Proposed Humboldt Regional CAP Modification

October 10, 2023

Summary

Completion of the Humboldt Region Climate Action Plan (CAP) has encountered complications that require attention. Specifically, the consultants hired to conduct the environmental review for the Draft CAP requested supporting information to demonstrate the existing strategies can be achieved. The process of attempting to justify the measures results in the conclusion they are overly ambitious and cannot be achieved. These limitations prevent the Draft CAP from meeting the state requirements for a "qualified" CAP, and the following discussion outlines the issues, provides options for moving forward, and includes a proposal that could result in a qualified CAP.

The Draft CAP is the result of a collaborative effort between the County of Humboldt, the City of Eureka, the City of Arcata, the City of Blue Lake, the City of Trinidad, the City of Ferndale, the City of Fortuna, and the City of Rio Dell to craft a regional approach for addressing the challenges of climate change. This regional approach enables improved coordination and maximizes the effectiveness of GHG reduction measures. Throughout the development process of the draft CAP, all jurisdictions have been included in the conversations around decision making. After consulting with the jurisdiction staff involved in the CAP formation on the issues and potential paths forward, it was collaboratively decided that the following proposal would be brought to the City Councils and the Board of Supervisors for consideration.

Background

A CAP that meets state GHG reduction goals is a "qualified" CAP that provides streamlining for CEQA required GHG impact analysis of future development projects by demonstrating consistency with the CAP. To be considered a "qualified" GHG reduction plan per CEQA Guidelines Section 15183.5(b), a) the CAP must quantify existing and projected GHG emissions over a specified time period within defined geographic area, b) establish locally and regionally appropriate reduction targets that are at least consistent with the State targets, c) identify and analyze sector specific GHG emissions from categories of actions within the geographic area, d) specify measures/actions including performance standards that are supported by substantial evidence that would on a project by project basis collectively achieve the specified emissions level, and e) establish a mechanism to monitor progress and amend the plan if the specified emission targets are not achieved, and f) be adopted in a public process following environmental review.

A qualified CAP provides consistency in implementation of GHG emissions reduction measures, sets the baseline for local expectations, and allows applicants to include the CAP provisions within their proposals. If a CAP is not qualified each new development will need to evaluate impacts on GHG emissions and develop independent mitigation for their impacts. This introduces a significant amount of variability in the implementation of GHG reduction objectives. A qualified CAP is more effective than a CAP that is not qualified because it not only meets state objectives, but has regulatory leverage to require new development and activities to comply with the CAP. An unqualified CAP does not have the same authority over new development projects and would not provide the same effectiveness in GHG emissions reductions in the Region. A qualified CAP also improves opportunities for localities to obtain grant funding to implement climate adaptation strategies.

The GHG reduction model was originally developed by consultant Environmental Indicator Accounting Services (EIAS). Since 2020, staff worked with EIAS and jurisdictions throughout the County to develop specific GHG reduction implementation measures based on the community priorities that were identified

during 2019 community workshops. The measures were vetted over months of review by several staff members. The objective was to provide ambitious but realistic measures that would provide the GHG reductions necessary to meet the state targets. To meet the state targets, implementation measures must demonstrate a 40% reduction of GHG emissions below 1990 levels by 2030 and significant progress towards net-zero emissions by 2045. Staff identified several concerns about meeting the required targets based on the GHG reduction model, given the very ambitious measures it included.

The existing Draft CAP was written to exclude project-level industrial sources of GHG emissions, also known as "point source" emissions, from the baseline 1990 GHG emissions inventory. For this reason, 2015 was chosen as the baseline year. The rationale to exclude point source emissions was that the reduction in industrial emissions was not achieved through the implementation of policies geared towards reducing GHG emissions but was achieved through a decline in the timber resource industry.

Upon completion of the Draft CAP, it was reviewed and accepted by all stakeholder jurisdictions. The intent was to use this draft as the project description for preparation of the EIR. A REAP grant was obtained by Humboldt County Association of Governments (HCOG) to pay for the EIR and a corresponding VMT analysis. The justification for the grant was to facilitate and expedite the development of housing in Humboldt County with the rationale that a qualified CAP would address GHG emissions associated with new development and would remove the need for that analysis on each new residential project. An unqualified CAP requires each project to evaluate its GHG emissions impact, which can be costly and time consuming.

Rincon Consultants, Inc. was chosen as the EIR consultant and after their review of the Draft CAP they asked for background information (i.e., substantial evidence) to justify the measures and targets proposed to reduce GHG emissions. Rincon's scorecards on the measures listed in the Draft CAP are included as Attachment A. This began an analysis of the Draft CAP's measures which revealed that the measures were written to accomplish the state goals for GHG emissions reductions without consideration of whether the goals could be achieved. As the measures were re-evaluated and redefined it became clear that the result would be a CAP that is not qualified. The initial approach in re-evaluating the Draft CAP was to reassess the numbers, determine the difference is between a qualified CAP and the current draft with measures that are supported, and then evaluate whether additional measures could be added to achieve a qualified CAP. This approach has been deemed to be infeasible.

A list of measures with weaknesses in the Draft CAP is included as Attachment B. Examples of how the Draft CAP overestimates its measures is seen in the objective to convert to Zero Emission Vehicles (ZEV) and in the objective to convert existing homes to all electric. As part of the analysis to provide substantial evidence that the goals of the Draft CAP were achievable, it was important to tie the goals to accepted sources of information. Related to ZEV's, the California Air Resource Board's (CARB) Advanced Clean Cars II rule provides a roadmap so that by 2035 100% of new cars and light trucks sold in California will be ZEV's. It establishes interim targets of: 35% of cars sold statewide in 2026 will be ZEV's, and 68% of cars sold in 2030 will be ZEV's. Data for ZEV's sold in Humboldt County between 2020-2023 was collected and analyzed, along with data from the DMV for registered passenger vehicles in Humboldt County, to project ZEV's in Humboldt County by 2030. The results were then compared to the target specified in the Draft CAP. Following the CARB interim targets show it is likely that 11,415 ZEV's would be sold during the Draft CAP time frame. Based on this the Draft CAP's target for 34% ZEV (18,301 ZEV's) ownership of passenger vehicles in Humboldt County by 2030 is overestimated and not achievable. This is reflected graphically in Attachment C.

Additionally, the Draft CAP's target for complete electrification of homes is 26% by 2030 (14,293 homes). This requirement would need to be tied to something triggering of the conversion such as sale of the home or issuance of a building permit. Using the County as an example, there are approximately 27,000 units which is approximately half the homes in the County. This goal is beyond reach. Looking at Building Permits and home sales, on average the Humboldt County Planning & Building Department receives approximately 300-400 remodel applications and 300-400 transfers of sales per year. There would be a maximum of 800 opportunities per year to potentially require 100% electrification. Over a period of seven years that would only result in a total of 4,800 homes being completely electrified. The County's share of this goal would be approximately 7,000 homes. This leaves a gap of approximately 2,200 units that still would need to be electrified. This is compounded by the reality that a percentage of the County is within rural areas where electricity is not currently available, and people live off grid. In addition, a decision needs to be made as to when complete electrification will be required. Should the measure require electrification for any home transfer which may be financially infeasible for more affordable units? Should complete electrification be required for issuance of Building Permits associated with minor repairs? At what level is complete electrification required? These are only two examples of the many measures and targets in the Draft CAP that lack substantial evidence to show how they could feasibly be achieved by 2030.

Unfortunately, the facts and science contained within the existing draft do not allow the CAP to reasonably achieve a qualified status. There are not funds currently available to pay for an EIR that is not qualified, therefore a change in approach and funding is necessary to either reach a qualified CAP or accept a CAP that is not qualified.

A key issue is that grant funding from the HCAOG for preparation of the CAP EIR cannot be used for a CAP that is not qualified. The grant for preparation of the EIR is based on enabling the approval of housing. This only occurs with a qualified CAP which removes the need for proposed development projects to evaluate their GHG emissions under CEQA.

