



*The County of San Diego*

# Planning Commission Hearing Report

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<b>Date:</b>	October 1, 2021	<b>Case/File No.:</b>	PDS2020-GPA-20-004
<b>Place:</b>	County Conference Center 5520 Overland Avenue San Diego, CA 92123	<b>Project:</b>	Climate Action Plan Update
<b>Time:</b>	9:00 a.m.	<b>Location:</b>	Unincorporated County
<b>Agenda Item:</b>	#1	<b>General Plan:</b>	Various
<b>Appeal Status:</b>	N/A	<b>Zoning:</b>	Various
<b>Applicant/Owner:</b>	County of San Diego	<b>Community:</b>	All
<b>Environmental:</b>	N/A	<b>APNs:</b>	Various

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## A. EXECUTIVE SUMMARY

### 1. Introduction

On January 13, 2021, the County of San Diego (County) Board of Supervisors (Board) approved new policy guidelines for the Climate Action Plan (CAP) Update. Specifically, Board direction to the Chief Administrative Officer was to develop a comprehensive and legally enforceable CAP that meets and exceeds the California Global Warming Solutions Act of 2006, or Senate Bill 32, which calls for greenhouse gas (GHG) emissions reductions of 40% below 1990 levels by 2030. Board direction also included establishing actions to meet a goal of net zero carbon emissions by 2035-2045 (in line with Executive Order B-55-18, which has a goal to make the state of California carbon neutral by 2045 while ensuring utilities provide customers with 100% carbon-free energy by the same date). Further, the Board directed that the CAP be shaped by community input, use updated data and modeling, and set clear goals and metrics to ensure environmental justice and equity. Finally, the Board direction stated that the CAP should not rely on the purchase of carbon offsets (i.e., the reduction, removal, or avoidance of GHG emissions that compensate for GHG emissions generated elsewhere) to meet reduction targets.

The CAP Update is required as a mitigation measure for GHG emissions associated with existing and new development that is anticipated to occur under the County's 2011 General Plan. The CAP's primary objective is to reduce GHG emissions generated from activities within the unincorporated county and emissions generated by operating County facilities, including County facilities and operations located within incorporated cities (County operations). As part of the inventory process, a new baseline inventory of GHG emission sources from the unincorporated region and County operations will be prepared, along with projections of GHG emissions through 2050, using, in part, updated transportation modeling provided by the San Diego Association of Governments, or SANDAG. New GHG emission reduction targets will be identified based upon State legislated reduction targets and Board direction which establishes a goal of net zero emissions by 2035-2045. As part of the CAP Update, the County will

prepare a revised set of GHG reduction measures (CAP measures) to mitigate emissions from activities in the unincorporated county and County operations emission sources to meet the new GHG emission reduction targets.

The CAP Update process includes preparing a Supplemental Environmental Impact Report (Supplemental EIR) as required by the California Environmental Quality Act (CEQA), which supplements the previous environmental analysis included in the 2011 General Plan Final Program Environmental Impact Report (Program EIR), since it did not consider the impacts of the CAP measures themselves on the environment. CEQA also requires that the Supplemental EIR evaluate alternatives to the CAP Update that would reduce significant impacts from implementing the CAP measures. Alternatives may include policy changes, various combinations of CAP measures that achieve the GHG emissions targets, and in this case, consideration of smart growth alternatives that are intended to significantly reduce vehicle miles traveled (VMT) as required by direction from the Court of Appeal for Division One of the Fourth Appellate District (Appellate Court) in *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467. The smart growth alternatives would propose actions additional to the CAP measures, in this case focusing on reduction of VMT, to help further reduce GHG emissions.

During a future Planning Commission hearing at which the CAP Update will be considered, the Planning Commission will be asked to recommend the CAP Update, its Supplemental EIR, and will have the option to consider recommending a smart growth alternative to the Board. A smart growth alternative may include new programs or process improvements to incentivize residential, commercial, and mixed-use growth within the smart growth boundary area. Some smart growth programs or process improvements would require subsequent implementing actions after adoption of the CAP, which may include additional analysis and environmental review, if the Board adopts the alternative.

