

Marin County Climate Action Plan (CAP) 2020 Update

Responses to Key Public Comments on the October 2020 Public Draft CAP

GENERAL COMMENTS/QUESTIONS:

- 1. Provide additional time for community review and feedback on the Draft CAP. Accelerate the timeline for implementation of solutions and push for rapid policy changes and solutions.**

Response: The Draft CAP was posted on October 5, 2020 with notice that the final document would be brought to the Board of Supervisors in December 2020. Due to the desire to adopt the CAP before the end of the year, the deadline for submitting comments for revision period could not be extended, however, the public has been notified that they could continue to submit comments that would be included in the Board packet until November 30, 2020.

- 2. Recommend using stronger language on all measures.**

Response: While the County's intent is to adopt the measures and policies proposed in the CAP, there is still the need to evaluate the costs, GHG impacts, equity impacts, life cycle impacts and feasibility of the measures prior to adopting ordinances and programs. The strength of the language included in the CAP is intended to balance the County's commitment to this work with the need to ensure that all adopted measures are appropriate and feasible but do not result in unintended negative consequences.

- 3. Request that the goal be updated set 2030 as the date to achieve carbon neutrality.**

Response: The goals identified in the CAP are consistent with State and Drawdown: Marin goals and the measures identified, while ambitious, are intended to be achievable for attaining those goals. Aspirational goals are important for stressing the urgency of the crisis but the County would benefit more from a CAP document that clearly identifies the measures that can be implemented to achieve significant reductions. That being said, the targets can be revised as data, state/federal priorities and opportunities evolve. For example, the County's 2020 target, originally set in 2006, was revised in 2015.

- 4. Clarify language around the economic and social diversity of the County as referenced in County profile section.**

Response: The Plan was edited to reflect this comment.

- 5. Accepting the reduction figures given in Table 6, it's our belief that the use of sequestration to lower the amount of emissions does not reflect the intent of the Drawdown Marin goal for 2030, which is stated as a 60% reduction of GHG emissions. Backing off this aggressive emission goal will only make the ultimate 2045 goal of carbon neutral more difficult and less assured. We should start sequestration now, at these and greater levels, but it should be tracked separately from emissions in order to achieve the true and sustainable 'drawdown' in the timeframe that we must. To achieve these mitigation measure reductions, suggest increasing the emissions reductions from LCT-C1 to 96,000 tons and doubling the savings from RE-C3.**

Response: The Drawdown: Marin 2030 goal may be met with mitigation measures only. Specifically, meeting the goal relies primarily on countywide electric vehicle adoption (not just unincorporated areas) and application of manure management practices on farms and ranches, which mitigate existing agricultural emissions. Additional sequestration measures via the development and implementation of carbon farm plans, must be implemented to meet the Drawdown: Marin 2045 goal, drawdown of GHG emissions below zero. Because the current emissions reductions estimates were calculated based on countywide programs, Drawdown: Marin could meet its 2030 goal with mitigation measures only. Additionally, Drawdown: Marin GHG emissions reductions estimates were developed by Stakeholder Collaborative volunteers and may or may not be aligned with existing protocols and best practices.

6. Emphasize the need to have smaller houses to reduce emissions across the supply chain.

Response: Changes to land use strategies or restriction on building sizes would need to come through the adoption of a Countywide plan/general plan amendment.

7. Include language about the importance of buying locally produced food and producing your own food at home or in community gardens.

Response: Updated the “What you can do” sections to include additional actions for supporting local agriculture.

8. My understanding is that the Drawdown Marin solution list is being updated to include icons to help show how the various solutions map to broader categories. Ideally, the categories will line up with the CAP work or easily map (icons may just map to the 6 Drawdown categories). It may be helpful to include a table that does that mapping if the solutions are not as easy to see how they fit into a CAP category. This will be helpful so that as the CAP work progresses, the teams can go back to other Drawdown solutions that may not have been final, but may become more relevant (or get more refined and become viable). Having the clear link between the two efforts is very good and reinforces the work the county is doing and the collective impact efforts and results.

