples of effective climate action plans that have been adopted by jurisdictions up and down the State of California.

Taking just one local example should suffice to illustrate our criticism of this flawed CCAAP and how to move forward, the City of Sacramento adopted their Climate Action & Adaptation Plan in February 2024.³

The plan's GHG Reduction Potential by Sector and Measure includes the following measures:

E-1 Support SMUD as it implements the 2030 Zero Carbon Plan

E-2 Eliminate natural gas in new construction

E-3 Transition natural gas in existing buildings to carbon-free electricity by 2045

E-4 Increase the amount of electricity produced from local resources and work with SMUD to install additional local storage by 2030

E-5 Support infill growth with the goal that 90% of new growth is in the established and center/corridor communities and 90% small-lot and attached homes by 2040, consistent with the regional Sustainable Communities Strategy. Project-level VMT should be 15% below (or 85% of) the regional average.

TR-1 Improve active transportation infrastructure to achieve 6% active transportation mode share by 2030 and 12% by 2045

TR-2 Support public transit improvements to achieve 11% public transit mode share by 2030 and maintain through 2045

TR-3 Achieve zero-emission vehicle (ZEV) adoption rates of 28% for passenger vehicles and 22% for commercial vehicles by 2030 and 100% for all vehicles by 2045

Waste

W-1 Work to reduce organic waste disposal 75% below 2014 levels by 2025

WW-1 Reduce water utility emissions (in MT CO₂e per million gallon delivered) by 100% by 2030 and maintain that through 2045

WW-2 Reduce wastewater emissions by 22% by 2030 and 40% by 2045

³ City of Sacramento Climate Action & Adaptation Plan (February 2024). See: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Long-Range/Climate-Action-Plan/18-06051_Sac%20CAAP_Digital%20-%20Final%20Adopted%20FEB272024.pdf

Carbon Sequestration

CS-1 Increase urban tree canopy cover to 25% by 2030 and 35% by 2045.

Proposed Edits to Vague and Unenforceable Policies in the Draft CCAAP

Based on the above recommendations from State agencies for developing effective and measurable climate policies, and taking the Sacramento plan as a good local example, Sierra Club proposes the following specific edits to the following draft CCAAP policies. Our proposed edits are highlighted in ~~bold strikethrough~~ (for deleted text) and **bold underline** (for added text). Our notes are included in brackets [].

We have reordered the draft CCAAP policies to correspond with the CARB instruction that “local governments have tremendous opportunity to reduce GHGs in these three strategy areas: 1. Transportation electrification; 2. VMT reduction; and 3. Building decarbonization.”

VMT/GHG REDUCTION

E-5 S The jurisdictions shall support infill growth **with the goal that 50% of new growth is within the established urban communities and new growth densities shall reach at least 55% multi-family (small-lot and attached homes) by 2040, consistent with the regional San Joaquin Council of Governments Sustainable Communities Strategy. Project-level VMT should be 15% below (or 85% of) the regional average.** [from Sacramento CAP]

~~T9 — Incentivize infill development~~

T10 Establish Transit-Oriented Development (TOD) overlay zones. **Amend zoning or development codes to enable mixed-use, walkable, and compact infill development (such as increasing allowable density of the neighborhood)** [CARB recommendation]

T13 Incorporate Transportation Demand Management (TDM) elements in plan review process **by 2035 by requiring all jurisdictions to adopt and apply a standard list of TDM requirements on all approved development projects over a certain size**

Implement parking pricing or transportation demand management pricing strategies [CARB recommendation]

The jurisdictions shall adopt zoning ordinances that reduce or eliminate minimum parking standards in new developments by 2035 [CARB recommendation]

The jurisdictions shall adopt zoning ordinances that by 2035 adopt and implement Complete Streets policies and investments, consistent with general plan circulation element requirements [CARB recommendation]

The jurisdictions shall adopt ordinances that by 2035 increase public access to shared clean mobility options (such as planning for and investing in electric shuttles, bike share, car share, transit) [CARB recommendation]

TR-1 Improve active transportation infrastructure to achieve 6% active transportation mode share by 2030 and 12% by 2045 [from Sacramento CAP]

TR-2 **The jurisdictions shall support funding through San Joaquin Council of Governments and other sources to improve transit service and frequency through public transit improvements to achieve % public transit mode share by 2035 and maintain through 2045** [from Sacramento CAP]

T1 Expand and improve pedestrian network [where and by when?]

T2 Expand bike networks and facilities [where and by when?]

T3 Develop and implement Safe Routes to School Plans [where and by when?]

T4 Support school bus program [where and by when?]

T6 Provide transit passes and incentives [for who?]

T7 Expand carpool/vanpool and carshare programs

T8 Support rail expansion [where and by when?]

T11 Improve traffic signaling [where and by when?]

TRANSPORTATION ELECTRIFICATION

T14 Convert ~~local government~~ **all municipal and County** fleets, **including on-road and off-road equipment for municipal operations**, to ~~cleaner fuels~~ zero-emission vehicles (ZEV) **by 2035** [CARB recommendation]

~~OR3—Use cleaner fuel off-road equipment for municipal operations~~

TR-3 **The jurisdictions shall adopt plans and programs that achieve zero-emission vehicle (ZEV) adoption rates of % for passenger vehicles and % for commercial vehicles by 2030 and 100% for all vehicles by 2045** [from Sacramento CAP]

Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as permit streamlining, infrastructure siting, consumer education, or preferential parking policies) [CARB recommendation]

T15 **Encourage and support plans by the San Joaquin Regional Transit District to convert their fleet to cleaner fuels all-electric buses by 2035.**

OR2 **The jurisdictions shall by 2035 develop plans and programs that require cleaner fuel ZEV on-road and off-road equipment for all new approved development projects.**

T18 ~~Develop warehouse freight truck clean fuel requirements in new projects~~

All jurisdictions within the Stockton MSA shall by 2035 adopt Warehouse Ordinances that address the need to mitigate the air quality, GHG, noise and other impacts from newly approved large warehouse/logistics/data center projects (projects over 100,000 square feet in size). The ordinances shall include specific requirements included in recently negotiated settlement agreements by the Sierra Club.⁴ [Sierra Club recommendation based on recently negotiated pre-litigation settlement agreements for the Mariposa and Costco projects in South Stockton and Tracy, as well as others in California]

T16 Provide public EV chargers [where?]

T17 Develop a regional clean freight Transportation Plan [this sounds like a SJCOG responsibility]

T19 Install **clean “green” or “blue”** hydrogen fueling infrastructure

T20 Support development of a Stockton Airport Sustainability Plan [more detail needed here]

T21 Support the implementation of the Port of Stockton Clean Air Action Plan [the Port is not part of this plan is it?]

BUILDING DECARBONIZATION

All jurisdictions within the Stockton MSA shall contract with AVA Community Energy by 2030 to opt in to provide clean green energy for all residents and businesses, and city and County

⁴ The Warehouse Ordinances shall require that the approved large warehouse project include specific conditions of approval that ensure all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations and that the project shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by 2030, or when commercially available for the intended application, whichever date is later. The Warehouse Ordinance shall require that newly approved large warehouses shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) at the start of business operations. The Warehouse Ordinances shall require that large warehouse projects be required to provide electric charging facilities on the project site sufficient to charge all electric trucks domiciled on the site and all heavy duty, medium and light duty trucks that use the project site. Sufficient EV charging stations shall also be provided for employee electric vehicles, as well as electric bikes, scooters, and other electric non-auto vehicles used by employees to commute to the site.

building operations and fleets. [Currently, the cities of Tracy, Lathrop, and Stockton have joined AVA and the unincorporated County area will be served by AVA beginning in May 2026.]

The jurisdictions within the MSA shall develop incentive programs by 2030 to encourage and assist all existing businesses and residents to choose the AVA “clean energy” option.

Incentives could include direct subsidies by the cities, County, and other State agencies to assist low income households to pay AVA clean energy bills.

All new development projects approved by the nine jurisdictions shall be required to provide energy for their projects with AVA clean power as a condition of approval.

BE1 Upgrade public outdoor lighting

BE2 Promote existing incentives for energy-efficient and electric building equipment

EG1 Install solar panels on local government properties **by 2035.**

EG2 **All jurisdictions within the Stockton MSA shall ~~Promote~~ require the installation of solar installations panels on all newly approved single- and multi-family residential units, as required by the State Building Code (CAIGREEN).**

All jurisdictions within the Stockton MSA shall adopt ordinances by 2035 to require the installation of solar panels on all newly approved large industrial and commercial projects (over 100,000 square feet in size).⁵

E-2 Eliminate the use of natural gas in new construction [from Sacramento CAP] **and adopt all-electric new construction reach codes**⁶ [CARB recommendation]

E-3 Transition the use of natural gas in existing buildings to carbon-free electricity by 2045
[from Sacramento CAP]

Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings [CARB recommendation]

Adopt policies and incentive programs to implement energy efficiency retrofits (such as weatherization, lighting upgrades, replacing energy intensive appliances and equipment with more efficient systems, etc.) [CARB recommendation]

⁵ Consistent with recent Sierra Club settlement agreements, the project shall include sufficient solar panels on the roofs of the project’s building or in the parking lot to provide power for the operation’s base power use at the start of operations and as base power use demand increases. To be clear, enough solar panels to power each individual building must be constructed at the same time the building is finished, and in operation prior to the first occupancy permit issued by the jurisdiction.

⁶ “Reach” codes are energy efficiency building regulations adopted by local agencies, consistent with the State Building Code.