Today, staff will present a progress report on the CAP Update and provide an opportunity for the Planning Commission to comment on the recommended general approaches to developing new CAP measures for inclusion in the CAP Update, development of smart growth alternatives for inclusion in the Supplemental EIR, and the approach to public outreach and engagement, with a focus on equity. As the project and environmental review are still in development and further updates will be brought to the Planning Commission prior to its final vote on the CAP Update and Supplemental EIR, this report and any Planning Commission comments in response do not represent a commitment to any particular course of action.

## **2. Requested Actions**

Planning & Development Services (PDS) recommends that the Planning Commission take the following actions:

1. Find that the proposed actions are exempt from CEQA per Section 15061(b)(3) of the CEQA Guidelines because the proposed actions do not commit the County to any definitive course of action and there is no possibility that the activity in question may have a significant effect on the environment. Subsequent actions would be reviewed pursuant to CEQA and presented to the Board for consideration prior to implementation.
2. Receive the presentation for a Climate Action Plan (CAP) Update.

**B. BACKGROUND**

**1. 2011 General Plan**

On August 3, 2011, County Board approved a comprehensive General Plan Update (2011 General Plan). The Final Program Environmental Impact Report (Program EIR) prepared in support of the 2011 General Plan identified contributions to climate change as a potentially significant environmental impact. The 2011 General Plan made modifications to the County's land use through changes to the future development of the County by locating 80 percent of the future dwelling unit capacity in the western third of the unincorporated areas, within the County Water Authority boundary, and reducing the overall planned capacity by 15 percent.

While the 2011 General Plan focused development within the village core areas away from rural areas, the Program EIR studied and proposed mitigation for the environmental impacts from future development allowed in the 2011 General Plan. Consequently, 19 separate mitigation measures were adopted to reduce the greenhouse gas (GHG) emissions of County operations and from activities within the unincorporated county to below a level of significance.

One of the 19 measures, designated CC 1.2, called for the preparation of a Climate Action Plan (CAP). CC 1.2 reads:

“Prepare a County Climate Change Action Plan with an update[d] baseline inventory of greenhouse gas emissions from all sources, more detailed greenhouse gas emissions reduction targets and deadlines, and comprehensive and enforceable [greenhouse gas] emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of this plan will be monitored and progress reported on a regular basis.”

CC 1.2 was incorporated into the 2011 General Plan as Goal COS 20 and Policy COS 20.1.

**2. 2012 Climate Action Plan**

The County prepared and adopted a CAP and related environmental coverage on June 20, 2012. On July 20, 2012, the Sierra Club filed a petition alleging that the County's adoption of the plan violated the California Environmental Quality Act (CEQA) because it failed to adequately consider the impacts of the 2012 CAP itself. The Superior Court ruled in favor of Sierra Club, thus invalidating the 2012 CAP. This decision was later affirmed by the Appellate Court (*Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 115) and the Board rescinded the 2012 CAP on April 8, 2015 (3).

**3. 2018 Climate Action Plan**

PDS, in collaboration with the Departments of Agriculture, Weights and Measures, Environmental Health (now Environmental Health and Quality), General Services, Human Resources, Parks and Recreation, and Public Works, as well as the Health and Human Services Agency, the Air Pollution Control District, and County Counsel, prepared a new Climate Action Plan (2018 CAP). The 2018 CAP included 26

measures that were achievable, enforceable, and measurable to reduce GHG emissions from County operations and from activities within the unincorporated county. On February 14, 2018, the Board adopted the 2018 CAP and Supplemental EIR (2018 SEIR).