Response: The Drawdown: Marin solutions list was updated to include Drawdown Focus Area icons. For example, the Go100 solution has the Renewable Energy Focus Area icon next to it. Some of the Drawdown: Marin icons align with the CAP icons - Low Carbon Transportation and Consumption-Based Emissions. The CAP has more focus area icons than Drawdown: Marin. The CAP was updated by adding the Drawdown: Marin Focus Area icon to each Endorsed Solution in the CAP.

9. Request changes to the "overall metrics" in chapters 2 & 3, specifically GHG amounts at the starting and end points, and how the various percentages of reduction and GHG levels are calculated.

Response: Text and tables have been added to Appendix D to show 2005-2018 activity data and emissions for each sector.

10. Please include community & school gardens, and urban farms in CAP since growing hyper-local food not only feeds our hungry Marinites, but serves as a carbon sink, especially as compared to turf! It also improves disaster resiliency and reduces food miles.

Response: Updated the “What you can do” sections to include additional actions for supporting community and home gardens.

- 11. Recommendation to include measurement metrics for public review that would identify responsible agencies, timelines of implementation, and actions required to realize the goals. It would be helpful if the strategy charts in each section included: 1) the high-level pathway of implementation achievement (if it is required by any local, state, or federal legislation), 2) estimated costs of the strategy and potential funding sources (grant, public funds, etc.), 3) timeline of implementation, 4) actions needed to realize the goal (ex. Ordinance, community partnership, etc.), 5) ease of implementation, and 6) the target GHG reduction goal.**

Response: As climate programs, technologies, partners and funding resources are ever evolving it was determined that annual assessments of progress and implementation plans would allow for more responsive and flexible implementation strategy. Staff will create annual priorities list for implementation with the first one expected in early 2021.

- 12. Regarding hydrofluorocarbons, why is this not addressed in the Draft CAP (p. 4). Have the grocery stores in Marin been assessed regarding leaking or inefficient refrigeration?**

Response: We do not have the data needed to quantify emissions from leaked refrigerants. In order to do that, we would need to know the number and type of each piece of equipment (refrigerators, air conditioners, etc.) and the amount and type of refrigerant used in each. Clarifying text has been added and Table 1 has been revised to add the other fluorinated gases (perfluorocarbons and sulphur hexafluoride).

- 13. Appreciate the acknowledgement of the land and its original stewards. We would like to better understand the outreach and engagement with indigenous communities as the Draft CAP was developed, and if the land acknowledgement was approved by the Federated Indians of Graton Rancheria?**

Response: The CAP pulls from Drawdown: Marin, which did engage the Federated Indians of Graton Rancheria (FIGR) in their process. The acknowledgement was shared with FIGR. However, feedback was received after the draft CAP was posted. Revisions have been included in the final CAP.

- 14. Request the addition of a scorecard for the implementation of the 2015 Climate Action Plan projects and status of implementation (implemented, not implemented, in progress, failed, etc.). We were unable to find a past score card of Climate Action Plan strategies and success rates. It would be helpful for an annual report to be posted online for public review.**

Response: A [2015 CAP Implementation Tracking](#) summary was posted to the County's Climate Action Plan website which shows activity and progress on measures included in the 2015 CAP. Annual GHG Assessment reports are also posted to the [County climate website](#). This will continue with the 2020 CAP.

- 15. Regarding “supportive” actions, how is it possible to track these without any measurement criteria (e.g. p. 27 & p. 33)?**

Response: See above

- 16. Would like to better understand the County’s efforts to include diverse communities in the planning process. In unincorporated West Marin, there were not any public meetings concerning the Draft CAP. The Draft CAP review meetings took place near Marin County offices and not in the communities that the Draft CAP would directly impact. The February 2020 workshop conflicted with a Coastal Communities meeting in Stinson Beach causing West Marin members to choose between meetings.**

Response: As the CAP drew heavily on the community engagement work of Drawdown: Marin and its 150 volunteer members from diverse organizations and areas, we were hopeful that all voices were included in the development. The COVID-19 shelter in place also put an end to all in person meetings which posed challenges with the outreach process. We will seek to improve the process, outreach and connection as we move forward with implementation.