Adopt policies and incentive programs to reduce electrical loads from equipment plugged into outlets (such as purchasing Energy Star equipment for municipal buildings, occupancy sensors, smart power strips, equipment controllers, etc.) [CARB recommendation]

Facilitate deployment of renewable energy production and distribution and energy storage [CARB recommendation]

Conclusions of the Draft CCAAP

Key findings from the CCAAP's 2022 GHG inventory include:

- Most of the region's emissions are from the Transportation (51%), Agriculture (25%), and Residential Energy (12%) sectors, which together generate roughly 88% of total emissions.
- In the Transportation sector, on-road fuel consumption from passenger vehicles and freight trucks is the largest contributor to emissions, accounting for nearly 80% of the sector's total GHG emissions and 40% of the region-wide emissions. The remaining emissions in the Transportation sector are from rail, aviation, watercraft, and off-road equipment.
- Agricultural emissions are mainly from livestock, accounting for nearly 97% of the sector's total GHG emissions.
- Residential Energy emissions are mainly from natural gas use, accounting for nearly 80% of the sector's total GHG emissions.

The draft plan notes that as written the plan will not meet State mandated GHG emissions targets for 2030 or 2045. The text states:

Compared to 2022 gross emissions levels, the CCAAP Action Implementation Scenario could achieve a 12% reduction in gross emissions by 2030 and a 40% reduction by 2045...This means the current CCAAP actions alone will most likely not achieve the targets of reducing emissions 39% below 2022 levels by 2030 and 82% below 2022 levels by 2045, and achieving carbon neutrality by 2045. This is not unexpected as the CCAAP Action Implementation scenario only represents 38 current action priorities and is not a comprehensive list of all actions necessary to meet the targets. Additionally, this outcome is common in local and regional climate action planning, as most major emission sources fall partly or entirely outside the control of local or regional governing bodies. Therefore, meeting the ambitious targets requires additional action from regional, State, and/or federal partners..." (Section 7.8.1)

This iteration of the CCAAP is basically saying local governments cannot make a difference and that we have to rely on regional, State, and federal partners to meet our goals for reducing GHG.

Rather than throwing up our hands and in essence acting as if we can do nothing at the local level, this climate plan for San Joaquin County must do a better job in protecting our residents and businesses.

We have offered very detailed and significant edits to the vague policies in the draft plan in an effort to strengthen GHG reduction policies. We expect and will demand that the staff and consultant incorporate these edited policies and programs into the next draft of this plan and recalculate the emissions reductions.

If you should have any questions about these comments, you may contact Eric Parfrey at parfrey@sbcglobal.net or (209) 641-3380.

Sincerely,

s/s Margo Praus, Chair
Eric Parfrey, member
Delta-Sierra Group, Sierra Club

cc: Stockton City Council
Stockton Planning Commission
City Councils of Lodi, Lathrop, Manteca, Tracy, Escalon, Mountain House, Ripon
California Air Resources Board
California Dept. of Housing and Community Development
California Attorney General
Aaron Isherwood, Sierra Club Environmental Law Program

Stockton Environmental Justice Education and Advocacy

City of Stockton Council and Mayor
City Manager Office of Environment and Sustainability
425 N El Dorado Street Stockton, CA 95202
via city.clerk@stocktonca.gov , shalilah.bess@stocktonca.gov, jasmine@littlemanila.org

4.30.2026

Re: March 2026 Draft Stockton MSA Comprehensive Climate Action and Adaptation Plan
Comments

The review of Stockton MSA Comprehensive Climate Action and Adaptation Plan might have been improved with further discussions after the Plan was available for a good period of time instead of when the Plan was first available.

Table of Contents

The Table of Contents that followed the Executive Summary included acronyms, abbreviations and definitions for various terms including some state and regional agencies. The terms “local government” and “critical facilities” were defined in the text but should be included with the other definitions.

Please include a comprehensive list of city and county departments and regional and state agencies that are referenced in the document with a website link to the relevant departments. For example, San Joaquin County Department of Public Works Solid Waste Division
<https://www.sjgov.org/department/pwk/solid-waste>

Also, with regards to the designation of various City of Stockton organizational levels, such as the (Office of) Environmental Sustainability which is not commonly referred to as a “Division” but rather as an “Office” like all the other entities under the City Manager’s Office.

Please note that the term Office of Emergency Services in the City of Stockton is within the Fire Department while the San Joaquin County Office of Emergency Services is an independent department.

1. Introduction

The key take away that the Stockton MSA is a rapidly growing region does not coincide with the heavily referenced SJCOG-UOP San Joaquin County Demographic and Employment Forecast dated February 24, 2025 that included statements regarding the slowing of growth not rapidly growing.

Like many areas in California, San Joaquin County has experienced a slowing of population growth in recent years. According to BEA's county population estimates, annual average population growth (2020-2023) was 0.9% in the 2020s. That contrasts with annual average population growth of 1.3% in the 2010s, 2.1% in the 2000s, and 1.7% in the 1990s.

Overstatements do not build trust. The Stockton MSA is a growing region is more accurate. Additionally, a separate descriptive term for growth was used, "service population growth", which was stated to have come from the February 2025 report but was not found in the text of the report. Additionally, the February 2025 report included projections for the various communities in San Joaquin County as shown below, indicating that expected growth rates for the City of Stockton are less than other areas of our County.

Table 5 – Local Area Population Adjustments

City	Initial 2025-2050 Population Growth Rate	Adjusted 2025-2050 Population Growth Rate
Escalon City	16.5%	16.5%
Lathrop City	27.3%	90.9%
Lodi City	17.0%	17.0%
Manteca City	20.8%	20.8%
Mountain House CDP	40.9%	62.0%
Ripon City	18.1%	18.1%
Stockton City	17.7%	8.8%
Tracy City	18.2%	18.2%
Unincorporated East	15.7%	12.4%
Unincorporated Northwest	16.5%	13.1%
Unincorporated Southwest	17.6%	14.2%
(Sub-Total Unincorporated)	16.6%	13.2%
County Total	18.9%	18.9%

The warming projected will also impact public health (pg 1-1).

The Stockton MSA includes the cities of Stockton, Escalon, Lodi, Lathrop, Manteca, Mountain House, Ripon and Tracy as well as unincorporated San Joaquin County. These local governing bodies are to act as the lead climate action implementors in close partnership with residents, businesses, and other regional stakeholders. Essentially the Stockton MSA encompasses the entire area of San Joaquin County. The demographic data must have been from 2022 because the same Census Reporter for 2024 ACS data indicates that there are 816,108 (<https://censusreporter.org/profiles/05000US06077-san-joaquin-county-ca/>) not 780,000 which is included in the Introduction section. Please update. Additionally, according to Quick Facts of Stockton from the Census Bureau 320,000 the population included in the report was from 2020 and the 2024 population is reported at 324,975 with some other demographic differences (<https://www.census.gov/quickfacts/fact/table/stocktoncitycalifornia/PST045224>). Please update with data whose date is clearly stated.

2. CCAAP Development Process

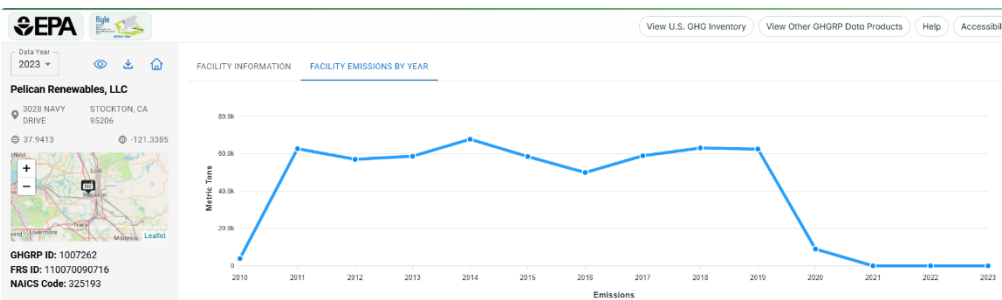
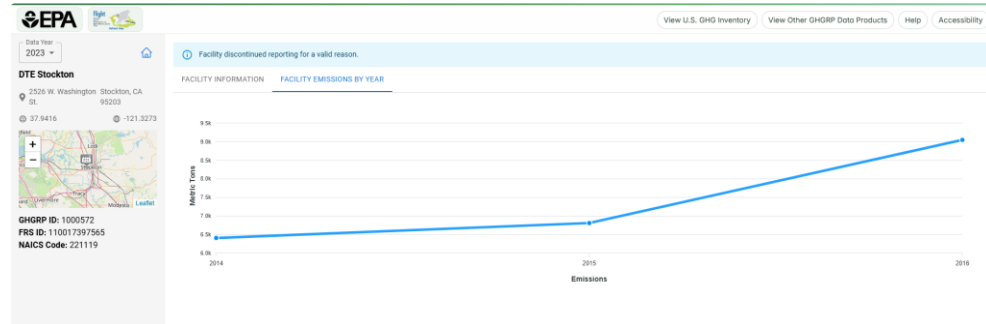
There is a need for Cities and County officials to take ownership as “These local governing bodies are to act as the lead climate action implementors in close partnership with residents, businesses, and other regional stakeholders.” Outreach and engagement cannot be left to contractors even if they are trusted community-based organizations. The Cities and County of San Joaquin must act as a partner which involves integrating reporting of progress and outreach opportunities well in advance through all mechanisms available for governmental entities to communicate with residents. The outreach and engagement with few exceptions were plagued with short notice and going forward this issue should be addressed with the expectation of at least 10 days notice for a meeting with at least 2 reminders with material available in advance of the meeting. This particular event which was the last outreach meeting to announce the availability of the draft report for review and to consider options, was very poorly attended and I only received notice of the 3.21.2026 meeting on 3.18.2026. I spread around the information, but I wonder how many on the interested party list/stakeholder list received the notice on 3.18.2026 and already had plans for Saturday morning – early afternoon. The meeting was a wonderful setting with good engagement activities and food only missing people. Even now, the City of Stockton is sending out notices multiple times to get comments on the Downtown Transportation Plan – Move Downtown beginning 4.22.2026 which did not as many people as interacted during the Stockton MSA Comprehensive Climate Action and Adaptation Plan development process. No multiple notices for the review of the Stockton MSA Comprehensive Climate Action and Adaptation Plan have occurred from City or County sources.