Upon adoption of the 2018 CAP and 2018 SEIR, the Sierra Club filed two petitions challenging them (Case Nos. 2012-101054 and 2018-14081). In a separate action, Golden Door Properties, LLC, also challenged the 2018 CAP (No. 2018-13324). On December 24, 2018, the Superior Court ruled that the 2018 CAP is inconsistent with the 2011 General Plan and that its approval did not comply with CEQA. On the issue of general plan consistency, the Superior Court reasoned that a mitigation measure that would require projects seeking general plan amendments to employ GHG offsets that could involve GHG reductions outside of the County violated the 2011 General Plan policy language requiring GHG reductions within the County. The Superior Court further ordered the County to set aside and vacate the February 14, 2018, approvals of the 2018 plan, the certification for the 2018 SEIR, and related actions.

The County appealed the Superior Court's decision. On June 12, 2020, the Fourth Appellate Court issued its decision. (*Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467.) The Appellate Court disagreed with, and overruled, the Superior Court on the issue of General Plan inconsistency. But while the decision affirmed that the GHG reduction measures (CAP Measures) contained within the 2018 CAP are compliant with CEQA, the Appellate Court upheld the determination by the Superior Court to invalidate the 2018 CAP based on deficiencies in the 2018 SEIR. Specifically, the Appellate Court affirmed the Superior Court's decision that the 2018 CAP and 2018 SEIR failed to adequately account for potential environmental impacts of general plan amendment projects due to reliance on mitigation measure M-GHG-1, which allowed for use of offset credits. The Appellate Court also held that the 2018 SEIR should have included at least one project alternative focused on substantially reducing VMT, and that the document failed to adequately address the cumulative impacts of probable future projects requiring general plan amendments. On September 30, 2020, the Board voted 5-0 to rescind and vacate all approvals related to the 2018 CAP, including the 2018 SEIR.

## **C. CLIMATE ACTION PLAN UPDATE OVERVIEW**

### **1. January 13, 2021 Framework**

On January 13, 2021, the Board approved new policy recommendations to guide the preparation of a CAP Update. The recommendations direct the Chief Administrative Officer to:

1. "Develop a Climate Action Plan for the County that is:
  - a. comprehensive and legally enforceable;
  - b. does not rely on the purchase of carbon offsets to meet emission reduction targets,
  - c. uses updated data and modeling;
  - d. sets clear goals and measurable metrics that show how we are ensuring environmental justice and equity;
  - e. is shaped by community input; and
  - f. will meet and exceed Senate Bill 32 GHG emissions reductions of 40% below the 1990 level by 2030 and establish actions to meet a goal of net zero carbon emissions by 2035-2045 (in line with Executive Order B-55-18)."
2. Conduct stakeholder engagement, hold public hearings, and undertake environmental review; and

3. Report back to the Board bi-monthly with progress.

## **2. Mitigation Measure for the General Plan**

The CAP Update is a mitigation measure for GHG emissions associated with existing land uses and new development anticipated to occur under the County's 2011 General Plan. The relationship between the 2011 General Plan and CAP Update is represented graphically in Attachment A. As depicted, the Program EIR evaluates the environmental impacts from implementation of the 2011 General Plan. As part of the mitigation included in the Program EIR, the County is required to prepare a CAP. The CAP Update process includes preparing a Supplemental EIR as required by CEQA, which supplements the previous environmental analysis included in the 2011 General Plan Final Program EIR, since it did not consider the impacts of the CAP measures themselves on the environment. The Supplemental EIR also includes the evaluation of smart growth alternatives.