To address this situation a proposal was requested from the EIR consultant to resolve the vulnerabilities of the current Draft CAP, included as Attachment D. Doing this will involve redoing and rethinking some work for the CAP and will cost both time and money. The grant funds currently dedicated to preparation of the EIR can be reallocated to make improvements to the CAP such that it will be qualified and will use the most current methodologies and science to address the climate crisis. Additional funds will need to be found to complete the environmental work, but the priority is to achieve a qualified CAP. It has become apparent that there is not a viable path forward for the current Draft CAP.

Proposal

In order to achieve a qualified CAP the proposal is to redirect the funds allocated for preparation of the EIR to Rincon to revise portions of the CAP. An important concept in achieving this is to right size the Greenhouse Gas Inventory, forecast, and targets. State guidance recommends focusing the inventory, forecasting and target setting on emission sources that a jurisdiction can have influence over through developed strategies. While the existing inventory does exclude point sources from past industrial output, it also includes other GHG emissions that the local jurisdictions have limited control over. Once the inventory is appropriately sized, measures can be tailored to achieve the appropriate reductions. This does not include using point sources as part of the Inventory. This would involve Rincon taking the following actions:

1. Update the GHG Inventory. This would be from community wide data as of 2022 and include sources of emissions that the County and incorporated cities have influence over.

2. Update the Forecast. The current forecast does not contain the state policies that are considered best practice to include or exclude. The Rincon team will utilize their forecasting tool to update both a business-as-usual (BAU) forecast and an adjusted forecast (which includes reductions from state legislation) of expected emissions broken down by emissions sector for specific future years, such as 2030 and 2045.

3. Update Target Analysis. Rincon will work with the jurisdictions to identify targets that are practical, defensible, and consistent with current state legislation, including SB 32 and the newly signed AB 1279. Rincon will produce both per capita and mass emission-based targets for the review.

4. Measure Development. Rincon will work to 1) revise existing measures such that the goals are well supported with the developed actions; 2) assess any policy or program gaps and identify additional opportunities for emission reductions and new measure development; 3) develop targeted approaches that are differentiated specifically for municipal and rural areas of the county; 4) quantify the GHG reduction potential of the revised and new measures and provide documentation of the substantial evidence supporting the strategy.

5. Scenario-Planning for GHG Reduction Strategies. Rincon will begin by inputting the current strategy goals into their Scenario Planning and Reduction Quantification (SPARQ) tool. The SPARQ tool calculates GHG reduction potential based on the established goals and using standard substantial evidence. The GHG emission reduction potential is then compared to the adjusted forecast and established target to demonstrate the emissions that would need to be reduced by additional action or increased implementation of established actions to reach the target.

6. Revised Measures and Action List. Based on the above criteria and the existing measures and actions of the Draft CAP, Rincon will develop a draft list of revised/new GHG reduction measures and actions that will act as a roadmap and align with the County's GHG reduction targets for the established target years. The measure and action list will include the recommended County and/or incorporated City involvement (e.g., role, department lead), linkages to existing plans, codes, or activities, and the identification of interested parties, community-based organizations, and partners essential to the successful implementation.

7. Measure Quantification and Substantial Evidence Documentation. Rincon will also provide the necessary substantial evidence to support the quantification of each strategy, measure, and action. Providing substantial evidence to support the developed strategy is critical to the defensibility of the CAP and to demonstrate how the CAP will meet the established targets and ultimately be a qualified GHG reduction plan per CEQA guidelines.

8. Interagency Engagement. Rincon will work with staff from each participating jurisdiction.

9. Community Engagement. Two community workshops will be held.

This will take between 4-6 months of time and cost up to $127,000. At the end of this effort, we expect to have a revised CAP document that will meet all required criteria to be qualified. If we do not modify our approach at this time, the result can only be an unqualified CAP.

Attachment A

Draft CAP Measures

Scorecards from Rincon

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
Goal 1 – Transition transportation systems and mobile sources from fossil fuels to renewable fuels								
Strategy 1.1 – Provide infrastructure and incentives for electrification of passenger vehicles								
Objective 1.1.1 – Public Light Duty BEV Adoption	Implementation Measure 1.1.1.1 – Promote purchasing of electric vehicles through outreach	2030	28,165	RCEA and Schatz Energy Research Center. 2016. Northwest California Alternative Fuels Readiness Plan. https://redwoodenergy.org/wp-content/uploads/2019/02/Northwest-California-Alternative-Fuels-Readiness-Plan.pdf -	RCEA RePower Plan goal to accelerate EV adoption from 6,000 in 2025 to 22,000 EVs in 2030 -	**Limitation:** As written, the implementation actions do not support an increase adoption of EVs from 1% to 34% by 2030. The established goal exceeds the RCEA objective for entire County and relies heavily on education and incentives to enact change – this is not enforceable and does not provide strong enough support to demonstrate how the EV adoption will increase over 1,000%. **Recommendation:** Right size goal based on actions or modify actions to support such an aggressive goal and identify similar projects or County measures to demonstrate the feasibility. Include land use incentives or discentives to encourage the shift to EVs (such as coordinating with jurisdictions to adopt a preferred parking ordinance for EVs, or	Increase in EV adoption from 1% (~1,800) to 34% by 2030 (~17,652). -	
	Implementation Measure 1.1.1.2 and 1.1.1.3 – Provide incentives for EV adoption	2030						

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						no longer permitting new gas stations), identify funding or partnerships to support measure, conduct a feasibility study to identify barriers to EV adoption and develop a plan to address those barriers.		
	Implementation Measure 1.1.1.4 and 1.1.1.5 – Install public and workplace L2 and L3 charging stations	2030	Not quantified	Idaho National Laboratory. Plugged In: How Americans Charge Their Electric Vehicles. https://avt.inl.gov/sites/default/files/pdf/arra/PluggedInSummaryReport.pdf	-	**Limitation:** 1) There is not substantial evidence supporting that there are resources or the enforcement to increase the number of L3 chargers from 5 to 83. The number of existing L2 chargers was not defined so it is unclear if the RCEA network expansion would achieve the goal of ~2,500 L2 chargers installed. 2) The dates for the energy code update, adoption of the ordinance, and implementation of the North Coast Plug-In Vehicle Readiness Plans has not been established. 3) There is not sufficient details regarding what the	Install 2,486 L2 chargers and 83 L3 charging stations	

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						energy code and ordinances include to support the installation of ~2,500 public chargers. 4) It is not clear who will fund or install the light utility pole chargers. **Recommendation:** Right size goal with EV penetration [general recommendation I 1 charger per 10 EVs]. As part of implementation actions specify when the building code would be updated when the ordinances would be adopted, and include specifications of the energy code and ordinances to demonstrate how the energy code/ordinance would be implemented (e.g., how many chargers per number of employees?). Establish how many existing L2 chargers there are, to what extent RCEA plans to expand the network, and how many office/commercial buildings there are to support the installation of this number of chargers. Identify		

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						partnerships and funding to be established or relied on for implementation (i.e., RCEA). Include incentives for employees to use work chargers – such as working with local businesses to establish preferred parking for EVs.		
	Implementation Measure 1.1.1.6 – Install home EV charging infrastructure	2023	Not quantified	-	-	**Limitation:** Installation of ~5,000 home chargers is not supported by substantial evidence. 1) The number of chargers to be installed is ~45% greater than the estimated number of new residences (~3,400) indicated by the General Plan + RHNA values provided. 2) The dates for the energy code update and adoption of the ordinance has not been established. 3) There is not sufficient details regarding what the energy code and ordinances include to support the installation of ~5,000 home chargers.	Install 5,296 home charging plugs by 2030	

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						Recommendation: As part of implementation actions specify when the building code would be updated when the ordinances would be adopted, define major remodels (e.g., over $50,000 in cost), and include specifications of the energy code and ordinances to demonstrate how the energy code/ordinance would be implemented. If the goal is to install more home chargers then the number of new residences anticipated, provide substantial evidence/detailed implementation actions to demonstrate how that will be achieved.		
Objective 1.1.2 – Encourage public light duty FCEV adoption	Implementation Measure 1.1.2.1 – Promote Public Adoption of FCEVs					**Limitation:** Measure is unclear and lacks specificity. How does a fleet commitment promote adoption of public FCEVs? **Recommendation:** Provide context of how measures support public adoption of		