Having attended all of the Committee meetings, there were lots of new information that was not presented. In terms of large reports having draft chapters to review along the way would have been easier to digest and to provide substantive comments. Hear ye Hear ye.

3. Greenhouse Gas (GHG) Inventory and Projects and Appendix A

The number one stationary source of air pollutants and greenhouse gases in Stockton is the DTE Cogeneration process whose emissions have not been reported since 2016, yet Owens-Brockway Glass Container Inc greenhouse gases are reported and included – both industrial process producing products for sale. While Pelican Renewable is temporarily not producing fuel with resultant greenhouse gas emissions – it may very well be in the future.



In Tracy, CA two reporters of greenhouse gas emissions that produce products that are sold included in the inventory was from the Owens-Brockway Glass Container but not the Tracy Combined Cycle Power which also sells a product generated in San Joaquin County.



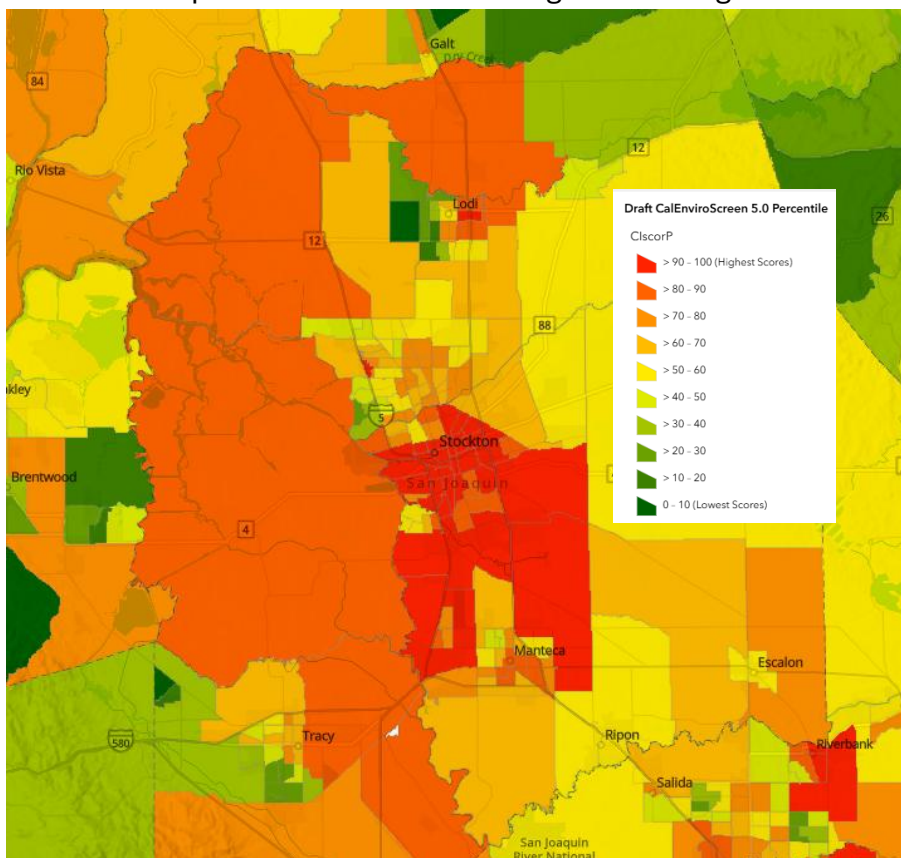
The Stockton MSA Comprehensive Climate Action and Adaptation Plan must include a list of major industrial facilities that were included in the greenhouse gas emissions inventory as well as those that were not for whatever reason. Tax revenues are obtained by the continued

operation of these facilities and the greenhouse gases that are produced as a result should not be forgotten. In fact there is an effort to reduce loopholes that allowed for some greenhouse

gas producers to be exempt from reporting. When next time a greenhouse gas inventory is prepared having the list of greenhouse gas industrial emitters and numbers used for this 2026 inventory of industrial facilities will allow for transparent discussions and considerations.

The same for the transportation related vehicle miles travelled – a breakdown of these emissions is missing in this section or in an appendix, except for some actual vehicle miles travelled for estimating greenhouse gas emission reductions NOT in the inventory. How many light duty automobiles, how many heavy duty trucks, how many rail miles and train trips, how many airplanes stopped and started at airports in San Joaquin County, and there is no discussion of Port of Stockton marine except for 29,529 metric tons equivalent related to Emissions from commercial harbor craft, ocean-going vessels, and pleasure craft assigned to San Joaquin County. No discussion of numbers of trips, types of ships, and time berthed which affects the amount of greenhouse gases and co-pollutants emitted in San Joaquin County that impact public health and the environment.

A description of the emission inventory was requested several times in public meetings during the draft Stockton MSA Comprehensive Climate Action and Adaptation Plan development. This draft Plan does not disclose the data behind the estimated emission in the 5-page appendix nor in the text of the draft Plan. Additionally, the basis for assigning emissions to the City of Stockton inventory was not disclosed. Full accounting of emissions is needed to assess the impacts of land use planning decisions on public health and the environment and to characterize impacts related to clean air investments to reduce greenhouse gases and associated co-pollutants. We know that greenhouse gas emissions do not just warm the



environment but carry co-pollutants that harm health and wellness of residents in San Joaquin County. The newest version of CalEnviro Screen 5.0 draft includes small stationary sources like gasoline stations which are regulated to contain vapors during dispensing, but it is not uncommon to smell fuel. There is no discussion about the effects of enforcement on reducing process related fugitive emissions of greenhouse gases and co-pollutants above permitted levels.

The issue of unaccounted greenhouse gas emissions was aptly described in Leehi Yona’s article [Democracy in the Air: Uncounted Emissions, Discounted Communities Accounting](https://publications.lawschool.cornell.edu/jlpp/wp-content/uploads/sites/3/2026/01/Yona-final.pdf) published in the Cornell Journal of Law and Public Policy Volume 32 Number 3 (Symposium) Spring 2025 ([Democracy in the Air https://publications.lawschool.cornell.edu/jlpp/wp-content/uploads/sites/3/2026/01/Yona-final.pdf](https://publications.lawschool.cornell.edu/jlpp/wp-content/uploads/sites/3/2026/01/Yona-final.pdf))

“Accounting for unaccounted for GHGs would help regulate industries that cause environmental harm through both local air pollution and locally felt, outsized climate impacts on communities. When “unaccounted-for GHG industries” are located near marginalized communities, their environmental justice impacts are thus twofold: one local and acute, the other global and with persistent long-term consequences.”

The description of the greenhouse gas emission sources must be included in the Final plan with actual numbers and lists of emission sources.

4. GHG Reduction Targets

The statement in the Draft Stockton MSA Comprehensive Climate Action Plan (below) characterizing the California 2022 Scoping Plan is false:

Draft Stockton MSA Comprehensive Climate Action Plan

“Conventional CDR methods (i.e., those that are well established, widely reported, and deployed at scale) include afforestation and reforestation, forest management, peatland and coastal wetland restoration, and soil carbon sequestration. Novel CDR methods include ocean fertilization, direct air carbon capture and storage, bioenergy with carbon capture and storage, biochar application, ocean alkalinity enhancement, and enhanced rock weathering. The California 2022 Scoping Plan focuses on CDR methods such as direct air carbon capture and storage, bioenergy with carbon capture and storage, and natural and working lands (NWL) management. However, the 2022 Scoping Plan notes that the state’s NWL sector will likely be a net source of emissions in the coming decade, so other forms of mechanical CDR such as direct air capture will be needed to meet the state’s carbon neutral target.”

The 2022 California Scoping Plan does not include language stating that the focus of the plan is direct air carbon capture and storage, bioenergy with carbon capture and storage but does include natural and working lands management.

The Executive Summary of the California Air Resources Board 2022 Scoping Plan ([2022 Scoping Plan Update](https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf) https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf) mentions direct air capture and research needs. This is the focus of the California Air Resources Board 2022 Scoping Plan: “Focuses on strategies for reducing California’s dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.” Direct air capture at industrial scale is not yet considered a proven technology for efficient carbon removal technology due to high energy requirements.



Trust is build on facts and when those facts are mischaracterized, trust is eroded.
Hear Ye Hear Ye.

5. Co-pollutant Inventory and Projections

The description of the co-pollutant sources must be included in the final with actual numbers and lists of co-pollutant sources.

6. Climate Vulnerability Assessment

Where are the City of Stockton wetlands? This section only included the City of Stockton due to differing funding sources. Why not say the state funded the climate vulnerability assessment for the City of Stockton?

During public meetings recorded and non-recorded, characterization of high nighttime temperatures was requested to be included as it is included in the adopted 2018 and amended 2024 General Plan. High nighttime temperatures increase energy consumption to reduce temperatures so that good sleep can be achieved. Other negative effects result when night time cooling does not occur. Night time temperatures were not considered in the Climate Vulnerability Assessment and must be included in the Final City of Stockton Vulnerability Assessment.

7. Climate Actions

This section included information and details that were not presented during public meetings. There were lots of opportunities to select preferred actions, but the full descriptions now presented were not available and a missed opportunity to obtain public input on specifics until this stage. These comments are referencing specific CCAAP Action Tables.

T1 Expand and Improve Pedestrian Network – Year 1 should summarize all existing plans and policies. Sidewalk widening is not needed to provide space for new tree planting while protecting existing trees. Trees do not grow in sidewalks but only where there is not sidewalks. The methodology for assessing sidewalk needs should be open and transparent and described as such in the Year 1 task.