## **3. Technical Components**

The primary objective of the CAP Update is to reduce GHG emissions generated from land uses and activities within the unincorporated county and emissions generated by County operations. As part of the CAP Update, both County operations and unincorporated county GHG emissions inventories are being updated. For the County operations inventory, internal data is being gathered, verified, and sorted to identify GHG emissions related to activities conducted in the course of County operations such as water and energy use, and fuel consumption. For the unincorporated county GHG emissions, the CAP Update must quantify GHG emissions that result from existing land uses in the unincorporated area for the baseline year, and then project an estimate of emissions anticipated from existing and new development through 2050. Unincorporated county emissions inventories and projections are linked to growth forecasts for the coming decades and largely depend upon population, employment, and housing forecasts. The identification of how many new residential units will be needed to satisfy demand in future years is based on a number of factors including population and employment projections provided by SANDAG, existing capacity for new development in the 2011 General Plan, Regional Housing Needs Assessment allocations, and market and economic considerations. The amount of new development projected through 2050 informs the amount of emissions associated with new population, and allows for a projection of vehicle miles traveled per person, energy and water use per person, and waste generation per person, among other factors. Unincorporated county data is being gathered from various entities including water districts, San Diego Gas & Electric, and CalRecycle.

The updated GHG emissions inventory and projections will use the SANDAG updated transportation model that results from adoption of the San Diego Forward: The 2021 Regional Plan (Regional Plan) to estimate GHG emissions associated with transportation-related (vehicle miles traveled for passenger vehicles) emissions. SANDAG regularly updates regional growth forecasts to project future population and housing in the San Diego region. SANDAG advised the County that the Series 13 forecast, which was adopted in 2013 and uses growth forecasts from 2010-2012 to estimate regional growth through 2050, will be retired permanently in November 2021 as part of the adoption of the Regional Plan anticipated to occur by the end of 2021. Therefore, the County will use the updated Series 14 modeling platform to finalize the CAP Update GHG emissions inventory and projections when it is available.

After completion of the unincorporated county and County operations inventories and projections, new GHG emission reduction targets will also be identified based upon State legislated reduction targets and Board direction to establish actions to meet a goal of net zero emissions in the timeframe between 2035-2045. As part of the CAP Update, the County will prepare a revised set of CAP measures to mitigate emissions from unincorporated county and County operations emission sources to meet the new GHG emission reduction targets.

## **D. ANALYSIS**

### **1. Approach to the Development of GHG Reduction Measures (CAP Measures)**

Developing a robust set of CAP measures to mitigate emissions from unincorporated county and County operations emission sources is at the core of the development of the CAP Update. CAP measures are the series of programs, policies, and initiatives that the County will implement to achieve its climate action goals and meet identified GHG emissions reduction targets.

To ensure that CAP measures will result in real, permanent, and quantifiable reductions in GHG emissions, performance standards and supporting evidence must be defined. The Appellate Court found the 2018 CAP measures to be CEQA compliant, and the County has continued to implement these measures since the adoption of the 2018 CAP on February 14, 2018. Implementation of the 2018 CAP measures resulted in approximately 160,216 metric tons of GHG emissions reductions in 2020, exceeding the 2020 target of 132,205 metric tons of GHG emissions reductions by 21%. 2018 CAP measures will be considered for inclusion in the CAP Update but may be modified following an evaluation of past and anticipated future performance.

To establish actions to seek to meet a goal of net zero emissions by 2035-2045, staff anticipate the need to develop additional new CAP measures. As part of this process, consideration of new CAP measures will include evaluation of the following: availability of reliable data; evidence that reductions are additional (that is, above and beyond those already required by existing local, state, or federal regulations) and not compelled by any other entity or action (e.g., not attributed to existing regulations or other GHG mitigation requirement); and the ability of the County to enforce and monitor the program, policy, or initiative over time.

The process for developing new CAP measures will begin with preparing a vision statement for each of the following GHG emissions sectors included in the County's GHG emissions inventory and consistent with sectors identified in the 2018 CAP: built environment and transportation, energy, solid waste, water and wastewater, and conservation and agriculture. The vision statement will define what an equitable net zero emissions future would look like for each sector.