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						FCEVs through example projects, or references.		
	Implementation Measure 1.1.2.2 – Install hydrogen fueling stations to support light duty vehicles	2025	5,871	Redwood Coast Energy Authority et al. 2017. Regional Hydrogen Readiness Plan. https://redwoodenergy.org/wp-content/uploads/2017/08/10_19_17.FINAL_FCEV_Infrastructure_Plan.pdf		**Limitation:** The supporting actions are focused on outreach and feasibility assessment. There is not a structural component or identified funding sources to permit 7 hydrogen stations. There is not substantial evidence supporting how 7 hydrogen stations support the purchase of 649 hydrogen vehicles used to quantify the GHG reductions. **Recommendation:** Provide substantial evidence (e.g., existing studies or example projects) to demonstrate how installation of hydrogen stations will lead to the purchase of 649 hydrogen vehicles by the public. Include additional actions addressing funding, structural changes, partnerships, etc. that will lead to the obtaining these 7 stations.	7 hydrogen stations (649 hydrogen vehicles)	

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
Strategy 1.2 – Transition to a carbon-neutral goods-movement system								
Objective 1.2.1 – Encourage public light duty FCEV adoption	Implementation Measure 1.2.1.1 – Convene a Freight/Offroad Electrification Working Group		Not quantified	California Air Resources Board. 2019. Advanced Clean Trucks Fact Sheet. https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet	-	**Limitation:** The measures lack specificity and substantial evidence to demonstrate how 489 vehicles will be purchased. It is unclear if the 268 installed charging stations is in addition to the previously established charging station goals or is a subset of those stations. Measure does not reference Advanced Clean Fleets Rule. **Recommendation:** Expand the supporting actions to include specific actions on how fleets or vehicles will be identified for replacement (e.g., conduct a feasibility study to identify fleets to target for electrification, establish a timeline for replacement and tracking mechanism, investigate opportunities for enforcement such as an ordinance at the City level or unincorporated County). Include	-	
	Implementation Measure 1.2.1.2 – Incentivize accelerated zero-emission freight ahead of advanced clean truck adoption rates		8,013				489 EVs purchased to replace trucks	
	Implementation Measure 1.2.1.3 – Install "on-route" charging stations for battery electric heavy duty trucks		Not quantified				Install 268 charging stations	
	Implementation Measure 1.2.1.4 – Install hydrogen fueling for fuel cell electric heavy duty trucks		Not quantified				-	

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						substantial evidence such as an example project or study or detail the assumptions/calculations demonstrating that to meet the Advanced Clean Fleets Rule that 489 vehicles would be replaced given the total number of vehicles that need to be replaced. Include specifics regarding how incentives would be applied. Reference the Advanced Clean Fleets Rule.		
Strategy 1.3 – Decarbonize municipal fleets								
Objective 1.3.1 – Electrification of Light Duty Municipal Fleet	Implementation Measure 1.3.1.1. – Install fueling infrastructure	Not specified	-	-	-	**Limitation:** The measure lacks specificity and timeframes to decarbonize municipal fleets and does not align with the Advanced Clean Fleet Rule requirements. **Recommendation:** Update the measures and actions to reflect the Advanced Clean Fleet Rule requirements and to include specific timeframes for fleet decarbonization.	-	
	Implementation Measure 1.3.1.2. – Replace high mileage vehicles with BEVs	Not specified	238	-	-		724,612 electrified miles	
	Implementation Measure 1.3.1.3. – Replace high-mileage vehicles with FCEVs	Not specified	38	-	-		299,332 electrified miles	

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						Include reference to Advanced Clean Fleet Rule to support the achievement of this measure as substantial evidence		
Strategy 1.4 – Work with Humboldt Transit Authority to decarbonize public transit								
Objective 1.4.1 – Achieve and exceed statewide transit electrification targets	Implementation Measure 1.4.1.1. – Install fueling infrastructure	Not specified	-		-	**Limitation:** The implementation actions lacks specificity to demonstrate how this measure will be achieved. The measure lacks context in terms of the percent that this measure is exceeding the ICT requirements already accounted for in the Legislative Adjusted Forecast. **Recommendation:** Update the actions to establish a clear plan for achieving this measure goal, such as conducting a feasibility study to identify where fueling infrastructure should be located, identification of funding or grant opportunities to obtain the buses, development of a transition plan that prioritizes which buses to replace first and	-	
	Implementation Measure 1.4.1.2. – Purchase battery electric buses	Not specified	265		-		16 electric buses	
	Implementation Measure 1.4.1.3. – Purchase fuel cell electric buses	Not specified	397	California Air Resources Board Innovative Clean Transit Rule. https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit - -	-		24 fuel cell electric buses	

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						when replacements will happen. Providing context or the percent to which the measure aims for state ICT targets to be exceeded will give the reader clarity on the emission reductions calculated (i.e., upon initial glance it appears that the reductions for this measure are quite low – however understanding that reductions are tied just to the exceedance of the state ICT legislation makes the values make sense.		
Strategy 1.5 – Promote biofuels as a transition strategy								
Objective 1.5.1 – Increase Consumption of Renewable Diesel	Implementation Measure 1.5.1.1. – Increase use of renewable diesel	Not specified	2,551	-	-	**Limitation:** Multiple tracking metrics are listed however, the calculations are based on the gallons of RD that replaces traditional diesel. The GHG reduction calculations are based on the maximum amount of renewable diesel that could be produced in the County based on population and cattle population - this calculation is fully	277,352 gallons of renewable diesel sold	

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						hypothetical and is not tied to actual RD production or sales occurring in the state or County. The % of diesel to be replaced by RD would be better supported by the state or regional trends related to RD in the total diesel pool. Implementation actions lack specificity of how they will result in 277,352 gallons replaced. **Recommendation:** Simplify the tracking metrics to just the gallons of RD sold and use the other metrics (e.g., 36 gas stations in the County supply renewable diesel) as part of the substantial evidence in the implementation action. Include the references for these metrics and include how many gas stations in total there are in Humboldt County that sell diesel to indicate the % of stations that provide renewable diesel. Clarify in metric language that the RD sold is replacing		

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						traditional diesel, not an additional sale. Support measure goal with state trends (obtained from CARB and/or California Energy commission) – for example in 2020 ~20% of total diesel pool in 2020 is biodiesel or renewable diesel (https://www.energy.ca.gov/data-reports/reports/weekly-fuels-watch/refinery-inputs-and-production). Revise implementation measures to be more specific such as the amount of gallons from the municipal fleet that can be replaced with RD and by when. Include additional implementation measures such as providing education to County residents to promote use of RD over diesel, tracking the amount of RD and diesel sold in the County to track progress, partner with gas station owners to		

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						increase the number of Humboldt County gas stations supplying RD.		
Strategy 1.6 – Promote electrification of yard equipment								
Objective 1.6.1 – Gas-powered yard equipment trade-in Program	Implementation Measure 1.6.1.1. – Trade in gas powered lawn mowers Implementation Measure 1.6.1.2. – Trade in gas powered chainsaws Implementation Measure 1.6.1.3. – Trade in gas powered trimmers	Not specified	44 36 10	-	-	**Limitation:** The implementation actions lack specificity to demonstrate how the specific metrics will be achieved. The measure doe not reference the state regulations or goals for off-road equipment emissions. The calculations are based on guessed amounts of equipment by category that are not substantiated. **Recommendation:** Include implementation actions that identify who or what organization/department will operate the trade-in program, a time frame of when it will be implemented, how it will result in trade in of lawn equipment (i.e., education campaign, incentives, ordinance), and how will the program be funded. Reference example projects or trade-in	450 lawn movers traded in for electric version 340 chainsaws traded in for electric version 420 trimmers traded in for electric version	

GHG Reduction Strategy	Foundational Action(s)	Execution Timing	GHG Emissions Reduction (MT CO2e)	Substantial Evidence				Resolution Provided?
				Reference(s)	Project Example(s)	Comment(s)	Tracking Metric (s)	
						programs that are structured similarly to demonstrate effectiveness of such a program. Reference states regulation on small off-road engines (https://ww2.arb.ca.gov/news/carb-approves-updated-regulations-requiring-most-new-small-road-engines-be-zero-emission-2024). Consider using OFFROAD2021 for Humboldt County to support the numbers (e.g., OFFROAD2021 has fuel consumption by equipment type and in conjunction with average fuel use per piece of equipment per year the number of pieces of equipment could be estimated.		