T2 Expand Bike Networks – Edit request Year 1 Update standards after assessing implementation of existing standards and evaluate existing bicycle plans to identify priority corridors.

T3 Develop and Implement Safe Routes to School Plans – Safe Routes to Schools plans are likely already available except for rural schools, possibly. This is a long standing program. SRTS vs. SR2S? Before any new plan is developed, implementation of existing plans should be presented for public comment and discussion. The City of Stockton's 2017 Safe Route to School Plan includes safety improvements that are scored by school and whether or not these safety priorities are implemented or not seems to largely depend on larger road projects. Year 1 should reference review of existing plan implementation and prioritization methodology that was used. Referencing the regional master plan should cause that SJC Council of Government be included as a Lead implementer.

T4 Support School Bus Program – should include transit agencies as Lead implementers.

T5 Improve Transit Service and Frequency – include Lathrop Transit ([Public Transportation in Lathrop, CA | Lathrop Transit https://www.lathroprtransit.com/](https://www.lathroprtransit.com/)) in the list of Lead Implementers. No explanation of the authority role of cities to expand right of ways needed to expand routes. This authority must be discussed in the Final Plan.

T6 Provide Transit Passes and Incentives – the inclusion in the text that implementation authority is shared by employers is not described. The means by which employers are required to provide transit passes and incentives must be described if included. Perhaps some jurisdictions in the Stockton MSA area require transportation management plans to reduce vehicle miles traveled. The San Joaquin Valley Air Pollution Control District (SJVAPCD) has an e-trip plan that requires consideration of certain measures for employers with over 100 employees - like the City of Stockton. Please clarify how employers are required to provide transit passes and incentives.

T7 Expand Carpool/Vanpool and Car Share Programs – a lead implementer should include the SJVAPCD. Year 1 should include an assessment of the existing SJC Council of Government programs in terms of participants and miles travelled with associated emission reductions in an open and transparent manner.

T8 Support Rail Expansion – include The San Joaquin Joint Power Authority and Caltrans as Lead Implementers.

T9 Incentivize Infill Development – Year 1 should include development of an infill program which would include the priority infill areas, incentives, streamlining (regulatory?) tools with annual reporting. If the municipal governments continue to allow for exfill, building large housing developments with incentives, the incentive level to prioritize infill becomes a significant impediment for implementation of incentives for infill development.

T10 Establish Transit-Oriented Development (TOD) Overlay Zones – most cities, if not all, already have these areas identified in their respective General Plans. The same language is in the draft for this action as the T9 Action for Year 1. Year 1 should include an assessment of existing infill rates and an evaluation of measures which are effective – throughout the County. All cities have this requirement to improve development near transit zones and what may be working in one may work in another.

T11 Improve Traffic Signaling – Year 1 should include an assessment of existing signal synchronization with consideration to the fact that excessive speed is the number one cause of accidents. SJC Council of Governments should be included as a Lead implementer.

T14 Convert Municipal Fleets to Cleaner Fuels - Year 1 assessment should include inventories of fleets by year and mile per gallon fuel usage.

T16 Provide Public EV Chargers – How could exempting a certain number of EV charging stations from conditional use requirements increase public EV chargers? I have seen some requirement for EV charging but no where any maximum requiring a conditional use permit

approved by Planning Commissions and/or City Councils. There should be a reference here to state requirements: AB 1236 and AB 970 ([Frequently Asked Questions | California Governor's Office of Business and Economic Development](https://business.ca.gov/industries/zero-emission-vehicles/plug-in-readiness/frequently-asked-questions/) <https://business.ca.gov/industries/zero-emission-vehicles/plug-in-readiness/frequently-asked-questions/>) Development of incentives must be considered in terms of incentive per public charging unit and part of this action should be an inventory of existing public charging facilities with usage data summarized.

T17 Develop a Regional Clean Freight Plan – this planning effort should result in development code amendments, identifying these corridors and specific development expectations. The implementation of this action is much more than counting the number of stakeholders engaged with a characterization of the level of engagement. Year 1 should include an assessment of clean truck use data throughout the county.

T18 Develop Warehouse Fright Truck Clean Fuel Requirements in New Projects - Year 1 should include an inventory of how existing new projects are implementing these requirements through the CEQA process and are held accountable to these AB98 requirements by community.

T19 Install Hydrogen Fueling Infrastructure - I thought this action was deprioritized? Should specify that the hydrogen stored is sourced from green hydrogen processes not hydrogen sourced from inefficient fossil gas conversions – as any energy conversion is.

T20 Support Development of a Stockton Airport Sustainability Plan – include Caltrans as a Lead implementer. Include in Year 1 an inventory of existing flights and transit trips and the involvement of the community directly impacted by airport operations and overhead flights.

T21 Support the Implementation of the Port of Stockton Clean Air Action Plan – Year 1 should include an assessment of implementation of the existing clean air action plan. The City of Stockton should consider extending the plan boundaries with City of Stockton implementation measures considered.

EG1 Install Solar on Local Government Properties – Year 1 should be an assessment of the number of existing installations with size and the number of public buildings that are suitable for solar before prioritization.

OR2 Require Cleaner-Fuel Off-Road Equipment for New Development – San Joaquin Valley Air Pollution Control District Indirect Source Rule requires mitigation through various measures or payment of a one-time fees to purchase mitigation measures to be implemented somewhere within the Air District's boundaries not necessarily where the source is located. Dependence on this measure leaves those impacted, by local government approval of new development without requiring full mitigation measures, without relief or any community benefit.

W1 Provide Outreach and Education on Recycling and Compositing – Year 1 must include a comprehensive survey of existing recycling and composting rates along with contamination in

the recycling stream which results in the stream diverted to the landfill. This information is needed to update outreach material with meaningful data that might stimulate behavior changes.

W2 Develop a Food Waste Diversion and Food Recovery Incentive and Enforcement

Program in Accordance with State Law – the existing City of Stockton and SJC Environmental Health Department agreement adopted by the City Council specifies that the City of Stockton is the enforcement agency not Environmental Health. Year 1 should be an assessment of the existing program with diversion rates and numbers of exempt businesses.

W3 Increase Construction and Demolition Waste Diversion – Year 1 should include an inventory of existing diversion rates by local governments in San Joaquin County.

W4 Require Sustainable Local Government Purchasing Practices – Year 1 should include a survey of effectiveness and best practices to reduce waste and increase reuse while defining key guidance documents, procedures, and policies. Total procurement and total sustainable procurement should be data collected (percent green spend).

W5 Collect and Use Biogas at Landfills and Wastewater Treatment Plants – Year 1 should include a characterization of the “external natural gas, fossil gas” used at existing facilities attempting to use biomass cogeneration.

WS1 Install Smart Meters Should be WS2 as WS1 is in regard to new developments – this measure specifically excludes California Water Service from any requirements. California Water Services serves approximately 50% of the largest municipality in San Joaquin County. The City of Manteca included this measure to reduce groundwater use in the urban environment and the lesson learned and effectiveness of this measure should be summarized in Year 1.

A1 Support Best Management Practices for Manure Management – Lead Implementers should include the SJC Agricultural Commissioner’s Office, the Central Valley Regional Water Quality Control Board, the California Department of Food and Agriculture and University of California Extension. Year 1 should include an inventory of the number of farms (and acres) producing manure by type of animal. Also, with this inventory should be an assessment of compliance with existing manure/solid waste management plans. An important aspect of manure management is prevention of groundwater contamination. This inventory assessment should include the number of wells with nitrate contamination within 2 miles of the farm facilities.

A2 Support Best Management Practices to Improve the Health and Function of Agricultural Lands – Lead implementers should include the SJC Agricultural Commissioner’s Office not SJC Council of Governments. Also include the UC Extension Office and the California Department of Food and Agriculture as the Department of Food and Agriculture has developed funding for the implementation of conservation practices and conservation plans.

S1 Expand Urban Tree Planting – Year 1 should include identification of existing tree locations and percent canopy cover within the spheres of influence of local governments. This information is necessary to identify priority planting areas and update local tree requirements. These tree requirements should be included in the development code.

S2 Increase Public Parks with Natural Vegetation – what does natural landscape and vegetation consists of. Historically the Stockton MSA has been predominately an oak woodland environment. Will vegetated open space include predominately oak tree species?

S3 Create a Regional Urban Forest Master Plan – this Action was changed to CREATE AND IMPLEMENT. Year 1 should include a tree inventory and tree canopy acreage to understand where additional tree resources are needed

AD01 Establish an adaptation strategy review process with Climate Action Plan Advisory Committee oversight to monitor and track progress of climate strategy implementation – The existing Advisory Committee was formed on a temporary basis and if the Committee were to continue statement of economic interests would be required as the Committee would be established and ongoing not a temporary Committee.

AD03 Pursue funding to implement adaptation projects - Lead implementers should also include the Economic Development Department as an important business facing city services.

AD04 Establish a multilingual climate hazard alert system -Lead implementers should also include the SJC Office of Emergency Services (developing a new hazard alert plan) and the Community Services Department for implementation.

AD05 Create resilience hubs to provide community support and climate adaptive services, especially during heat waves or extreme weather events – the hubs should also be set up to respond to poor air quality days as indicated in the description but not the title. Lead implementers should also include the SJC Office of Emergency Services and the San Joaquin Valley Air Pollution Control District as well as the Fire Department. Local air monitoring should be expanded to include monitoring of these resilience hubs. Year 1 should include an assessment of available resources at existing city facilities for equity. The location of existing water fountains throughout the community and the need for additional water fountains should be considered.