17. Is there a communications and collaboration (cross-departmental) plan around the implementation of the Draft CAP?

Response: In 2017, the Board of Supervisors launched a Climate Action Plan Board subcommittee which is comprised of two Supervisors and representatives from County departments with responsibility for implementing the Climate Action Plan, including the County Administrator, Community Development Agency, Department of Public Works, Parks and Open Space, Department of Agriculture, Health and Human Services, and Parks and Open Space. The Subcommittee meets bi-monthly to coordinate on implementation and tracking of the Climate Action Plan.

CONSUMPTION-BASED INVENTORIES QUESTIONS/COMMENTS:

18. Request that the CAP highlight how much of an effect consumption emissions have compared to activity emissions.

Response: The CAP was updated to include clarification that the unincorporated County consumption-based emissions are similar to the average Marin household and provided context of how the consumption-based per capita emissions compare to the activity-based per capita emissions.

19. Clarify the consumption-based emissions language. The sentence “As a comparison, the unincorporated County’s community-wide emissions of 380,318 MTCO₂e works out to about 5.5 MTCO₂e per household” (p. 14) should be clarified or emphasized. It sounds like there is an indication that the households in unincorporated Marin are responsible for significantly less emissions than Marin households generally. It would be interesting to better understand this.

Response: See above.

20. Revise consumption-based emissions section to include annual consumption based emissions inventories and measures focused on addressing this emissions. Revise language and measure targets to make language more forceful to reflect desperate situation we are in. Increase permitting and funding of affordable housing.

Response: Language was added to the Consumption-based inventory section directing the County to continue to investigate and incorporate consumption-based inventories and protocols into annual inventory and implementation planning process. The County continues to explore opportunities to expand affordable housing options in Marin including development of the former Coast Guard property in Point Reyes and an inventory study of potential sites for additional housing near transit and employment centers. This report may be published in late 2020. Also, Governor Newsom signed Executive Order (EO) N-06-19 Affordable Housing Development to address the shortage of housing for Californians. Specifically, this EO addresses communities that do not build their “fair share of housing” and identifies an opportunity to build additional housing on state-owned land, which is often times located in and near urban areas. Interactive maps are available at <https://cadgs.maps.arcgis.com/apps/webappviewer/index.html?id=392e5e687e9041bb8f20e3acc5b211c7>. There are 4 potential sites in Marin totaling 19.93 acres.

- 21. Has the County explored other consumption-based inventory methods beyond Bay Area Air Quality Management District's model? Concerned that the existing method does not adequately calculate the impact of transient occupants of short-term rentals.**

Response: See response above re: consumption-based inventories.

- 22. Regarding individual carbon footprints, it would be helpful to include a hyperlink or additional information where you can assess your current carbon footprint.**

Response: Updated the "What you can do" section to include link to Cool California carbon footprint calculator.

TRANSPORTATION SECTION QUESTIONS/COMMENTS:

- 23. Revise Plan to eliminate recommendations to lease or purchase plugin hybrid vehicles and focus solely on promoting zero emission transportation.**

Response: While all-electric/zero emission vehicles are the preferred alternative and will be strongly encouraged, plug-in hybrid cars may allow certain individuals to transition between internal combustion engine vehicles and "cleaner" cars. Some individuals may not be able to afford all-electric vehicles or one-car households may need a vehicle that can go longer distances than some of the current models. There is no one-size fits all solution.

- 24. In LCT-7 (transportation section), include mention of the potential to build upon lessons learned regarding working from home during COVID.**

Response: The Plan was edited to reflect this comment.

- 25. Request the addition of EV car shares (especially in West Marin), increasing EV infrastructure in public places and multi-family properties and increased emphasis on public transportation. Provide clarification on if the Draft CAP includes transportation emissions from visitors and commercial/industrial activities. Stress the need for safe connected routes for biking for commuters.**

Response: The Plan was edited to reflect this comment.

RENEWABLE ENERGY SECTION QUESTIONS/COMMENTS:

- 26. Focus future County-owned and installed solar in West Marin (rather than San Rafael) as this is important before rural towns can consider microgrids.**

Response: The County of Marin has installed over 1 MW of solar on 10 County buildings including the Nicasio Corporation Yard, West Marin Service Center and Tomales Fire Station in West Marin. Solar has, and will continue to be, a priority for the County when considering upgrades to any County facility. Each site is evaluated for the technical and financial feasibility of solar during the capital improvement process of major upgrades or building replacements.