Attachment B

List of Measures Lacking Substantial Evidence

Objective 1.1.1: Public Light Duty BEV Adoption; 2030 Target 34% of passenger vehicles in Humboldt County are ZEV's (18,301 ZEV's purchased).

- Implementation Measure 1.1.1.1: Promote Purchasing of Electric Vehicles Through Public Outreach.
- Implementation Measures 1.1.1.2. and 1.1.1.3: Provide Incentives for ZEV Adoption; 2030 Target: 34% of passenger vehicles in Humboldt County are ZEV's (17,652 ZEV's purchased).
- Implementation Measure 1.1.1.4 & 1.1.1.5: Install Public, Shared Private and Workplace L2 and L3 Charging Stations; 2030 Target: 2,486 L2 plugs installed, 83 L3 plugs installed.
- Implementation Measure 1.1.1.6: Install Home EV Charging Infrastructure; 2030 Target: 5,296 home charging plugs installed.

Objective 1.1.2: Encourage Public Light Duty FCEV Adoption

- Implementation Measure 1.1.2.1: Promote Public Adoption of FCEV's; 2030 Target: Garner one or more fleet commitments per year through outreach camplaigns.
- Implementation Measure 1.1.2.2: Install Hydrogen Fueling Stations to Support Light Duty Vehicles; 2030 Target: Seven hydrogen fueling stations permitted.

Objective 1.2.1: Electrify Heavy Duty Fleets; 2030 Target:13% of medium and heavy-duty vehicles on the road in Humbodlt County are ZEV's (489 trucks incentivized)

- Implementation Measure 1.2.1.1: Convene a Freight/Offroad Electrification Working Group; 2030 Target: Working group convened.
- Implementation Measure 1.2.1.2: Incentivize Accelerated Zero-emission Freight Ahead of Advanced Clean Truck Adoption Rates; 2030 Target: 489 vehicles purchased.
- Implementation Measure 1.2.1.3: Install "On-route" Charging Stations for Battery Electric heavy duty trucks; 2030 Target: 268 charging stations installed.
- Implementation Measure 1.2.1.4: Install Hydrogen Fueling for Fuel Cell Electric Heavy Duty Trucks; 2030 Target: 5 charging stations installed.

Objective 1.3.1: Electrification of Light Duty Municipal Fleets; 2030 Target: 1,023,944 electrified miles (BEV and FCEV).

- Implementation Measure 1.3.1.1: Install Fueling infrastructure.

- Implementation Measure 1.3.1.2: Replace High Mileage Vehicles with BEV's; 2030 Target: 724,612 electrified miles.
- Implementation Measure 1.3.1.3: Replace high-mileage Vehicles with FCEV's; 2030 Target: 299,332 electrified miles.

Objective 1.4.1: Achieve and Exceed Statewide Transit Electrification Targets; 2030 Target: 16 battery electric buses purchased; 24 fuel cell electric buses purchased.

- Implementation Measure 1.4.1.1: Install Fueling infrastructure.
- Implementation Measure 1.4.1.2: Purchase Battery Electric Buses; 2030 Target: 16 ZEB's.
- Implementation Measure 1.4.1.3: Purchase Fuel Cell Electric Buses; 2030 Target: 24 ZEB's.

Objective 1.5.1: Increase Consumption of Renewable Diesel

- Implementation Measure 1.5.1.1: Increase Use of Renewable Diesel; 2030 Target: 277,351 gallons of renewable diesel sold.

Objective 1.6.1: Gas-Powered Yard Equipment trade-in program

- Implementation Measure 1.6.1.1: Trade in Gas Powered Lawn Mowers; 2030 Target: 420 lawn mowers traded in for an electric version.
- Implementation Measure 1.6.1.2: Trade in Gas Powered Chainsaws; 2030 Target: 340 chain saws traded in for an electric version.
- Implementation Measure 1.6.1.3: Trade in Gas Powered Trimmers; 2030 Target: 420 trimmers traded in for an electric version.

Objective 3.2.1: Electrify Existing Homes; 2030 Target: 26%of existing homes transition to electrification (14,293 homes).

- Implementation Measure 3.2.1.1: Existing Natural Gas Home Transitions to All-Electric; 2030 Target: 10,739 existing homes that use natural gas are converted to electric or other measures that achieve an equivalent reduction in gas use.
- Implementation Measure 3.2.1.2: Existing Propane Home Transitions to All-Electric; 2030 Target: 3,152 existing homes that use propane are converted to electric or other measures that achieve an equivalent reduction in gas use.

Objective 3.2.2: Electrify Residential Space Heating

- Implementation Measure 3.2.2.1: Replace Natural Gas Space Heating; 2030 Target: 200 natural gas units converted to a heat pump system (assumes 50%/50% central and wall units replaced).

- Implementation Measure 3.2.2.3: Existing Propane Space Heating; 2030 Target: 20 propane units converted to a heat pump system (assumes 50%/50% central and wall units replaced).

Objective 3.2.3 Electrify Residential Water Heating

- Implementation Measure 3.2.3.1: Replace Natural Gas Water Heating; 2030 Target: 200 natural gas water heaters converted to heat pump water heaters.
- Implementation Measure 3.2.3.2: Replace Propane Water Heating; 2030 Target: 20 Propane water heaters converted to heat pump water heaters.

Objective 3.2.4 Electrify Residential Dryers

- Implementation Measure 3.2.4.1: Replace Natural Gas Dryers; 2030 Target: 200 natural gas dryers converted to electric heat pump dryers.
- Implementation Measure 3.2.4.2: Replace Propane Dryers; 2030 Target: 20 propane dryers converted to electric heat pump dryers.

Objective 3.2.5 Electrify Residential Cookstoves

- Implementation Measure 3.2.5.1: Replace Natural Gas Cookstoves; 2030 Target: 200 natural gas cookstoves converted to electric (resistant or inductive) cookstoves.
- Implementation Measure 3.2.5.2: Replace Propane Cookstoves; 2030 Target: 20 propane cookstoves converted to electric (resistant or inductive) cookstoves.

Objective 3.2.6 Electrify Commercial Buildings

- Implementation Measure 3.2.6.1: Transition Small Commercial Natural Gas Appliances to Electric; 2030 Target: 9,055,522 total cumulative aquare feet all electric small commercial units in areas served by natural gas or other measures that achieve an equivalent reduction in gas use.
- Implementation Measure 3.2.6.2: Transition Small Commercial Propane Appliances to Electric; 2030 Target: 21,057 total cumulative aquare feet all electric small commercial units in areas served by propane or other measures that achieve an equivalent reduction in gas use.

Objective 3.2.7: Electrify Commercial Space Heating

- Implementation Measure 3.2.7.1: Small Commercial, Natural Gas; 2030 Target: See implementation measure 3.2.6.1.
- Implementation Measure 3.2.7.2: Small Commercial, Propane; 2030 Target: 1,000 total cumulative square feet all electric in areas served by propane.

Objective 3.2.8: Electrify Commercial Water Heating

- Implementation Measure 3.2.8.1: Small Commercial, Natural Gas; 2030 Target: See implementation measure 3.2.6.1.
- Implementation Measure 3.2.8.2: Small Commercial, Propane; 2030 Target: 1,000 total cumulative square feet all electric in areas served by propane.

Objective 3.2.9: Energy Assessments and Efficiency Upgrade Programs

No Implementation Measures listed.

Objective 3.2.10. Energy Efficiency Fair

No Implementation Measures listed.

Objective 3.3.1: Electrify Space and Water Heating, Dryer, and Cookstoves in New Residential Construction

- Implementation Measure 3.3.1.1: Require Electric Appliances in New Homes (Single and Multi-family) in Areas Served by Natural Gas; 2030 Target: 3,196 new homes are all electric.
- Implementation Measure 3.3.1.2: Require Electric Appliances in New Homes (Single and Multi-family) in Areas Served by Propane; 2030 Target: 143 new homes that would be built all electric.