AD06 Develop an extreme heat action plan and conduct outreach campaigns to enhance community understanding of how to be prepared for extreme heat – Lead implementers should also include SJC Public Health Services and SJC Office of Emergency Services. Year 1 should include partnerships to assess the urban heat island temperatures throughout the community so that mitigation measures can be developed for the extreme heat action plan. This assessment should measure temperature by Census tract to prepare specific plans to lessen the impact of extreme heat because not every Census tract in Stockton is created equal.

AD07 Increase tree canopy and integrate heat-resilient infrastructure in heat vulnerable neighborhoods – Lead implementers should include SJC Public Health Services which could implement the temperature study to identify vulnerable neighborhoods as well as Community Services whose involvement in with parks and community centers is integral and Office of Emergency Services. Metrics for tracking progress should include the percentage of shade canopies by Census tract and ambient air temperature.

AD08 Create a partnership agreement with ride share programs and the bus system to provide free rides to resilience hubs/cooling facilities during extreme heat events and other disasters – is this adaptation action to be implemented throughout the Stockton MSA area or only within the City of Stockton? The inclusion of all transit agencies except for the Lathrop transit agency suggests such. If these resilience hubs/cooling facilities are to be available throughout San Joaquin County, then all local governments should be included as Lead implementers.

AD09 Connect residents with resources and programs to improve resilience of their homes to flood and extreme heat – Lead implementers should also include the Municipal Utilities Department relating to onsite water drainage modifications, Office of Emergency Services relating to disaster recovery and preparation, and the Office of Environmental Sustainability whose staff is focused on environmental sustainability. Having an outreach coordinator seems to be part of public information.

AD10 Upgrade road and pedestrian surfaces in areas with high vulnerability to extreme heat and flooding – areas of high vulnerability to extreme heat and flooding relating to riverine and urban infrastructure limitations should be identified as a first step. These modifications should be required in the development code which would involve the Community Development Department as an additional Lead implementer. The costs associate with upgrading surfaces vs. providing shade canopies should be considered.

AD11 Enhance Community Resilience to Wildfire Smoke and Poor Air Quality – Lead Implementers should include SJC Public Health Services along with local hospitals and health center facilities involved to ensure that health facilities are available with a plan for increased patients related to respiratory distress when there are poor air quality conditions.

AD 12 Ensure critical facilities can operate and provide refuge during extreme heat and flooding events – how will the Port of Stockton provide refuge during extreme heat and flooding events? Implementers should include SJC Public Health Services along with local hospitals and health center facilities involved to ensure that health facilities are available with a plan for increased patients related to heat illness.

AD13 Implement and expand the General Plan’s infrastructure flood resilience strategies – these strategies need to be expanded to include areas of the community that regularly flood related to poor drainage design and inadequate street level infrastructure not just when levees break. The use of the climate vulnerability assessment to make changes in land use planning,

capital improvement programming and facility design should be done only after the implications of the assessment's limitations have been considered and with community discussions specifically related to funding planning changes.

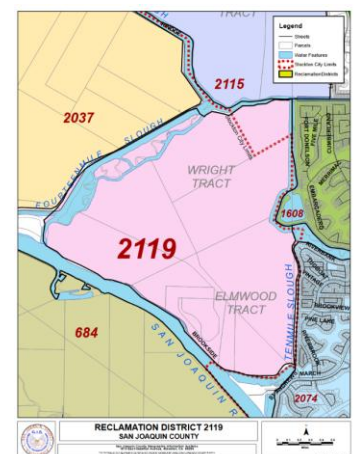
AD14 Use of nature-based solutions to support groundwater recharge and stormwater mitigations – the Municipal Utilities Department should be included as a Lead implementer relating to involvement with stormwater planning. Identification of parks with areas to perform the water services is needed and should also include community involvement.

AD16 Update codes to allow greywater infrastructure, dual plumbing, rainwater capture systems for on-site water reuse – formalizing what people may already do on their property requires significant outreach and consideration of the costs to develop a regulatory program associated with municipal code updates. The Action includes investigation, exploration but also establish a youth workforce development training and volunteer programs. Seems like there might be other areas where youth workforce development might work not relating to compliance with potential municipal code amendments.

AD17 Develop drought-tolerant landscape where it doesn't yet exist, ideally with stormwater benefits, and implement a water schedule to prevent water during the hottest time of the day -use of compost to reduce evaporation should be a priority as well since the City of Stockton has contracted with the number one source of air pollution from a stationary source in Stockton to combust the compost creating air pollution and greenhouse gas emissions. Why the Community Development Department is included here as a Lead Implementer is unknown as there does not seem to include an action relating to the development code other than is already included for specific uses?

AD18 Update the 2022 Wastewater Master Plan and 2021 Water Master Plan to integrate climate change into utility planning – the January 2023 Stormwater Master Plan should also be updated to integrate climate change. The only time climate change was included in the January 2023 Stormwater Master Plan is in regards to the integrated regional water management program.

AD23 Enhance regional planning efforts by developing a citywide ecosystem services inventory – ecosystems beyond wetlands should be inventoried and protected. I guess I answered my own question where are there wetlands in the City of Stockton? The Pace Preserve is a 50-acre wetland and mixed riparian preserve located next to the San Joaquin River near the city of Stockton and Buckley Cove Marina in San Joaquin County. The Preserve was created in 1993 by the Grupe Company as mitigation for their Brookside development in the city of Stockton. The Center for Natural Lands Management (CNLM) became owner of the Preserve in February 1995. At that time, a conservation easement over the 50 acres was deeded to the California Department of Fish and



Wildlife (CDFW). This facility is located on Elmwood Tract and reportedly not open to the public. We need public nature areas.

8. Burdened Community Benefits Analysis

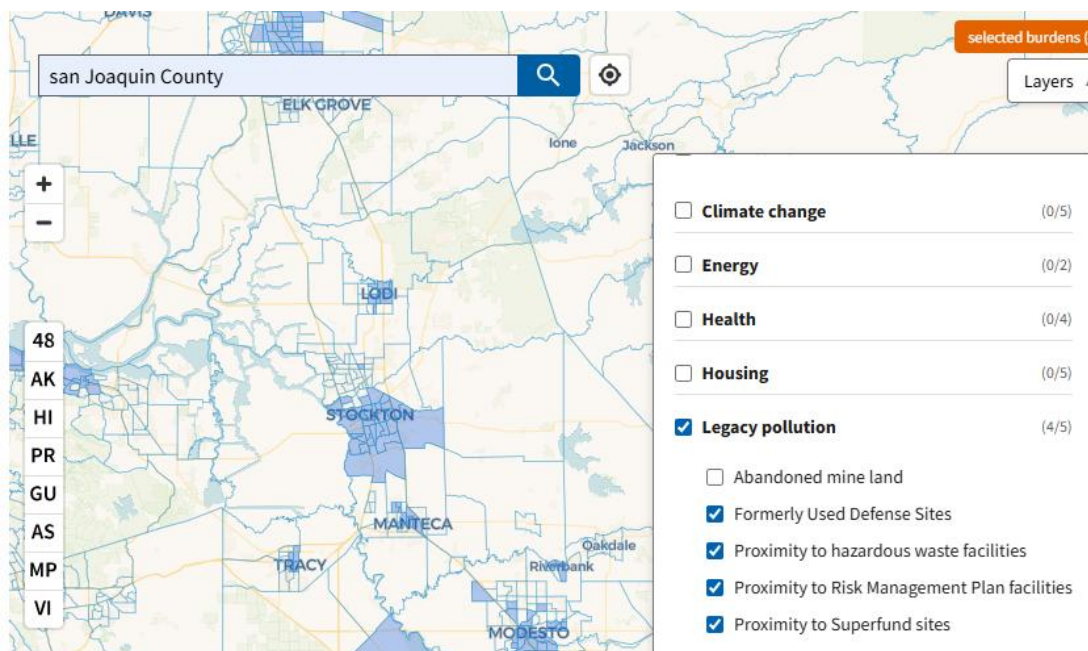
The Climate and Economic Justice Screen Tool indicated that nearly 46% of San Joaquin County residents are considered burdened due to socioeconomic, environmental, climate or other factors. The Climate and Economic Justice Screen tool access site (<https://ndcpartnership.org/knowledge-portal/climate-toolbox/climate-and-economic-justice-screening-tool-cejst>) includes the following statements:

Note on current status

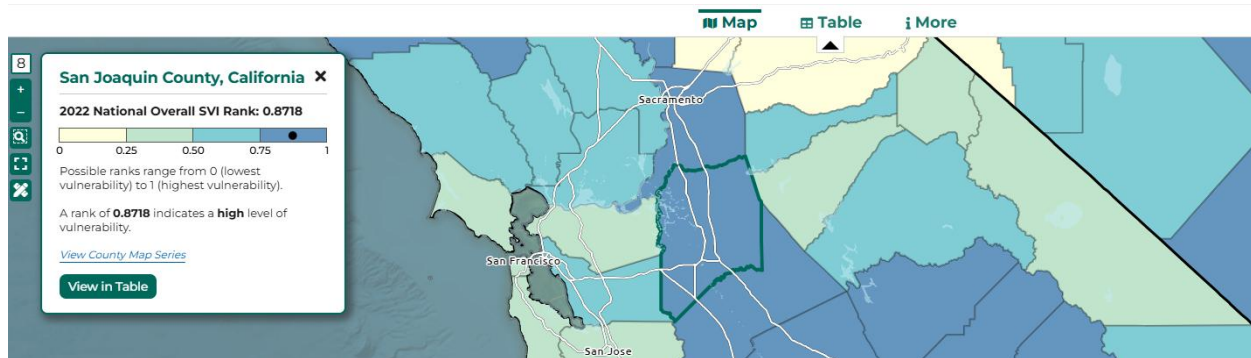
Although the tool remains unchanged, public access through the White House was discontinued on January 22, 2025. The currently available version is an unofficial copy of the CEJST Tool, and some links and text may incorrectly suggest that this site is affiliated with the US Government.