Following the development of the vision statement, strategies to achieve net zero emissions will be defined by analyzing the activities that result in GHG emissions within the sector. Strategies define high-level goals and serve to focus actions within a sector. Lastly, CAP measures that can result in quantified GHG emissions reductions will be developed. CAP measures will be explored by examining GHG producing activities within each sector and evaluating existing legislation and policies. GHG producing activities that are not covered through existing regulations will be considered as areas of potential new CAP measures. The development of CAP measures will incorporate stakeholder input. The process will

focus on actions that improve environmental justice and equity outcomes, as well as result in complementary benefits such as clean air and water and improved public health.

Finally, these strategies will be put into action through CAP measures that quantify GHG emission reductions from the implementation of County programs, policies, and initiatives beyond what is required by existing state and federal legislation.

For additional information on the workshops and stakeholder meetings related to measure development, please refer to the section below on Outreach and Engagement.

## **2. Approach to the Development of Smart Growth Alternatives**

Adoption of the CAP Update will have to comply with CEQA requirements. One of these requirements is that the Supplemental EIR will evaluate alternatives to the CAP Update that would reduce significant impacts from implementing the CAP measures. Alternatives may include policy changes, various combinations of CAP measures that achieve the GHG emissions targets, and in this case, consideration of smart growth alternatives that are intended to significantly reduce VMT as required by direction from the Court of Appeal for Division One of the Fourth Appellate District (Appellate Court) in *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467.

A smart growth alternative may include new programs or process improvements that would incentivize residential, commercial, and mixed-use growth within a designated smart growth boundary area. The development of smart growth alternatives requires the identification of areas within the unincorporated area that could be considered “smart” places for new development for reasons including, but not limited to, compact, efficient, and environmentally friendly design; proximity to job centers, services, and amenities; and/or presence of mobility infrastructure. The practical effects of evaluating smart growth alternatives as part of the CAP Update project are that the Board can consider the following: where it would like to incentivize growth, if at all; which programs it may want to develop to incentivize growth; and how to better understand the relationship between location of future development and the alignment of policy considerations related to climate goals, housing production goals, SB 743 implementation (requiring potential transportation impacts under CEQA to be analyzed using VMT rather than level of service), wildfire risk, and other long-term planning considerations. While the Appellate Court ruling requires that the Supplemental EIR consider and evaluate smart growth alternatives, the Board has the discretion to determine whether to adopt one of the alternatives as part of the CAP Update project, or not.

If adopted, the smart growth boundary options would be implemented through an overlay, which is a new zoning designation, or “layer” that could be added to a property’s existing zoning. This overlay would designate the underlying properties as being eligible for future development incentives such as fee waivers, application streamlining, and other process improvements as well as new programs that would help incentivize growth. A smart growth alternative could also include increases in residential density, known as “up-planning” or reductions in residential density, known as “downplanning,” if directed by the Board. If a smart growth alternative were adopted, this action would require subsequent implementing actions that could include amendments to the General Plan land use map and Zoning Ordinance and would require additional analysis and environmental review subsequent to the CAP Update hearings.

Future growth outside of the smart growth boundary could also be disincentivized if the Board chose to include General Plan changes to incorporate policies to further regulate growth in areas of the County that may have greater GHG impacts. As part of this action, the Board could direct new GHG, VMT, or wildfire mitigation requirements that, by adding costs to new development, might make future growth in affected areas less financially viable or feasible, while ensuring environmental impacts of development outside smart growth areas are adequately mitigated.

The smart growth alternative options are being developed through extensive public outreach and participation, and County staff anticipates including more than one smart growth alternative in the Supplemental EIR for the Board's consideration. County staff and consultants began outreach on developing smart growth alternatives with the December 10, 2020, release of the Notice of Preparation (NOP). The County held an NOP Scoping Meeting on January 28, 2021 and invited the public to provide input on the CEQA scope, including the content of a smart growth alternative. The County held a CAP Update public workshop on April 21, 2021 and invited the public to engage directly with staff to prepare a smart growth alternative. The County held a CAP Update focused Smart Growth Alternatives public workshop on June 30, 2021, and received feedback about potential smart growth areas, incentives, and disincentives. The County has also met with community members, industry, and environmental groups to provide input on what they think a smart growth alternative should include. The County will continue meeting with smaller, focused groups from the community, industry, and organizations to receive input.