- 27. Suggest you point out the negative environmental impact of fossil fuel generators and a warning about using that as a strategy.**

Response: The County has published a [battery versus generator flyer](#) that outlines the drawbacks/dangers of fossil fuel generators and stresses the benefits of solar plus battery storage.

28. Request additional detail on the Community Resiliency Hub and suggest including recommendation to use an inverter with an EV during PSPS events.

Response: Additional detail on the Community Resiliency Hub can be found in Appendix A of the CAP and in the Drawdown: Marin Strategic Plan posted on www.drawdownmarin.org. Regarding including language on using an inverter with an EV during PSPS events, technology is still evolving on this action. The County, at this time can't include or endorse recommendations that might void any warranties. However, as the market evolves the information will be shared and encouraged.

29. Include the Drawdown Marin measure regarding in-pipe microturbines for the production of renewable energy.

Response: The Renewable Energy measure RE-C1 was updated to reflect this comment.

ENERGY EFFICIENCY SECTION QUESTIONS/COMMENTS:

30. Request any ordinance language updates to include energy audits that are presented to the Board of Supervisors also require a Residential Resale Report for unincorporated Marin County or at a bare minimum also include a septic system inspection. A program in unincorporated Marin would increase permit compliance and generate funding to support the additional staff needed to conduct and enforce these inspections.

Response: The Plan was edited to reflect this comment.

WASTE REDUCTION SECTION QUESTION/COMMENTS:

31. Clarify the requirements of AB1826 and SB 1383 in the waste reduction section.

Response: The Plan was edited to reflect this comment.

32. Identify ways to expand composting operations within the County, possibility through updates to permitting process, to support agricultural needs for compost and the benefit of diverting green waste. Consider expanding the existing food to energy pilot projects as a local way to convert food waste into useable, locally produced, renewable energy. And include language regarding the need to study and quantify the emissions associated with hauling biomass waste out of the County.

Response: The Plan was edited to reflect this comment.

33. Biomass Study Working Group requests funding assistance for their project as the project directly touches on CAP goals, projects and metrics and will produce information of direct benefit to achieving CAP objectives.

Response: Funding decisions regarding programs and studies will be made as part of the Board of Supervisors' annual budget process. Strategy prioritization and budget recommendations will be made using the CAP Update 2020 for guidance and will be based on several factors including cost effectiveness, emissions reduction efficacy, timeliness, and general benefits to the community.

34. Add to Waste Reduction action WR-C6 - "Item 3: Regenerative Supply Chains. Conceptualize and publish information, including carbon and sequestration metrics, for multi-sector economic solutions (like those developed by the Biomass Study) addressing not just waste recovery but transportation, agricultural lands, energy efficiency, alternative fuels, and buildings. Drawdown Marin endorsed the Biomass Recovery Study anticipating that it would

be part of such a broader circular and regenerative economy. The Biomass Study itself intends to show how to produce bioresources, prevent wildfires and stabilize waste sector operations, while drawing down carbon.

Response: WR-C6 was amended to include "3. Encourage regulatory agencies to require and publish supply chain analysis for projects to determine the upstream and downstream impacts associated with biomass (green waste, wood, compost, etc.), related recovery pathways, e.g. biomass to energy, and impacts on County waste operations and facilities. 4. Consider adopting a County resolution supporting the Buy Clean California Act, which requires the State to develop global warming potential (GWP) limits for eligible building materials, indicating the County will utilize lessons learned from implementation of the Act to further address embodied emissions in local buildings and building materials."

35. Revise WR-C4 to strengthen language to include AB 1826 enforcement, organic curbside collection, and include the lease & rental agreement language from WR-C1. Stress the need to adopt ordinance as soon as possible to meet SB 1383 timeline. MCAP GHG reduction objectives should match or exceed State mandate of 75% diversion of organic waste by the dates SB1383 requires.

Response: The Plan was edited to reflect this comment.