The tool is able to filter results showing that energy is an affordability issue for 43% of residents representing 330,7824. The total number of residents and the year is missing when making these demographic percentages. This is a need that should be a focus so that San Joaquin County residents can spend their limited income on other needs like housing (18%) and/or workforce development (30%). Energy use affects the amount of energy that is produced and related greenhouse gas emissions. More energy use – more greenhouse gases – more global warming.

The tool also shows that legacy pollution is also a burdensome issue in those areas of San Joaquin County where industrial facilities were located where housing for poorer residents was also co-located. These areas should have a special focus for reinvestment to improve conditions like through vegetive barriers with truck counts conducted and air monitoring to inform the community when meteorological conditions exist to intensify the legacy burden. Reducing exposure to legacy pollution can also be a benefit of climate mitigation and adaptation actions.



The Centers for Disease Control/ Agency for Toxic Substances and Disease Registry Social Vulnerability Index (<https://www.atsdr.cdc.gov/place-health/php/svi/svi-interactive-map.html>) indicated that considering social vulnerability the residents in San Joaquin County have a high level of vulnerability. This map from the Social Vulnerability Index tool really shows that continued interagency coordination at the County level is a topic that should get more attention in order to focus efforts to increase community resiliency. Some agencies include Health Care Services Agency (intra-agency) Human Resources (workforce), Human Services Agency, and Community Development make up the Stockton MSA Health Care Ecosystem.



The 2025 San Joaquin County 2025 Community Health Needs Assessment (https://www.sjcphs.org/docs/default-source/phs-documents/default-document-library/sjc-chna-2025.pdf?sfvrsn=e63b707a_4) included reference to the social vulnerability status further emphasizing the need to coordinate between health related systems, utilities, and building and planning with consideration on developing unified policies to address these needs relating to social and climate change vulnerabilities relating to drought, heat waves, air pollution, water contamination, and flooding risk. There are areas that are at risk of street flooding due to infrastructure limitations. The social vulnerability factors considered economic data as well as data regarding education, family characteristics, housing, language ability, ethnicity, and vehicle access.

Considering building energy actions (BE): BE1 Upgrade Public Outdoor Lighting and BE2 Promote Existing Incentives for Energy-Efficient and Electric Building Equipment action benefits and disbenefits within census tracts across the Stockton MSA, identified in Appendix G, has the language altered as the actions relate to lighting and there is no explicit analysis of how or how not upgraded outdoor lighting would benefit energy, health, housing or workforce development. There are benefits related to decreased accidents, safer environments, and disbenefits that could be mitigated are impacts related to light pollution. The potential disbenefit and mitigation strategy relating to energy and BE2 incentives includes language that has never been discussed:

Provide financial support (such as partial or full subsidies) for low-income households and small or minority-owned businesses to lead the way in electrification process with pilot projects focusing on these areas first. Consider incentivizing grid meter upgrades.

Further, health benefits, potential disbenefit and mitigation strategy relating to BE2 include the following:

“Work with local electric utility providers and governments to provide incentives for low-income communities to electrify households
 Work with local electric utility providers to educate the community on the health risks of gas appliances and benefits of converting to electric appliances. “

The Health Care Ecosystem within the Stockton MSA should be involved with educating the community about the harm of methane gas appliances in homes. The language in Actions – Section 7 state “work with utilities to promote existing incentives and develop new incentives for energy efficient and/or electric building upgrades.” How will Stockton MSA local governments develop new incentives and will those incentives be available for all, only for those living in socially vulnerable overburdened census tracts, or based on income thresholds? The implementation schedule states “Develop and promote new incentives” but does not identify the proposed funding source for these incentives or the process whereby these incentives will be developed except through updated outreach. Without clearly describing how these new incentives will be developed – this action only looks good on paper. These building based climate actions need to require more than tracking existing lighting changes and use of incentives.

Considering Off-Road Actions:OR2 Require Cleaner-Fuel Off-Road Development and OR3 Use Cleaner-Fuel Off-Road Equipment for Municipal Operations – the Authority to reduce emissions of toxic pollutants and greenhouse gases is in the Action 7.5.4. But when it comes to overburdened residential housing the discussion is all about providing additional financial or administrative incentives or technical assistance working with SJVAPCD to obtain grants for local construction businesses to upgrade their equipment. Housing costs and development (construction) costs are largely driven by labor and construction supplies and what the housing market will

bear. There is historically a disconnect with residents in Stockton paying much more than the cost of development as shown in the table (right). The result of this disconnect

contributed to the extremely high foreclosure rates experienced in Stockton.

(<https://www.forbes.com/sites/adammillsap/2025/08/15/new-studies-explain-why-housing-is-so-expensive-and-why-it-is-so-hard-to-make-it-cheaper/>)

2010–2015		2015–2020		2020–2024	
City	%ΔPrice – %ΔCost	City	%ΔPrice – %ΔCost	City	%ΔPrice – %ΔCost
Stockton, CA	5.3	Boise, ID	8.9	Miami, FL	8.6
San Francisco, CA	5.1	Spokane, WA	7.1	Knoxville, TN	8.1
Vallejo, CA	4.9	Tacoma, WA	7.0	Camden, NJ	8.0
Denver, CO	4.4	Tampa, FL	6.5	Savannah, GA	7.5
Reno, NV	4.1	Las Vegas, NV	6.1	Lewiston, ME	7.3
Columbia, SC	-4.6	Decatur, IL	-1.1	Baton Rouge, LA	-1.2
Tuscaloosa, AL	-4.7	Shreveport, LA	-1.1	Shreveport, LA	-1.8
Mobile, AL	-5.2	Lawton, OK	-1.3	New Orleans, LA	-1.9
Rockford, IL	-5.4	Springfield, IL	-1.5	Odessa, TX	-2.5
Montgomery, AL	-5.7	Peoria, IL	-1.5	Lake Charles, LA	-2.8

Note: House price data are the FHFA metro-specific indexes, and building costs are from RSMears. Details are available in the Supplemental Appendix.

Price-cost deviations
 BUILDING COSTS AND HOUSE PRICES [HTTPS://WWW.AEAWEB.ORG/ARTICLES?ID=10.1257/JEP.20241432](https://www.aeaweb.org/articles?id=10.1257/jep.20241432)

Developers using cleaner off-road equipment should be a requirement without cities having to come up with fee reductions which lead to greater burden on existing residents, having to forgo on services to pay for those incentives. The City of Stockton does not have any imposed housing limitations and has adopted all required regulatory reforms to encourage housing. If this is not the case for the other jurisdictions with the Stockton MSA, then those required regulatory reforms should be implemented immediately. Additionally, requirements for off-road equipment have been updated and approved in January 2025 by the US EPA for implementation of the California Air Resources Board Rules which should be referenced and also includes public works contracting requirements (https://ww2.arb.ca.gov/sites/default/files/2025-07/ORD%202022%20Enforcement%20Advisory_1.pdf).

9. Intersection with Other Funding

Additional funding not identified is the designation of part of the 6% utility tax that, in San Joaquin County, is only collected by the City of Stockton. Additional funding can be achieved if the City of Stockton Council were to end the incentive for above moderate-income housing and use this money for facility upgrades to accommodate the impacts on public facilities which these fees were meant to mitigate. Additionally, the City of Stockton Council could implement, at least, a regular increase in public facility fees related to inflation that many neighboring local governments do instead of relying on outdated fees waiting for the elusive NEXUS study.

When adding definitions and details to priority Actions there must be some process whereby the community involved with the development of the Plan can participate and provide meaningful input. Often once the concept is developed, the City of Stockton goes forward and the community may never have an opportunity to provide input again. Proposition 4 funding should be tracked as a priority as this level of investment is a once in a lifetime opportunity to fund clean energy, climate resilience, water and nature-based solutions to our climate crisis.

10. Workforce Planning

The City of Stockton should consider it's use of contractors that may or may not be local because funding for contractors without a workforce development provision is a lost opportunity to provide Stockton residents with work experience building employment capacity. City Departments and Offices should consider ways to provide part-time work for adults to further enhancement of municipal service as a potential occupation, supporting work study opportunities that are available to college students while attending school. Also, when thinking about construction jobs, an emphasis should be placed on construction workforce development other than construction of new houses or buildings. We have many older homes in our community in need of skilled construction workers. Diversity is needed not just factory construction work.

The Draft Plan is an important first step but the details of implementation are missing, which I understand are forthcoming. You may contact me at mebeth@outlook.com.

Sincerely,
Mary Elizabeth, M.S., R.E.H.S.

Restore the Delta
2616 Pacific Ave #4296, Stockton, CA 95204
209-479-2559
www.restorethedelta.org



City of Stockton
Attn: Stockton MSA CCAAP Team
425 N. El Dorado St.
Stockton, CA 95202

Sent via email.

May 1, 2026

Dear Stockton MSA CCAAP Team:

Restore the Delta is a 501c3 nonprofit organization working in the areas of public education, research, program and policy development, and outreach so that all Californians recognize the Sacramento-San Joaquin Bay Delta as part of California's natural heritage, deserving of restoration. We interface with local, state and federal agencies to advance this vision.

We are coalition builders, climate and water policy experts, farmers, researchers, and San Joaquin Delta residents tackling deep systemic challenges in our community. For the past 19 years, we've partnered with Delta tribes, farmers, and disadvantaged communities to chart a sustainable economic future for the Delta. We envision a Delta region with fishable, swimmable, farmable, and drinkable waters; regenerative agriculture practices honoring family farms; restoration rooted in traditional ecological knowledge in partnership with tribes; and abundant community wealth building opportunities. Our work finds us in government planning spaces advocating for water quality, flood and drought protections; out on Delta waterways monitoring water quality and hazardous algal blooms; developing strategies with farmers and landowners to reverse island subsidence; and assessing new energy and carbon management technologies being proposed in the region for environmental protections and community benefit.