Objective 3.3.2: Electrify Space and Water Heating in New Small Commercial Construction

- Implementation Measure 3.3.2.1: Require Electric Appliances in New Small Commercial Buildings in Areas Served by Natural Gas; 2030 Target: 1,132,846 total cumulative square feet new natural gas small commercial units (only counts space and water heating).
- Implementation Measure 3.3.2.2: Require Electric Appliances in New Small Commercial Buildings in Areas Served by Propane; 2030 Target: 15,077 total cumulative square feet new propane small commercial units (only counts space and water heating).

Objective 3.4.2: Improve Energy Efficiency in Existing Buildings

- Implementation Measure 3.4.2.1. Existing Residential, Natural Gas; 2030 Target: Support RCEA's ongoing energy efficiency work.
- Implementation Measure 3.4.2.2: Existing Residential, Propane; 2030 Target: Support RCEA's ongoing energy efficiency work.

Objective 3.4.2: Upgrade Electric Appliances in Existing Businesses; 2030 Target: Support RCEA's existing efforts.

- Implementation Measure 3.4.2.1. Existing Residential, Natural Gas; 2030 Target: Support RCEA's ongoing energy efficiency work.

- Implementation Measure 3.4.2.2: Existing Residential, Propane; 2030 Target: Support RCEA's ongoing energy efficiency work.
- Implementation Measure 3.4.2.3. Existing Commercial, Natural Gas; 2030 Target: Support RCEA's ongoing energy efficiency work.
- Implementation Measure 3.4.2.4: Existing Commercial, Propane; 2030 Target: Support RCEA's ongoing energy efficiency work.

Objective 3.4.3: Improve Energy Efficiency in New Buildings

- Implementation Measure 3.4.3.1: Residential, Natural Gas; 2030 Target: See implementation measure 3.2.1.1.
- Implementation Measure 3.4.3.2: Residential, Propane; 2030 Target: See implementation measure 3.2.1.2.
- Implementation Measure 3.4.3.3: Small Commercial, Natural Gas; 2030 Target: 1,323,552 total cumulative square feet new natural gas small commercial units.
- Implementation Measure 3.4.3.4: Small Commercial, Propane; 2030 Target: 15,077 total cumulative square feet new propane small commercial units.

Objective 3.5.1: Jurisdictions Decarbonize Existing Municipal Buildings

- Implementation Measure 3.5.1.1: Decarbonize Buildings Using Natural Gas.
- Implementation Measure 5.5.1.2: Decarbonize Buildings Using Propane.

Objective 3.6.1: Energy Efficiency in Large Commercial and Industrial Manufacturing Processes

- Implementation Measure 3.6.1.1: Reduce Electricity Consumption by 5%; 2030 Target: 428,800 total cumulative square feet manufacturing and processing space.
- Implementation Measure 3.6.1.2 Reduce Natural Gas Consumption by 5%; 2030 Target: 458,800 total cumulative square feet manufacturing and processing space.

Objective 5.1.1: Establish Diversion and Compost Programs

- Implementation Measure 5.1.1.1 Adopt Ordinance Requiring 75% Lumber Waste Diversion to Green Waste Facilities; 2030 Target: 8,269 annual tons lumber waste diverted.
- Implementation Measure 5.1.1.2: Coordinate with HWMA to Expand Yard Waste Service and Explore Residential Composting; 2030 Target; 75% of organic waste (14,848 annual metric tons) composted.

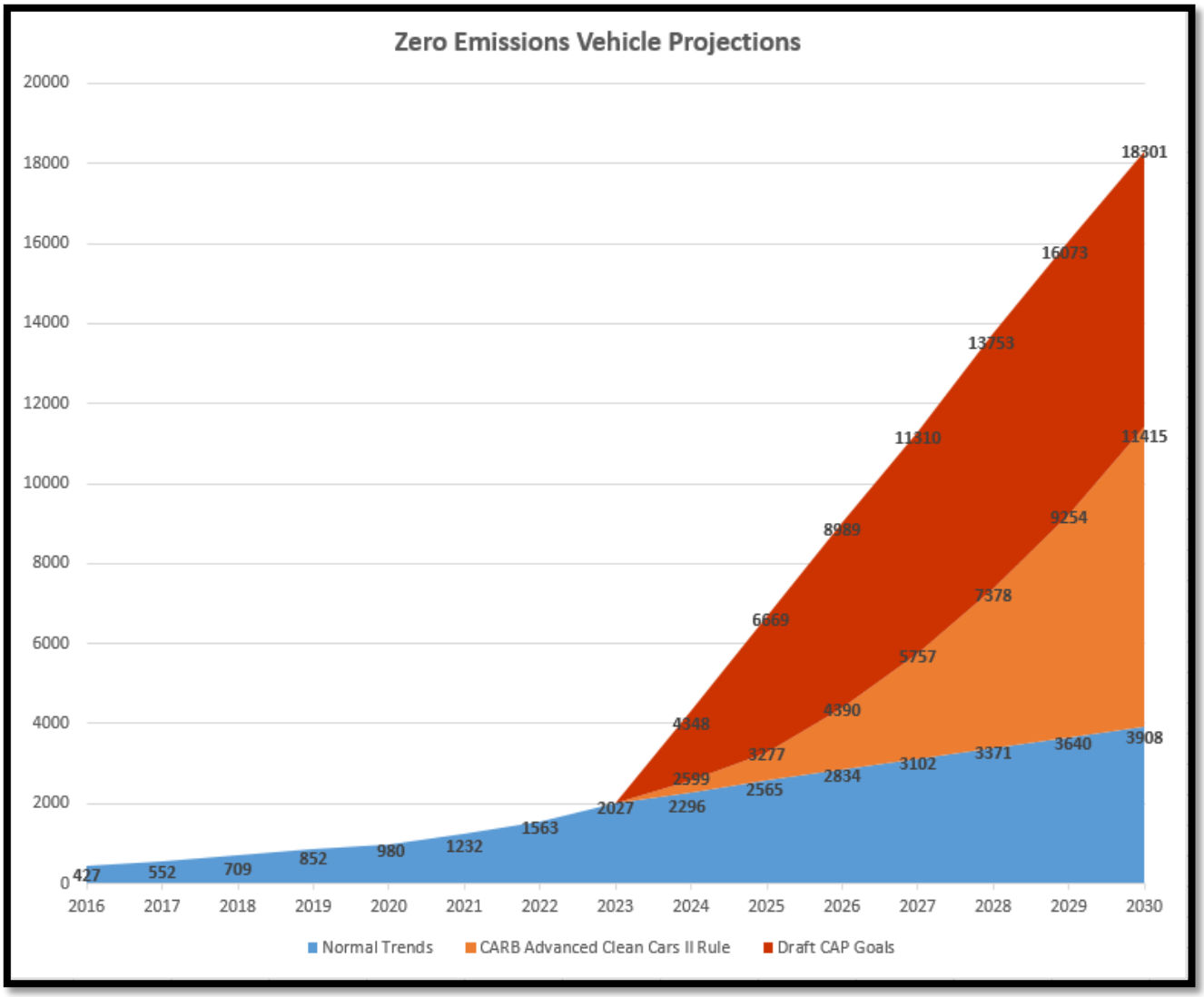
Objective 5.2.1 Expand Recycling and Reuse Programs

- Implementation Measure 5.2.1.1: Require New Residential and Commercial Projects to Submit a Waste Management Plan for New Construction or Major Retrofits; 2030 Target: 17,051 annual metric tons construction waste diverted.
- Implementation Measure 5.2.1.2: Major Event Recycling and Waste Diversion Plan; 2030 Target: Divert 70 annual metric tons solid waste from events. 50% of recyclables are recycled and 75% of organics composted.
- Implementation Measure 5.2.1.3: Enhance Regional Coordination on Waste Mitigation.