36. Revise the title of WR-C5 to include reference to Franchise Agreements and identify that the feasibility study needs to include GHG reduction metrics, in order to compare relative costs and effectiveness of various infrastructure investments, such as those being considered in the Biomass Study.

Response: The Plan was edited to reflect this comment.

37. The appendix could include a basic recycling guide to avoid "wish cycling" as referenced. The Draft CAP should also reference the Draft Reusable Foodware Ordinance.

Response: Reference to the plan to complete the adoption process of the Reusable Foodware Ordinance was added to the waste section. As recycling guidance can change over time, a full recycling guide was not included in the appendix of the CAP, however a link the Recycle Right Guide was added to the "What you can do" waste section.

WATER CONSERVATION SECTION QUESTIONS/COMMENTS:

38. Suggest adding a measure that promotes residential and commercial water meters or devices that provide real time data so people know when they are wasting water. While the water energy/nexus is included in Appendix A (page A-4), this solution could be included in the Draft CAP itself.

Response: The Plan was edited to reflect this comment.

ADAPTATION AND COMMUNITY RESILIENCY SECTION QUESTIONS/COMMENTS:

39. Encourage the expansion of the Adaptation and Community Resilience section to place greater emphasis on wildfire and other climate impacts, in addition to sea level rise, in developing adaptation plans in Marin – both unincorporated and countywide.

Response: The Adaptation and Community Resiliency section includes language about the threat of wildfires and several of the sub-actions of measure AD-C1 direct the County to take steps to plan and

respond to wildfire risks including integrating climate planning into the Community Wildfire Protection Plan.

- 40. In the Adaptation and Community Resiliency section, it would be helpful to highlight community actions that foster increasing community relationships with second homeowners and to connect existing communities and create an online list of community emergency preparedness groups (that are already coordinating with the County) for property owners to access. Request the addition of a reference to the emerging issue of groundwater concerns.**

Response: Reference to groundwater impacts was added to the list of potential climate change impacts in the Adaptation & Community Resiliency section. Regarding emergency resources, the Marin County Sheriff's Office Emergency Services division (OES) is in the process of developing a Marin Emergency Portal that will provide current emergency information and resources for preparing for future emergencies. The site is currently under construction with expected publication in December 2020. The new site's emergency preparedness page will include listing all available community resources to help residents and businesses prepare for a variety of potential emergencies. This response will be updated with the published link as soon as it is available.

COMMUNITY ENGAGEMENT SECTION QUESTIONS/COMMENTS:

- 41. In the community engagement section, there are two items (CE-C4 Advocacy and CE-C5 Green Businesses), expand measures to include outreach to community groups and local associations who want to educate their own membership about climate change or draw the actions and mitigation strategies into their own work.**

Response: The language for CE-C5 regarding the Green Business program outreach was expanded to include community groups. CE-C4 was not changed as that measure is focused on advocacy of the Board of Supervisors, consistent with their Legislative Platform, at the state and federal level. Additionally, measure CE-C1 specifically directs the County to work with community-based organizations to educate and motivate community members in GHG reduction efforts.

- 42. The recommendation to join a Resilient Neighborhoods team is helpful, although this is not applicable in unincorporated West Marin³. A reference to West Marin Climate Action⁴ would be helpful to add to the Draft CAP. Request the addition of a reference to West Marin Climate Action as an environmental and climate focused group in unincorporated areas of Marin County that participated in the Draft CAP process.**

Response: The West Marin Climate Action group was added to the list of community organizations that participated in the CAP development process. Regarding the question on Resilient Neighborhoods teams including West Marin households, residents from all portions of Marin County, including West Marin, are encouraged to form teams and participate in the Resilient Neighborhoods program. We strongly encourage West Marin residents to sign up via the program to form teams.

- 43. Provided suggestions for updates to sections referring to Resilient Neighborhood programs to improve accuracy about program titles and offerings.**

Response: The Plan was edited to correct the references to the Resilient Neighborhood program.