Restore the Delta respectfully writes in support of the City of Stockton's Comprehensive Climate Action and Adaptation Plan ("CCAAP"), and provides input and recommendations on the sections regarding carbon sequestration, water supply, energy, and restoration efforts. First and foremost, we appreciate the City's recognition that the CCAAP itself cannot succeed without local implementors, partners, and champions, and stand ready to collaborate with the City on community-led climate actions. We appreciate the detailed analysis surrounding the vulnerabilities of communities across Stockton, as well as efforts the City can take to ensure Stockton is prepared for the impacts of climate change. It's important to highlight the most vulnerable communities, and those investments should be prioritized. Our primary recommendation is that the plan should highlight ongoing local efforts to mitigate the impacts of climate change, and expand upon existing programs to ensure Stockton communities are protected.

Climate Vulnerability

The CCAAP relies heavily on data from the Climate and Economic Justice Screening Tool (CEJST), which leverages census tract data with numerous climate criteria. This is an important tool in understanding climate vulnerability to the region, however other tools including CalEnviroScreen 5.0 provide additional perspectives and analyses that could be used to inform some of the recommendations captured in the CCAAP. A high-level overview of the CEJST and explanation for why the CCAAP depended upon this tool would be helpful to better understand the underlying data and resources informing the climate vulnerability assessment and subsequent recommendations.

The Plan itself identifies key areas across Stockton that are more vulnerable to extreme heat, a rising concern in the face of temperature changes associated with climate change. Included in the most vulnerable locations are numerous areas along the Mormon Slough (i.e. Garden Acres, Morada/Holman). Restore the Delta in partnership with the Mormon Slough Restoration Association (MSRA) have embarked on an effort to restore the slough. The MSRA is a participatory planning body of Tribal governments, public agencies, and NGOs spanning public health equity, arts, youth and workforce development, environmental advocacy, faith-based, and business development organizations collaborating on a vision for the slough as a greenway with pocket parks – one that honors the land, its ancestors, and the people who live there. The MSRA has begun design and planning processes for the revitalization of two pilot sites along the slough, with long-term restoration goals spanning the full 6.3 miles of the slough. The goal is to restore the slough as an economic and recreational asset, flood control mechanism, and a climate vulnerability asset that will enhance the quality of life for South Stockton community members.

We encourage the City of Stockton to consider incorporating the Mormon Slough Restoration Project into the CCAAP as a specific project that can reduce climate vulnerabilities, like extreme heat and flood risk, and bring numerous additional community benefits. Specifically, the project could be incorporated under multiple climate actions in chapter 7, including AD07, AD10, AD13, AD14, AD17, and AD23. Additionally, we suggest the Mormon Slough Restoration Project be included in final CCAAP as one of the 20 priority actions for action costing (7.2.3 Cost of Actions).

We are also supportive of AD04 (Establish a multilingual climate hazards alert system), and recommend adding one metric for tracking progress: the amount of funding spent contracting with community-based organizations to support translation and interpretation services.

In addition, we recommend under AD03 (Pursue Funding to Implement Adaptation Project) to consider creative municipal financing mechanisms such as [Climate Resilience Districts](#), to ensure sustainable funding for maintenance of climate infrastructure assets over time.

Water Supply

Restore the Delta supports efforts to conserve water as a climate vulnerability strategy. As California experiences extreme precipitation events, reduced snowpack, and extended dry periods, it is important to identify ways to meet urban and agricultural demand. Under 7.6.13 AD14, we support continued efforts for groundwater recharge. We recommend highlighting the progress already made, primarily in the development of the Delta Water Treatment Plant (DWTP)'s groundwater recharge project. By promoting ongoing projects, the CCAAP can draw a clear line to meeting the goals outlined in the plan.

Carbon Removal

The CCAAP section 4.3 highlights numerous strategies for carbon sequestration and reduction in emissions. Restore the Delta uplifts nature based solutions, including tree planting and increased green spaces, as a strategy to reduce carbon in the atmosphere. However, we believe this section could be strengthened given that Stockton and the surrounding Delta is targeted for development of engineered carbon removal technologies. That includes proposals for Direct Air Capture facilities and several Class VI CO₂ Injection well applications currently under review by the U.S. Environmental Protection Agency.

We encourage the CCAAP to acknowledge and distinguish between Mitigative Carbon Capture and Storage (CCS), which captures point source industrial emissions and decarbonizes hard to abate sectors, and Carbon Dioxide Removal (CDR), which removes legacy emissions directly from the atmosphere. For any engineered CDR (such as Direct Air Capture) with large industrial footprints, we urge the city to require community-led mitigation and benefits planning, in partnership with community-based organizations.

Energy

Energy demands continue to rise across the state, and we agree that addressing these energy and associated cost challenges is crucial to a more resilient Stockton. In addition to the vulnerabilities associated with climate, Restore the Delta also highlights the increasing demand from emerging technologies and industrial development, including data centers serving Artificial Intelligence (AI) loads (i.e. hyperscale cloud data centers), bioenergy projects, and previously proposed hydrogen projects. The CCAAP should evaluate the impact of these emerging technologies on our energy and water systems, as well as the direct impact to communities. If this plan is intended to support mitigation strategies early, it should consider the full breadth of influences.

The City has a chance now to articulate a position on data center development and other energy-adjacent infrastructure such as pipelines, that prioritizes local economic, environmental, and community benefits, rather than reacting project-by-project, as has been tradition with warehousing development over the past several decades. We recommend inclusion in the CAAP a directive to the City to develop a land use ordinance articulating zoning, permitting, and development priorities for hyperscale cloud data centers. Such a process could consider guardrails for environmental, workforce, and economic impacts, such as energy sourcing

requirements; water usage restrictions; setbacks from residential areas; community benefits funding; project labor agreements; and other issues within the City's jurisdictional purview.

Additionally, we recommend removing EG3 under 7.7 Additional CCAAP Actions, which calls for the City of Stockton to join Ava Community Energy, as the City has already enrolled with Ava as the default energy provider for local residents and businesses.

Conclusion

Restore the Delta appreciates the City of Stockton's in-depth analysis of risks associated with a changing climate, as well as the extensive list of recommended actions. We encourage the City to consider Restore the Delta's input and recommendations to strengthen the CCAAP, and provide opportunities to build on existing community projects.

Sincerely,

Morgen Snyder
Director of Policy & Programs
Restore the Delta

Davis Harper Zapata
Director of Strategic Planning
Restore the Delta



SAN JOAQUIN COUNCIL OF GOVERNMENTS

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THE COUNTY OF SAN
JOAQUIN

April 30, 2026

SENT VIA EMAIL

Shalilah Bess

Program Manager III

City of Stockton

climateaction@stocktonca.gov

RE: Draft Stockton MSA Comprehensive Climate Action and Adaptation Plan Comment Letter

Dear Ms. Bess:

Thank you for the opportunity to review the Draft Stockton MSA Comprehensive Climate Action and Adaptation Plan (CCAAP). We appreciate the work that has gone into developing the CCAAP, which provides a roadmap for the Stockton region – San Joaquin County and all incorporated cities – to take action on climate change. The plan outlines a pathway to reduce greenhouse gas emissions, improve local climate resilience, and benefit residents and neighborhoods, especially those most affected by environmental and economic burdens.

The San Joaquin Council of Governments (SJCOC) offers the following comments and recommendations consistent with the region's ongoing planning and implementation of the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS):

1. Ongoing commitment to support regional coordination for climate resiliency

The planning and implementation of the RTP/SCS requires intergovernmental coordination to support local priorities and actions and align them with regional goals. In the spirit of regional coordination for climate resiliency, SJCOC remains a committed partner in planning and implementation, especially as climate solutions help to reinforce the RTP/SCS (in reference to 2.7 Intergovernmental Coordination, 2.8 Continued Engagement). Staff will continue to include the City in advancing regional climate solutions, and we similarly request that the City continue to include SJCOC in its continued work to advance its priority climate solutions.

2. Section 2 – CCAAP Development Process

Since 2023, SJCOG and its partners have been working together under the initiative called the San Joaquin Regional Climate Collaborative. This initiative was built on SJCOG's 2020 Climate Vulnerability Assessment and its 2022 Regional Resiliency Implementation Plan. Through numerous community workshops, a needs assessment survey, and focused outreach in Lodi, Stockton, and Tracy, the Collaborative has identified needs and priorities that directly align with those identified in the Stockton CCAAP through its community outreach and engagement activities. The parallel outcomes triangulate the planning work conducted by the City and further bolsters a need to coordinate and partner on implementing climate solutions that are responsive to the communities' needs and priorities.

3. Section 7 – Climate Actions

As summarized in Section 3. GHG Inventory and Projections, most gross emissions in the Stockton MSA are from the transportation sector. As the Metropolitan Planning Organization (MPO) and Regional Transportation Planning Agency (RTPA), SJCOG serves a unique role in the region to develop and implement the RTP/SCS, a long range planning document that outlines the next 20+ years of transportation investment and strategies to implement growth in a way that reduces vehicle miles traveled and greenhouse gas emitted through transportation sources to meet state targets. For a majority of the outlined transportation-related Climate Mitigation Actions identified in Section 7, please consider SJCOG as an implementation partner.

With regard to specific references to the 2012 Regional Bicycle, Pedestrian, and Safe Routes to School Master Plan, SJCOG staff notes that it is currently undergoing an update, with expected completion in 2026. Staff recommends noting this to ensure future alignment with the updated plan, which will include new project prioritization methods, safety analysis, and equity-focused investments.