Objective 6.1.1: Reduce Diesel Consumption

- Implementation Measure 6.1.1.1 Use Renewable Diesel in Construction Equipment; 2030 Target: 5,000 gallons of renewable diesel used in construction equipment.
- Implementation Measure 6.1.1.2 Use Electric and Hybrid Construction Equipment.
- Implementation Measure 6.1.1.3 Limit Construction Equipment Idling beyond Regulation Requirements.
- Implementation Measure 6.1.1.4 Recycle Construction Waste Above 50% Requirement.
- Implementation Measure 6.1.1.5 Divert Lumber Waste Above 75% Requirement.
- Implementation Measure 6.1.1.6 Replace Diesel Generators with Battery Storage.

Attachment C



Attachment D

Rincon Consultants, Inc.

Add Service Proposal

To Assist County with Regional CAP Updates

Rincon Consultants, Inc.
4825 J Street, Suite 200
Sacramento, California 95819
916-706-1374

September 13, 2023
Rincon Project No. 22-13470

John Ford
Director of Planning and Building
Humboldt County Planning and Building Department
3015 H Street
Eureka, California 95501
Via email: JFord@co.humbodlt.ca.us

Subject: Add Service Proposal to Assist County with Regional CAP Updates

Rincon Consultants, Inc. (Rincon) has been contracted by Humbolt County to prepare the Environmental Impact Report (EIR) for the Humboldt County Regional Climate Action Plan (CAP) as well as the development of a California Environmental Quality Act (CEQA) Greenhouse Gas (GHG) Emissions Thresholds and Guidance Document. Prior to beginning this work, Rincon conducted a review of the draft CAP and has identified some limitations to existing strategies and areas for improvements. After reviewing the recommendations, the County has requested that Rincon provide an add service proposal to assist the County with updating their GHG analysis, CAP strategies, and substantial evidence documentation such that the CAP meets the requirements as a CEQA-qualified GHG Reduction Plan.

Rincon understands that the County has limited funds to update the CAP document and analysis. Based on our call with the County on September 13th, the following section details the specific tasks and subtasks that make up this add service proposal scope of work.

Scope of Work

Task 1 Updating GHG Analysis

The County prepared a 2015 inventory to represent current day conditions and for forecasting future emissions. The County also developed a 1990 inventory from available historical data for target setting. During Rincon's preliminary review, we noted that the 2015 and 1990 inventory includes several GHG sources that the County does not have substantial influence or jurisdictional control over and the forecasts do not appear to include the appropriate state policies. Additionally, it appears that methodologies for activity data between 1990 and 2015 may be inconsistent in certain sectors. Further itis unclear what sources were used for activity data and emission factors in 1990, making it challenging for consistent methodology replication over time.

To be able to accurately track progress over time, it is essential that previous and current GHG inventories are consistent in terms of the methodology utilized, sectors included, activity data utilized, and application of emissions factors. Inconsistencies between previous and current inventories pose the risk of changes in GHG emissions being a byproduct of methodological change rather than actual change in emissions. This limits defensibility of the CAP document as a CEQA qualified GHG Reduction Plan and hinders a jurisdiction's ability to accurately track progress with CAP implementation. Additionally, State guidance recommends focusing the inventory, forecasting and target setting on emission sources that a jurisdiction can have influence over through developed strategies. As such, Rincon recommends updating the inventory, forecast and targets of the CAP to improve consistency across inventories, utilize current best practices, and better

encompass the GHG emission sources that the County has influence over and can impact through strategy development and implementation. The following section provides different routes for updating the inventories as well as follow-on subtasks to revise the forecasts, and targets.

Task 1.1 Prepare Updated GHG Inventory

Under this option for Task 1.1, Rincon will prepare an updated GHG inventory using communitywide 2022 activity gathered from utilities, publicly accessible models (i.e., Google EIE, EMFAC, OFFROAD), and data provided by the County. The 2022 community inventory will comply with the Global Protocol for Community-scale GHG Emissions (GPC) and the U.S. Community Protocol. As part of the analysis, Rincon will assess the activity data for the 2022 inventory for completeness and accuracy through an internally vetted quality assurance/quality control (QA/QC) process and present it in a concise manner to provide transparency and a replicable pathway for future emissions reporting. Rincon will complete the inventory calculations in Rincon's Excel calculation tool and will provide both the unlocked inventory tool and a technical memorandum with relevant tables and charts of the 2022 community GHG inventory findings.

- **Benefits:** Since 2015 there have been several updates to modeling tools for on-road and off-road emissions, as well as methodological updates. Preparing a 2022 inventory would utilize the current best practices and be a better representation of current day emissions compared with 2015. Additionally, preparing an updated current inventory provides the opportunity to obtain disaggregated county and municipal data allowing for more specified measure development. This task would include our in-house inventory tool that is integrated with our forecast, target setting and SPARQ tool described in the following sections. This tool transparently details the methodologies utilized and houses all raw data together improving replicability in future years.
- **Considerations:** Preparing an updated inventory and technical memorandum would require more time and cost to collect all necessary data.

Task 1.2 Update Forecast

As previously noted, the current forecast does not contain the state policies that are considered best practice to include or exclude. For example, it is not typical to include local goals if they are not mandated policies, such as the RCEA RePower Plan goals. Inclusion of such goals are better placed in the strategy development section of the CAP. Therefore, as part of this subtask the Rincon team will utilize our forecasting tool to update both a business-as-usual (BAU) forecast and an adjusted forecast (which includes reductions from state legislation) of expected emissions broken down by emissions sector for specific future years, such as 2030 and 2045. The forecast will be based on either an updated 2022 inventory or 2015 inventory depending on the Subtask 1.1 option selected. Rincon will work with the County to identify the best source for population, jobs, and land use change data and could include Humboldt County data, Department of Finance, and Regional Housing Need Allocation (RHNA) housing considerations. Rincon will provide a draft of the forecast tool and a detailed technical memorandum for review to the County before incorporating feedback and developing a final deliverable.

Task 1.3 Update Target Analysis

As mentioned above, Rincon understands that the County developed a 1990 inventory using available historical data and has based the CAP targets on the 1990 baseline. To ensure consistency with the updated inventory and forecast that will occur under subtask 1.1 and 1.2, this subtask would involve updating the targets to be back-cast from either the updated 2015 inventory or updated 2022 inventory depending on whether the County choose to authorize subtask 1.1 – A or subtask 1.1 – B. Because 1990 historical data is often found to be incomplete and methodologies have been updated, it is generally preferrable to back cast to 1990 levels utilizing a current GHG inventory as a means to set targets. Setting targets from a 1990 level

that was back-casted from a current inventory is advantageous in ensuring consistency between the targets, the inventory, and forecast and improves comparability for tracking progress.

As part of this subtask Rincon will work with the County to identify targets that are practical, defensible, and consistent with current state legislation, including SB 32 and the newly signed AB 1279. Rincon will produce both per capita and mass emission-based targets for the County to review. Per capita emissions targets are well established by the state through the 2017 and 2022 Scoping Plans and will provide a portrayal of the County's emission changes over time due to the ability to normalize population fluxes. A complete analysis of both options will be conducted and presented to the County for approval.

Assumptions

- County will provide all the data necessary to calculate or revise the inventory, which may include previous inventory/ forecast workbooks in MS Excel.
- Updates to the existing inventory would be based on the identified inconsistencies as part of the consistency analysis prepared under subtask 1.1 – B and would not include updates to data.
- Rincon will work with the County to identify the best source for population, jobs, and land use change data and could include Humboldt County data, Dept of Finance, and RHNA housing considerations.
- One round of consolidated comments will be provided by the County on the draft deliverables. Any additional revisions will be completed on a time and materials basis in accordance with our standard fee schedule (attached).

Deliverables

- Data Request
- Task 1.1 – A: 2022 Community GHG inventory, forecast, and target tool (MS Excel)
- Task 1.1 – B: Data Evaluation and Consistency Memorandum
- Task 1.1 – B: Updated GHG Inventory Calculations
- Inventory, Forecast, and Targets Technical Report

Task 2 Measure Development

Rincon has previously conducted a review of the developed strategies and measures for the draft CAP and provided a list of identified limitations and recommendations to the County. The most notable limitations were the inclusion of goals that were not adequately supported by the actions meant to achieve the measures and unsubstantiated GHG emission reduction quantification, both of which are key components to a CEQA-qualified CAP. As part of this task, Rincon will work with the County to 1) revise existing measures such that the goals are well supported with the developed actions; 2) assess any policy or program gaps and identify additional opportunities for emission reductions and new measure development; 3) develop targeted approaches that are differentiated specifically for municipal and rural areas of the county; 4) quantify the GHG reduction potential of the revised and new measures and provide documentation of the substantial evidence supporting the strategy.