## **E. OUTREACH AND ENGAGEMENT**

The CAP Update will be shaped by robust community input solicited from diverse stakeholders throughout the unincorporated county. County staff have actively sought, and will continue to actively seek, to engage and solicit feedback from diverse stakeholders, including community-based organizations, advocacy groups, business and industry organizations, professional and labor-focused organizations, agency partners, non-profits, and community residents.

### **1. Notice of Preparation (NOP)**

On December 10, 2020, as noted above, the County issued a public NOP to inform the public of the preparation of the CAP Update and Supplemental EIR and to seek input from the public and agencies on the potential environmental impacts of the CAP Update, ways to mitigate those impacts, and alternatives that may lessen those impacts. Through the NOP scoping period, the County also sought input on potential CAP measures to be included in the CAP Update. Comments on this NOP document were accepted for 57 days following the issuance of the first notice, with the comment period closing on February 4, 2021. The County received 76 written comments from a variety of businesses, environmental agencies and groups, tribal entities, community planning and sponsor groups, and individual residents and stakeholders throughout the region. Staff is considering these written comments as it develops the Supplemental EIR, CAP measures, and related technical appendices. Comment themes included transportation and land use, energy use and utilities, biological resources, GHG reductions through carbon sequestration (i.e., the process of removing carbon dioxide from the atmosphere through natural processes like photosynthesis), wildfire risk, tribal cultural resources, environmental justice, GHG baseline and projections, CEQA mitigation, CAP measures, general plan amendments, and complementary benefits such as clean air and water and improved public health.



## 2. Workshops

Staff have conducted six large-format virtual public workshops and have conducted over 83 consultations with stakeholder groups in diverse settings. Workshop flyers and registration links were noticed through the CAP email list, which includes over 17,000 emails addresses. The virtual NOP Scoping Meeting took place on January 28, 2021, and drew 165 attendees from the public, regional agencies, and non-profits. On April 21, 2021, a second virtual workshop drew 99 attendees and provided an additional opportunity to cover high-level objectives for the CAP Update and to introduce project components. Feedback was collected using an interactive polling format.

An equity-focused virtual public workshop occurred on June 2, 2021. The event drew 60 people and acted as a platform for discussion for the inclusion of equity in the CAP Update. Throughout the workshop, attendees participated in the discussion through interactive polling questions, and staff answered questions throughout the presentation and during an open discussion session at the end of the event.

Staff held a smart growth alternative-focused workshop on June 30, 2021. This workshop hosted 32 participants who provided input on the areas in the unincorporated county that they considered smart growth. Additionally, participants provided feedback on potential incentives and disincentives to encourage development in smart growth areas.

To date there have been two dedicated outreach efforts related to CAP measure development:

- July 28, 2021: Energy, Water & Wastewater, and Solid Waste. This workshop included 28 participants who wrote 13 questions for the Q&A portion and answered the presentation's 15 poll questions related to the energy, water, and waste emissions reduction sectors. Poll questions asked what should/should not be considered for the emissions reduction sector to achieve a net-zero emissions future and how can equity be considered for the emissions reduction sector while still achieving net-zero emissions. Major comment themes included equitable access to energy, water, and waste utilities, high density housing near services and jobs, incentives for resource use reduction, and educational components to help realize these goals.
- August 25, 2021: Built Environment & Transportation. This workshop included 34 participants who wrote 26 questions for the Q&A portion and answered the presentation's 5 poll questions related to the built environment & transportation emissions reduction sector. Poll questions included what should/should not be considered for the emissions reduction sector to achieve a net-zero emissions future and how can equity be considered for the emissions reduction sector while still achieving net-zero emissions. Major comment themes included land use decisions, transportation infrastructure, green buildings, and general equity and quality of life considerations. Many participants vocalized their opposition to urban sprawl and road expansions, suggesting infill development instead. Transportation infrastructure issues included incorporating active transportation and slow streets, as well as increasing public transit frequency and EV charger availability. Participants expressed the importance of green guiding standards and practices, particularly for multi-family residences. While equity was brought up during all discussion areas above, general comments surrounding equity included improving