For Action 7.5.1.5T5. Improve Transit Service and Frequency, please note that SJCOG conducts the annual Unmet Transit Needs process, which assesses transit needs across the region. This may be an opportunity to partner on the identified action outlined for Year 1 implementation.

4. Section 9 – Intersection with Other Funding Sources

In reference to regional planning efforts in Section 9.1.1, please consider including the San Joaquin Regional Climate Collaborative (RCC) and the San Joaquin Regional Mobility Hub Plan. The RCC is a planning and capacity building initiative that has established a regional forum that includes community-based organizations, local government, and residents. Such a forum can enable coordination amongst implementing agencies and community partners advancing climate solutions.

The San Joaquin Regional Mobility Hub Plan was developed in 2025, which identified a regional network of mobility hubs to coordinate transportation services and programs and promote the reduction of vehicle miles traveled. The Plan includes the identification of over 40 locations throughout the region. One hub in Stockton at Cabral Station was prioritized in the top three for implementation. SJCOG staff notes that Mobility Hub implementation is actively advancing with its first demonstration project at the Tracy Transit Hub. Staff recommends noting that there may be near-term opportunities to partner on efforts to seek implementation funding for priority project sites and the surrounding area, specifically for transit and bike/ped improvements.

Overall, SJCOG staff appreciates the level of technical detail and analysis that was conducted as part of the Stockton CCAAP and we look forward to ongoing coordination toward advancing climate solutions that also reinforce the RTP/SCS. If you have any questions, please call or email me at (209) 235-0128 or corrales@sjcog.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Corrales". The signature is fluid and cursive, with the first name being more prominent than the last.

Christine Corrales, Manager of Planning

----- Forwarded message -----

From: **peter hawley** <peterhawley07@gmail.com>

Date: Mon, May 11, 2026 at 11:27 AM

Subject: Re: CCAAP Comments

To: Jasmine Peterson <jasmine@littlemanila.org>

Here's my public comment for the Stockton MSA Comprehensive Climate Action & Adaptation Plan (CCAAP). I appreciate this follow-up, Jasmine. Apologies for the delay in response. I've been busy lately working on research for my org and on an environmental stewardship project for a naturalist certification course I'm taking out at the Cosumnes River Preserve. Want to leave a public comment that's in-depth as possible, but I know that there's more in the CCAAP that I want to examine at a closer level. This is my best attempt at condensing a series of notes I've made about the CCAAP over the course of a few weeks.

I plan on attending the next CRC workshop Little Manila Rising is hosting on 5/14 so hope to see you in-person again soon.

Public Comment:

The Stockton MSA Comprehensive Climate Action & Adaptation Plan (CCAAP) is a necessary expansion to the Stockton MSA Priority Climate Action Plan (PCAP), as it establishes a more actionable and strategic roadmap for achieving climate resiliency goals in Stockton. I appreciate the inclusion of greenhouse gas (GHG) inventories and projections, sector-specific reduction targets, a climate vulnerability assessment, and a series of mitigation and adaptation actions. While the PCAP focused mainly on emissions reductions, the CCAAP develops a clearer focus on climate adaptation and mitigation actions for burdened communities in Stockton, such as developing resilience hubs, response planning for extreme heat, urban forestry, flood resilience, and improvement to critical infrastructure like public transportation. The CCAAP also represents a stronger commitment to equity by providing more data analysis to recognize and identify which communities in Stockton will be most affected by climate change and in what areas. Perhaps most importantly is the CCAAP's consideration of the City of Stockton's implementation and funding of proposed climate mitigation and adaptation actions. This is

the area that I believe needs the most development by the time the CCAAP receives a formal status report in 2027.

While the CCAAP includes a detailed list of actions, many of them, I feel, lack clear pathways for implementation. To improve the logistics of accountability, each action should include defined timelines, responsible agencies, funding commitments, and measurable performance indicators. Developing a standardized procedure for implementation of priority actions would enhance transparency and the tracking of each program more efficiently. For the City of Stockton to fully realize its commitment to environmental justice and equity, a final draft of this plan needs to move beyond just analytical rigor and toward implementation logistics by prioritizing place-based investments and ensuring that burdened communities receive immediate and measurable benefits. More specific concerns of mine are detailed down below:

1.) Adaptation actions are listed in Section 7.6 (pp. 7-35 to 7-46), but lack specific implementation details. At the moment, these actions are descriptive, not operational. For example, with climate action AD05 (pp. 7-36 to 7-37) on creating resilience hubs, there is a lack of specification as to which neighborhoods in the Stockton region have the most critical need for resilience hubs, whether these resilience hubs will be retrofits of pre-existing buildings or comprise of newly constructed facilities, a lack of budget estimates or secured funding, quantitative targets as to how many resilience hubs should be developed, and lack of a specified operating model as to whether these resilience hubs will be run by the City of Stockton or through community-based organizations such as Little Manila Rising. On the last point, knowing that a long-term goal of LMR is to retrofit one of their buildings into a resilience hub, my assumption is that most resilience hubs will be operated through the City of Stockton, San Joaquin county government, and/or school districts as schools, libraries and community centers are listed as primary locations. An operating model that discerns LMR's goal of developing a resilience hub as an interrelated but separate action from what the City of Stockton may be planning would be helpful.

2.) Data analysis for equity concerns exist in the CCAAP, such as the mapping of burdened communities through the Climate and Economic Justice Screening Tool (CEJST), an analysis of the potential benefits/disbenefits of proposed climate actions, and an acknowledgement that 77 of 139 census tracts are burdened. But overall, this analysis is not yet tied to resource allocation. There is no specificity as of yet as to which burdened

communities in the Stockton MSA should receive priority investment and how funding will be allocated to priority neighborhoods. At the start of Section 8.4 (pp. 8-12 to 8-21) when discussing action benefits and disbenefits, it is stated that *The majority of the CCAAP actions are not limited to a specific geographic location, as they are intended to be implemented across the region* (p. 8-12). While it's important for the benefits of climate actions proposed in the CCAAP to be felt across the Stockton MSA region, it is also important that the most burdened communities feel the most direct benefits. Calls for equity risk becoming symbolic if actions are at risk of hurting burdened communities more than helping them. The CCAAP acknowledges the possibility of certain climate actions exacerbating disparities within burdened communities (p. 8-1). While an acknowledgement is fine to have, and I greatly appreciate how Section 8.4 lists the potential disbenefits of certain climate actions and how to mitigate them, everything that the CCAAP proposes is still largely abstract. A clearer idea about how climate actions may affect communities in positive and negative ways won't be established until more of these actions begin to be implemented. My main concern is that calls for equity will be gradually ignored/minimized once actions are implemented and begin to see likely obstacles.

3.) The CCAAP's section on workforce planning is an appreciated section on addressing unemployment issues affecting burdened communities, but currently lacks a direct linkage to specific climate actions. The CCAAP broadly identifies workforce needs, but does not specify workforce development risks being detached from actual project delivery, which will limit local economic benefits to burdened communities.

4.) Community engagement for the CCAAP as implemented through CBOs such as Little Manila Rising has been extensive, but maintains a top-down decision making structure. CBOs are engaged primarily in outreach, not the implementation or governance of climate actions/mitigations proposed in the CCAAP, leaving those in the hands of city government officials. The Climate Action Plan Advisory Committee that is convened by the Mayor of Stockton is helpful in theory, but again runs into a similar issue of community engagement being done through a top-down approach. The committee is appointed by city council to provide recommendations, but those recommendations can be as easily ignored as they may be accepted by the council. Most people don't know who their city council members are, let alone people appointed to a committee by city council, even if committee meetings are open to the public. While the Climate Action Plan Advisory Committee is technically a citizens advisory board, does the committee itself actually serve/are aware of the needs of most citizens in the Stockton MSA? Is a government body technically being transparent if

everything they do is available to the public, even if the majority of people aren't aware of it? If there's a lack of public awareness as to what the CCAAP is and how recommendations are being made, then that lack of awareness can undermine public trust in proposed climate mitigations and actions once implementations begin and community members decide that they're against certain actions, especially if there's potential for actions to disrupt particular areas and neighborhoods.

5.) The regional focus of the CCAAP ultimately leads to the plan offering generalized strategies instead of neighborhood-level targeting. Climate adaptation plans specific to certain neighborhoods would enable high-risk areas to receive faster and focused intervention, with those areas receiving early investment over more affluent neighborhoods.

6.) Data metrics for success and the overall emphasis of the CCAAP is focused on the reduction of GHG emissions over the improvement of lived outcomes. While emission reductions are an important part of addressing climate resiliency, an overemphasis on emissions could result in metrics concerning human impact to be obfuscated. Other metrics that should be considered for the successful implementation of the CCAAP are: reductions in heat-related illness, decrease in asthma rates, household energy cost savings, increased access to cooling centers and green spaces.

Overall, while the CCAAP is a significant improvement to the CPAP, it falls short in translating data analysis into enforceable, place-based investment. Key gaps that need to be addressed include the absence of implementation specificity within climate adaptation actions and a lack of investment mechanisms that will ensure equity. Strengthening these areas, particularly by prioritizing high-risk areas through targeted investments, near-term protections, and community-led implementation that gives burdened communities autonomy in city government decisions, is critical to ensuring that the CCAAP and future iterations will deliver measurable improvements to climate resilience and public safety/health in the Stockton MSA region. As the CCAAP itself states, this is the first step of many to ensure that the Stockton MSA is able to endure the effects of climate change over the next few decades. Many of the CCAAP's stated goals are still at a preliminary status. My comments reflect a need where certain areas of the CCAAP should be expanded upon in order to produce tangible, measurable and effective results, recognizing that this document and future iterations should ideally be seen as a living document that needs to

be continually updated in order to recognize ongoing developments and circumstances within the Stockton MSA.

Sincerely,

Peter Hawley

Education Coordinator

Working Class Unity

Pronouns: He/They

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