To support the measure development process, Rincon has developed a suite of tools and assessment strategies to support what we have found to be the most critical portion of a CAP.

Task 2.1 Scenario-Planning for GHG Reduction Strategies

Rincon will begin by inputting the County's current strategy goals into our in-house Scenario Planning and Reduction Quantification (SPARQ) tool. The SPARQ tool calculates GHG reduction potential based on the

established goals and using standard substantial evidence. The GHG emission reduction potential is then compared to the adjusted forecast and established target to demonstrate the emissions that would need to be reduced by additional action or increased implementation of established actions to reach the target. The SPARQ tool will allow Rincon and the County to quickly iterate on potential levels of implementation for each of the currently identified strategies to find a level of implementation that will allow the County to meet its long term GHG reduction targets.

Once the key strategies and level of reduction required in each sector is identified, Rincon will begin developing a suite of measures and actions that can be implemented to achieve the required reductions. The development of actions is the most complex portion of the work scope, requiring a careful balance between feedback from interested parties, cost-effectiveness, progression, feasibility, and substantial evidence. To aid in this process, Rincon has developed the following frameworks which we use to guide our measure and action development.

- **Climate Action Pillars:** Rincon has also identified several key attributes (i.e., education and outreach, structural change, GHG reduction, equity, connectivity, economic viability) for which each strategy must address in order to have the highest chance of being implemented. Every measure identified for the County should strive to have an action that aligns with each of the key pillars to maximize the implementation of the CAP and demonstrate how the measure and associated goal are achievable.

Task 2.2 Revised Measures and Action List

Based on the above criteria and the existing measures and actions of the draft CAP, Rincon will develop a draft list of revised/new GHG reduction measures and actions that will act as a roadmap and align with the County's GHG reduction targets for the established target years. The measure and action list will include the recommended County and/or incorporated City involvement (e.g., role, department lead), linkages to existing plans, codes, or activities, and the identification of interested parties, community-based organizations, and partners essential to the successful implementation. We will use SPARQ tool to help fine-tune the measures and actions into a final set that can be feasibly implemented by both the municipal and rural portions of the county and also achieve the desired results of overall GHG reduction and support of regional initiatives. Rincon assumes this list of actions will go through one round of County staff review before being shared with the community and other interested parties.

Task 2.3 Measure Quantification and Substantial Evidence Documentation

Once the County has identified which GHG reductions strategies, policies, and actions they want to proceed with, Rincon will conduct an analysis of GHG emissions reduction quantification of such strategies and policies. Given that the County's goal is to prepare a qualified CAP that can be used for future CEQA GHG emissions analysis streamlining, Rincon will also provide the necessary substantial evidence to support the quantification of each strategy, measure, and action. Substantial evidence would entail emissions factors, scientific references, and case studies to support justification of the GHG emissions reduction amounts indicated for the various measures and actions. The emissions reduction quantification analysis will be included as part of a technical Measures GHG Reduction and Substantial Evidence report that can later be included as an appendix to the CAP document.

Assumptions

- Rincon has budgeted for 6 hours of project manager and principal time to meet via video conferencing with County staff and interested parties (e.g., incorporated City staff) to discuss and collaborate on measure development.

- One round of consolidated comments will be provided by the County on the draft deliverables. Any additional revisions will be completed on a time and materials basis in accordance with our standard fee schedule (attached).

Deliverables

- SPARQ Tool[1] (MS Excel)
- Draft, Public Draft, and Final List of measures and actions
- Measures GHG Reduction and Substantial Evidence technical report

Task 2.4 Interagency Engagement

Rincon has found the best CAPs are developed in close collaboration with City and County staff from all departments. Because many of the actions identified in this regional CAP will impact and augment the various City and County departments operations, engagement with the staff and across agencies improves buy-in early on, feasibility of measures and actions, and ultimately implementation of the CAP. As part of this optional task, Rincon proposes to hold two workshops with relevant County and City staff to 1) review the inventory, forecast and targets update and review draft GHG reduction measures, and 2) refine the draft GHG reduction measures. In addition to these overall workshops, as part of this task Rincon would also host up to 8 virtual conference calls with each incorporated City and the County to discuss more in depth measure and action specifics during the measure and action development phase.

Optional Task 2.5 Community Engagement

Gaining community and stakeholder buy-in is found to improve the success of CAP implementation. We know that an engaged and excited community enhances the planning process and provides opportunities for CAP initiatives to be championed by community leaders. Therefore, Rincon presents this optional task to work with the County to raise awareness and solicit input on the CAP through a variety if stakeholder and community outreach and engagement efforts. We prioritize engagement that is action-oriented, builds off a common community vision, and encourages sustained involvement after adoption of the CAP into implementation. Rincon has found that providing two widely advertised community workshops creates a strong foundation on which to build additional community outreach and engagement from. Rincon proposes to conduct two community workshops via online platform such as Teams or Zoom in with added tools such as surveys and mural boards to reach a large amount of individuals and both provide information on key findings and solicit feedback on potential mitigation strategies. This optional task proposes two workshops: 1) Results of Inventory, Forecast, and Targets of the CAP and the overall process and Brainstorming on Measures and Actions; and 2) Draft measures and actions feedback. The Rincon Team will lead both workshops, develop presentations, and create interactive activities to engage participants. Rincon will also document the process and provide a summary memorandum to the County upon completion of the workshops. We will also include links for 2 online surveys intended to gather community feed-back during key project milestones, such as the initial measure brainstorming, measure refinement and prioritization, and the Draft CAP.

Assumptions

- Workshops (4) will be up to two hours in length, and occur virtually
- Calls/meetings (8) will be an hour or less and occur virtually

[1] This tool is integrated with our inventory, forecast and targets tool.

- Three Rincon staff members will attend each workshop
- Two Rincon staff members will attend each meeting.

Deliverables

- Materials and presentations for two interagency workshops and two community workshops
- Summaries/notes from each workshop
- Two surveys to be hosted on the County and incorporated Cities websites and provided during public workshops

Task 3 Draft CAP Revisions

If desired by the County, Rincon can revise the draft CAP based on updates made to the inventory, forecast, targets, and measures.

- **Benefits:** Rincon has prepared CAP documents across the state for Cities, Counties, and special districts. We have a team that works specifically on CAPs, allowing us to dedicate resources to quickly revise the draft CAP relieving strain on County staff. It is estimated that we could revise the CAP after Tasks 1-2 are completed within 3 weeks.
- **Considerations:** This task would cost an estimated $20,000.

Assumptions

- Rincon will complete the revisions in the draft CAP provided by the County in word format after Task 1-2 are completed.
- One round of consolidated comments will be provided by the County on the draft deliverable. Any additional revisions will be completed on a time and materials basis in accordance with our standard fee schedule (attached).

Deliverables

- Draft and Final Revisions prepared within County Draft CAP (Word)

Task 4 Project Management

Task 4.1 Project Scope Kick-off

Within one week of authorization to proceed, Rincon will organize a kick-off meeting with the primary project team members which consists of Rincon's Project Manager and GHG Technical Advisor with the relevant County Staff. This meeting will serve as a forum to review and confirm the new work scope, objectives, scope of services, contract approach, and schedule. This meeting will also serve to establish the project management procedures, including invoicing terms, and communication protocols. Following the kickoff meeting, Rincon will provide a refined schedule, meeting minutes, as well as a final list of requested applicable documents and data for the County to provide.

Task 4.2 Project Management

Rincon employs robust project management protocols that are tailored to meet the needs of our clients. The Project Manager will be responsible for project management activities over the course of the project and will serve as the primary point of contact. The Principal-in-Charge will provide oversight and technical guidance throughout the project. Our project management systems encompass internal oversight of staff as well as

management of the tasks included within the work program. We will provide regular reporting to the County on the status of technical and policy issues, schedule, and budget. The project management team will also be involved in the quality assurance and review of all tasks and work products within this work program. Rincon's Principal-in-Charge will review all deliverables before they are submitted to the County.