quality of life for disadvantaged and frontline communities by providing services such as high-speed internet, increased tree canopy, and air quality monitoring infrastructure.

A third workshop will be held on September 29, 2021, and will cover Agriculture & Conservation. This workshop will provide an overview of CAP Update project components and sources of GHG emissions for this sector. Input will be solicited through a series of interactive poll questions and a discussion forum.

### **3. Environmental Justice and Equity**

To ensure equity is centered throughout the CAP Update, staff is building upon and using existing County initiatives and tools to understand better how to reach underserved communities and stakeholders who have not traditionally participated in the planning process. These initiatives and tools include the County's Strategic Plan, Health and Human Services Agency's (HHS) 2018 Demographic Profiles, the draft Environmental Justice (EJ) Element of the County's General Plan, which identifies EJ communities in the unincorporated county, the Vulnerability Assessment and Adaptation Report, which identifies the unincorporated county's exposure to climate change effects, and Community Analyst Tools such as Esri's 2020 Demographic Profiles, which provides geographic context for demographic data from the unincorporated county.

Additionally, staff is utilizing the framework recommended in the California Adaptation Planning Guide prepared by the California Governor's Office of Emergency Services. This framework identifies three ways to incorporate equity into the planning process: procedural, structural, and distributional. Procedural equity refers to the creation of processes that are transparent, fair, and inclusive. Structural equity refers to assessing underlying structural and institutional systems at the root of social and racial inequities by working with communities to anticipate and prevent future unintended consequences. Distributional equity refers to prioritizing resources to communities that experience the greatest inequities and have the most unmet needs. This inclusive strategy provides a framework for ensuring that equity is focused throughout the CAP Update process and provides multiple opportunities to hear from communities about how climate-related issues affect the county's most vulnerable communities.

Staff will be using various platforms to engage a diverse stakeholder base, focusing on reaching the unincorporated county's underserved communities and those stakeholders who have not traditionally participated in the planning process. Planned engagement will include the use of virtual large format public workshops, project website updates, social media campaigns, pop-up outreach events, multi-platform surveys, and in-person events as feasible. Focused discussions that include smaller group dynamics include stakeholder interviews, presentations to the community, business, special interest groups, etc. Staff is also developing new methods to reach broader audiences, such as language accessible materials and interactive content, including videos and polling questions. Recognizing that some residents may not be willing and/or able to access digital materials, staff will incorporate in-person engagement strategies.

## **F. RECOMMENDATIONS**

PDS recommends that the Planning Commission take the following actions:

1. Find that the proposed actions are exempt from CEQA per Section 15061(b)(3) of the CEQA Guidelines because the proposed actions do not commit the County to any definitive course of action and there is no possibility that the activity in question may have a significant effect on the environment. Subsequent actions would be reviewed pursuant to CEQA and presented to the Board for consideration prior to implementation.
2. Receive the presentation for a Climate Action Plan (CAP) Update.

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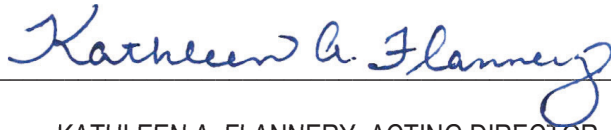
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AUTHORIZED REPRESENTATIVE:



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**ATTACHMENTS:**

Attachment A – General Plan Summary of Actions

Attachment A – GENERAL PLAN  
SUMMARY OF ACTIONS