AGRICULTURE AND WORKING LANDS SECTION QUESTIONS/COMMENTS:

- 44. Provide incentives and certification systems for agricultural producers to implement the improved practices outlined in the CAP. Expand "what we can do" section beyond just "eat less meat" to include buying from local low carbon producers.**

Response: The County has updated the "What you can do" section to add nuance to suggestions to eat less meat. Carbon Farm Plans serve as the central mechanism to implement the improved practices in the CAP. These plans are well researched, with a robust network of local partners to support development and recorded interest among producers in the unincorporated County. Incentives are a crucial part of achieving the targets identified in the Agriculture chapter and in the whole CAP, and the County will continue to work to identify funding sources to support this.

- 45. Provide additional resources and incentives to the agricultural community to incentivize ecological practices on working lands including the development of an Ecological Service contract and token system to credit and incentivize property owners to implement carbon farm plans.**

Response: The Carbon Farm Plans described in measure AG-C1 have numerous ecological benefits when implemented, including habitat creation, water quality protection, and carbon sequestration. Identifying creative solutions, such as those suggested in this comment, to fund and support implementation of Carbon Farm Plans is essential to achieving targets, as outlined in AG-C1. Identifying innovative funding solutions such as those mentioned in this comment will be part of the County's annual implementation planning process.

- 46. It is good to show the overall impact of ag emissions in the county versus unincorporated lands only. It would be impactful to also show visibly how much Ag can be a huge opportunity for sequestration. I'd like to see some stronger statements demonstrating the potential impact of the ag solutions.**

Response: The overall potential for carbon sequestration in the CAP is demonstrated in the Agriculture chapter, but this potential is not shown against the overall emissions because the chapter strives to focus on what the County and partners think is attainable within the CAP timeframe. Multiple programmatic and funding barriers exist to Carbon Farm Plan development and implementation, and addressing those is the central goal of this chapter.

- 47. AG-C3 mostly talks about tree planting, but item 6 mentions community gardens on public and private lands by community groups. Would like to consider at a minimum changing the title to not just imply forestry. Or, separate Urban Ag for food production into its own group as a land management activity, but also as a way to promote more locally grown food and reduce food waste.**

Response: The Plan was edited to reflect this comment.

- 48. Request clarification on the importance of solutions other than just carbon farm planning and correction of potential miscalculations in potential acreage available for such strategies.**

Response: Compost application has been well researched in our County and does offer substantial potential for carbon sequestration. A Carbon Farm Plan represents a well-balanced plan with multiple solutions for land managers to increase carbon sequestration and provide ecological services. Calculations of potential are meant to show the complete physical potential of carbon sequestration in

Marin, but the measures in this chapter do not estimate that all of this potential will be achieved by 2030.

49. Request clarification of compost of rangelands and croplands strategy. Request revision/clarification of the Map of Potential Compost Application Areas. The map includes federal and other public lands which have more limited areas available for compost application than the map indicates.

Response: The map intends to show all of the lands to which compost could be applied based on zoning and current grazing activity. This doesn't take into consideration policy barriers such as those that exist in certain regions of the PRNS. The CAP doesn't assume that compost is applied on all of the lands in the map, but rather seeks to illustrate the total potential and then establish a target within the Plan's timeline to achieve (~30% of sequestration potential). Implementation is likely to happen on lands with fewer regulatory barriers and additional financial resources for implementation.

50. Request more emphasis on protecting riparian corridors based on the rate of GHG sequestration and the multiple co-benefits that include 1) creation of habitat, 2) clean water, 3) recharge groundwater sources, and 4) creation of natural windbreaks.

Response: Riparian restoration is an important component of Carbon Farm Plans, and the sequestration potential of this work is one of the most notable of all potential measures. Additional language has been added to emphasize this potential. The CAP does not prescribe specific measures over others, but rather seeks to help the County understand the value and potential of Carbon Farm Planning. The process of developing a Carbon Farm Plan takes into account the potential on that specific parcel, including the priorities of the producer. The Marin RCD works to connect Carbon Farm Planning to water quality regulations for rangers.

51. Recommend adding more discussion around the potential for blue carbon. More state and local carbon assessments for wetlands and estuaries are needed.

Response: The level of detail reflects the County's current understanding of opportunity areas for Blue Carbon. Additional discussion and sequestration potential assessments are recommended to be explored during CAP implementation, as outlined in measure AG-C5.