Assumptions

- It is assumed that Tasks 1-2 will take approximately 4 - 6 months depending on whether Task 1.1 – A or Task 1.1 – B are selected. This is based on our experience related to data collection for inventories and the iterative nature of measure development.
- If the project schedule is delayed or further assistance with data collection beyond 10 hours of Rincon staff time is requested, additional project management and data collection assistance will be completed on a time and materials basis in accordance with our standard fee schedule (attached).

Deliverables

- 0.5-hour virtual kickoff meeting
- Meeting agenda and notes (electronic)
- Project Schedule
- Regular Communication including up to 10 30-minute check in calls

Schedule and Cost

Rincon anticipates the work scope presented to take approximately 4 to 6 months to complete depending on the subtasks selected by the County. The data collection process for developing a new inventory (Task 1.1) can take up to 90 days due to the data request process with utilities. Additionally, in our experience the iterative nature of measure development can take weeks to months to work through depending on the number of interested parties involved in measure development. To expediate the schedule to the highest degree feasible, Rincon proposes to host bi-weekly check-in meetings with the County to improve workflow. If delays in data collection, reviews or revisions occur the schedule may need to be expanded. Expansion of the schedule may require additional scope and cost adjustments to account for additional project management.

The estimated cost for each subtask described in this work scope is presented in the table below and corresponds to the objectives and specific objectives within each subtask.

Table 1 Cost Summary

Task	Estimated Cost
Task 1: GHG Analysis Update	
Task 1.1A – Prepare Updated GHG Emissions Inventory	$19,574
Task 1.2 – Update Forecast	$7,085
Task 1.3 – Update Targets	$5,513
Task 2: Measure Development	
Task 2.1 – Scenario-Planning for GHG Reduction Strategies	$27,077
Task 2.2 – Revised Measure and Action List	$9,665
Task 2.3 – Measure Quantification and Substantial Evidence Documentation	$19,247
Task 2.4 – Interagency Engagement	$6,849

Optional Task 2.5 – Community Engagement	*$13,173*
Task 3: Draft CAP Revisions	
Task 3.1 – Draft CAP Revisions	$18,741
Task 4: Project Management	
Task 4.1 – Project Kick-off	$1,055
Task 4.2 – Project Management	$7,020
Total	**$113,126**
Total + Optional	***$126,839***

All work would be performed in accordance with the work scope outlined above and with the terms and conditions in the existing contract executed on February 14, 2023. Additional services beyond those identified herein would be provided, at your request, on a time and materials expense reimbursement basis in accordance with our standard fee schedule. No other services would be provided without your express written authorization. This add service proposal cost estimate is in effect for a period of 30 days during which time all of the elements of this proposal are fully negotiable to meet the needs of the proposed work scope. To authorize, please provide written notice to proceed.

Thank you for your consideration and for this opportunity to support your regional climate planning efforts with this new work scope. If you have questions regarding this proposal, please contact Erica Linard at elinard@rinconconsultants.com and Kelsey Bennett at kbennett@rinconconsultants.com.

Sincerely,
Rincon Consultants, Inc.

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Attachments

Attachment 1 Rincon Fee Schedule

Rincon Consultants, Inc.

Standard Fee Schedule for Environmental Sciences and Planning Services

Professional, Technical, and Support Personnel*	July 1 – December 31, 2023
Senior Principal	$308
Principal	$297
Director	$297
Senior Supervisor II	$282
Supervisor I	$263
Senior Professional II	$246
Senior Professional I	$230
Professional IV	$204
Professional III	$189
Professional II	$168
Professional I	$150
Associate III	$126
Associate II	$113
Associate I	$105
Field Technician	$91
Data Solutions Architect	$189
Senior GIS Specialist	$181
GIS/CADD Specialist II	$161
GIS/CADD Specialist I	$145
Technical Editor	$142
Project Accountant	$121
Billing Specialist	$103
Publishing Specialist	$116
Clerical	$103

* Professional classifications include environmental scientists, urban planners, biologists, geologists, marine scientists, GHG verifiers, sustainability experts, cultural resources experts, and other professionals. Expert witness services consisting of depositions or in-court testimony are charged at the hourly rate of $400.

Reimbursable Expenses

Direct Cost	Rates
Photocopies – B/W	$0.25 (single-sided), $0.45 (double-sided)
Photocopies – Color	$1.55 (single-sided), $3.10 (double-sided)
Photocopies – 11” by 17”	$0.55 (B/W), $3.40 (color)
Oversized Maps	$8.50/square foot
Digital Production	$15/CD, $20/flash drive
Light-Duty and Passenger Vehicles*	$90/day
4WD and Off-Road Vehicles*	$150/day

*Current IRS mileage rate for mileage over 50 and for all miles incurred in employee-owned vehicles.

Other direct costs associated with the execution of a project, that are not included in the hourly rates above, are billed at cost plus 16%. These may include, but are not limited to, laboratory and drilling services, subcontractor services, authorized travel expenses, permit charges and filing fees, mailings and postage, performance bonds, sample handling and shipment, rental equipment, and vehicles other than covered by the above charges.

Annual Escalation. Standard rates subject to 3.5% annual escalation, on January 1.

Payment Terms. All fees will be billed to Client monthly and shall be due and payable upon receipt or as indicated in the contract provisions for the assignment. Invoices are delinquent if not paid within 10 days from receipt or per the contractually required payment terms.

Effective July 1, 2023

Rincon Consultants, Inc.

Equipment	Rate
Environmental Site Assessment	
Soil Vapor Extraction Monitoring Equipment	$160
Four Gas Monitor	$137
Flame Ionization Detector	$110
Photo Ionization Detector	$82
Hand Auger Sampler	$62
Water Level Indicator, DC Purge Pump	$46
CAPDash	$7,500
Natural Resources Field Equipment	
UAS Drone	$276
Spotting or Fiberoptic Scope	$170
Pettersson Bat Ultrasound Detector/Recording Equipment	$170
Sound Level Metering Field Package (Anemometer, Tripod and Digital Camera)	$113
GPS (Submeter Accuracy)	$67
Infrared Sensor Digital Camera or Computer Field Equipment	$57
Scent Station	$23
Laser Rangefinder/Altitude	$11
Pitfall Traps, Spotlights, Anemometer, GPS Units, Sterilized Sample Jar	$9
Mammal Trap, Large/Small	$1.55/$0.55
Water and Marine Resources Equipment	
Boat (20-foot Boston Whaler or Similar)	$800
Multiparameter Sonde (Temperature, Conductivity, Turbidity, DO, pH) with GPS	$170
Water Quality Equipment (DO, pH, Turbidity, Refractometer, Temperature)	$62
Refractometer (Salinity) or Turbidity Meter	$38
Large Block Nets	$114
Minnow Trap	$98
Net, Hand/Large Seine	$57
Field Equipment Packages	
Standard Field Package (Digital Camera, GPS, Thermometer, Binoculars, Tablet, Safety Equipment, and Botanic Collecting Equipment)	$114
Remote Field Package (Digital Camera, GPS, Thermometer, Binoculars, Tablet and Mifi, Delorme Satellite Beacon, 24-Hour Safety Phone)	$144
Amphibian/Vernal Pool Field Package (Digital Camera, GPS, Thermometer, Decon Chlorine, Waders, Float Tube, Hand Net, Field Microscope)	$170
Fisheries Equipment Package (Waders, Wetsuits, Dip Nets, Seine Nets, Bubblers, Buckets)	$57
Underwater and Marine Sampling Gear (Photo/Video Camera, Scuba Equipment [Tanks, BCD, Regulators, Wetsuits, etc.])	$57/diver
Marine Field Package (Personal Flotation Devices, 100-foot Reel Tapes with Stainless Carabiners, Pelican Floats, Underwater Slates, Thermometer, Refractometer, Anemometer, Various Field Guides)	$100
Insurance, Hazard, and Fees	
Historic Research Fees	$55
L&H Dive Insurance	$57/diver
Level C Health and Safety	$70/person